

Comments on the Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) in relation to PA/06096/23 (EA/00020/22)

PROPOSED THERMAL TREATMENT FACILITY IN THE ECOHIVE COMPLEX, INCLUDING PLANT BUILDING, STORAGE BUILDING, ADMINISTRATION BUILDING, WASTE WATER TREATMENT, TANK FARM AND CISTERNS

SITE AT, ECOHIVE COMPLEX, TUL IL-KOSTA, NAXXAR

1. ERA comments

A. Comments on the Coordinated Assessment Report

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply
1.	2.1	17	Reference is made to: <i>'The existing facility at Marsa will likely be retained to act as a cold standby to the new development,..'</i> Kindly justify statement.	The existing facility at Marsa is expected to be retained as a cold standby to ensure operational continuity and enhance system resilience. Maintaining the Marsa facility as a backup provides a safeguard in the event of unexpected downtime or operational disruptions at the new TTF.	Noted.	-	-
2.	2.1	17	It is stated that <i>'In 2020, Malta exported 32.5kT of hazardous waste, 46% of which was incinerated.'</i> Clarification on the source of this data is needed, noting that this data is not in line with the data reported by Malta for 2020 .	Noted and revised.	Noted.	-	-
3.	2.1	19	Reference is made to the following statements: <i>"The proposal includes the construction of a new hazardous waste incineration plant with two independent lines, each line consisting of a rotary kiln, a waste heat boiler with combustion air fans, an economiser, FGT reactor and bag house filter."</i> <i>"Two lines will offer sufficient throughput capacity to cater for future demands, therefore reducing the amount of waste which is currently exported for incineration. A second line will provide the additional benefit of ensuring that there is no downtime during maintenance works, or in case of fault within the either of the lines. The proposed project also includes space for the addition of a third line to future proof the project against increased demands and potentially accommodate new markets."</i> <i>"These will include a water treatment facility, offices, restrooms, laundry services, kitchen, various administrative spaces, access control points, a reception area for pet carcasses, and</i>	ERV is not a bypass stack; it's the process safety barrier to prevent process incidents in extremely rare circumstances. It is only expected to operate only if all existing safety barriers fail. Therefore, the probability of ERV activation is extremely low, as multiple active and passive safety layers are already in place to mitigate such conditions, including: - Advanced process control system keeping the process within the safe limits - Instrumented alarms - Operator intervention - Emergency shutdown systems (ESD) The ERV is also part of the regulatory and technical framework ensuring that facility can operate safely.	Noted. However, given that air abatement is bypassed when the ERV is activated, appropriate checks and balances, aligned with the latest industry standards, must be implemented to ensure that ERV activation occurs only in genuine emergency situations in line with the Waste Incineration BREF.	Confirmed, this will be implemented on site.	Noted

			<i>a substation. The development will also include parking areas and landscaped zones designed to blend seamlessly with the surrounding environment.”</i> <i>“The plant's height is divided into four volumes, with the tallest section housing the emergency relief vent (ERV), extending above the rest of the roof. The stack will be situated towards the central sections of the ECOHIVE complex with the intention of further minimising visual impacts.”</i> Clarify the function of the emergency relief vent (ERV)? If this refers to a bypass stack, ideally the design should ensure that all air emissions are treated and redundancy air abatement between lines is in place. If bypass stacks remain necessary, the facility should be equipped with secondary emission controls to mitigate environmental & human health impacts.				
4.	2.2.1	21	Reference is made to: <i>‘To the Northwest and West lie the engineered Għallis and Ta’ Żwejra landfill sites. The former is still in use whilst the latter has been rehabilitated through slope stabilisation and re-contouring.’</i> A clarification is required on the rehabilitation through slope stabilisation and re-contouring of Ta’ Żwejra landfill.	Noted and revised.	Original comment still stand. Żwejra landfill has not been rehabilitated.	Sentence has been removed.	Noted.
5.	2.3	25	The EIA states <i>“Waste Regulations (S.L. 549.63) transposing Directive 2008/98/EC stipulate that emissions from waste treatment facilities must adhere to strict air quality limits.”</i> Reference to the Industrial Emissions (Waste incineration) Regulations (SL 549.81) is more relevant than S.L. 549.63.	Noted and revised.	Noted.	-	-
6.	2.3	26	It is stated that <i>‘The development of a new TTF would also support Malta in transitioning towards a circular economy, in line with the wider EU movement in this direction. This is possible by reducing reliance on landfills, exportation and reducing the costs and environmental impacts of the treatment of such waste’</i>. Given that the proposed development is for an incinerator (i.e does not aim to recover energy from the waste), clarify how the proposal would support Malta in the transition to a circular economy.	Noted and revised.	Noted.	-	-
7.	2.3.1	27	Reference is made to <i>“Initially, the development will run with one line, with the possibility of expanding operations to two lines to meet future demand”</i>. It is understood from the rest of the documentation that initially there will be two lines, with a possibility of expanding to three lines to meet future demands.	Noted and revised.	Noted.	-	-

			Kindly update text to reflect the rest of the documentation.				
8.	2.3.3	32	The source from what the agricultural compost will originate is to be provided.	The reference to agricultural compost originates from the planned Organic Processing Plant (OPP), which will convert organic waste into compost. This is part of the broader ECOHIVE complex and not related to the TTF project.	Noted.	-	-
9.	2.4.1	33	Reference is made to <i>‘The unloading or discharge of received waste onto the Facility and its preparation or processing as necessary for storage (including cold storage if needed).’</i> Refrigerated storage is required for facilities handling animal by-products to mitigate odour issues associated with decomposition.	Cold storage has already been incorporated into the facility’s basic design. Sentence has been reworded.	Noted.	-	-
10.	2.4.1	34	The EIA states that <i>“Separate unloading and discharge areas for bins/containers, liquid wastes and animal carcasses”</i>. The unloading of animal by-products should take place in a fully enclosed area to contain potential odour emissions and prevent environmental nuisances. Additionally, the enclosure should be equipped with an appropriate odour abatement system, such as air extraction and treatment to minimize the release of odorous compounds into the surrounding environment. Further information is to be provided on odour and its mitigation.	3 types of unloading systems will be available. - Liquid waste will be transferred to the tank farm via pump and piping, totally enclosed. - Carcasses, will be directly to the shredder area where negative pressure and ventilation measures are in place. - Closed and bins containers (clinical waste, abattoir waste) will be unloaded from trucks Waste will be transferred directly to enclosed areas, with the following ventilation and odour control measures implemented. All buildings receiving or housing residual or biodegradable waste must be operated under negative pressure. The Facility shall be designed to minimise the potential for airborne micro-organisms to be generated. Mechanical ventilation/extraction shall be applied in those areas where poor air quality is likely, as a result of odour, particulate or bio aerosols released from the process, such as the waste reception tanks/vessels, waste preparation and storage areas, where personnel are required to operate. Such emissions shall be	Noted, albeit it should be highlighted that the treatment is not specified. Applicant is to follow the Best Available listed in the Slaughterhouses, Animal By-products and/or Edible Co-products Industries BREF and Waste Incineration BREF. At a minimum the malodorous air should be incinerated (intake air).	Confirmed. BAT in the appropriate BREF documents shall be followed and implemented on site.	Noted.

				controlled and treated to remove any particulates or odours likely to cause harm to human health to operatives or to cause a nuisance beyond the site boundary.																																										
11.	2.4.1	36	In relation to ‘<i>the building design incorporates the use of brightly-coloured materials, translucent surfaces and greenery to add visual interest to the inevitably industrial look.</i>’ and also to Table 6.2 where proposed mitigation measures refers to ‘<i>Earth-toned colours which blend with the surroundings should be used on the building façade.</i>’ To minimise as much as possible the visual impact, the use of bright-coloured material is be avoided.	Noted and revised.	Revision noted. This is to be reflected in the plans and visuals.	The use of colour is an intrinsic characteristic of the TTF building. The colours have been subdued as far as possible to reflect similar colours in the surrounding countryside (reddish soil, yellowish wheat fields, blue sky etc). Regarding apertures and glazing, kindly note that the technical specifications state that the following performance criteria must be achieved by the Contractor: <table><tr><td><u>Physical Properties</u></td><td colspan="2"></td></tr><tr><td>Max glazing width</td><td colspan="2">100mm</td></tr><tr><td>Max frame width</td><td colspan="2">300mm</td></tr><tr><td>Air Gaps</td><td>10% Air</td><td>90% Argon</td></tr><tr><td></td><td colspan="2"></td></tr><tr><td><u>Visible Light</u></td><td colspan="2"></td></tr><tr><td>Transmittance [%]</td><td>τ_v</td><td>≤ 20%</td></tr><tr><td>Reflectance External [%]</td><td>ρ_v</td><td>≤10%</td></tr><tr><td>Reflectance Internal [%]</td><td>ρ_v</td><td>≤ 8%</td></tr><tr><td></td><td colspan="2"></td></tr><tr><td><u>Thermal Properties</u></td><td colspan="2"></td></tr><tr><td>U-Value [W/(m2K)]</td><td>Slope α</td><td>90°</td></tr><tr><td>According to EN:</td><td>U_g</td><td>1</td></tr></table>	<u>Physical Properties</u>			Max glazing width	100mm		Max frame width	300mm		Air Gaps	10% Air	90% Argon				<u>Visible Light</u>			Transmittance [%]	τ _v	≤ 20%	Reflectance External [%]	ρ _v	≤10%	Reflectance Internal [%]	ρ _v	≤ 8%				<u>Thermal Properties</u>			U-Value [W/(m2K)]	Slope α	90°	According to EN:	U _g	1	Noted.
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12.	2.4.1	37	Reference is made to: ‘ <i>Steel, concrete and glass are the main components.</i> ’ The use of glass, where possible is to be limited to avoid glaring.	Glazing on the “bridge” feature is shaded with aluminium louvres whilst that in the office block is relatively small (comparable to glazing used in residential buildings,) is recessed from the façade and is also low within the building south-east facing elevation. The only large fenestration is that into the main industrial building, used as an architectural feature, to “show” the plant and to bring in natural light into the building. Glaring can be reduced by adjusting the angle, implementing tinting glazing and applying non-reflective film.	Noted. These are to be included as mitigation measures and implemented in the design.	See previous comment on glazing and apertures. Section 7.2 has been revised to include such mitigation measures.	Noted.
13.	2.4.2	41	The EIA Report states that ‘ <i>The total site footprint is estimated at 18,185 m². An area of around 3,000 m² will be required during the construction phase for storage of materials, an additional 1,500 m² is needed for pre-assembly and lay down and heavy lifting areas, and 700m² are required for site offices and parking. All spatial requirements will be catered for within the proposed site boundaries.</i> ’ Clarify whether all spatial requirements will be located within the proposed footprint of the TTF in view of reference to ‘proposed site boundaries’.	All spatial requirements for the Thermal Treatment Facility (TTF) will be fully accommodated within the proposed site boundaries.	Noted.	-	-
14.	2.4.2	41	A clarification whether all the services listed will be located within the proposed footprint of the TTF.	All civil works & associated installation would be limited to the site footprint with connections to utility mains in the WSM internal road network that may require trenching within WSM property but outside TTF site boundaries.	Noted.	-	-
15.	2.4.2	41	The EIA Report states that, around 9,000 m ² of crushed rock is required for backfilling. This is referring to the levelling of the site? Kindly clarify.	This is mostly required to form the roads and the external vehicle spaces as well as to bring up levels in the landscaped areas along the TTF/OPP boundary and form these at levels compatible with adjacent road levels. Backfilling within building boundary will only be required to fill the office block foundations.	Noted.	-	
16.	2.4.3	43	Reference is made to “ <i>The shredder unloading bay is positioned in a semi-outdoor space for natural ventilation, while the shredder itself is indoors to contain odours with air suction for incineration. This</i>	Waste received in the shredding unloading bay directly will be transferred to totally enclosed shredder area or cold room, and	Noted, albeit it should be highlighted that the treatment is not specified. Applicant is to follow the Best Available listed in the	Confirmed, BAT listed in the appropriate BREF documents will be followed and implemented on site.	Noted.

