

## **RESPONSE TO CONSULTATION COMMENTS**

### **STRATEGIC ENVIRONMENTAL ASSESSMENT ON THE SOLID WASTE STRATEGY FOR THE MALTESE ISLANDS: CONSULTATION DOCUMENT JANUARY 2009**

**VERSION DATED: SEPTEMBER 2009**

## **RESPONSE TO MEPA COMMENTS**

**Comments from MEPA on the  
Environmental Report (1<sup>st</sup> Draft) for  
the Solid Waste Strategy for the Maltese Islands: Consultation Document January 2009**

<b>Page/ Para</b>	<b>Comment</b>	<b>Adi Response</b>
General Comments	<p>Main criticism is that a separate Waste Management Plan is also being prepared in parallel with the strategy. The plan is a requirement of the Waste Framework Directive. The two documents need to be merged.</p> <p>Strategy is not holistic and does not tackle all the issues – packaging, direction away from land fill, etc. A number of related EU Directives have been omitted.</p> <p>Locations for waste facilities appear premature as MEPA was not involved in any site selection.</p> <p>SEA is rather weak on assessment of technologies. It only considers landfill, MBT, and incineration and proposes MBT and incineration as feasible technologies.</p> <p>SEA concludes strategy is legislatively compliant and no major environmental impact will result. These conclusions are based on too many uncertainties.</p> <p>SEA needs to assess the alternative locations as strategy did mention specific locations either directly or indirectly as “sites preferred by Government”.</p>	<p>Comments on the strategy will be forwarded to the plan proponent. It should be noted that the strategy is currently being revised to address the SEA findings as well as comments received during public consultation.</p> <p>The SEA assesses technologies considered in the Waste Strategy. It is beyond the scope to assess every waste technology that exists from an environmental point of view unless these are also being considered from a technical and feasibility point of view within the strategy.</p> <p>The SEA can only assess the Strategy as presented. As identified in the SEA, the Strategy requires updating in order to improve certainty with regards to implementation.</p> <p>SEA is a strategic assessment and its scope does not include assessment of sites. Site selection exercises will be carried out for the various proposed facilities. At this stage, only one site has been earmarked for the potential development of an additional waste management facility, namely the Ghallis site. This site has been identified because it is already permitted for waste management activities.</p>
<b>Non-Technical Summary</b>		
General Comment	The non technical summary should be a standalone document, providing a concise but comprehensive description of the environmental report. It provides a description of the contents of the environmental report and does not portray a summary of the main	Noted. Please see amended version.

		findings of the environmental report.	
		No reference is made in the non technical summary to the consultations undertaken as part of the SEA.	Noted. Please see amended version.
		What are the principle effects on the environment likely to arise from the adoption of the Solid Waste Management Strategy?	Please see amended version that summarises SEA findings.
		Which are the cumulative effects likely to arise from this plan?	Please see amended version that summarises SEA findings.
1	3	How can 'lack of reference to targets' mean that the impacts of the WMS cannot be easily identified? How can there be no reference to targets in such a strategy? Kindly clarify.	The SEA recommends that targets should be included in the final version of the Strategy to allow monitoring results to be used to identify relative success of implementation as well as environmental impacts that may be associated both with implementation and lack of implementation (e.g. if targets within the Strategy are not reached, what are the environmental impacts associated from waste that is not managed in accordance with waste management principles that the Strategy seeks to adopt?)
	4	The non technical summary should provide a brief overview of the main alternatives considered in the environmental report. This should be included in the non technical summary.	Noted. Please see amended version.
1	4	What is Option 3? Why was option 3 considered as the best alternative. This should be included in the Non-Technical Summary.	Please see amended version that summarises SEA findings.
	6	The text states that 'more detail is required with respect to a number of proposed actions and aspects'. Which details are required in this case? Kindly provide clarification in this regard.	Please see amended version that summarises SEA findings.
<b>Chapter 2</b>			
8	17	The WMS 2009 should be considered as a stand-alone document rather than being a revision of a previous document (i.e. the 2001 WMS) and thus should be a complete document which does not constantly refer to a plan compiled 8 years prior. This should also be considered in the assessment of the environmental implications/effects related to the plan itself.	The SEA makes this same recommendation for the updated Strategy in para 20.
10	26	What kinds of difficulties were encountered, considering that data re: waste streams and waste arisings should be readily available through Wasteserv Malta and the NSO? Kindly clarify.	This paragraph describes the drawing up of the Waste Management Plan in 2000 not the preparation of the Waste Strategy or this SEA.
<b>Chapter 4</b>			
General		Tables, graphs, charts etc. that are part of the baseline data should	In our opinion, the document reads better as is.

