

4. Comments received following the public hearing (23rd April 2025 – 30th April 2025)

	Individual	Comment received	EIA Coordinator Response
1.	Individual 1	Dear Sir/EA Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours Group, I hereby declare that I am totally against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is useless to the extent that plants are being assessed on an individual basis. To come to anywhere close to the correct conclusion, one has to assess these plants cumulatively i.e. all together.	The EIA has considered the cumulative impact of other developments at the ECOHIVE complex in Maghtab. For example, the air quality study considered the cumulative impact of both Waste to Energy and Thermal Treatment Facility operating simultaneously. Similarly, the visual impact of the Waste to Energy, Thermal Treatment Facility, Organic Processing Plant and Materials Recovery facilities proposed at the ECOHIVE complex were also assessed and clearly explained during the public hearing and the published EIA reports. The Environmental Impact Assessment was carried out as a coordinated and comprehensive study in full compliance with EU legislation. The assessment began with a baseline assessment of the current environmental conditions and took into consideration other major projects at Maghtab, such as the Waste-to-Energy Plant, the Organic Processing Plant, and the Material Recovery Facility. It also evaluated cumulative impacts, such as combined air emissions, and was aligned with the principles of EU Directive on the assessment of the effects of certain public and private projects on the environment (Directive 2011/92/EU), which explicitly prohibits fragmented assessments. Section 2.3.3, "Other planning developments in the area" of the Coordinated Assessment refers to proposed projects under the ECOHIVE project, namely the waste-to-energy project, the organic processing plant, and the Material Recovery Facility. It also considers Enemalta's new electricity interconnector (IC2).
2.	Individual 2	Good Afternoon, Following last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), I would like to express my opposition against the proposed construction of the Thermal Treatment Facility in Maghtab. Being a resident of Naxxar, my main concern is that the impact assessment carried out considered only the effects of a single incinerator, without accounting for the cumulative impact of all projects in the area, making the assessment inadequate.	Refer to response provided to Individual 1.
3.	Individual 3	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
4.	Individual 4	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations	1. Regarding cumulative impacts kindly refer to the response provided to Individual 1. 2. Regarding assessment of alternative locations, the study considered retaining the existing site in Marsa and sites within Maghtab. Maghtab was identified as the most effective and appropriate location based on technical and environmental criteria, primarily because there are no protected sites within the area and also because it allows the new facility to form part of the existing waste

		3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I thank you for your consideration.	management infrastructure for the reasons highlighted in Malta's Long Term Waste Management Plan 2021-2030. The Maghtab site benefits from established road access, utilities, and logistical systems, enabling a more centralised and efficient waste management operation. This approach not only enhances system performance but also reduces reliance on landfilling, limits waste transport impacts, and helps lower operational costs. More details on this are available in the 'Alternative Site' section of the Environmental Impact Assessment. 3. Social impacts have been thoroughly considered through various studies conducted as part of the EIA. These include: - Air dispersion modelling, which assessed impacts on sensitive receptors such as residential areas, schools, and hospitals. - Noise impact assessment, which evaluated effects on residential properties, beach areas, and hotels. - Visual Impact Assessment, which considered impacts on residents with views of the scheme from their homes, pedestrians in nearby streets, road users, and passengers or drivers in vehicles.
5.	Individual 5	Dear Sir/Madam, Further to last week's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
6.	Individual 6	Sirs I am sending this email to register the my objection to the proposed Thermal Treatment Facility at Ecohive, Maghtab (PA/06096/23, EA/00020/22) on behalf of my family an in solidarity with at least 270 other families in the Naxxar, San Pawl tat-Targe area. The terms of reference for the Environmental Impact Assessment of the proposed Hazardous Waste Thermal Treatment (Incineration) Facility (in Maghatab) concentrate on only one of several new waste treatment facilities being proposed at Maghatab – the Thermal Treatment Facility (TTF). The separate discrete assessments of the various new schemes proposed for the concentration and development of waste treatment facilities at Mghatab, over and above the existing landfill facilities which already have major environmental impacts, is a serious flaw in the environmental impact process being adopted. The (intended or inadvertent) aim clearly is to assess in quasi isolation impacts of one scheme without considering the cumulative effects of all proposes schemes together and the 'carrying capacity' of the Maghatab area and its area of influence. Concentrating all of Malta's waste management/treatment in one area puts the surrounding population and environment in the highest risk exposure to impacts from the various waste facilities; the cumulative effects of which are not studied and unknown. The Thermal Treatment Facility alone has, according to the EIS, a 6km radius area of influence (113 square kilometers) which is more than 1/3 the area of the country including Gozo and Comino). There is no explanation of how the Area of Influence (Aol) was determined. The Aol is within large parts of the Northern, Northern Harbour and Western Regions spanning 18 local councils; several of which are the largest councils in terms of geographical area. These regions together have the higher share of the population and number of families and significantly higher population growth rates compared to other regions (i.e. South Harbour, South Eastern, Gozo and Comino) not within the area of influence (Source – NSO). The EIS states that "the nearby land uses at the existing site, which constitute several industrial, office and residential areas,	The assessment has considered cumulative impacts, please refer to the response provided to Individual 1. Regarding flue gas treatment system and continuous monitoring The TTF is explicitly designed to comply with the Industrial Emissions Directive (2010/75/EU), including all relevant Emission Limit Values (ELVs). These regulatory obligations are incorporated directly into the project's technical specifications. The facility includes BAT-Conformant Technologies: multi-stage flue gas cleaning with: sodium bicarbonate / lime injection, activated carbon injection, baghouse filters, additional layer of cleaning: wet scrubber systems, 7/24 online Continuous emissions monitoring (CEMs). The facility will operate under permit conditions issued by ERA. Continuous emissions monitoring will be carried out. Results will be reported to the Environmental Regulator. Regarding the Area of Influence (Aol) in the air quality modelling study The 6 km radius represents the Area of Influence (Aol) used in the Environmental Impact Assessment for air quality modelling. It is important to clarify that the indicated Aol does not represent the area where adverse effects are expected to occur. Rather, it defines the geographic scope of the

	frequently submit complaints with regards to odour generation at the site.” It concludes “Therefore, the relocation to the Maghtab ECOHIVE complex presents the most effective solution, both in terms of eliminating direct impact on residents, and also increasing efficiency of the waste management as a whole, ...” It concludes that “The current operations at the existing Marsa TTF are costly, pose adverse environmental and health impacts and has reached its operational capacity.” Alternative locations were not considered. Separating facilities to reduce risk in any one area was not considered. These objectives underlying the TOR and the flawed isolated environmental impact assessment procedure being adopted are fundamentally objectionable. The project is being undertaken for economic and financial cost saving reasons both for Wasteserv and also for business/commercial entities and economic operators that generate waste, particularly hazardous waste. It is logical to conclude that the proposed TTF will make it cheaper to dispose of hazardous waste. There is no mention of reduction of hazardous waste at source by having more sustainable commercial and industrial activities. There is not serious consideration of the impacts on the residents and environment. Instead the focus is on the treatment and dealing with the projected doubling of the volumes of such hazardous waste over the next 20 years. This is illogical and the opposite of the EU and global established sustainability policies of Reduce, Reuse and Recycle! The EIS clearly outlines that the project was designed with the aim of optimizing production/operational efficiency and cost effectiveness by concentrating all waste treatment and management facilities into one area (Mghatab) and in doing so shifting the impacts associated with an incineration facility, including adverse environmental and health impacts from Marsa to Mghatab. The study does not consider the cumulative effect, nor the ‘carrying capacity’ of the site nor the risks of having such a concentration of waste facilities including the hazardous waste TTF being proposed. The waste streams to be processed in the proposed scheme include: carcasses, waste oils, chemicals, medical waste, cytotoxic waste, abattoir/butcher and meat processing wastes and other forms of liquid and solid wastes. Volumes are expected to double from 5,000-6,000 tonnes of hazardous waste annually to above 10,000 tonnes by 2045. Capacity on 2 production lines is 14,000 tonnes per year but the initial investment will be in one line (in Mghatab) having a capacity similar to the existing facility (in Marsa). Lifetime of the new facility is 20 years. Resulting fly ash and slag from the incineration process will be initially exported but may in the future be re-used. “During the operational phase, rare incidents such as fuel spills or fires could further impact land use. While these risks are low, they could have serious consequences. Through an effective Emergency Response Plan as the final resort, their impact can be minimized to a minor level. “ The project will have a major adverse visual impact that will cancel efforts being made to soften the current Mghatab landfill with trees and vegetation. The EIS notes that: “P5 and VP7 will also face considerable impact, as their vantage points allow for an unobstructed view of tall machinery against the skyline, affecting a large number of observers. ...The simultaneous construction of other waste management facilities will further degrade the landscape, particularly as agricultural land near the landfill is affected, leading to a significantly adverse impact on these viewpoints. ... These combined effects will result in a notable decline in the overall landscape character.” “The landfill, covering roughly 500,000 square meters, has already altered the area's geomorphology, and additional excavation is expected to worsen its degradation. “ Air quality The consultants have identified an Area of Influence (AOI) to be a 6km radius circle around the plant’s chimney stack. This means an area of 113 square kilometers. How this AOI (ie 6km radius circle) was determined is not explained. Yet in the report, the area is miscalculated to be 11.3 square kilometers. Several calculations related to air quality risks and various particulate, heavy metal and other chemical emissions are made referencing this incorrect area. Therefore, an independent expert review of the report is required to cross and double check assumptions, data, risk assessments and calculations prior to making any further decision making on this important matter.	environmental studies conducted to ensure that all potentially affected areas are thoroughly assessed. This modelling boundary enables a thorough evaluation of air quality at both nearby and more distant locations, confirming no significant change in air quality throughout most of this area. Claims that the entire 6 km radius will be negatively impacted are completely misleading. Regarding air quality modelling results The Environmental Impact Assessment included a dedicated assessment of all sensitive receptors, including schools, households and other facilities within the AoI. The facility will use Best Available Technology (BAT) and a robust multi-barrier emissions control system to minimise environmental and health risks. Emissions from the stack will be continuously monitored using a Continuous Emissions Monitoring System (CEMS). Air dispersion modelling found no significant adverse health effects, even in worst-case scenarios. Only one sensitive receptor (R27), an agricultural plot, may experience a minor cumulative impact due to the Thermal Treatment Facility and the adjacent Waste-to-Energy Plant, which remains far below health thresholds. More importantly, all projected emissions fall well below the thresholds set by the EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC), ensuring the protection of public health. Regarding assessment of alternative site, kindly refer to the response provided to Individual 4. Regarding waste reduction at source and the sustainable management of waste, this remains a core principle, with existing policies and practices already prioritising these approaches. However, addressing the waste that is still generated remains a necessity. Most of the waste that will be treated at the Thermal Treatment Facility comprises of dead farm animals, abattoir waste (leftover meat) and clinical & industrial waste. As presented in the EIA coordinated assessment report, various treatment technologies were evaluated for different hazardous waste streams currently generated in Malta. Following this evaluation, rotary kiln incineration was identified as the technology capable of safely and effectively treating the full range of these waste streams. The incineration process is closely controlled by strict EU rules via an IPPC permit that would be issued to the facility prior to operation to make sure it operates safely and in line with EU requirements. The WasteServ waste management strategy of which the Thermal Treatment Facility (TTF) is one of key components is fully aligned with the principles of the EU waste hierarchy, which prioritizes waste prevention as the most desirable outcome. Significant efforts are being made to reduce waste generation at the source through comprehensive policy frameworks, regulatory enforcement and
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It is unclear if these include a baseline – ie the existing situation and whether emissions from all approved and projected ECOHIVE activities are also included in the figures. The assessment of the impact on air quality assumes that the incinerator complies with the daily limit values. However, it seems that the assessment was made on one theoretical incinerator and not two once the second comes on line. Both incinerators working concurrently should have been studied. No assessment of odour was made. Odour is the major complaint of the existing facility, yet no assessment of the impact from odour at the ECOHive site was made. This is another flaw in the environmental assessment made. Geology, geomorphology, hydrogeology and soil The report states that “All the substances listed above, which are released during the collection, storage and incineration of waste in a TTF, pose a major impact on soil and water environmental matrices. All these hazards require careful monitoring and management to mitigate their environmental impact.” Proposed Mitigation The report provides generic and vague recommendations for mitigation and control measures instead of tangible and transparent mitigation. It lacks specific measures such as: - Permanent air quality monitoring stations at all reception sites mentioned in the report, with live streaming on the internet available to the public and alarm triggers at set levels below the acceptable thresholds for the various parameters. - Specification certification and control check on all vehicles transporting waste for incineration, including transportation of carcasses and dead animals. These should be sealed and refrigerated. - All waste transport vehicles and operators should be licensed and only licensed operators are to be used. - Waste transport vehicles approaching the facility should be GPS tracked and operate on specific approved routes only which should avoid residential neighbourhoods and roads. In conclusion the EIA did not convince me that the proposed TTF and the concentration of waste treatment at ECOHive in Maghreb will not deteriorate the environmental risks to the locality we live in and to my family’s well-being and health. Therefore I object to this project.	public awareness initiatives. WasteServ actively supports these efforts through various initiatives, such as the Malta Waste Reduction Awards and educational programs offered at the EcoHive Academy in Marsaskala. At the same time, substantial investments are underway to strengthen recycling infrastructure and improve material recovery rates, supporting Malta’s shift toward a circular economy. These include: ○ A new Materials Recovery Facility to increase recycling rates and support Malta's compliance with EU recycling targets. ○ A new Organic Processing Plant to convert organic waste into energy and compost, directly supporting circular economy goals. ○ A new Skip Management Facility to process bulky mixed waste from skips and recover recyclable materials that would otherwise be landfilled. Despite these robust waste prevention and recycling measures, a residual waste stream inevitably remains, consisting of both non-hazardous and hazardous non-recyclable waste. • For non-recyclable, non-hazardous residual waste, the Waste-to-Energy (WtE) facility plays a crucial role by diverting it from landfills, recovering energy and valuable materials such as metals. This approach is fully consistent with the EU Waste Framework Directive, which identifies landfilling as the least preferred option. The justification for this waste-to-energy facility was comprehensively evaluated in the EIA submitted prior to the granting of development consent. • Regarding the subject of this EIA, the proposed Thermal Treatment Facility (TTF), certain waste types, such as clinical, abattoir, pharmaceutical and specific industrial wastes, cannot be recycled due to sanitary, technical and legal constraints. As demonstrated in the EIA-coordinated assessment report, various treatment technologies were evaluated for the hazardous waste streams currently generated in Malta. Following a thorough assessment, rotary kiln incineration was identified as the technology capable of safely and effectively treating this broad range of wastes. For these unavoidable and non-recyclable wastes, the TTF provides a safe, controlled, and legally compliant disposal method, ensuring the protection of human health and the environment. The facility incorporates advanced emissions control technologies in compliance with Best Available Technology (BAT) and the Industrial Emissions Directive (2010/75/EU). Importantly, TTF does not reflect a diminished commitment to sustainable waste management. On the contrary, this facility is designed to responsibly manage the unavoidable and unrecyclable waste stream and are fully
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			supportive of the upper tiers of the waste hierarchy. Key environmental benefits include: ○ Replacing an outdated facility with one that incorporates Best Available Technology (BAT), including advanced filtration systems and real-time emission monitoring. ○ Treating unavoidable hazardous waste locally, reducing reliance on waste exports and associated emissions. ○ Complying with the EU Waste Hierarchy by managing waste that cannot be reduced, reused, or recycled. ○ Supporting Malta’s Long Term Waste Management Plan 2021-2030, (2021–2030) ○ Achieving emission levels well below EU thresholds, as verified by the independent Environmental Impact Assessment Regarding the Air Quality Scenarios, the scenarios are clearly explained in the Introduction Chapter of the Air Quality Study. These consider scenarios with different throughputs of waste and also an abnormal scenario. Kindly refer to the Air Quality Study (Standalone technical study) which provides a detailed overview of the baseline studies conducted and the empirical and scientific models which have been used to predict the air quality impacts for each scenario. The proposed TTF will operate within the limit values stipulated by EU Directives. Monitoring of emissions is also suggested in the EIA reports provided. These will be in line with IPPC permit requirements. In the event of system breakdowns, malfunctions or exceedances of emission limit values, the plant would initiate a shutdown procedure. Such events are investigated and reported to the ERA. Possible odours from waste will be controlled thanks to various odour abatement systems, which include storing waste in enclosed refrigerated areas, negative pressure systems inside buildings, air curtains and other systems of ventilation control. Odour emissions are also regulated through the IPPC permitting process and monitored throughout the operational lifetime of such facilities. All EIA reports submitted by the EIA coordinator are reviewed by the ERA which regulates the EIA procedure.
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7.	Individual 7	Project reference: Proposed thermal treatment facility (TTF) at ECOHIVE, Maghtab PA no: PA/06096/23 EA/00020/22 Please note my objection to the above mentioned project.	
8.	Individual 8	Project reference: Proposed thermal treatment facility (TTF) at ECOHIVE, Maghtab PA no: PA/06096/23 EA/00020/22 Please note my objection to the above mentioned project.	
9.	Individual 9	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

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

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

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

20.	Individual 20	TO WHOM IT MAY CONCERN Please note that the undersigned, Joseph Borg and Lucienne Borg, residing at 4, iz-Zenqa, Triq Nicholas Monsarrat, Naxxar NXR2371, Malta, DO NOT AGREE with the proposed incinerators project at Mghatab. Our disagreement, apart from serious health concerns, is based on the fact that a cumulative assessment of all plants together was not carried out.	Refer to response provided to Individual 1.
21.	Individual 21	Mistoqsijiet dwar salvagwardji għas-saħħa tar-residenti u konformita' mal-Liġi Ewropea fil-proġett ta' Incineratur fi Triq il-Kosta Naxxar Wara l-komunikazzjoni min naħa tal-ERA inkluż il-laqgħa pubblika tat-23 April id-domandi u l-inkwiet tar-residenti tan-Naxxar, San Pawl il-Baħar, Ghargur, Mosta, Madliena, H'Attard, San Ġiljan, Lija, Balzan, Iklin, Birkirkara, Msida, Swieqi, Pembroke, Gżira, Sliema, Rabat, Mgarr u bosta bliet u rħula oħra fil-viċin fuq l-impatt tas-saħħa għar-residenti mill-proġett tal-incineratur żdiedu flok naqsu. Bħala resident ta' waħda minn dawn il-lokalitajiet kif ukoll bħala rappreżentant tal-Maltin fil-Parlament Ewropew qed inressaq dawn id-domandi fuq aspett ta' applikazzjoni ta' policies Ewropej lill-awtoritajiet kollha kompetenti b'mod partikolari l-ERA u l-Planning Authority li nitlob li jiġu mwiegħba għall-benefiċċju tal-pubbliku skont il-Konvenzjoni ta' Aarhus* dwar l-Infurmazzjoni Ambjentali. Fid-dokumentazzjoni mressqa sa issa fejn jiġi kkunsidrat l-impatt ambjentali tal-proġett ma tressqitx infurmazzjoni dettaljata biżżejjed dwar l-impatt fuq is-saħħa tar-residenti. Niġbed l-attenzjoni li dan l-impatt mistenni fuq ir-residenti huwa kriterju fundamentali fil-kuntest tad-Direttiva Ewropea KE 2000/76 dwar l-incinerazzjoni tal-iskart u l-iġijiet Ewropej oħra applikabbli għal dan il-proġett. Nitlob li titressaq infurmazzjoni dettaljata dwar l-impatt fuq is-saħħa tar-residenti mill-proġett li skont l-istess ERA ser jipproduċi 'particulate matter' li jista' jinfirx f'radius ta' sitt kilometri. B'mod partikolari, insaqsi jekk l-ERA għamlitx jew jekk hix beħsieba tagħmel studju tal-impatt fuq is-saħħa tar-residenti mill-emissjonijiet ta' 'particulate matter' msejja nano-particles li skont id-dokumentazzjoni Ewropea huwa partikularment diffiċli biex jiġu limitati permezz ta' filtri u miżuri oħra ta' tnaqqis tal-emissjonijiet. Id-Direttiva KE 2000/76 tobbliga wkoll lill-awtoritajiet kompetenti minn proġetti ta' incineraturi li jwaqqfu sistemi ta' monitoraġġ tal-kwalita tal-arja u sampling regolari fiż-żoni kollha konċernati (li skont l-ERA jilħqu madwar terz ta' Malta f'radius ta' 6 kilometri). Ma joħroġx ċar sa issa mid-dokumentazzjoni mressqa liema miżuri ser jiġu mwaqqfa biex dan jiġi assigurat. Din id-domanda ssir aktar pertinenti meta tqis li fil-każ tal-emissjonijiet ta' impjant differenti li jipproduċi Tarmac, l-ERA ddikjarat li m'għandiex il-meżzi biex tassigura l-monitoraġġ u s-sampling regolari u sistematiku tal-kwalita tal-arja. X'miżuri qed jipplanaw l-awtoritajiet kompetenti li jserrfu ras ir-residenti li sa issa żgur mhix mistrieħa anke fuq proġett ta' dimensjoni ħafna u ħafna iżgħar minn dak tal-incineratur? Domanda oħra marbuta mas-sampling u monitoraġġ regolari tal-kwalita' tal-arja hija jekk l-awtoritajiet kompetenti daħħlux jew hux ser idaħħlu mekkaniżmu ċar li jissospendi immedjatament l-operat tal-incineratur u l-applikazzjoni ta' penali effettivi hekk kif dan jidher li qed jipproduċi emissjonijiet li jmorru lil hinn mil-limiti stabbiliti mil-liġi Ewropea. Id-dokumentazzjoni mressqa kif ukoll il-legislazzjoni Ewropea tindika biċ-ċar li hemm relazzjoni diretta bejn l-ipproċessar tal-volumi adattati minn incineratur u l-livell u l-karattru perikoluż jew le tal-emissjonijiet li jipproduċi incineratur. Bħala eżempju, jekk incineratur jipproċessa l-ammont eżatt ta' skart li jkun iddisinjat biex jipproċessa b'mod regolari dan jipproduċi anqas emissjonijiet però jekk jintuża biex jipproċessa load akbar jibda jipproduċi ħafna aktar emissjonijiet u 'particulate matter' li jagħmel ħsara lis-saħħa tal-bniedem. Fil-preżent qed naraw sitwazzjoni, li għalkemm f'kuntest differenti, fiha dinamika simili ħafna għal din imsemmija. Fit-trattament tad-drenaġġ ukoll giet imfassla sistema b'investiment ta' 70 miljun euro mill-Unjoni Ewropea li fil-prinċipju kellha tipproduċi ilma ta' kwalità tajba mid-drenaġġ u titfa fil-baħar biss ilma nadif. Dan iżda mhux qed isir bħal ma jaf kulhadd. Minflok, l-impjanti tad-drenaġġ f' Tač-Ċumnija fil-Mellieħa, f'Ta'Barkat f'Haž-Žabbar u f'Ras il-Ħobž f'Għajnsielem Għawdex qed jiġu kontinwament mgħobbija ħafna aktar milli kapaċi jitrattaw drenaġġ bir-riżultat li dawn qed jirrilaxxaw kontinwament id-drenaġġ mhux trattat, jew mhux trattat biżżejjed fil-baħar sabiħ ta' madwarna. Meta wieħed iqis it-track record tal-awtoritajiet kompetenti fil-qasam tad-drenaġġ, kif jistgħu dawn iserrfu ras ir-residenti taż-żoni msemmija li l-operat tal-incineratur ser isir b'mod li ma jinqabżux il-limiti stretti stabbiliti b'mod li jiżdied addirittura aktar l-impatt fuq ir-residenti?	Il-mudelli tal-kwalita' tal-arja kkunsidraw l-impatt mill-operat tal-proġett tat-Thermal Treatment Facility flimkien mal-proġett tal-Waste to Energy. Dawn il-mudelli bassru kif il-'particulate matter' minn dawn l-impjanti se jkun qed jinfirxu fl-Area of Influence ta' 6km mič-ċumnija, billi ġew analizzatti mal-55 riċettur uman u ambjentali imferxin f'din il-meddha. L-istudju jikkonkludi li ž-żieda kumulattiva tal-'particulate matter' fuq dawn ir-riċetturi kollha, huwa wieħed negligibbli għajr għal impatt minuri f'riċettur numru 27 li jnsab fil-Magħtab. Dan jikkonferma li l-istudju ressaq l-informazzjoni neċessarja dwar l-impatti mill-'particulate matter'. L-istudju annalizza wkoll inkwinanti oħrajn bħad-dioxins, metalli u parametri oħra li wkoll huma mbassra li ma jačċeddux limiti stretti internazzjonali dwar il-kwalita' tal-arja u s-saħħa tal-bniedem. Għal iktar infurmazzjoni irreferi għall-istudju tekniku (separat) dwar il-Kwalita' tal-Arja. Dwar sistemi ta' monitoraġġ tal-kwalita' tal-arja u sampling, l-operatur huwa obbligat li jimxi mal-kondizzjonijiet tal-IPPC permit li jinħareġ mill-ERA qabel mal-facilita' tkun tista tibda jopera. Dan il-permess tal-IPPC, li wkoll huwa suġġett għall-konsultazzjonijiet pubbliċi qabel ma jingħata, jinkludi fih diversi kundizzjonijiet dwar l-operat, monitoraġġ tal-emissjonijiet ambjentali u kontroll tal-impatti fuq is-soċjeta li l-operatur għandu obbligu li jħares. Dan il-permess tal-IPPC huwa imfassal fuq ir-rekwiżiti ambjentali u standards stipulati minn Direttivi Ewropej dwar l-incinerazzjoni tal-iskart. Pereżempju, hija prattikka komuni li l-emissjonijiet mill-impjant jiġu mmonitorjati b'mod kontinwu b'sistema li għandha is-setgħa li twaqqaf l-operat tal-incineratur f'każijiet ečċezzjonali fejn l-emissjonijiet ječċeddu l-limiti stabbiliti. L-operatur għandu l-obbligu li jżomm dawn is-sistemi ta' monitoraġġ u kontroll f'kundizzjoni tajba. Mhux permessibli li l-incineratur jopera f'każ li din is-sistema ma tkunx qed tiffunzjona kif meħtieġ. Dwar il-mistoqsija tal-ipproċessar tal-volumi, l-istudju evalwa il-possibilita' li l-impjant jopera b'load normali ta' 60% (xenarju tipiku) kif ukoll b'loads għola li jilħqu l-100% għall 23 -il siegħa u 110% għal siegħa waħda f'gurnata. L-emissjonijiet f'dawn ix-xenarji differenti ġew studjati fid-dettal anke saħansitra billi ġew inklużi l-emissjonijiet kumulattivi mill-operat tal-Waste to Energy facility. Ir-riżultat mill-mudelli li saru jindikaw li ž-żieda fil-particulate matter hija waħda t'impatt negligibbli. Inhegġuk taqra ir-rapport tekniku dwar il-kwalita' tal-arja għall-iktar infurmazzjoni dwar il-livelli previsti.

		B'rabta mar-riskji ta' overload, fid-dokumentazzjoni mressqa u fil-laqgħa li saret għar-residenti għadu mhux ċar kif l-awtoritajiet ser jimmonitorjaw u jieħdu sampling regolari tal-emissjonijiet tad-dijossina. Id-dijossina fl-arja tista' tkun partikolarment ta' ħsara għar-residenti esposti għall-effett tal-inċineratur u r-riskju ta' emissjoni akbar ta dijossina jiżdied jekk ikun hemm load akbar u jkun hemm dak li jgħidulu 'incomplete pyrolysis' minħabba li l-inċineratur ikun mgħobbi ħafna u allura jibda jipproduċi emissjonijiet akbar minn dawk previsit fil-kriterji tekniċi tiegħu. Nistaqsi kif l-awtoritajiet kompetenti qed jippjanaw li jipprevjenu, jimmaniġġjaw u jevitaw dan ir-riskju hawn imsemmi. Nirringrazzjakom tal-attenzjoni u f'isem ir-residenti nistenna risposti dettaljati bil-miktub skont kif l-awtoritajiet konċernati huma obbligati fil-Konvenzjoni ta' Aarhus u l-liġijiet li jimplimentawa fil-livell Ewropew u nazzjonali. Il-Konvenzjoni Aarhus tiggarantixxi d-dritt ta' kull Ewropew u allura kull Malti li jgħix f'ambjent tajjeb għal saħħtu. Dan billi tagħti dritt dirett liċ-ċittadini li jitlob l-informazzjoni shiħa dwar kull deċiżjoni li jista' jkollha impatt fuq saħħtu. Il-Konvenzjoni tiggarantixxi wkoll id-dritt tal-partecipazzjoni pubblika fid-deċiżjonijiet kif ukoll tal-aċċess għall-ġustizzja fuq kull deċiżjoni li taffetwa saħħitna f'Malta. Il-Konvenzjoni giet iffirmata mill-Gvern Malti fl-1998 u daħlet ukoll bħala liġi tal-Unjoni Ewropea permezz ta 4 direttivi differenti fl-2003.	
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22.	Individual 22	30/04/2025 Subject: PA/06096/23 (EA/00020/22) Thermal Treatment Facility Objection to the Proposed Hazardous Waste Incinerator in Magħtab To: The Hon. Minister for the Environment, Energy and Regeneration of the Grand Harbour The Environment and Resources Authority (ERA) Malta Dear Minister, ERA Officials and PA officials, I am writing to express my strong opposition to the proposed hazardous waste incinerator and Thermal Treatment Facility in Magħtab as per application PA/06096/23 (EA/00020/22). This area is already heavily burdened with waste infrastructure and lies in close proximity to homes, schools, and productive agricultural land. The health, environmental, and economic consequences of this project are simply too severe to ignore. Incinerators emit dangerous pollutants — including dioxins, furans, PCBs, and heavy metals — all of which are linked to cancer, respiratory illnesses, neurological damage, and hormonal disruption. These toxins will be in the air we breathe, settle on soil, contaminate groundwater, and accumulate in crops and livestock, entering the food chain through bioaccumulation and biomagnification. The result is long-term exposure for residents living in such close proximity and irreversible harm to the environment. Furthermore, placing such a facility near residential communities violates basic public health principles and puts local agriculture at risk. Contaminated produce could become unsafe and unsellable, severely impacting farmers’ livelihoods and Malta’s food security. We urge the authorities to reconsider the proposed location and instead explore alternative sites well away from populated and agricultural areas. Ideally, the government should pursue safer, non-incineration waste management solutions that do not compromise public health or environmental sustainability. This decision will have lasting consequences. We ask that you apply the precautionary principle and uphold your duty to protect both people and the environment.	The pollutants that have been mentioned (dioxins, furans, PCBs and heavy metals) have been studied, modelled and assessed in the EIA studies. The studies predict that all existing EU limits for such pollutants will not be exceeded. The settling and deposition of such pollutants in the soil have also been predicted and compared to exiting EU limits. The results obtained are all below the established EU thresholds. Regarding assessment of alternative sites, refer to response provided to Individual 4.
23.	Individual 23 Swieqi Local Council	Att: EIA Team Further to the subject above, please find attached the Swieqi Local Council’s submission for your kind attention. We would appreciate it if you could kindly confirm receipt of this email and the attached documentation. Should you require any further information or clarification, please do not hesitate to get in touch. Dear Sir, REF: PA 06096/23 - ERA EA/00020/22 “Proposed Thermal Treatment Facility in the ECHIVE Complex including plant building, storage building, administration building, waste water treatment, tank farm and cisterns”	Below please find our replies to your questions: 1. Kindly refer to response provided to Individual 6 2. Kindly refer to response provided to Individual 1 3. For any development within the ECOHIVE Complex, safety is, and will always remain, a top priority in both the design and operation of the plants. This commitment is embedded in the technical specifications of new TTF and other developments, which require inherently safe design principles to eliminate hazards from the outset. Prevention is ensured through multiple layers of protection such as advanced process control systems, automated emergency shutdown (ESD) systems and safety instrumented functions (SIFs). Critical safety functions are deliberately assigned high Safety Integrity Levels (SILs), reflecting a clear decision that safety is prioritized. In addition to preventive measures, mitigation measures are also clearly defined as essential requirements such as fire detection and suppression systems, as well as chemical bundings. This risk-based and prevention-first approach ensures that risks are

		The Swieqi Local Council, having considered the information as so far available in connection with the above ECOHIVE Project, is hereby registering its Objection to the project on the following grounds. 1. As the map forming part of the Coordinated Assessment presented by AIS Environment indicates an area of influence of 113 square kilometres, which include most of the area within the boundaries of the Swieqi Locality, this raises our concern even more about the possibility of risk to the health of our residents. 2. We are very concerned that the project is being presented in a piecemeal manner, that is one incinerator at a time, rather than as a whole collective project. This, in our opinion, renders the individual study presented as futile! 3. The location of the Project close to Swieqi and the lumping together of all these plants and incinerators in close proximity, makes the project, with historical higher risk of fire and incidents, unacceptable to us. 4. It is a known fact that the prevailing winds in Malta are from North-West and North direction and therefore it is clear that any pollutants (including particulates, dust and other toxic emissions) would be driven to one of the most densely populated areas of Malta — potentially at a great health risk to our residents. 5. A significant component of EchoHive is the ‘waste-to-energy’ facility, which is not a carbon-neutral solution as the incineration process releases greenhouse gases which negatively affect the environment. 6. While the applicant has the financial backing to contract its experts to prepare studies and reports, which are then used to justify the project and nullify objections, we, as Councils and even as citizens have the right to engage independent expert advice on the whole EcoHive project, to ensure our citizens’ health is safeguarded. In this light, financial assistance should be available to finance independent expert advice on the consequences which the Project could have on the health and quality of life of the residents within, though not only, the 6km radius indicated in the document. The Swieqi Local Council therefore appeals to the Authorities involved (PA and ERA) to heed our concerns, which are highlighted above and others which we may raise in the discussion.	thoroughly controlled with the technical measures are implemented in line with international standards and regulations. 4. The assessment used wind data from 2021 and identified two predominant wind directions: Northwest to Southeast, and West-Southwest to East-Northeast. Additionally, the assessment considered the wind vector, the direction in which the wind blows, rather than the direction from which it originates, to more effectively account for pollutant dispersion. The study assessed the impact in an area of 113km² from the chimney and confirmed that the pollutants generated from the incineration process will not exceed the established legal and EU thresholds for air quality. 5. The justifications for the waste-to-energy project have already been assessed in the EIA presented for that project, prior to the granting of its development consent. The waste-to-energy project seeks to divert non-recyclable waste from landfilling, thus reducing landfilling pressures whilst simultaneously producing energy from the incineration process. In the absence of such a project, all non-recyclable waste generated in Malta would end up being landfilled. Please note that efforts continue to focus on waste reduction and recycling. Accordingly, new facilities such as a new organic processing plant, a new material recovery facility and a skip management facility are at various stages of development. However, despite these efforts, a residual waste stream remainsthat cannot be recycled. In line with the EU Waste Framework Directive, waste-to-energy represents a sustainable alternative to landfilling for managing this non-recyclable waste by generating energy from waste and recovering metals that would otherwise be sent to landfill. The justification for this waste-to-energy facility was comprehensively evaluated in the Environmental Impact Assessment (EIA) submitted prior to the granting of development consent. 6. The EIA coordinator would like to clarify that the EIA reports have been compiled by independent and qualified experts that are reviewed and evaluated by the ERA, the EIA regulator. The EIA reports have assessed in detail the the air quality impacts of the proposed project.
24.	Individual 24	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER. In a nutshell: 1. I think the project is a greenwash approach 2. One needs to carry a holistic analysis of all the incenerator approved, being approved and ought to be submitted for approval	Kindly refer to response provided to Individual 1 and Individual 6. Already approved Waste-to-Energy facility, and the Thermal Treatment Facility have been evaluated in this EIA. Regarding concerns on air quality impacts, kindly refer to response provided to Individual 6.

		3. If one is requesting 4 of 5 incinerators, i would try to distribute them around the island i.e. one in the north of Malta, one in the south of Malta, one in the west of Malta, one in the east of Malta and on in Gozo to. 4. In doing so, everyone carries the burden of the matter 5. Also, if there is medical waste and bio waste, why not consider discarding such bio waste with the approved crematorium 6. Furthermore, the prevailing wind is NE	
25.	Individual 25	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people’s homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents’ quality of life and property values, as well as on Malta’s reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	The air quality impacts of the proposed incinerator have been studied not only at the nearby homes, but within a 113km² area around the chimney stack. The results obtained from the models have clearly shown that the EU threshold limits on air quality will not be exceeded at any location within the 113km² area. The TTF is being proposed to treat certain waste streams generated in Malta that cannot be reused, recycled or recovered. Other facilities have been planned and put forward by Wasteserv Malta to better manage waste recycling and reduction. These include the Materials Recovery Facility (MRF) and the Organic Processing Plant (OPP) that shall be handling waste from the grey/green bags, i-bins, civiv amenity sites, organic bags etc. Regarding sustainable wasta management, kindly refer to response provided to Individual 6.
26.	Individual 26	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.

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

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

	infrastructure ([European Commission, 2020](https://ec.europa.eu/environment/strategy/circular-economy-action-plan_en)). The **EU Taxonomy for Sustainable Finance** also excludes incinerators from green investments unless they meet near-unattainable efficiency standards ([EU Taxonomy Regulation, 2020](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/eu-taxonomy-sustainable-activities_en)). Malta risks falling behind by ignoring these guidelines. 2. Deadly Health Impacts Incineration emits PM2.5, dioxins, and heavy metals—linked to cancer, asthma, and heart disease. The European Environment Agency warns that these pollutants disproportionately harm vulnerable communities ([EEA, 2019](https://www.eea.europa.eu/publications/waste-to-energy-in-europe)). With Malta’s northwest winds, toxic emissions would spread over a 113 square kilometer area of influence in a 6KM radius circle around the plant, that will eventually affect 18 Local Councils thereby worsening public health crises. 3. EcoHive: Greenwashing a Toxic Project Branding this incinerator as "EcoHive" is a deceptive attempt to disguise its harms. Mitigation measures should enforce: Strict waste reduction policies (e.g., penalties for excessive packaging). Universal recycling/composting (Malta’s rates remain alarmingly low). Anaerobic digestion (a proven, cleaner alternative). 4. Malta’s Future: Follow EU Leadership The EU is phasing out incinerator support; Malta must do the same. I demand transparency on: - Why this project contradicts EU funding priorities. - Full health/environmental impact assessments. - Plans to achieve **zero waste**—not false "burn-and-pollute" solutions.	The WasteServ waste management strategy of which the Thermal Treatment Facility (TTF) is one of key components is fully aligned with the principles of the EU waste hierarchy, which prioritizes waste prevention as the most desirable outcome. Significant efforts are being made to reduce waste generation at the source through comprehensive policy frameworks, regulatory enforcement, and public awareness initiatives. WasteServ actively supports these efforts through various initiatives, such as the Malta Waste Reduction Awards and educational programs offered at the EcoHive Academy in Marsaskala. At the same time, substantial investments are underway to strengthen recycling infrastructure and improve material recovery rates, supporting Malta’s shift toward a circular economy. These include: • A new Materials Recovery Facility to increase recycling rates and support Malta's compliance with EU recycling targets. • A new Organic Processing Plant to convert organic waste into energy and compost, directly supporting circular economy goals. • A new Skip Management Facility to process bulky mixed waste from skips and recover recyclable materials that would otherwise be landfilled. Despite these robust waste prevention and recycling measures, a residual waste stream inevitably remains, consisting of both non-hazardous and hazardous non-recyclable waste. • For non-recyclable, non-hazardous residual waste, the Waste-to-Energy (WtE) facility plays a crucial role by diverting waste from landfills, recovering energy in the form of electricity, and enabling the recovery of energy and valuable materials such as metals. This approach is fully consistent with the EU Waste Framework Directive, which identifies landfilling as the least preferred option. The justification for this waste-to-energy facility was comprehensively evaluated in the Environmental Impact Assessment (EIA) submitted prior to the granting of development consent. • Regarding the subject of this EIA, the proposed Thermal Treatment Facility (TTF), certain waste types, such as clinical, abattoir, pharmaceutical and specific industrial wastes, cannot be recycled due to their hazardous characteristics or due to sanitary, technical, and legal constraints. As demonstrated in the EIA-coordinated assessment report, various treatment technologies were evaluated for the hazardous waste streams currently generated in Malta. Following a thorough assessment, rotary kiln incineration was identified as the technology capable of safely and effectively treating this broad range of hazardous wastes. For these unavoidable and non-recyclable wastes, the TTF provides a safe, controlled, and legally compliant disposal method, ensuring the protection of human health and the environment. The facility incorporates advanced emissions
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			control technologies in compliance with Best Available Technology (BAT) and the Industrial Emissions Directive (2010/75/EU). Importantly, TTF does not reflect a diminished commitment to sustainable waste management. On the contrary, this facility is designed to responsibly manage the unavoidable, unrecyclable and hazardous waste stream and are fully supportive of the upper tiers of the waste hierarchy. Additionally: - 1069/2009 Animal By-Products Regulation - o Regulation Article 12,13,14 allows for the incineration of Category 1, 2, and 3 materials. - 2010/75/EU – Industrial Emissions Directive - o The TTF is designed to comply with Emission limit values (ELVs) and Best Available Techniques (BAT) requirements under the relevant BAT Reference Documents (BREFs). It is important to note that the EU continues to view waste incineration as a necessary final option within the waste hierarchy. This approach is reflected in the adoption of more stringent environmental standards for new waste incineration facilities across Europe. The new TTIF has been designed to align with these BAT requirements. 2. Kindly refer to the response provided to Individual 6 regarding air quality health concerns and the area of influence of the study. 3. Announced in 2020, the ECOHIVE Project represents the largest investment ever made in Malta's waste management sector. It marks a transformative step forward, not only in waste management but also in enhancing the country's overall environmental performance and achieving its waste management targets. With an investment of €500 million, the project is enabling Malta to shift from a longstanding dependence on landfilling towards a circular economy, where waste is viewed as a resource. The results will be measurable, visible, and essential for Malta's future. For a comprehensive overview of ECOHIVE's scope and sustainability strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations. 4. The EU still supports waste incineration as a last resort option in the waste hierarchy. Kindly refer to the publication of stricter EU environmental standards for the waste incineration sector. These standards set the conditions for new incineration installations across Europe.
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			https://commission.europa.eu/news/publication-new-eu-environmental-standards-waste-incineration-sector-2019-12-18_en
32.	Individual 32	Dear Sir/EA Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours Group, I hereby declare that I am totally against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is useless to the extent that plants are being assessed on an individual basis. To come to anywhere close to the correct conclusion, one has to assess these plants cumulatively i.e. all together.	Refer to response provided to Individual 1.
33.	Individual 33 Għargħur Local Council	Good morning, I hope this message finds you well. Please find attached the Għargħur Local Council’s formal objection to the proposed project referenced above, as detailed in the accompanying document. We trust that the Council’s concerns will be given due consideration. Ref. No.: PA 06096/23 Project Title: 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 Representation by Kunsill Lokali Hal Għargħur We write for and on behalf of the Għargħur Local Council and would like to register its objection to the above-captioned application submitted by the applicant Wasterv Malta Ltd with regard to the site at ECOHIVE Complex, Tul il-Kosta, Naxxar. The Local Council is filing this present representation to object to the proposed development in the course of the public consultation organised by the Environment and Resources Authority (ERA), on the following grounds: 1. Exposure of Health and Environmental Risks to Għargħur, its residents and surrounding areas The Għargħur Local Council is hereby submitting that the proposed development is associated with serious health issues and exposure, due to pollutants which are emitted in the use which is being proposed. In light of the close proximity of the site to the Għargħur, the Local Council feels that such a development may cause serious health risks to its residents. These potential risks to public health remain a serious and significant concern to the Local Council. The Local Council further submits that the size of such proposed development will obviously bring about negative environmental issues, which will affect the locality of Għargħur. Such environmental issues include air quality, health risks and exposure to air toxins, visual and aesthetic concerns, as well potential marine environmental impact due to the discharge of warm water into the sea. 2. Air Quality will be negatively impacted in the immediate surrounding areas, including Għargħur	Kindly find our replies below: 1. Kindly refer to response provided to Individual 6 2. Kindly refer to response provided to Individual 6 3. Kindly refer to response provided to Individual 4 regarding site selection. The EIA reports were published by the ERA on their website, newspapers, and the Government public consultation page. Consultations with government entities, environmental NGOs together with the Local Council and the Local Council Association were also organised. and made available to all citizens and local councils. This was carried out in line with the provisions of the EIA regulations. Link(s): https://era.org.mt/era-project/pa-06096-23/ and https://www.gov.mt/en/publicconsultation/Pages/2025/NL-0004-2025.aspx 4. The deposition of harmful pollutants from the incineration processes on agricultural land and soil have been modelled and presented in the EIA reports. Kindly refer to the findings in the air quality study. No significant adverse impacts have been predicted.

		The Gharghur Local Council hereby submits that the proposed development will bring about emissions from the proposed hazardous waste incinerator will have a negligible impact on air quality in Gharghur and the surrounding areas of the proposed site. The Local Council submits that the locality of Gharghur is immediately adjacent to the proposed site, and such emissions would immediately expose and negatively affect the residents. Furthermore, due to the enormous size of the proposed development, approximately 18,200 sq.m., the probability of such emissions to impact Gharghur are notably higher. Importantly, reference is made to the fact that from the publicly available documents, it appears that no authority has commissioned and conducted a test or study to assess the potential impact of the proposed development on Hal Gharghur. This fact alone is a solid ground for the Local Council to object, as its interests and potential risks have not been factored in by the responsible authorities. The Local Council questions as to why studies were conducted in surrounding locations, Gharghur was omitted from the air quality monitoring exercise. 3. Insufficient Public Consultation with Hal Gharghur Local Council The Local Council hereby submits that it expresses its concern, as well as the concerns of the residents it represents, about inadequate communication and involvement in the decision-making process. The Local Council feels aggrieved at the fact that no effective consultation was made with it by the responsible authorities, when such consultation is essential to ensure that the community voices are heard - especially when such a long-term project can potentially have health and environmental risks. The Local Council submits that the location of the proposed site is a concern to it. The Local Council feels that the site selection proceeds may not have adequately considered alternative locations or fully assessed the suitability of the site, especially given that part of the site lies outside the designated waste management area. 4. Impact on Agricultural Lands and Local Livelihoods The Local Council further submits that due to the emissions which are brought about from such proposed development, these will negatively impact the agricultural fields in the surrounding areas. The Local Council expresses its concerns that such fields, and its produce, may be negatively impacted from such emissions. The Local Council hereby states that the size of the proposed development alone will disrupt the environmental surroundings of the agricultural lands. In conclusion, and light of the above given concerns, the Local Council owes a duty of care to its residents and objects to the proposed development. After careful consideration, the Local Council submits the above and advocates for a comprehensive review of the proposed project, ensuring that environmental, health and community impacts are thoroughly assessed and that alternative waste management strategies are considered. We trust that the Local Council's objections will be considered.	
34.	Individual 34	Dear sirs, We would like to register our disagreement re the Incinerators Project at Maghtab on the basis that a CUMULATIVE ASSESSMENT of ALL the plants has not been carried out. If this project goes ahead , it will undoubtedly seriously impact the Quality of our Environment and consequently , also the Quality of our Health and Lives . We sincerely hope that such Vital factors are taken into consideration.	Refer to response provided to Individual 1.
35.	Individual 35	Good morning,	Refer to response provided to Individual 1.

		Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours Group, I am totally against the construction of the proposed Thermal Treatment Facility and any other waste incineration plants at Maghtab. The main reason for my objection is that the impact assessment carried out has been done in a futile manner, to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants in their entirety. Only then will the assessment be fair to the environment and all. I trust you appreciate our predicament.	
36.	Individual 36	To whom it may concern, I am a resident of Gharghur (Triq Fra Duminku Mifsud). I object to this project due to the impact it will have on the health of residents in the area, including Gharghur. I am not satisfied with the assessment that has been carried out. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. I am particularly concerned about the concentration of such sites, and thus their emissions, so close to localities where people reside which will surely increase the risk of exposure and thus impact on their health and wellbeing. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.

37.	Individual 37	To whom it may concern, I am writing to formally object to the planning application PA/06096/23 (EA/0020/22), which proposes the construction and operation of an incinerator at Maghtab. I am a local resident and therefore have serious concerns about the significant and long-lasting impact this development would have on our community. My main points for objection are: 1. Public Health Risks 2. Environmental Impact 3. Waste Hierarchy & Sustainability. 4. Traffic and Safety Concerns 5. Visual and Amenity Impact I urge the planning authority to reject this application in the interest of public health, environmental protection, and community well-being. Thank you for considering my objection.	1,2,3. Refer to response provided to Individual 6 4. Refer to response provided to Individual 59 5.The visual impact of the proposed TTF has been evaluated in the EIA and mitigation measures have been identified accordingly. These include a facility design that incorporates soft landscaping, a relatively short stack, and the use of subdued, earth-toned colours to help the structure blend into its surroundings. The building is also visually segmented to enhance integration with the existing landscape. To further minimise visual disturbance, low-pollution lighting will be used, including strategically placed external lighting systems with shielded, downward-facing fixtures to reduce residual light spill. The visual impact assessment were also presented during the public hearing.
38.	Individual 38	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I thank you for your consideration.	Refer to response provided to Individual 4.
39.	Individual 39	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours' group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact	Refer to response provided to Individual 1.

		assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	
40.	Individual 40	Dear Sir, As a resident of Maghtab i would like to object to this application over concerns of air quality in the area and the health risks involved. Alternative sites to this project have not been given enough attention. Reasons previously cited for relocating all waste to Maghtab are not convincing enough. Proper impact assessments should be made.	Kindly refer to the response provided to Individual 6 regarding air quality. Kindly refer to response provided to Individual 4 regarding the alternative sites.
41.	Individual 41	Subject: Objection to Application PA/06096/23 (EA/00020/22) for New Thermal Plant Reference is made to the above application proposing the construction of a thermal plant. I strongly oppose the approval of this application for the following reasons: 1. Lack of Comprehensive Environmental Impact Assessment (EIA): The application appears to lack a holistic EIA, including cumulative impact analysis. 2. No Proper Evaluation of Alternative Locations: There seems to be no robust assessment of alternative sites beyond Maghtab. 3. Absence of Social Impact Assessment: No clear evaluation of the social consequences of the proposed facility has been provided. The facility will process hazardous waste streams such as carcasses, clinical waste, waste oils, abattoir by-products, and industrial chemicals. This raises grave concerns regarding its potential effects on public health, environmental sustainability, and the well-being of nearby villages and populated areas. Key Concerns: 1. Toxic Emissions: Hazardous waste incinerators release highly dangerous pollutants, including dioxins, furans, polychlorinated biphenyls (PCBs), and heavy metals (e.g., lead, cadmium, mercury). 2. Public Health Risks: Scientific evidence links exposure to these pollutants with cancer development, endocrine system disruptions, neurotoxicity, and respiratory illnesses such as asthma and chronic obstructive pulmonary disease (COPD). 3. Soil Contamination: Airborne toxins deposit onto agricultural soil, reducing its fertility and contaminating local crops, which may enter the food chain. 4. Water Pollution: Persistent organic pollutants (POPs) and heavy metals can leach into groundwater or run off into surface waters, compromising essential water resources. 5. Bioaccumulation in Food Chain: Contaminants from soil and water are absorbed by crops and livestock, intensifying toxicity levels in meat, milk, and eggs consumed by humans. 6. Persistent Environmental Pollutants: Dioxins and heavy metals are long-lasting, remaining harmful for decades and causing ecological damage.	Please find our replies hereunder: 1. Kindly refer to response provided to Individual 1 2. Kindly refer to response provided to Individual 4 3. Regarding the Social Impact Assessment, kindly refer to response provided to Individual 4. 4. Regarding the key concerns mentioned, please refer to the EIA studies as these impacts have all been evaluated in the respective chapters (air quality, water bodies, agriculture and ecology).

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

		For these reasons, I urge the rejection of this application to protect public health, the environment, and Malta’s agricultural and economic stability.	
43.	Individual 43	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am entirely against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is to no use to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. together.	Refer to response provided to Individual 1.
44.	Individual 44	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Salina, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER. Not to mention that this project will create a great inconvenience to the resident of Salina, even more than is currently being created by the terrible state of the Maghtab plant. For the wellbeing of the residents of Salina, I strongly plead that this project not go ahead and focus be placed on reducing the current odours being generated.	Refer to response provided to Individual 1.
45.	Individual 45	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people’s homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents’ quality of life and property values, as well as on Malta’s reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	Refer to response provided to Individual 25.

46.	Individual 46	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people's homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents' quality of life and property values, as well as on Malta's reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	Refer to response provided to Individual 25.
47.	Individual 47	Morning, I object to the approval of this application on the basis that; 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
48.	Individual 48	To eia.malta@era.org.mt Cc representations@pa.org.mt Re PA/06096/23 (EA/00020/22) Thermal Treatment Facility Object to the approval of this application on the basis that	Refer to response provided to Individual 4.

		1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	
49.	Individual 49	Dear All, I Object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I strongly urge you to consider these objections and I look forward to receiving a confirmation receipt of this email.	Refer to response provided to Individual 4.
50.	Individual 50	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people's homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible.	Refer to response provided to Individual 25.

		Furthermore, this project could have a profound negative impact on residents' quality of life and property values, as well as on Malta's reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	
51.	Individual 51	Dear board members, It makes no sense to build this facility at the proposed location, given that the North West and the West are the prevalent winds in the Maltese islands, meaning that on most days emissions will be directed towards nearby towns and villages.	The air dispersion of the incinerator has been formulated thanks to computer models that rely on realtime weather data and geographical information, such as the prevalent wind conditions in Malta. The results obtained from the model are explained in our response to Individual 6.
52.	Individual 52	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
53.	Individual 53	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
54.	Individual 54	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants cumulatively	Refer to response provided to Individual 1.

55.	Individual 55	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
56.	Individual 56	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
57.	Individual 57	Dear Sir, Madam Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incinerator plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion, one has to assess these plants 'cumulatively' i.e. TOGETHER.	Refer to response provided to Individual 1.
58.	Individual 58	To whom it may concern, I refer to the PA 6096/23 consultation notice that has just come to our attention and that we regretfully were therefore not in a position to attend. As a resident of Gharghur where I reside with my family and 3 young children aged 2, 6 and 8 respectively, we are extremely concerned about potential health hazards of this proposal. The facility is located less than 2 Km from our village, and directly in the path of the predominant Majistral wind that will inevitably end up dumping any toxic fumes right on us. Clearly with us being situated on higher ground, the proposed 25 m chimney will make no difference to mitigate the issue and if anything, directing fumes more on our direction. Further to the concerns stated above, in the assessment of the EIA, alternative locations assessed did not analyze alternative locations on the island, despite potential benefits of citing such a facility away from residential areas like Naxxar, Gharghur and Bahar ic-Caghaq which lie in the path of the prevailing NW winds. The alternative location assessment disrespects the spirit of this section of an EIA, whereby it is meant to assess other geographical locations on the island. An omission, which is not justified in anyway, given that the entity is a governmental one with potentially many other optional sites available to assess elsewhere on the island. We strongly urge that a more appropriate site is elected that would not dump toxic fumes on the various villages downwind of the facility. Kindly include us as official representees and keep us updated with the application process to be in a position to submit further representations and appeals as may be necessary.	Kindly refer to response provided to Individual 6 & Individual 22 regarding your concerns on air quality and public health impacts. Kindly refer to response provided to Individual 4 regarding alternative site assessments.

		Understandably, should this proposal in any case go through despite the evident health hazards to residents in the area, we will be holding the persons / authorities accountable accordingly. We will certainly not compromise with the health of our children and other residents in the area.	
59.	Individual 59	Naxxar Local Council Comments on the Environmental Impact Assessment Project Reference: Proposed Thermal Treatment Facility (TTF) at ECOHIVE, Maghtab PA/06096/23 EA/00020/22 The Environment and Resources Authority (ERA), The Naxxar Local Council has reviewed the Environmental Impact Assessment (EIA) for the proposed Thermal Treatment Facility (TTF) at the ECOHIVE complex in Maghtab. While we acknowledge Malta's need to improve its hazardous waste management, the Council raises serious objections and reservations regarding the location and the cumulative environmental and infrastructural impact of this project on Naxxar and surrounding localities. 1. Lack of a Comprehensive Masterplan Despite multiple projects being developed at ECOHIVE (including the TTF and an organic processing plant), there is no published or approved masterplan. A masterplan application was submitted (PA/8138/20) and later withdrawn, resulting in piecemeal development with no clear overview of the full long-term impact. This is not acceptable for a site of national and regional significance. 2. Increased Traffic and Heavy Vehicle Movements The EIA indicates that the current facility generates between 6,760 and 7,800 transport trips per year (130-150 vehicles per week). With waste volumes expected to double by 2045, it is reasonable to project that vehicle movements—especially heavy trucks—will also double. The cumulative effect on Naxxar’s road network, congestion, safety, and air quality is considerable and has not been adequately addressed. 3. No Serious Consideration of Alternative Locations Only four locations within the ECOHIVE site were assessed. No alternative locations across Malta were considered, calling into question the objectivity of the site selection process. A national-level facility demands a proper national site assessment. 4. Cumulative Environmental Impact The EIA identifies multiple environmental risks:	1. Malta’s Long Term Waste Management Plan 2021-2030 functions as a masterplan guiding waste management initiatives across the country. It encourages development of infrastructure like Waste-to-Energy, mechanical-biological treatment plant, and project regarding TTF. Therefore, the ECOHIVE Complex project should be considered a key component within this plan, designed to implement the strategic goals of the Malta Long Term Waste Management Plan and contribute to meeting Malta’s 2030 sustainability and waste management targets. 2. The number of trips by vehicles in 2045 is expected to be roughly equal to 270-290 vehicles per week. This is a crude estimate as many factors may influence the actual number of vehicles per week. 3. The alternative site assessment also considered the redevelopment of the existing Marsa plant. Based on technical and environmental criteria, Maghtab was identified as the most effective and appropriate location. Locating the new Thermal Treatment Facility at Maghtab allows it to form part of the existing waste management infrastructure. The site benefits from established road access, utilities, and logistical systems, enabling a more centralised and efficient waste management operation. This approach not only enhances system performance but also reduces reliance on landfilling, limits waste transport impacts, and helps lower operational costs. More details on this are available in the ‘Alternative Site’ section of the Environmental Impact Assessment. 4. The EIA considers the cumulative impact of all other waste management sites in the vicinity. See response provided to Individual 1. Operational reliability has been taken into full consideration in the development of the proposed facility. 5. The construction impacts have been assessed in all technical studies (e.g. water, ecology, noise etc) that have been presented in the EIA. The construction impacts vary from minor to major depending on the study being considered. Mitigation measures will be implemented to minimise dust, noise, and visual disturbance. These include strict controls on working hours, dust suppression techniques, noise-reducing practices and site management protocols in line with regulations. 6. The Waste-to-Energy (WtE) and Thermal Treatment Facility (TTF) serve different purposes: the WtE processes non-recyclable waste to divert it from landfills, while the the TTF is specifically intended for waste streams that cannot be recycled or even landfilled—such as abattoir, clinical, and certain industrial wastes—where thermal treatment is the safe and viable solution. It is important to note that the justification for the WtE facility was comprehensively evaluated in the Environmental Impact Assessment (EIA) prior to the granting of development consent. Both facilities are designed with state-of-

	* Air quality: A minor adverse impact on PM10 is projected near sensitive receptors. * Ecology and birds: Loss of protected trees, disruption of bird species including those sensitive to light and noise, and permanent ecological damage. * Water and soil: Risk of contamination from dust, impermeable surfaces, and runoff. * Operational reliability: The EIA does not adequately address the implications of inclement weather, such as how waste will be managed if the facility is forced to temporarily shut down due to storms, flooding, or other disruptions. The Council is concerned about the potential build-up of untreated hazardous waste during such events and how this will be safely handled. While the document outlines mitigation measures, confidence in enforcement remains low. Malta has a full legal framework for environmental protection, yet practical control, monitoring, and compliance are frequently lacking. The Council insists that robust and transparent enforcement mechanisms be put in place and clearly communicated. 5. Significant Construction Impacts The Council notes that adverse effects are not limited to the operational phase. The construction period will bring major disruption through noise, dust, heavy machinery, and landscape degradation. These temporary impacts can stretch over years and should not be dismissed as minor. 6. Second Incinerator in Maghtab This development would result in two incineration facilities within the same area, creating a disproportionate burden on Maghtab and its surrounding communities. This raises serious fairness and planning equity concerns. 7. Inappropriate Location The issue is not whether Malta needs a new TTF—it is whether Maghtab in Naxxar is the appropriate location. This Council maintains that it is not, for the following reasons: * It is an ODZ area under ongoing pressure from infrastructure creep. * It is exposed to prevailing winds, which could carry airborne emissions across wide areas of Malta. * It is already overburdened with national waste infrastructure, with no clear benefit provided to the hosting locality. Conclusion In view of the above, the Naxxar Local Council: * Objects to the proposed development in its current form and location. * Demands a national waste infrastructure masterplan before further projects at ECOHIVE are approved.	the-art flue gas treatment systems and online monitoring technologies to ensure continuous environmental control. The Environmental Impact Assessment (EIA) thoroughly evaluated the cumulative effects of both facilities. The Environmental Impact Assessment included a dedicated assessment of all sensitive receptors, including schools, households and other facilities within the area of influence. The facility will use Best Available Technology (BAT) and a robust multi-barrier emissions control system to minimise environmental and health risks. Air dispersion modelling found no significant adverse health effects, even in worst-case scenarios. Only one sensitive receptor (R27), an agricultural plot, may experience a minor cumulative impact due to the Thermal Treatment Facility and the adjacent Waste-to-Energy Plant, which remains far below health thresholds. More importantly, all projected emissions fall well below the thresholds set by the EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC), ensuring the protection of public health. 7. With regard to the location, please refer to the response provided under point 3. Regarding Prevailing wind patterns, kindly refer to the response provided to Individual 23. Regarding air quality, kindly refer to the response provided to Individual 6. The new Thermal Treatment Facility (TTF) is a key component of Malta’s sustainable waste management strategy and directly supports the transition to a circular, low-emissions economy. Key environmental benefits include: • Replacing an outdated facility with one that incorporates Best Available Technology • (BAT), including advanced filtration systems and real-time emission monitoring. • Treating unavoidable hazardous waste locally, reducing reliance on waste exports and associated emissions. • Complying with the EU Waste Hierarchy by managing waste that cannot be reduced, reused, or recycled. • Supporting Malta’s Long Term Waste Management Plan 2021-2030, (2021–2030) and reducing dependence on landfilling. • Achieving emission levels well below EU thresholds, as verified by the independent Environmental Impact Assessment Kindly refer to response provided to Individual 23
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		* Requests binding guarantees and oversight mechanisms to ensure environmental and health safeguards are enforced. * Insists on fairer distribution of national infrastructure, avoiding the excessive concentration of polluting activities in one locality.	
60.	Individual 60	I am writing in regards to the Proposed Thermal Treatment Facility in the Ecohive Complex 06096/23. It is expected that the biggest impact of the incineration activity will be through aerial emissions, with a major adverse impact rather than the stated moderate adverse impact. These may include flue gas, metaloxides, nitrogen oxides and sulphur oxides which might have significant ecological and socio-economic implications on areas present in the windward direction^{1,2}. A comprehensive air dispersion model is required to assess the potential impact of emissions from the proposed incinerator on ambient air quality. We suggest expanding the buffer zone to account for the extent of aerial pollution rather than the standard 100 meters. This is anticipated to have a detrimental effect on the quality of life for residents near the proposed site. The released particulate matter can settle on land and water, impacting soil and surface water quality, as well as groundwater. This may lead to bioaccumulation in plant species. Given that the proposed scheme is within an Agricultural Value area, it's crucial to consider this impact, particularly since it's generally advised to avoid growing food near incinerators. Waste produced by the incineration activity should be considered as an impact and mitigation actions should be clearly stated. The proper handling and disposal of slag, fly ash and bottom ash, which may contain hazardous substances, should be detailed. It should be a priority to find ways to avoid contamination or incidental spill of these wastes during transportation.	Kindly refer to the air quality studies presented. The study considered an area of influence of 113km², not 100m as stated. Air dispersion modelling has also been carried out and confirmed that the impact will be mostly negligible, with one exception of a minor adverse impact on cumulative PM₁₀ emissions at R27 (an agricultural plot) in Magtab. All other pollutants (such as dioxins, heavy metals etc) have been modelled and confirmed to be below the established EU legal limits. Pollutant deposition on agricultural land and soil has also been modelled and studied with negligible results obtained. Disposal of slag, fly ash and bottom ash are also clearly explained in the Introductory Chapters and Waste Chapters of the Coordinated Assessment report.

		I have also carried out quick research about Incinerators and the effect on the vicinity and it is very worrying. https://www.nottinghamshire.gov.uk/media/110343/kc8-the-health-effects-of-waste-incinerators-4th-report-of-the-british-society-for-ecological-medicine-second-edition-june-2008.pdf	
61.	Individual 61	Good evening, We wish to register our objection to the proposed development in caption:	
62.	Individual 62	Good evening, Further to the public consultation held a few days ago, I would like to express my concern regarding the proposed Thermal Treatment Facility. I am a resident in the vicinity of the proposed plant since I live in Naxxar, and can attest first-hand to the wind-borne pollution from which we suffer constantly, with the emissions from the current Maghtab in one direction and the constant wind-borne dust from the quarries in the vicinity. The additional emissions of this proposed incineration activity will add more dangerous wind-borne emissions, among these dangerous metal oxides, nitrogen oxides and sulphur oxides. Apart from the direct impact of the emissions, the released particulate matter will settle on land and water, impacting soil and surface water quality, as well as groundwater. This will lead to the contamination of any food growing in the area apart from affecting the water supply. Several international studies have been made public regarding the contamination produced by Incinerators. Among the hazards scientifically established, direct correlation to increased incidence of cancer and neurological diseases have been identified. I strongly petition that this development is not built, for the health of our current and future generations. I thank you for your consideration,	Kindly refer to response provided to Individual 6 regarding your comments on particulate matter and air emisisions from the new plant.
63.	Individual 63	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is not done correctly, to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively".	Refer to response provided to Individual 1.
64.	Individual 64	Dear Sir/Madam, Further to the recent ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as residents of Naxxar and members of the Naxxar Neighbours Group we hereby declare that we are not in favour of the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for our decision is that the impact assessments that have been carried out are being assessed on an individual basis. To be meaningful, one has to assess the proposed plants cumulatively.	Refer to response provided to Individual 1.

65.	Individual 65	Good evening, Further to the public consultation held a few days ago, I would like to express my concern regarding the proposed Thermal Treatment Facility. I am a resident in the vicinity of the proposed plant since I live in Naxxar, and can attest first-hand to the wind-borne pollution from which we suffer constantly, with the emissions from the current Maghtab in one direction and the constant wind-borne dust from the quarries in the vicinity. The additional emissions of this proposed incineration activity will add more dangerous wind-borne emissions, among these dangerous metal oxides, nitrogen oxides and sulphur oxides. Apart from the direct impact of the emissions, the released particulate matter will settle on land and water, impacting soil and surface water quality, as well as groundwater. This will lead to the contamination of any food growing in the area apart from affecting the water supply. Several international studies have been made public regarding the contamination produced by Incinerators. Among the hazards scientifically established, direct correlation to increased incidence of cancer and neurological diseases have been identified. I strongly petition that this development is not built, for the health of our current and future generations. I thank you for your consideration,	Refer to response provided to Individual 62.
66.	Individual 66	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
67.	Individual 67	Dear Sir/ Madam Further to the consultation meeting on the 23rd April regarding PA/06096/23 (EA/0020/22), as a resident of Naxxar I wish to express my total disagreement with the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason is impact assessment carried out was not carried out in the correct manner. It failed to assess the plants "cumulatively" and not on an individual basis. An incinerator will have negative long term effects on the health and well being of the citizens of Naxxar and the entire island. It is well known that incinerators are harmful to health and in the US and other EU countries it is being considered as a very last option. I request that the project should be withdrawn and alternative ways of managing waste should be studied.	Regarding the cumulative assessment and air quality impacts please refer to our response to Individual 1 and 6.

68.	Individual 68	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
69.	Individual 69	Dear Sirs, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
70.	Individual 70	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
71.	Individual 71	I am writing in regards to the Proposed Thermal Treatment Facility in the Ecohive Complex 06096/23. It is expected that the biggest impact of the incineration activity will be through aerial emissions, with a major adverse impact rather than the stated moderate adverse impact. These may include flue gas, metaloxides, nitrogen oxides and sulphur oxides which might have significant ecological and socio-economic implications on areas present in the windward direction^{1,2}. A comprehensive air dispersion model is required to assess the potential impact of emissions from the proposed incinerator on ambient air quality. We suggest expanding the buffer zone to account for the extent of aerial pollution rather than the standard 100 meters. This is anticipated to have a detrimental effect on the quality of life for residents near the proposed site. The released particulate matter can settle on land and water, impacting soil and surface water quality, as well as groundwater. This may lead to bioaccumulation in plant species. Given that the proposed scheme is within an Agricultural Value area, it's crucial to consider this impact, particularly since it's generally advised to avoid growing food near incinerators. Waste produced by the incineration activity should be considered as an impact and mitigation actions should be clearly stated. The proper handling and disposal of slag, fly ash and bottom ash, which may contain hazardous substances, should be detailed. It should be a priority to find ways to avoid contamination or incidental spill of these wastes during transportation. I have also carried out a quick research about Incinerators and the effect on the vicinity and it is very worrying. https://www.nottinghamshire.gov.uk/media/110343/kc8-the-health-effects-of-waste-incinerators-4th-report-of-the-british-society-for-ecological-medicine-second-edition-june-2008.pdf	Refer to response provided to Individual 60.

72.	Individual 72	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
73.	Individual 73	I am writing in regards to the Proposed Thermal Treatment Facility in the Ecohive Complex 06096/23. It is expected that the biggest impact of the incineration activity will be through aerial emissions, with a major adverse impact rather than the stated moderate adverse impact. These may include flue gas, metaloxides, nitrogen oxides and sulphur oxides which might have significant ecological and socio-economic implications on areas present in the windward direction^{1,2}. A comprehensive air dispersion model is required to assess the potential impact of emissions from the proposed incinerator on ambient air quality. We suggest expanding the buffer zone to account for the extent of aerial pollution rather than the standard 100 meters. This is anticipated to have a detrimental effect on the quality of life for residents near the proposed site. The released particulate matter can settle on land and water, impacting soil and surface water quality, as well as groundwater. This may lead to bioaccumulation in plant species. Given that the proposed scheme is within an Agricultural Value area, it's crucial to consider this impact, particularly since it's generally advised to avoid growing food near incinerators. Waste produced by the incineration activity should be considered as an impact and mitigation actions should be clearly stated. The proper handling and disposal of slag, fly ash and bottom ash, which may contain hazardous substances, should be detailed. It should be a priority to find ways to avoid contamination or incidental spill of these wastes during transportation. I have also carried out a quick research about Incinerators and the effect on the vicinity and it is very worrying. https://www.nottinghamshire.gov.uk/media/110343/kc8-the-health-effects-of-waste-incinerators-4th-report-of-the-british-society-for-ecological-medicine-second-edition-june-2008.pdf	Refer to response provided to Individual 60.
74.	Individual 74	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
75.	Individual 75	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. I must point out that the impact assessment carried out is useless to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants cumulatively, i.e. together.	Refer to response provided to Individual 1.

76.	Individual 76	I am writing in regards to the Proposed Thermal Treatment Facility in the Ecohive Complex 06096/23. It is expected that the biggest impact of the incineration activity will be through aerial emissions, with a major adverse impact rather than the stated moderate adverse impact. These may include flue gas, metaloxides, nitrogen oxides and sulphur oxides which might have significant ecological and socio-economic implications on areas present in the windward direction^{1,2}. A comprehensive air dispersion model is required to assess the potential impact of emissions from the proposed incinerator on ambient air quality. We suggest expanding the buffer zone to account for the extent of aerial pollution rather than the standard 100 meters. This is anticipated to have a detrimental effect on the quality of life for residents near the proposed site. The released particulate matter can settle on land and water, impacting soil and surface water quality, as well as groundwater. This may lead to bioaccumulation in plant species. Given that the proposed scheme is within an Agricultural Value area, it's crucial to consider this impact, particularly since it's generally advised to avoid growing food near incinerators. Waste produced by the incineration activity should be considered as an impact and mitigation actions should be clearly stated. The proper handling and disposal of slag, fly ash and bottom ash, which may contain hazardous substances, should be detailed. It should be a priority to find ways to avoid contamination or incidental spill of these wastes during transportation. I have also carried out a quick research about Incinerators and the effect on the vicinity and it is very worrying. https://www.nottinghamshire.gov.uk/media/110343/kc8-the-health-effects-of-waste-incinerators-4th-report-of-the-british-society-for-ecological-medicine-second-edition-june-2008.pdf	Refer to response provided to Individual 60.
77.	Individual 77	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. I would also add that common sense would dictate that if the prevailing wind is from the northwest that the incinerator would be better located in the south of the island so that the sea is downwind of the incinerator and not a good portion of Malta being densely populated downwind of it and subjected to whatever toxins and pollutants.	Refer to response provided to Individual 1.
78.	Individual 78	To whom this may concern, I kindly make note of the observation made below for which I believe the EIA should address further. In the assessment of the EIA, the alternative locations assessed remain limited to the Maghtab complex. They did not analyze alternative locations on the island, despite clear potential benefits of citing such a facility away from residential areas like Naxxar, Gharghur and Bahar ic-Caghaq which lie in the path of the prevailing NW winds. The alternative location assessment disrespects the spirit of this section of an EIA, whereby it is meant to assess other geographical locations and alternative sites elsewhere on the island. An omission, which is not justified in anyway, given that the entity is a governmental one with potentially many other optional sites available to assess elsewhere on the island. Further to this, while centralizing majority of operations in one complex might have certain benefits (which will likely be mostly enjoyed by the Operator rather than the general public), an analysis should be made weighing trade-offs between this justification and choosing a site elsewhere on the island, cited away from major residential areas.	For further information on the justification of the site, please refer to our response to Individual 4. Concerns regarding air quality and prevailing winds have been studied in detail in the air dispersion models included within the air quality technical study. For further information please refer to our response to Individual 6.

79.	Individual 79	Dear Sir/Madam, Attached please find my objections to PA/06096/23 (EA/00020/22) as part of the public consultation process. Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), I would like to submit my objections in writing as part of ERA's consultation process, with the hope that these points and those submitted by other residents of the same area, will not be ignored. I hereby declare that I am totally against the construction of the proposed Thermal Treatment Facility (TTF) and any other waste incineration plants at Maghtab. Please note that I am submitting these points as a resident of Naxxar and a member of the Naxxar Neighbours group. That said, if this project goes ahead, it will have a huge impact on a large number of localities. According to the map in figure 1 of the Coordinated Assessment presented by AIS Environment, the following localities fall within the 113 square km area of influence within the 6km radius around the TTF: Naxxar, St Paul's Bay, Mosta, Gharghur, Lija, Attard, Balzan, Iklin, B'kara, San Gwann, Msida, Swieqi, Pembroke, St Julians, Sliema, Gzira, Rabat and Mgarr. Below please find the main reasons for my objections and concerns for your consideration: Collective and Cumulative Impact: The project is being presented in a piecemeal way, one incinerator/plant at a time, rather than the whole collective project. This means that we are not seeing the cumulative effect of the whole project. The question remains as to why all these plants and incinerators are going to be at such close proximity to each other and why they are all in the same area of Maghtab (Naxxar). With a history of incidents and fires in waste management plants, the area of Maghtab in Naxxar is becoming one of very high risk. This issue is being ignored by the reports presented so far. The Site and the Wind: There is nothing which indicates or justifies why this site was chosen. With prevailing winds from the North and North West (over 60%), the impact from pollutants (including dust and ash particles) will spread towards localities on the inland, particularly along the coast from Bahar Ic-Caghaq, Madliena, Swieqi, Pembroke, St Julians, Sliema, Gzira, and even as far as Valletta. Residents are Being Ignored: As I pointed out during the public hearing, I am very concerned that the objections and concerns of residents are being ignored. In the document Project Description Statement Report for Thermal Treatment Facility (As per ERA requirements for PA/06096/23), a document of 172 pages, there is hardly any reference to the residents. Greenwashing: Greenwashing is the practice of conveying a false impression or providing misleading information about how a company's products are more environmentally sound than they truly are. Here's how the Echo Hive project could be perceived as greenwashing: Focus on Waste-to-Energy: A significant component of Echo Hive is the waste-to-energy (WtE) facility. While WtE diverts waste from landfills and generates electricity, it is not a carbon-neutral solution. The incineration process releases greenhouse gases, including CO2, contributing to climate change. Promoting WtE as a "green" solution can be misleading, as it detracts from the need for more sustainable practices like waste reduction and increased recycling. Continued Landfilling: Despite the new facilities, Malta will continue to rely on landfilling for a significant portion of its waste. The project does not eliminate the problem of waste generation but rather shifts some of it from landfills to incineration. Controversy and Opposition: The project has faced controversy and opposition due to concerns about its environmental impact, including potential air pollution from the WtE facility and the siting of the project in a sensitive area. These controversies raise questions about the project's overall sustainability and whether it truly represents a genuine commitment to environmental protection.	Please note our replies hereunder: - Regarding cumulative impacts, refer to our response provided to Individual 1 - Regarding concern from pollutants, refer to our response provided to Individual 6 - Regarding residents, kindly note that the EIA uses other terms such as "Receptors". This term encapsulates various forms of human presence e.g.: residents, employees, passers-by, schools, places of worship, commercial areas, agricultural land etc. - Announced in 2020, the ECOHIVE Project represents the largest investment ever made in Malta's waste management sector. It marks a transformative step forward, not only in waste management but also in enhancing the country's overall environmental performance and achieving its waste management targets. With an investment of €500 million, the project is enabling Malta to shift from a longstanding dependence on landfilling towards a circular economy, where waste is viewed as a resource. The results will be measurable, visible, and essential for Malta's future. For a comprehensive overview of ECOHIVE's scope and sustainability strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations. - This EIA is assessing the TTF facility not the WtE facility. The WtE facility has already been assessed in a previous EIA. The WtE facility was granted the necessary development permits to be constructed. - The waste that will be processed at the existing TTF cannot be landfilled. Hazardous waste cannot be landfilled in Malta. - Significant national efforts are underway to reduce waste at its source through comprehensive policy frameworks, regulatory enforcement, and public awareness initiatives, as outlined in Malta's Waste Management Plan. Active public participation is essential to the success of these measures. WasteServ supports these efforts through a range of initiatives, including the Malta Waste Reduction Awards and educational programs at the EcoHive Academy in Marsaskala. For a detailed overview of the WasteServ sustainable waste management strategy, please refer to the response provided to Individual 6. This outlines how the strategy prioritizes waste prevention, enhances material recovery, and ensures the safe treatment of unavoidable and non-recyclable hazardous waste using Best Available Techniques (BAT), in full compliance with EU regulations.
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		Emphasis on Technology: There is a risk that the project's emphasis on technological solutions like WtE overshadows the importance of behavioral changes and waste prevention. A truly sustainable approach to waste management requires a combination of technological advancements and efforts to reduce waste generation at the source. Citizen's Right to Information: As I pointed out in the public consultation, all citizens and residents have a right to access independent expert advice on the whole ECHOHive project. It is for this reason that the government, through ERA and/or Planning Authority or other ways, should finance the services of an expert chosen by the residents to give a truly independent opinion on the project and the consequences this will have on the health and quality of life of the residents living within the 6km radius indicated in the same document (see above). While fully supporting the residents who have already submitted their objections, I honestly hope these appeals will not fall on deaf ears. This is our life, our health and that of our families. Going ahead with the project as is will not be considered as a solution but an outright insult to all the residents.	
80.	Individual 80	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I thank you for your consideration.	Refer to response provided to Individual 4.
81.	Individual 81	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Salina, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Not to mention that this project will create a great inconvenience to the resident of Salina, even more than is currently being created by the terrible state of the Maghtab plant.	Refer to response provided to Individual 1.

		For the wellbeing of the residents of Salina, I strongly plead that this project not go ahead and focus be placed on reducing the current odours being generated.	
82.	Individual 82	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Salina, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Not to mention that this project will create a great inconvenience to the resident of Salina, even more than is currently being created by the terrible state of the Maghtab plant. For the wellbeing of the residents of Salina, I strongly plead that this project not go ahead and focus be placed on reducing the current odours being generated.	Refer to response provided to Individual 1.
83.	Individual 83	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Victoria Gardens, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is useless once the plants are being assessed on an individual/separate basis. To come anywhere close to the correct conclusion and before being able to form a proper opinion one the matter one has to assess these plants as one, that is together and not separate.	Refer to response provided to Individual 1.
84.	Individual 84	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
85.	Individual 85	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

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

89.	Individual 89	Dear Sir / Madam, Further to last Wednesdays ERA consultation meeting regarding PA/06096/23(EA/00020/22), as a resident of Madliena Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment is useless....to the extent that plants are being assessed on an individual basis , one has to assess these plants all together to come to the right conclusion.	Refer to response provided to Individual 1.
90.	Individual 90	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
91.	Individual 91	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
92.	Individual 92	Dear Sir/Madam, Further to the last ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
93.	Individual 93	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
94.	Individual 94	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab.	Refer to response provided to Individual 1.

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

98.	Individual 98	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. It is unacceptable that a Thermal Treatment Facility should even be considered in an area where it is so close to residents and Hotels. That's not to mention that it very close to the coast road which is used for tourists and locals alike. An eye- sore and a health hazard. This is a project that should be considered for a future land reclamation area - away from where it is being considered. Please re consider these plans which are to the detriment of all who live in the area.	Refer to response provided to Individual 1.
99.	Individual 99	WITHOUT PREJUDICE Dear Sir/Madam, RE: PA/06096/23 (EA/00020/22) Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. We are suffering respiratory and health problems with the toxins being emitted, for which we will be holding you all responsible. Furthermore, the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
100.	Individual 100	To whom it may concern, As a resident of Naxxar, we wish to object to an incinerator at Maghtab, especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced by mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust, where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful, even less so at Maghtab, where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation of its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 1 regarding cumulative impact assessments. The proposed incineration technology is in line with the highest market standards set up for waste incineration by the EU Commission. The emissions emitted from the proposed TTF have been assessed thanks to scientific air dispersion models. The results obtained from such models confirm that the emissions will be below the established air quality EU legal limits. Kindly refer to the air quality technical study for detailed information.
101.	Individual 101	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab.	Refer to response provided to Individual 1.

		The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	
102.	Individual 102	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
103.	Individual 103	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
104.	Individual 104	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that I feel the impact assessment carried out does not make sense because the plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
105.	Individual 105	Sir/Madam, It has come to my attention that the government plans to shut down the incinerator in Marsa and relocate it to Maghtab. As a resident of Bahar ic-Caghaq for the past 40 years, I feel compelled to express my deep concern and strong objection to this proposal. When I chose to remain in Bahar ic-Caghaq, it was with the promise that the dumping site would eventually be eliminated. Over the years, we have endured significant hardship, with the beautiful coast road often marred by the noxious smell and hazardous conditions that left us breathless. How is it possible that, instead of eliminating the dumping site as promised, this project proposes to worsen the situation by bringing a hazardous incinerator to this area? What is “green” about a project that jeopardizes agricultural land while producing deadly and poisonous emissions? Our health and well-being must be prioritized. Introducing an incinerator here will undoubtedly affect the air quality and the fragile balance of nature we still have.	The air quality impacts have been studied through air quality dispersion models. The main outcomes of the study are explained in our response to Individual 6. The air quality technical study provides detailed insight on the outcomes from the model. Current environmental challenges stem from historical infrastructural limitations. In the absence of advanced waste treatment technologies such as Waste-to-Energy (WtE), despite source separation efforts non-recyclable waste has continued to be landfilled. As of 2024, 72% of municipal waste in Malta is still landfilled, while the national target outlined in the Long-Term Waste Management Plan 2021–2030 aims to reduce this figure to 10% by 2035. In response, Malta is undertaking a comprehensive and transformative overhaul of its waste management system, driven by substantial investments:

		I urge you to reconsider this project entirely. For the sake of our health, environment, and the promises made to the community, I strongly object to this proposal. Thank you for your attention to this matter.	• A new Materials Recovery Facility, to increase recycling rates and ensure Malta meets its EU recycling obligations. • A new Organic Processing Plant to convert organic waste into compost and energy, thereby contributing to circular economy objectives. • A new Skip Management Facility to process bulky mixed waste from skips and recover recyclable materials that would otherwise be landfilled. • Despite these robust waste prevention and recycling measures, a residual non-recyclable waste stream will inevitably remain. For this fraction, the Waste-to-Energy (WtE) facility plays a critical role by diverting it from landfills, recovering energy and valuable materials such as metals. • As for the subject of this EIA, the proposed Thermal Treatment Facility (TTF) addresses waste types, such as clinical, abattoir, pharmaceutical, and certain industrial wastes, that cannot be recycled or landfilled due to sanitary, technical or legal constraints. For these unavoidable and non-recyclable waste streams, the TTF provides a safe, controlled, and legally compliant treatment method, ensuring the protection of both human health and the environment. The facility will be equipped with advanced emissions control technologies in line with Best Available Techniques (BAT) and the Industrial Emissions Directive (2010/75/EU). The EIA included a dedicated assessment of all sensitive receptors, including schools, households and other facilities within the area of influence. The facility will use Best Available Technology (BAT) and a robust multi-barrier emissions control system to minimise environmental and health risks. Air dispersion modelling found no significant adverse health effects, even in worst-case scenarios. Only one sensitive receptor (R27), an agricultural plot approximately 400 metres from the facility, may experience a minor cumulative impact due to the Thermal Treatment Facility and the adjacent Waste-to-Energy Plant, which remains far below health thresholds. More importantly, all projected emissions fall well below the thresholds set by the EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC), ensuring the protection of public health.
106.	Individual 106	To whom this may concern, As a resident of Bahar ic-Caghaq, I am writing to express my strong objection to the proposed location of the incinerator. The prevailing northwesterly winds are likely to carry emissions directly over Bahar ic-Caghaq, which is located approximately one kilometer from the site. While the efficiency of the new incinerator may be assured, it is undeniable that its emissions will impact the air quality in its immediate surroundings. Given the proximity of Bahar ic-Caghaq to the proposed site, this would inevitably affect our community. I strongly urge you to reconsider the choice of location and prioritize areas where prevailing winds would not carry emissions over residential neighborhoods. Thank you for your attention to this matter.	Kindly refer to our response to Individual 6 regarding your concerns on air quality impacts.

107.	Individual 107	Dear All, Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I thank you for your consideration.	Refer to response provided to Individual 4.
108.	Individual 108	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare my opposition to the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason is that the impact assessment carried out is deceitful to the extent that plants are being assessed on an individual basis. Common sense as well as a professional approach dictate that to come anywhere close to scientifically correct and holistic conclusions which can be used to inform decisions in the extent and nature of the impact of these proposed constructions one has to assess these plants "cumulatively" i.e. TOGETHER. In the absence of any remedial action, the only conclusion possible is that decisions are being taken without any regard to the PA's social responsibilities and respect for professional honesty.	Refer to response provided to Individual 1.

109.	Individual 109	Dear Sirs Following the ERA meeting of the 23 April 2025 at the Naxxar Local Council we are writing to formally express our strong objection to the proposed incinerator project at Maghtab. This objection is based on the fact that 1 no cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. 2 this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? We urge ERA to halt this project until a thorough cumulative impact assessment is completed and made publicly available. This is a matter of public interest, environmental protection, and basic civic responsibility.	Please find our replies hereunder: 1. Kindly refer to response provided to Individual 1 2. Kindly refer to response provided to Individual 100.
110.	Individual 110	Dear Sir/Madam Further to last Wednesday's ERA consultation meeting regarding the above application, as a resident of Madliena, Swieqi, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" ie. TOGETHER	Refer to response provided to Individual 1.
111.	Individual 111	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
112.	Individual 112	To whom it may concern, I am writing in relation to the Environmental Impact Assessment for application PA/06096/23 (EA/00020/22) concerning the proposed Thermal Treatment Facility at Maghtab. I wish to express my concern regarding the proposal, particularly the fact that no alternative locations were properly considered, and that no holistic impact assessment has been undertaken to fully evaluate the cumulative effects on the surrounding areas, including Gharghur. As a resident who will be directly affected, I am very concerned about the potential air quality issues and the broader environmental and health implications.	Refer to response provided to Individuals 4 and 6.

		I respectfully request to be kept informed of all developments related to this application and to be invited to the public hearing, in line with my rights. Thank you for your attention to this important matter.	
113.	Individual 113	Dear Sir/Madam Further to last Wednesday's ERA consultation meeting regarding the above application, as a resident of Madliena, Swieqi, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" ie. TOGETHER.	Refer to response provided to Individual 1.
114.	Individual 114	Good morning, This is to object the proposed thermal treatment facility. Location Birguma area, Naxxar.	
115.	Individual 115	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
116.	Individual 116	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
117.	Individual 117	To whom in may concern, I am writing to submit my formal objection to the proposed development of a waste incinerator in Maghtab. While I recognise the necessity of sustainable waste management, I am deeply concerned about the significant environmental, health, and socio-economic risks that this incineration facility may pose to the local community, especially given the site's location within an area of agricultural land and residences. I am deeply concerned about the multiple environmental and health-related risks associated with this project: 1. Hazardous Waste By-products	Please find our replies hereunder: 1. The handling of waste generated from incineration is described in the EIA reports (Coordinated Assessment Report). All of these waste management procedures will be regulated by the IPPC permit (operational permit) for the TTF, issued by the ERA before it is rendered operational. 2. The effects of particulate matter deposition, material deposition on soil/agriculture, and dispersion of other harmful pollutants have been studied in great detail in the air quality study. Kindly refer to our response to Individual 6. 3. The buffer zone considered for the air quality models encapsulated a 113km² buffer zone, not a 100m buffer zone.

		The waste produced by incineration, including slag, fly ash, and bottom ash, should be considered a significant environmental impact. These by-products can contain hazardous substances, and the proposal lacks detailed mitigation measures to ensure their proper handling, transportation, and disposal. There is a clear need to prevent contamination and avoid the risk of incidental spills during transport. 2. Contamination of Land and Water Sources Particulate matter released from the incinerator can settle on surrounding land and water bodies, potentially impacting soil, surface water, and groundwater quality. This is of particular concern given that the proposed site lies within an Agricultural Value area. The potential for bioaccumulation in plant species further underscores the risks, particularly for crops intended for human consumption. It is generally advised not to grow food near incinerators due to this very threat. 3. Inadequate Air Quality Modelling and Buffer Zone A comprehensive air dispersion model is essential to accurately assess the potential impact of emissions on ambient air quality. The current buffer zone of 100 meters is insufficient and should be expanded to reflect the wider area that may be affected by aerial pollution. This is particularly important given the likely dispersion of emissions depending on prevailing wind patterns and topography. 4. Underestimated Impact on Public Health and Quality of Life The Environmental Impact Assessment (EIA) claims a “moderate adverse impact” from aerial emissions; however, this is likely a significant underestimation. The incineration process is expected to emit flue gases, metal oxides, nitrogen oxides, and sulphur oxides. These pollutants can have detrimental effects on both human health and the natural environment, particularly for residents in the windward direction from the facility. The impact should be classified as **major adverse**, not moderate. 5. Socio-Ecological Consequences The long-term ecological and socio-economic implications of this project have not been adequately addressed. Aerial emissions and toxic residues could compromise agricultural viability, reduce local biodiversity, and harm residents’ well-being and property values. Given the seriousness of these concerns, I respectfully urge the Planning Authority to reconsider this project. Internationally, we are seeing a shift away from incinerators as sustainable waste management strategies. Let Malta learn from the mistakes of others, rather than repeat them. The health of our communities, the sustainability of our environment, and the integrity of our food systems must be prioritised over short-term infrastructural developments. We deserve better.	4. Air dispersion modelling found no significant adverse health effects, even in worst-case scenarios. Only one sensitive receptor (R27), an agricultural plot, may experience a minor cumulative impact for PM₁₀ emissions due to the Thermal Treatment Facility and the adjacent Waste-to-Energy Plant, which remains far below health thresholds. The remaining harmful pollutants being mentioned, are predicted by the model to be below the established EU legal limits for such air quality parameters. 5. The impacts from the dispersion model have been considered in all the other EIA technical chapters including the ones mentioned. Regarding sustainable waste management In Malta, the top priorities in waste management continue to focus on sustainable practices aligned with the waste hierarchy, particularly waste prevention and recycling in line with 2008/98/EC – Waste Framework Directive. For a comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations.
118.	Individual 118	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.

