



BirdLife Malta's comments on the EIA Terms of Reference for the PA04863/22

The proposed construction of a Material Recovery Facility (MRF) for the processing of grey bag and recovery of different streams of materials. The proposal includes ancillary office space, staff quarters and parking spaces

ECOHIVE Complex, Naxxar

17th March 2023

After analysing the relevant documents published online in relation to the mentioned development, BirdLife Malta would like to contribute to the consultation process with the following feedback. Whilst appreciating and agreeing with ERA's conclusions of the screening process, we would like to emphasise:

- It is important to conduct a thorough assessment of the agricultural land loss, yet not solely within the boundary of the site, but also due to potential impacts on agro-ecosystems in the 100m buffer zone (including but not limited to the excavation and construction phase).
- Although ERA included light pollution issues in the recommendations, it should be stressed further that the light pollution during **both** the construction and operation phases is to be assessed, particularly by evaluating the external lighting scheme. No additional light spill is acceptable on the coast and in the vicinity of Natura 2000 sites (MT0000007, MT0000008, MT0000105, MT0000112), given that the area of Maghtab is already heavily polluted by light, especially along Tul Il-Kosta.
- The development shall include the construction of a greywater storage reservoir which in turn may have impact on underlying soil and underground water in case of leakage. Potential environmental impacts should be assessed in this context, and with additional attention given to the impacts on the surrounding agricultural land and how these should be mitigated.
- Fire safety implemented on site should be given special focus and evaluation, especially in the context of an unfortunate example of the Sant' Antnin waste treatment plant in Marsascala some years ago. Fire safety at the newly proposed facility should be a priority also due to the nature of treated materials which products of burning can lead to serious contamination of the surrounding environment, including protected marine waters.
- We suggest that a traffic impact statement should also be a part of the EIA, given the strategic function of Tul Il-Kosta (coast road) and its traffic load, as well as the fact that the facility will mostly accommodate heavy vehicles.



- In terms of generated waste during the excavation (estimated 53,000m³ of material), the applicant is to make sure that most of excavated material is reused as much as possible.

- The operation of a shooting range a few metres away from the proposed should be considered adequately. There should be clarity whether the range shall remain functional or would need to be relocated, in which case the respective impacts of its relocation need also to be considered.