Comments		be in the Appendix.	
20	59 – 62, Figure 4.1 – 4.5	It should be noted that the updated GHG Inventory for Malta, covering time series 1990 to 2007 has been uploaded on EIONET as per EU obligations on 13th March 2009. This is the link to the latest inventory data as Excel sheets, as well as the availability of the National Inventory Report, where the SEA team may wish to refer to these documents for the latest updated data and information: <a href="http://cdr.eionet.europa.eu/mt/eu/ghgmm/envsbq7xq">http://cdr.eionet.europa.eu/mt/eu/ghgmm/envsbq7xq</a> .	Noted. Environmental report updated.
22	61	In terms of greenhouse gases GWP, a 100-years time horizon has been chosen by UNFCCC and the Kyoto Protocol. Throughout the SEA, a GWP of 21 for methane (100 years) should be used for consistency.	Noted. Environmental report updated.
25	66	This paragraph needs to be updated, given that Malta does have a GHG emission limitation target for non-ETS sectors under the new Effort Sharing Decision (as part of the CC-Energy package agreed in December 2008), so targets for Malta are not “a possibility” but a reality.	Noted. Environmental report updated.
26	67	The first sentence is not correct – GHG emissions from the commercial/institutional category are on a par with emission from manufacturing industries.	This paragraph deals with energy consumption.
26, 28	69, 72	A draft Energy Policy for Malta has been issued in April 2009, thus superceding the 2006 document quoted hereby in the text. Has the SEA taken this into consideration?	The SEA was issued in April 2009. An addendum can make reference to the draft Energy Policy.
31	77	Can these designated sites be specified?	Kindly refer to Figure 4.11.
77	159	The SEA appears to limit the evaluation of the strategy regarding the indicator “Reducing Non-Renewable Energy Consumption and Green House Gas Emissions” primarily to energy-related emissions, and does not assess whether the implementation of the strategy (or certain aspects / proposals) will reduce / limit overall emissions from the waste sector as opposed to a ‘do nothing / business as usual’ scenario / alternative options.	Chapter 7 assesses the alternative technologies presented in the Strategy, including the do nothing option (base case). The assessment looks at impacts on all environmental aspects as identified in the Directive, including on air quality. Refer to Table 5.1 for the full list of SEA objectives on which the assessment is based, in particular, SEA objective 9, which specifically addresses air quality.
<b>Chapter 7</b>			
/	/	Assessment of alternatives is considered as being insufficient, as not all possible alternatives have been taken into consideration, e.g. gasification.	As described above, the SEA can only assess alternatives considered in the Strategy. If an alternative has not been considered by the Strategy Proponent then the SEA cannot make up alternatives – the list would be never ending and