119.	Individual 119	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
120.	Individual 120	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
121.	Individual 121	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

122.	Individual 122	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I STRONGLY object to the approval of this application on the basis that: 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. MOREOVER, with North Westerly winds being the most predominant on the Maltese islands this project will effectively contaminate the most densely populated and touristic side of the Maltese islands. See attached. Monitoring for possible cumulative impacts will NOT SOLVE the problem once the investment is already made. I urge the authorities not to review the application until a PROPER IMPACT ASSESSMENT is undertaken in line with the spirit of what an EIA and SIA should do. Thank you for your consideration.	Refer to response provided to Individual 4.
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123.	Individual 123	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Ibrag, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that the plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
124.	Individual 124	Dear Sir/Madam Further to list of Wednesday Sent from my iPad	

125.	Individual 125	PA/06096/23 (EA/00020/22) Thermal Treatment Facility Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I thank you for your consideration.	Refer to response provided to Individual 4.
126.	Individual 126	Good morning, Further to the public consultation held a few days ago, I would like to express my concern regarding the proposed Thermal Treatment Facility. I am a resident in the vicinity of the proposed plant since I live in Birguma, and can attest first-hand to the wind-borne pollution from which we suffer constantly, with the emissions from the current Maghtab in one direction, the emissions from the Bitmac plant in another wind direction and the constant wind-borne dust from the quarries in the vicinity. The additional emissions of this proposed incineration activity will add more dangerous wind-borne emissions, among these dangerous metal oxides, nitrogen oxides and sulphur oxides. Apart from the direct impact of the emissions, the released particulate matter will settle on land and water, impacting soil and surface water quality, as well as groundwater. This will lead to the contamination of any food growing in the area apart from affecting the water supply. Several international studies have been made public regarding the contamination produced by Incinerators. Among the hazards scientifically established, direct correlation to increased incidence of cancer and neurological diseases have been identified. I strongly petition that this development is not built, for the health of our current and future generations. I thank you for your consideration,	Refer to response provided to Individual 62.

127.	Individual 127	Hi, Regarding PA/06096/23 (EA/00020/22); We're writing to voice our serious concerns about the proposed incineration plants at Maghtab. After attending the ERA meeting on 23 April, it's clear that this project is moving forward without a proper cumulative assessment of all the plants together. Such an assessment is crucial to understand the true environmental impact and, ultimately, how it will affect our lives. We strongly oppose this project for this reason and urge the ERA to reconsider proceeding until a thorough and comprehensive study is carried out. We are very willing to provide further input as needed.	Refer to response provided to Individual 1.
128.	Individual 128	To whom it may concern, Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
129.	Individual 129	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

130.	Individual 130	Sinjur/a, Qed nikteb din l-ittre biex nopponi għall-bini tal-incineratur ġewwa l-Magħtab, għax nemmen li se jkun ta' detriment għas-saħħa ta' min joqgħod fl-akwati u l-lokalitajiet tal-madwar. Nemmen li proġett bħal dan għandu jiġi evitat (pajjiżi oħra qed ineħħuhom) jew isir f'post mhux abitat. Grazzi bil-quddiem u nittama li din it-talba tiġi kkunsidrata.	Irreferi għar-risposta ipprovduta lill-Individwu 21.
131.	Individual 131	Dear Sir/Madam, Reference is made with regards to the EIA Public Hearing (PA/06096/23 & EA/00020/22), held on Wednesday, the 23rd of April, 2025, which I attended in person. I, the undersigned, [REDACTED] holder of identity card no. [REDACTED] object to the construction and implementation of this project for the same reasons put forward by those stakeholders who aired their rooted concerns during the public hearing, and the reasons listed immediately hereunder. The very well prepared presentation proved to be nothing more than a greenwashing exercise with which to convince those concerned stakeholders present that this is the only right way forward. During the presentation, those present were shown that a large section of the existing agave succulent plants that adorn a large section of the coast road, will be replaced by a monstrous eyesore, over an area measuring not less than 18 tumoli of land that was described to be land of low value. My main concerns with regards to this incinerator project or cumulative set of incinerators are: 1. The Health Risks and Hazards; 2. The Ecological and Environmental Impact on the surrounding environment; 3. The Risk Assessment in itself; and 4. The Economic Impact. Health Risks and Hazards. The location of the incinerator will be affecting a multitude of densely populated villages within the immediate vicinity of the EcoHive facility. Prevailing North Westerly winds will be driving toxic fumes towards the San Gwann, Swieqi, St. Julians, Sliema, Gzira, Msida and beyond, while the North Easterly winds will direct the same toxic fumes towards Naxxar, Mosta, Burmarrad, Wardija and Mgarr, through the adjacent existing geological faults and valleys. One must bear in mind that the toxic fumes emitted will consist of dioxins, polychloro biphenols and heterocyclic organic compounds, which are in themselves considered as hazardous, amongst others. The health risks of these toxic fumes to those living within the immediate vicinity of this facility should be stopped at source, to avoid an increase in medical complications. The Ecological and Environmental Impact on the surrounding environment. The location of the facility within the immediate vicinity sea, the agricultural fields of Burmarrad and Wardija, will only endanger the sustainability of our foodchain because the toxic chemicals emitted from the EcoHive facility will settle onto the surrounding agricultural fields, and enter our foodchain. One must also underline the effect that these toxic chemicals will have on the surrounding flora, fauna and marine biodiversities. The Risk Assessment in itself. The risk assessment presented was very misleading and deceptive, given that the risk assessment was carried out with regards to one (1) incinerator, when it is public knowledge that four (4) or more incinerators are already planned to be installed within the EcoHive facility. The risk assessment results presented to those stakeholders present were highly misleading and a fallacious attempt to greenwash what could prove to be an environmental, ecological and health hazard.	The presentation served to describe the project components, construction interventions, operational logistics, environmental impacts and mitigation measures. Both positive and negative environmental impacts were clearly highlighted. The Agave succulent plants are not located on the site of the proposed TTF. They're located closer to the coastline. The area that will be taken up by the proposed TTF comprises solely of agricultural land and various trees and shrubs as documented in EIA studies and explained during the presentation. Regarding health risks and air quality impacts please refer to response provided to Individual 6. The EIA considered the cumulative impact of the waste management facilities at the ECOHIVE complex, including the emissions from both the proposed TTF and the approved WtE. Regarding offshore TTF An offshore facility would require land reclamation at sea causing further environmental impacts and would also entail significant emissions to transfer waste from land via vessels to the offshore facility. Additionally, TTF shall be located in an area that guarantees easy, uninterrupted and efficient logistics for waste transport, reliable access for trucks and other carriers, proximity to emergency response services. Offshore locations cannot meet the specific requirements of such facility and would introduce substantial operational and environmental risks, making such a setup impractical.

		The Economic Impact. The tourism industry which is concentrated in the areas within reach of the EcoHive facility will definitely experience a negative impact, because the winds will never cease to fan the billowing toxic fumes unto the surrounding areas. Once this facility is operating, our country will definitely have to concentrate on trying to entice immense numbers of less discerning tourists to our country, within the foreseeable future, in order to sustain the Maltese economy, because the number of high end repeat / return tourists is set to decrease while large international corporate events such as the annual SIGMA Gaming Conference will seek out alternative locations elsewhere. Conclusions. The best way forward would be to consider different waste management strategies by: 1. Exporting waste to existing incinerators, abroad; or 2. Creating an offshore facility that will not affect the quality of life and livelihood of the Maltese.	
132.	Individual 132	Dear Sir/Madam, Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. For the above reasons, I urge the authorities to refuse this application.	Refer to response provided to Individual 4.
133.	Individual 133	To whom it might concern. As a resident of Malta I wish to object to an incinerator at the Maghtab, especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.

134.	Individual 134	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
135.	Individual 135	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
136.	Individual 136	Subject: Objection to PA/06096/23 (EA/00020/22) Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22) as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Please visit the below links to see what I/we mean. https://chesterpaej.org/house-bill-109-passed-the-committee/ (Cumulative Impact Bill) https://chesterpaej.org/chesters-battle-for-environmental-justice-is-continuing-delco-today-3-18-25/ (General Site) https://chesterpaej.org/why-is-incineration-bad/#:~:text=Incineration%20is%20the%20worst%20way,is%20a%20Zero%20Waste%20plan (Why is incineration toxic)	Refer to response provided to Individual 1.

137.	Individual 137	Dear Sir/Madam, We are writing to formally object to the proposed Thermal treatment facility development currently under review. The placement of such a facility so close to residential areas raises serious concerns about the detrimental impact on air quality and, consequently, on the health and well-being of the surrounding communities. It is well-established that incinerators emit pollutants, including particulate matter, dioxins, and heavy metals, which are known to cause respiratory illnesses and other long-term health problems. Furthermore, it is evident that insufficient environmental and public health studies have been conducted to justify the approval of this project. The absence of comprehensive, transparent, and independent assessments undermines any claim that the proposal is safe or sustainable. In the context of existing environmental obligations and the principles of precaution and prevention, it is imperative that public health is given absolute priority. We do not agree with this project on the basis that a cumulative assessment of all the plants operating together was not carried out. This independent assessment will indicate the real extent of the impact on the environment and thus our quality of life. Given these serious concerns, I urge the Authority to reject the proposed incinerator and to require an independent cumulative Environmental Impact Assessment (EIA) and Health Impact Assessment (HIA) before any such project is even considered. Additionally, alternative waste management solutions, which are safer and more sustainable, should be thoroughly explored. I trust that the Authority will fulfill its duty to protect the environment and public health.	Refer to response provided to Individual 6.
138.	Individual 138	To whom it may concern, As a resident of Naxxar, we wish to object to an incinerator at Maghtab, especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced by mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust, where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful, even less so at Maghtab, where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation of its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
139.	Individual 139	> Dear Sir/Madam, > Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. > > The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

140.	Individual 140	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
141.	Individual 141	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
142.	Individual 142	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
143.	Individual 143	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
144.	Individual 144	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/0020/22), as a resident of Naxxar and a member of the Naxxar Neighbours Group, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
145.	Individual 145	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact	Refer to response provided to Individual 1.

		assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	
146.	Individual 146	To whom it may concern, Please consider another location for the incinerator at Maghtab. As a resident, we are genuinely concerned about the health impact this incinerator will have on residents living nearby. We are also concerned with the vast scale of this project, imposing a threat on our surrounding environment and having a negative impact on the small towns nearby. Please understand our pleas as residents and imagine if this monstrous and unhealthy project was being proposed to be built in your backyard.	Refer to response provided to Individual 6.
147.	Individual 147	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to grant permission.	Refer to response provided to Individual 4.
148.	Individual 148	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that: 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed	Refer to response provided to Individual 4.

		site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities to refuse this application.	
149.	Individual 149	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22) as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Please visit the below links to see what I/we mean. https://chesterpaej.org/house-bill-109-passed-the-committee/ (Cumulative Impact Bill) https://chesterpaej.org/chesters-battle-for-environmental-justice-is-continuing-delco-today-3-18-25/ (General Site) https://chesterpaej.org/why-is-incineration-bad/#:~:text=Incineration%20is%20the%20worst%20way,is%20a%20Zero%20Waste%20plan (Why is incineration toxic)	Refer to response provided to Individual 1.
150.	Individual 150	RE INCINERATORS AT MAGHTAB: To whom it may concern, Following last Wednesday's 23rd April we strongly object to the proposed project. We DO NOT AGREE with this project on the basis that a CUMULATIVE ASSESSMENT has not been undertaken. Furthermore the harmful effects on the general public's health and wellbeing and on the environment will be catastrophic and detrimental to us and to future generations.	Refer to response provided to Individual 1.
151.	Individual 151	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
152.	Individual 152	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact	Refer to response provided to Individual 1.

		assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	
153.	Individual 153	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
154.	Individual 154	Dear Sir/Madam, Further to last Wenesday's ERA consultation meeting regarding PA/06096/23(EA/00020/22), as a resident of Naxxar and a member of Naxxa Neighbours group I am herby declare that I am Totallyagainst the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab.The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on and individual basis. To come anywhere close to the correct conclusion one has to assess these plants cumulatively, i.e TOGETHER.	Refer to response provided to Individual 1.
155.	Individual 155	Dear Sir or Madam, We are residents of Gharghur and sending this communication to STRONGLY OPPOSE the Maghtab Incinerator development.	
156.	Individual 156	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22) as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER. Please visit the below links to see what I/we mean. https://chesterpaej.org/house-bill-109-passed-the-committee/ (Cumulative Impact Bill) https://chesterpaej.org/chesters-battle-for-environmental-justice-is-continuing-delco-today-3-18-25/ (General Site) https://chesterpaej.org/why-is-incineration-bad/#:~:text=Incineration%20is%20the%20worst%20way,is%20a%20Zero%20Waste%20plan (Why is incineration toxic)	Refer to response provided to Individual 1.
157.	Individual 157	To whom it may concern, I am writing as a resident of Gharghur to formally express my strong objection to the proposed incinerator project planned in our community. Following discussions with other residents, and after reviewing the serious concerns already raised, I wish to highlight and reinforce	Please find our replies hereunder: 1. Refer to response provided to Individual 6. 2. Refer to response provided to Individual 6. 3. TTF will operate strictly within the emission limits and all other regulatory requirements set by the Environment and Resources

	the following points: 1. Public Health and Environmental Risk It is clear that the introduction of an incinerator brings unavoidable risks to human health, particularly regarding air quality and long-term exposure to harmful pollutants. Residents, including young families and vulnerable groups, will be directly and severely impacted. No reassurance on monitoring or auditing will fully negate the inherent risks associated with this type of facility. 2. Decline in Quality of Life The already existing waste facilities in the area have a negative impact on the environment, with odours, dirt, and pollution affecting daily life. The addition of an incinerator will only worsen these conditions, making the area increasingly unliveable and damaging to community well-being. 3. Lack of Trust in Project Management Given the current environmental mismanagement observed in Maghtab, many residents, including myself, lack confidence in the capability of the authorities involved to manage an even larger and more sensitive operation. Cleanliness, transparency, and accountability have not been sufficiently demonstrated to date. 4. Alternatives Exist As many citizens have pointed out, exporting waste remains a viable and preferable alternative. Furthermore, multiple studies and reports, including those by Zero Waste Europe, emphasize that new incinerators are incompatible with the EU's long-term sustainability agenda. Building another facility when surplus incineration capacity already exists elsewhere in Europe is a regressive move. 5. Lack of Meaningful Public Consultation Major infrastructural projects of this scale should be preceded by comprehensive and genuine public consultation. Residents' concerns must not only be heard but integrated meaningfully into decision-making. To date, the process has failed to reassure the affected communities. For all these reasons, I strongly urge the Government to reconsider and withdraw this project. Instead, efforts should focus on: * Waste minimisation and recycling initiatives aligned with European environmental targets, * Sustainable alternatives that do not further burden already impacted communities, * Transparent governance and public engagement moving forward. The residents of Maghtab and the surrounding localities deserve better. We deserve a clean, safe, and healthy environment to live and raise our families. Thank you for your attention to this urgent matter. I trust that the concerns of citizens will be given the serious consideration they merit.	Authority (ERA). The facility will be equipped with continuous online emission monitoring systems to ensure real-time compliance and full transparency. 4. While waste export remains a possible option, relying solely on it exposes Malta to external risks, such as changes in export regulations or limitations in the receiving countries' capacity and willingness to accept hazardous waste. Developing local treatment capacity enhances national resilience and ensures greater self-sufficiency in managing hazardous waste responsibly. Moreover, transporting hazardous waste abroad carries significant environmental implications, including a substantial carbon footprint from international shipping and the inherent risks associated with handling and transit. International obligations under the Basel Convention further support local treatment. Article 4.2(b) states that Parties should ensure the availability of adequate facilities for the environmentally sound management of hazardous wastes within their own territory whenever possible. Additionally, Article 4.2(d) calls for the reduction of transboundary movements of hazardous waste to the minimum necessary, in order to safeguard human health and the environment from the adverse effects of such movements. In Malta, the top priorities in waste management continue to focus on sustainable practices aligned with the waste hierarchy, particularly waste prevention and recycling in line with 2008/98/EC – Waste Framework Directive. For a comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations. 5. From 25th March 2024 to 5th May 2024, the public could contribute to the Terms of Reference for the Environmental Impact Assessment, which outlines the studies required for the assessment. Once the Environmental Impact Assessment was carried out, a newspaper advert was published on 9th March 2025 to inform the public that it was available. The consultation on the EIA reports commenced on this date and lasted until the 9th April 2025. This was followed by a public hearing held on 23rd April 2025, to present the Environmental Impact Assessment. The session was open to the general public, and attendees had the opportunity to ask questions and make comments. Following the hearing, the public had until 30th April to submit further comments.
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158.	Individual 158	RE INCINERATORS AT MAGHTAB: To whom it may concern, Following last Wednesday's 23rd April we strongly object to the proposed project. We DO NOT AGREE with this project on the basis that a CUMULATIVE ASSESSMENT has not been undertaken. Furthermore the harmful effects on the general public's health and wellbeing and on the environment will be catastrophic and detrimental to us and to future generations.	Refer to response provided to Individual 1.
159.	Individual 159	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena and a member of the Madliena residents' group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
160.	Individual 160	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
161.	Individual 161	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.

162.	Individual 162	Dear Sir/Madam, Following the meeting of the 23rd April 2025, (ERA Meeting at the Naxxar Local Council) I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. This objection is based on the fact that no cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. I urge ERA to halt this project until a thorough cumulative impact assessment is completed and made publicly available. This is a matter of public interest, environmental protection, and basic civic responsibility.	Refer to response provided to Individual 109.
163.	Individual 163	To Whom It May Concern, I am writing to formally oppose the proposed thermal facility within the Ecohive complex in Maghtab. As an engaged resident, I believe it is unacceptable for our community to become the site of a project that would further jeopardise our environment and air quality, contradicting the original vision for this area as a green space and park. The Maghtab waste facility has long been a source of controversy, and we must reevaluate its potential to be transformed into the green space that our community desperately needs. Malta is already grappling with some of the poorest air quality in Europe, and the introduction of a thermal plant, along with its related structures and wastewater treatment, would have dire consequences. For the well-being of our residents, I urge you to heed our concerns and take a stand against the proposed thermal facility.	Regarding air quality, kindly refer to the response provided to Individual 6 Regarding wastewater plant, all wastewater generated on-site will be collected and treated within the facility, ensuring full compliance with environmental standards and preventing any uncontrolled discharge
164.	Individual 164	To whom it may concern As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that, ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be a cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
165.	Individual 165	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala.	Refer to response provided to Individual 4.

		The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	
166.	Individual 166	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
167.	Individual 167	To whom it may concern, I am emailing to object to the incinerator plan at Maghtab.	
168.	Individual 168	Dear Sir/Madam, I refer to last Wednesday's ERA consultation meeting, PA/0696/23 (EA/00020/22) held at Salina Resort, and as a resident of Naxxar, and a member of Naxxar Neighbours' group, I am totally against the construction of the proposed thermal Treatment Facility and any other waste incineration plant at Maghtab. This is a hazardous waste incinerator, which we understand is moving forward without a cumulative impact assessment of the whole project, which is a source of pollution that will affect our health, together with our property. Thank you for your attention.	Refer to response provided to Individual 1.
169.	Individual 169	Good afternoon I am emailing to object to the incinerator plan at Maghtab.	
170.	Individual 170	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

171.	Individual 171	Dear Sir/Madam, Further to last Wenesday's ERA consultation meeting regarding PA/06096/23(EA/00020/22), as a resident of Naxxar and a member of Naxxa Neighbours group I am herby declare that I am Totallyagainst the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab.The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on and individual basis. To come anywhere close to the correct conclusion one has to assess these plants cumulatively, i.e TOGETHER.	Refer to response provided to Individual 1.
172.	Individual 172	Dear Sir/Madam, I refer to last Wednesday's ERA consultation meeting PA/0696/23 (EA/00020/22) held at Salina Resort and as a resident of Naxxar, a member of Naxxar Neighbours group, I together with my family of three, am totally against the construction of the proposed thermal Treatment Facility and any other waste incineration plant at Maghtab. This is a hazardous waste incinerator, which we understand is moving forward without a cumulative impact assessment of the whole project, which is a source of pollution that will affect our health, together with our property.	Refer to response provided to Individual 1.
173.	Individual 173	To whom it may concern, I, as a resident in Maghtab, strongly object to this project. The air pollution and the health risks to us residents will be serious and cancerous. Who will be responsible for such an occurrence on my children? How will the monitoring occur? Will these air quality tests be readily available to us for confirmation? How frequently will these be audited? Honestly, Wasteserv already has an impact on the local environment - the amount of dirt on streets which they never clean is ridiculous, the smells are uncontrollable - We, as residents, are not confident that they are competent enough to handle such a critical facility!! Also, this is not a need... The way forward should be to export waste and not take up more virgin land to build such monstrosity. Already existing Waste to energy incinerators in Europe have more capacity than needed, hence, there isn't the NEED to build this incinerator. Also, this goes against the EU's direction: https://zerowasteurope.eu/2021/05/wte-incineration-no-place-sustainability-agenda/ https://zerowasteurope.eu/2013/01/more-incineration-than-trash-to-burn-in-the-eu/ We strongly encourage you to reconsider and do not move forward with this project!	Refer to response provided to Individual 6 regarding air quality concerns. Regarding current environmental challenges, refer to response provided to Individual 105 Regarding air quality, the Environmental Impact Assessment included a dedicated assessment of all sensitive receptors, including schools, households and other facilities within the area of influence. The facility will use Best Available Technology (BAT) and a robust multi-barrier emissions control system to minimise environmental and health risks. Air dispersion modelling found no significant adverse health effects, even in worst-case scenarios. Only one sensitive receptor (R27), an agricultural plot approximately 400 metres from the facility, may experience a minor cumulative impact due to the Thermal Treatment Facility and the adjacent Waste-to-Energy Plant, which remains far below health thresholds. More importantly, all projected emissions fall well below the thresholds set by the EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC), ensuring the protection of public health. Regarding air monitoring, emissions from the stack will be continuously monitored using a Continuous Emissions Monitoring System (CEMS), which tracks pollutants in real time. A redundant CEMS unit will also be installed to ensure uninterrupted monitoring and to safeguard environmental and public health. Regarding local waste treatment over export, while waste export remains a possible option, relying solely on it exposes Malta to external risks, such as changes in export regulations or limitations in the receiving countries' capacity and willingness to accept hazardous waste. Developing local

			treatment capacity enhances national resilience and ensures greater self-sufficiency in managing hazardous waste responsibly. Moreover, transporting hazardous waste abroad carries significant environmental implications, including a substantial carbon footprint from international shipping and the inherent risks associated with handling and transit. International obligations under the Basel Convention further support local treatment. Article 4.2(b) states that Parties should ensure the availability of adequate facilities for the environmentally sound management of hazardous wastes within their own territory whenever possible. Additionally, Article 4.2(d) calls for the reduction of transboundary movements of hazardous waste to the minimum necessary, in order to safeguard human health and the environment from the adverse effects of such movements. In Malta, the top priorities in waste management continue to focus on sustainable practices aligned with the waste hierarchy, particularly waste prevention and recycling in line with 2008/98/EC – Waste Framework Directive. For a comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations.
174.	Individual 174	Dear Sir/Madam Further to last Wednesday's ERA konsultation meeting regarding PA/06096/23 (EA/0020/22), as a resident of Naxxar and a member of the Naxxar Neighbours Group, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Magtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
175.	Individual 175	Good afternoon, As a resident of Gharghur I concur with the below statement issued by my neighbour and friend architect [REDACTED] It is already bad enough that we have to deal with the dust and the smells coming off of that landfill and all the quarries in the vicinity. Kindly keep us posted with any updates but my wife and I and our three children completely oppose this proposal which clearly was not given enough thought.	Regarding Current environmental challenges, refer to response provided to Individual 105
176.	Individual 176	To Whom It May Concern, I am writing to formally express my strong opposition to the proposed thermal facility within the Ecohive complex in Magtab. As an engaged resident, I believe it is unacceptable for our community to become the site of a project that would further jeopardise our environment and air quality, contradicting the original vision for this area as a green space and park. The Magtab waste facility has long been a source of controversy, and we must reevaluate its potential to be transformed into the green space that our community desperately needs. Malta is already grappling with some of the poorest air quality in Europe, and the introduction of a thermal plant,	Refer to response provided to Individual 163.

		along with its related structures and wastewater treatment, would have dire consequences. For the well-being of our residents, I urge you to heed our concerns and take a stand against the proposed thermal facility.	
177.	Individual 177	To Whom It May Concern, I am writing to formally express my strong opposition to the proposed thermal facility within the Ecohive complex in Maghtab. As an engaged resident, I believe it is unacceptable for our community to become the site of a project that would further jeopardise our environment and air quality, contradicting the original vision for this area as a green space and park. The Maghtab waste facility has long been a source of controversy, and we must reevaluate its potential to be transformed into the green space that our community desperately needs. Malta is already grappling with some of the poorest air quality in Europe, and the introduction of a thermal plant, along with its related structures and wastewater treatment, would have dire consequences. For the well-being of our residents, I urge you to heed our concerns and take a stand against the proposed thermal facility.	Refer to response provided to Individual 163.
178.	Individual 178	Dear Sir/Madam, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
179.	Individual 179	To whom it may concern, I refer to the attached public consultation notice that has just come to our attention and that we regretfully were therefore not in a position to attend. As a resident of Gharghur where I reside with my five and 3 young children aged 2, 6 and 8 respectively, we are extremely concerned about potential health hazards of this proposal. As per attached screenshot it can be seen that the facility is located less than 2 Km from our village, and directly in the path of the predominant Majistral wind that will inevitably end up dumping any toxic fumes right on us. Clearly with us being situated on higher ground, the proposed 25 m chimney will make no difference to mitigate the issue and if anything, directing fumes more on our direction. Further to the concerns stated above, in the assessment of the EIA, alternative locations assessed did not analyze alternative locations on the island, despite potential benefits of citing such a facility away from residential areas like Naxxar, Gharghur and Bahar ic-Caghaq which lie in the path of the prevailing NW winds. The alternative location assessment disrespects the spirit of this section of an EIA, whereby it is meant to assess other geographical locations on the island. An omission, which is not justified in anyway, given that the entity is a governmental one with potentially many other optional sites available to assess elsewhere on the island. We strongly urge that a more appropriate site is elected that would not dump toxic fumes on the various villages downwind of the	Refer to response provided to Individual 58.

		facility. Kindly include us as official representees and keep us updated with the application process to be position to submit further representations and appeals as may be necessary. Understandably, should this proposal in any case go through despite the evident health hazards to residents in the area, we will be holding the persons / authorities accountable accordingly. We will certainly not compromise with the health of our children and other residents in the area. Please be guided accordingly.	
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PUBLIC CONSULTATION MEETING

In relation to the Environmental Impact Assessment according to S.L. 549.46

The public is invited to attend a meeting on PA/06096/23 - "Proposed thermal treatment facility in the EcoHive complex, including plant building, storage building, administration building, waste water treatment, tank farm and cisterns"

Case details:

Ref: PA/06096/23 (EA/00020/22)

Site: EcoHive complex, Tul il-kosta, Naxxar.

Meeting details:

Date: 23rd April 2025

Time: 16:00

Meeting type: Hybrid (Online & Physical)

Venue: Salina Resort, Salina Bay, Salina, Naxxar, Malta.

During the meeting a presentation will be given, and the public may request information and clarifications, discuss with the consultants, and comment on the impacts of the proposal or on the assessment itself. **This is part of the consultation process, and is not the final decision-taking meeting.** The Environmental Impact Assessment Report may be viewed online via the link/QR code below or at the ERA offices in Marsa and at the Naxxar Local Council during office hours.

Written submissions labelled "EIA submission on PA/06096/23 (EA/00020/22)," may also be made via email to eia.malta@era.org.mt, or to the EIA Team at Hexagon House, Spencer Hill, Marsa, MRS1441, by the 30th of April 2025.

Registration to the public meeting can be done through the ERA website <https://era.org.mt/era-project/pa-06096-23/> or through the QR code:



Disclaimer: The Authority is committed to protect the personal data and privacy of the public in general. You are being informed that when making submissions, your personal data will not be disclosed or published unless within twelve (12) hours you give consent to the Authority to disclose your personal data. Provided that the Authority may disclose your personal data in those cases where it is required to do so, in order to comply with the applicable Laws.



T. (+356) 2292 3500 W. era.org.mt
Hexagon House, Spencer Hill, Marsa, MRS 1441, Malta

		Places Layers Primary Database Announcements Borders and Labels Places Photos Roads 3D Buildings Weather Gallery More Terrain Ruler Line Path Polygon Circle 3D path 3D polygon Measure the distance between two points on the ground Map Length: 1,803.60 Meters Ground Length: 1,806.96 Heading: 152.33 degrees Mouse Navigation Save Clear 	
180.	Individual 180	I strongly oppose this insane proposal for reasons that should be very obvious to anyone with good intentions	
181.	Individual 181	To whom this may concern, I am writing to express my strong opposition to the proposed installation of waste incinerators in the vicinity of San Pawl tat Targa, where I live with my young children. There is compelling evidence, both internationally and domestically, that incinerators pose serious risks to public health, environmental safety, and the long-term wellbeing of communities. Numerous studies have linked emissions from waste incinerators to increased rates of cancer, respiratory illnesses, cardiovascular disease, and adverse birth outcomes. Children, whose lungs and immune systems are still developing, are particularly vulnerable. Countries such as the Netherlands and Germany, once pioneers in waste incineration, are now moving away from this model, favoring zero-waste policies and more sustainable alternatives like recycling and composting. Even Denmark — a country with one of the highest rates of incineration — has recognized the negative consequences and is actively scaling back incinerator use to meet climate targets. Scientific studies have found that incinerators emit harmful substances, including dioxins, furans, heavy metals, and ultrafine particles, all of which can persist in the environment and accumulate in the human body. The World Health Organization has classified dioxins as a known human carcinogen. Moreover, a 2020 study from the European Environment Agency indicated that communities located near incinerators experience disproportionately higher levels of health problems compared to communities farther away. Beyond the health concerns, incinerators can discourage recycling and waste reduction, locking communities into decades-long	Refer to response provided to Individual 6 regarding air quality concerns, and Individual 31 regarding incineration.

		contracts that are financially and environmentally costly. Once built, these facilities require a continuous stream of waste to remain economically viable, undermining efforts to transition toward a truly circular economy. In light of the overwhelming scientific evidence, global best practices, and the duty of care owed to current and future generations, I urge you to reconsider this proposal and invest instead in cleaner, safer, and more forward-thinking waste management strategies. Thank you for considering my concerns. I trust that the health of our children and the future of our community will be prioritized in your decision-making.	
182.	Individual 182	Good afternoon, Re: the building and operation of an incinerator in Maghtab (or in any area of the Maltese islands for that matter) As a family of four, residing in Triq it-Torri Tal-Kaptan, San Pawl tat-Targa, strongly object to the building and operation of an incinerator. No words of reassurances on the control of any emissions are satisfactory at this point; considering that any previous concerns voiced on any situation have served no purpose. Perfect example of this is the constant daily quarry noise, building shaking and dust; similar verbal assurances were given over decades and decades later, we are all still in the same situation. It is tiring to see a government whose focus is more oriented towards satisfying the demands of developers and businessmen alike, rather than seeing to the well-being and health of the Maltese citizens and residents. An incinerator will have negative long-term effects on the health and well being of the citizens of Naxxar and the entire island. Malta is too small an island with the highest population density in Europe for this to be considered. The Maltese would wish for a peaceful, clean, and enviable island, and not a dirty, dusty and overcrowded island where the air is unbreathable and the Government has to actually incentivise people to drink tap water! Residents and citizens are angry, and are going to prefer upping and establishing their residence elsewhere in the world, other than Malta! What is becoming of this island! What is next!! It is very well known that incinerators are harmful to health, and in both the US and the EU, incinerators are being considered as a very last option; and Malta is considering getting it installed here! For what purpose? To make certain people richer?? At whose expense? The rest of Malta? Why would one not look into the various options available to manage waste prior to taking such a drastic and irreversible decision! How short sighted! Why not improve the system of separation of waste and recycling, for example? Malta is the lowest ranked country in the EU in this regards! Why do we need to go for the extreme option of having an incinerator installed and operated, being an irreversible and harmful option, thereby affecting the health and consequently economic situation of the residents of Naxxar and of the surrounding areas. With the same rate of people establishing their residence in Malta, is going to be the same rate of people wanting to leave this island! Moreover, there appears to have not been any detailed study and impact assessment done taking all waste management measures that will accumulate in this area into consideration – which is the only manner in which the real extent to the impact on our lives may be discovered. Every impact assessment has therefore been watered down to accommodate what seems to be a foregone conclusion that notwithstanding any protests and objections the project will still be carried out! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! We have already experienced the devastating effects of that Marsa power station has had on the lives and health of all the citizens of Malta but most especially those living in the harbour areas. We have also experienced the negative impact of a much smaller incinerator at St.Luke's Hospital on the residents of Msida and others in the vicinity. It would appear that no lessons have been learned, or alternatively, any lessons learned are being overlooked / brushed aside.	Regarding current environmental challenges, refer to response provided to Individual 105 Regarding air quality, kindly refer to the response provided to Individual 6. Regarding sustainable waste management, separation, recycling. kindly refer to the response provided to Individual 6. Regarding cumulative impacts, kindly refer to the response provided to Individual 1.

		The incinerator proposed in Maghtab will have a devastating effect on my health, that of my family, and of all residents on Naxxar and the surrounding areas, which will encompass as much as 18 other local councils - Saint Paul's Bay, Mosta, Gharghur, Lija, Attard, Blazan, Iklin, Birkirkara, San Gwann, Msida, Swieqi, Pembroke, Saint Julinas, Sliema, Gzira, Rabat, Mgarr! And this no matter how well it is presented and notwithstanding the promise of standards maintenance. We thus reiterate that we strongly object to the incinerator, and urge the authorities to consider other means of managing waste.	
183.	Individual 183	As a family of two residing in Gharghur, we are submitting our strong objection to the construction and operation of an incinerator in Maghtab. This objection is especially warranted given that the project is advancing without a comprehensive cumulative impact assessment to quantify its effects on public health and property values. We are not placated by generic assurances regarding emission controls. Our daily exposure to persistent quarry dust—despite decades of similar hollow guarantees—has proven that such words offer no real protection. The introduction of an incinerator will undoubtedly impose long-term harm on the health and wellbeing of residents in Naxxar, Gharghur, and the entire island. Given Malta's limited size and status as the most densely populated country in Europe, any such facility will impact the whole population, regardless of its specific location. It is well-documented that incinerators pose serious health risks. In both the United States and European Union, incineration is considered only as a measure of last resort. Yet in Malta, authorities appear to have bypassed a proper evaluation of alternative waste management solutions, focusing instead on selecting the type of incinerator, rather than questioning whether one should be built at all. Malta ranks among the lowest in the EU for waste separation and recycling—evidence that there are ample opportunities to improve our waste management practices before resorting to such drastic and irreversible measures. Proceeding with an incinerator at this stage is irresponsible and endangers both public health and economic stability for residents of Gharghur, Naxxar, and the surrounding areas. Additionally, there is a glaring absence of a thorough, area-wide impact assessment that accounts for the cumulative effects of existing and planned waste management operations. Only by conducting such a comprehensive study can the full scale of this project's repercussions be understood. The fragmented assessments produced thus far seem deliberately designed to minimize concerns, supporting the perception that this project is being forced through regardless of valid objections. An incinerator presents a severe hazard wherever it is sited on the Maltese islands. The disastrous health impacts of the Marsa power station—especially on harbour area residents—remain a stark example. Likewise, the negative effects of the smaller incinerator at St. Luke's Hospital on the Msida community have not been forgotten. These experiences should have informed future decisions, yet they appear to be dismissed or disregarded entirely. The proposed Maghtab incinerator will pose a significant threat to my health, the health of my family, and the wellbeing of residents in Gharghur, Naxxar, and surrounding localities. No amount of polished presentation or promises of standard adherence can alter this reality. We therefore reaffirm our firm opposition to the construction of this incinerator and call upon the authorities to prioritize alternative waste management methods that do not compromise public health or the environment.	Please refer to the response provided to Individual 105 regarding current environmental challenges, the response to Individual 1 regarding cumulative impacts, and the response to Individual 6 concerning air quality and sustainable waste management.

184.	Individual 184	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
185.	Individual 185	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Bahar Ic Caghaq I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
186.	Individual 186	Dear Sir/Madam Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and/or any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion, one has to assess all the plants in Malta together	Refer to response provided to Individual 1.
187.	Individual 187	Dear Sir/Madam, good morning Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a residents of Naxxar and a members of the Naxxar Neighbours group we hereby declare that we are TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for our decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
188.	Individual 188	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding, as a resident of Madliena I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
189.	Individual 189	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding, as a resident of Madliena I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab.	Refer to response provided to Individual 1.

		The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	
190.	Individual 190	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
191.	Individual 191	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
192.	Individual 192	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
193.	Individual 193	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
194.	Individual 194	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.

195.	Individual 195	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
196.	Individual 196	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA00020/22), as a resident, a local councilor and a member of the Naxxar Neighbours group, I hereby declare that I am totally against the construction of the proposed Thermal Treatment Facility and any other waste incinerator plant at Maghtab. The main reason for my decision is that the impact assessment carried out is useless to the extent that plants are being assessed on individual basis. To come anywhere close to the correct conclusion one has to assess these plants cumulatively , i.e. together.	Refer to response provided to Individual 1.
197.	Individual 197	To whom it might concern, As a resident of Maltai wish to object to an incinerator at Maghtab, especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effect on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust, where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab, where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare.is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
198.	Individual 198	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Swieqi/Madliena/Ibrag I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
199.	Individual 199	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.

200.	Individual 200	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena and a member of the Madliena residents' group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
201.	Individual 201	To whom it might concern, As residents of Malta my family and I wish to object to a waste incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health, property prices and CO2 levels of whole Malta. A check on the negative impact of incinerators throughout the EU proves that such a source of pollution even being considered in any part of Malta is shameful. This will lead to severe health risks not only to the people in the surrounding areas but Malta as a whole as it is such a small island. Please do not put our health and lives at risk.	Refer to response provided to Individual 100.
202.	Individual 202	I am a resident in Salina, Naxxar. I strongly object to the installation of the incinerator so close to my house.	
203.	Individual 203	Dear Sir/Ms. I am writing to strongly object to the proposed construction of the waste incinerator plant within the limits of Naxxar. There is significant concern among residents that, if developed, this plant could severely compromise air quality, with direct and long-term consequences for public health. While the authorities maintain that advanced filtration systems will mitigate such risks, it must be emphasised that no technology is entirely fail-safe. A single malfunction or system failure could adversely affect the health and well-being of those living in the surrounding areas. Given Malta's limited size and high population density, I firmly believe that establishing such a facility in close proximity to residential areas is highly inappropriate and unsafe. I therefore urge the authorities to explore safer and more sustainable alternatives, such as exporting waste for processing abroad or operating such plants on floating platforms or reclaimed land located at a substantial distance from the Maltese coastline. I trust that the authorities will act with foresight and in the best interests of the community by rejecting this proposal and seriously considering more viable and less risky alternatives.	System failures, malfunctions and or exceedances of emission limit values would automatically trigger a shutdown process at the TTF plant. The conditions which are imposed during these emergency procedures will be regulated by the ERA through an IPPC permit that will encapsulates a series of environmental, operational and public health conditions that would need to be maintained. The IPPC permit is also subject to public consultation prior to the operation of the proposed TTF. The operator of the TTF is obliged to follow such permit conditions and may be subject to penalties, permit revocation and legal action, if IPPC permit conditions are not adhered to. Regarding waste export refer to response provided to Individual 157. Regarding TTF on floating platforms / offshore refer to response provided to Individual 131.

204.	Individual 204	I am writing to express my firm opposition to the planned construction of a thermal treatment facility at Mghatab for the incineration of hazardous materials. This proposal raises serious concerns related to public health, environmental degradation, and the long-term well-being of nearby communities and visitors. It is a fact that many countries around the world are actively moving away from such incineration facilities due to the serious health and environmental risks they pose. Emissions from these plants, which include harmful dioxins, heavy metals, and ultrafine particles, have been linked to respiratory illnesses, cancer, and ecological harm. As resident of Naxxar for the last 30 years, I say this from direct experience. When the site was previously used as a landfill, the stench was often unbearable—to the point that many of us were forced to remain indoors. This was not a one-off nuisance but a persistent issue, especially depending on the wind direction, which carried the odor across entire villages. The prospect of once again enduring foul smells and toxic emissions from a hazardous waste incinerator in operation 24/7 is deeply distressing. Let us not forget that residents mainly of Birguma and San Pawl tat-Targa already have to cope with continuous dust emissions from nearby quarry operations, a long term problem with no solution as yet. Beyond air pollution, it will contribute to noise pollution, and all this will definitely affect the value of homes in surrounding areas, diminishing financial investment residents have made in their homes, while posing a general threat to the health and comfort of local families. It also compromises the peace and visual beauty from the area known as “Top of the World,” a cherished open space where residents go to unwind, exercise, and connect with nature. An area that should be protected, not jeopardized. Additionally, Mghatab is in close proximity to Qawra and Bugibba, two very popular tourist destinations. The presence of a hazardous waste facility nearby would negatively affect the image and appeal of these areas, undermining local tourism and business. Visitors come to Malta to enjoy the outdoors and the scenic coastlines—not to be met with the sight, smell, polluted seas or health risks associated with a waste incineration plant. In conclusion, I urge the relevant authorities to reconsider this proposal in light of both the scientific evidence and the lived experience of the local community. There is no justification for placing such a dangerous and disruptive facility in proximity of residential and recreational areas.	Possible odours from the proposed TTF will be contained to indoor areas equipped with advanced odour control systems, including negative pressure ventilation and air curtains. Concerns regarding air quality impacts are explained in further detail in our response to Individual 6. Noise pollution has been modelled and investigated in detail in the EIA. Kindly refer to the noise technical study for further information. The noise impact assessment predicts a minor noise impact from construction and operation.
205.	Individual 205	Dear Sir/Madam I am writing to express my strong objection to the proposed ECO hive in the Maghtab area. This plan raises serious environmental, legal, and public health concerns and appears to conflict with both national obligations and overarching EU legislation. The EU Waste Framework Directive (2008/98/EC) establishes a clear waste hierarchy that prioritizes waste prevention, reuse, and recycling over incineration and disposal. The establishment of multiple incinerators risks locking Malta into outdated and harmful waste management practices, undermining our ability to meet EU circular economy and emissions targets. Maghtab already carries a long-standing environmental burden, and adding further polluting infrastructure in the area would place additional strain on the local ecosystem and residents’ health. There is a legitimate concern that such development could also be in breach of the Ambient Air Quality Directive (2008/50/EC) and Malta’s obligations under the European Green Deal. As an engaged citizen, I urge ERA to reject this proposal and instead focus on sustainable waste management solutions that are in line with EU law, public health standards, and Malta’s environmental commitments. I request that this objection be officially recorded and taken into serious consideration as part of the permitting and public consultation process.	In Malta, the top priorities in waste management continue to focus on sustainable practices aligned with the waste hierarchy, particularly waste prevention and recycling in line with 2008/98/EC – Waste Framework Directive. For a comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations. Kindly refer to the response provided to Individual 31 regarding the waste hierarchy. The EIA has confirmed that the cumulative air quality impacts from the proposed TTF and WtE projects will be below the limits stipulated in the Air Quality Directive (2008/50/EC) which has been transposed to local legislation. Please refer to our response to Individual 6 for further detail.

206.	Individual 206	Dear sir, I would like to register my disagreement to the plan to build an incinerator at Maghtab Naxxar. Besides the continuous humming noise, the foul smell and the hazardous toxins that will be emitted to further contaminate the air we breath there will be a substantial increase in traffic which is already a problem in Naxxar. The Eco hive which is being proposed will consist of not one but four or more incinerators. A Cumulative impact assessment has not been done yet and we as members of residenti naxxarin insist that such an assessment should be done prior to any incinerator being built. Our health and that of the entire Maltese population is at risk!!!	Kindly refer to responses provided to Individual 204 and Individual 1.
207.	Individual 207	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Bahar-ic-Caghaq and a member of the Bahar-ic-Caghaq group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
208.	Individual 208	We are objecting together with many other residents the incendiaries project will be to our homes	
209.	Individual 209	Following the public consultation meeting held on 23rd April 2025 at Salini Resort, I respectfully submit my objection to the proposed thermal treatment facility and any development of a waste incineration plant at Magħtab. As a resident of Naxxar and a member of a community already living close to multiple waste management facilities, I am concerned about the potential cumulative impact of yet another large-scale plant within the ECOHIVE complex. While I understand the need for long-term waste management solutions, the absence of a cumulative environmental impact assessment, which considers the combined effect of all existing and planned operations in the area, is a significant gap in the current planning process and should first be addressed. As highlighted during the consultation, residents are worried about air quality, health risks and the broader environmental and infrastructural strain that may result from concentrating too many waste facilities in one location. The imbalance created by this clustering, especially potentially without proper assessment, raises serious questions about sustainability and fairness in planning. As a parent of young children, I am particularly concerned about how long-term exposure to potential emissions could affect their health and development. The uncertainty surrounding these risks, without a thorough and transparent study, makes it difficult for families like mine to feel secure about the future of our community. I therefore kindly urge the Environment and Resources Authority to pause further progress on this project until a comprehensive cumulative impact study is carried out and made publicly available. Such a step would ensure that decisions are being made based on a complete understanding of the environmental and social context. It would also help foster greater public trust in the process. I also urge the Planning Authority not to assess favourably the proposed thermal treatment Facility in the ECOHIVE Complex, on the basis that impact assessment should not be carried out, and assessed, on an individual basis for it to be a truthful and effective representation of the full proposal. Thank you for considering the concerns of residents directly affected by these developments.	Refer to responses provided to Individual 1 and 6.

