

## Long term Waste Management Plan (2021-2030) in the Maltese Islands

### *Friends of the Earth Malta and Moviment Graffiti Recommendations*

Friends of the Earth Malta and Moviment Graffiti have been issuing recommendations on the waste situation in Malta since 2001, alerting and calling out the government on an increasingly complicated situation. We have particularly been insisting on the importance of waste reduction as the first and foremost measure to manage Malta's waste. We therefore appreciate the effort of this new Waste Management Plan to put emphasis on reducing waste generation, as per EU Waste Hierarchy. We acknowledge that a number of proposed measures go in the right direction to improve Malta's Waste Management and make it more sustainable. However, certain points and measures in the document do make the focus of our attention.

First and foremost, general concerns stem from this Plan. Though it is ambitious in nature, our main concern is that this plan may not suffice. Indeed, as mentioned in the document, past plans have not managed to deliver their promises, and nothing guarantees that this one will. The recycling rate in 2018 was at 15% whereas the aim for 2035 is 55% (failing the 50% in 2020). The landfilling rate in 2018 was at 85% aiming for 10% in 2035. We recognize that this should be catered for by the European Union, which strives to enforce legislation in Member States. However, we believe that more detailed plans and obligations should be expressed and committed on a national level. We also wish to underline the emergency of the situation, specifically as Malta's per capita waste production is one of the highest in Europe. We acknowledge that change cannot be immediate. However, too many actions are planned in the medium to long term, whereas they should be made the absolute priority.

We are also worried that the plan focuses too much on individual action. Households in Malta do have a role to play in reducing waste generation. However, to build an equitable society we need to remember that these actors have an economically reduced leeway compared to bigger stakeholders. We also believe that measures need to be backed up with studies and adequate research which is currently lacking in the proposed plan. We will detail these concerns and others below.

We are asking the government to act on the points mentioned in this feedback and finally implement the recommendations by the EU.

### ***An urgent situation***

Even though waste prevention is presented as one of the priorities, the strategic objectives underlined by this document do not make it clear. This seems to show that the objectives of this plan are unclear. Furthermore, though this document shows a change in mindset, it still insists on "awareness-raising campaigns". To face the urgent nature of the waste situation in Malta, these campaigns clearly will not be enough. It is important to reflect on the costs/efficiency of past public

awareness-raising (such as “Don’t waste waste” or “Save our Blue” or “Sort it Out”) to see how efficient they have been and to go further. In addition to awareness-raising campaigns, regulations are required for mandatory measures for waste-reduction and recycling for commercial and industrial sectors. An awareness campaign should this time include details on composite materials, thin plastic films, pharmaceutical products, textiles, etc.

The focus of the first part of this document, as is shown in the title, seems to be “maximising the value from waste”. While we understand the economic realities behind waste management, we wish to stress that it is also important to remember the economical, social and human costs behind the destruction of nature through the production of waste and these alone should suffice to justify the change. This plan should be linked to other policies and plans such as tourism and development increase, amongst others.

While prevention of waste generation is the focus of an important point, some measures, like the paper-reduction through the unsolicited mail project, seem quite piddling. Even though we agree that every step helps, presenting such measures cannot be a way of taking the focus off more ambitious measures such as disposal fees for industries and high importation tax on secondary packaging.

We are also quite concerned that a number of measures suggested are conditional to more data, research and exploration, which seems to show a lack of preparation from governmental entities. That is the case for instance of measure WMRO\_CW1 “introduction of a service charge to implement the pay-as-you-throw concept” is still said to be under “exploration” phase. Furthermore, the conditioning of such measures on research and data gives way to a very uncertain future for such measures: how will the public know what happens, and how will the government be held accountable on such measures? This leads us to our next concern.

### ***Accountability of public authorities***

Apparently, 79% of measures from the previous plan were implemented (p18). Yet, several graphics presented in this new plan show a number of EU targets were not reached in Malta (eg. figure 6 page 32 on landfilling MSW, or figure 11 page 45 on overall recycling). This seems inconsistent, and shows that measures taken in the previous plan were not endeavoring enough. Therefore, we are a bit surprised that this plan doesn’t show expected effects of the new suggested measures. Indeed, these measures must be means to reach the proper targets, and their effects must be made public so that the right authorities and stakeholders can be accountable for them. In point of fact, “accountability” is mentioned as a key element of good governance (page 21). Even though mechanisms to ensure this is put in place by the EU, how does this government guarantee that future legislative and private operators be held accountable?

We stress the importance of breaking down the targets to local council region level and support local councils to help reach these targets with a realistic budget. Local councillors are given the opportunity to propose a plan for enforcement to help reach such targets.

There needs to be targets and accountabilities for recycling quotas to be in line with the European targets. The measure MC\_WMF3 (page 190) aims to “Set up a system for publicly discussing compliant and non compliant offenders”. To ensure proper enforcement and compliance of all actors (government and public

authorities included), we think that this measure could go even further. Indeed, a bi-annual review should be in place, where ERA would publish how every actor is doing their part through KPIs, and what will need to be done to improve these actions. ERA allegedly has access to several data reports, which are only available to the public upon request (page 198 to 201). These reports must be the object of analysis from ERA, who should therefore publish a document combining the relevant information to this plan to show to the public what is being done. Both these measures would make all actors accountable to the public, and therefore would ensure proper implementation of the measures. Maybe this can be done through the enlargement of the planned Waste Data Management System (WD\_6, p 204).