			unrealistic.
81	Table 7.1	<p>What is the basis of the assessment of the various options vis-à-vis the objective “reduce non-renewable energy consumption and GHG emissions”? - Have the GHG emissions from the various options been quantitatively assessed, taking into account GHG emissions from waste disposal, GHG emissions from the various treatment options (e.g. biogas generation and combustion) and indirect GHG emissions such as due to electricity use? If not, it is not possible to ascertain that option 1 (assuming collection and recovery of methane generated in the landfill) will have a negative impact, whereas the other 3 options, including incineration of RDF, will have a positive impact.</p> <p>(Note: a review of the section “Evaluation of Alternatives” does not provide further information in this regard.)</p> <p>Also, for Malta’s case it may make more sense to assess whether each option has a diffuse / localised dimension rather than a ‘transboundary’ dimension (which in fact none of the options have been assessed to have).</p>	<p>A quantitative assessment has not been carried out at this stage given that the Strategy does not specify the quantity of waste streams that will be directed away from landfill to proposed facilities. This will have a major bearing on significance of potential impacts. The assessment does, however, consider relative technological aspects. Option 1 is the base case, and it involves continued reliance on landfill. It should be noted that the positive impacts identified under the other 3 options are considered <i>relative</i> to the base case (and each other) and in general it can be concluded that there is likely to be a reduction in GHG emissions by treating biodegradable MSW fractions separately. However, as identified here and mentioned in the SEA, the significance of any improvement over landfill will depend on the quantity of relevant waste directed away from landfill.</p> <p>We do not understand this comment.</p>
82	174 – 180 Option 1	<p>“<i>Disposal of mixed MSW to landfill generates methane gas from the breakdown of the biodegradable fraction in anaerobic conditions. Whilst some of this can be captured, fugitive emissions from landfill are common.</i>” (para. 177)</p> <p>Such a statement needs to be referenced / quantified, especially since it is assumed that the baseline option deals with an engineered landfill that is compliant with the relevant EU Directives (LFD, IPPC) and that hence, landfill gas generated would be collected and flared / combusted for energy generation.</p> <p>This option makes no reference to the energy generation potential from landfill gas collection and combustion; hence, subsequent comparisons highlighting the energy generation potential of the other options vis-à-vis the base option (1) are flawed.</p>	<p>The EIA prepared for the Ghallis Waste Management Facility (the engineered landfill) states that energy recovery will occur if feasible. Therefore, at this stage it is not possible to quantify this. The current, i.e. baseline, situation is that energy generation is not happening at Zwejra.</p>
83	181 –	The assessment does not assess the GHG emissions from this	Quantification can only be carried out once the

	186 Option 2	option (for comparison with the base option's GHG emissions); there is no quantification of the GHG emissions from the production and combustion of biogas and the production of compost from the organic fraction of waste at the MBT. This option is not carbon neutral, and it should be noted that the various emissions associated with this option will be reported as part of the national GHG emissions inventory.	capacity and the exact type of MBT to be used has been identified.
83	186	Transport impacts have been identified as uncertain. Are there any assumptions which could help to predict the impacts?	With the information presented, nothing further can be added here.
84	194	Transport impacts have been identified as uncertain. Are there any assumptions which could help to predict the impacts?	With the information presented, nothing further can be added here.
84	187 – 194 Option 3	Same comments as for option 2 apply, in addition to the need to quantify GHG emissions from the incineration process.  Given the lack of quantitative data it is not possible to state whether this option will result in less/more overall GHG emissions, compared to the baseline option.	See comments above.
84	195 – 197 Option 4	<i>“As a chosen technology, however, incineration is lower down in the waste hierarchy than measures for minimisation, re-reuse, and recycling. Recovery of materials to replace use of virgin materials is also relatively limited <b>and it is not as effective in reducing greenhouse gas emissions as MBT.</b>”</i> (para 196)  Kindly provide with quantitative estimates for GHG emissions / reduction from MBT, or for this option (incineration).	Quantification can only be provided once capacity of facility is known.
85	199	The SEA has identified Option 3 as the best alternative. Why was Option 3 preferred upon Option 2, if Option 3 involves incineration and therefore air emissions are likely to be an issue under this Option?	Option 3 was considered preferable over Option 2 because Option 3 avoids the exportation and/or landfill of RDF that will likely be generated by the MBT. Exportation of RDF as part of Option 2 goes against the Proximity Principle, one of the underlying principles of waste management and landfilling of RDF goes against the waste management hierarchy. Air emissions will be an issue if they are not controlled.
85	199	What further details are required in this regard? Kindly clarify.	As identified throughout, one of the most important aspects that will help identify overall whether the Strategy will result in significant environmental improvement to the baseline situation is capacity of

			chosen waste management facilities. Further details on technologies chosen (as there are numerous types of MBT plants) would also help inform the assessment. However, it should also be recognised that this is a strategic document and therefore a degree of uncertainty is to be expected. Moreover, such details are likely to be available at a lower level in the plan/programme/project hierarchy.
116	207	It is unacceptable that an assessment identifies impacts as being uncertain because 'insufficient clarity on implementation measures/targets and timetables are included in the WMS'. Such information should be provided at this stage so as to provide an informed assessment and thus feed into the plan accordingly.	It is not unacceptable for the assessment to identify this. However, comments are noted. This must be addressed by the revised Strategy.
117	Table 8.3	The overall summary for the objective "Reduce non-renewable energy consumption and GHG emissions" refers to the priority given in the WMS to the development of waste-to-energy technologies; however, as indicated previously, the GHG emissions from the various waste disposal options, and from the WMS overall, have not been quantified and hence it is not possible to conclude what the overall impact will be. It should also be noted that although waste-to-energy technologies (including the combustion of landfill gas for energy recovery) will reduce GHG emissions from the waste sector, they will increase emissions in the Energy sector, as reported in the national GHG emissions inventory.	See comments above.