210.	Individual 210	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
211.	Individual 211	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants cumulatively" that is together.	Refer to response provided to Individual 1.
212.	Individual 212	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
213.	Individual 213	Jiena [REDACTED] Filwaqt li nifhem il bzonn tal incenatur il gdid, ma nistax nifhem, imma kif dan l incenatur ser jitpogga inqas min 100 metru il boghod mir residennza taghna. Tistaw please tikkunsidraw forsi post iehor fl istess kumpless biex forsi jkun iktar il boghod mir residenza taghna, biex inkunu nistaw ingawdu id dar taghna kif xieraq u bl inqas inkonvenjent, kemm ta storbju, irwejjah, dhahen u trab. Fil Project description statement AIS REF no PRJ-ENV598 Dated 21st Feb 2024, figure 3, page 2, il propjeta taghna tidher cara, fil buffer ta 100 meters.	The TTF will be built within WasteServ's boundaries, which form part of an established Waste Management Development Zone
214.	Individual 214	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

215.	Individual 215	To whom it may concern, Following the meeting of the 23rd April 2025, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab very close to several residential areas in the North and centre of Malta. As a concerned mother of 3 kids with special needs I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore there is no indication of the standards to man and control such a project and how these standards will be strictly enforced and maintained at all times with no hiccups and no room for margin of errors! It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. My objections also stem from the following facts:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta's commitments to environmental sustainability. Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in this day and age! Thank you for your attention to this matter.	Refer to response provided to Individual 109.
216.	Individual 216	Reference to the item in subject, I have the following complaints and suggestions: 1. Ecohive is growing into a large complex which if all projects come into fruition it will be the largest health hazard created and supported by the same authorities that should be protecting its citizens. 2. The government's Vision 2050 emphasises on offshore projects due to the small size of our country. Now if one takes the logic, very logic, step of which projects should be the primary targets for offshore 'housing' it definitely has to be waste disposal because of health issues. 3. I do not buy the 'reassurance' that everything will be monitored to ensure the health of citizens. This is a once-in-a-generation decision and one lack of supervision during the disposal process could result in catastrophic results for people. Is this a risk that should be taken? I urge authorities to reconsider the current plan and to contemplate constructing anything to do with waste disposal offshore, possibly near Hurds Bank where some service for such a project could already be in place. This will eliminate any health risk, which should be the primary aim of every authority on this island. It will also be one less eyesore for all residents and visitors. In view of all the above, I strongly object to the continuation of plans at Ecohive and urge PA and all other authorities involved to seriously consider my proposal which perfectly fits with our government's 'VIZJONI 2050' and that it is a 'Vizjoni li tqis lin-nies bhala nies' and not some waste disposal region.	Please find our replies hereunder: 1. Regarding the assessment of cumulative impacts, please refer to the response provided to Individual 1. For air quality, kindly refer to the response given to Individual 6. 2. Refer to response provided to Individual 131 regarding offshore facility, 3. Refer to response provided to Individual 203 regarding malfunctions and/or abnormal emissions.

217.	Individual 217	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
218.	Individual 218	Dear Sirs/Madams and the Authorities Concerned, As a resident of Naxxar and Malta, we strongly object to the construction and operation of an incinerator in this area — or, indeed, in any part of the Maltese Islands. An incinerator will have serious long-term impacts on the health and well-being of the citizens of Naxxar and the entire island. Malta, with the highest population density in Europe, has no available space where such a large-scale industrial facility could operate without significantly affecting the entire population. It is now well established that incinerators are harmful to public health. In both the United States and the European Union, incineration is increasingly viewed as a measure of last resort. An incinerator should only be considered after all other avenues for waste reduction have been exhausted — and even then, only if it can be sited offshore, away from residential populations. Malta continues to rank low among EU countries in waste separation and recycling rates. There is still significant progress to be made in these areas before considering such a drastic solution. Moreover, the existence of an incinerator would remove incentives for recycling, promoting a culture of convenience at the expense of public health and environmental responsibility. It is evident that decision-makers have only considered which type of incinerator to build, rather than whether such a facility should be built at all. Opting for the "easiest" solution for waste management is, in this case, the wrong solution. Furthermore, no serious cumulative impact assessment appears to have been conducted — one that considers all waste management operations planned for this area in totality. Without such comprehensive evaluation, any impact study remains partial and misleading. We have witnessed the devastating effects of previous industrial operations, such as the Marsa Power Station, which caused lasting harm to the health of residents, particularly in harbour areas. Even smaller incineration facilities, such as the one formerly operating at St. Luke's Hospital, had negative effects on surrounding communities. No matter how advanced the design or how many standards are promised, the risks associated with incineration remain. Past experience has shown that maintaining high operational standards is difficult — especially in critical matters such as public health. There is no room for risk-taking when the health of the nation is at stake. We therefore urge you to halt this project immediately and reassess the proposal in light of the growing body of evidence against incineration. I appeal to the authorities to prioritize safer, more sustainable methods of waste management that truly safeguard the well-being of all Maltese citizens.	Refer to response provided to Individual 183.
219.	Individual 219	Jien kont wiehed minn dawk li attendejt għall Laqgħa tal-ERA, (Laqgħa Publika, laqgħa ta' konsultazzjoni), li saret fi 23 ta' April 2025. Wara din il-Laqgħa jien nixtieq niddikjara li jien ma naqbilx ma dan il-prohett, u li għaliya l-awtoritajiet kompetenti ma humiex qeghdin jagħmlu l-affarijiet kif għandhom ikunu. Dan għaliex l-Environmental Impact Assessment ma għandux isir fuq kull impjant b' mod individwali, imma fuq l-impjati kollha	Refer to response provided to Individual 1.

		flimkien. Anke l "Branding" li qiegħed jingħata bhala ECOHIVE, jurik li dan hu proħett hollistiku. Għallura kif wieħed jista jispjega l-fatt li umbagħad nagħmlu EIA fuq impjant wieħed, meta dejjem qed tenfasizzaw il-fatt li dan sa jkun Proħett Wieħed u hollistikuh	
220.	Individual 220	To whom it may concern, Following the meeting of the 23rd April 2025, I am writing to formally express my strong objection to the proposed incinerator project at Magħtab very close to several residential areas in the North and centre of Malta. As a concerned resident of Naxxar and mother of two children, I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore there is no indication of the standards to man and control such a project and how these standards will be strictly enforced and maintained at all times with no hiccups and no room for margin of errors! It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. My objections also stem from the following facts:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta's commitments to environmental sustainability. Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in this day and age! Thank you for your attention to this matter.	Refer to response provided to Individual 109.

221.	Individual 221	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
222.	Individual 222	Dear Sirs/Madams and the authorities concerned, As a resident of Naxxar and Malta, I strongly object to the building and operation of an incinerator in this area and in any area of the Maltese islands for that matter. An incinerator will have negative long-term effects on the health and wellbeing of the citizens of Naxxar and the entire island. We are a tiny island with the highest population density in Europe. There is nowhere on the island where you can place an industrial monster large enough to handle the waste this island is producing without affecting practically the entire population! It is now very well known that incinerators are harmful to health and in both the US and the EU incinerators are being considered as a very last option. An incinerator should only be considered if it will be sited offshore and only after all other measures are taken to reduce waste. Malta still figures down in the list of EU countries that successfully separate and recycle waste. There is still more to be done before we resort to incinerate waste. An incinerator in fact takes away all motivation to recycle and it will provide an easy way out which is in the long run the most health hazardous option! It seems that the decision makers have only considered which kind of incinerator to build. They seem to have chosen the easy way out to manage waste – which is always the wrong way out! Moreover there has not been any serious study and impact assessment done taking ALL the waste management measures that will accumulate in this area into consideration. Every impact assessment has therefore been watered down to accommodate what seems to be a foregone conclusion that notwithstanding any protests and objections the project will still be carried out! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! We have already experienced the devastating effects of that Marsa power station has had on the lives and health of all the citizens of Malta but most especially those living in the harbour areas. We have also experienced the negative impact of a much smaller incinerator at St.Luke's Hospital on Msida residents and others in the vicinity. The incinerator will have just as devastating an effect on our health no matter how well it is presented and notwithstanding the promise of standards maintenance. We all know from past experience in other areas how difficult it is to maintain standards and how often we failed to do so in matters much less complicated and of much less concern. There is no room for risk taking where national health is concerned! I urge you to halt the project immediately and reassess the proposal in the light of new findings concerning incineration and investigate other safer ways of managing waste.	Refer to response given to Individual 1, 6 & 182.

223.	Individual 223	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval. A very concerned resident,	Refer to response provided to Individual 100.
224.	Individual 224	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval. A very concerned resident,	Refer to response provided to Individual 100.
225.	Individual 225	To whom it may concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval. An extremely concerned resident,	Refer to response provided to Individual 100.

226.	Individual 226	Dear Sir/Madam, Following the ERA meeting held on 23rd April 2025 at the Salini Resort, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. My objection stems from the fact that no cumulative environmental impact assessment has been conducted for the full scope of facilities within the ECO HIVE Complex. Such an assessment is essential to accurately evaluate the overall impact on the environment, public health, and the quality of life of nearby communities. It is highly concerning that this project appears to be advancing despite this significant oversight. Moving forward without a comprehensive evaluation of the combined effects of all operations in the area is not only negligent, but it also places an undue and potentially hazardous burden on local residents. I strongly urge ERA to suspend the project until a full cumulative impact assessment is carried out and made accessible to the public. This is not only a matter of environmental stewardship, but also of public transparency and civic duty.	Refer to response provided to Individual 1.
227.	Individual 227	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
228.	Individual 228	> To whom it may concern, > Following the meeting of the 23rd April 2025, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab very close to several residential areas in the North and centre of Malta. As a concerned resident of Naxxar and mother of two children, I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. > No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore there is no indication of the standards to man and control such a project and how these standards will be strictly enforced and maintained at all times with no hiccups and no room for margin of errors! > It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. > My objections also stem from the following facts:- > Health Risks: > Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. > Environmental Impact:	Refer to response provided to Individual 109.

		> The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta’s commitments to environmental sustainability. > Impact on Future Generations: > The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. > I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in this day and age! > Thank you for your attention to this matter.	
229.	Individual 229	To Whom It May Concern, I am writing as a concerned resident of Naxxar and a member of a family of five to formally object to the proposed Ecohive Thermal Treatment Facility and associated developments at Maghtab. It is unacceptable that a project of this scale is being evaluated through fragmented, individual applications, rather than through a comprehensive Environmental Impact Assessment (EIA) covering the entire Ecohive complex. This piecemeal approach seriously undermines transparency and public trust, and fails to assess the cumulative impact that the waste-to-energy plant, fire station, and other facilities will have on our environment, our health, and our quality of life. The current EIA submitted for the thermal treatment plant is wholly inadequate. Residents — the people who will be most directly affected — are mentioned only four times in the entire document. The report focuses largely on agricultural land and avifauna, while minimising or overlooking the real and lasting risks to human health. We therefore demand: * A full, integrated Environmental Impact Assessment that covers all Ecohive-related projects as a whole, including the fire station and ancillary developments; * A proper, independent Health Impact Assessment (HIA) that specifically addresses the short- and long-term risks of toxic emissions, increased heavy vehicle traffic, noise, and industrial activity on surrounding residential communities; * A serious national commitment to researching and implementing sustainable alternatives to hazardous waste incineration, rather than locking Malta into outdated and risky technologies. We categorically reject any attempt to downplay or dismiss the profound effects that this facility would have not only on residents of Maghtab, Naxxar, and Gharghur, but on Malta as a whole. Our health is not negotiable. We expect better — and we call on the authorities to act responsibly, transparently, and with full respect for the people of Malta. Yours faithfully,	Refer to response provided to Individual 1 regarding cumulative and comprehensive EIAs. Certain waste types such as clinical, abattoir, pharmaceutical, and some industrial wastes cannot be recycled due to sanitary, technical and legal constraints. As presented in the EIA-coordinated assessment report, various treatment technologies were evaluated for different hazardous waste streams currently generated in Malta. Following this evaluation, rotary kiln incineration was identified as the technology capable of safely and effectively treating the full range of these waste streams. For these unavoidable and non-recyclable wastes, the TTF provides a safe, controlled, and legally compliant disposal method, ensuring the protection of human health and the environment. The facility incorporates advanced emissions control technologies and robust odour and environmental impact mitigation measures, including continuous online emissions monitoring in compliance with the Industrial Emissions Directive (2010/75/EU). For air quality and comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6.

230.	Individual 230	Dear Sir/Madam, I am objecting to the outline application for the construction of a Waste to Energy Plant at Maghtab (PA/06096/23 and EA/0002/22). The proposed development contradicts principles of sustainability and environmental preservation. Any Environmental Impact Assessment (EIA) conducted must consider the scenario when the filters fail, as this would severely affect air quality in the surrounding areas. Wasteserv should prioritize further waste reduction and improved recycling solutions instead of constructing an incinerator plant in the northwest region of Malta. According to the attached National Statistics Office document (The Climate of Malta.pdf, page 20), the prevailing wind direction is north westerly. As a result, any emissions from the incinerator, whether filtered or unfiltered, could directly impact the lungs of over half of the Maltese population. Additionally, burning waste will increase carbon dioxide levels in the atmosphere, contributing to global warming and rising sea levels. Incinerating waste is not a viable solution and goes against the United Nations Sustainable Development Goals 11, 12, and 13. We need more innovative solutions to address the increasing waste problem for a sustainable future. Refer to Annex 1 – The Climate of Malta	The EIA considers the abnormal scenario where exceedances of dust emissions may take place within regulatory limits. In cases of malfunction or abnormal conditions, kindly refer to the response provided to Individual 203. In Malta, the top priorities in waste management continue to focus on sustainable practices aligned with the waste hierarchy, particularly waste prevention and recycling in line with 2008/98/EC – Waste Framework Directive. For a comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations. For air quality and comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6. Regarding Prevailing wind patterns, kindly refer to the response provided to Individual 23
231.	Individual 231	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion, one must assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
232.	Individual 232	Dear Sir or Madam, As a resident of Naxxar, I am writing to formally object to the proposed thermal treatment facility (incinerator) at Maghtab. PA/06096/23 (EA/00020/22) I am deeply concerned that this project is moving forward without a comprehensive cumulative impact assessment that properly quantifies the long-term effects on the health and well-being of residents in Naxxar and surrounding localities. Such an assessment is crucial to ensure that all environmental and health risks are transparently evaluated and mitigated before any decision is taken. Scientific studies and real-world experience have clearly shown that incinerators pose significant risks to public health. In both the United States and across the European Union, the development of new incinerators is increasingly seen as a measure of absolute last resort, due to the dangers of air pollution, the release of hazardous substances, and the long-term environmental impact. I urge the both authorities to reconsider this project and prioritize alternative waste management solutions that are safer, more sustainable, and truly aligned with the health interests of our communities and with environmental protection principles. The residents of Naxxar, and all affected localities, deserve full transparency, rigorous scientific evaluation, and the right to live in a	Refer to response provided to Individual 183.

		healthy, safe environment. I respectfully request that my objection be formally recorded and considered.	
233.	Individual 233	Dear Sir/Madam, As residents of Naxxar, I would like to inform you that we are totally against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for our objection is that a cumulative assessment of all the plants has not been carried out. Therefore the full impact on the environment and as a result on our health, is not known. Because of the size of the island, in the long term, this will effect not just the towns and villages in the surrounding area, but also the whole of Malta.	Refer to response provided to Individual 1.
234.	Individual 234	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22) as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Please visit the below links to see what I/we mean. https://chesterpaej.org/house-bill-109-passed-the-committee/ (Cumulative Impact Bill) https://chesterpaej.org/chesters-battle-for-environmental-justice-is-continuing-delco-today-3-18-25/ (General Site) https://chesterpaej.org/why-is-incineration-bad/#:~:text=Incineration%20is%20the%20worst%20way,is%20a%20Zero%20Waste%20plan (Why is incineration toxic)	Refer to response provided to Individual 1.

235.	Individual 235	To the pertinent authorities concerned. We, as residents of San Pawl Tat- Targa, limits of Naxxar, do strongly object to the proposed project of an incinerator being placed anywhere on the island, and in particular in Maghtab. This especially so, without the cumulative impact assessment that such an undertaking requires, and which various world health studies, have proved detrimental to the health and wellbeing of both human beings, and livestock. We have been putting up with the effects of the heavy dust polluted air from the quarries for ages, with asthma and other respiratory diseases on the increase. Having us inhale carcinogenic nanoparticles, which are the toxic by products of waste incineration, certainly is the proverbial final straw. Apart from the fact that Malta is much too small, and too densely populated, it has been proved time and time again that alas, we are not capable of simply managing dust air pollutants from quarries, let alone carcinogenic pollutants from incinerators, even contending with the empty promises and technological speak, we have been subjected to, throughout the years. We therefore reiterate that it is human lives that are at stake here, and human lives take precedence over any cock eyed carcinogen producing project. We are sure that there are other safer ways of disposal and waste management that should be investigated.	Refer to response provided to Individuals 1 and 6.
236.	Individual 236	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as residents of Naxxar and a member of the Naxxar Neighbours group we hereby declare that we are TOTALLY AGAINST the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for our decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
237.	Individual 237	Dear Sir/Madam, I am writing this email to voice my complain and frustration with regards to the new incinerator being proposed at Maghtab. I am a resident of San Pawl tat-Targa and my address is 35, Calfen lodge, Triq Hal-Musulmet, SPTT, Naxxar. The air quality of Naxxar, in recent years has deteriorated due to various construction sites, quarries around Naxxar, the batching plant at Tal-Balal and the increasing traffic we have in Naxxar. Adding an incinerator at Maghtab, will be a serious health hazard, due to its emissions. Not all harmful particles will be captured with filters and those micro or nano particles which escape, will eventually be present in the air we breath. This will further contribute to serious health issues such as cancer etc for us and our children. I am therefore kindly asking you to reconsider this option for Maghtab and its surrounding towns.	Refer to response provided to Individual 6.

238.	Individual 238	Dear Sir/Madam, I am objecting to the outline application for the construction of a Waste to Energy Plant at Maghtab (PA/06096/23 and EA/0002/22). The proposed development contradicts principles of sustainability and environmental preservation. Any Environmental Impact Assessment (EIA) conducted must consider the scenario in which the filters fail, as this would severely affect air quality in the surrounding areas. Wasteserv should prioritize further waste reduction and improved recycling solutions instead of constructing an incinerator plant in the northwest region of Malta. According to the attached National Statistics Office document (The Climate of Malta.pdf, page 20), the prevailing wind direction is northwesterly. As a result, any emissions from the incinerator, whether filtered or unfiltered, could directly impact the lungs of over half of the Maltese population. Additionally, burning waste will increase carbon dioxide levels in the atmosphere, contributing to global warming and rising sea levels. Incinerating waste is not a viable solution and goes against the United Nations Sustainable Development Goals 11, 12, and 13. We need more innovative solutions to address the increasing waste problem for a sustainable future. Refer to Annex 1 – The Climate of Malta	Refer to response provided to Individual 230.
239.	Individual 239	Dear Sir/Madam, Following the ERA meeting of the 23rd April 2025, (EIA Public Hearing for PA/06096/23) I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. As a resident of Naxxar and Malta, I strongly object to the building and operation of an incinerator in this area and in any area of the Maltese islands for that matter. Incinerating waste on a small, densely populated island, can never be an option due to the very severe impact on health caused by the emissions. An incinerator will have negative long term effects on the health and well being of the citizens of Naxxar and the entire island. We are a tiny island with the highest population density in Europe. There is nowhere on the island where you can place an industrial monster large enough to handle the waste this island is producing without affecting practically the entire population! Furthermore, it is deeply concerning that the project appears to be moving forward despite critical gaps in the evaluation of potential impacts. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. ERA has a duty to ban this and other incineration projects. This is a matter of public interest, environmental protection, and basic civic responsibility. An incinerator should only be considered if it will be sited offshore and only after all other measures are taken to reduce waste. Malta still figures down in the list of EU countries that successfully separate and recycle waste. There is still more to be done before we resort to incinerate waste. An incinerator in fact takes away all motivation to recycle and it will provide an easy way out which is in the long run is the most health hazardous option! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! The incinerator will have a devastating effect on our health no matter how well it is presented and notwithstanding the promise of standards maintenance. We all know from past experience in other areas how difficult it is to maintain standards and how often we failed to do so in matters much less complicated and of much less concern.	In Malta, the top priorities in waste management continue to focus on sustainable practices aligned with the waste hierarchy, particularly waste prevention and recycling in line with 2008/98/EC – Waste Framework Directive. For air quality and comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6. For cumulative impact assessment, please refer to the response provided to Individual 1. Regarding offshore facility, kindly refer to refer to response given to Individual 131.

		There is no room for risk taking where national health is concerned! Please halt the project immediately and urge the persons responsible to investigate other, safer ways of managing waste.	
240.	Individual 240	To the Authorities concerned, As a resident of Naxxar and responsible citizen of Malta, I strongly object to the building and operation of an incinerator in this area and in any area of the Maltese islands for that matter. An incinerator will have negative long term effects on the health and well being of the citizens of Naxxar and the entire island. We are a tiny island with the highest population density in Europe. There is nowhere on the island where you can place an industrial monster large enough to handle the waste this island is producing without affecting practically the entire population! It is now very well known that incinerators are harmful to health and in both the US and the EU incinerators are being considered as a very last option. An incinerator should only be considered if it will be sited offshore and only after all other measures are taken to reduce waste. Malta still figures down in the list of EU countries that successfully separate and recycle waste. There is still more to be done before we resort to incinerate waste. An incinerator in fact takes away all motivation to recycle and it will provide an easy way out which is in the long run the most health hazardous option! It seems that the decision makers have only considered which kind of incinerator to build. They seem to have chosen the easy way out to manage waste – which is always the wrong way out! Moreover there has not been any serious study and impact assessment done taking ALL the waste management measures that will accumulate in this area into consideration. Every impact assessment has therefore been watered down to accommodate what seems to be a foregone conclusion that notwithstanding any protests and objections the project will still be carried out! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! We have already experienced the devastating effects of that Marsa power station has had on the lives and health of all the citizens of Malta but most especially those living in the harbour areas. We have also experienced the negative impact of a much smaller incinerator at St.Luke's Hospital on Msida residents and others in the vicinity. The incinerator will have just as devastating an effect on our health no matter how well it is presented and notwithstanding the promise of standards maintenance. We all know from past experience in other areas how difficult it is to maintain standards and how often we failed to do so in matters much less complicated and of much less concern. There is no room for risk taking where national health is concerned! I urge you to halt the project immediately and reassess the proposal in the light of new findings concerning incineration and investigate other safer ways of managing waste.	Refer to response given to Individual 182.

241.	Individual 241	Dear Sirs, I would like to strongly OBJECT to the introduction of this massive equipment which is intended be assembled next to the land fill/hill which is already toxic in itself! This is just like having it in my back yard! Reducing 90% of the waste is one thing. However, generating a health hazard is not only wrong but utterly absurd. Thus, unacceptable. This is a national issue. With Malta's healthy economy, an offshore platform in an out of earshot, out of sight and distantly away to avoid anyone any harm, can happen still within our sea territory. Just because Maghtab has been abused ever since I was born, it does not classify as the ideal location. Bahar ic - Caghaq resident.	Refer to response provided to Individual 6 regarding air quality.
242.	Individual 242	With reference to the maghab incenerator i would like to give my humble opinion which i have managed to follow various scientists that commented on the advantages and disadvantages it carries 1 the incinerator could be a solution from waste to energy so it produce electricity so far so good 2 the disadvantages are of a higher risk to the nearby villages the staff working there the contamination of the soil and its produce the continuous noise and the foul smell and most of all the serious health hazard it caused . so much so the E U stopped funding these projects. I hope the era will consider the above disadvantages for the sake of malta. Thank you for your cooperation from Ivan and Sylvana Formosa	Refer to response provided to Individual 6 regarding air quality.
243.	Individual 243	Dear Sir or Madam, As a resident of Naxxar, I am writing to formally object to the proposed thermal treatment facility (incinerator) at Maghtab. I am deeply concerned that this project is moving forward without a comprehensive cumulative impact assessment that properly quantifies the long-term effects on the health and well-being of residents in Naxxar and surrounding localities. Such an assessment is crucial to ensure that all environmental and health risks are transparently evaluated and mitigated before any decision is taken. Scientific studies and real-world experience have clearly shown that incinerators pose significant risks to public health. In both the United States and across the European Union, the development of new incinerators is increasingly seen as a measure of absolute last resort, due to the dangers of air pollution, the release of hazardous substances, and the long-term environmental impact. I urge the Authority to reconsider this project and prioritize alternative waste management solutions that are safer, more sustainable, and truly aligned with the health interests of our communities and with environmental protection principles. The residents of Naxxar, and all affected localities, deserve full transparency, rigorous scientific evaluation, and the right to live in a healthy, safe environment. I respectfully request that my objection be formally recorded and considered during the review process.	Refer to response provided to Individual 183.

244.	Individual 244	To whom it may concern, Following the meeting of the 23rd April 2025, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab very close to several residential areas in the North and centre of Malta. As a concerned Maltese citizen I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. Three of my children and their families live in Naxxar (Bahar Ic Caghaq). No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore there is no indication of the standards to man and control such a project and how these standards will be strictly enforced and maintained at all times . It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. My objections also stem from the following facts:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta’s commitments to environmental sustainability. Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount ! Thank you for your attention to this matter.	Refer to response provided to Individual 109.
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245.	Individual 245	To whom it may concern, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab very close to several residential areas in the North and centre of Malta. I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore there is no indication of the standards to man and control such a project and how these standards will be strictly enforced and maintained at all times with no hiccups and no room for margin of errors! It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. My objections also stem from the following facts:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta's commitments to environmental sustainability. Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in this day and age! Thank you for your attention to this matter.	Refer to response provided to Individual 109.
246.	Individual 246	To whom it may concern, Following the meeting of the 23rd April 2025, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab very close to several residential areas in the North and centre of Malta. As a concerned resident of Naxxar and mother of two children, I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality	Refer to response provided to Individual 109.

		of life. Furthermore there is no indication of the standards to man and control such a project and how these standards will be strictly enforced and maintained at all times with no hiccups and no room for margin of errors! It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. My objections also stem from the following facts:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta's commitments to environmental sustainability. Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in this day and age! Thank you for your attention to this matter.	
247.	Individual 247	TO WHOM IT MAY CONCERN This is an objection to above: DO NOT AGREE with this project on the basis that a CUMULATIVE ASSESSMENT of all the plants together has not been carried out. This will indicate the real extent of the impact on the environment and thus our LIVES.	Refer to response provided to Individual 1.

248.	Individual 248	To whom it may concern, Following the meeting of the 23rd April 2025, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab very close to several residential areas in the North and centre of Malta. As a concerned resident of Swieqi and mother of two children, I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore there is no indication of the standards to man and control such a project and how these standards will be strictly enforced and maintained at all times with no hiccups and no room for margin of errors! It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. My objections also stem from the following facts:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta's commitments to environmental sustainability. Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in this day and age! Thank you for your attention to this matter.	Refer to response provided to Individual 109.
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249.	Individual 249	To whom it may concern, Following the meeting of the 23rd April 2025, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab very close to several residential areas in the North and centre of Malta. As a concerned resident of Naxxar and mother of two children, I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore there is no indication of the standards to man and control such a project and how these standards will be strictly enforced and maintained at all times with no hiccups and no room for margin of errors! It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. My objections also stem from the following facts:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta's commitments to environmental sustainability. Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in this day and age! Thank you for your attention to this matter.	Refer to response provided to Individual 109.
250.	Individual 250	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in	Refer to response provided to Individual 100.

		any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	
251.	Individual 251	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
252.	Individual 252	Gentleman , kindly take note that the undersigned (a resident of Naxxar) ,is submitting this protest letter with regards to the installation of an incinerator at Maghatab. Me and my family are deeply worried about the installation of this cancer monster machine.	Refer to response given to Individual 6 regarding air quality concerns.
253.	Individual 253	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
254.	Individual 254	To whom it may concern, As a family of four residing in San Pawl tat-Targa, we strongly object to the building and operation of an incinerator in Maghtab (or in any area of the Maltese islands for that matter), particularly when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. An incinerator will have negative long-term effects on the health and well being of the citizens of Naxxar and the entire island. Malta is a small island with the highest population density in Europe. Thus, wherever an incinerator may be placed, it is a near certainty that the entire population will be affected. It is now very well known that incinerators are harmful to health, and in both the US and the EU, incinerators are being considered as a very last option. It would appear that the powers that be in Malta have only considered what kind of incinerator should be selected, as opposed to looking into the various options available to manage waste prior to taking such a drastic and irreversible decision. Malta is among the lowest ranked countries in the EU in terms of separation of waste and recycling, thus there are plenty	Refer to response provided to Individual 182.

		of other options available to improve the situation at hand prior to making a decision that will affect the health (and economic situation) of the residents of Naxxar and surrounding areas. Moreover, there appears to have not been any detailed study and impact assessment done taking all waste management measures that will accumulate in this area into consideration – which is the only manner in which the real extent to the impact on our lives may be discovered. Every impact assessment has therefore been watered down to accommodate what seems to be a foregone conclusion that notwithstanding any protests and objections the project will still be carried out! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! We have already experienced the devastating effects of that Marsa power station has had on the lives and health of all the citizens of Malta but most especially those living in the harbour areas. We have also experienced the negative impact of a much smaller incinerator at St.Luke's Hospital on the residents of Msida and others in the vicinity. It would appear that no lessons have been learned, or alternatively, any lessons learned are being overlooked / brushed aside. The incinerator proposed in Maghtab will have a devastating effect on my health, that of my family, and of all residents on Naxxar and the surrounding areas, no matter how well it is presented and notwithstanding the promise of standards maintenance. We thus reiterate that we strongly object to the incinerator, and urge the authorities to consider other means of managing waste.	
255.	Individual 255	Pls help & send a copy of the draft below - this is an issue that will have a negative health impact on all residents of the Maltese islands. Send to: eia.malta@era.org.mt To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our lives.	Refer to response provided to Individual 100.
256.	Individual 256	To whom it may concern, I refer to the EIA Public Hearing for PA/06096/23 (EA/00020/22) organised on the 23rd April 2025 (https://era.org.mt/eia-public-hearing-registration-for-pa-06096-23-ea-00020-22-online-participation/) in respect of the proposed application regarding the multiple incinerator project in Maghtab. I am writing to formally express my utmost objection to the said application for the proposed incinerator project. My objection is based on the fact that the Authority has failed to carry out a cumulative environmental impact assessment for all the plants in the area known as the ECOHIVE COMPLEX. Without this essential assessment being made public to all the residents of the various surrounding communities, the residents cannot know the true scale and the impact the project will have on the surrounding environment, their health, and their quality of life.	Refer to response provided to Individual 1 regarding cumulative impact assessment. Apart from the studies conducted as part of the Environmental Impact Assessment process, no physical works related to the new TTF project or the publication of the tender have taken place. The only on-site activities have been limited to environmental studies such as air sampling, measurements, topsoil removal for archaeological investigations which are regulatory requirements and form an integral part of the EIA process and have been carried out with the necessary permits.

		As a resident, I am also very concerned that Maltese Authorities are permitting a public consultation process for a substantial EU funded project to be carried in a manner which can only be considered as a ‘white wash’ process considering it is very apparent to all the project decision is a ‘fait accompli’ as major works have already been carried out on site, tenders have been issued and prospective contractors have been identified. As a resident I am also very concerned that the project appears to be moving forward despite this critical evaluation. The decision for the Authority to proceed without properly assessing the combined effects of all the various possible polluting facilities in the area is not only irresponsible but also places undue and potentially dangerous pressure on all the surrounding communities. It is the responsibility of the Authority to stop this project until the required thorough cumulative impact assessment is completed, made publicly available and residents are assured the project will not impact in any manner their environment, their health and their quality of life.	
257.	Individual 257	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
258.	Individual 258	To the pertinent authorities concerned. We, as residents of San Pawl Tat- Targa, limits of Naxxar, do strongly object to the proposed project of an incinerator being placed anywhere on the island, and in particular in Maghtab. This especially so, without the cumulative impact assessment that such an undertaking requires, and which various world health studies, have proved detrimental to the health and wellbeing of both human beings, and livestock. We have been putting up with the effects of the heavy dust polluted air from the quarries for ages, with asthma and other respiratory diseases on the increase. Having us inhale carcinogenic nanoparticles, which are the toxic by products of waste incineration, certainly is the proverbial final straw. Apart from the fact that Malta is much too small, and too densely populated, it has been proved time and time again that alas, we are not capable of simply managing dust air pollutants from quarries, let alone carcinogenic pollutants from incinerators, even contending with the empty promises and technological speak, we have been subjected to, throughout the years. We therefore reiterate that it is human lives that are at stake here, and human lives take precedence over any cock eyed carcinogen producing project. We are sure that there are other safer ways of disposal and waste management that should be investigated.	Refer to response provided to Individual 235.

259.	Individual 259	Dear Sir/Madam, Following the meeting of the 23rd April 2025, (ERA Meeting at Salini hotel) I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. This objection is based on the fact that no cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. Many European countries are moving away from incinerators due to the inevitable health risks concerned. There are countless studies that show that even the most advanced incinerators cause pollutants in the atmosphere – and the proposed one is very intensive and is located very close to residential areas. I urge ERA to halt this project until a thorough cumulative impact assessment is completed and made publicly available. This is a matter of public interest, environmental protection, and basic civic responsibility.	Refer to response provided to Individual 109.
260.	Individual 260	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with my approval .	Refer to response provided to Individual 100.
261.	Individual 261	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
262.	Individual 262	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a	Refer to response provided to Individual 100.

		polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	
263.	Individual 263	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
264.	Individual 264	Has it ever been considered to put this incinerator on the east side of Comino where the winds will carry the pollution away from the islands?	This option has not been considered given that the placement of an industrial plant on a protected Natura 2000 island would lead to significant environmental and legal issues. There would also be significant logistical and economical issues regarding the transportation of waste to the incineration facility on the island.
265.	Individual 265	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
266.	Individual 266	To whom it might concern, As a family of three (including a 6 year old girl) residing at Birguma we wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval. An incinerator should only be considered if it is sited offshore and only after all other measures are taken to reduce waste. Malta still figures down in the list of EU countries that successfully separate and recycle waste. There is still more to be done before we resort	Refer to response provided to Individual 100.

		to incinerate waste. An incinerator in fact takes away all motivation to recycle and it will provide an easy way out which is in the long run the most health hazardous option!	
267.	Individual 267	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
268.	Individual 268	Dear Sir/Madam I am writing to express my strong objection to the proposed ECO hive in the Maghtab area. This plan raises serious environmental, legal, and public health concerns and appears to conflict with both national obligations and overarching EU legislation. The EU Waste Framework Directive (2008/98/EC) establishes a clear waste hierarchy that prioritizes waste prevention, reuse, and recycling over incineration and disposal. The establishment of multiple incinerators risks locking Malta into outdated and harmful waste management practices, undermining our ability to meet EU circular economy and emissions targets. Maghtab already carries a long-standing environmental burden, and adding further polluting infrastructure in the area would place additional strain on the local ecosystem and residents' health. There is a legitimate concern that such development could also be in breach of the Ambient Air Quality Directive (2008/50/EC) and Malta's obligations under the European Green Deal. As an engaged citizen, I urge ERA to reject this proposal and instead focus on sustainable waste management solutions that are in line with EU law, public health standards, and Malta's environmental commitments. I request that this objection be officially recorded and taken into serious consideration as part of the permitting and public consultation process. Yours sincerely,	Refer to response provided to Individual 205.

269.	Individual 269	Dear Sir/Madam, Further to last Wednesday's consultation meeting referenced above, the following are my comments: As a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Please visit the below links to see what I/we mean. https://chesterpaej.org/house-bill-109-passed-the-committee/ (Cumulative Impact Bill) https://chesterpaej.org/chesters-battle-for-environmental-justice-is-continuing-delco-today-3-18-25/ (General Site) https://chesterpaej.org/why-is-incineration-bad/#:~:text=Incineration%20is%20the%20worst%20way,is%20a%20Zero%20Waste%20plan (Why is incineration toxic)	Refer to response provided to Individual 1.
270.	Individual 270	To whom it may concern, Following the meeting of the 23rd April 2025, we are writing to formally express our strong objection to the proposed incinerator project at Maghtab, very proximate to several residential areas in the North and centre of Malta. As concerned residents of San Pawl tat-Targa/Naxxar since 1973, affected by dust and blasting from the quarries nearby, we are now deeply worried about the potential health risks and environmental impacts this facility will pose to our present community and to future generations. No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore, there is no indication of the standards to manage and control such a project, and how these standards will be strictly enforced and maintained at all times. The project seems to be moving forward despite this critical gap in the evaluation process. The decision to proceed without properly assessing the combined effects of all facilities in the area is shameful and poses dangerous pressure on the surrounding communities. Our OBJECTION is based:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta's commitments to environmental sustainability. Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future	Refer to response provided to Individual 109.

		generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. We urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in public administration. Thank you for your attention to this matter.	
271.	Individual 271	To whom it might concern, As a resident of Malta I wish to object to an incinerator at Maghtab especially when this installation is moving forward without a cumulative impact assessment that ultimately quantifies the effects on our health and property prices. We are far from convinced with mere words about reassurances on the control of any emissions, more so when we are plagued with constant daily quarry dust where similar verbal assurances over decades have served no purpose. A check on the impact of incinerators throughout the EU certainly proves that such a source of pollution is even being considered in any part of Malta is shameful even less at Maghtab where years of political incompetence have rendered the area and the adjacent seashore into a polluted nightmare. Is the incinerator to be the cherry on the cake that we and future generations are to suffer for lack of an honest evaluation on its impact on our lives? Certainly not with our approval.	Refer to response provided to Individual 100.
272.	Individual 272	To whom it may concern, We, family Miceli Demajo, as concerned residents of San Pawl tat-Targa, Naxxar, and Malta at large, strongly object to the construction and operation of an incinerator at Maghtab—or in any part of the Maltese Islands. This objection is being made not only on behalf of our own families but in solidarity with the wider community that will be affected by this dangerous and short-sighted project. Malta is a small, densely populated country. There is no part of this island that is far enough away to escape the long-term effects such a facility would have on public health and the environment. The negative impacts of incinerators are well-documented across the EU and the US, where such facilities are considered a last resort after all other waste reduction strategies have been exhausted. Malta, however, still lags behind in basic recycling and waste separation—essential steps that should be the true focus of national policy before even considering incineration. We are particularly alarmed by the absence of a cumulative impact assessment that evaluates the total effect of all the waste management infrastructure concentrated in the Maghtab area. Without this, any environmental or health impact study is incomplete and misleading. Such an oversight undermines public trust, especially when past verbal reassurances about pollution controls—such as those related to quarry dust in our area—have proven worthless in practice. It appears that the authorities have skipped over whether an incinerator should be built and moved straight to how to build it, with no honest evaluation of its true impact. This decision reeks of convenience, not care. The public is being asked to accept another industrial development in an area already plagued by political neglect and environmental degradation. Is this to be the final insult to an already suffering landscape? History has taught us bitter lessons—the Marsa power station and the smaller incinerator at St. Luke’s Hospital had devastating effects on nearby communities. And now we are being asked to risk even greater harm under the guise of modern standards and promises of safe operations. But standards mean nothing if they are not consistently enforced—and Malta has a long record of failing to meet even basic regulatory benchmarks. Additionally, building this incinerator removes the incentive to develop sustainable waste practices. Instead of driving meaningful change, it provides an easy and highly toxic "solution" that could ultimately cause more harm than the problem it claims to address. There is no room for error when it comes to national health. We urge you to halt this project immediately and re-evaluate it in light	Refer to response given to Individual 182.

		of both modern environmental standards and Malta’s urgent need to adopt safer, more sustainable waste management strategies. If an incinerator is ever to be considered, it should only be offshore, and only after every other viable solution has been thoroughly exhausted—and certainly not in a residential area like Maghtab. We reject this project in the strongest possible terms.	
273.	Individual 273	Dear Sir/Madam, Further to last Wednesday’s consultation meeting referenced above, the following are my comments: As a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare, that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER. Please visit the below links to see what I/we mean. https://chesterpaej.org/house-bill-109-passed-the-committee/ (Cumulative Impact Bill) https://chesterpaej.org/chesters-battle-for-environmental-justice-is-continuing-delco-today-3-18-25/ (General Site) https://chesterpaej.org/why-is-incineration-bad/#:~:text=Incineration%20is%20the%20worst%20way,is%20a%20Zero%20Waste%20plan (Why is incineration toxic)	Refer to response provided to Individual 1.
274.	Individual 274	Dear Sirs/Madams and the authorities concerned, As a resident of Naxxar and Malta, I strongly object to the building and operation of an incinerator in this area and in any area of the Maltese islands for that matter. An incinerator will have negative long term effects on the health and well being of the citizens of Naxxar and the entire island. We are a tiny island with the highest population density in Europe. There is nowhere on the island where you can place an industrial monster large enough to handle the waste this island is producing without affecting practically the entire population! It is now very well known that incinerators are harmful to health and in both the US and the EU incinerators are being considered as a very last option. An incinerator should only be considered if it will be sited offshore and only after all other measures are taken to reduce waste. Malta still figures down in the list of EU countries that successfully separate and recycle waste. There is still more to be done before we resort to incinerate waste. An incinerator in fact takes away all motivation to recycle and it will provide an easy way out which is in the long run the most health hazardous option! It seems that the decision makers have only considered which kind of incinerator to build. They seem to have chosen the easy way out to manage waste – which is always the wrong way out!	Refer to response given to Individual 182.

		Moreover there has not been any serious study and impact assessment done taking ALL the waste management measures that will accumulate in this area into consideration. Every impact assessment has therefore been watered down to accommodate what seems to be a foregone conclusion that notwithstanding any protests and objections the project will still be carried out! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! We have already experienced the devastating effects of that Marsa power station has had on the lives and health of all the citizens of Malta but most especially those living in the harbour areas. We have also experienced the negative impact of a much smaller incinerator at St.Luke's Hospital on Msida residents and others in the vicinity. The incinerator will have just as devastating an effect on our health no matter how well it is presented and notwithstanding the promise of standards maintenance. We all know from past experience in other areas how difficult it is to maintain standards and how often we failed to do so in matters much less complicated and of much less concern. There is no room for risk taking where national health is concerned! I urge you to halt the project immediately and reassess the proposal in the light of new findings concerning incineration and investigate other safer ways of managing waste.	
275.	Individual 275	To whom it may concern, Following the meeting of the 23rd April 2025, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab very close to several residential areas in the North and centre of Malta. As a concerned resident of Naxxar and mother of two children, I am deeply worried about the potential health risks and environmental impacts this facility may pose to our present community and to future generations. No cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. Furthermore there is no indication of the standards to manage and control such a project and how these standards will be strictly enforced and maintained at all times with no hiccups and no room for margin of errors! It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible, but also places undue and potentially dangerous pressure on the surrounding communities. My objections also stem from the following facts:- Health Risks: Incinerators are known to emit pollutants such as dioxins, furans, and particulate matter, which can have serious health implications, including respiratory issues, cardiovascular diseases, and increased cancer risks. The proximity of the proposed site to our homes, our towns and villages, our schools, our playgrounds, our recreational outdoor areas and other facilities exacerbates these concerns. Environmental Impact: The location near the sea raises alarms about potential contamination of marine ecosystems, which could affect local fisheries and biodiversity. Additionally, the facility may contribute to air and soil pollution, undermining Malta's commitments to environmental sustainability.	Refer to response provided to Individual 109.

		Impact on Future Generations: The long-term consequences of exposure to pollutants from incinerators can affect not only current residents but also future generations. It is imperative to consider cleaner, more sustainable waste management alternatives that do not compromise public health or the environment. I urge the authorities to reconsider this proposal and explore safer, more environmentally friendly waste management solutions. The well-being of our community and the preservation of our natural resources should be paramount in this day and age! Thank you for your attention to this matter.	
276.	Individual 276	Dear sir, I would like to register my disagreement to the plan to build an incinerator at Maghtab Naxxar. Besides the continuous humming noise, the foul smell and the hazardous toxins that will be emitted to further contaminate the air we breath there will be a substantial increase in traffic which is already a problem in Naxxar. The Eco hive which is being proposed will consist of not one but four or more incinerators. A Cumulative impact assessment has not been done yet and we as members of residentinaxxarin insist that such an assessment should be done prior to any incinerator being built. Our health and that of the entire Maltese population is at risk!!!	Refer to response provided to Individual 206.
277.	Martin Farrugia	Dear Sirs/Madams and the authorities concerned, As a resident of Naxxar and Malta, I strongly object to the building and operation of an incinerator in this area and in any area of the Maltese islands for that matter. An incinerator will have negative long-term effects on the health and wellbeing of the citizens of Naxxar and the entire island. We are a tiny island with the highest population density in Europe. There is nowhere on the island where you can place an industrial monster large enough to handle the waste this island is producing without affecting practically the entire population! It is now very well known that incinerators are harmful to health and in both the US and the EU incinerators are being considered as a very last option. An incinerator should only be considered if it will be sited offshore and only after all other measures are taken to reduce waste. Malta still figures down in the list of EU countries that successfully separate and recycle waste. There is still more to be done before we resort to incinerate waste. An incinerator in fact takes away all motivation to recycle and it will provide an easy way out which is in the long run the most heath hazardous option! It seems that the decision makers have only considered which kind of incinerator to build. They seem to have chosen the easy way out to manage waste – which is always the wrong way out! Moreover there has not been any serious study and impact assessment done taking ALL the waste management measures that will accumulate in this area into consideration. Every impact assessment has therefore been watered down to accommodate what seems to be a foregone conclusion that notwithstanding any protests and objections the project will still be carried out! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! We have already experienced the devastating effects of that Marsa power station has had on the lives and heath of all the citizens of Malta but most especially those living in the harbour areas. We have also experienced the negative impact of a much smaller incinerator at St.Luke's Hospital on Msida residents and others in the vicinity.	Refer to response given to Individual 182.