			<i>setup ensures adequate odour control and minimal space for cooling.”</i> Kindly clarify further. All areas handling Animal By-products are prone to odours, ideally handling of animal by-products is to take place in enclosed areas with the appropriate mitigation.	handling of the animal by product will take place in enclosed areas with appropriate mitigation for odour and gasses as described in one of the above replies. The required handling of the by-products is limited. The by-products are delivered to the facility in Metal 1100 litres four-wheeled containers. They will be stored at the facility in the cooled storage area until incineration, which should be within 48 hours. The containers will be emptied directly into the hopper for one of the incineration lines. If deemed necessary by the Operator, the container will be emptied into the hopper for the shredder from where it will be transported to a closed storage silo or tank before being pumped to one of the rotary kilns. When the Metal 1100 litres four-wheeled containers are emptied they will be washed which will minimize odour from the emptied container. Air quality control will be provided to the following areas: • Feedstock reception tanks/vessels and areas. • Feedstock preparation equipment. • Storage area • Main processing hall. • Where any external gaseous release is expected. Mechanical ventilation/extraction shall be applied in those areas where poor air quality is likely, as a result of odour, particulate or bio aerosols released from the process, such as the waste reception tanks/vessels, waste preparation and storage areas, where personnel are required to operate.	Slaughterhouses, Animal By-products and/or Edible Co-products Industries BREF and Waste Incineration BREF.		
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				Such emissions shall be controlled and treated to remove any particulates or odours likely to cause harm to human health to operatives or to cause a nuisance beyond the site boundary. The odour abatement design and approach shall include the following elements: • No external storage or processing of waste. • All areas requiring odour control to be operated under negative pressure. • Ventilation rates in all buildings and enclosed areas to be designed at a minimum of 1 – 1.3 air changes per hour. • Building extraction air to be exhausted via a suitably sized and specified odour and dust removal system. • Discrete and separate air extraction systems to be used for general building ventilation and direct extraction from processing plant. A common system for treatment of the extraction air may be used. The Contractor shall be required to prepare an air quality management plan detailing all design and management principles for control of air and odour emissions.			
17.	2.4.3	43	It is stated that <i>“The tank farm, surrounded by a bund wall to collect any leaks, has a capacity of eight tanks.”</i> Kindly provide further information on the tank constituents. Due consideration must be given to the potential for incompatible chemicals to be discharged into the same bund or drainage system, as unintended reactions could pose environmental risks. The design should follow general international good practices- the horizontal BREF on storage may be relevant.	The tank constituents have already been integrated into the facility’s basic design. The design is based on similar hazardous waste treatment facilities across Europe. The liquid waste tank farm is designed to accommodate waste oils, contaminated wastewater and sludges. To address the risk of chemical incompatibilities, a comprehensive Waste Acceptance Protocol will be implemented. Prior to transferring any incoming waste	Noted.	-	

				to the tank farm, sampling and laboratory analysis will be carried out to identify potential incompatibilities. Incompatible wastes will not be transferred to the tank farm under any circumstances. This control mechanism ensures operational safety and environmental protection, and aligns with international best practices, including those outlined in the Horizontal BREF on waste storage.			
18.	2.4.3	44	The EIA Report states “<i>To adhere to the emission control requirements as set by the AMBIENT AIR QUALITY DIRECTIVE 2008/50/EC, SCHEDULE 2 OF S.L.549.81 - THE INDUSTRIAL EMISSIONS (WASTE INCINERATION) REGULATIONS, and COMMISSION IMPLEMENTING DECISION (EU) 2019/2010 OF 12 NOVEMBER 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration. The aforementioned regulations set limit values as described in the following tables.</i>” The limits specified in the indicated tables represent worst-case scenarios used for air dispersion modelling under normal operating conditions. However, the operator must actively pursue the strictest achievable emission levels in line with Best Available Techniques (BAT) conclusions.	The limit values provided in the referenced section are based on relevant EU Directives, Regulations, and BAT conclusions. The actual final limits will be determined through the IPPC permit process and will be strictly adhered to during the facility’s operation. While compliance with these limits ensures legal compliance, the facility’s objective is not merely to meet the granted emission thresholds but to continuously aim for the lowest emissions achievable.	Noted.	-	-
19.	2.4.3	47	Reference is made to ‘<i>Acid Gases (Sulphur dioxide SOX and Halides HCL & HF) Wet scrubber (quench & acid scrubber, alkaline scrubber, neutralising)</i>’. Kindly clarify through which avenue the resulting discharge from wet scrubbing will be released to.	The wastewater from the wet scrubber is expected to be neutralized by the acidic water from the quench and when the salt content is high (measured by the conductivity of the water) the wastewater is discharged into a holding tank and then injected into the incinerator line or reactor for disposal.	Noted.	-	-
20.	2.4.3	47	The EIA report states: “<i>Emissions from the stack will be continuously monitored through a Continuous Emissions and Monitoring System (CEMS). The following pollutants will be monitored by the system:</i> • <i>NOx (or NO + NO2) content (mg/Nm3), expressed as NO2</i> • <i>HCl content (mg/Nm3)</i>	All continuous parameters except mercury content are already covered in accordance with Commission Implementing Decision (EU) 2019/2010 of 12 November 2019, which establishes the best available techniques (BAT) conclusions under Directive 2010/75/EU for waste incineration.	Continuous monitoring for mercury is defined through EN 14884. As per BAT 4, continuous monitoring will be required until proven low and stable mercury content is established. The exact monitoring requirements can be established through the IPPC application process.	Noted and revised accordingly.	Noted, as per BAT 31, for continuous monitoring the half-hourly average mercury emission levels should generally be: — < 15–35 µg/Nm³ for new plants.

			• HF content (mg/Nm³) • SO₂ content (mg/Nm³) • CO content (mg/Nm³) • CO₂ content (mg/Nm³) • O₂ content (mg/Nm³) • Particulate (mg/Nm³) • TOC content (mg/Nm³) • H₂O content (vol %) • NH₃ content (mg/Nm³) • Fluegas flow (m³/s) • Fluegas pressure (kPa) • Fluegas temperature (°C) " The list is incomplete and should be in line with the relevant legislation & BAT conclusions.	Mercury (mg/Nm³), which cannot be continuously monitored, will instead be assessed through periodic sampling and laboratory analysis, with a minimum frequency of once every six months. This approach is in line with the same BAT conclusions. The rest of the parameters listed in BAT4 do not require continuous monitoring and are therefore not monitored by the CEMS system.			CONSULTANT Reply: Noted and included. ERA reply Noted.
21.	2.4.3	48	Reference is made to 'Any runoff from the TTF will be directed through the underground water management system.' The streams of water discharges and their potential treatment and reuse requires further clarifications.	Kindly refer to the updated section in the report.	Noted. It should be noted that the potential for reuse will depend on the nature of the combustion medium and the specific extinguishing agents or methodologies employed. This matter will be further examined through the IPPC process. Should the resulting water prove unsuitable for reuse, an alternative disposal method must be identified. The same applies for other water streams.	Noted	-
22.	2.4.3	49	In relation to 'Water used for fire-fighting will be directed to the leachate pit, and treated in the aforementioned water treatment plant before re-use.' The streams of water discharges and their potential treatment and reuse requires further clarifications.	Kindly refer to the updated section in the report.	Noted. It should be noted that the potential for reuse will depend on the nature of the combustion medium and the specific extinguishing agents or methodologies employed. This matter will be further examined through the IPPC process. Should the resulting water prove unsuitable for reuse, an alternative disposal method must be identified. The same applies for other water streams.	Noted	-
23.	2.4.3	49	What percentage of the hazardous waste currently being exported abroad can be treated at the new TTF?	According to the waste characterization study conducted, the amount of incinerable hazardous waste currently being exported is 4,302 tonnes per year,	Noted.	-	-

				consisting of Clinical Waste (43 t/y) and Manufacturing/Industrial Waste (4,259 t/y).. Therefore, it has the potential to handle 100% of the currently exported incinerable hazardous waste, depending on the actual quantities received in the future.			
24.	2.4.3	50	Reference is made to Table 9. Ideally, automated controls should be in place for the supply and handling of waste, particularly for high-risk waste streams such as clinical waste, as outlined in BAT for Waste Incineration. Automated waste handling systems enhance operational safety, efficiency, and environmental compliance by minimizing manual intervention, reducing the risk of exposure, and ensuring precise waste feed control. Where feasible, the implementation of such technology should be pursued to align with European best practices.	The handling of clinical waste at the facility aligns with techniques a, b, and c of BAT 13 from the Waste Incineration BAT conclusions. Clinical waste is delivered in closed or double-sealed bags placed inside robust, sealed, and combustible 1100-liter yellow containers. These containers remain sealed throughout storage and handling and are not opened at any stage prior to incineration. Sharps and needles are placed in separate containers within the yellow bins. The yellow containers are transferred directly to the kiln feeding system via a dedicated lift and ram feeder. This setup minimizes handling risks and supports full containment.	Noted.	-	-
25.	2.4.4 5.12	51 274	The EIA states that the area may be utilised by Wasteserv Malta for other waste management operations as deemed fit at the time of decommissioning. Any future use of the site shall be subject to any necessary assessment required at the time.	Future use of the site will be carefully considered, with all necessary assessments and approvals conducted at the time to ensure compliance with environmental and regulatory requirements.	Noted.	-	-
26.	2.4.7.2	54	Reference is made to 'Water reuse at ECOHIVE Complex is highly encouraged. An interconnected network of rainwater harvesting and water treatment systems ensures minimal supplies of water from external sources. Wastewater streams sourced with leachate, drain and rainwater are collected and properly treated to provide high quality water within the Complex. The process flow diagram of water, drainage and sewage at the ECOHIVE complex is shown in Figure 17.' Kindly provide a higher resolution of Figure 17 as it is unclear.	Noted and revised.	Noted.	-	-
27.	2.4.7.2	56	With reference to 'Stormwater overflow from the rainwater and water retention pond will be directed to		Noted.	-	-

			a connection point at the site boundary. The water will be piped from the connection point to an existing storm water reservoir South of Magħtab, which has a capacity of 17,000 m³. The site will also collect grey water from two sources which collect water from drains present in all areas of the site expected to collect water: 1) the Leachate pit 2) the Drain Pit The former is the dirtiest source of water and may potentially be polluted. Water from this pit may be reused to top up the slag conveyor system, which is at a constant loss of water. The reuse of this water requires an intense treatment process featuring an oil separator, filtration of particles, precipitation of heavy metals, ultrafiltration, and UV disinfection before being transferred to the Water Resource Tank for further treatment and reuse. Any reject from this process will be re-introduced into the boiler lines. The latter is conditioned with NH₃ (Ammonia) and NaOH (Sodium Hydroxide) and may also contain magnetite, dirt from the boiler and small amounts of other chemicals such as oxygen scavengers or antiscalants. Small particles will be removed from this water using microfiltration, and the resulting water will be UV disinfected before being pumped into the Water Resource Tank for further treatment and re-use.' Whilst general water reuse is encouraged, the statement that the water will be recycled and reuse indefinitely on site and treated to the point that it can supply the boiler is uncertain. Typically, in this industry high-purity, deoxygenated boiler feed water is required to limit the corrosion. Kindly confirm or otherwise.	Water recycling is prioritized in the project but the water will not be reused indefinitely due to technical limitations. Collected rainwater and plant drainage will be treated through separate systems and sent for further processing. While treated wastewater is the preferred source, public water connection will be available as a backup if needed. Following treatment, a portion of the water will be directed to demineralization and deionization units to produce high-purity water for boiler feed. The project aims to minimize discharge; however, any reject water from the treatment process that cannot be recycled will be safely disposed of in the combustion chamber. For further details, please refer to the process flow diagram in Section 2.4.7.2.			
28.	2.4.7.2	56	The EIA states that 'The EPC contractor shall expand the switchboard with a new 11kV breaker and establish an approximately 300 m long cable to a 11kV switchgear at the TTF.' Will additional infrastructure be required outside of the site boundary?	No additional infrastructure will be required outside the footprint of the proposed facility. The statement in the EIA refers solely to the EPC contractor's responsibility to establish the power connection.	Noted.	-	-
29.	2.4.8.3	58	Reference is made to 'Slag will be conveyed to an open top container which can be covered with tarpaulin. Containers shall be used to store the Incineration Bottom Ash (IBA) in the hard standing area.' Indicate the location of the hard standing area to be utilised for the storage of the IBA.	A new drawing has been included in Section 2.4.8.3 to mark the hard standing area.	Noted.	-	-