**RESPONSE TO WASTESERV COMMENTS**

**Comments from WasteServ on the  
Environmental Report (1<sup>st</sup> Draft) for  
the Solid Waste Strategy for the Maltese Islands: Consultation Document January 2009**

<b>Page/ Para</b>		<b>Comment</b>	<b>Adi Response</b>
General Comments		Overall WasteServ Malta Ltd. considers the SEA to be quite comprehensive and well-explained. However it must be pointed out that the updated WMS is intentionally at a high level, and was not intended to include detailed targets, but rather to indicate policy and give direction. It is our understanding that the Ministry for Resources and Rural Affairs intends to detail targets to the detail required by the SEA in a subsequent action plan which would also take stock of the progress made on the targets set out in 2001.	<p>As stated in the WMS itself, this document is intended to update the 'Solid Waste Management Strategy for the Maltese Islands' published by Government in 2001. The 2001 Strategy sets out waste management policies and also includes targets where possible (at a strategic level e.g. target to reduce amount of biodegradable waste going to landfill). The SEA assumes that the draft 2009 WMS would and should include the same level of detail as the 2001 strategy. The SEA also notes that the 2009 should be a stand-alone document i.e. it should not be necessary for the reader to refer to the 2001 Strategy (the targets of which should, in any case, also be updated) when reading/reviewing the 2009 document.</p> <p>Of course, the WMS also discusses some issues that will require further studies and/or specific action plans and the SEA recognises that targets can therefore only be assigned at a later date.</p>
<b>Chapter 2</b>			
6	Table 2.1	The SEA seems to have its numbers wrong regarding biodegradable waste sent to landfill in 2007. 245 Tonnes is <u>all</u> the waste deposited to landfill, not just the biodegradable waste.	Noted. Table amended.
<b>Chapter 7</b>			
83	183	In the absence of a thermal treatment plant to treat RDF from MBTs (option 2) this fraction is more likely to be landfilled rather than exported.	The strategy proponent indicated that RDF would likely be exported. To confirm.
<b>Appendix 2</b>			
/	/	Contrary to what the SEA suggests, Action 25 regarding the introduction of fiscal incentives for companies involved in recycling has already been implemented through the updated Malta Enterprise	It should be noted that Appendix 2 summarises the WMS to facilitate assessment (and was approved by plan proponent as being a correct interpretation).

		<p>Act early. Commercial Waste Treatment activities are in fact eligible for 30-50% tax credit (depending on the size of the company) on any capital investment expenditure incurred. The definition of waste treatment according to the guidelines under the Investment Aid Regulations (LN68 of 2008) is the following: <i>“Waste treatment” means physical, thermal chemical or biological processes, including sorting, which change the characteristics of the waste in order to reduce its volume or hazardous nature, facilitate its handling or enhance recovery, and shall include waste management.</i> Links to the text of both LN68 of 2008 and the relevant guidelines can be found at:  <a href="http://support.maltaenterprise.com/index_files/TaxCredits.htm">http://support.maltaenterprise.com/index_files/TaxCredits.htm</a>.</p>	<p>Action 25 is taken directly from the WMS (see page 21 under ‘Incentives for locally manufactured recycled products/recycling processes’). This comment will be addressed in the amended WMS.</p>
/	/	<p>WasteServ Malta Ltd. agrees with the SEA’s assumptions regarding the allocation of <i>its</i> responsibilities for the Actions <i>not</i> listed below. On the other Actions the company wishes to make the following comments:</p> <p><b><u>Action 1 (Continue to implement the system of kerb-side separation at source)</u></b>  WasteServ’s indicated responsibility is questionable here given the imminent implementation of the Authorised Collection Schemes. WasteServ was never actually responsible for kerb-side collection even though as handlers of the collected waste the company has an interest in the collection methodology. The SEA needs to distinguish between collection and treatment responsibilities.</p> <p><b><u>Action 4 (Solid waste and liquid waste facilities for maritime industry to be set up)</u></b>  WasteServ’s responsibility should only extend in as far as the treatment process of such waste or its disposal thereof. Such waste should be transported to facilities operated by WasteServ by the producer in accordance with any procedures set out by MEPA.</p> <p><b><u>Action 5 (A plan will be drawn up to manage maritime burnt oil)</u></b>  As per Action 4 above.</p> <p><b><u>Action 9 (To release sector based topic papers)</u></b>  WasteServ should be consulted for its contribution and</p>	<p>Noted.</p>