		The incinerator will have just as devastating an effect on our health no matter how well it is presented and notwithstanding the promise of standards maintenance. We all know from past experience in other areas how difficult it is to maintain standards and how often we failed to do so in matters much less complicated and of much less concern. There is no room for risk taking where national health is concerned! I urge you to halt the project immediately and reassess the proposal in the light of new findings concerning incineration and investigate other safer ways of managing waste.	
278.	Individual 278	Subject: Objection to the Incinerator Project Dear Sir/Madam, I am writing to formally express my opposition to the incinerator project currently being proposed within the ECOHIVE Complex. We are not in agreement with the project moving forward as it stands. It is evident that other important considerations—particularly the cumulative environmental, health, and social impacts—have not been adequately addressed. Decisions of this scale must take into account the long-term effects on surrounding communities and the environment. We believe that proceeding without a comprehensive, transparent review is both premature and unjustified. Alternative solutions and broader consultations should be considered before any further steps are taken. We strongly urge the ERA to reassess the situation and halt any advancement of this project until a full evaluation is completed and publicly reviewed.	Refer to responses provided to Individuals 1 and 6.
279.	Individual 279	Dear Sir/Madam, Reference: Objection to Maghtab Incinerators Project – Lack of Cumulative Environmental Assessment Following the meeting of the 23rd April 2025, (ERA Meeting at the Naxxar Local Council) I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. This objection is based on the fact that no cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible but also places undue and potentially dangerous pressure on the surrounding communities. I urge ERA to halt this project until a thorough cumulative impact assessment is completed and made publicly available. This is a matter of public interest, environmental protection, and basic civic responsibility.	Refer to response provided to Individual 109.

280.	Individual 280	Dear Sir/Madam, Following the meeting of the 23rd April 2025, (ERA Meeting at the Naxxar Local Council) I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. This objection is based on the fact that no cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible but also places undue and potentially dangerous pressure on the surrounding communities. I urge ERA to halt this project until a thorough cumulative impact assessment is completed and made publicly available. This is a matter of public interest, environmental protection, and basic civic responsibility.	Refer to response provided to Individual 109.
281.	Individual 281	Dear Sirs/Madams and the authorities concerned, As a resident of Naxxar and Malta, I strongly object to the building and operation of an incinerator in this area and in any area of the Maltese islands for that matter. An incinerator will have negative long term effects on the health and well being of the citizens of Naxxar and the entire island. We are a tiny island with the highest population density in Europe. There is nowhere on the island where you can place an industrial monster large enough to handle the waste this island is producing without affecting practically the entire population! It is now very well known that incinerators are harmful to health and in both the US and the EU incinerators are being considered as a very last option. An incinerator should only be considered if it will be sited offshore and only after all other measures are taken to reduce waste. Malta still figures down in the list of EU countries that successfully separate and recycle waste. There is still more to be done before we resort to incinerate waste. An incinerator in fact takes away all motivation to recycle and it will provide an easy way out which is in the long run the most health hazardous option! It seems that the decision makers have only considered which kind of incinerator to build. They seem to have chosen the easy way out to manage waste – which is always the wrong way out! Moreover there has not been any serious study and impact assessment done taking ALL the waste management measures that will accumulate in this area into consideration. Every impact assessment has therefore been watered down to accommodate what seems to be a foregone conclusion that notwithstanding any protests and objections the project will still be carried out! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! We have already experienced the devastating effects of that Marsa power station has had on the lives and health of all the citizens of Malta but most especially those living in the harbour areas. We have also experienced the negative impact of a much smaller incinerator at St.Luke's Hospital on Msida residents and others in the vicinity. The incinerator will have just as devastating an effect on our health no matter how well it is presented and notwithstanding the promise of standards maintenance. We all know from past experience in other areas how difficult it is to maintain standards and how often we failed to do so in matters much less complicated and of much less concern. There is no room for risk taking where national health is concerned!	Refer to response given to Individual 182.

		I urge you to halt the project immediately and reassess the proposal in the light of new findings concerning incineration and investigate other safer ways of managing waste.	
282.	Individual 282	Dear Sir/Madam, Reference: Objection to Maghtab Incinerators Project – Lack of Cumulative Environmental Assessment Following the meeting of the 23rd April 2025, (ERA Meeting / Naxxar Local Council) I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. This objection is based on the fact that no cumulative environmental impact assessment has been carried out for all the plants in the area known as the ECOHIVE COMPLEX. Such an assessment is crucial to understand the true scale of the impact on our environment, our health, and our quality of life. It is deeply concerning that the project appears to be moving forward despite this critical gap in evaluation. The decision to proceed without properly assessing the combined effects of all facilities in the area is not only irresponsible but also places undue and potentially dangerous pressure on the surrounding communities. I urge ERA to halt this project until a thorough cumulative impact assessment is completed and made publicly available. This is a matter of public interest, environmental protection, and basic civic responsibility.	Refer to response provided to Individual 109.
283.	Individual 283	Dear Sir/Madam, Following the ERA meeting held on 23rd April 2025 at the Salini Resort, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. My objection stems from the fact that no cumulative environmental impact assessment has been conducted for the full scope of facilities within the ECO HIVE Complex. Such an assessment is essential to accurately evaluate the overall impact on the environment, public health, and the quality of life of nearby communities. It is highly concerning that this project appears to be advancing despite this significant oversight. Moving forward without a comprehensive evaluation of the combined effects of all operations in the area is not only negligent, but it also places an undue and potentially hazardous burden on local residents. I strongly urge ERA to suspend the project until a full cumulative impact assessment is carried out and made accessible to the public. This is not only a matter of environmental stewardship, but also of public transparency and civic duty.	Refer to response provided to Individual 226.

284.	Individual 284	Dear Sir/Madam, Following the ERA meeting held on 23rd April 2025 at the Naxxar Local Council, I am writing to formally express my strong objection to the proposed incinerator project at Maghtab. My objection stems from the absence of a cumulative environmental impact assessment for all the facilities within the ECOHIVE Complex. Such an assessment is essential to fully understand the overall environmental, health, and quality-of-life implications for the surrounding communities. It is deeply concerning that the project appears to be advancing despite this significant oversight. Moving forward without evaluating the combined impact of all existing and proposed developments in the area is both irresponsible and potentially harmful to public well-being. I respectfully urge ERA to suspend the project until a comprehensive cumulative impact assessment is conducted and shared with the public. This is a matter of environmental stewardship, public health, and civic duty.	Refer to response provided to Individual 109.
285.	Individual 285	Dear Sirs/Madams and the authorities concerned, As a resident of Naxxar and Malta, I strongly object to the building and operation of an incinerator in this area and in any area of the Maltese islands for that matter. An incinerator will have negative long term effects on the health and well being of the citizens of Naxxar and the entire island. We are a tiny island with the highest population density in Europe. There is nowhere on the island where you can place an industrial monster large enough to handle the waste this island is producing without affecting practically the entire population! It is now very well known that incinerators are harmful to health and in both the US and the EU incinerators are being considered as a very last option. An incinerator should only be considered if it will be sited offshore and only after all other measures are taken to reduce waste. Malta still figures down in the list of EU countries that successfully separate and recycle waste. There is still more to be done before we resort to incinerate waste. An incinerator in fact takes away all motivation to recycle and it will provide an easy way out which is in the long run the most health hazardous option! It seems that the decision makers have only considered which kind of incinerator to build. They seem to have chosen the easy way out to manage waste – which is always the wrong way out! Moreover there has not been any serious study and impact assessment done taking ALL the waste management measures that will accumulate in this area into consideration. Every impact assessment has therefore been watered down to accommodate what seems to be a foregone conclusion that notwithstanding any protests and objections the project will still be carried out! An incinerator is hazardous wherever you choose to site it on the islands of Malta and it should not be built! We have already experienced the devastating effects of that Marsa power station has had on the lives and health of all the citizens of Malta but most especially those living in the harbour areas. We have also experienced the negative impact of a much smaller incinerator at St.Luke's Hospital on Msida residents and others in the vicinity. The incinerator will have just as devastating an effect on our health no matter how well it is presented and notwithstanding the promise of standards maintenance. We all know from past experience in other areas how difficult it is to maintain standards and how often we failed to do so in matters much less complicated and of much less concern. There is no room for risk taking where national health is concerned!	Refer to response given to Individual 182.

		I urge you to halt the project immediately and reassess the proposal in the light of new findings concerning incineration and investigate other safer ways of managing waste.	
286.	Individual 286	Dear Sir/Madam I write to voice my concern regarding the proposed incinerator/s at Maghtab. Following last Wednesday's meeting many valid points regarding the toxins and hazardous waste generated were explained yet no convincing replies were offered. It transpires that this would be the first of potentially four incinerators planned. Whilst the speakers tried to convince the public that all precautions would be taken past (Marsa & Dockyard) experiences show that somehow operators are allowed to operate without checks and balances. More recently and my (and my neighbours) current experience shows that whilst we commissioned reports which show the level of dangerous dust pollution coming from the nearby quarry ERA have the audacity to claim that the operator is using all mitigating measures to control the dust. Surprisingly ERA rather than commission their own reports accept operator claims and allow the situation to carry on. The proposed incinerator will be another health damaging project which will affect thousands of locals and tourists. I hope common sense will prevail and the project will be scrapped.	The handling of waste generated from incineration is described in the EIA reports (Coordinated Assessment Report). Ash residues will be contained in appropriate enclosed areas within the facility. Regarding air quality kindly refer to response given to Individual 6. Regarding Marsa TTF, the existing facility has reached the end of its operational life and even with major refurbishment, it cannot be upgraded to meet today's technical standards or projected capacity requirements. It is precisely for this reason that the development of a new facility is necessary. The new thermal treatment facility has been specifically designed to meet the highest standards of environmental protection, safety, and public health, using state-of-the-art systems and Best Available Techniques (BAT). Some of major improvements: - Fully enclosed waste storage and handling areas, designed to prevent the release of odours. - Advanced ventilation and odour control systems, which maintain negative pressure in waste handling zones to ensure emissions are effectively captured before release. - A best-in-class flue gas treatment system, incorporating both dry and wet technologies, an advanced configuration - Emissions from the stack will be continuously monitored using a Continuous Emissions Monitoring System (CEMS), which tracks pollutants in real time.
287.	Individual 287	To whom it may concern, I am writing this email regarding the potential of a new incinerator in Maghtab. I want to express that I strongly object to This being done as it will most definitely affect the air quality in the area. I am a doctor and am deeply concerned about the health risks this would pose. This could lead to an increase in cancer rates and also various lung diseases. I hope this does not become the next reality of Malta.	Kindly refer to response provided to Individual 6 regarding air quality concerns.
288.	Individual 288	To whom it may concern, I hope this message finds you well. I am writing to formally express my strong objection to the proposed incinerator project in Naxxar. While I understand the necessity of waste management solutions, I am deeply concerned about the potential health hazards this incinerator could pose to the local community and the environment.	Adequate abatement systems for odour and pollutant control will be in place at the proposed TTF. The operations at the TTF must follow strict IPPC permit conditions issued by the ERA, in line with EU requirements for waste incinerators. The TTF must meet the latest and strictest standards of operation as stipulated by the EU commission for waste incinerators operating in Europe. Kindly refer to response provided to Individual 6 regarding air quality issues.

		Incineration of waste, particularly without adequate safeguards, can release harmful pollutants into the air, which may adversely affect the health of residents, particularly vulnerable groups such as children, the elderly, and individuals with respiratory conditions. The long-term effects of exposure to these emissions are well-documented, including an increased risk of respiratory and cardiovascular diseases, cancer, and other serious health complications. Additionally, I am concerned about the potential for contamination of local water and soil resources due to ash residues and emissions from the incinerator. This could have far-reaching impacts on both human health and the local ecosystem. I urge you to reconsider this project and explore more sustainable and safer waste management alternatives, such as recycling programs, composting, or advanced technologies that minimize environmental and health risks. Engaging with the community to ensure their voices are heard in the decision-making process is also crucial. Thank you for your time and consideration. I trust that you will take these concerns seriously and prioritize the well-being of Naxxar's residents.	Ash residues shall be contained in appropriate enclosed and impermeable areas within the facility. Therefore, the risk of contamination from such residues is negligible.
289.	Individual 289	To whom it may concern, I hope this message finds you well. I am writing to formally express my strong objection to the proposed incinerator project in Naxxar. While I understand the necessity of waste management solutions, I am deeply concerned about the potential health hazards this incinerator could pose to the local community and the environment. Incineration of waste, particularly without adequate safeguards, can release harmful pollutants into the air, which may adversely affect the health of residents, particularly vulnerable groups such as children, the elderly, and individuals with respiratory conditions. The long-term effects of exposure to these emissions are well-documented, including an increased risk of respiratory and cardiovascular diseases, cancer, and other serious health complications. Additionally, I am concerned about the potential for contamination of local water and soil resources due to ash residues and emissions from the incinerator. This could have far-reaching impacts on both human health and the local ecosystem. I urge you to reconsider this project and explore more sustainable and safer waste management alternatives, such as recycling programs, composting, or advanced technologies that minimize environmental and health risks. Engaging with the community to ensure their voices are heard in the decision-making process is also crucial. Thank you for your time and consideration. I trust that you will take these concerns seriously and prioritize the well-being of Naxxar's residents.	Refer to response provided to Individual 288.

290.	Individual 290	Resending with my details, and would also add the probable increase in noise pollution. Address [REDACTED] [REDACTED] Bahar ic-Caghaq I/o Naxxar [REDACTED] [REDACTED] The information in this e-mail and in any attachment may contain information which is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you receive this e-mail in error, please notify me and delete this message. From: [REDACTED] Sent: 24 April 2025 14:13 To: eia.malta@era.org.mt Subject: PA 993/23 Dear Sir / Madam I hereby write to object on the proposed incinerator plant, in Mghatab. * Being too close to residential areas * Increase in traffic, on what are already busy roads in the area * Health Issues	Refer to responses provided to Individual 6 and 204. The visual impact of the proposed TTF has been evaluated in the EIA. Refer to response provided to Individual 37. Regarding dismantling of such plants in Denmark, kindly note that Amager Bakke, a waste-to-energy plant, operates in the city centre of Copenhagen.
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		* Visual impact on the area, this is a coast road, between Sliema / St.Julians and Bugibba/St.Pauls/ Mellieha all popular tourist areas. The claim that such systems are used overseas, does not hold, as the distance to the residential areas is much larger. Other countries, such as Denmark, are dismantling such plants due to health hazards. Would it not be more appropriate if such a plant were to be built in an industrial zone such as Hal Far, or offshore.	
291.	Individual 291	Dear ERA, I am writing to oppose the proposed hazardous waste incinerator in Magtab. The project poses serious risks to public health and the environment, especially given Malta's prevailing winds, which could spread harmful emissions across the island. The EIA underestimates the potential dangers—particularly from ultrafine particles, which are known to be hazardous and are not effectively regulated or monitored. It also fails to assess the cumulative impact of this project alongside others planned within the same area. With many European countries moving away from incineration due to health and operational concerns, Malta should invest in cleaner, future-proof solutions—not outdated and potentially dangerous technology. I strongly urge you to reconsider this development.	Refer to response provided to Individual 6.

292.	Individual 292	Re: PA File No.: PA/06096/23 ERA Reference: EA/00020/22 Project Title: 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 Dear Sirs I am writing to express my strong objection to the above proposed establishment of a thermal treatment facility in close proximity to Bahar ic-Caghaq. As a resident and concerned member of the community, I believe this project poses a serious risk to public health, primarily due to the potential for air pollution and its long-term effects on residents—particularly children, the elderly, and those with pre-existing respiratory conditions. Thermal treatment processes are known to emit harmful pollutants, including particulate matter, volatile organic compounds, and other toxic substances that can significantly degrade air quality. The proximity of such a facility to homes, schools, and recreational areas raises substantial concerns about chronic exposure to these pollutants, which has been linked to increased rates of asthma, cardiovascular diseases, and other serious health conditions. Given the established scientific evidence regarding the health impacts of air pollution, it is both alarming and deeply disappointing that such a facility is being considered so close to where people live and raise their families. The health and well-being of residents should be the foremost priority in any urban or industrial planning decision. I respectfully urge the authorities to reconsider this proposal and explore alternative locations that do not compromise the safety and health of a residential population. Additionally, I request full transparency in the decision-making process and a thorough environmental impact assessment that includes community input. Thank you for your attention to this critical matter. I trust that the concerns of the residents will be taken seriously and that the necessary steps will be taken to ensure our environment and health are protected.	Refer to response provided to Individul 6 regarding air quality concerns.
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293.	Individual 293	Re: PA File No.: PA/06096/23 ERA Reference: EA/00020/22 Project Title: 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 Dear Sirs, I am writing to express my strong objection to the above proposed establishment of a thermal treatment facility in close proximity to Bahar ic-Caghaq. As a resident and concerned member of the community, I believe this project poses a serious risk to public health, primarily due to the potential for air pollution and its long-term effects on residents—particularly children, the elderly, and those with pre-existing respiratory conditions. Thermal treatment processes are known to emit harmful pollutants, including particulate matter, volatile organic compounds, and other toxic substances that can significantly degrade air quality. The proximity of such a facility to homes, schools, and recreational areas raises substantial concerns about chronic exposure to these pollutants, which has been linked to increased rates of asthma, cardiovascular diseases, and other serious health conditions. Given the established scientific evidence regarding the health impacts of air pollution, it is both alarming and deeply disappointing that such a facility is being considered so close to where people live and raise their families. The health and well-being of residents should be the foremost priority in any urban or industrial planning decision. I respectfully urge the authorities to reconsider this proposal and explore alternative locations that do not compromise the safety and health of a residential population. Additionally, I request full transparency in the decision-making process and a thorough environmental impact assessment that includes community input. Thank you for your attention to this critical matter. I trust that the concerns of the residents will be taken seriously and that the necessary steps will be taken to ensure our environment and health are protected.	Refer to response provided to Individual 292.
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294.	Individual 294	As a resident of Bahar-ic-Caghaq, I strongly object to this project on the following grounds: The project has been sold to the general public as a renewable energy initiative that will contribute to the general wellbeing of our nation. This cannot be further from the truth. I invite you to read the article entitled “Exposing the Waste-to-Energy Lie” by Tim Smedley from the New Climate. In this article you will learn that the incineration option creates many more problems than benefits. Denmark embarked on a major incineration strategy some years ago only to find out they are detrimental to public health and are in the process of closing 7 incinerators across the country. Scotland have banned incinerators altogether as they have found that they produce nanoparticles that cannot be filtered causing respiratory and cardiovascular diseases. Incinerators are used to burn the most toxic materials. They pollute more than power stations running on coal and create the same CO2 emissions as landfills. A medium sized incinerator emits as much nitrogen oxides as 10,000 diesel cars travelling at 30mph. It is ironic that we have signed up to reduce microplastics from the seas and then approve a project that will produce it in the air we breathe. The EU Commission issued a recommendation against incinerators, and we are going to invest 600 million euros in this technology. According to a separate study, the plant that is being proposed in Maghtab is far bigger than we need. This will lead to recyclable materials being diverted to incineration making a complete mockery of the much-publicised circular economy! The project will turn a primarily agricultural and residential area into an industrial site without the consent of the people inhabiting the area. The excessive size of the plant means that it will be visible from every angle creating an ugly eyesore that the residents will have to live with every day. The prevailing wind in the Maltese Islands is north westerly. The site chosen for the incinerator means that the emissions will be blown straight into an area inhabited by residents and one of the busiest tourist locations. If such a plant is to be built it must be where the prevailing winds will blow the emissions out to sea. I hope that you will confirm the facts that I have mentioned above and recommend to PA that the development permit is not issued.	The TTF is not being advertised as a renewable energy initiative. The TTF has no capacity to generate electricity from incineration. It is important to note that recyclable waste will neither be processed at the Waste-to-Energy (WtE) facility nor at the new Thermal Treatment Facility (TTF) which is the subject of this Environmental Impact Assessment (EIA). For such waste, existing Material Recovery Facilities (MRF) and Organic Processing Plants (OPP) are already operational. This approach is fully aligned with Wasteserv’s waste management strategy, which prioritizes waste prevention and recycling. Significant investments are currently being made to further upgrade and expand these recycling facilities. Despite these robust waste prevention and recycling measures, a residual waste stream inevitably remains, consisting of both non-hazardous and hazardous non-recyclable waste. - For non-recyclable, non-hazardous residual waste, the Waste-to-Energy (WtE) facility plays a crucial role by diverting waste from landfills, recovering energy in the form of electricity, and enabling the recovery of valuable materials such as metals. This approach is fully consistent with the EU Waste Framework Directive, which identifies landfilling as the least preferred option. The justification for this waste-to-energy facility was comprehensively evaluated in the Environmental Impact Assessment (EIA) submitted prior to the granting of development consent. - Regarding the subject of this EIA, the proposed Thermal Treatment Facility (TTF), certain waste types, such as clinical, abattoir, pharmaceutical and specific industrial wastes, cannot be recycled due to sanitary, technical, and legal constraints. As demonstrated in the EIA-coordinated assessment report, various treatment technologies were evaluated for the hazardous waste streams currently generated in Malta. Following a thorough assessment, rotary kiln incineration was identified as the technology capable of safely and effectively treating this broad range of wastes. For these unavoidable and non-recyclable wastes, the TTF provides a safe, controlled, and legally compliant disposal method, ensuring the protection of human health and the environment. The facility incorporates advanced emissions control technologies in compliance with Best Available Technology (BAT) and the Industrial Emissions Directive (2010/75/EU).
295.	Individual 295	Dear Sir / Madam I hereby write to object on the proposed incinerator plant, in Mgħatab. * Being too close to residential areas * Increase in traffic, on what are already busy roads in the area * Health Issues	Refer to response provided to Individual 290.

		* Visual impact on the area, this is a coast road, between Sliema / St.Julians and Bugibba/St.Pauls/ Mellieha all popular tourist areas. The claim that such systems are used overseas, does not hold, as the distance to the residential areas is much larger. Other countries, such as Denmark, are dismantling such plants due to health hazards. Would it not be more appropriate if such a plant were to be built in an industrial zone such as Hal Far, or offshore.	
296.	Individual 296	Dear ERA Team, I am writing to express my strong opposition to the proposed construction of a hazardous waste incinerator in Maghtab. Building such a facility in this location is, frankly, one of the worst possible decisions. The prevailing northwesterly winds pose a significant risk of spreading pollution across the island, directly impacting some of Malta's most desirable residential areas, including Madliena, San Pawl tat-Tarġa, and Birguma. Furthermore, if there are any future plans for land reclamation in the Qalet Marku area, this project would severely undermine efforts to position it as a premium development zone. Malta already suffers from some of the highest asthma rates globally. Introducing a hazardous waste incinerator would only worsen this critical public health issue and impose a long-term environmental and societal burden. I urge you to reconsider this proposal in favor of cleaner, more forward-thinking waste management solutions. Our communities deserve cleaner air and sustainable planning, not a regressive move in one of our island's most sensitive areas.	Refer to response provided to Individual 6 regarding air quality concerns.

297.	Individual 297	I am writing to strongly object to this fallacy of a project. This country is already on the high risk level of air pollution not to mention other pollution. We are over populated and over polluted. Setting up this plant is a receipe for disaster and will cause havoc with peoples health whether in the short or long term. It will affect the entire country and not just the areas close by we are small and get lots of wind. If the dust from the Sahara has caused so much asthma and chest infections in the last few weeks you can only imagine how this will affect ALL. Please note that- 1. Air Pollution Incinerators release pollutants that can impact air quality, including: • Particulate Matter (PM2.5 and PM10): Tiny particles that can enter deep into the lungs and bloodstream, potentially causing or worsening: • Asthma • Bronchitis • Cardiovascular disease • Premature death in vulnerable populations • Nitrogen Oxides (NOx) and Sulfur Dioxide (SO2): • Can irritate the respiratory system and exacerbate conditions like asthma and chronic bronchitis. • Dioxins and Furans: • Highly toxic, persistent pollutants that can accumulate in the body. • Linked to cancer, reproductive and developmental issues, and immune system damage. • Formed when plastics and other materials are incinerated. • Heavy Metals (e.g., lead, mercury, cadmium): • Can affect the nervous system, especially in children. • Bioaccumulate in the food chain, raising long-term exposure risks. 2. Soil and Water Contamination Ash from incinerators (especially bottom ash and fly ash) may contain hazardous substances. If not properly disposed of, these can: • Contaminate groundwater and surface water • Affect agriculture and enter the food chain	Refer to response provided to Individual 6 regarding air quality concerns. Ash generated from the incineration process will be contained and therefore there is no risk for ground contamination. The material shall be exported.
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		• Pose risks to nearby residents through dermal exposure, inhalation, or ingestion 3. Mental Health and Quality of life • Stress and anxiety due to health fears and environmental degradation • Noise, odor, and visual pollution, affecting overall quality of life 4. Vulnerable Populations Children, the elderly, and people with pre-existing conditions are especially at risk. Long-term exposure, even to low levels of pollutants, can have cumulative health effects. Conclusion While modern incinerators can meet stringent EU and international air quality standards, no system is risk-free. The location (e.g., near residential areas or the sea), maintenance, and regulation of the facility are crucial. Transparent monitoring and community health impact studies should accompany any such project, especially in a small, densely populated country like Malta.	
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298.	Individual 298	Re: PA File No.: PA/06096/23 ERA Reference: EA/00020/22 Project Title: 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 Dear Sirs I am writing to express my strong objection to the above proposed establishment of a thermal treatment facility in close proximity to Bahar ic-Caghaq. As a resident and concerned member of the community, I believe this project poses a serious risk to public health, primarily due to the potential for air pollution and its long-term effects on residents—particularly children, the elderly, and those with pre-existing respiratory conditions. Thermal treatment processes are known to emit harmful pollutants, including particulate matter, volatile organic compounds, and other toxic substances that can significantly degrade air quality. The proximity of such a facility to homes, schools, and recreational areas raises substantial concerns about chronic exposure to these pollutants, which has been linked to increased rates of asthma, cardiovascular diseases, and other serious health conditions. Given the established scientific evidence regarding the health impacts of air pollution, it is both alarming and deeply disappointing that such a facility is being considered so close to where people live and raise their families. The health and well-being of residents should be the foremost priority in any urban or industrial planning decision. I respectfully urge the authorities to reconsider this proposal and explore alternative locations that do not compromise the safety and health of a residential population. Additionally, I request full transparency in the decision-making process and a thorough environmental impact assessment that includes community input. Thank you for your attention to this critical matter. I trust that the concerns of the residents will be taken seriously and that the necessary steps will be taken to ensure our environment and health are protected.	Refer to response provided to Individual 292.
299.	Individual 299	Dear Sirs, I am writing to express my strong opposition to the proposed incinerator project in Maghtab. This facility poses a serious threat to public health, our local environment and the overall quality of life for residents across the island. Scientific studies have shown that incinerators release harmful pollutants all of which are linked to respiratory issues, heart disease and cancer. Locating such a facility near homes is reckless and unacceptable. Moreover, the incinerator would be an undeniable eyesore - damaging the visual character of the area and also potentially affecting property values. I urge you to reject this proposal outright. Our island needs sustainable, forward-thinking solutions to waste management not a toxic facility that puts our well-being at risk.	Refer to response provided to Individual 6 regarding air quality impacts. The visual impact of the proposed TTF has been assessed in the EIA and was also presented during the public hearing.. Refer to response provided to Individual 37.

300.	Individual 300	Reference to the item in subject, I have the following complaints and suggestions: 1. Ecohive is growing into a large complex which if all projects come into fruition it will be the largest health hazard created and supported by the same authorities that should be protecting its citizens. 2. The government's Vision 2050 emphasises on offshore projects due to the small size of our country. Now if one takes the logic, very logic, step of which projects should be the primary targets for offshore 'housing' it definitely has to be waste disposal because of health issues. 3. I do not buy the 'reassurance' that everything will be monitored to ensure the health of citizens. This is a once-in-a-generation decision and one lack of supervision during the disposal process could result in catastrophic results for people. Is this a risk that should be taken? I urge authorities to reconsider the current plan and to contemplate constructing anything to do with waste disposal offshore, possibly near Hurds Bank where some service for such project could already be in place. This will eliminate any health risk, which should be the primary aim of every authority on this island.	Refer to response provided to Individual 216.
301.	Individual 301	Re: PA File No.: PA/06096/23 ERA Reference: EA/00020/22 Project Title: 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 Dear Sirs I am writing to express my strong objection to the above proposed establishment of a thermal treatment facility in close proximity to Bahar ic-Caghaq. As a resident and concerned member of the community, I believe this project poses a serious risk to public health, primarily due to the potential for air pollution and its long-term effects on residents—particularly children, the elderly, and those with pre-existing respiratory conditions. Thermal treatment processes are known to emit harmful pollutants, including particulate matter, volatile organic compounds, and other toxic substances that can significantly degrade air quality. The proximity of such a facility to homes, schools, and recreational areas raises substantial concerns about chronic exposure to these pollutants, which has been linked to increased rates of asthma, cardiovascular diseases, and other serious health conditions. Given the established scientific evidence regarding the health impacts of air pollution, it is both alarming and deeply disappointing that such a facility is being considered so close to where people live and raise their families. The health and well-being of residents should be the foremost priority in any urban or industrial planning decision. I respectfully urge the authorities to reconsider this proposal and explore alternative locations that do not compromise the safety and health of a residential population. Additionally, I request full transparency in the decision-making process and a thorough environmental impact assessment that includes community input. Thank you for your attention to this critical matter. I trust that the concerns of the residents will be taken seriously and that the necessary steps will be taken to ensure our environment and health are protected.	Refer to response provided to Individual 292.

302.	Individual 302	To Whom It May Concern Having attended the recent public consultation meeting on 23rd April at Salini Resort together with my wife, I can only say that we came away more worried than ever! The colourful presentation, which I admit, takes full marks as a marketing strategy, has only served to increase our sense of foreboding a hundredfold. It is evident that the cumulative impact of not one, but a number of incinerators serving different purposes, has not been studied or assessed. This is simply unacceptable, as it is the cumulative and not singular effect that is the actual end result of when the plant eventually goes full blast! We are not professionals in the field but please respect our intelligence. It only takes a few google searches - of legitimate scientific sites - to realise that yesterday's technology regarding Incineration is a no no today. Apart from the quarry dust we have had to put up with for decades, our health is now going to be plagued further. Keep in mind that the ill effects of these plants will manifest itself a decade or two later! What a legacy to leave our kids and grandkids! We therefore strongly and unequivocally object to any incinerator being built or operated in Magtab...or in any other locality for that matter, as we all know that the prevailing winds reach all parts of this miniscule rock we live on. One publication by the New York Department of Environmental Conservation had this to say (relevant data only, being reproduced hereunder) Quote: The state's analysis found that incinerators release mercury, lead, cadmium, CO, NOx and hydrochloric acid at higher rates than coal, though emissions of sulfur dioxide (SO2) were lower than coal. Shockingly, mercury from incineration was found to be emitted at a rate 14 times that of coal. Energy Justice Network 2014 analysis of U.S. EPA data compared 59 trash incinerators to 383 coal power plants and found that, to make the same amount of energy, trash incineration emits 2.5 times as much CO2, three times as much NOx and 70% more SO2 than coal. Using the best available industry-wide EPA data, Energy Justice also found that mercury is emitted by trash incinerators at a rate six times that of coal, and that incinerators release dioxins – the most toxic man-made chemicals known to science – at a rate 28 times that of coal. Unquote We are convinced that with a genuine effort from our Professionals in the field, a solution will definitely be found. The cost, however prohibitive, of an alternative solution can never be a deciding factor when Incinerators have been found to belch out carcinogenic material. It is pertinent to point out that the Philippines has banned Incineration plants completely, whilst on a Regional level, Scotland, Wales, Latvia and Hong Kong are now following suit.	Refer to response provided to Individual 1 regarding cumulative impacts. The incineration technology envisaged within the proposed TTF meets the latest and strictest standards of incinerator designs as required by the EU. The operations of the facility would be strictly regulated by the ERA through the IPPC permitting procedure. These include the installation of mandatory abatement systems, controls of environmental impacts and monitoring of emissions. The permit conditions typically define the operational limits and the conditions which the operator must adhere to. Current environmental challenges stem from historical infrastructural limitations. In response, Malta is undertaking a comprehensive and transformative overhaul of its waste management system, driven by substantial investments. For further details on the national waste management strategy and other ongoing developments aimed at addressing these issues and advancing Malta toward a sustainable circular economy, please refer to the response provided to Individual 6. Modern plants equipped with flue gas treatment systems (activated carbon filters, scrubbers, and baghouse filters) emissions are in align with the Best Available Techniques (BAT) and strict limits. Regarding cumulative assessment and air emissions& environmental health kindly refer to response provided to Individual 6.
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		Maghtab hazardous waste incinerator PA/06096/23 (EA/00020/22) Objections till 30 April	
303.	Individual 303	Dear Sirs, I would like to object to this project as per subject. I have learnt that such machinery is banned as it produces toxic material as you well know. That is; consider yourselves responsible if you kill someone! This will be your doing. I already suffer the unfortunate occasional whiffs of unwanted odors which arrive from an abused landfill over the past years and which you have no control of. Through all the research you have been through you should know well enough that this will transpire into a hazardous effect on the neighbouring communities. Surely there are other solutions. What is the opinion of FAA Malta or are you just bulldozing about the citizens? Sorry. No. This should not be I will not agree for such a project anywhere close to any community!	Please refer to response provided to Individual 6 regarding air quality concerns.
304.	Individual 304	To Whom It May Concern Having attended the recent public consultation meeting on 23rd April at Salini Resort together with my wife, I can only say that we came away more worried than ever! The colourful presentation, which I admit, takes full marks as a marketing strategy, has only served to increase our sense of foreboding a hundredfold. It is evident that the cumulative impact of not one, but a number of incinerators serving different purposes, has not been studied or assessed. This is simply unacceptable, as it is the cumulative and not singular effect that is the actual end result of when the plant eventually goes full blast! We are not professionals in the field but please respect our intelligence. It only takes a few google searches - of legitimate scientific sites - to realise that yesterday's technology regarding Incineration is a no no today. Apart from the quarry dust we have had to put up with for decades, our health is now going to be plagued further. Keep in mind that the ill effects of these plants will manifest itself a decade or two later! What a legacy to leave our kids and grandkids! We therefore strongly and unequivocally object to any incinerator being built or operated in Maghtab...or in any other locality for that matter, as we all know that the prevailing winds reach all parts of this miniscule rock we live on. One publication by the New York Department of Environmental Conservation had this to say (relevant data only, being reproduced hereunder)	Refer to response provided to Individual 302.

		Quote: The state’s analysis found that incinerators release mercury, lead, cadmium, CO, NOx and hydrochloric acid at higher rates than coal, though emissions of sulfur dioxide (SO2) were lower than coal. Shockingly, mercury from incineration was found to be emitted at a rate 14 times that of coal. Energy Justice Network 2014 analysis of U.S. EPA data compared 59 trash incinerators to 383 coal power plants and found that, to make the same amount of energy, trash incineration emits 2.5 times as much CO2, three times as much NOx and 70% more SO2 than coal. Using the best available industry-wide EPA data, Energy Justice also found that mercury is emitted by trash incinerators at a rate six times that of coal, and that incinerators release dioxins – the most toxic man-made chemicals known to science – at a rate 28 times that of coal. Unquote We are convinced that with a genuine effort from our Professionals in the field, a solution will definitely be found. The cost, however prohibitive, of an alternative solution can never be a deciding factor when Incinerators have been found to belch out carcinogenic material. It is pertinent to point out that the Philippines has banned Incineration plants completely, whilst on a Regional level, Scotland, Wales, Latvia and Hong Kong are now following suit.	
305.	Individual 305	Objection to the Proposed Incinerator in Malta To whom it may concern I am writing to formally express my objection to the proposed construction of a waste incinerator in Malta. While I acknowledge the need for sustainable waste management solutions, I believe that incineration poses significant risks to public health, the environment, and Malta’s long-term sustainability goals. Also citing grave public health risks, Malta’s history of EU environmental infringements, and systemic failures in waste management enforcement. Scientific evidence and legal precedents prove that incineration is a dangerous solution for Malta, and the government’s poor compliance record raises serious doubts about its ability to mitigate harm. My objections are based on the following grounds: 1. Environmental & Health Hazards * Incinerators emit toxic pollutants, including dioxins, heavy metals (e.g., mercury, lead), and fine particulate matter (PM2.5), which are linked to respiratory diseases, cancer, and other serious health conditions. * Malta’s high population density means emissions would disproportionately affect nearby communities, exacerbating air quality issues in an already polluted region. * Ash residue from incineration contains hazardous materials, posing risks to soil and water if not properly managed. * Increased cancer risk (World Health Organization, 2012; International Agency for Research on Cancer) * Respiratory and cardiovascular diseases (European Environment Agency, 2020) * Adverse effects on child development (studies linking prenatal exposure to incinerator emissions with birth defects and developmental delays) * A 2019 study by the European Public Health Alliance (EPHA) found that even "state-of-the-art" incinerators release harmful substances, and Malta’s dense population exacerbates exposure risks. Given Malta’s already high air pollution levels, adding an incinerator would further endanger public health	Please find our replies hereunder: 1. Kindly refer to response provided to Individual 6 regarding air quality. 2. Kindly refer to response provided to Individual 31 regarding waste hierarchy. 3. The TTF will comply with BAT for waste incineration in order to be able to operate in Malta. The air dispersion modelling that predicts air quality impacts from incineration has considered the operation of BAT equipped incineration facility. Furthermore, all project specifications clearly define the technical requirements necessary to ensure compliance with these standards. The Thermal Treatment Facility (TTF) is explicitly designed to comply with the Industrial Emissions Directive (2010/75/EU), including all relevant Emission Limit Values (ELVs) and the Best Available Techniques (BAT) as established in the Commission Implementing Decision (EU) 2019/2010 best available techniques (BAT) conclusions, under Directive 2010/75/EU for waste incineration. This commitment is embedded in the technical specifications of the project. The technical specifications include design redundancy, systems to ensure that combustion conditions to control emissions, automatic feeding shutdowns during exceedances. The TTF’s design incorporates flue gas treatment systems capable of achieving ELVs in accordance with Directive 2010/75/EU and BREF. The facility includes BAT-Conformant Technologies: multi-stage flue gas cleaning with: sodium bicarbonate / lime injection, activated carbon injection, baghouse filters, additional layer of cleaning: wet scrubber systems, 7/24 online Continuous emissions monitoring (CEMs)

	2. Contradiction with Waste Hierarchy & Circular Economy * Incineration undermines the EU’s waste hierarchy, which prioritizes reduction, reuse, and recycling over disposal. Burning waste discourages investment in sustainable waste management. Inadequate Waste Hierarchy Compliance (Directive 2008/98/EC) The waste hierarchy (Art. 4) mandates prevention, reuse, and recycling before incineration. Malta recycles only 11% of municipal waste (Eurostat, 2023), yet the incinerator would: * Disincentivize recycling by locking capacity into burning waste. * Undermine Malta’s 2035 recycling targets (65% for municipal waste). 3. Non-Compliance with EU Industrial Emissions Directive (2010/75/EU) The incinerator’s Environmental Impact Assessment (EIA) must demonstrate compliance with: * Best Available Techniques (BAT) for waste incineration (BREF WI Conclusions, 2019), yet Malta’s track record of lax enforcement (e.g., PM10 violations, Case C-320/21) raises doubts about adherence. * Emission Limit Values (ELVs) for dioxins (0.1 ng/m³), heavy metals (e.g., Hg, Pb), and PM2.5. Given Malta’s air quality failures (EEA, 2023), the cumulative impact must be reassessed. 4. Impact on Climate Goals * Incinerators produce significant CO2 emissions, and other greenhouse gas emissions, counteracting Malta’s commitments to the Paris Agreement and EU climate neutrality targets, worsening climate change. * Burning plastic waste (a fossil fuel byproduct) exacerbates greenhouse gas emissions, contrary to Malta’s renewable energy transition. 5. Economic Concerns * Incinerators require long-term contracts and high costs, locking Malta into expensive, outdated technology. * Funds would be better spent on zero-waste initiatives, composting, and improved recycling infrastructure. * Recycling and reuse industries create more jobs than incineration. 6. Malta’s Repeated EU Infringements: A Track Record of Failure * The European Commission has repeatedly sanctioned Malta for breaching EU environmental law, including: A. Air Quality Violations	The facility will operate under permit conditions issued by ERA. Continuous emissions monitoring will be carried out. Results will be reported to the Environmental Regulator. This project reflects a clear departure from past practices through its embedded compliance with EU legal and technical frameworks. 4. Incinerable non-recyclable waste and hazardous waste are currently treated at the Marsa TTF or exported. The Marsa TTF was built around 20 years ago and comprises of older systems and technologies. Recyclable waste streams shall not be accepted or incinerated at the TTF. WSM operates other types of facilities to handle such waste streams, in line with the EU Waste Hierarchy and EU Climate Goals. Proposed TTF is designed to treat certain waste types such as clinical, abattoir, pharmaceutical, and some industrial wastes cannot be recycled due to sanitary, technical and legal constraints. As presented in the EIA-coordinated assessment report, various treatment technologies were evaluated for different hazardous waste streams currently generated in Malta. Following this evaluation, rotary kiln incineration was identified as the technology capable of safely and effectively treating the full range of these waste streams. For these unavoidable and non-recyclable wastes, the TTF provides a safe, controlled, and legally compliant disposal method, ensuring the protection of human health and the environment. The facility incorporates advanced emissions control technologies and robust odour and environmental impact mitigation measures, including continuous online emissions monitoring in compliance with the Industrial Emissions Directive (2010/75/EU). It is important to note that recyclable waste will not be processed at these facilities. For such waste, existing Material Recovery Facilities (MRFs) and Organic Processing Plants (OPPs) are already operational. This approach is fully aligned with Wasteserv Malta’s (WSM) waste management strategy, which prioritizes waste prevention and recycling. Significant investments are currently being made to further upgrade and expand these recycling facilities. The top priorities in waste management continue to focus on sustainable practices aligned with the waste hierarchy, particularly waste prevention and recycling. For a comprehensive overview of sustainable waste management strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations. 5. The TTF represents a cost-effective and future-proof investment. The design is based on long-term durability, operational efficiency. The technical specifications require the use of high-grade corrosion-resistant materials & equipment designed for longevity reducing long-term operational costs. A comprehensive Preventative
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		* Case C-320/21: The EU Court of Justice ruled against Malta in 2022 for systematically exceeding PM10 limits (Directive 2008/50/EC), with "insufficient measures" to protect citizens. * Ongoing non-compliance: Malta still fails PM10 and NO2 targets (EEA, 2023), risking further fines. B. Waste Management Failures * Case C-196/20: EU infringement (2021) over illegal landfills (Maghtab expansion) and failure to meet recycling targets (Directive 2008/98/EC). Malta recycles just 11% of municipal waste (Eurostat, 2023), far below the 2025 target (55%). * Inadequate waste treatment: The Commission has warned Malta over untreated waste dumping (Directive 1999/31/EC), yet enforcement remains weak. Given this record, how can Malta guarantee safe incinerator operation when it consistently fails to enforce basic waste and air quality laws? 7. Better Alternatives Exist * Circular Economy: Malta should focus on reducing, reusing, and recycling waste instead of burning it. * Zero-waste policies: Enforce mandatory recycling/composting (as in Slovenia, which recycles 60%+). * Composting & Biodegradable Waste: Organic waste can be composted instead of incinerated. Anaerobic digestion: A proven, low-emission alternative for organic waste. * Waste-to-Energy Alternatives: If energy recovery is needed, anaerobic digestion or gasification are cleaner options. Conclusion This positions the incinerator as legally reckless, not just environmentally unsound. The Precautionary Principle (EU Treaty Art. 191) obliges Malta to reject incineration while safer options exist. Instead of investing in incineration, Malta should focus on: - Strengthening recycling & composting programs - Enforcing waste reduction policies (e.g., single-use plastic bans) - Investing in innovative waste-to-energy alternatives (e.g., anaerobic digestion) I urge the authorities to reject this proposal and prioritize sustainable, health-conscious waste management solutions. I also demand an independent health reviews, given Malta's conflicts of interest (e.g., WasteServ's role). And	Maintenance Plan is also mandated ensuring sustained operational efficiency. Regarding investments on zero-waste initiatives, composting, and improved recycling, kindly refer to response provided to Individual 6. 6. Kindly refer to response provided to Individual 105 7. Comment on circular economy & alternatives, kindly refer to response provided to Individual 6.
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		* Demonstrate how the incinerator aligns with Circular Economy Action Plan goals, * Release the incinerator’s Health Impact Assessment (HIA) and cumulative risk study * Provide dispersion modeling data proving the incinerator will not worsen air quality. * Disclose the project’s BAT assessment and prove how ELVs will be enforced. Please acknowledge receipt of this objection and inform me of further public consultations.	
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5. Comments received following the public hearing – Late submissions (1st May 2025 – onwards)

		Body	EIA Coordinator Response
1.	Individual 1	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Bahar ic-Caghaq I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1 from the previous table.
2.	Individual 2	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
3.	Individual 3	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Bahar ic- Caghaq I hereby declare that I am totally against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. I have no confidence whatsoever in the impact assessments carried out so far, particularly in the fragmented way that these have been done. To me the current process is nothing but a reverse engineering exercise to justify a pre-determined location for these facilities. If the Authorities are to gain the trust of concerned residents, they should fund a holistic impact assessment that is carried out by independent experts and autonomously managed from start to finish (including its initial terms of reference) by a reputable NGO.	Refer to response provided to Individual 1.
4.	Individual 4	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
5.	Individual 5	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.