30.	3.1	60	It should be noted that the siting of the TTF within the ECOHIVE complex was determined through the Waste Management Plan.	Noted and included.	Noted.	-	-
31.	3.3	84	With reference to <i>'The TTF ultimately is designed with its own stack and an air-cooling system as opposed to the seawater cooling system used by the WTE plant.'</i> It should be ensured that consideration are in place with BAT on Industrial Cooling systems.	Noted. This is confirmed by the design and process engineers. Further details will be provided during the IPPC permit process.	Noted.	--	-
32.	4.5	145	With regards to <i>'The assessment addressed Terms of Reference for a terrestrial ecology baseline study and impact assessment (EIA) as put forward by the Environment and Resources Authority in July 2022.'</i> It should be noted that the Terms of Reference issued by the Authority were solely for the preparation of a baseline study.	Noted and revised.	Reference to 'terrestrial ecology baseline study and impact assessment' is still being made. At the time, ERA had only requested the baseline study. In this regard reference is to be made to the baseline study only.	Revised.	Noted.
33.	4.5	145	The baseline study referred to above is to be annexed to the EIA.	The study has been annexed to the Ecology TS.		-	-
34.	4.5	148	It is unclear as to why the broad-brush (marine) habitat survey was included in this report in view that the proposal does not envisage encroachment/ works on the marine environment.	The Method Statement agreed with ERA states: <i>"The assessment of impacts on the marine area will comprise a desktop study. The consultant shall carry out a thorough literature review of readily available data and previous studies within the relevant marine protected areas. Additionally, the management plans of each protected area (where available) shall be consulted."</i> This was done following the ERA's insistence to include a specific section on the marine environment during discussions on the MS. This explains why the broad-brush marine habitat survey from previous EIAs in the area was included in the report.	The inclusion of the marine aspect was request to be included by ERA so that impacts related to the emissions from the stack and impacts related to runoff onto the marine environment could be assessed.	The impacts from runoff and the stack on the marine environment are now included in Section 5.5.	Inclusion in section 5.5.2 has been noted.
35.	4.5	150	Reference is made to: <i>'Between the proposed site and the ECOHIVE complex lies a narrow plot of land which is currently dominated by invasive species such as Arundo donax.'</i> Identify said area on a block plan.	This area is marked in the Doublet & Zammit (2022) habitat map, as <i>"Disturbed ground occupied by Ermes and Ruderal Communities"</i> in brown. The photo showing the <i>Arundo donax</i> next to the Anaerobic Digestion plant is located at the south eastern boundary of the existing plant.	Noted.	-	-

36.	4.5	155	Table 14 should not be limited to protected tree species, but is to include all species present on site.	The full list of species present on site is provided in the Ecology TS. The Coordinated Assessment report does not and should not include the entire list.	Original comment still stands. The coordinated assessment should clearly indicate the number and types of trees present on site. In this regard, the now Table 15 is to be updated to include all species present on site, together with their quantities. The list in the Ecology TS (including scientific species name, English name, type of protection and typical habitat, etc) can still be cross-referenced to in the CA to offer additional information for the reader.	Species table is now included in the CA.	Inclusion noted. Kindly indicate the number of trees present on site.
							CONSULTANT Reply: Number of trees present on site (within the area to be developed only) has been included in Table 16.
							ERA reply: Noted.
37.	5.1	215	In relation to the title of the section. It should be noted that sea cover/use was omitted.	The title states land/sea cover, and land/sea uses. Can you clarify what has been omitted?	The Terms of reference issued for this section was for 'land cover and land/sea uses. The title of the last version of the MS submitted read as 'Method Statement for the land cover and land uses', thus omitting the need for the assessment of sea cover/uses. Noting the above, ERA will not comment on the assessment on sea cover/uses.	Header titles have been renamed.	Noted.
38.	5.1.1	215	Reference is made to the list of mitigation measures described in section 5.1.1 and in the summary of impacts table in section 6.1.	The summary of impacts table has been revised.	Noted.	-	-
	6.1	275	Section 5.1.1 describes '<i>site hoarding, wheel washing facilities and other dust mitigation measures are necessary to contain the adverse impacts caused by activities of the construction phase to the designated site footprint.</i>' Section 6.1 lists '<i>Restrict operations to site as much as possible, minimise construction site size, and implement prevention measures for spillover effects. Compensate losses in nearby areas</i>' and '<i>Follow L.N. 340 of 2022, Construction monitoring.</i>'				

			In view of the above: i) the description of the mitigation measures in both sections should match. ii) further information is to be provided on what is meant by 'compensate losses in nearby areas.'				
39.	5.1.2 6.1	215 275	The report states that ' <i>The residual impacts are mitigated in terms of the proposed tree plantations around the new building.</i> ' Section 5.1.2 does not include the residual impact, whereas in section 6.1, the residual impact following the mitigation measures remains major. Kindly justify.	Text in Section 5.1.2 has been revised accordingly.	Revisions in Section 5.1.2 and Table 6.1 has been noted.	-	-
40.	5.1.2	215	Reference is made to ' <i>The operational phase may give rise to further impacts on the land use in the event of incidents such as fuel spills, fires, water leaks causing flooding or other extreme events which will only constitute indirect impacts from the site operations and can be substantially mitigated and/or prevented in their entirety. For this reason, the potential impacts are considered of remote probability, but potentially major significance, which will be reduced to minor residual significance if the appropriate Emergency Response Plan is in place.</i> ' Besides an Emergency Response Plan being setup, infrastructure and design of the plant should take into consideration environment risks from fires.	Noted and revised.	Noted. Building design considerations listed <i>ISO/TR 26368:2012 Environmental damage limitation from fire-fighting water run-off</i> is encouraged.	Noted	Noted.
41.	5.1.2 6.1	215 275	Reference is made to ' <i>impacts on the land use in the event of incidents such as fuel spills, fires, water leaks causing flooding or other extreme events</i> ' during operational phase. 1. In section 5.1.2, the above impact is assessed as 'major' while in section 6.1, the said impact prior to the implementation of mitigation measures is assessed as 'moderate'. 2. In section 6.1 the said impact is also assessed during the construction phase, however is not listed in section 5.1.1 (related to construction phase).	1. Noted and revised 2. Reference to the construction phase has been removed from the table in Section 6.1	Revisions noted.	-	-
42.	5.2.1	216	Reference is made to viewpoints 1, 2, 6 and 7 with regards to landscape. The EIA states that ' <i>The cumulative effect of these overlapping construction activities is expected to degrade the character of the surrounding agricultural land near the landfill, leading to significantly adverse landscape impacts for these viewpoints.</i> ' Assess the likely impact significance as per table 6.2.	Noted and revised.	Noted.	-	-
43.	5.2.1	216- 217	Reference is made to viewpoints 3, 4 and 5 with regards to ' <i>visible construction machinery, potential</i>	Noted and revised.	Noted.	-	-

			<i>dust dispersion and associated non-visual impacts such as noise and vibration.</i> The impact is assessed as <i>'The cumulative construction activities across the TTF, MRF, WtE, and OPP facilities will result in significant adverse effects on the landscape for these locations.'</i> The likely significant effect is to be assessed as per table 6.2.				
44.	5.2.1	217	Reference is made to <i>'Given the combined visibility of the TTF, MRF, WtE, and OPP construction activities, the overall impact on both visual amenity and landscape quality is substantial'</i> Assess the likely significant effect of the above.	Noted and revised	Noted.	-	-
45.	5.2.2	217	The likely impact significant of the following is to be assessed: <i>'Despite the above efforts, the structural elements are expected to induce certain adverse landscape and visual impacts.'</i>	These are explained in the following sentences.	Noted.	-	-
46.	5.2.2	220	Reference is made to <i>'At Viewpoints 3 and 4, the TTF building will be observable from the immediate landscape, while at Viewpoint 5, it will be visible to daily commuters along Triq il-Kosta. The ongoing construction activities across all three waste management facilities will also create notable adverse effects from these viewpoints.'</i> Include the impact assessment in Section 5.2.2 and the missing void spaces in table 6.2.	Table in Section 6.2 has been filled in as requested. The text in section 5.2.2 has been revised.	Noted.	-	-
47.	5.2	/	Viewpoints with superimpositions are to be included within the coordinated assessment.	These are included in Section 4.2.3.	Noted.	-	-
48.	5.3.1	220	It is stated that the volume of excavated material <i>'will range between 16,800 and 29,300m³, whereas section 2.4.8.2 states that 'The excavation phase is expected to generate 8,640m³ of rock material.'</i> Clarify said discrepancy.	The text has been revised accordingly.	Noted.		-
49.	5.3.1	220	Reference is made to <i>'The amount of excavation rock will vary according to the designed layout; it will range between 16,800 and 29,300m³'</i> In the preliminary sections of the EIA a preferred layout was determined. In this regard, said impact is to be assessed in line with the preferred layout.	Noted and revised.	Noted.	-	-
50.	5.3.1	220	The EIA Report states that <i>'The likelihood of reusing this material free of contaminants is discussed as part of this EIA in compliance with ERA requirements.'</i> A clarification is required how and where said material will be re-used.	The text has been revised to explain that the material is suitable for backfilling on site.	Noted.	-	
51.	5.3.1 6.3	221	Section 6.3 refers to impacts related to spillages during construction. Said reference is to be also described in section 5.3.1.	Added.	Noted.	-	-