	<p>recommendations when such topic papers are released.</p> <p><b><u>Action 10 (Site selection process for waste management facilities)</u></b>  WasteServ, as the developer of the facilities, may be required by MEPA to commission site selection exercises for the proposed developments as part of the Environmental Impact Assessment process.</p> <p><b><u>Action 14 (Sectoral review of the role of WasteServ Malta Ltd.)</u></b>  This would naturally involve substantial data collection and input from WasteServ and the company would need to plan and allocate resources accordingly.</p> <p><b><u>Action 16 (Implementation of new waste collection contracts)</u></b>  Waste collection contracts are not administered by WasteServ and the company should not be the principal role player here but can give recommendations and inputs as required.</p> <p><b><u>Action 17 (Review of cost recovery)</u></b>  The SEA should note that this process started in September 2008 with recommendations made to MRRA and MFEI in October 2008 prior to the budget for year 2009. A revised Legal Notice (still awaiting publication) had also been prepared by WasteServ in this regard.</p> <p><b><u>Action 18 (Charges and incentives for Local Councils)</u></b>  As per Action 17 above.</p> <p><b><u>Action 19 (500 new bring in sites)</u></b>  The WMS envisages that responsibility for the creation and management of bring-in sites will be transferred to Local Councils. WasteServ can procure equipment but management and collection will not remain the company's responsibility.</p> <p><b><u>Action 23 (Introduction of licensed schemes for waste disposal)</u></b>  Although WasteServ agrees responsibility for this action lies with the Government (and implemented by MEPA), the company should play a consultative role.</p>	
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	<p><b><u>Action 31</u></b> (To introduce MBT plants in Malta and Gozo)</p> <p>WasteServ Malta Ltd. is not included as responsible or co-responsible for this action when the company will be the main implementer of this action.</p> <p><b><u>Action 33</u></b> (Government intends to consult on legislation to favour further source separation of waste)</p> <p>Wasteserv can play an important role on operational requirements and recommendations in respect of the quality of the input waste streams required for its treatment plants.</p> <p><b><u>Action 41</u></b> (Increase independence in dealing with waste)</p> <p>This action is being presently led by WasteServ and a deployment programme with target dates is already available.</p> <p><b><u>Action 42</u></b> (Abattoir incinerator to continue to be used for animal, clinical and certain other hazardous waste)</p> <p>WasteServ will assume responsibility of this plant once this is fully commissioned by the contractor. It presently is being commissioned for the liquid waste fractions and is expected to be formally handed over to WasteServ later this year.</p> <p><b><u>Action 43</u></b> (Better management of port and airport related waste)</p> <p>As per Action 4 above.</p> <p><b><u>Action 44</u></b> (<i>Better management of asbestos waste</i>)</p> <p>Wasteserv currently handles the collection and export of asbestos waste generated by households through the Civic Amenity sites. Industrial asbestos waste should be directly managed and organised by the producer following any requirements and procedures set out by MEPA.</p>	
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**RESPONSE TO SEA AUDIT TEAM COMMENTS**

**Comments from the SEA Audit Team on the  
Environmental Report (1<sup>st</sup> Draft) for  
the Solid Waste Strategy for the Maltese Islands: Consultation Document January 2009**