6.	Individual 6	Dear Sir/Madam, As a resident of Naxxar, I am writing to formally object to the proposed development of an incinerator at Maghtab. My objection is based on several key concerns, particularly the absence of a comprehensive cumulative impact assessment that objectively evaluates the long-term effects on public health, environmental quality, and property values in the surrounding areas. It is deeply concerning that this project is advancing without clear, independently verified evidence that all potential risks—particularly those related to air emissions and particulate matter—will be effectively controlled. Reassurances without data are insufficient, especially in light of past experiences. Residents in the vicinity of active quarries, for example, continue to endure daily exposure to dust and particulate pollution, despite years of verbal assurances from various authorities. This precedent significantly undermines confidence in similar promises being made regarding the incinerator. Moreover, data and case studies from other EU countries suggest that waste incineration can be a significant source of air pollution, including the release of dioxins, heavy metals, and fine particulates. These emissions are known to have adverse health effects, particularly on vulnerable populations such as children and the elderly. It is therefore essential that a full lifecycle and health impact assessment, aligned with EU environmental standards and public consultation obligations, be conducted and made publicly available before any further steps are taken. The proposed location of the incinerator at Maghtab is particularly problematic. This area has already suffered decades of environmental degradation due to historical mismanagement, illegal dumping, and lack of long-term planning. Adding another major industrial installation—one associated with persistent emissions—would further compound the environmental burden on the region, potentially rendering the area permanently uninhabitable for future generations. It is neither responsible nor acceptable to treat communities in this area as expendable, particularly without transparent justification and meaningful public participation. In light of these concerns, I urge the authorities to halt the project until a thorough and independent impact assessment is completed, in line with the precautionary principle and Malta’s commitments under EU environmental directives. Thank you for considering this objection.	Refer to responses provided to Individuals 1, 6 and 31.
7.	Individual 7	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
8.	Individual 8	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.

9.	Individual 9	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
10.	Individual 10	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
11.	Friends of the Earth	Hello, Attached please find FOEM comments re: proposed hazardous waste incinerator. Thank you, Comments on PA-6096-23 - Hazardous Waste Facility Friends of the Earth Malta generally opposes incineration as a waste solution. However, understanding that this facility is meant to address toxic/hazardous wastes there may be a justifiable need for health and safety reasons, depending on the quantity of such wastes being generated in Malta if the generation is exceeding the capacity of existing infrastructure. The plant is said to be needed to treat fallen animals, butcher shop waste, expired food, pharmaceuticals, clinical waste, manufacturing and industrial waste. However, it is unclear if organic or general municipal waste would also be handled at the facility. Friends of the Earth Malta urges that any organic wastes should be handled by the anaerobic digester or composting systems, and any materials that could be recycled be recycled. As a member of Zero Waste Europe, which provides numerous resources on how to achieve zero waste cities (meaning zero to minimal waste going to landfill or incineration), Friends of the Earth Malta would encourage Wasteserv and the national government to look at best practices taking place abroad and take a holistic approach to the problem. In other words, to focus not only on the treatment of existing waste, but also addressing the sources of the waste to reduce the amount of these hazardous waste categories being produced. For example, while some of these types of waste may be unavoidable given current systems, investigation should be conducted to identify ways for local industries and manufacturing plants to minimize the parts of their production that are resulting in waste that requires treatment. There are experts and/or resources that could be brought to Malta, for example to assist with conducting waste audits to identify efficiencies and decrease waste production. If not, then as the population of Malta grows, then it will necessarily imply waste growth as well, which is in contradiction of EU goals. Many aspects of the existing Long Term Waste Management Plan and Circular Economy Plan should be implemented to address this. The EU has been heading towards the phaseout of incineration for years, with more focus on circular economy systems as an alternative. Construction of one large facility means that in order for the finances to be justified, waste will always have to be produced to feed the machine that has been invested in.	- Organic or general municipal waste will not be treated at the TTF. Such waste will be treated at other facilities operated by WSM within the ECOHIVE complex. The proposed facility is specifically designed to treat hazardous waste that cannot be recovered, reused, or recycled. It is not intended for the treatment of general municipal or organic waste, which is currently managed through the existing anaerobic digestion facility. This facility will continue to operate and is planned to be upgraded through further investment. - The hazardous waste facility is only one part of a broader, long-term integrated waste management strategy where minimizing waste generation is the highest priority. Accordingly, waste reduction and recycling remain the preferred options. For a comprehensive overview of sustainability strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations Regarding distributed smaller facilities, Thermal Treatment Facility requires complex infrastructure and strict regulatory oversight. Replicating essential systems such as electrical substations, cold rooms, water treatment units, tank farms, special infrastructures, laboratories, flue gas cleaning systems, stacks, emission monitoring systems across multiple (smaller) sites would significantly increase the footprint, environmental impact and resource consumption. Given Malta's limited land availability, centralising such a facility ensures optimal land use and minimize environmental footprint. Regarding the capacity, the proposed facility has been carefully sized to meet national waste treatment needs, both current and future, without resulting in overcapacity. Waste generation trends across all

	One possible worthwhile suggestion from the community surrounding Maghtab includes the creation of smaller units located in other appropriate areas of the Maltese islands. This avoids the impacts being faced by only one community but also allows for proper scaling, so as not to invest in an over-capacity sized project. Additionally, at a recent public hearing, the consultant from AIS shared information showing that from this project there would be loss of agricultural land and existing rubble walls, and night lights will impact local birds. Geology, water, and ecology impacts are shown as high impact during operation and initial construction, and 50 local trees will have to be relocated. We are also concerned about air quality and the fact that various hazardous chemicals would be emitted, and adverse PM10 levels may affect a nearby agricultural plot and nearby Natura 2000 sites. In summary, Friends of the Earth Malta urges other alternatives to this project to be considered and that waste prevention measures be put in place prior to arriving at a decision to proceed in such projects.	relevant categories have been thoroughly analysed to inform this approach. Kindly refer to response provided to Individual 6 regarding air quality.
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Annex 1 – The Climate of Malta

**The Climate of Malta:
statistics, trends and analysis
1951-2010**

Charles Galdies

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The Malta Airport MetOffice makes effective use of its observations by monitoring current weather patterns and their rate of change. It also monitors the variability of the local climate, especially on a monthly and annual timescale, so as to build local climate statistics.

The vast increase in the flow of data and data management has become a central issue for the MetOffice in order to make better weather forecasts. As it strives to gather more measurements, the collection and quality control procedures are becoming important components of the whole data management exercise. Increased effort is being devoted to making the most effective use of the available resources of data and to developing new methods to improve the system.

The Malta Airport MetOffice is Malta's Official Weather Service, accredited to the World Meteorological Organisation, and ISO 9001:2008 certified. Constantly updated information direct from seven automatic weather stations around Malta and Gozo, together with information from the Airport weather station, a five-day forecast, a detailed and constantly updated three-day forecast for mariners, the UV index, and Satellite images are available online: www.maltairport.com/weather. A monthly newsletter is also available online.



The National Statistics Office collects data on a wide range of social, economic and environmental topics, in response to local and international obligations. These data are compiled according to the latest European standards and are disseminated by means of news releases and publications both in print and electronic format. Information provided by private individuals and entities is treated as strictly confidential, and is only used for the compilation of statistical reports in aggregated format.

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Foreword

Statistics are evolving into a vital tool of modern professional, political and business practice. In order to keep abreast of these developments, the National Statistics Office (NSO) is investing its resources in the coverage of several aspects of Maltese life that complement its activities in traditional statistical domains. It is in this context that the NSO is issuing a publication on climate statistics which should not only be useful for observers of climate change, but also interesting to the general public.

The scope of this publication is twofold: to describe the observed climatological data and to make inferences from the data that may assist users of these data. Ranging from ambient air temperature and precipitation, to atmospheric pressure and relative humidity, the statistics found in this publication afford a glimpse of how this Central Mediterranean island's climate has changed in the recent past.

It is evident that Malta's climate is affected by its geographical location and its size. Both Sicily and the Tunisian peninsula, together with prevailing winds, come into play in the Central Mediterranean region. The surrounding sea also has a seasonal warming or cooling influence. The first part of this publication focuses on Malta's climate within this geographical context.

The second part deals with Malta's climate anomaly trends and possibly related socio-economic impacts. This analysis compares the weather patterns observed during the period 1951-2010 with Malta's standard climate and indicates areas where the correlation is strong or weak.

This publication should also be seen in the context of the broader Europe 2020 strategy on combating climate change within and outside the EU, by having the right statistics at hand to be able to measure the effectiveness of climate change policies and strategies.

I would like to thank Dr Charles Galdies from the Malta Airport MetOffice for this research, together with George Said, Jeffrey Galea and Elizabeth Pizzuto from the NSO for their time and effort.

Michael Pace Ross
Director General

September 2011

1

**Malta's climate within
a geographical context**

1.0 MALTA'S CLIMATE WITHIN A GEOGRAPHICAL CONTEXT

Malta's climate can be described in the context of the topography of the Mediterranean basin where the flow of the lower atmosphere into the basin occurs mainly through mountain gaps, except over the southern shores east of Tunisia.

The seasonal features of the Mediterranean can be traced from the motion and development of the pressure systems over the Atlantic, Eurasia and Africa. While the Mediterranean spring is often a period of indecisive weather, summer is characterised by the intensification of the Azores High which tends to stably extend up to the Central Mediterranean, giving general weather conditions consisting of light surface winds ranging from the northwest to northeast. Autumn is relatively short and leads to wintry conditions in a fairly decisive and quick way. During this season Atlantic depressions move eastwards across northern Europe into the Mediterranean bringing with them waves of cold air. In its path, this cold air comes into contact with warm moist air causing vertical instability, the development of vigorous depressions, rainfall and frequent gales. From time to time the eastward march of travelling depressions is interrupted by cold air coming from the Arctic via the Norwegian Sea or Russia. This great thermal contrast leads to very active depressions.

In the Central Mediterranean region both Sicily and the Tunisian peninsula may play an important part on the local weather. Under certain prevailing conditions Sicily can act as a barrier against strong low-level northerly winds. This Italian island can also create local instabilities due to land heating effects or *heat lows* which may be advected towards the Maltese Islands depending on the prevailing winds.

Transient North African low pressure systems have the potential to produce strong winds over the Central Mediterranean. When for example North African lows occur south of the Atlas Mountains, strong easterly to southeasterly winds are likely over the Central Mediterranean resulting in high seas.

The presence of the surrounding water mass shapes significantly the climate of the Maltese Islands. The general weather is often cooler and more humid than what is experienced in inland areas of larger land masses. The high thermal capacity of the sea also reduces large fluctuations in the ambient temperature of the islands. But the presence of surrounding warm waters during the end of the summer season is a source of major weather instability when colder air migrates into the Central Mediterranean, thus creating areas with heavy thunderstorms and intense precipitation.

Advances of continental tropical air into the Central Mediterranean after a cold spell can give rise to active warm fronts, sometimes producing very active cumulonimbus clouds, copious rainfall and thunderstorm over the Maltese Islands. A period of *sirocco* in the Central Mediterranean, sometimes lasting for many days, often follows the first autumnal invasion of cold air.

2.0 MALTA'S CLIMATE NORM

The description that follows is based on the long-term averages of a number of climatic parameters that have been continuously observed at Luqa Airport by the Malta Airport MetOffice (Galdies, 2010). In view of the lengthy time series during which observations were made from this site, Luqa Airport has long been defined as the reference point for Malta's climatological data (Station number 16597).

According to the World Meteorological Organisation (WMO), climate variables must be processed over agreed uniform periods so as to ensure comparability between data collected at weather stations all over the world as well as to provide a long-term reference value or "normal" with which shorter-term (e.g. monthly weather statistics) data can be compared. For a selected number of their climate stations, WMO Member States prepare climatological normals according to the technical regulations issued by WMO, i.e. as period averages computed for a uniform and relatively long period comprising at least three consecutive ten-year periods (Folland *et al.*, 1990). The standard climate normals used by this document are based on the period 1961-1990 and are Malta's official reference standard climate norm.

The following climate variables are presented in this publication:

- ambient air temperature;
- precipitation;
- atmospheric pressure;
- relative humidity;
- thunder and hail;
- fog events;
- cloud cover;
- duration of bright sunshine;
- winds and gales.

A detailed explanation of each of these variables is beyond the scope of this document and readers are encouraged to refer to general meteorology sources of information.

2.1 Ambient air temperature

The climate normals related to temperature are based on the following weather variables: (1) the daily mean temperature, (2) the daily maximum temperature, (3) the night minimum temperature, and (4) the grass-height minimum temperature.

At Luqa Airport standardised instrumentation used to measure the air temperature has changed with time, ranging from dedicated thermometers for the measurement of the maximum and minimum air temperatures housed in appropriate screens, to calibrated shielded thermocouples mounted on masts at standard height.

Table 1 shows a summary of statistics for the climatic mean temperature. Between the period 1961-1990, the average annual temperature was 18.6 °C and varied from 17.9 °C to 19.7 °C. Figure 1 shows a plot of the monthly means during this same period with the temperature ranging from 12.4 °C (during the winter period) to 26.3 °C (during the summer period).

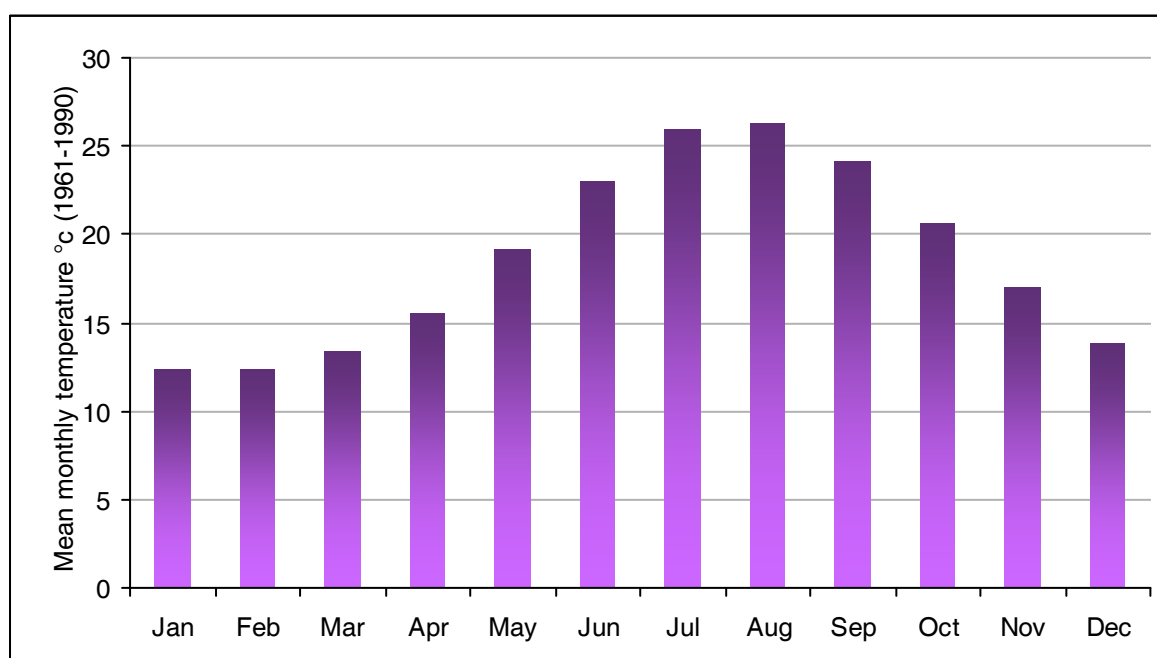
Table 1. Summary of statistics for the mean temperature (°C)
(Based on the 30-year climate period 1961-1990)

Count	30 years (1961-1990)
Average	18.62
Standard deviation	0.40
Coefficient of variation (%)	2.14
Minimum	17.9
Maximum	19.7
Range	1.8
Standard skewness	1.59

Data collected by the Malta Airport MetOffice

The overall variation in temperature is to a large extent due to the regional weather patterns in the Central Mediterranean, and the influence from the surrounding sea, which has a warming influence in winter and a cooling influence during the summer period.

Figure 1. Mean monthly temperature
(Based on the 30-year climate period 1961-1990)

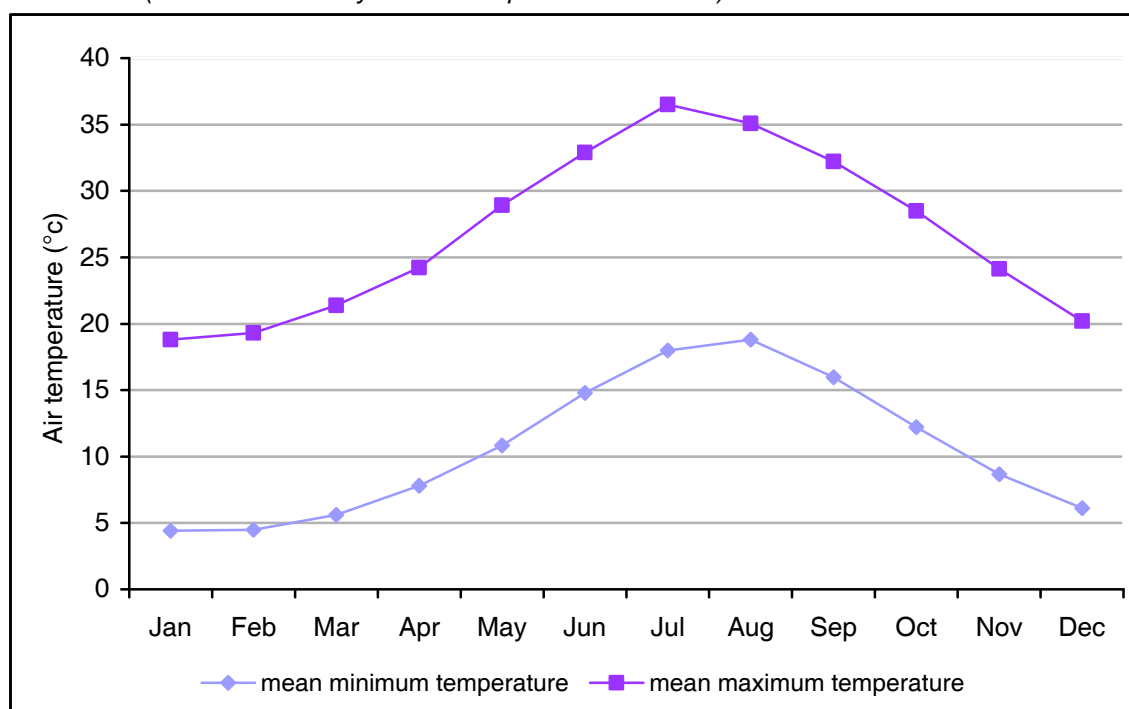


Data collected by the Malta Airport MetOffice

Figure 2 shows the monthly variation of the average minimum and maximum air temperature, while tables 2 and 3 provide information on the monthly mean maximum and

minimum temperatures, together with the value and year of occurrence of temperature extremes for the period 1947-2010. Table 2 shows that while July has the highest mean maximum temperature, the highest extreme temperature was reached on 9 August 1999 when the mercury soared to 43.8°C, making this the hottest day recorded in Malta since 1947. Table 3 indicates that on average the lowest winter temperatures occur in February. However, the lowest ever recorded temperature occurred on 29 January 1981 when the minimum temperature fell to 1.4 °C.

Figure 2. Mean minimum and maximum air temperature
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

Table 2. Mean maximum, extreme maximum temperature, and occurrence during the period 1947-2010

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Mean maximum temperature (°C)	18.72	19.40	21.97	24.67	29.31	33.59	36.38	35.77	32.39	28.64	24.39	20.42
Highest maximum temperature (°C)	22.2	26.7	33.5	30.7	35.3	40.1	42.7	43.8	37.4	34.5	28.2	24.3
Year of highest maximum temperature	1982	1960	2001	1985	2006	1997	1988	1999	1990	1999	1998	1963

Data collected by the Malta Airport MetOffice

Table 3. Mean lowest, extreme minimum temperature, and occurrence during the period 1947-2010

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Mean minimum temperature (°C)	4.96	4.80	5.89	7.91	11.26	15.19	18.45	19.22	16.53	12.89	9.02	6.48
Lowest minimum temperature (°C)	1.4	1.7	2.2	4.4	8.0	12.6	15.5	15.9	13.2	8.0	5.0	3.6
Year of lowest minimum temperature	1981	1956	1949	1956	1970	1975	1980	1972	1969	1978	1995	1967

Data collected by the Malta Airport MetOffice

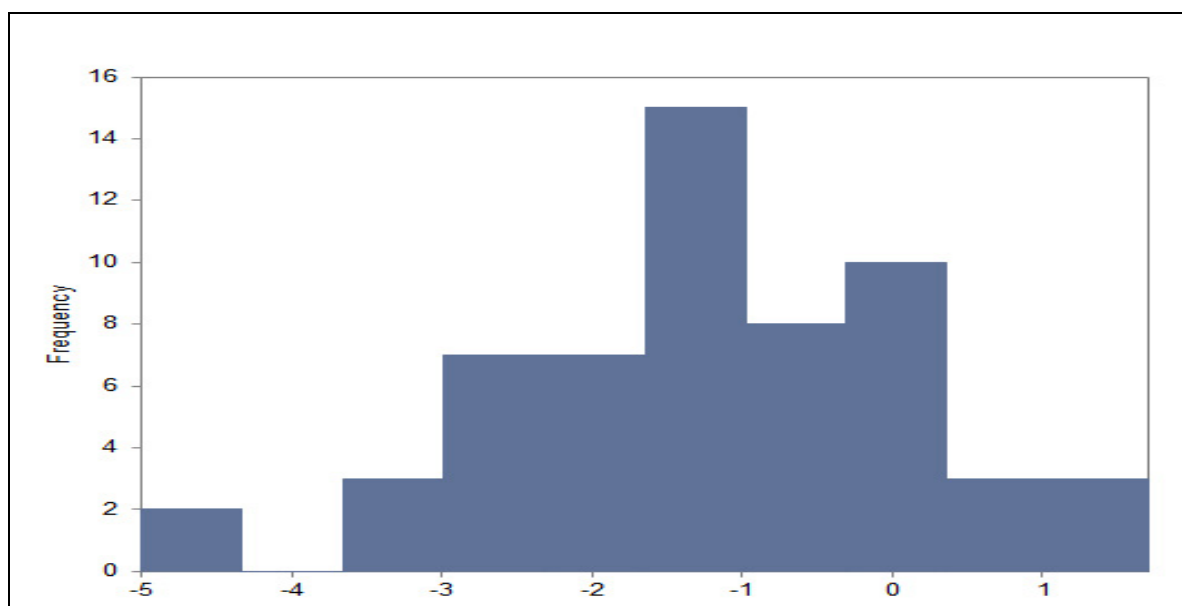
The grass-height minimum temperature is another variable that has been recorded by the Malta Airport MetOffice since 1953. The mean monthly temperature at grass-height follows the same pattern as the minimum air temperature. Table 4 shows that since 1953 the lowest mean grass-height temperature has been recorded during the months of January and February. During the period 1953-2010 the lowest minimum grass-height temperature was recorded on 4 February 1983 when the temperature dropped to -5.1 °C. Data collected since 1953 show that the average lowest grass temperature is -1.3 °C with a standard deviation of 1.4 °C. Freezing temperatures of around -1.3 °C constitute the highest frequency during the period 1955-2010 (figure 3).

Table 4. Mean lowest grass-height minimum temperature, extreme minimum, and occurrence during the period 1953-2010

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Mean minimum grass temperature (°C)	-0.1	-0.1	0.9	3.1	6.3	10.3	13.8	15.0	12.8	8.9	4.5	1.7
Lowest minimum grass temperature (°C)	-5.0	-5.1	-3.6	-0.5	2.0	6.1	10.0	10.9	7.3	3.0	-0.6	-3.0
Year of lowest minimum grass temperature	1966	1983	1982	1965	1970	1978	1970 and 1982	1968	1979	1978	1955	1967

Data collected by the Malta Airport MetOffice

Figure 3. Histogram for the most frequent lowest minimum grass temperature ranges
(Based on the period 1953-2010)



Data collected by the Malta Airport MetOffice

2.2 Precipitation

The most common forms of local precipitation include rain, hail, dew and soft rime. Meteorological observations for rain and dew are made by means of calibrated standard rain gauges that measure precipitation at regular intervals. This technique assumes that the amount of precipitation collected per unit area of the gauge's aperture is the same as the amount falling on the surrounding surface per unit area. Since 1947 these rain gauges have been and are still situated at Luqa Airport. Currently, rain gauges with tipping-buckets connected to electronic sensors are used by the MetOffice.

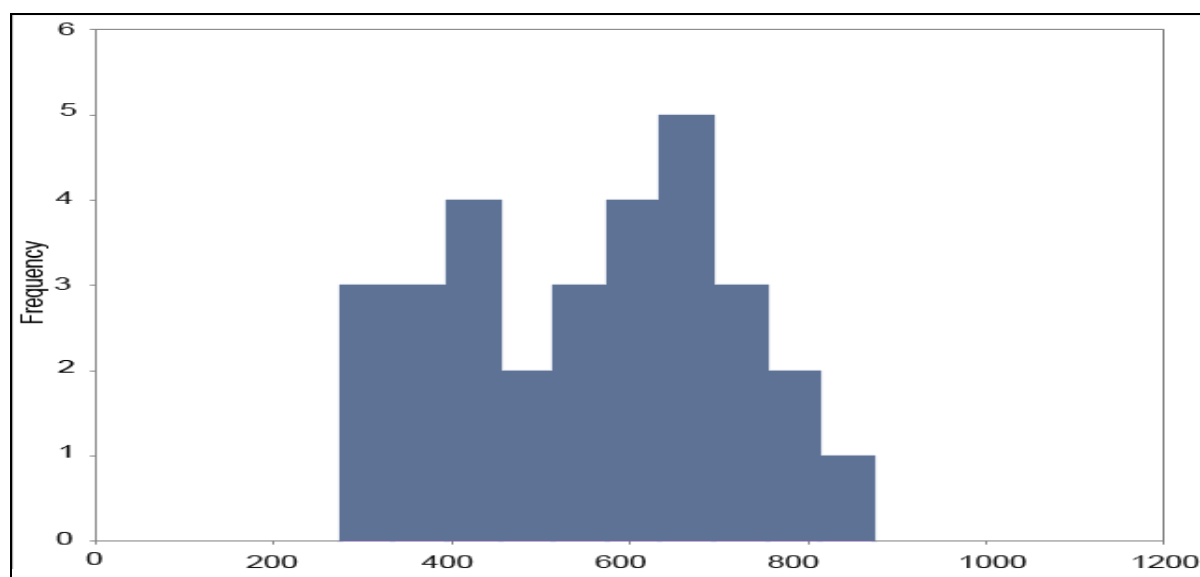
Measurements made during the 30-year climate period 1961-1990 show that the average total precipitation of the Maltese Islands is 553.12 mm with a standard deviation of 156.99 mm (table 5).

Table 5. Summary of statistics for precipitation
(Based on the 30-year climate period 1961-1990)

Count	30 years (1961-1990)
Average	553.12
Standard deviation	156.99
Coefficient of variation (%)	28.38
Minimum	274.22
Maximum	874.10
Range	599.88
Standard skewness	-0.018

Figure 4 shows the frequency of the total annual precipitation during the 30-year period of 1961-1990. It shows a main distribution of precipitation lying within the 400-800 mm range. During this period, the least amount of total precipitation recorded was 274.22 mm (measured in 1961) while the highest total rainfall was 874.1 mm (measured in 1976).

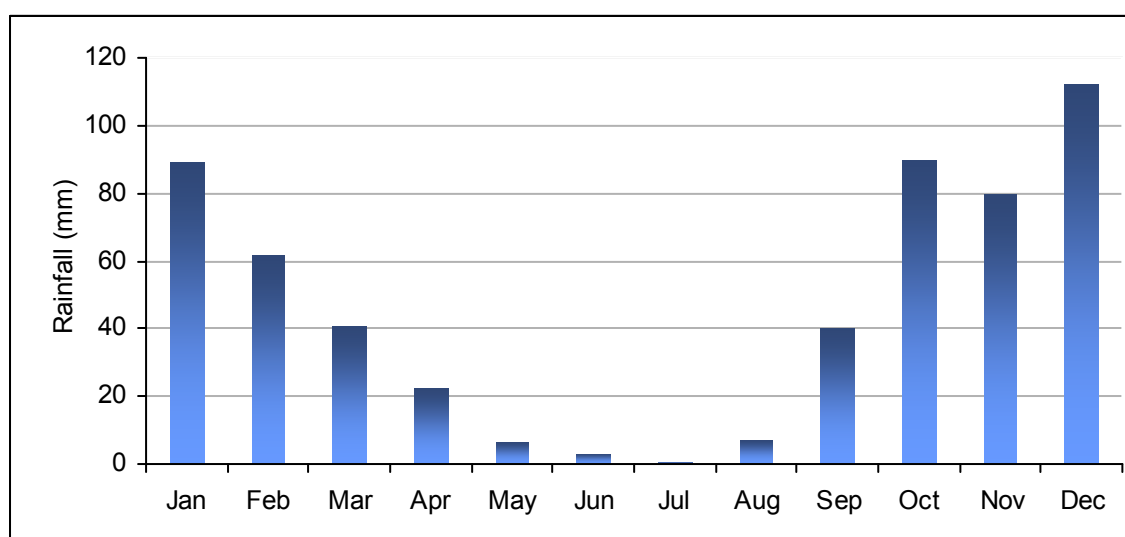
Figure 4. Histogram for the frequency of the total annual precipitation
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

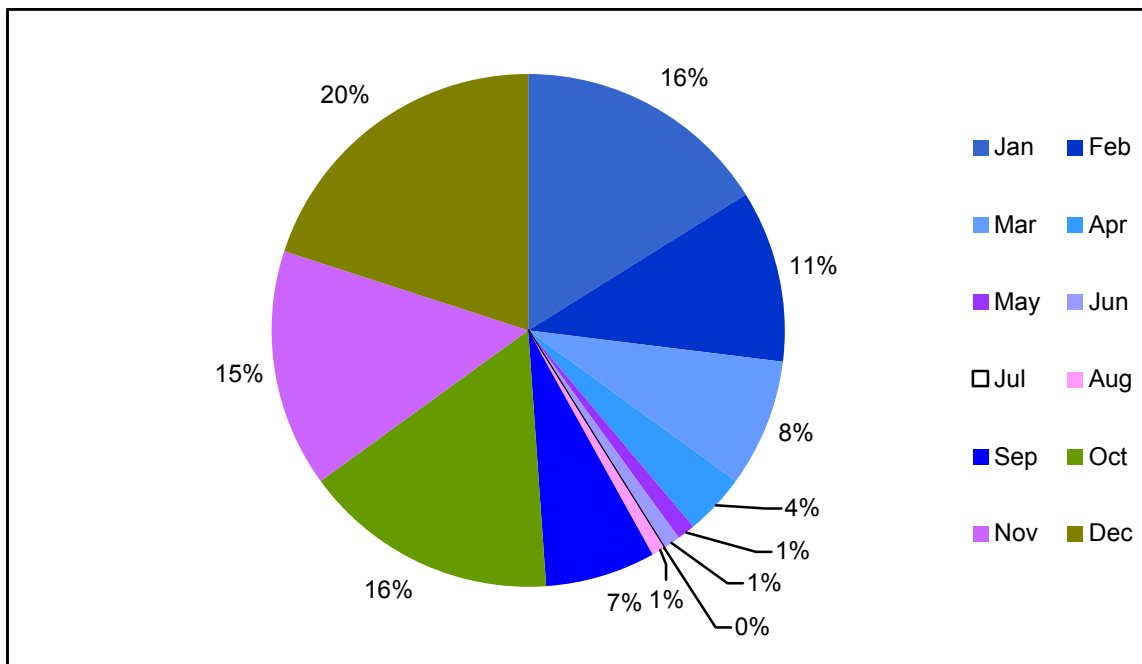
With regard to the periodicity of the monthly precipitation, observations show that the annual pattern of rainy winters is followed by dry and generally rainless summers. Shown in figure 5a and 5b, the month with the highest precipitation is December, amounting to 20.3 per cent of the total annual precipitation. The summer period between June and August barely comprises 2 per cent of the total rainfall. Conversely, over half the total annual precipitation has been recorded between October and December.

Figure 5a. Monthly periodicity of the total annual precipitation
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

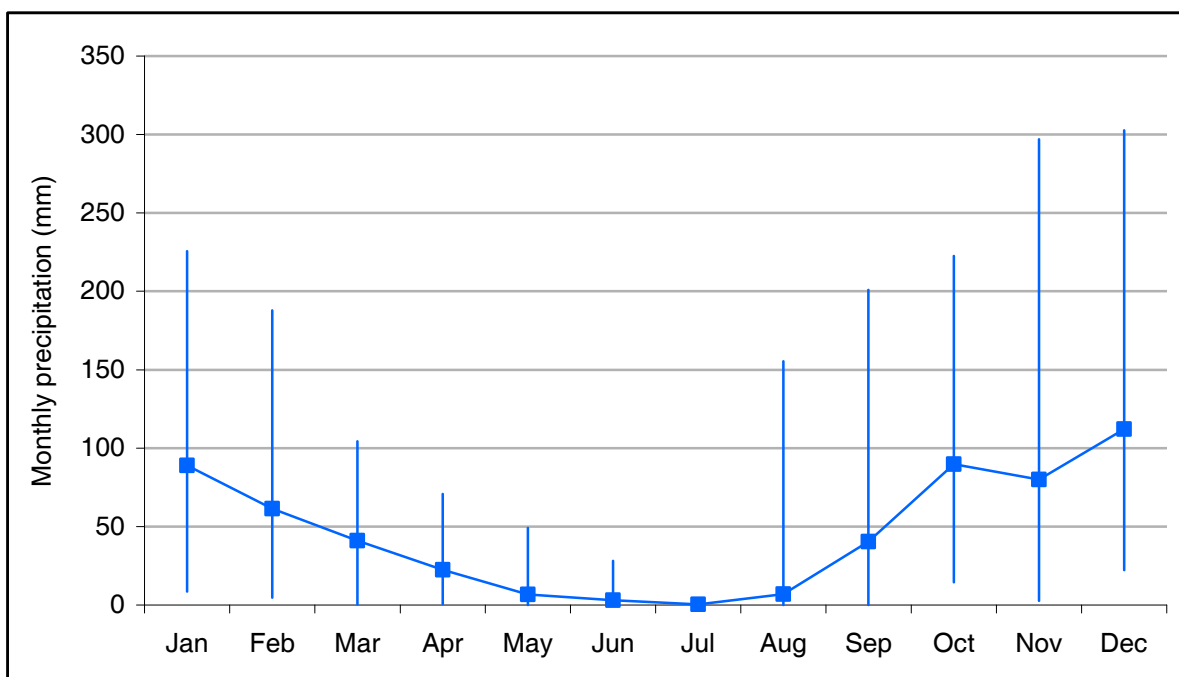
Figure 5b. Percentage distribution of the total annual precipitation
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

Moreover, climate data show that November gives the highest precipitation variability throughout the year, ranging from a minimum of 2.6 mm to a maximum of 297.0 mm (figure 6).

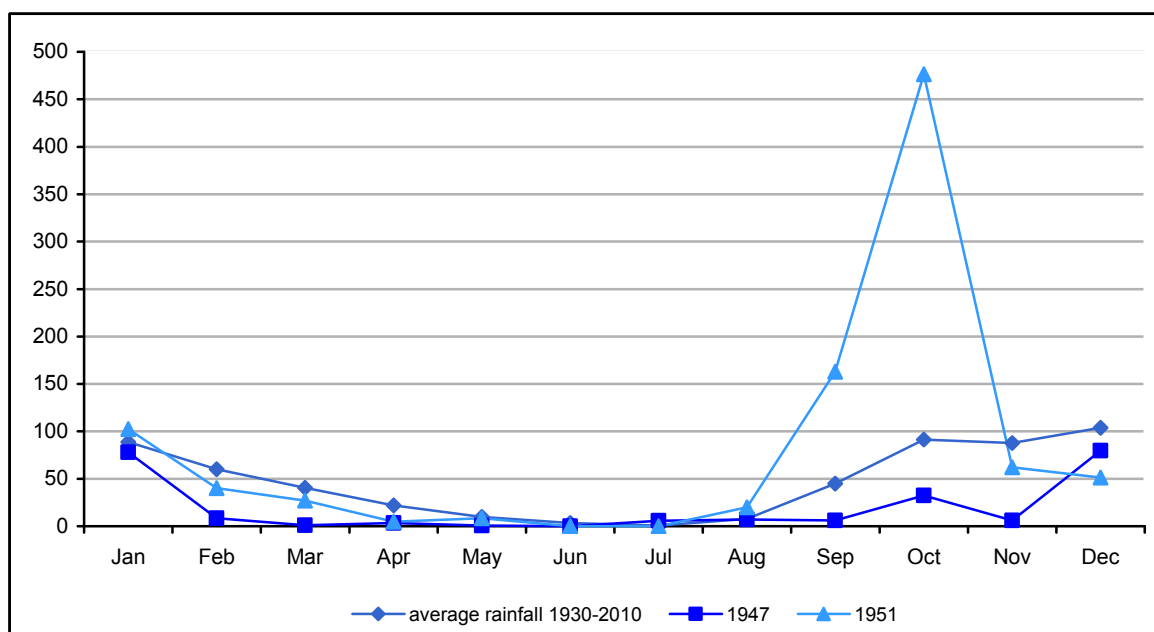
Figure 6. Monthly means and variability of the total precipitation
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

Data gathered by the Malta Airport MetOffice show that the driest year was 1947 when 228.41 mm of precipitation fell over Luqa Airport. Four years later, in 1951, a record maximum of 955.62 mm was registered at the same site. For comparative purposes, figure 7 shows the monthly precipitation totals of 1947 and 1951 alongside the average monthly total precipitation registered during the period 1930-2010.

Figure 7. Total monthly precipitation of the driest and wettest years compared with the 1930-2010 average

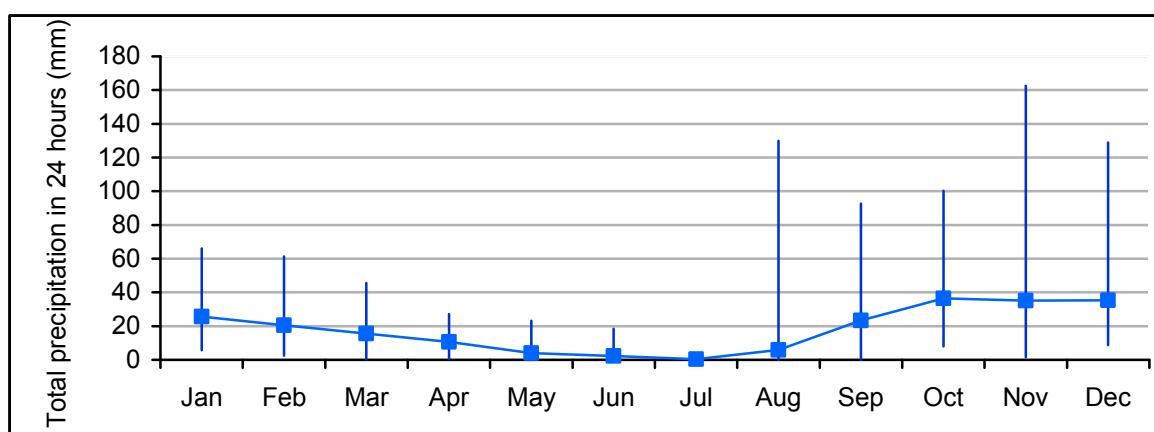


Data collected by the Malta Airport MetOffice

The total amount of precipitation recorded in 24 hours is a good indicator of the vigour and duration of storms. The climatological trend of the total amount of precipitation recorded in 24 hours is shown in figure 8. Undoubtedly, November shows the greatest variability which is attributed to convective storms triggered by the movement of the continental air mass from the North African region over cooler areas in the Central Mediterranean.

Figure 8. Monthly means and variability of the total precipitation recorded in 24 hours

(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

Table 6 shows the highest precipitation ever recorded on a monthly basis over the Maltese Islands during the period 1922-2010 in comparison with the mean monthly precipitation of the same period. The highest amount of monthly precipitation ever recorded was of 476.50 mm which fell during October 1951.

Table 6. Mean monthly precipitation, maximum and occurrence during the period 1922-2010

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Mean monthly precipitation (mm)	87.75	60.53	42.73	22.10	9.92	3.12	0.49	7.31	42.94	86.28	87.73	102.48
Highest monthly precipitation (mm)	248.20	187.90	178.00	118.40	49.10	76.20	18.00	155.50	266.90	476.50	420.30	302.60
Year of highest monthly precipitation (mm)	2009	1965	1925	1994	1976	2007	1959	1964	1997	1951	1999	1970

Data collected by the Malta Airport MetOffice

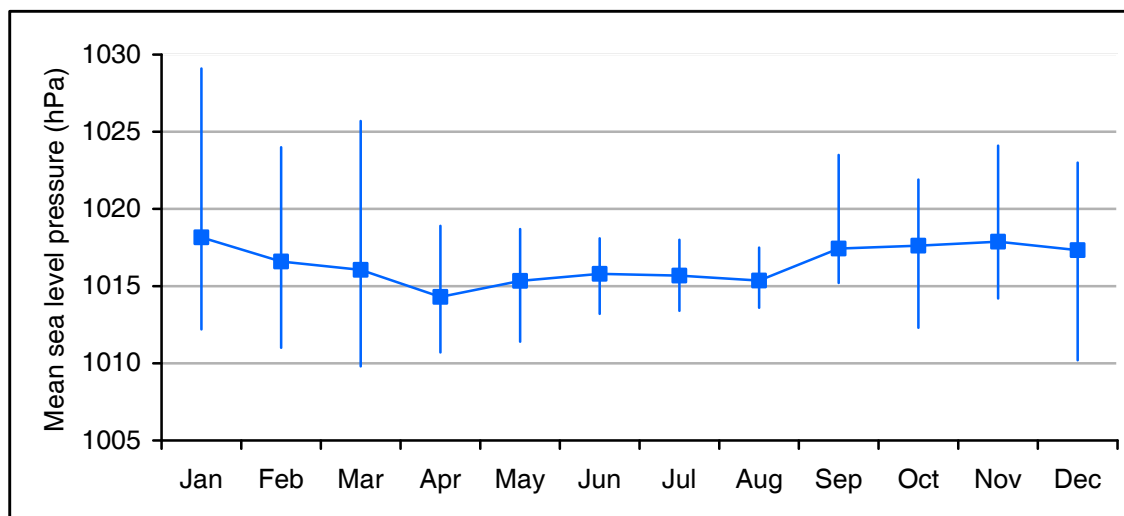
2.3 Atmospheric pressure

This section refers to the analysis of the surface air pressure which is measured or estimated at an elevation equal to mean sea level. An understanding of pressure is very important in the consideration of winds and storms since variations in horizontal atmospheric pressure lead to the development of winds that play a significant role in shaping the local weather.

Throughout the years different types of barometers were used by the MetOffice to measure the air pressure at station level. The type of instruments included mercury as well as aneroid barometers. The latest series of barometers used by the MetOffice are digital pressure sensors that measure air pressure relative to the perfect vacuum pressure (zero PSI or no pressure).

Figure 9 shows the mean monthly sea level pressure and its variability during the period 1961-1990. These data show that the yearly mean sea level pressure over the Maltese Islands is 1,016.5 hPa and ranges from 1,014.9 hPa to 1,018.3 hPa. During this period the highest variation is observed during January. It is interesting to note that June, July and August showed very similar averages and variability in the sea level pressure, which is indicative of the stable weather conditions during the summer months. The lowest air pressure values were observed during March and December, while the highest value of 1,029.1 hPa was reached during January.

Figure 9. Monthly means and variability of the sea level pressure
(Based on the 30-year climate period 1961-1990)



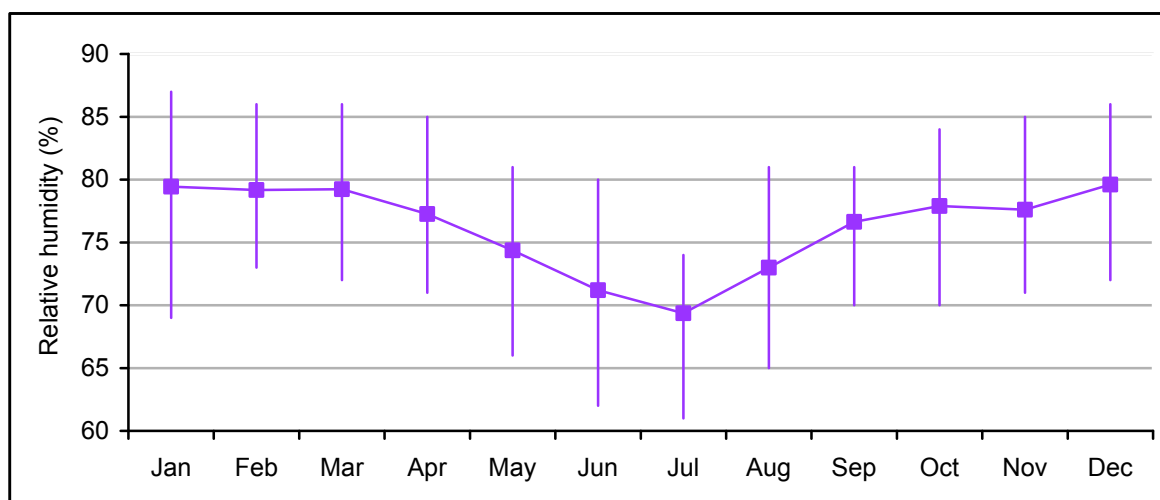
Data collected by the Malta Airport MetOffice

2.4 Relative humidity

Air humidity is a good indication of how close the atmosphere is to saturation by water vapour. This information can anticipate as well as explain the formation of clouds and fog. Since 2001, the relative humidity and the dew point at Luqa Airport have been measured by means of an electronic humidity sensor.

Figure 10 shows the variability of the relative atmospheric humidity over the Maltese Islands during the period 1961-1990. It shows that the mean relative humidity varied from a minimum of 61 per cent in July to a maximum of 87 per cent in January. The transition between July and August shows the highest gradient in both the mean and maximum relative humidity. The highest monthly variability occurred during January and June.

Figure 10. Monthly means and variability of the relative humidity
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

Ancillary observations indicate that during the summer season the degree of physiological stress caused by heat seems to be more dependent on the temperature than on humidity, which has the lowest percentage value during the summer period (figure 10). On the contrary, humidity seems to play a greater role in weather discomfort during the cold winter months.