52.	5.3.2	222	Kindly provide a full list of air pollutants related to the actual emissions profile of waste incineration.	This falls outside the scope of this chapter. For further information on the emissions profile, kindly refer to the introductory chapters and air quality chapters. Section 5.3.2 has been revised accordingly.	Noted.	-	-
53.	5.3.2	222	Reference is made to liquid emissions. The said impact assessment is not included in section 6.3	Included.	Noted.	-	-
54.	5.3.2 6.3	222	Section 6.3 refers to impacts related to soil quality. Said reference is to also be included in Section 5.3.2.	Added.	Noted.	-	-
55.	5.4.1	223	Sections related to excavation, storage and machinery are more related to the Geology, Geomorphology, hydrogeology and soil Section. It is also noted that said impacts were not included in the summary of impact tables (neither in section 6.3 nor 6.4).	Noted and revised.	Noted.	-	-
56.	5.4.1	223	Reference is made to ' <i>Storage of excavated stone material and soil.</i> ' and ' <i>Storage of contaminating substances.</i> ' Provide an indication of where the said material will be stored.	This probably be stored on the location of the main plant. This material would be used almost as soon as retaining structures are constructed, which structures, being "underground," (to the finished scheme) should precede the works on the main buildings.	Noted.	-	-
57.	5.4.2	224	The EIA Report outlines that ' <i>In the absence of mitigation measures aimed at reducing the risk of contamination of water bodies, potential impacts arising from the operation of the proposed TTF can be listed as follows:</i> ' The Impact assessment is not included. This should be in line with the summary of impacts table in section 6.4.	Revised.	Noted.	-	-
58.	5.4.2	224	Groundwater salinization is assessed to be major adverse, whereas in section 6.4 the said impact is assessed to be moderate adverse. Amend accordingly.	Amended.	Noted.	-	-
59.	5.5.1	226	Reference is made to the trees and protected species to be impacted. The likely significant effect is to be assessed.	Noted and revised.	Noted.	-	-
60.	5.5.1	226	Footnote 29 outlines ' <i>Additionally, an area to the South of the TTF proposed site is earmarked for relocation of mature specimens particularly of Ceratonia siliqua (Carob trees)</i> ' A clarification is required whether this refers to the same area mentioned in 4.5 page 150. Said areas are to be marked on a site plan.	Not the same area. Further details will be provided once such details are formulated through the submission of an environmental permit for the relocation of protected trees.	Noted.	-	-
61.	Figure 115	228	Reference is made to ' <i>landscaped embankment</i> '. Clarify this term.	This area shall comprise of natural terrain (backfill material & soil) to	Noted.	-	-

				accommodate various soft landscaping elements of the project.			
62.			With regards to the proposed landscaping, it is believed that this should be elaborated further.	The landscaping details are currently defined in Section 5.5.1. The applicant intends to transplant some of the species present on site to reduce the ecological impact. The majority of the trees present on site comprise of mature Carob trees which are typically difficult to transplant. Other species such as Lentisk trees and Olive trees are easier to transplant. The landscaped embankment may be used to accommodate some of the transplantable trees, although the applicant may also opt to transplant these species elsewhere within the ECOHIVE complex. Further details will be provided to ERA closer to when such interventions will be carried out. Since the interventions involve interventions on protected trees, the applicant will be submitting an environmental permit application prior to the commencement of works to detail how the transplanting and uprooting of trees will be conducted.	Noted.	-	-
63.	5.5.1	229	Reference is made to ' <i>There are no expected impacts on marine species as a consequence of the construction activities currently proposed.</i> ' What about indirect impacts from runoff?	The site is at a substantial distance from the nearest coastal area. Additionally, the contractor will be obliged to collect all runoff generated during the construction period. Therefore, runoff incidents are not expected to occur regularly or at a scale which would impact the marine environment.	Noted.	-	-
64.	5.5.1	229	Reference is made to ' <i>The conversion of agricultural land, removal of soil, and dismantling of rubble walls lead to irreversible damage to all ecological characteristics linked to the habitat types found within the Area of Interest (Aoi). This impact is particularly relevant to the flora and fauna which typically inhabit agricultural soil and rubble walls, particularly soil fauna and stationary species.</i> ' Include impact assessment and include in the summary of impacts table (table 6.5).	Stated as separate impacts and included in the summary of impacts table accordingly.	Inclusion in table 6.5 has been noted. Impact significance has not been included in 5.5.1	Noted and included.	Noted.

65.	5.5.1	229	Impacts related to Natura 2000 site are not included in the summary of impacts table (table 6.5).	There are no foreseen impacts of the development on Natura 2000 sites due to the considerable distance between the site and the nearest protected site, and strict mitigation measures in place. This point is now stated explicitly in the impact assessment, however it is not included in the summary of impacts as no impacts are expected.	Noted.	-	-
66.	5.5.1	229	Impacts related to rainwater runoff are not included in the summary of impacts table (table 6.5).	Added	Noted.	-	-
67.	5.5.1	229	Impacts related to construction vehicles are not included in the summary of impacts table (table 6.5).	Added	Noted.	-	-
68.	5.5.1	230	Impacts related to light are not included in the section 5.5.1.	Added dedicated section and parsed lighting from noise and vibration impacts for the construction phase in the summary of impacts table.	Noted.	-	-
69.	5.5	/	The assessment should also take into consideration the construction of the road around the facility to connect the facility with the ECOHIVE complex internal road network.	The construction of the access road was assessed as an essential component of the building construction, with comparable impacts to the same. Several iterations were designed to minimise the footprint to the minimum possible while allowing for an efficient flow of activities and vehicular traffic within the TTF. No further mitigation is deemed necessary in this regard.	Noted.	-	-
70.	5.5.2	231	The EIA Report states that <i>'To safeguard human health from these adverse effects, the European Commission has developed the Best Available Technology (BAT) document for Waste Incineration in accordance with the Industrial Emissions Directive 2010/75/EU.'</i> Kindly elaborate further. While the BAT document for Waste Incineration provides key guidance, other critical factors must also be considered, such as determining the appropriate stack height to ensure effective dispersion of emissions and compliance with S.L.549.59.	The quoted text is considered adequate for the ecology chapter. As described in the subsequent text, the modelled scenarios resulted in a 'not significant' impact with the exception of one SR (minor adverse, cumulative). Further detail is provided in the Air Quality chapter.	Original comment still stands.	Text has been revised.	Noted.
71.	5.6.1	231	Include the likely significant impact on avifauna during the construction phase.	Included	Impact significance has not been included. This needs to be in line with the summary of impacts table 6.6.	Updated.	Amendments noted.
72.	5.6.2	/	Include the likely significant impact on avifauna during the operational phase.	Included	Impact significance has not been included. This needs to be in line with the summary of impacts table 6.6.	Updated.	Noted.
73.	5.6.2	235	Impacts related to the release of pollutants are to be included in the summary of impacts table (Table 6.6).	Included	Noted.	-	-

74.	5.6.2	236	Reference is made to ' <i>Additionally, the slag and bottom ash can have hazardous components as well. Fly ash residues would be temporarily stored before being exported, since there are no facilities for the treatment of such waste in Malta.</i> ' The location for the temporary storage of the slag and bottom ash is to be marked on a site plan.	Kindly refer to reply given to Reply 22.	Kindly refer to reply given to Reply 29.	Noted.	Noted.
75.	5.6.2	237	Reference to potential risk and risk of fire is to be included in the summary of impacts table (Table 6.6).	Risks from accidental fires relate to the release of pollutants, which is already in the summary of impacts table. The authors have specifically listed accidental fires in the relevant field in the table to clarify this.	Said inclusion was not made in Table 6.6.	Updated.	Noted.
76.	5.7	/	Include the likely significant impact on agriculture during both the construction and operational phases.	Included.	Noted. Kindly include the impacts related to the operational phase in Table 6.7	Updated.	Noted.
77.	5.8.1	242	The Coordinated Assessment states that ' <i>To conclude, the results of this study show that there will be a direct and adverse impact on the archaeological and cultural features identified in this study with minimal or no direct impact on the known cultural features present at the limit of the Aol.</i> ' Clarify how in Table 6.8 the loss of features and change in the context and cultural landscape during excavation works is assessed to be major adverse.	Revised.	Revision has been noted.	-	-
78.	5.8.1	/	Section 6.8 also outlines the impacts of potential damage to cultural and/or archaeological features below the ground. Said impact was not assessed in Section 5.8. Also when noting that the soil was cleared from the site, thus any potential archaeological features uncovered, how is it that the overall impact significance is assessed as major?	Noted and amended.	Revision noted.	-	-
79.	5.9.2	/	Include the impact assessment for each impact type, taking into account the contents of Table 6.9.	Added.	Reference is limited to PM10 and NO2. Kindly make reference to all emissions from the stack.	Text revised.	Noted.
80.	Figure 116 - 120	244 - 248	A clarification is being sought on the abbreviation 'MTTF'.	All text making reference to the proposed thermal treatment in Maghtab has been revised to TTF. The quoted figures have also been amended to TTF.	Noted.	-	-
81.	5.12	263	In the said document there is nothing regarding energy efficiency. It is to be noted that: a) BAT Energy efficiency should be followed	Noted and revised. Kindly note that the facility will operate at max 3% dry wt TOC Content and max 5% loss on	On energy efficiency, the operation is to meet the requirements of BAT 19 as mentioned in page 247.	Noted.	Kindly amend in section 5.12.1.

			b) BAT- AEPL indicated in waste incineration is to be followed. c) Is there an identified use for the heat generated from the process?	ignition, meaning that the BAT-AEPL is followed (Best Available Techniques – Associated Performance Emission Level, as described in Section 3.3.2 of Commission Implementing Decision 2012/119/EU). Note that the kilns will be of the non-slugging type.	Noted on the comments regarding BAT 14, to note that this parameter is related to combustion efficiency more than energy efficiency.		CONSULTANT Reply: Amended. ERA reply: No further comments at this stage. The installation of the heat recovery boiler referenced in Section 5.12.1 is noted (BAT 19). The applicant is to take note of the additional techniques listed under BAT 20 and ensure that the BAT-AEEL for the incineration of hazardous waste is complied with.
82.	5.12	/	Include impacts related to climate change and climate change adaptation in the summary of impacts table.	Added.	i. The addition of table 6.12 is noted. ii. Include the impact assessment for each impact type, taking into account the contents of Table 6.12 iii. Table 6.12 refers only to direct impact, while in section 5.12.1 reference is also made to indirect impacts on climate change (i.e. urbanisation in the rural area).	i. – ii. Updated iii. Updated Table 6.12 to refer to an indirect impact	i. – ii. Noted. iii. Noted.
83.	5.12	/	Compare in terms of climate change, the Marsa facility vis a vis the new TTF at ECOHIVE.	Added.	Noted.	-	-
84.	5.12.2	264	Reference is made to ‘By diverting waste from landfills, the TTF helps reduce methane emissions, a potent greenhouse gas. Methane is produced when organic waste decomposes in anaerobic conditions, such as those found in landfills.’ Clarification is required on the material being diverted from the landfills to the TTF.	Removed from Section 5.12.2 and revised in Section 5.12.1.	Noted.	-	-
85.	5.14	271	Include impact significance.	Added.	Noted.	-	-
86.	5	General	Include a section on the overall cumulative impacts.	Added in Section 5.15.	Include the impact assessment for each impact type, taking into account the contents of Table 6.13.	Updated	Noted.
87.	6	General	Include a summary of impacts table related to cumulative impacts.	Included	Refer to comment 79.	Updated.	Noted.