<b>Comment</b>	<b>Adi Response</b>
<p>The SEA Audit Team also suggests that the revised Environmental Report will summarise the inputs received from (a) consulted stakeholders (b) consultation sessions (c) media and to show how these were integrated into the report through a separate statement that would form part of the preamble to the revised report.</p>	<p>The Environmental Report will include an Addendum with comments received on the Environmental Report and how the SEA team has addressed these comments. Comments received on the Strategy will be addressed by the Strategy.</p>
<p>In the options analysis it is suggested to have (a) the do nothing scenario mentioned and addressed specifically (b) a waste minimisation strategy taken into account. The Options Analysis should be supplemented by a certain level of statistics and projections which also contributes towards justifying the proposed recommendations.</p>	<p>Please refer to Chapter 7 for assessment of alternatives, which includes the do nothing option. It should be noted that it is the role of the Strategy to consider technical alternatives, the SEA then assesses the environmental impacts arising from alternatives considered during the development of the Strategy. It is beyond the scope of the SEA to consider all potential alternatives in the waste management sector if these are not contemplated in the Strategy.</p>
<p>Recommendations should not be limited to what should be added but also to what should be retained.</p>	<p>Recommendations are linked to ways in which positive environmental impacts can be enhanced and any negative impacts can be mitigated as far as possible by building on what is already in the Strategy.</p>
<p>In terms of Monitoring, ideally current baselines (national and site specific) would be quantified so as to establish certain tolerances for incremental changes to such parameters. Moreover it is suggested that the report provides a clear indication of which are the critical parameters to be monitored in the implementation phase and what is their current baseline at a national and local level.</p>	<p>Refer to Chapter 4 for strategic environmental baseline description. Establishment of site specific baselines is not within the scope of SEA. Limitations of data are outlined on page 17.</p> <p>Chapter 9 provides a proposed monitoring plan for monitoring environmental impacts that may arise from the implementation of the Strategy. Chapter 9 explains that guidance documents propose that SEA monitoring (i.e. monitoring of environmental impacts) could be implemented into the monitoring framework for the Strategy. In the absence of a monitoring framework included within the Strategy itself, the SEA proposes a monitoring plan that identifies environmental aspects that should be monitored in</p>

	the context of the Strategy and also identifies potential indicators that the proponent may use. Monitoring both of the SEA and the Strategy is the responsibility of the plan proponent and therefore a detailed plan, including baseline data for each indicator should be developed by the plan proponent.
Whilst the SEA Audit Team agrees that in terms of implementation, a Cost Benefit Analysis is required, it is also important to emphasise that this needs to be accompanied by a site selection exercise subject to an EIA (as opposed to an SEA) for the specific projects and to possibly evaluate the need for this to be accompanied by a socio-economic impact analysis.	Agreed.
The SEA Audit Team would also like to enquire whether the monitoring portion could incorporate a comprehensive monitoring plan in line with Schedule I part (i) of the SEA Regulations.	Refer to Chapter 9.
The Environmental Report should determine whether there are any risks of transboundary effects or not.	Potential significant transboundary effects have been considered in the context of the Proximity Principle.
Chapter 7 could be beefed up to reflect the provisions of Schedule 1 point (h).	Please refer to summary at end of chapter.
Whilst it is understood that the site selection process will be determined through an EIA, can the SEA look at the regional application of the proposed alternatives? Are any alternative sites to those being proposed in the revised Strategy being considered? If so these should be considered in the Environmental Report.	SEA is not the appropriate tool to consider impacts at specific sites or to compare potential environmental impacts between sites.
It is suggested that the Environmental Report provides a preliminary strategic assessment of the proposed sites in terms of their suitability to host the proposed infrastructure and to assess their contribution towards sustainable development principles.  In the light of MEPA's comments that the impact assessment conclusions are based on 'insufficient' clarity which should be highlighted in appropriate detail, the SEA Audit Team feels that Chapter 8 and Table 8.2 need to provide the necessary justifications and amplification that outline the reasons for	This SEA assesses the potential environmental impacts that the Solid Waste Management Strategy for the Maltese Islands could have at a strategic level. Consideration of environmental constraints at specific sites is appropriate at a lower level in the planning hierarchy.  The Strategy has been developed at a strategic level and therefore impact assessment will reflect this strategic level. The same level of detail of impact assessment at project level cannot be expected at SEA level. The entire Environmental Report highlights and explains difficulties