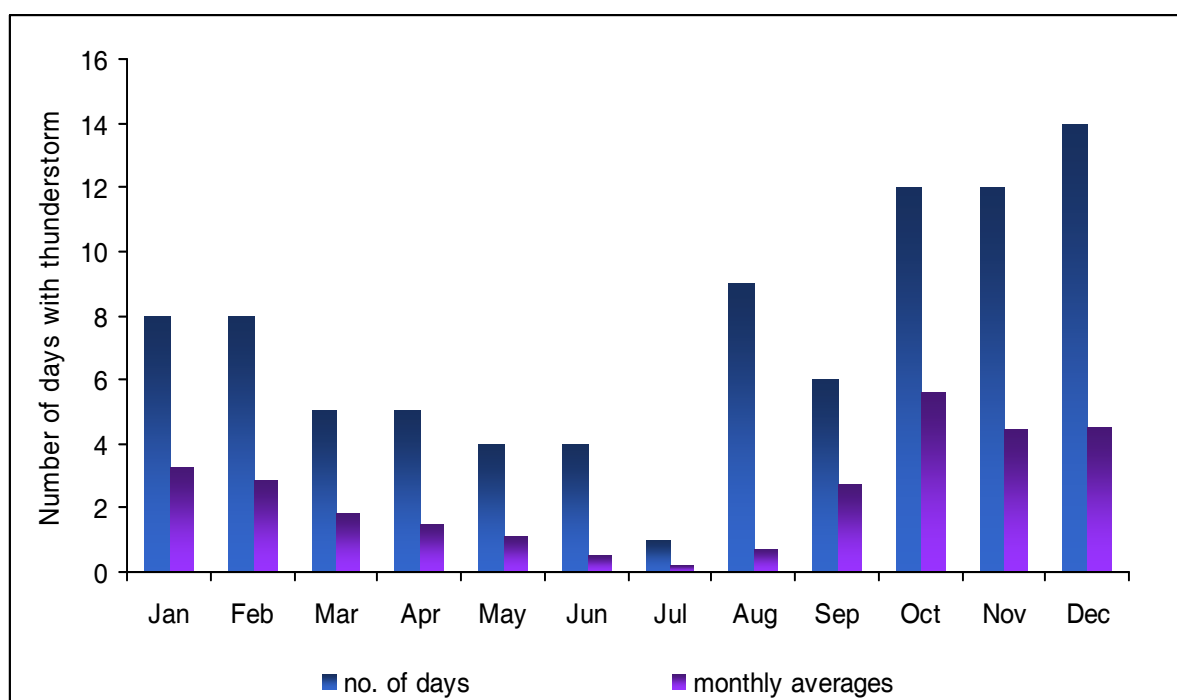
Records from the Malta Airport MetOffice show that the extreme monthly values of relative humidity occurred in December 1993 and June 2006 when the mean monthly values were 89 per cent and 54 per cent respectively.

2.5 Thunderstorms and hail

Thunderstorms are produced by cumulonimbus clouds accompanied by lightning and thunder. They are usually of short duration but are able to produce strong wind gusts and heavy rainfall, and which may be accompanied by hail.

In this analysis, a day with thunderstorm refers to one during which thunder has been heard at Luqa Airport. Figure 11 shows that during the period 1961-1990, the month with the highest mean number of thunderstorm days is October (5.6 days), compared to the lowest value in July (0.2 days). On average there are 29.3 days with thunderstorms spread unevenly throughout the year.

Figure 11. Monthly average and maximum number of days with thunderstorms
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

During the period 1951-2010, extremes ranged from just 14 thundery days during 1968 to a maximum of 43 days in 1986.

In thunderstorm clouds, accretion processes lead to the formation of hail. Over Luqa Airport, the yearly average number of days with hail is 6.3. During the period 1961-1990, December exhibits the highest mean number of days with hail (1.4), while no days with hail have been

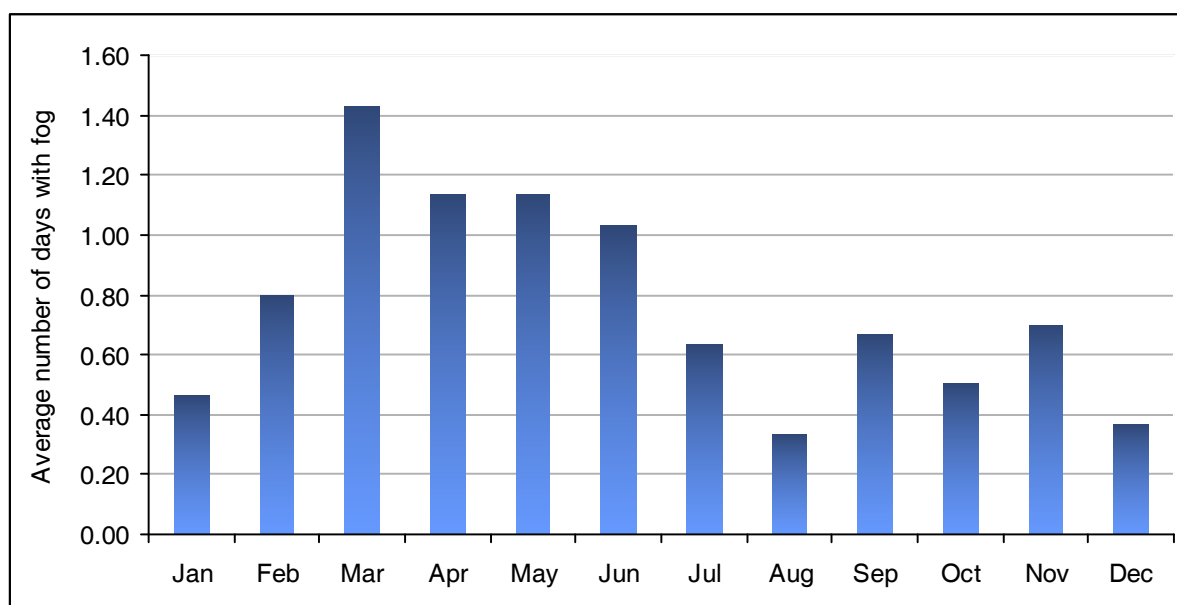
registered from June to August. Annual extremes range from just two days with hail in 1977 to a maximum of 15 in 2005.

2.6 Fog

The Malta Airport MetOffice keeps a constant watch over Luqa Airport for fog events. As part of its half-hourly weather reports to the aviation sector, the MetOffice estimates the visibility defined by ground objects of suitable dimensions and known distances that can be seen and recognised when observed on the horizon during daylight or night time if the general illumination were raised to the normal daylight level (WMO, 2003).

During the period 1961-1990, the annual average number of days during which fog events were registered was 9.2. Figure 12 shows that March had the highest average (1.4 days) followed by February (0.8 days). Conversely, July had the lowest average (0.3 days).

Figure 12. Average monthly number of days with fog
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

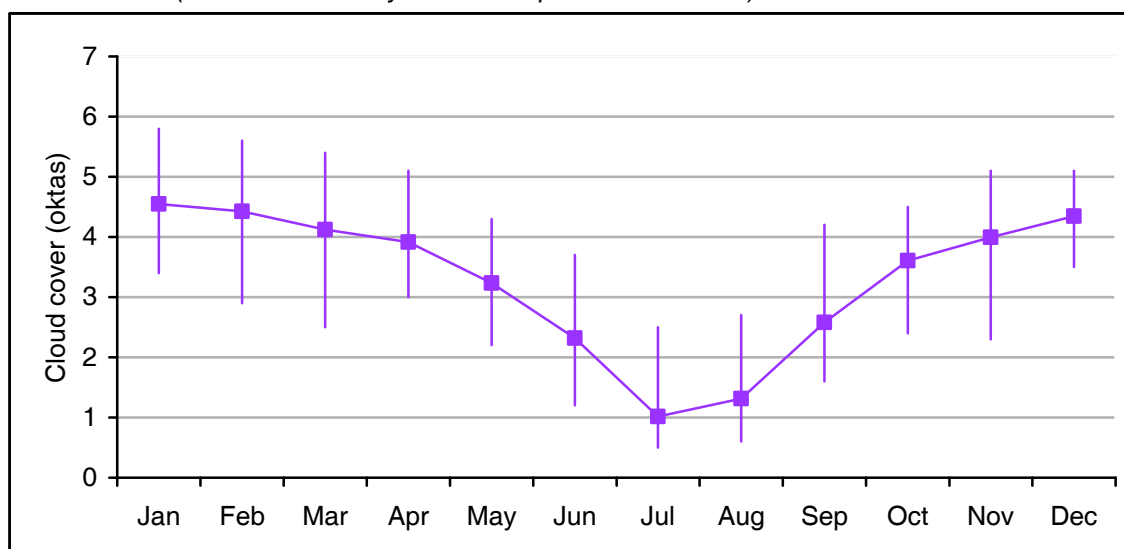
Regarding climate extremes observed at Luqa Airport, annual fog events range from just four days (in 1982) to 17 days (in 1967).

2.7 Cloud cover

The term 'cloud cover' refers to the amount of sky covered by specific cloud layers. Cloud cover is recorded in line with the WMO-approved standard practice of dividing the full sky hemisphere into eight virtual sectors. Cloud coverage is observed and reported by trained meteorological observers at the Malta Airport MetOffice.

The monthly trend in cloud cover during the 30-year climate period of 1961-1990 is shown in figure 13. The pattern shows a decrease from a maximum in January to a minimum in July, which increases again towards December.

Figure 13. Monthly means and variability of the cloud cover
(Based on the 30-year climate period 1961-1990)



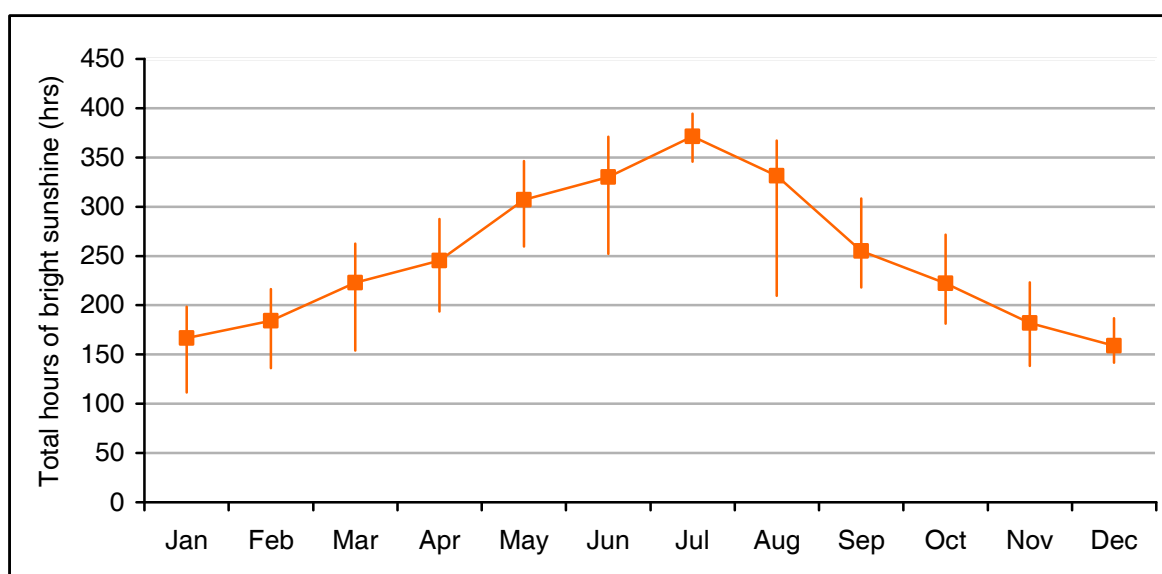
Data collected by the Malta Airport MetOffice

2.8 Duration of bright sunshine

The Malta Airport MetOffice measures the number of hours with bright sunshine by means of a Campbell-Stokes recorder. This instrument uses a spherical glass lens to focus the image of the sun onto a specially designed card, which is scorched when the sunlight intensity exceeds a predetermined threshold. The total length of the burn trace is proportional to the number of hours during which the sunshine was sufficiently bright to burn the card.

During the period 1961-1990 much of the variability occurred during August, possibly due to the weather transition that starts to occur during this month (figure 14).

Figure 14. Monthly means and variability of the total hours of bright sunshine
(Based on the period 1995-2010)



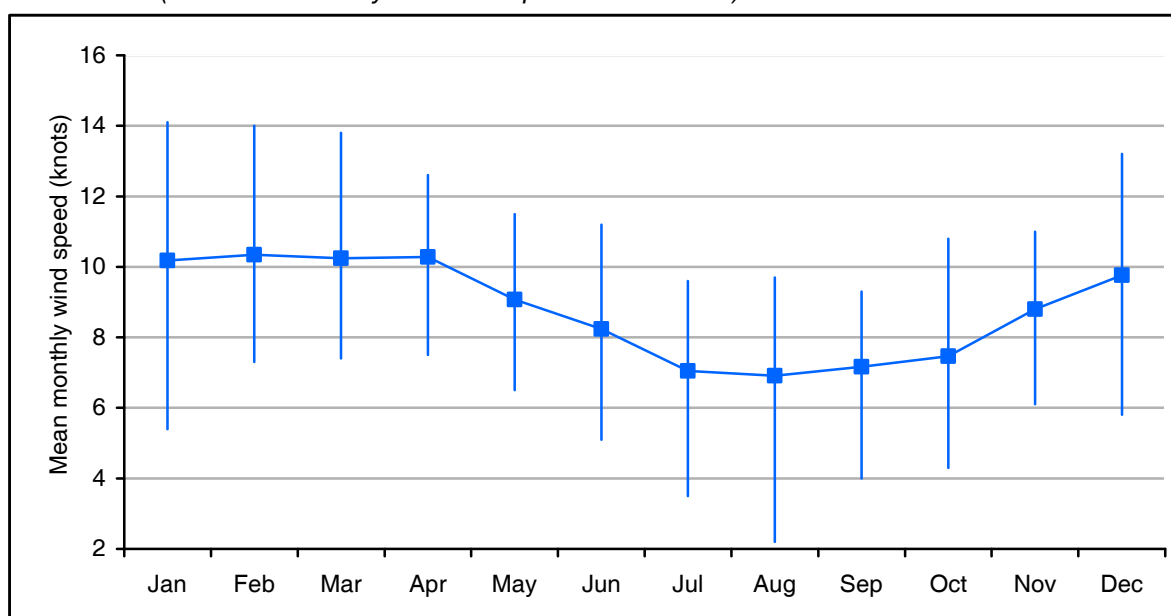
Data collected by the Malta Airport MetOffice

2.9 Surface wind speed, wind direction and gale events

Surface wind speed and direction are measured by using cup anemometers and wind vanes which are situated at a standard height at the Malta Airport MetOffice. The type of instrumentation used for measuring these parameters changed little with time and has been located at Luqa Airport since 1947.

Observations show that the mean annual wind speed during the period 1961-1990 is 8.8 knots or 16.3 km/hr (figure 15). However, data show considerable variation in the monthly averages. Figure 15 shows the averages of the mean monthly wind speed as measured from Luqa Airport during the period 1961-1990. During this climate period, January gave both the highest extreme mean monthly wind speed of 14.1 knots, or 26.1 km/hr and the highest variability in the mean monthly wind speed. On the other hand, April gave the highest mean monthly wind speed of 10.3 knots (or 19.1 km/hr).

Figure 15. Monthly means and variability of the wind speed
(Based on the 30-year climate period 1961-1990)

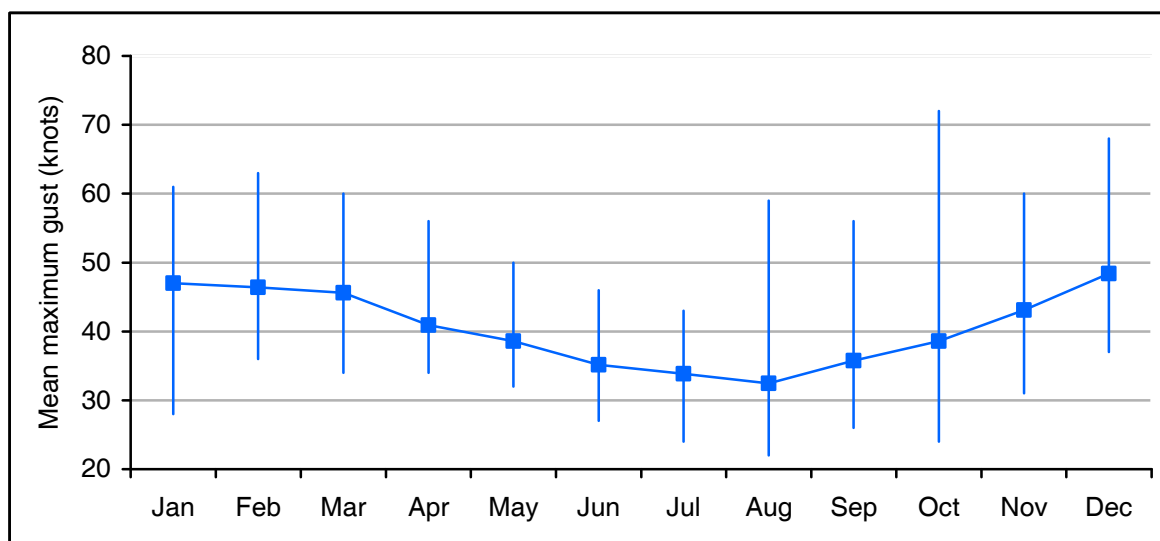


Data collected by the Malta Airport MetOffice

During 1965 a record yearly average wind speed of 10.3 knots (or 19.1 km/hr) was registered at Luqa Airport. At the other extreme, the lowest yearly average wind speed was recorded in 2003 and measured 7.1 knots (13.2 km/hr).

As to the incidence of peak gusts during the 30-year climate period, January showed the highest average wind gust with a speed of 47 knots (87 km/hr). Figure 16 shows that the highest variability in wind gusts at Luqa Airport occurred during October with a variation in wind speed ranging from 24 knots (or 44.5 km/hr) up to 72 knots (or 133.4 km/hr).

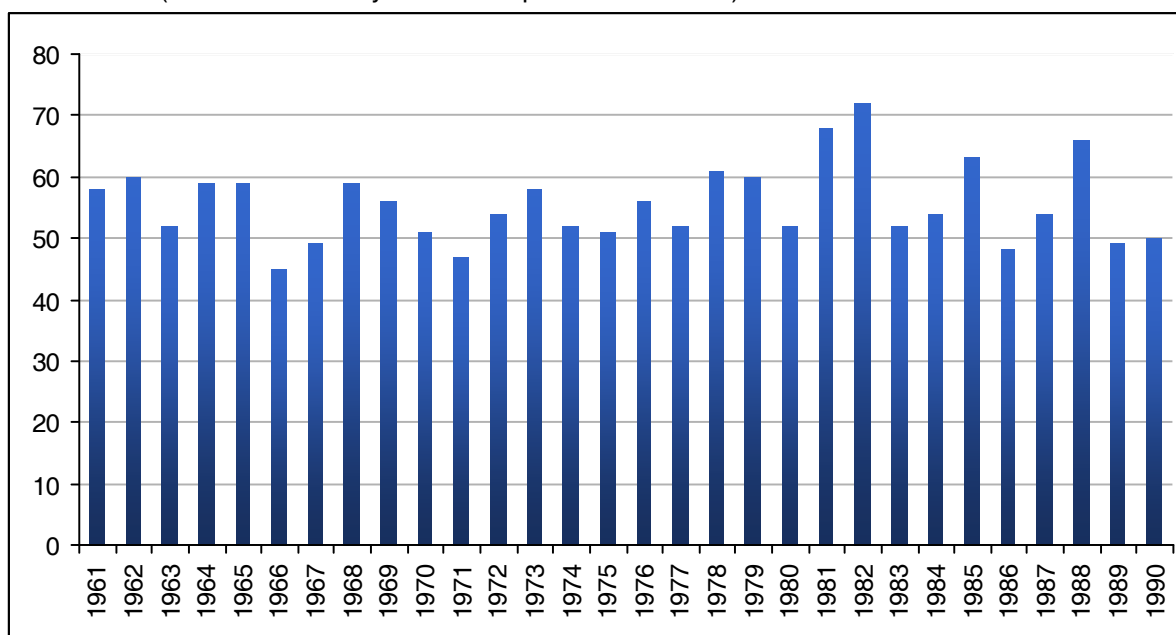
Figure 16. Monthly means and variability of wind gusts
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

Figure 17 shows the occurrence of gale events reaching Beaufort scale Force 8 or more (a scale that is equivalent to 34 to 40 knots or 62 to 74 km/hr). During the climate period 1961-1990 the highest wind gust to be registered at Luqa Airport occurred on 11 October 1982. On this day gale force winds from the Northwest reached a speed of 72 knots (133.4 km/hr). Malta's climatology shows that both March and December have the highest frequency of gale force winds with a total of 14 days, while the lowest frequency occurs during the summer month of July, with a total of three days (figure 18).

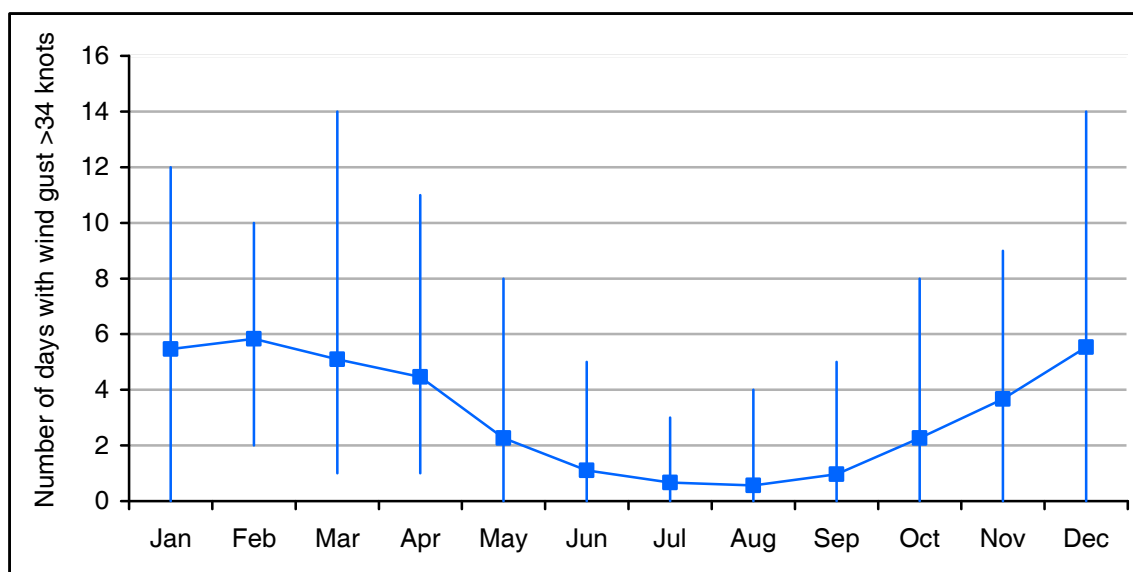
Figure 17. Mean annual wind gusts
(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

Figure 18. Monthly means and variability in the number of days with wind gusts greater than 34 knots

(Based on the 30-year climate period 1961-1990)



Data collected by the Malta Airport MetOffice

Since 1961 there were two years – 1962 and 1978 – with a record total of 68 days when wind gusts exceeded 34 knots (63 km/hr). During 2002 a total of just five days with gale force winds were recorded.

2.10 Wind direction

Figure 19 is a wind rose showing the variation in wind direction classes and its frequency for the period 1997-2006. During this period the frequency of calm winds was 2 per cent while that of variable winds was 4.2 per cent.

The most common wind direction is the North-westerly which blows on an average of 20.7 per cent days in a year. Next in frequency is the wind blowing from the West followed by winds blowing from West Southwest (8.9 per cent), the South Southwest (7.8 per cent) and North Northwest (7.4 per cent). The other wind directions show no dominance. The North wind constitutes around three per cent of the total days, making it the least dominant wind over the Maltese Islands.

Figure 19. Wind rose for the period 1997-2006

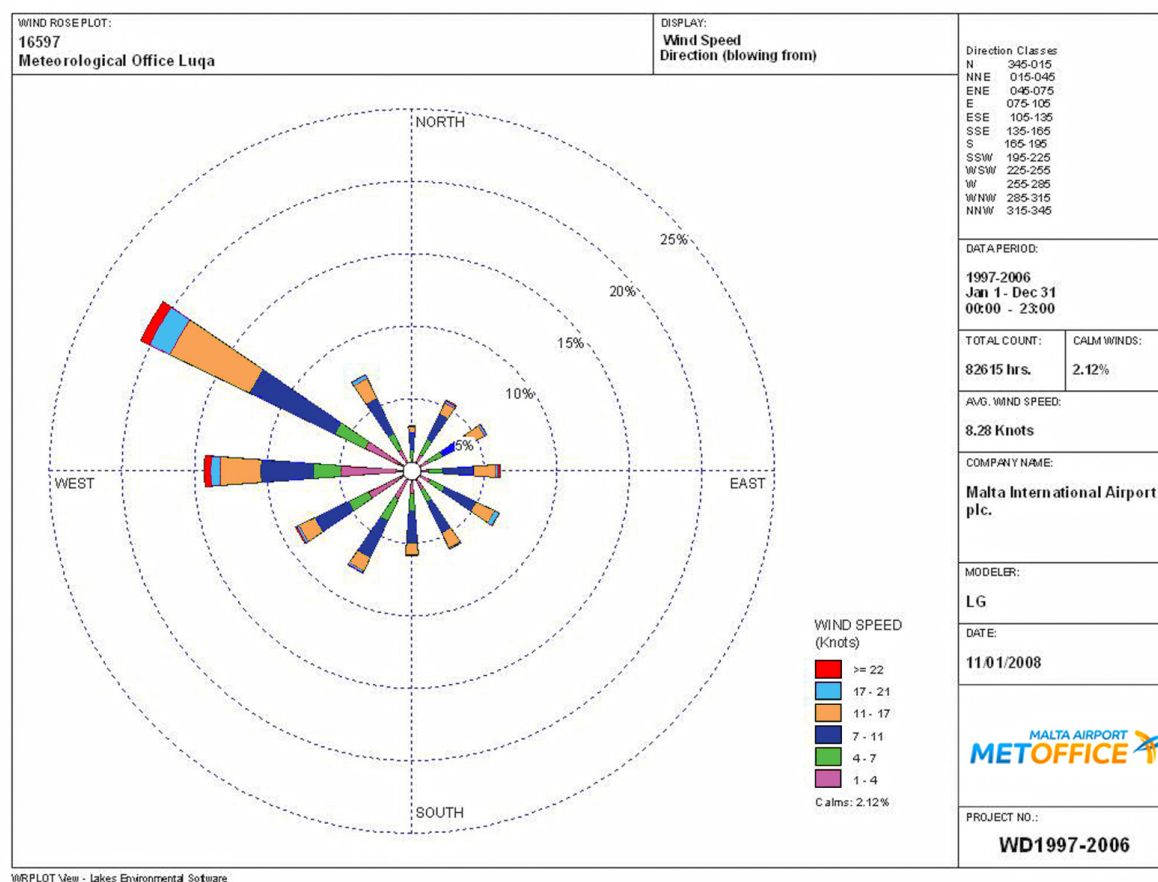


Figure 20. Climate summary for the Maltese Islands

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Average temperature (°C)	12.2	12.4	13.4	15.5	19.1	23.0	25.9	26.3	24.1	20.7	17.0	13.8
Average maximum temperature (°C)	15.2	15.5	16.7	19.1	23.3	27.5	30.7	30.7	28.0	24.2	20.1	16.7
Average minimum temperature (°C)	9.2	9.3	10.1	11.9	14.9	18.4	21.0	21.8	20.1	17.1	13.9	11.0
Sunshine hours (hrs)	159	171	224	247	300	328	365	338	260	221	185	156
Sea level Pressure (hPa)	1018.2	1016.6	1016.1	1014.3	1015.3	1015.8	1015.7	1015.4	1017.4	1017.6	1017.9	1017.3
Rainfall (mm)	89	61	41	23	7	3	0	7	40	90	80	112

Data collected by the Malta Airport MetOffice for the climate period 1961-1990

2

**Malta's climate anomaly trends and
possibly related socio-economic impacts**

3.0 MALTA'S CLIMATE ANOMALY TRENDS

The departure of a weather element from its long-period average value as measured at a fixed geographic location provides a measurement of its anomaly at that particular location. Contrary to the daily measurement of weather elements at a single point in time and space, the measurement of climate anomalies takes into account weather patterns over a long period of time. This is the only way to identify climatic changes relative to particular geographical locations.

Discerning significant trends within a relatively long time frame is never a straightforward exercise. Short-term, natural fluctuations of the weather above or below the mean tend to be common, which is usually coupled to a certain degree of fluctuation in the recorded data from instrument and measurement errors. In order to reach a reliable pattern of climate tendencies, these errors must be reduced as much as possible, such as by averaging out the measurements. When combined into an overall average, deviations arising due to outliers are smoothened and trends present in the data become more apparent and amenable for analysis and interpretation.

International climate centres identify changes in climate trends by comparing changes in weather elements against the locality's long-term observed climate norm that is averaged over a reference period of 30 years (NCDC, 2010). The same principle is applied here in this document in order to underline the general long-term trends of a number of weather elements for the Maltese Islands.

3.1 Statistical analysis and the trend anomaly diagram

In climate studies statistical methods are applied to ensure that climate data are interpreted correctly and that apparent trends are meaningful. The simplest type are linear (or straight line) trends to indicate the presence or absence of a continuous trend over time. Linear trends are widely used in such studies since, when correctly applied, they provide a simple way to characterise the overall change and its magnitude¹. Nevertheless, significantly different trends can also occur for particular periods of a single climate data set.

Due to the extensive analysis required to assess the presence, and more importantly, the significance of trends, only a limited number of weather elements are considered here. These are:

- ambient air temperature;
- precipitation;
- atmospheric pressure;
- number of days with gale force winds (or degree of storminess);
- cloud cover.

The trend analysis for these variables (apart from the number of days with gale force winds²) measured during the period 1951-2010 are discussed and presented graphically to show the anomalies or departure of their mean annual values from the reference climate norm of 1961-1990. In these graphs the zero line represents the normal values derived from the

¹ The NSO is aware that common procedures such as linear regression and application of tests of significance all carry assumptions and limitations for their use for climate analysis. This document analyses mean annual values and their departure from the climate standard. In doing so any individual outlier observations taken at a specific time during the year are significantly smoothened.

² Digital records related to the number of days with gale force winds are available from 1961 onwards.

standard climate; deviations above it represent times when the parameter is above this norm and vice versa.

The non-parametric Mann-Kendall test (Sneyers, 1990) was applied to identify the existence of climate trends. This test is a widely used method to discover the presence of trends in climate data (Perry, 2008; Ventura *et al.*, 2002). Statistical significance testing between the last 15 years with the previous period of 1951-1994 was also performed to note any statistically significant variations between these two periods.

It is not the scope of this publication to question the possible causes of the underlying climate trends, nor whether such trends are predominantly random or deterministic in nature. This is hindered by (1) the short length of the data available (59 years or less); (2) inadequate knowledge of the statistical properties of such variables; and (3) generally poor understanding of possible linkages between the climate variables and their local, natural modes of variability.

Relationship of climate variables with socio-economic data (Appendix 1)

Climate factors such as temperature, rainfall and gale storms can have a significant impact on a number of local socio-economic sectors (WMO, 2010). There can be instances where the weather may directly influence the seasonal and year-to-year changes in economic performance, but an equivalent impact on these sectors can also be due to independent, socio-economic pressures (such as fiscal, taxation, subsidies, etc.) where the end result can mask the impact due to a changing local climate. However, at the global level there is general agreement that there is a strong linkage between weather, society and the economy.

Malta's tourist industry relies, among other factors, on the warm temperatures and mild winters for attracting prospective visitors. Agriculturally, crop yields are observed to increase when growing conditions are ideal. Construction projects advance more rapidly when weather conditions are favourable. Hot or cold weather can affect the health of weak individuals. Energy usage is closely linked to seasonal temperature and humidity fluctuations. In fact, the demand for energy such as electricity and domestic gas increases during hot summers and cold, humid winters. Transportation by sea, land and air can be adversely affected by bad weather conditions.

3.2 Trends in the ambient air temperature

Air temperature is one of the most relevant climatic parameters and significant and consistent changes from the norm are among the first signals of a changing climate. Prolonged extreme temperature events over the Maltese Islands may be due to heat waves³, droughts⁴ or unusually cold spells. Temperature changes affect almost all the climate parameters considered in this publication, directly or indirectly.

³ A basic definition of a heat wave implies that it is an extended period of unusually high atmosphere-related heat stress, which causes temporary modifications in lifestyle and which may have adverse health consequences for the affected population. The definition used by the Malta Airport MetOffice for heatwave over the Maltese Islands is that recommended by the WMO as being a consecutive 5-day period during which the maximum temperature is 5°C above the average maximum temperature for that particular month.

⁴ There is no universally accepted definition for drought. This phenomenon is an insidious natural hazard that results from a deficiency in precipitation amounts which, when extended over a season or longer period of time, is insufficient to meet the demands of human activities and the environment. Therefore drought should be considered as a relative, rather than an absolute, condition.

3.2.1 Time series analysis

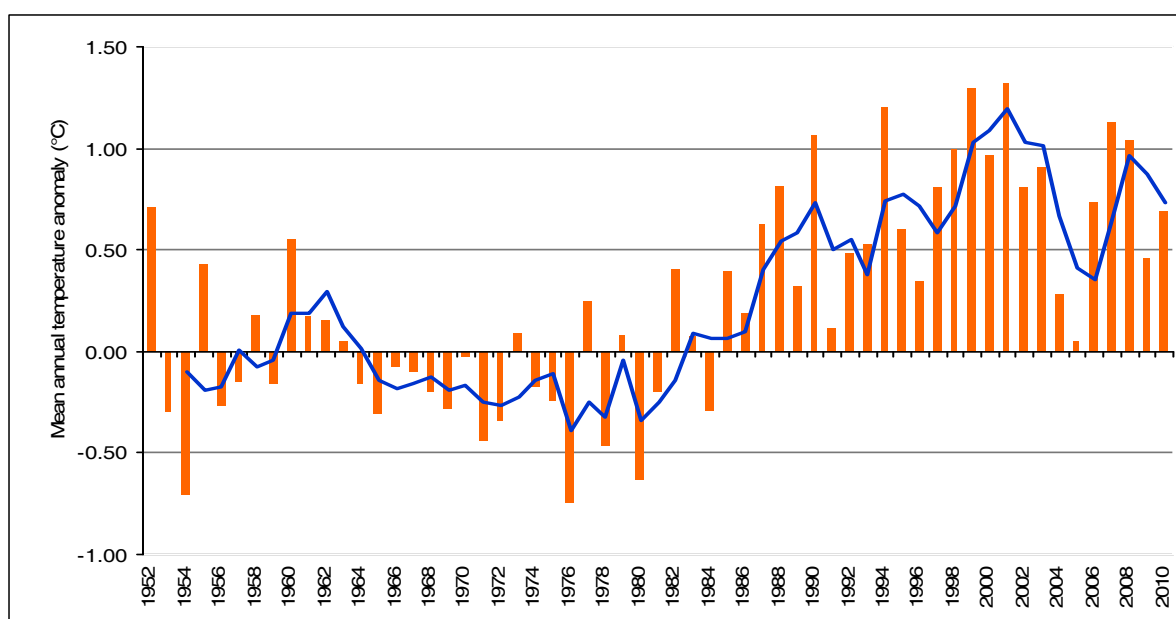
The following is an analysis of the trends of the mean, maximum and minimum ambient temperature measured at Luqa Airport, which is Malta's climate reference point (Station Number 16597).

The anomaly exhibited by the annual mean air temperature⁵ from the climate norm of 1961-1990 is shown in figure 21. The 3-year moving line average shows a rise in the anomaly after 1981 where the highest anomaly of +1.2°C was reached in 2001, followed by a reduction to +0.69°C in 2010. Both 2004 and 2005 appear to have been slightly cooler when compared to the preceding 21 years.

Figure 21. Annual mean air temperature anomaly for the period 1951-2010

3-year running average shown in blue

Based on a 30-year climatology (1961-1990)



Note: For reasons of display, the chart may not show the whole time series of analysed data.
Data collected by the Malta Airport MetOffice

Using a linear regression model, the rate of change is defined by the slope of the regression line, which in this case is 1.1°C since 1951. The Mann-Kendall test confirmed that the positive trend observed is significant with a 99 per cent confidence level.

This local rate of change is greater than what the Intergovernmental Panel on Climate Change (IPCC) reports for the global, but 100-year linear trend (1906-2005) of 0.7°C ± 0.2°C (IPCC, 2007). The global linear warming trend observed from 1956-2005 is nearly twice that for the period 1906-2005 (IPCC, 2007), which makes it slightly higher than the local rate of change.

The t-test showed that there is significant difference at the 95 per cent confidence level between the means of the periods from 1995-2010 to that from 1951-1994. Analysis of the data distribution for 30-year periods is shown in figure 22. In all four cases, the data have a

⁵ The mean air temperature is based on the average temperature recorded between 0900UT and 2100UT in a shaded enclosure at a height of approximately 1.2 m above the ground.

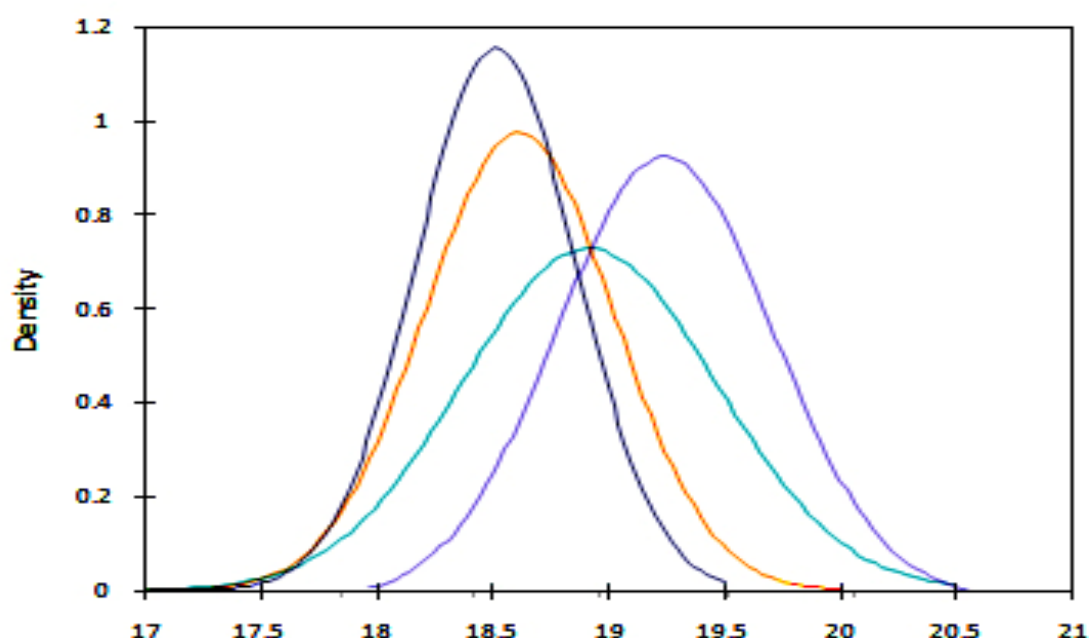
normal distribution at the 95 per cent confidence level. A shift towards an increased mean and variance in ambient air temperature is evident from the data.

In statistical terms this shift can be understood by studying the behaviour of the ‘bell curve’ (WMO, 2003). The position of the peak of the curve over the horizontal axis provides the mean, and the width of the curve is a measure of the variance⁶ of the weather element in question. It is understood that if the climate undergoes a warming without any change in its variance, the whole bell curve moves sideways. The consequence of a shift to a higher mean temperature is fewer cold days and more hot days, and a higher probability that previous record high temperatures will be exceeded.

If, however, there is an increase in variance but no change in the mean (which is a close description of the two periods 1951-1980 and 1961-1990), then the curve becomes fatter and lower. The consequence is that there were hotter (and colder) days and a high probability that previous records for the hottest days and, to a lesser extent, the coldest days (since the mean has been shifted to higher temperatures) were broken.

Local data show a shift in both the *mean* and *variance* for the period 1951-2010. This means a sideways shift (to the right, meaning warmer) and a fatter curve (meaning higher variance). The effect is for relatively little change in the frequency of extreme temperatures, but an increased hot weather and previous record high temperatures being exceeded far more often. The average temperature of 18.5°C given by the data distribution for the period 1951-1980 is markedly different from that of the most recent period of 1981-2010, during which the temperature distribution has shifted more to the right to an average of 19.2°C. This pattern was most evident during the 1971-2000 period (figure 22).

Figure 22. Distribution fitting of the annual temperature (x-axis) taken during the periods 1951-1980 (dark blue), 1961-1990 (orange), 1971-2000 (light blue) and 1981-2010 (purple)



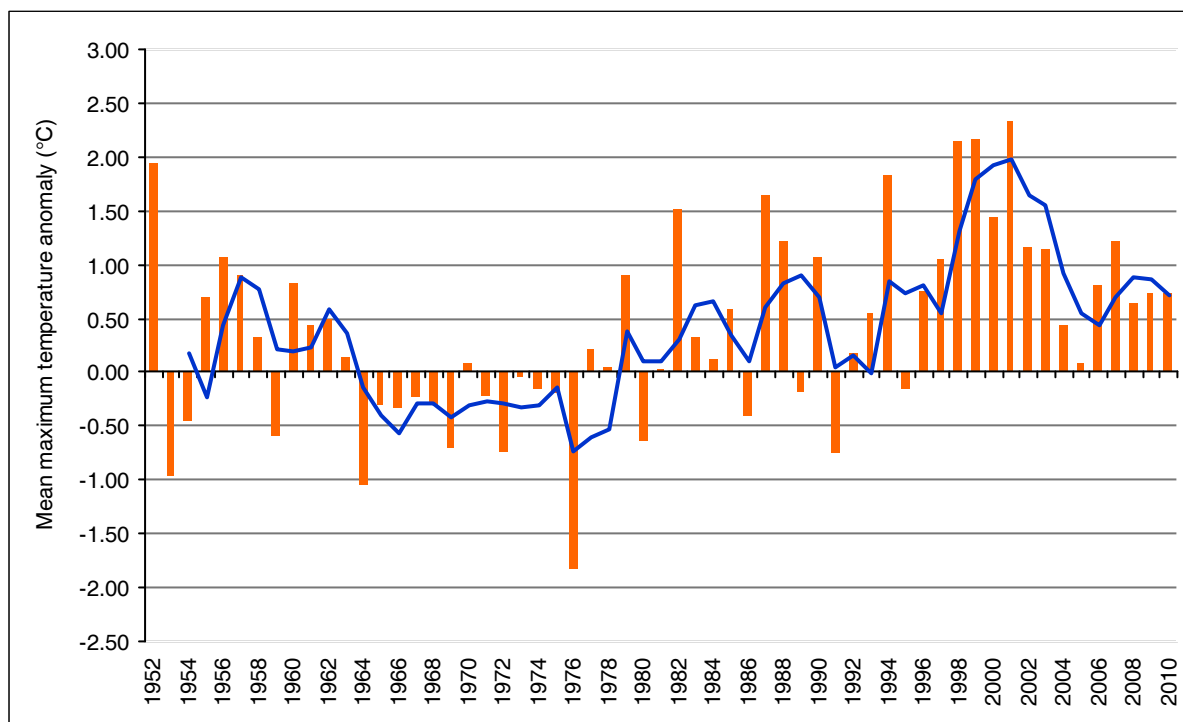
⁶ Variance is the arithmetic mean of the squares of the deviations of all items (in a set of numbers) from their arithmetic mean. Variance and its square root (the standard deviation) are of fundamental importance as a measure of dispersion.

The trend of anomaly of the annual maximum temperature⁷ from the climate norm of 1961-1990 is shown in figure 23. The 3-year moving line average shows a rise in the anomaly after 1991 and reaches a maximum of almost +2.0°C in 2001. The 3-year moving average may be pointing to a cyclic pattern for the period 1951-1991, which might have been broken by the broad peak shown between 1996 and 2004.

As in the case of the mean temperature anomaly trend, 2005 also shows a markedly small departure from the climate norm. Overall, the moving average (blue line, figure 23) from 1991 onwards may also be indicative of a departure from the norm, which reaches a minimum anomaly in 2005 but which again increases after three years.

Translated in terms of rates of change, the observations give an increasing trend in the maximum air temperature of 1.2°C from 1951 to 2010. The Mann-Kendall test confirmed that the positive trend observed is significant with a 99 per cent confidence level.

Figure 23. Annual maximum air temperature anomaly for the period 1951-2010
3-year running average shown in blue
Based on a 30-year climatology (1961-1990)



Note: For reasons of display, the chart may not show the whole time series of analysed data.
Data collected by the Malta Airport MetOffice

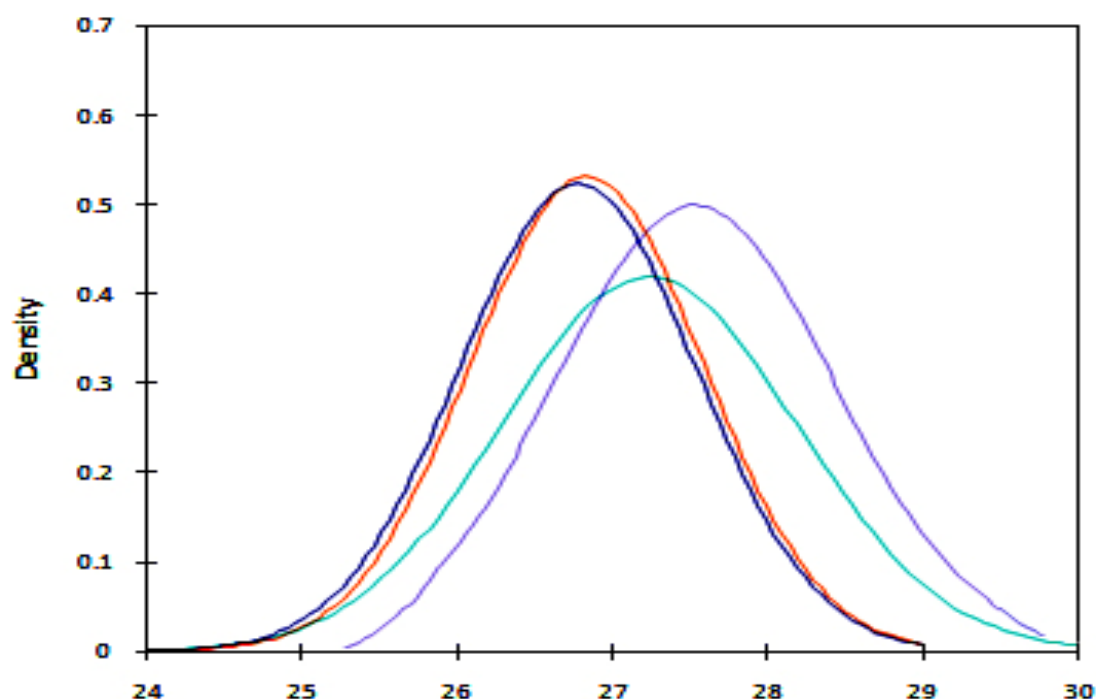
The t-test showed that there is a significant difference at the 95 per cent confidence level between the means of the periods 1995-2010 and 1951-1994.