### ***More detailed and ambitious measures are necessary for Malta to reach its targets***

#### Measures to prevent waste generation and promote reuse

Under the economic incentives planned to prevent waste generation, one can read the MECP “shall explore fiscal initiatives to make repair and reuse activities more economically viable”. We feel that this is quite vague, and that it would need more of a commitment that such fiscal incentives will indeed be implemented. This is to encourage more selling, donating and repairing of old items.

Regarding the problem of waste from textile and clothing, we acknowledge that the scope of action is limited since it is not produced in Malta. Therefore, we welcome measure WP-EI2 (ie. Develop fiscal incentives to promote repair and reuse activities, page 92), and want to know if it could include the development of structures such as charity/second-hand shops to reuse clothing? - Any form of repair activity which aims to reduce waste creation should be exempt from VAT. This should include activities which are currently taxed at 5% such as minor repairing of: a) bicycles; (b) shoes and leather goods; (c) clothing and household linen (including mending and alteration).

The next educational campaign should also include the discouragement of fast fashion purchasing and organisational and encouragement for second-hand buying.

#### Food waste

Regarding food waste, there is no mention of a measure to limit such waste streams coming from restaurants, processing and manufacturing. Such measures should be put in place to make the management of such streams more holistic (not only focussing on retail shops and households). Furthermore, measure WP\_RD3 “develop a reporting methodology for monitoring food waste” (page 101) lacks an explanation on the result of such reporting: what actions might be put in place following the collection of such data? We propose a legislative change - for more detailed information please refer to the “Food Waste in the Maltese Retail Sector” report which was commissioned by Friends of the Earth Malta in 2020. <https://foemalta.org/foodwastereport>

Policies should be in place to ensure that hospitality and retail are not allowed to dispose of leftover food which is in good condition. It must be donated to food banks or charities. This is mentioned. It must be put in place and enforced.

Households and educational institutions should be educated and encouraged to compost food waste. Systems may be set up for communal composting stations. It can then be sold or used for landscaping in

the community. Composting bins in schools would take up this initiative of having more awareness raising on the issue.

In education and awareness raising, MECP presents the problem of coffee cups to illustrate that single-use plastics are sometimes not obvious. Therefore, we suggest going further than the Single Plastic Directive and banning such cups (or other items containing “invisible” single-use plastic). Malta can and must try to do more than simply implement EU legislation, hence taking the opportunity to become a pioneer in certain measures.

There is also no mention on the amount of reverse vending machines that are planned to be installed and if they will fall under the responsibility of the local council or region.

We believe that measures such as WP\_V3 “introduce a voluntary agreement to encourage commitments to reduce waste across various commercial sectors” (page 96) should be planned in the short term and not medium term. Indeed, since it does not require a change in legislation and is not extremely ambitious compared to the targets Malta has to reach, it should be put forth earlier.

Our concern is indeed that sometimes the timeline does not seem ambitious enough. Indeed, measures such as WP\_L9, mandating a minimum of 15% recycled material in buildings (page 95), is scheduled to be enforced as of 2027. That is too late.

Gleaning networks can be implemented as soon as possible as this is not a project that requires infrastructure.

### Waste collection

Regarding the conversion of at least 10% of electric vehicles in Malta’s collecting fleet, it is indicated that it may be worth considering converting the whole fleet to electric vehicles (rather than the required 10%). (page 135). When will such a decision be taken, and when will further details to back this decision be published?

Technology such as vehicle tracking is mentioned, justified by the idea of improved road safety. While we agree with this purpose, we wish to make sure that this tracking device will not be a means to monitor the behaviour and “efficiency” of people working on such vehicles, as they already work under very stressful conditions.

Regarding the waste bags, the plan mentions introducing prepaid bags with different rates for residual and organic bags. Would it be possible to have more details on this subject, such as the price of such bags? We also wish to stress that organic bags should be much less expensive than residual ones, as collecting organic waste should be encouraged.

Service standards for businesses should also be introduced: An obligation for all commercial businesses to subscribe to waste collection services, and to keep evidence for a fixed period of time (i.e. to keep collection contract, bills etc. going back up to four years ready for inspection); An obligation for commercial businesses producing in excess of 5kg of food waste per week to participate in and present food waste for separate collection.

## Infrastructure

Regarding the work done on waste management infrastructure, we wish to underline that should anything new be built (eg. Organic Processing Plant or relocation of Marsa Thermal Treatment facility) it should be built in such a way that would be efficient and respectful of the environment. Indeed, addressing the relocation of the Marsa Thermal Treatment facility is scheduled for the phase 2021-2023. Should this Plant be relocated, and should this lead to more building work, it is important that such work still strive to respect the regulation mandating a minimum of 15% recycled materials in buildings. Even though that regulation is planned for the long term, the government must not build such facilities before its implementation simply to avoid it. Furthermore, building more infrastructure can sometimes be necessary but must not be a pretence of action (eg. building a Waste to Energy Plant was in no way a “green” solution, and further infrastructure building must focus on reaching targets and protecting nature). Furthermore, we recommend that an efficient management of the plants is implemented before building new facilities.