88.	7.1	295	Ensure that the mitigation measures listed in this section are listed in the summary of impacts table.	Revised.	Noted.	-	-
89.	7.1	295	Reference is made to <i>‘However, all indirect impacts related to the construction phase will be reduced to minor significance should the aforementioned mitigation measures be in place’</i> Impacts listed in Table 6.1 are all assessed as ‘direct’. A clarification is required on what the indirect impacts are.	Reworded.	Noted.	-	-
90.	7.2	295	Include the residual impact significance.	Added	Noted.	-	-
91.	7.3	297	Include the residual impact significance.	Added	Noted.	-	-
92.	7.3	297	Ensure that all mitigation measures listed in section 7.3 are also included in the summary of impacts table (Table 6.3).	Added	Noted.	-	-
93.	7.4	298	Include the residual impact significance.	Added	Ensure that the residual impact significance for each impact type is included, taking into account the contents within the tables under section 6.4	Updated	Noted.
94.	7.4	300	The measures identified to be included in the monitoring programme can also be considered as mitigation measures. In this regard include the relevant ones as mitigation measures.	Revised as relevant.	Noted.	-	-
95.	7.5	301	Ensure that all mitigation measures listed in section 7.5 are included in the summary of impacts table (Table 6.5) and vice versa.	Added	Noted.	-	-
96.	7.5	/	Include the residual impact significance.	Added	Noted.	-	-
97.	7.6	/	Include the residual impact significance.	Added	Noted.	-	-
98.	7.6	304	Reference is made to <i>‘It can also be considered to financially contribute to restoration and habitat protection projects by other entities both at land and at sea.’</i> This is also remarked in the Air Quality Technical Study in Section 5.1 where the following is being stated: <i>‘It is highly recommended that an area of an equivalent size to that of the planned development is unsealed, where natural habitat can be restored and protected to compensate for the sealing and habitat loss caused by the planned development. This is especially important due to the cumulative effect of ongoing development in the Maltese islands with an increasing loss of natural or semi-natural open and unbuilt habitats and unsealed areas which contribute to a healthy avian assemblage. It can also be considered to financially contribute to restoration and</i>	This paragraph had been included erroneously and has thus been removed from the report.	Noted. However, kindly note that said mitigation/compensatory measure is still included in the Ecology Technical study.	Updated	Noted.

			<i>habitat protection projects by other entities (such as eNGOs) both at land and at sea.'</i>				
			Clarification on how the above can be attained.				
99.	7.6	305	Reference is made to 'Additionally, removing alien invasive plants from the wider area and replacing them with indigenous flora that provide food, shelter, and nesting habitat would also be advised.' Indicate how this can be attained.	This paragraph had been included erroneously and has thus been removed from the report.	Noted.	-	
100.	7.7	/	Include the residual impact significance.	Added	Noted.	-	-
101.	7.8	/	Include the residual impact significance.	Added	Noted.	-	-
102.	7.9	306	A clarification is required as to why 'the cumulative impact was assessed between the Marsa Thermal Treatment Facility built (MTTF) plant project with the Maghtab Waste to Energy Facility (WtE)', and not the cumulative impact from the newly proposed TTF and the WTE at the ECOHIVE Complex.	This was a typographical error. The cumulative assessment was done solely on the Maghtab Thermal Treatment Facility and the WtE plants. Text has been revised accordingly.	Noted.	-	-
103.	7.10	/	Include the residual impact significance.	Already included.	Noted.	-	-
104.	7.10	/	Ensure that all mitigation measures listed in section 7.10 are included in the summary of impacts table (Table 6.10) and vice versa.	Added	Noted.	-	-
105.	7.11	/	Include the residual impact significance.	Added	Noted.	-	-

B. Comments on the Non-Technical Summary (comments apply for both the English and Maltese version)

Ref No	Section	Page	ERA comment	Reply	ERA reply
1.	1.1	7	Include mitigation measures related to odour.	Added	Noted.
2.	1.1	7	Reference is made to "Initially, the development will run with one line, with the possibility of expanding operations to two lines to meet future demand". It is understood from the rest of the documentation that initially there will be two lines, with a possibility of expanding to three lines to meet future demands. Kindly update text to reflect the rest of the documentation.	Noted and revised.	Noted.
3.	1.2	8	The NTS outlines that 'The total quantity of excavated waste is expected to be approximately equal to 8,640m ³ ', whereas in the coordinated assessment Section 5.3.1, it is stated that the 'volume of excavated material 'will range between 16,800 and 29,300m ³ .' Clarify said discrepancy.	8,640m ³ is the correct figure.	Noted.
4.	2.2	8	With regards to the location of the site, it should be emphasised that the WMP recognised the need for consolidation of waste management project.	Included.	Noted.
5.	2.3	8	Reference is made to 'Any extra space will be reserved for future recycling technology upgrades, such as increased automation. These advancements would be evaluated for cost and reliability to ensure they improve the quality of the recycled materials.' A clarification is being sought in regard to the above as this was not mentioned in the coordinated assessment.	Removed from the NTS.	Noted.
6.	3	9	Include the impact significance. Reference to 'significantly adverse' should be amended to be in line with the impact significance criteria.	Added	Noted.
7.	5 - 12	18	Include the impact significance.	Included throughout.	Noted.
8.	13.5	20	Reference is made to 'The proposed MRF is slated to operate for 20 years' This is to be amended to reflect the project currently being assessed.	Revised	Noted.

C. Comments on the Technical Study – Material characterisation

Ref No	Section	Page	ERA comment	Reply	ERA reply
1.	2.1	7	Reference is made to 'The projected built-up area shall be of 16,659m ² while the remaining 1,526m ² of the site extension will remain unexcavated.' The above details are to be included in the coordinated assessment and marked on a block plan.	This sentence has been removed from the Material Characterisation report.	Noted.
2.	2.1	7	Reference is also made to 'It is therefore likely that the total excavated volume standing at about 8,700m ³ will be backfilled to reach the projected ground level.' This is to be confirmed vis a vis section 5.3.1 of the EIA Report.	Figure updated.	Noted.
3.	2.2	9	Further information regarding the chemical analysis is to be included in the coordinated assessment.	Included additional information in Section 2.4.8.2 of the CA	Noted.
4.	2.3	10	Further information regarding the HP criteria assessment is to be included in the coordinated assessment.	Included additional information in Section 2.4.8.2 of the CA	Noted.

D. Comments on the Technical Study – Land Cover and Land Uses

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply
1.	5.1.2	29	Reference is made to ' <i>The operational phase may give rise to further impacts on the land use in the event of incidents such as fuel spills, fires, water leaks causing flooding or other extreme events which will only constitute indirect impacts from the site operations and can be substantially mitigated and/or prevented in their entirety. For this reason, the potential impacts are considered of remote probability, but potentially major significance, which will be reduced to minor residual significance if the appropriate Emergency Response Plan is in place.</i> ' 1. As per S.L. 549.81 appropriate measures are to be in place for the containment of contaminated fire-fighting water. 2. Mitigation of fuel spills from storage tanks or pipelines is to be in place in accordance with standard ERA requirements.	1. The following sentence is included in the technical requirements for the project: <i>In case of fire used fire water shall be led to the leachate pit and from there pumped to the water resource tank.</i> 2. Standard mitigation of fuel spills are in place and will be formulated in greater detail during the IPPC permit process.	Noted, Building design considerations listed ISO/TR 26368:2012 Environmental damage limitation from fire-fighting water run-off is encouraged.	Noted	Noted.

E. Comments on the Technical Study – Geology

Ref No	Section	Page	ERA comment	AIS Reply	ERA reply
1.	General	/	1. The list of potential pollutants from waste incineration is broader than as described in this version of the document. The required mitigation and operational requirements is broader than the SNCR described in this section. 2. Clarify from which process can sludge be generated. 3. What operational measures will be in place to contain and potentially treat the leachate? 4. It is to be ensured that appropriate measures are in place such that potentially contaminated rainwater runoff is kept separate from clean rainwater runoff. 5. As per S.L. 549.81 appropriate measures are to be in place for the containment of fire-fighting water.	1. The list has been revised and generalised as the scope of this chapter is not to discuss the air quality impacts and mitigation measures in detail. 2. This can be generated from the liquid waste tank storage. 3. Leachate may be generated from wastes stored on site. This liquid will be contained in tanks and/or in bunded/impermeable areas. 4. Kindly refer to the detailed descriptions on water management outlined in Section 2.4.3 of the CA report. 5. Refer to Section 2.4.3 of the CA report.	Noted.

			6. Appropriate measures are to be in place to prevent dust emissions from bottom-ash and fly-ash handling.	6. Bottom ash and fly ash will be handled in enclosed silos/area thus limiting the likelihood of dust emissions.	
2.	5.1	30	Reference is made to the construction phase, as broken down in 7 phases in section 5.1. It is recommended that said outline of the phases is included in the coordinated assessment.	Noted and included in Section 2.4.5 of the CA report.	Noted.
3.	5.1.1	30	Reference is made to <i>'The amount of excavation rock will vary according to the designed layout; it will range between 16,800 and 29,300m³.'</i> This is to be in line with the volumes quoted in the EIA Coordinated Assessment.	Revised.	Noted.
4.	6.2	35	<i>'Treatment of wastewater prior to reuse or discharge into the environment might be required.'</i> It is understood from the described process as if the process water will be circulated indefinitely with no discharge whatsoever. Clarifications in this regard are required.	Wastewater will not be discharged into the environment. Statement removed.	Noted.
5.	6.2	35	Reference is made to 'Further details on mitigation measures to be implemented during the operation of the TTF are available on the Technical Requirements report.' The Technical Requirements report is to be made available.	The statement has been removed.	Noted.

F. Comments on the Technical Study – Water Bodies

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply
1.	8	37	- Appropriate site containment measures such as impermeability are to be in place to prevent contamination to the underlying bedrock. - It is to be ensured that appropriate measures are in place such that potentially contaminated rainwater runoff is kept separate from clean rainwater runoff - As per S.L. 549.81 appropriate measures are to be in place for the containment of fire-fighting water.	- All work/unloading/discharge areas where spillage may occur or where washing up and cleaning would be required are bunded and water resulting would be considered contaminated and treated accordingly. - Similarly, all storm water collected from the road network and from areas where vehicles stand shall be considered as contaminated water, transferred in the leachate pit and treated in the same manner. The only storm water that is considered uncontaminated shall be that collected off the roofs of the various buildings. This is collected separately in the rain water pond. - The following is included in the contractor's technical requirements: <i>In case of fire used fire water shall be led to the leachate pit and from there pumped to the water resource tank.</i>	Noted, Building design considerations listed <i>ISO/TR 26368:2012 Environmental damage limitation from fire-fighting water run-off</i> is encouraged.	Noted	Noted.