<p>any level of impact.</p>	<p>associated with the assessment of the Strategy. These difficulties are largely related to a number of uncertainties attached to proposals in the Strategy, either because they are of a strategic nature and therefore a more detailed level of assessment can only be carried out lower down in the plan /project hierarchy, or because the Strategy provides insufficient detail. As a result, the assessment cannot go into a more detailed assessment of impacts with any certainty. The Environmental Report has been prepared in accordance with best practice, highlighting where uncertainties lie and why any conclusions are considered uncertain. It has also provided a number of recommendations designed to reduce uncertainty where possible at this level.</p>
<p>Due to issues related to human health and the environmental impacts that might result from the proposed infrastructure and siting, especially the thermal treatment of high calorific waste, the SEA Audit Team would like to have a specific section of the Environmental Report devoted to this assessment and directly related to the proposed infrastructure and siting.</p>	<p>This is not possible in the absence of the identification of specific sites and specific technological detail for proposed facilities. The SEA considers potential impacts on human health at a strategic level and identifies indicators that are measurable at this level.</p>

**RESPONSE TO MEPA TECHNICAL ANALYSIS  
PREPARED FOR SEA AUDIT TEAM**

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# **SEA QUALITY CONTROL CHECKLIST: ADI RESPONSE**

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## **INTRODUCTION**

1. With reference to MEPA's Technical Analysis on the Environmental Report for the SEA on the Solid Waste Management Strategy for the Maltese Islands: Consultation Document 2009 to the SEA Audit Team dated 30<sup>th</sup> July 2009, this covering note aims to respond to those aspects of the checklist that were identified as incomplete. The Consultants' response to the consultation comments should also clarify issues brought up in the Technical Analysis.

## **CONSIDERATION OF ALTERNATIVES**

2. As described in the Environmental Report, the SEA assesses potential impacts from all alternatives considered in the Waste Strategy. MEPA's Technical Analysis makes reference to assessing all potential alternatives e.g. gasification. The SEA can only assess alternatives presented and considered through the development of the Waste Strategy – it is beyond the scope of the SEA to consider all potential waste management techniques and technologies.
3. One main difference between the assessment of impacts (based on SEA objectives) between Option 2 and Option 3 is that Option 3 is in line with the Proximity Principle – that is what the SEA objective 'meets local needs locally' refers to.

## **DESCRIPTION OF THE ENVIRONMENT LIKELY TO BE AFFECTED BY THE PLAN**

4. MEPA's Technical Analysis identifies that the effect of the plan on human health has not been considered and yet identifies SEA objectives that relate to this aspect. It should be noted therefore, that the SEA does indeed consider the impact on human health and well being in considering negatives effects on local residents from waste management activities including effects from dust, noise, odour and traffic.
5. A number of data sources have been used to obtain baseline information, as identified in the Technical Analysis. These have all been quoted in the Environmental Report.

## **PREDICTION & EVALUATION OF LIKELY SIGNIFICANT EFFECTS**

6. As identified in MEPA's Technical Analysis the assessment does consider frequency / duration of impacts.

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7. As identified in the Technical Analysis, uncertainties relate mainly to site specific details and technologies and therefore further consideration of impacts to this degree must be considered at a lower level in the planning hierarchy. The SEA provides recommendations to help the Strategy reduce negative environmental impacts at the strategic level.

## **DESCRIPTION OF MITIGATION MEASURES**

8. Mitigation measures are described clearly in **Chapter 8** and linked to recommendations. As described in the Environmental Report, mitigation proposed relates mainly to enhancing positive environmental impacts that would thus result in positive residual environmental impacts.
9. **Chapter 9** describes potential mitigation, these are referred to as 'recommendations', and are summarised in **Table 9.1**. The aim of these recommendations is to reduce potential negative impacts and enhance positive ones.

## **NON TECHNICAL SUMMARY**

10. The Non Technical Summary has been updated to include more detail in accordance with MEPA's comments.

## **MONITORING**

11. **Chapter 10** describes that monitoring of potential impacts identified in **Table 8.2** should be carried out and therefore reasons for the identified aspects for monitoring have been provided.
12. The responsibilities for the implementation of the monitoring programme lie with the Strategy proponent.