## Commercial Waste

Explanations provided on the current waste policy (6.8.2, page 180) show that separation at source is not compulsory for commercial establishments. Why couldn't this be made mandatory as part of the new plan?

Furthermore, phase one of commercial waste measures (page 180) states that “measures enacted in the short term will aim to encourage a shift in practices [...]” and that they “will transition to a regulatory obligation thereafter”. Considering the emergency of the situation, why is this not made into an obligation immediately? This lack of urgency in measures regarding commercial waste is also visible in measures such as measure MC\_WMF1 (“setting up of economic incentives for operators based on the compliance performance”), which is scheduled for 2024-2027 (page 193). As it seems it could be a very efficient measure, it might be wise to schedule it for the first phase. Economic incentives in general seem to be postponed when really they would be the most urgent and efficient measures.

Prohibition of commercial businesses to use the free household collection system.

Waste disposal costs need to be increased to reflect the costs of operating facilities and to account for any non-monetary impacts (such as environmental and medical costs); introduction of a landfill tax at a later stage.

## Recycling

Even though we would like to see a shift to make recycling mandatory, we advise that a good transition would support households by education on correct recycling methods.

We appreciate the reduction of black bag collection to twice weekly but we suggest that this is eventually reduced to once a week. This should be coupled with specific collections for nappies and sanitary products.

A local market for recycled products should be created, and incentives provided to companies who choose to use recycled products/packaging. Local packaging producers need to be heavily discouraged

from producing non-recyclable packaging or that which is very difficult to recycle (e.g. expanded polystyrene, HIPS, films).

More awareness of waste separation and collection regulations is required among the public. There is an issue with 'trust' in the waste collection companies which needs to be addressed. Sometimes when it is raining heavily, a large number of garbage bags are carried away and not collected. This is a huge problem, in particular for non-biodegradable items. Suggestion to encourage waste disposal in communal skips / bring-in sites or to narrow the waste collection timeframe.

The private sector should be encouraged to invest in sorting and recycling facilities. Malta also needs access to sustainable markets for recyclable materials. It isn't clear what currently happens to recycled plastic from the EU and Malta.

Figures show wood is not being recycled. Why is this? Civic amenity sites receive lots of furniture items and should be well-suited to processing them. It must be ensured that the facilities are well-equipped.

### EEE and Batteries

Encourage repair centres and retailers to invest in precious metal extraction and the correct sorting of electronic waste. Malta is not restricted by the Waste Electrical and Electronic Equipment (WEEE) regulation directly, however limitations on WEEE should be directed towards retailers. The collection targets can be applied to them and they will become collection centres. Can also apply to battery collection. No systems are currently in place to discourage the public from disposing of EEE with usual household waste.

We believe that 2027 for a plan on battery recycling/collection is too far away. Such a plan means that we will not be reaching the EU's 2016 collection targets for at least 11 years. The document is not giving any more info on the plan, it just says that a study will be conducted. There are other points not mentioned, such as the current method of disposing (landfill and incineration are banned across the EU). Currently industrial and automotive batteries have no collection targets, since usually those who are discarding such batteries are professionals and will hand over the battery back to the producer. Is this really happening? Is there a database regarding this?

### Industrial Waste and Oil Waste

It is unsafe for industrial waste to be landfilled so this should be unacceptable. Industries must sort waste and if no system is currently in place to manage their hazardous waste, they should be constrained to manage or export the waste themselves.

In all cases where there might be alternative, less-harmful or less-wasteful materials for the industry to use, incentives should be provided for selecting these methods.

## Construction Waste

We are aware of the plan “Construction and Demolition Waste Strategy for Malta, 2020-2025”. However, this plan is too short when taking into consideration the increase in rate of the construction industry. Moreover, this plan does not seem to have started being implemented, despite that we are already in 2021. All PA applications (or those for medium - large developments) should present a study on the construction waste to be generated and a plan for its use/disposal. Those who do not adhere to the plan should be penalized. **Dumping construction waste at sea should not be allowed, under no circumstances.** With regards to construction waste, we propose:

1. More enforcement and heavier fines for illegal dumping of construction waste in valleys, garrigues, ect to protect biodiversity.
2. Separation of construction waste so as to recycle material from the building industry when possible, such as mixed mineral waste, iron, wood, glass, textiles, gypsum, ceramics and plastics.
3. Setting up of stone depots to recycle maltese limestone.
4. Government incentives to use recycled material in construction such as recycled concrete. Moreover, the government should use recycled materials in infrastructure projects, hence increasing demands for such materials.
5. When handling construction waste, risk assessments must be carried out to minimise particulate matter emissions.
6. Surveying more quarries for disposal of construction waste and ensuring proper dumping so as to avoid increasing the particulate matter emission in the surrounding areas.