G. Comments on the Technical Study – Ecology

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply
1.	4.2.5	32	Reference is made to ‘Terrestrial Ecology Baseline Study and Impact Assessment in relation to the removal of soil in areas within the ECOHIVE Complex’. It should be noted that the Terms of Reference issued by the Authority were solely for the preparation of a baseline study.	Noted and revised.	Refer to comment in Coordinated assessment.	Updated.	Noted.
2.	4.2.5	32	Reference is made to ‘The assessment addressed Terms of Reference for a terrestrial ecology baseline study and impact assessment (EclA) as put forward by the Environment and Resources Authority in July 2022.’ It should be noted that the Terms of Reference issued by the Authority were solely for the preparation of a baseline study.	Noted and revised. The study is annexed to the Ecology TS	Refer to comment in Coordinated assessment.	Updated.	Noted.
3.	4.2.6	35 - 36	Reference is made to the inclusion of the broad-brush (marine) habitat survey. It is unclear as to why said study has been included in this report in view that the proposal does not envisage encroachment/ works on the marine environment.	The Method Statement agreed with ERA states: “ <i>The assessment of impacts on the marine area will comprise a desktop study. The consultant shall carry out a thorough literature review of readily available data and previous studies within the relevant marine protected areas. Additionally, the management plans of each protected area (where available) shall be consulted.</i> ” This was done following the ERA’s insistence to include a specific section on the marine environment during discussions on the MS. This explains why the broad-brush marine habitat survey from previous EIAs in the area was included in the report.	Refer to comment in Coordinated assessment section.	The impacts from runoff and the stack on the marine environment are now included	Noted.
4.	4.3.1	37	Reference is made to ‘ <i>Between the proposed site and the ECOHIVE complex lies a narrow plot of land which is currently dominated by invasive species such as Arundo donax.</i> ’ Identify said area on a block plan.	This area is marked in the Doublet & Zammit (2022) habitat map, as “Disturbed ground occupied by Ermes and Ruderal Communities” in brown. The photo showing the Arundo donax next to the Anaerobic Digestion plant is located at the south eastern boundary of the existing plant.	Noted.	-	-
5.	5.2.3	55	A clarification is being sought on the abbreviation ‘MTTF’.	Reworded.	Noted.	-	-

H. Comments on the Technical Study – Air Quality technical study

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply
1	/	/	The rationale for using 2021 meteorological conditions instead of 2024, given that the project is scheduled for this year.	Initial modelling efforts were carried out in previous years to determine the optimal stack height for the Thermal Treatment Facility (TTF), using the air dispersion model from the Waste-to-Energy EIA. In the 2024 modelling exercise that was presented in the EIA, the same 2021 dataset was employed. This decision was based on the continuity and integration with earlier modelling frameworks, as well as the fact that annual variations in local meteorological conditions are typically minimal. Consequently, the modelling team determined that the 2021 dataset remained representative and scientifically valid for the current analysis.	Noted.	-	-
2	/	/	Provide reasoning behind selecting Luqa as the weather station for meteorological data when Selmun may have been more suitable based on the site’s characteristics.	The air dispersion models for the WtE plant had considered meteorological data from the Luqa station; therefore, no additional weather stations were considered for the assessment of the adjacent	Noted.	-	-

				facility. In the absence of specific guidance or instructions at Method Statement stage, we adopted the same data sources and methods used in earlier assessments. Selmun can be considered in future studies if required.			
3	/	/	A justification for the use of unverified air monitoring station data is to be provided. ERA recommended confirming Saharan events using satellite imagery rather than assuming that high readings at ERA's stations are due to such events.	Following the acquisition of baseline monitoring results, PM₁₀ concentration data were retrieved from ERA's website (https://era.org.mt/air-quality-widget/) to evaluate trends observed across the four meteorological stations located in Maltese territory. Several peak concentrations were recorded concurrently at all four sites. These peaks were subsequently cross-checked against laboratory results. In addition, forecasts from the Barcelona Dust Regional Centre (Daily Dust Products — WMO Barcelona Dust Regional Center (aemet.es)) were consulted, which indicated a high likelihood that the elevated PM₁₀ levels measured on the 3rd, 9th and 10th of October were attributable to the presence of Saharan dust. It is also important to note that on 5th November, the team contacted ERA to request validated data for the sampling period. However, we were informed that, due to internal technical issues, the validated data were not available at that time. The report has been integrated with the above.	Noted.	-	-
4	1	8	Reference is made to 'All simulations were conducted by considering the optimal height of the stack at 25 meters defined on the basis of the results of a previous study which compared three chimney stack heights for the MTF, at 25m, 30m and 35m respectively. The study had revealed that there were no significant variations in the impacts on air quality for the three different stack height scenarios, and thus the designers opted for a shorter chimney stack to minimise visual impacts and associated costs.' The study referred to above is to be submitted. Such information should be included in the coordinated assessment in the alternatives section.	Section added in the CA. Study is annexed to the Air Quality TS.	Noted.	-	-
5	2.9.8	41	1. Sodium bicarbonate is typically used for acid gas removal (such as HCl and SO₂), not for NO_x reduction. 2. If NO_x abatement were achieved using a bag filter, it would need to be a catalytic bag filter, where a catalyst is embedded in the filter material. There is no indicated that catalytic bag filters will be installed. Please clarify. 3. To note flue gas recirculation is not a primary method for reducing dioxins and furans, as it could reintroduce gases into temperature ranges that promote dioxin formation. 4. Reference is made to "must be computed based on the assumption that they operate at maximum input load 24 hours a day for an entire year", kindly clarify whether the volumetric flows on page 8 constitute the summation of both lines. 5. The document should reference that the indicated levels are 'worse-case scenario levels' and that the plant is	1. Correct. Report revised. 2. NO_x abatement will be achieved with Selective Non-Catalytic Reduction process which by means of injection of a liquid reagent (ammonia or urea) in the secondary combustion chamber 3. Noted and revised accordingly 4. The simulations were carried out by considering the simultaneous operation of two lines, therefore the sum of the two flows. 5. It is important to highlight that Scenario C is already designed to reflect the worst-case operating conditions, as it considers an abnormal scenario where dust concentration limits reach 150 mg/Nm³ at the stack, as per the regulation. This scenario represents the most extreme operating conditions and thus adequately addresses the need to ensure compliance under all circumstances, not just during maximum operation.	Noted.	-	-

			required to meet the strictest limits set out in the legislation and the BAT documents. That being said it should also be noted that the dust levels during abnormal emissions as was previously discussed has not been studied- so technically the 'worst case scenario' has not be studied.				
6	3.2	54	Confirmation that the risk-based approach to identify the sensitive receptors was based on 2023 pollution levels, given that the text is referring to 2023 but table 6 is referring to 2019 levels.	Revised table to 2023.	Noted.	-	-
7	3.4	71	/	/	Reference is made to 'cannot be exceed on more than 35 calendar days'. This should read 'cannot be exceeded more than 18 times per calendar year'.	Updated	Noted.
8	Tables 11 & 12	76	Kindly amend the units to µg/m³ for consistency.	We have maintained the units as provided in the ERA TORs.	Noted.	-	-
9	3.9	100	Reference is made to 'Specifically, the cumulative impact was assessed between the Marsa Thermal Treatment Facility built (MTTF) plant project with the Maghtab Waste to Energy Facility (WtE).' A clarification is required to why the cumulative impact was assessed between the Marsa Thermal Treatment Facility built (MTTF) plant project with the Maghtab Waste to Energy Facility (WtE) and not the cumulative impact from the newly proposed TTF and the WTE at the ECOHIVE Complex.	This comment refers to a typo referred to in one of the earlier comments. The cumulative assessment was carried out on the proposed TTF at Maghtab.	Noted.	-	-

I. Comments on the Technical Study – Noise Technical study

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply
1.	6.1	23	Please ensure consistency throughout the report in the description of NSR 3 and 4. For example, in Figure 5 (page 17), NSR03 represents the Nature Reserve and Hotel Salini, whereas in Tables 11 and 16, NSR03 represents the beach area and Nature Reserve.	Detail has been added to Section 6.1 and Tables 8, 9, 10 and 18 to clarify which monitoring locations are representative of each NSR. The monitoring locations (as shown in Figure 5) have not been renamed as the information is referenced from a previous report.	Noted.	-	-
2.	7.2.4	33	Kindly provide justification for the use of 3 as a reflection factor.	BS 5228 and IO 9613.2 do not explicitly define reflection orders to be used within calculations. CadnaA calculates reflections applying time-efficient algorithms to detect all possible ray paths	Noted.	-	-

				up to the order specified. However, the required computation time increases with increasing order of reflection and with increasing number of reflective objects. Therefore, it is considered that higher reflection orders should be used only with limited scenarios comprising a fewer number of objects. A reflection order of 3 has been selected to include for the calculation of multiple reflections whilst ensuring that the computation time remains reasonable.			
3.	8.2	39	Reference is made to <i>'For the closest residential receptors, the operational rating level has been predicted to be below the daytime and night-time background sound levels and as such, this results in no significant effect. For the closest ecological receptors, no significant effect has also been determined. Therefore, no mitigation measures (other than those embedded within the design of the Scheme) are considered necessary and no residual effects are predicted.'</i> As per BAT 17 of the CID 2019/2010 the construction of the facility is to make use of low-noise equipment and ensure appropriate noise mitigation is featured at design stage.	Reference to BAT 37 (which relates to noise) has been made within Section 8.2.	Noted.	-	-
4.	Table 24	44	Kindly clarify why the Organic Processing Plant (OPP) is not considered as part of the cumulative operational noise level. If the OPP impact is yet to be included in the total cumulative assessment, Table 24 and the conclusion section should be revised accordingly.	The OPP has now been included within the assessment of cumulative operational noise. The OPP is now included at Table 24, assessed in Section 6 and considered within Sections 9.2.1, 9.2.2 and Section 10 (Conclusions).	The IC2 development should not be added as part of the cumulative operational noise assessment considering that no noise impact is envisaged from this development during the operational phase. Furthermore, the EIA noise study assessed only the construction noise impact. Kindly revise total cumulative as part of this amendment.	The IC2 development has been removed from Table 24, subsequent Tables and assessment.	Noted.
5.	9.2	44	The impact of MRF facility was considered and included in the assessment, however said data has not yet been submitted to the Authority. In this regard, kindly include supporting documents.	This information will be submitted shortly.	Noted	-	-

6.	Table 25	46	/	/	Kindly add a rating level of (+3) to the night-time specific sound levels, in order to align with the outcomes of the qualitative studies for the OPP and WtE facilities. Although no rating penalties were concluded for the TTF and MRF during night-time, it is considered likely that these rating levels will be present on site once all facilities become operational. In this regard, kindly revise the results using the corrected figures for the cumulative levels (deducting IC2) and including the night-time rating penalties. As a result of these amendments the consultant needs to revise the conclusions, including revision to the bullets.	In accordance with BS 4142:2014+A1:2019, the cumulative specific sound level associated with the proposed developments has been calculated at 40 dB. This is 7 dB below the measured night-time residual sound level of 47 dB at NSR01 and -19 dB below the residual level of 55 dB at NSR02. Given this significant margin, the specific sound is not expected to be readily distinguishable from the residual acoustic environment. In this case, the cumulative sound level is sufficiently masked by the residual sound, and no distinctive acoustic features are anticipated. Therefore, a character correction of +3 dB is not applicable. With regard to the WtE, a +3dB correction was applied to the night-time specific levels, to account for the stack as potentially distinctive against residual sound levels. However, this correction was applied as a precautionary measure; interrogation of the noise model indicates a specific level of only 25 dB from the stack, which is 22 dB below the residual night-time level at NSR01 and very unlikely to be audible. Therefore +3 dB has not been applied to the cumulative specific level for the night-time. * Supplementary feedback received via email dated 16th December 2025.	The justification provided would only fully apply if the assessment followed the BS 4142 methodology as intended, where the specific sound level is derived from actual monitoring and calculated by subtracting the residual from the ambient level. In this case, the specific sound was not measured because the facilities are not yet operational instead, it was based on literature and modelling assumptions. When all plants become operational and cumulative noise levels are assessed, the evaluation must include any applicable rating corrections for all facilities and be compared against the background sound level, as required by BS 4142. This is essential for determining the true impact on sensitive receptors. Given that the +3 dB adjustment for the WtE was included as a precautionary measure to assess the worst-case impact from the stack, it is noted that the noise level from the stack is 22 dB below the residual night time level at NSR01. In this regard, it is unlikely that the background level will be exceeded due to the character correction. Any further mitigation measures will be determined based on the outcome of the noise monitoring study under the IPPC permit, once all sites are fully operational.
7.	9.2.1	47	/	/	Bullet 1. In view of the above night-time revision, consultant, kindly justify further the worst case scenario and where applicable provide mitigation measures for NSR01 during night time.	In view of the above, further mitigation measures are not considered to be necessary.	Noted as above.

* Supplementary feedback received via email dated 16th December 2025.

Following on from our meeting with the ERA, here is further information to explain why the addition of a +3dB correction at night is not warranted. It is noted that for the TTF, WtE, MRF and OPP, a +3 character correction was added for HGVs during daytime but not the night-time as they will not operate at night.