The frequency distribution of the annual maximum temperatures for the three 30-year periods is shown in figure 24. In all four cases, the data have a normal distribution at the 95 per cent significance level. The shift in the normal distribution towards a higher temperature complements that observed by the mean annual temperature. The average temperature of

⁷ The annual maximum temperature is derived by measuring the resultant mean of the monthly maximum temperature for the twelve months of each respective year.

26.8°C noticed during the period 1951-1980 is markedly different from the most recent period of 1981-2010, where the frequency distribution has shifted more to the right to an average of 27.6°C. Looking at the density values, the two most recent periods show a higher variance, coupled with a probability of higher occurrence of extreme temperatures.

Figure 24. Distribution fitting of the annual maximum temperature (x-axis) taken during the periods 1951-1980 (dark blue), 1961-1990 (orange), 1971-2000 (light blue) and 1981-2010 (purple)

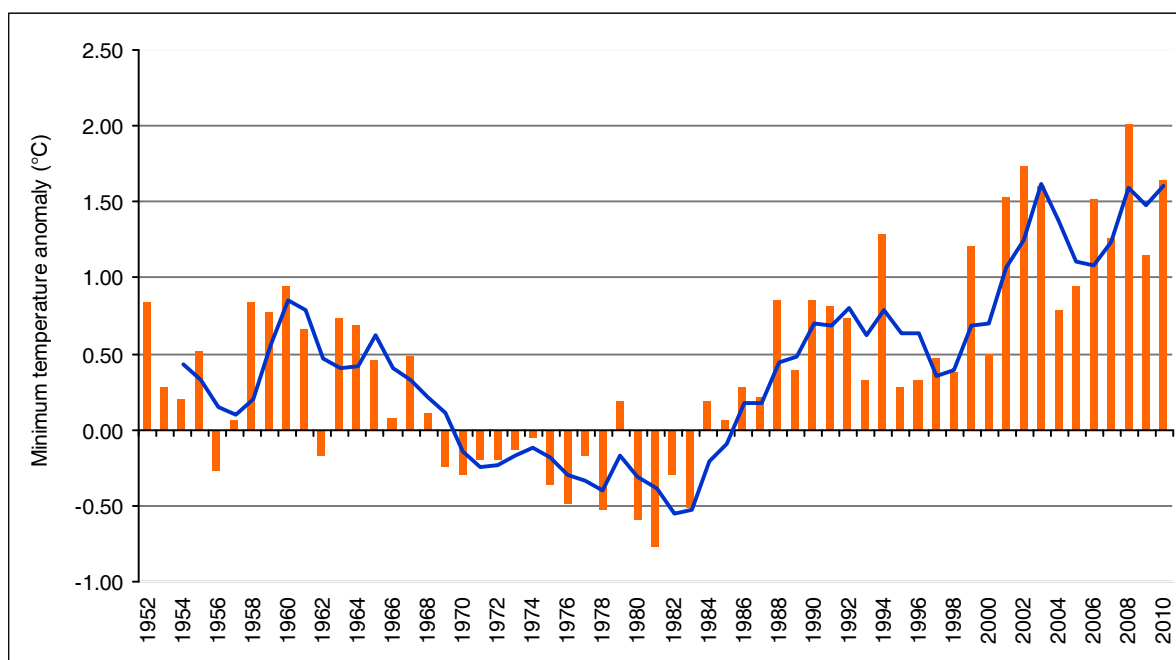


The anomaly trend of the annual minimum temperature⁸ from the climate norm of 1961-1990 is shown in figure 25. The trend is again a positive one where the 3-year moving line average shows temperature anomalies in excess of the norm from 1985 onwards. As regards absolute annual values, various instances are of interest. The minimum air temperature anomaly rose sharply from the year 2000 (+0.5°C) to 2001 (+1.5°C). However this increase was not sustained since by 2005 a dip in the anomaly compared to previous years is noted, again showing that 2005 has been a relatively cool one in recent years. The highest minimum air temperature anomaly of +2.0°C was reached in 2008.

Analysis shows a warming trend of 1.1°C in the minimum temperature between 1951-2010. The Mann-Kendall test confirmed that the positive trend observed is significant with a 99 per cent confidence level.

⁸ The annual minimum temperature is derived by taking the resultant mean of the monthly minimum temperature for the twelve months of each respective year.

Figure 25. Annual minimum air temperature anomaly for the period 1951-2010
 3-year running average shown in blue
Based on a 30-year climatology (1961-1990)



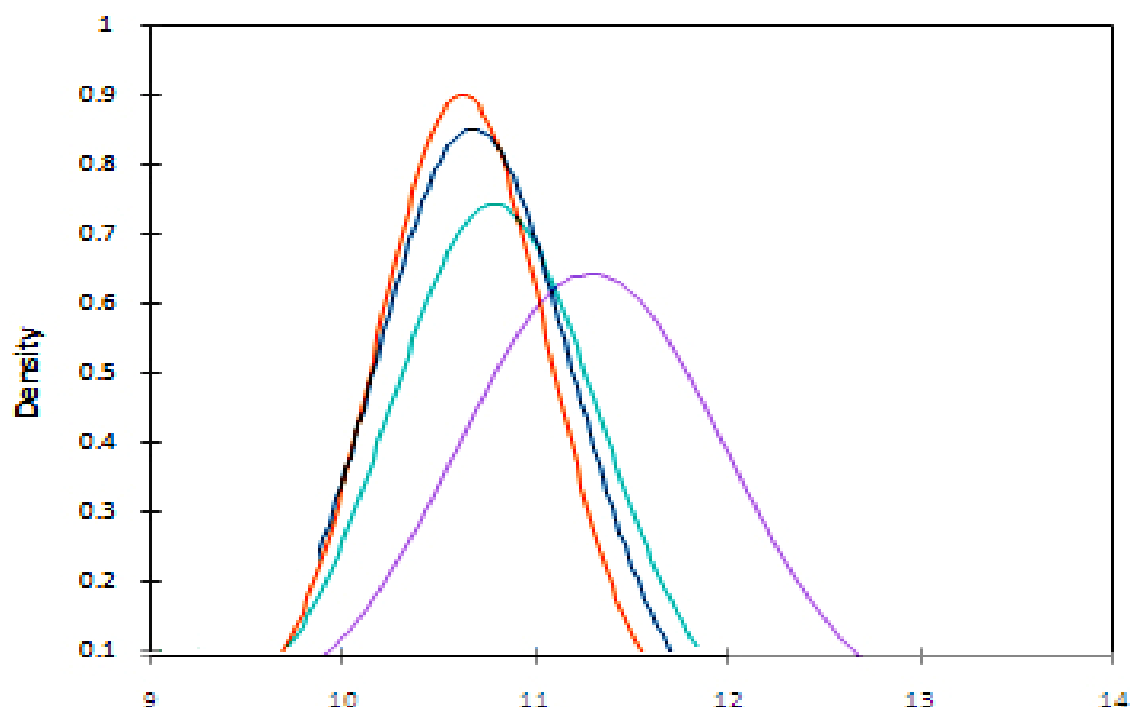
Note: For reasons of display, the chart may not show the whole time series of analysed data.
 Data collected by the Malta Airport MetOffice

The t-test between the two data groups (1951-1980 vs 1981-2010) showed a significant difference at the 95 per cent confidence level between their means.

Analysis of the data distribution for 30-year periods is shown in figure 26. In all four cases, the minimum air temperature data have a normal distribution at the 95 per cent significance level. It is interesting to note that for the first three 30-year periods, much of the shift relates to a higher variance rather than any marked changes in the means of the individual distributions. However, this is not the case for the most recent period 1981-2010, which shows an increase in both the variance and the mean.

The average temperature distribution of 10.7°C noticed during the period 1951-1980 is different from the most recent period of 1981-2010, where the frequency distribution has shifted more to the right to an average of 11.3°C. The shift in the normal distribution towards a higher temperature complements that seen in the analysis of the mean maximum temperature.

Figure 26. Distribution fitting of the annual minimum air temperature (x-axis) taken during the periods 1951-1980 (dark blue), 1961-1990 (orange), 1971-2000 (light blue) and 1981-2010 (purple)



3.2.1.1 Relevance to available national socio-economic trends

a) Fruit volume index (1995-2009)

In spite of the complexity of such an analysis, it could be suggested that the observed increased warming during the past 15 years may have influenced fruit productivity. Different crops have varying tolerance to high temperatures, humidity and other factors associated with such stress, including vulnerability to pests.

National statistics show an overall increased productivity of fruit volume which peaked in 2006. This peak may have been associated with the lowest anomaly of the mean air temperature observed in 2005 (+0.05°C) which may have resulted in lower moisture deficits, and hence more successful productivity that took place the following year.

On the other hand, 2007 registered the third highest anomaly from the climate norm (+1.1°C), which may have led to the low fruit volume index registered during the latter half of 2007.

b) Incidence of mortality and infectious diseases

England *et al.* (2010) showed that an apparent air temperature⁹ of around 27°C is an optimum average temperature at which human mortality rate is

⁹ Apparent temperature is a type of heat index used to measure the amount of discomfort during the summer months when heat and humidity often combine to make it feel hotter than it actually is.

lowest. Moreover, the authors demonstrate that at temperatures above this optimal level the daily mortality rate increases more rapidly per degree rise compared to when it drops below 27°C. The relationship between temperature and mortality is of particular relevance to the Maltese Islands in the light of the increased warming of the maximum and minimum air temperature observed since 1951. The increased incidence of high temperatures is mainly of concern to individuals with pre-existing medical conditions, due to increased susceptibility to morbidity which may lead to death.

With regard to specific diseases, Gatt and Calleja (2010) showed the incidence of one case rise in Salmonella infection per two degrees rise in minimum air temperature. The sustained positive trend of the annual minimum air temperature seen during the past years suggests a future scenario where Salmonellosis cases in the local population may increase. During the period 1990-2008, the authors identify two peaks of increased cases of local Salmonella outbreaks, namely 1999 and 2008, with a seasonal pattern that is clearly related to the warmer months of the year. In this regard, it is interesting to note that the yearly minimum air temperature in 2008 showed the highest deviation from the climate norm by +2.0°C, while 1999 showed the ninth highest anomaly up till 2010.

3.3 Trends in precipitation

Locally, periods of rainfall can range from minutes to hours (such as in the case of strong showers) up to days, while rain shortages range from weeks even to months. Extremes of rapid and strong rainfall often result in flash floods with potentially damaging consequences.

3.3.1 Time series analysis

An analysis of local rainfall data similar to that of temperature follows. These observations are based on those carried out by the Malta Airport MetOffice during the period between 1951 and 2010.

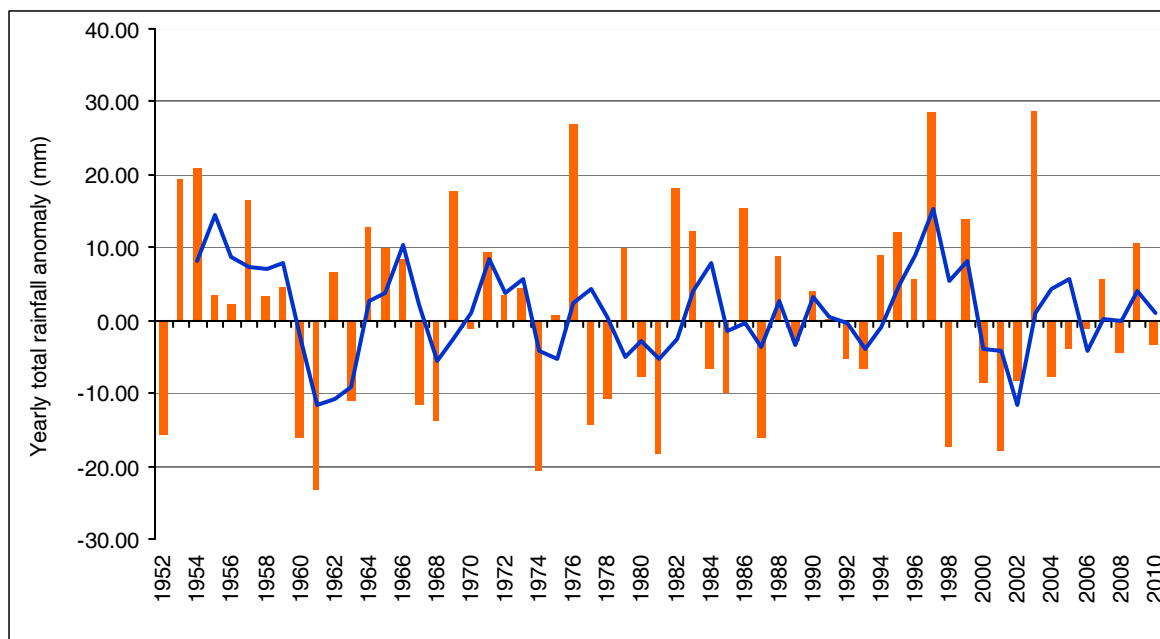
The following variables were analysed:

- total annual rainfall (indicative of periods of floods or drought);
- total 24-hour rainfall (indicative of any increased tendencies towards intense but short episodes of precipitation together with ensuing flash floods).

Figure 27 shows the annual total rainfall¹⁰ anomaly for the period 1951-2010. The Mann-Kendall test did not confirm a trend at the 99 per cent confidence level, while significance testing indicates that there is no significant difference at the 95 per cent confidence level between the means of the periods 1995-2010 and 1951-1994.

¹⁰ The annual total rainfall is the sum of the rainfall in millimetres for the twelve months of each respective year as registered at Luqa Airport.

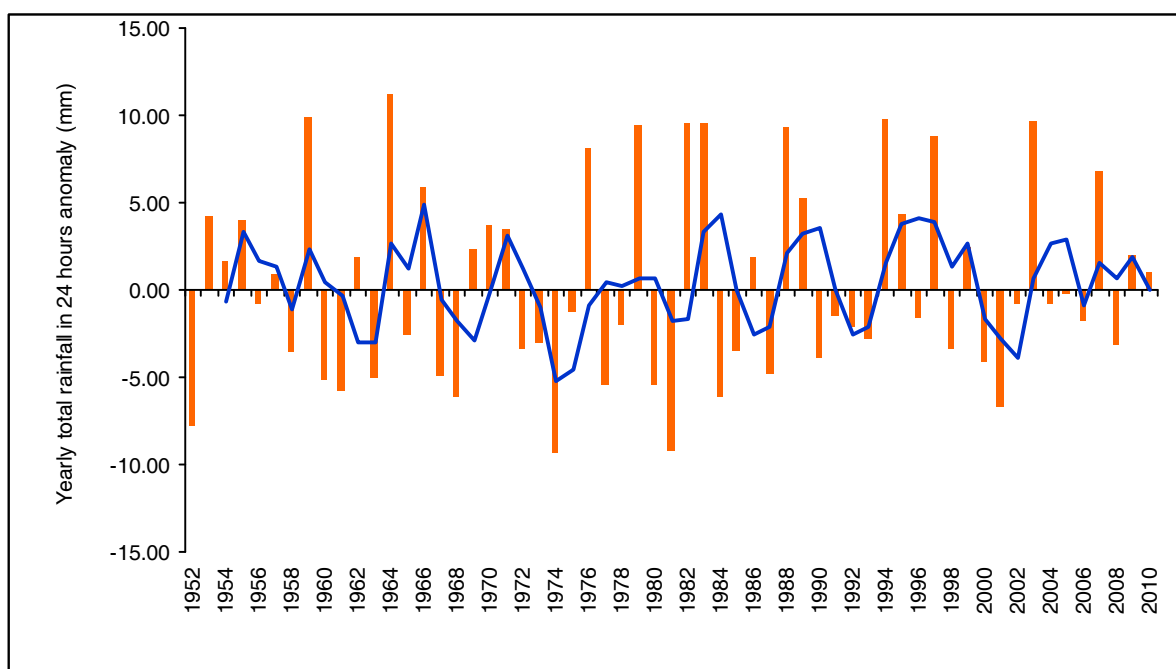
Figure 27. Annual total rainfall anomaly for the period 1951-2010
 3-year running average shown in blue
Based on a 30-year climatology (1961-1990)



Note: For reasons of display, the chart may not show the whole time series of analysed data.
 Data collected by the Malta Airport MetOffice

The departure of the total amount of rainfall recorded in 24 hours from the climate norm is shown in figure 28. The data show no significant trends at the 99 per cent confidence level, and no statistical difference at the 95 per cent confidence level between the means of the periods 1995-2010 and 1951-1994.

Figure 28. Annual total rainfall in 24 hours anomaly for the period 1951-2010
 3-year running average shown in blue
Based on a 30-year climatology (1961-1990)



Note: For reasons of display, the chart may not show the whole time series of analysed data.
 Data collected by the Malta Airport MetOffice

3.3.1.1 Relevance to national socio-economic trends

Fruit and vegetable volume indices 1995-2009

The socio-economic data available were not sufficient to test for any statistical relationship with suitable indices.

National statistics related to fruit production by volume during the period 1995-2009 provide a general idea on the yearly trends related to fruit productivity. It is expected that a primary factor that contributes to lower fruit volume is tree stress due to drought conditions (Syvertsen and Hanlon, 2008). To strive for consistently high commercial yields, local farmers must therefore incorporate strategies to minimise the negative effects of drought.

Data related to vegetable volume index do not show any levelling or decrease in productivity due to slight increase in air temperature or no increase in rainfall. On the contrary, a gradual rise in productivity from 1995 to 2008 is evident. Factors that have triggered this increased productivity include market forces and other factors such as increased water irrigation practices. A survey conducted by the NSO showed that the volume of water used for irrigation in agriculture for the agricultural year 2008/2009 amounted to 19.1 million cubic metres (NSO, 2010) mainly extracted from the aquifer by means of private boreholes.

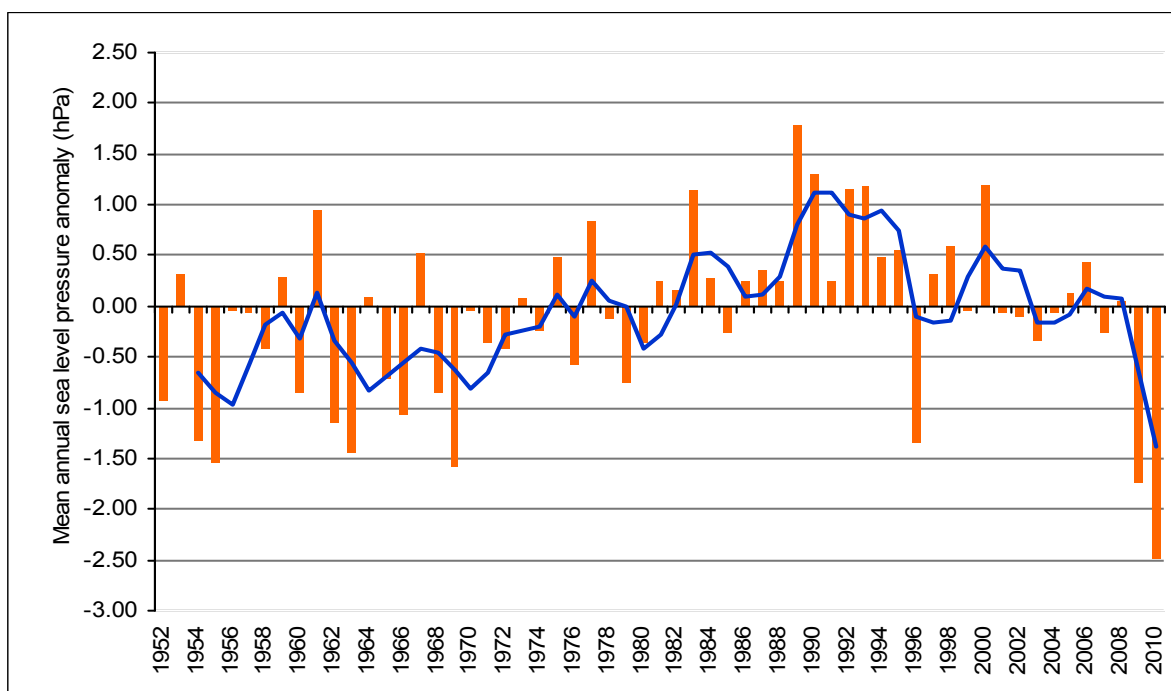
3.4 Trends in sea level pressure

Changes in air pressure can have a significant effect on the weather since it can alter rainfall, temperature, winds and degree of storminess. Gillet *et al.* (2003) shows evidence that climate change is also influencing atmospheric pressure. Data for the years 1948-1998 reveal a decreasing trend in mean atmospheric pressure at sea level over the Arctic, Antarctic and North Pacific, while pressure is increasing in areas around Southern Europe and North Africa.

Analysis of local atmospheric pressure shows an increasingly positive trend by 0.6 hPa since 1951 as registered at Luqa Airport (figure 29). This trend points towards weather that is calmer and fairer, with the possibility of an increase in ambient temperature and a lowering in humidity as a result of atmospheric air subsidence.

The Mann-Kendall test confirmed that the positive trend observed is significant with a 99 per cent confidence level. However, significance testing shows no difference at the 95 per cent confidence level between the means of the periods 1995-2010 and 1951-1994. This means that any changes during the past 15 years were not different from the previous years.

Figure 29. Annual sea level pressure anomaly for the period 1951-2010
 3-year running average shown in blue
Based on a 30-year climatology (1961-1990)



Note: For reasons of display, the chart may not show the whole time series of analysed data.
 Data collected by the Malta Airport MetOffice

Analysis shows a normal distribution of the data for the period 1951-1980 with a mean of 1,016.1 hPa, compared to an increased mean of 1,016.7 hPa shown during the period 1981-2010. Distribution fitting for all four periods (i.e. 1951-1980, 1961-1990, 1971-2000, and 1981-2010) shows a small change in variance together with a shift towards an increased mean air pressure. This means there are fewer days with lower air pressures and a higher probability that previous record highs will be exceeded.

3.4.1 Relevance to economic and social trends

a) Total fish landings by volume 1995-2009

Sustained high pressure system coupled with a reduction in storms is beneficial for fishing and general marine activities. Owners of fishing boats need not abandon their fishing trips in fairer weather, resulting in bigger overall catches.

NSO data show that the trend in fish catches by volume¹¹ during the period 1995-2009 has increased from just above 800 to almost 1,000 tonnes. Apart from improved weather conditions, such a trend could also have been influenced by other factors (such as direct financial assistance to fishermen, and an increased demand) which may be masking the subtle trends due to climate.

¹¹ Fish volume refers to the fish landings which pass through the official market.

b) Irregular immigration 2002-2009

Calm seas and longer daylight promote waves of irregular immigrants and refugees from the North African coast in hope of gaining a foothold in European countries. Refugees from the sub-Saharan continent have been using this window of opportunity to pour onto overcrowded, barely sea-worthy boats as they attempt to reach European shores.

National statistics on the arrival of these migrants show that during the period 2003-2009 the lowest number of arrivals in terms of both people and boats was in 2003. On the other hand, 2008 was the peak year in arrivals with 84 boats carrying 2,775 migrants. By 2009 arrivals dropped to 17 boats carrying 1,475 people.

These figures show no correspondence with annual climatic fluctuations; nevertheless, on a monthly basis, a good correlation between irregular immigrant arrivals and summer months exists. In 2008 and 2009 arrivals were also registered in winter months. Such arrivals are possibly motivated by a period of fair weather which would make seafaring conditions ideal. However since various factors influence the pattern of illegal immigration, it is difficult to isolate climatic factors from political and other socio-economic factors¹².

3.5 Trends in wind behaviour

3.5.1 Trends in frequency of days with gale winds

A negative trend is seen in the incidence of days with gale-force winds (figure 30). The Mann-Kendall test confirmed that the negative trend observed is significant with a 99 per cent confidence level. These results could reflect a decreasing occurrence of stormy weather over Maltese territorial waters.

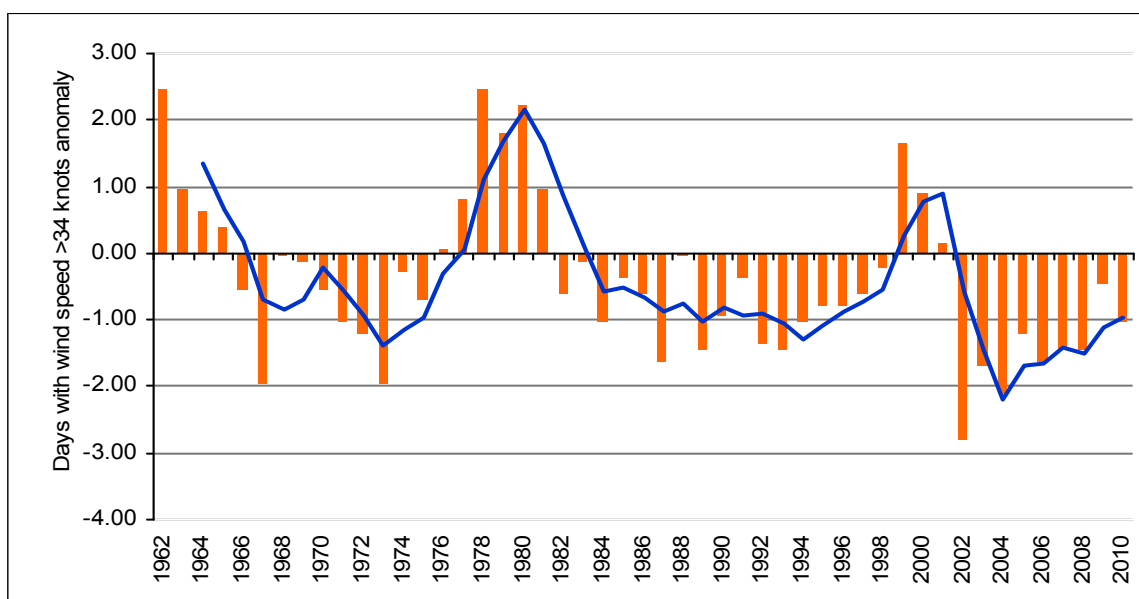
Although this trend is based on observations made on the ground at Luqa Airport, wind speeds over the sea approximate two-thirds of the geostrophic wind¹³ speed, meaning that winds over the sea are stronger due to reduced friction and zero topography.

Statistical significance testing shows that there is no significant difference at the 95 per cent confidence level between the means of the periods 1995-2010 and 1961-1994.

¹² An example of such influence is an agreement reached in 2009 between Libya and Italy which has drastically reduced the flow of migrants to Malta.

¹³ The geostrophic wind is directed parallel to lines of constant pressure at a given height. This is different from the true wind which is the final wind speed close to the earth's surface. The true wind equals the geostrophic wind only if there were no friction and the isobars were perfectly straight.

Figure 30. Number of days with winds ≥ 34 knots anomaly for the period 1961-2010
 3-year running average shown in blue
Based on a 30-year climatology (1961-1990)



Note: For reasons of display, the chart may not show the whole time series of analysed data.
 Data collected by the Malta Airport MetOffice

3.5.2 Relevance to national socio-economic trends

Total fish landings by volume 1995-2009

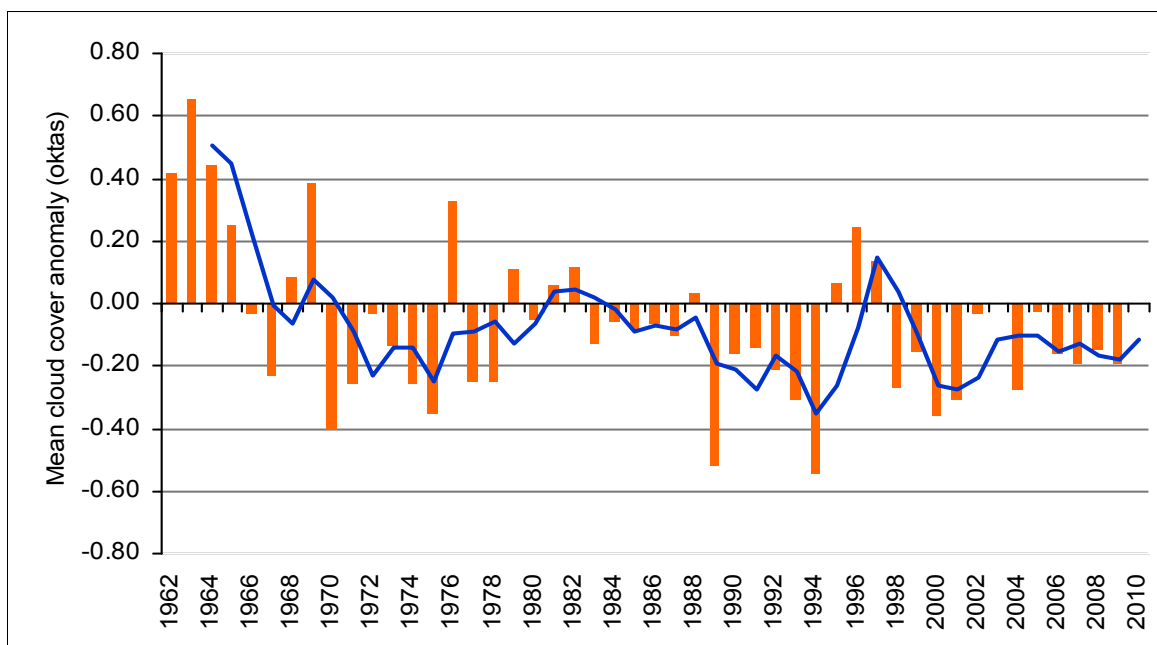
Official data on fish catches (all items) by volume for the period 1995-2009 show a rising trend that starts to increase considerably from 2003 onwards. In figure 30, a consistently negative anomaly in the number of days with wind speed greater than 34 knots from 2001 onwards is evident. This may point towards calmer seas that could have assisted more fish landings in the local fish markets.

3.6 Trends in cloud cover

One of the biggest questions in climate sensitivity is the role of cloud cover. Clouds reflect some of the sun's radiation back into the atmosphere, and thus have the ability to cool the earth.

Over Luqa Airport a negative tendency is noticeable in figure 31 but the Mann-Kendall test did not show any significant change at the 99 per cent confidence level. In addition, no statistically significant difference at the 95 per cent confidence level exists between the means of the periods 1995-2010 and 1961-1994.

Figure 31. Mean annual cloud cover anomaly (in oktas) for the period 1961-2010
 3-year running average shown in blue
Based on a 30-year climatology (1961-1990)



Note: For reasons of display, the chart may not show the whole time series of analysed data.
 Data collected by the Malta Airport MetOffice

3.6.1 Relevance to national socio-economic trends

Solar radiation and photovoltaics

Although no significant trends are seen in the observed cloud cover, it is technically possible to suppose that a decrease in cloud cover would have a beneficial effect on the amount of electricity generated by photovoltaic cells. Photovoltaic solar panels are inefficient in low sun and cloudy conditions, and typically the output of any industrial module is reduced to 5-20 per cent of its full potential when it operates under such conditions. On a national level no statistical data are available concerning the electricity generation from such modules, mainly since the market share of photovoltaics in Malta is still of a limited nature.

4.0 REMARKS

The first part of this publication shows Malta's climate norm for a number of weather elements, which should constitute official reference information for anyone who is interested in the climate of the Maltese Islands for local or comparative studies. The second part illustrates how a number of weather elements have shown stability or fluctuation when compared to this norm. Therefore there is a logical binding between the two parts of this document.

While certain weather elements show clear signs of departures from Malta's climate norm, other indicators show no such clear sign with time.

These weather elements were chosen on the basis of our perception of climate. For some of these elements, an upward trend in the annual series is clearly evident. Specific elements are included so as to capture possible changes in the atmospheric circulation which might occur in response to this warming trend. They involve comparing year-to-year changes in the amount of rainfall, atmospheric pressure, degree of storminess, as well as cloud cover.

The behaviour of these elements in future years bears careful watching. Will they maintain current trends, thus demonstrating that the impacts of climate change are a reality in the Maltese Islands? Or will they revert to earlier conditions, suggesting that any trends were simply random behaviour or natural variability?

The linkage between these changing elements and the available socio-economic data is not straightforward. The linkage between weather or climate effect and a selected number of socio-economic trends represented in Appendix 1 could be unrelated, which instead might be more influenced by market or political factors. This highlights the necessity for more specialised work in order to produce specific socio-economic indices that could be linked to a changing climate.

4.1 Discontinuities in climate trends

This document identifies a number of discontinuities in the trends of various weather elements. Such discontinuities occur at a change-point when the sequence of values stops sharing a statistical distribution evident in previous years. The most common change-point involves a discontinuity in the mean. However, other 'external' factors can contribute to discontinuities in climate-related time series, such as the movement of weather station location, or changes in type of instrumentation or recording practices. These factors must be considered in any climate analysis.

Another aspect could be the effect of urbanisation change patterns around Luqa Airport on the local climate. The most noticeable change since 1951 is the gradual replacement of rural and agricultural areas with new urban settlements. Concrete and asphalt heat-up during the day cool only slowly at night¹⁴. Buildings and structures also change the ground-level wind flow and create eddies. However, the impact that encroaching urbanisation has on our local meteorological variables such as ambient temperature is hard to quantify.

¹⁴ The urban heat island effect is the increased rise in temperature of urbanised areas, resulting in a well-defined, distinct "warm island" among the "cool sea" represented by the lower temperature of the area's nearby natural landscape. Though heat islands may form on any rural or urban area, and at any spatial scale, urbanised areas are more likely to give rise to heat islands, since their surfaces are prone to release large quantities of heat. Increased temperature from some small urban areas is partly the result of this effect. At the same time this is not evidence that climate has remained unchanged.

Undoubtedly more research is needed to ensure that apparent significant changes are truly a real part of the larger climate. Identifying additional sites for climate monitoring is highly advisable in this case.

4.2 Statistical analysis of climate data

The statistical techniques applied in this document are widely used for climate studies, essentially to characterise the level (central tendency) and variability of climate variables. The results of these statistical techniques are used for various purposes such as assessing linear relationships (including trends), and for identifying discontinuities and extreme events. In this way a scientific approach towards determining the extent of climate change is applied.

During the entire observation period data “outliers” may arise due to a number of reasons including instrumental malfunction or faulty logic in data processing, communication errors (such as truncation of a digit or transposition of digits), etc. This document makes use of annual means which are ultimately based on sub-daily observations. Apart from flagging of individual outlier observations, the compilation of annual means significantly smoothens out any resultant contaminated data.

4.3 Future research

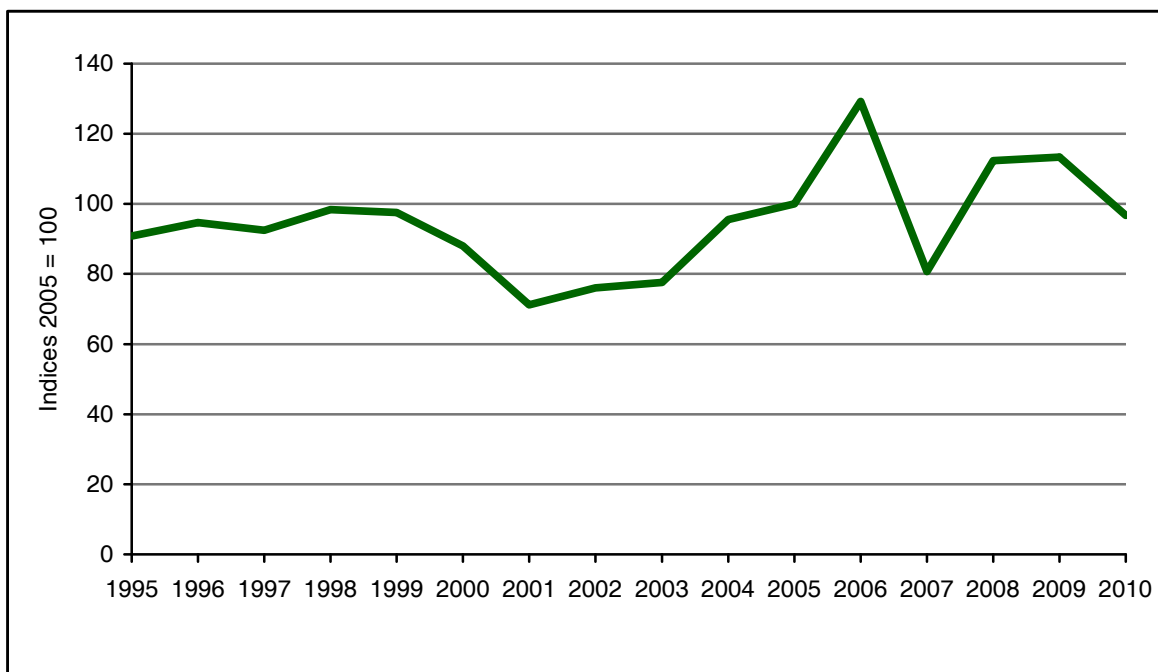
At a national level, this publication is a first to attempt the correlation of weather elements with a number of socio-economic indices. Among other things, it motivates the need to expand this study by applying a number of additional, well-proven indices that could provide valuable information on the link between a changing climate and the economy. Just to name a few, the crop moisture and drought severity indices (Aigup *et al.*, 2004) are now being used internationally to reflect the influence of severe drought and catastrophic wetness on annual crop yield for certain crop types. The Residential Energy Demand Temperature Index is another useful indicator that can provide quantitative information on the impact of seasonal temperatures on residential energy demands.

Further research could be directed to specific economic sectors that could be affected by climate change, such as the development of an Airport Weather Index that will quantify the impact of weather on aircraft takeoffs and landings due to factors such as convective storms, reduced visibility, low cloud levels and precipitation. Other indices could be developed to quantify the effect of meteorological conditions on the construction, tourism and transportation sectors, as well as an index that reflects conditions conducive to vector-borne infectious diseases. Research efforts will require close collaboration with experts in related fields and the complexity of the relationships between climatic parameters and the associated sector will, in some cases, require lengthy study periods.

Appendix 1

Figure A1. Fruit volume (all items) index 1995-2010

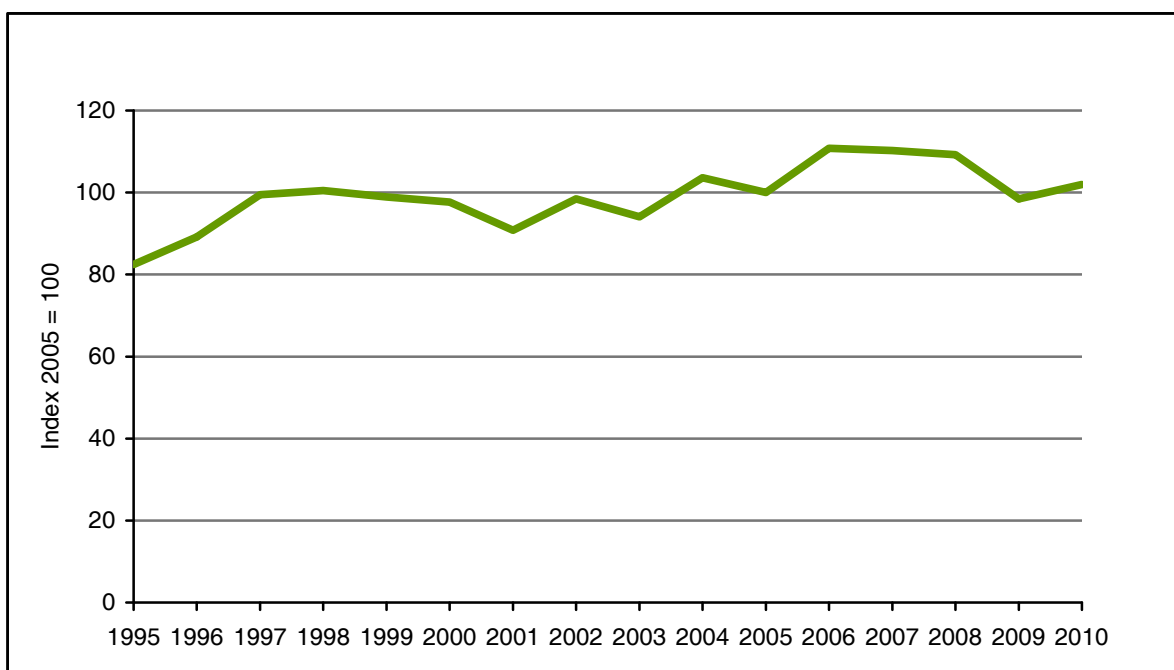
(Based on data about fruit produce which passes through the official market)



Data compiled by the National Statistics Office

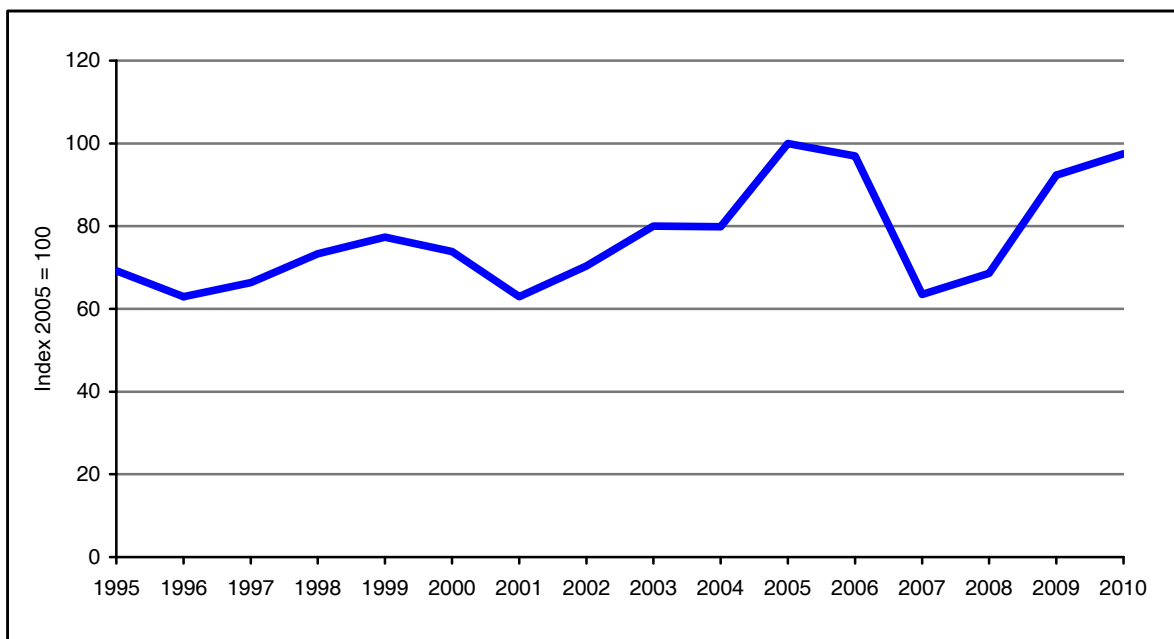
Figure A2. Vegetable volume (all items) index 1995-2010

(Based on data about vegetable produce which passes through the official market)



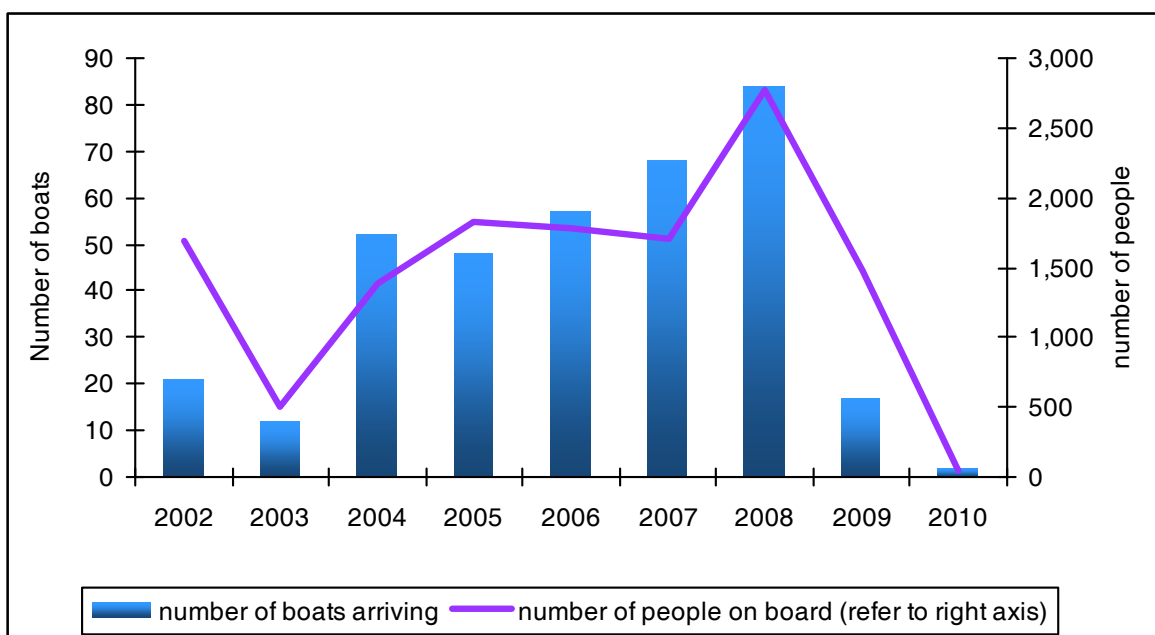
Data compiled by the National Statistics Office

Figure A3. Total fish landings (all items) by volume 1995-2010
(Based on data about the fish catch passing through the official market)



Data compiled by the National Statistics Office

Figure A4. Irregular immigrant arrivals 2002-2009



Data collected by the Police General Headquarters – Immigration Section

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