The tables below show Cadna outputs for NSR01 at night, ranked in order of contribution, for the TTF, WtE and MRF. The outputs show the contribution of each noise source to the specific level (note, not all sources are show in the tables as some contribution nothing at all).

Regarding the OPP, we do not have access to the model but based on source information contained within the EIA, would expect similar contributions.

The Cadna outputs below show that all sources individually are below the background LA90 level of 36 dB (at NSR01) and well below the ambient LAeq,T level of 47 dB. There are no sources that are prominent/dominant against the ambient noise environment. Therefore, we do not consider it necessary to apply a character correction.

Additionally, if a +3 dB correction is applied, then this will provide a difference between the cumulative rating level and background level of +6 at NSR01. However, this amount of excess would be due to the character correction, not any particular sources. Given that contributions are so low from many sources, there is no practical or reasonable mitigation solution.

TTF Night NSR01

Partial Level				
Close	Sync. Graphic	Copy...	Print...	Font... Help
Source			Partial Level (dB(A))	
Name	M.	ID	NSR01	
			Day	Night
Roller_Door_assume_open		Roller_Door	26.8	26.8
ACC	+	From_Marsa_TTF	25.8	25.8
Storage_Building	+	Storage_Building	25.0	25.0
Roller_Door_assume_open		Roller_Door	25.0	25.0
ACC	+	From_Marsa_TTF	23.5	23.5
Plant_Building		Plant_Building	21.9	21.9
Storage_Building	+	Storage_Building	21.5	21.5
Main_Stack	+	Main_Stack	21.1	21.1
Plant_Building		Plant_Building	19.7	19.7
Plant_Building		Plant_Building	17.2	17.2
Plant_Building	+	Plant_Building	16.1	16.1
Plant_Building	+	Plant_Building	15.9	15.9
Roller_Door_assume_open		Roller_Door	15.5	15.5
Plant_Building	+	Plant_Building	14.3	14.3
Plant_Building		Plant_Building	13.7	13.7
Plant_Building		Plant_Building	13.6	13.6
Plant_Building		Plant_Building	13.1	13.1
Plant_Building		Plant_Building	12.7	12.7
Roller_Door_assume_open		Roller_Door	12.5	12.5
Plant_Building		Plant_Building	11.7	11.7
Plant_Building		Plant_Building	9.1	9.1
Roller_Door_assume_open		Roller_Door	7.6	7.6
Plant_Building		Plant_Building	7.2	7.2
Plant_Building		Plant_Building	5.7	5.7
Roller_Door_assume_open		Roller_Door	5.7	5.7
Roller_Door_assume_open		Roller_Door	5.6	5.6
Plant_Building	+	Plant_Building	3.4	3.4

WtE Night NSR01

Nb. ST-03 = Stack

Partial Level				
Close	Sync. Graphic	Copy...	Print...	Font... Help
Source			Partial Level (dB(A))	
Name	M.	ID	P1-Residential	
			Day	Night
AV-04		AV_04	25.2	25.2
			23.5	23.5
ST_03		ST_03	22.2	22.2
AV-03		AV_03	22.2	22.2
Fg_01		Fg_01	20.8	20.8
			19.5	19.5
			19.3	19.3
			18.9	18.9
			18.7	18.7
Wheel Loader		Wheel_Loader	18.6	18.6
		WALLS_01_structural	17.7	17.7
			17.4	17.4
			16.8	16.8
			16.0	16.0
			15.8	15.8
			15.5	15.5
IBA_Pro_Walls		IBA_Pro_Walls	15.4	15.4
IBA_Pro_Walls		IBA_Pro_Walls	14.6	14.6
			14.1	14.1
			13.5	13.5
IBA_Pro_Walls		IBA_Pro_Walls	13.3	13.3
			11.4	11.4
			10.5	10.5
Mek_02		Mek_02	10.4	10.4
IBA_Pro_Walls		IBA_Pro_Walls	10.1	10.1
IBA_Pro_Walls		IBA_Pro_Walls	9.2	9.2
		WALLS_01_structural	8.8	8.8
			7.8	7.8
AV-01		AV_01	7.6	7.6
			6.4	6.4
			6.3	6.3
			5.9	5.9
IBA_Pro_Roof		IBA_Pro_Roof	5.7	5.7
AV-04		AV_04	4.2	4.2
AV-02		AV_02	2.5	2.5
			2.5	2.5
			2.3	2.3
			1.8	1.8
			1.6	1.6
			0.9	0.9

MRF Night NSR01

Partial Level				
Close	Sync. Graphic	Copy...	Print...	Font... Help
Source			Partial Level (dB(A))	
Name	M.	ID	NSR01	
			Day	Night
Compactor			33.5	33.5
Roller			21.0	21.0
Roller			20.2	20.2
Roller			19.4	19.4
Roller			18.8	18.8
Storage Area			18.5	18.5
Roller			18.3	18.3
Processing			17.8	17.8
Roller			17.7	17.7
Processing Area			17.6	17.6
Roller			17.2	17.2
Roller			16.8	16.8
Reception Hall			15.8	15.8
Reception Hall			15.5	15.5
Storage			15.4	15.4
Roller			9.3	9.3
Roller			7.3	7.3
Roller			6.0	6.0
Roller			1.1	1.1

J. Comments on the Appropriate Assessment

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply
1.	3.3	17	With regards to 'Impact significance (major/moderate/minor/negligible)' and 'Residual impacts (major/moderate/minor/negligible)', it should be noted that the impact significance criteria should be insignificant or significant.	Noted and revised.	Noted.	-	-
2.	4.1.2	20	Reference is made to the 'Terrestrial Ecology Baseline Study and Impact Assessment – Doublet and Zammit (2022)' As outlined in other sections above, the scope of the study was not to carry out an assessment but to carry out a baseline. Furthermore, reference to 'The scope of the report was to assess whether the schemes will cause impacts on protected sites and natural ecosystems, habitats and species.' is incorrect, in view that the report was to carry out a baseline limited to the terrestrial ecology for selected sites and not on protected sites. In this regard the AA is to assess the impact as a result of said proposal.	Noted and revised.	Refer to comment in the Coordinated assessment.	Updated.	Noted.
3.	4.1.2	20-21	Reference to 'The assessment addressed Terms of Reference for a terrestrial ecology baseline study and impact assessment (EclA) as put forward by the Environment and Resources Authority in July 2022' is incorrect, since ERA requested a baseline study and not an impact assessment at the time.	Noted and revised.	Refer to comment in the Coordinated assessment.	Updated.	Noted.
4.	4.1.2	24	Reference is made to 'Ecology study in relation to EA 0057/18 - Marine environment.' The inclusion of said study is not deemed relevant.	The Method Statement agreed with ERA states: "The assessment of impacts on the marine area will comprise a desktop study. The consultant shall carry out a thorough literature review of readily available data and previous studies within the relevant marine protected areas. Additionally, the management plans of each protected area (where available) shall be consulted." This was done following the ERA's insistence to include a specific section on the marine environment during discussions on the MS. This explains why the broad-brush marine habitat survey from	Refer to comment in Coordinated assessment.	Updated.	Noted.

				previous EIAs in the area was included in the report.			
5.	4.1.3	26	With regards to <i>'There are no Special Areas of Conservation within the scheme site or its Area of Interest. The closest protected areas under the Natura 2000 framework, which happen to be marine or coastal, are replicated in Figure 11.'</i> Reference should be made to the wide AOI in which an SAC is indicated – refer to figure 4 in the same document, section 4.1.3.3 and 4.1.3.5.	Noted and revised.	Noted.	-	-
6.	/ 4.14 (4.1.4.1 & 4.1.4.2)	33-34-46	Reference is made to section <i>'S.L.549.123 (Trees and Woodlands Protection Regulations)'</i> . The scope of the AA is to assess the impacts of species and natural habitats within a Natura 2000 site. In view that the site is not within a Natura 2000 site, said inclusion is not deemed relevant.	Removed.	Noted.	-	-
7.	5	/	Include impact significance which should assess impacts on the species, natural habitats and the integrity of the Natura 2000 site as a whole.	Noted and revised			-
8.	5.1.2 5.2.1	57	Said section is to include potential impacts resulting from runoff and deposition of chemicals from the plume.	Noted and revised.	Noted.	-	-
9.			/	/	ERA noted the removal of the removal of the following sections: • Section 5.1.3: the entire section on 'Temporary disturbance and reduction of habitat in the Aol-1' • the removal of 'Aol-1' from 'Light pollution due to night-time lighting (Aol-1 and Aol-2)' in section 5.1.3. • Section 5.2.3: the entire section on 'Permanent loss of habitat, reduction of habitat quality' In view that this sections relates to species that are avian species, kindly explain the removal of the above.	These sections have been removed since they refer exclusively to Aol-1. Aol-1 does not overlap or border any SPA sites and therefore removed from the AA. Aol-1 was retained in the Ecology TS and Coordinate Assessment reports.	Noted.
10.	5.4	/	The summary of impacts table is to be revised to include solely the impacts on the species, natural habitats and the integrity of the Natura 2000 site as a whole.	Noted and revised.	Original comment still stand.	Revised.	Comment still stand with relation to Loss of circa 85 tree individuals from the site, 50 of which are protected), thus reducing connectivity of N2K Sites

							CONSULTANT Reply: This impact has been removed from the Summary of impacts table.
							ERA reply: Noted.
11.	/	/	With regards to the following sections: - 'Impacts on terrestrial environment' – Section 5.1.1; - 'Mitigation for terrestrial environment.' – Sections 6.1.1 and 6.2.1; - 'Terrestrial residual impacts' – Section 7.1.1; - 'Terrestrial compensatory measures' - Section - 7.2.1; and - 'Terrestrial monitoring programme' - Section 7.3.1. The scope of the AA is to assess the impacts of species and natural habitats within a Natura 2000 site. In view that the site is not within a Natura 2000 site, said inclusion is not deemed relevant. The assessment should focus specifically on the impacts on the species, natural habitats within, and the integrity of the Natura 2000 sites.	Noted and revised.	Original comment also applies to section 4.1.2 and 4.1.4, in view that the site itself is not a Natura 2000 site. In this regard, kindly update the AA to include only the relevant sections.	Previous terrestrial surveys removed from Section 4.1.2 and Section 4.1.4	Noted.
12.	6.1.2	73	This is to be revised in view of the comment raised above vis a vis section 5.1.2.	Noted and revised.	Noted.	-	
13.	6.2.2	74	This is to be revised in view of the comment raised above vis a vis section 5.1.2.	Noted and revised.	/	-	
14.	7.2	76	Compensatory measures are to be included only in case when the residual impact significance following the implementation of mitigation measures is significant. In this regard, a clarification is required whether the measures listed in section 7.2 are compensatory or mitigation measures.	Section has been revised.	ERA notes that the reference to compensatory measures is omitted. However reference is still being made in the section title.	Revised	Noted.
15.	/	/	Kindly explain further the overall conclusion on the protected site's integrity, by linking such to the relevant conservation objectives of the site's management plans.	We have added concluding remarks under residual impacts with specific reference to relevant Natura 2000 sites.	Noted.	-	
16.	9	83	The conclusion is to be revised in light of the above comments, mainly but not limited to: - Omission of terrestrial environment not within a Natura 2000 site - Revision of mitigation/ compensatory measures - Inclusion also reference to Special Areas of Conservation	Noted and revised.	Noted.	-	

			- Inclusion of Site Specific Conservation Objectives - Conclusion whether the proposal is envisaged to affect the species, natural habitats and the integrity of the Natura 2000 sites as a whole.				
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2. Consultees’ Comments on EIA Report (09/03/2025- 09/04/2025)

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 1: Cultural Heritage Features in Close Proximity to the Development

Number	Name	Feature
1	Batterija tal-Għallis	Battery
2	Torri ta' Qalet Marku	Tower
3	Fdalijiet mill-Batterija ta' Qalet Marku	Battery
4	In-Ridott ta' Qalet Marku	Redoubt
5	In-Ridott ta' Bahar ic-Cagħaq	Redoubt
6	Kappella ta' San Pietru Sajjed	Chapel
7	Knisja tal-Madonna tal-Angli	Church
8	Statwa ta' San Pawl	Statue
9	Trundiera 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-Għorġhur Tal-Lemin	Searchlight Emplacement
14		Megalithic alignment
15		Megaliths
16		Tomb
17		Dolmen
18		Well
19		Cistern
20	Wied Faham Stop Wall	Stop Wall
21		Structural remains
22		Agricultural trenches
23		Quarry
24		Quarrying Marks
25		Rock-cut feature
26		Pottery Vessel
27	Torri tal-Għallis	Tower
28		Beachpost
29		Wall

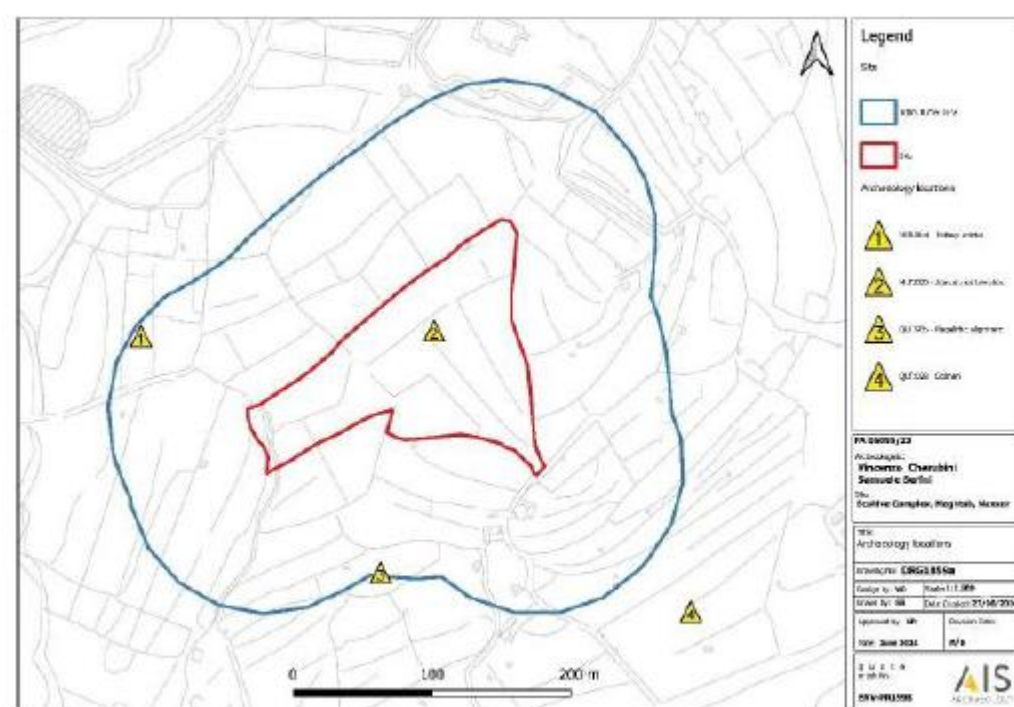
Figure 2: List Identifying Cultural Heritage Features in Close Proximity to the Development

Unfortunately, the specific TORS provided have not been used in the preparation of the reports on cultural heritage. Nevertheless, the Superintendence has assessed the information gathered in the course of the EIA.

Report on Architectural, Archaeological, Historical & Cultural Heritage and Related Material Assets

The Superintendence notes that the study includes a section on cultural heritage. This section does not make reference to the cultural heritage features in close proximity to the development provided by the Superintendence at TOR stage.

Nevertheless, the report gives an overview of the known cultural heritage features identified in the project's Area of Influence (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 Aol 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 (EIA) for a new Thermal Treatment Facility (TTF)

The Superintendence once again notes that the specific vantage points requested at TOR stage by the Superintendence were not included in the Landscape and Visual Impact Assessment in their entirety.

The Superintendence further notes that the viewpoint included from Trig ir-Ramla does not include the significant networks of fields as shown in the image below.



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 cognisance to the TORs as provided by the Superintendence

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

Comments	Reply
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 plans are established and maintained. No hazardous waste or any other waste which can be a source of odour pollution should be left in the open air exposed to all external elements. Any national and EU standards and regulations in relation to air pollution with regards to emissions from the chimney are to be adhered to. Continuous monitoring for the emissions from said chimney are to be in place prior starting the operations. Cumulative impacts on the area of influence from the emissions of the chimney are to be monitored and the necessary mitigation measures are to be adopted. Filters and related equipment are to be used as per manufacturer instructions and kept in good state of repair to prevent any undesirable contaminants in air and surrounding area of influence. Furthermore, the mitigation measure with regard to slug/ bottom ash and fly ash are to be adopted and regularly maintained to prevent air pollution in the area of influence. Light, Noise and Vibration pollution: All the necessary mitigation measures during the construction and operation phase of the project are to be implemented to prevent and/or reduce the level of light, noise and vibration in the surrounding area. Waste: With regards to waste generated during the construction works, the developer is to follow the waste management plan and waste handling procedures according to the Waste Management Policy. It is recommended that all proposed mitigation measures during the construction and operational phase, are to be strictly implemented by the applicant to mitigate as much as	Noted. The measures mentioned in the comments are already included in the EIA reports/tender document.

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 are to be readily available to the Competent Authorities when requested.	
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C. Energy and Water Agency (email dated [04/04/2025])

Comments	Reply
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 reference to page 75 of the Appropriate Assessment document, we encourage the applicant to elaborate further on what alternative technologies are being considered to reduce diesel consumption. For assistance we refer the applicant to our previous suggestions submitted on 09/04/2024. Water: - No comments	If available and technically suitable, biodiesel can be preferred over conventional fuels.

3. Comments received from the public (09/03/2025- 09/04/2025)

	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 Magħtab (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, Magħtab and Hal Far. The Delimara site was chosen as the most favourable with the Magħtab site ranking second. In their conclusions, Umweltbundesamt stated that “the stage of planning is very early for a final site selection of a waste-to-energy facility and several crucial parameters are not yet identified.” Therefore Magħtab was not the selected site but <u>delimara</u>	The study on alternative sites evaluated five potential locations for the development of the Thermal Treatment Facility (TTF). These include the existing TTF site in Marsa and four other sites within the ECOHIVE complex. The results from the site assessment were presented in the Coordinated Assessment. The selected site offers the most favourable outcome in terms of protected areas, visual impact, safety, logistics, and environmental considerations. Additionally, the National Waste Plan for Malta (2021-2030) indicates that the TTF facility will be part of the ECOHIVE complex. As for hazardous waste generation forecasts, the generation of such waste is expected to increase, and the new TTF is designed to meet these future demands. The Coordinated Assessment and Air Quality Study has been conducted in compliance with the Terms of Reference provided by the Environment

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=IwY2xjawJjGsRleHRuA2FlbQlMQABHjyPrSTa8SoQolm9BFjBH0z6xBrBOEa9y8Xy2fd6rDJXYuobu6PaGsANTP6g_aem_3X225rZmK1P2o2URhe0avA#Echobox=1739386847 As well as considerations that the economic model of MALTA in malta's vision for 2050 tourism is to reduce the number of tourists: “In Tourism, the strategy is to shift towards premium offerings that prioritise quality over quantity, balancing visitor volumes with higher per capita expenditure” Reference: Malta-Vision-2050-Public-Consultation.pdf https://economy.gov.mt/wp-content/uploads/2025/04/Malta-Vision-2050-Public-Consultation.pdf Therefore: assumption that The MARSAsite is too small for MALTA's needs is incorrect especially since it is suggested by the reports commissioned on WTE, that “One of the most important factors in the SLR report was that the plant was sized on the predicted 2045 waste generation volumes with waste generation continuing to increase throughout the lifetime of the project. SLR projected that a plant with a capacity to handle between 150ktpa – 200ktpa would be required.” Furthermore, traffic management at MARSAsite has been considerably improved and therefore this site , should be also re-considered in light of todays realities and data. Therefore, the solutions put forward by SLR are not robust based on the assumptions put in place in 2016 versus todays realities and 2050 vision for MALTA. Therefore, the lack of robust and valid explanations of why Delimara as well as Marsa both close to the shore line and the electricity grid, imply a lack of holistic approach to identification of a WTE site. Furthermore: comments during the public consultation for project EA/00020/22 Description of Proposal: Proposed Thermal Treatment Facility in the ECOHIVE Complex, including plant building, storage building, administration building, waste water treatment, tank farm and cisterns Location: Site at, ECOHIVE Complex, Tul il-Kosta, Naxxar.	and Resources Authority (ERA). The scenarios analysed in the study are based on these guidelines. In addition to normal and maximum operating conditions, the study also considers abnormal operating conditions (Scenario C), which are modelled using the limit values specified in Schedule 2 of S.L.549.81. .This scenario represents the most extreme operating conditions and thus adequately addresses the need to ensure compliance under all circumstances, not just during maximum operation. It is important to emphasize that these modelled limits are for the purpose of analysing potential worst-case scenarios in the event of abnormal conditions. They do not represent the expected operational limits for the facility. The facility is designed to operate within the emission limits determined through the EIA and IPPC permit process within the strictest emission standards achievable.
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	https://era.org.mt/wp-content/uploads/2024/03/PA-6096_23-Comments-received-during-TOR-consultation.pdf PA-6096_23-Comments-received-during-TOR-consultation.pdf Importantly the Environmental Health / Department for Health Regulation sent an email (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: 1. 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. 2. 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 As per EIA, an Air Quality Study for a new Thermal Treatment Facility (TTF) PA/06096/23 was carried out Reference is made to the the report on page 34 which states: “ Below are the model simulation scenarios: • Typical operations (Scenario A): 60% thermal load for 24 hours, also meaning a flue gas flow per line of 4116 Nm3/h for 24 hours; • Maximum operating conditions (Scenario B): 100% thermal load for 23 hours (flue gas flow per line of 6860 Nm3/h) and 110% load for 1 hour (a flue gasflow per line of 7814 Nm3/h); Group III Sb+As+Pb+Cr+Co+Cu+Mn+Ni+V 0.03 mg/Nm3 • Abnormal operating conditions (Scenario C): based on the limits defined in Schedule 2 of S.L.549.81, a dust concentration of 150 mg/Nm3 shall be set at the stack at maximum operating conditions. The concern I would like to raise is the report should be updated since according to S.L.549.81 a dust concentration of 150 mg/Nm3 shall be set at the stack at <u>any operating conditions</u> AND not Maximum operating conditions. Thereby, the robustness of the model is therefore questioned. Furthermore the provisions of S.L.549.81 need to complied with, and therefore scenario D is required where the plant is started up and the dust concentration monitored during the start up as temperatures would not have been reached to burn mixed waste. Furthermore it is not clear how the model handles different temperatures that might be required for incinerating hazardous waste containing halogens. Therefore, in consideration of the above aspects, a re-assessment for use of Delimara site and Marsa is required as per points raised above, as well as an updated Air Quality report with scenario D Furthermore the provisions of S.L.549.81 need to complied with, and therefore scenario D and dust concentration monitored during the start up as temperatures would not have been reached to burn mixed waste. Chronic exposure to this dust is toxic and	
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	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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