

**Utilities Topic Paper  
Draft for Public Consultation  
Response to Comments  
June 2002**

## Comments received during the Malta Public Consultation Meeting on 20<sup>th</sup> August 2002

| Item Number | Summary of Comments  | Directorate's Response  | Amendment                       |
|-------------|--|---|---------------------------------|
| 1           | <p><b>Mr. Patrick Scerri, Delicata Winery</b> – He made the suggestion that a system be introduced where the energy in a particular area would be switched off when the workers were not at work.</p>  | <p>Noted</p>  |                                 |
| 2           | <p><b>Mr. Michael Cachia, Maltacom</b> - Still important for fixed lines to be used. Do not agree with 3G Mobile lack of infrastructure and Government plan for 2 fibre optic cables being planned. Maltacom has fibre optic links with major banks and one of the mobile phone operators.</p> | <p>This paper is considering the use of land, and is also tackling a wide angle of services in the islands.</p> <p>In Mtarfa one can find a typical example of the sharing of equipment and it is not in the remit of the paper to discuss problems.</p> <p>Miss Briguglio also noted that it was difficult to get comments from persons. The comments then arrive when the mistakes are noted.</p> | <p>Para. 6.1.18<br/>deleted</p> |

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| 3 | <p><b>Mr. Clement Azzopardi, Farmers Central Co-Op</b><br/> – Making further use of Wind Energy and Solar Energy in Malta was discussed and further suggestions for their use were made.</p> <p>Water – Lack of maintenance at Chadwick Lakes and Buskett that was a result of soil erosion.</p> <p>Sewage – All Industrial waste was going to the same outfall. The compost being produced at Sant Antnin did not have any certificate that guaranteed that it did not contain any heavy metals, etc.</p> | Impacts of renewable energy tackled in paper to explain the effects of these.   |  |
| 4 | <p><b>Mr. Patrick Camilleri, Department of Agriculture</b><br/> – In the future, the scenario is going to change, e.g. animal waste in sewerage needs to stop and a study is in progress that tackles this problem. Sludge is another problem that needs solving. We need to promote the use of Solar Energy. Energy production needs to be improved and the future scenario needs to be tackled.</p>  | The paper is tackling these problems and is suggesting that everybody joins together to solve the problems. More reservoirs regulations to hold water.  |  |
| 5 | <p><b>Mr. Patrick Scerri, Delicata Winery</b> – We need to provide more consumer protection. If the present sewerage treatment plant does not work properly and there is a probability that future ones will too, what is going to happen especially if MEPA suggests that all boreholes are closed? The quality of the recycled water produced at the</p>   | The quality of the compost needs to be improved and also the quality of water as a result of the waste treatment process. MEPA is giving a general picture of the situation and is not going to tackle points |  |

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|   | treatment plants also needs to be improved.   | outside of its competence.  |  |
| 6 | <p><b>Miss. Felice Farrugia, Malta Resources Authority</b> - The land on such an island is limited and thus the promotion of efficient use of the land is required. The Authority also stated that the Energy policy would soon be published. The idea of having an Industrial Estate producing it's own power was a good idea but needed to be further discussed. The Authority also noted that the study on the location of sites for renewable energy was scheduled to be published early next year. They also agreed that efficient use of energy was important.</p> <p>MEPA has an important role in the promotion of renewable energies in new industries, etc.</p> <p>Water is a major priority in Malta and Sewage Treatment Plants need to be better maintained. Regarding flood areas, better plans to collect water when possible needed to be discussed and implemented where possible.</p> | Government has plans to have bigger reservoirs and other plans to try and solve these problems. |  |

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| 7 | <p><b>Mr. Charles Bonnici, Public Health Department</b></p> <p>- Does the plan take into consideration any catchment areas to collect rainwater? How much is MEPA enforcing the law that each house must have its own well?</p> | <p>There must be conditions introduced in the permit that there must be a well. Roads Department have a strategic plan for Central Zone, to introduce corridors/canals to collect water and in some places also introduce / construct reservoirs.</p> <p>Enforcement is important to check where the law has not been applied regarding the wells.</p> |  |
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## Comments received during the Gozo Public Consultation Meeting on 20<sup>th</sup> August 2002

| Item Number | Summary of Comments   | Directorate's Response   | Amendment |
|-------------|---|--|-----------|
| 1           | <p><b>Mr. Giovanni Zammit, Wirt Ghawdex, Koperativa Gozitana</b> - What is the relationship between MEPA and providers? Is MEPA going to impose on the companies that own the services?</p> | <p>We have to plan together with providers to consolidate and integrate utilities provision from land use point of view to ensure efficient use of land.</p> <p>Rapidly expanding sectors such as telecom together with the current situation in the country, when many important decisions are about to be taken, the best way is to be flexible.</p> |           |
| 2           | <p><b>Mr. Victor Galea Pace, Member of Parliament</b> - It is important to have a sensitive approach to infrastructure provision in important areas.</p>                                    | <p>There is a detailed guidance, for sensitive areas e.g. Mdina. Ready ducting is required for some projects so all necessary infrastructure may be laid later as needed with minimum impacts.</p> <p>MEPA does not have the full leverage to ensure</p>   |           |

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|   |   | implementation of Structure Plan. Its success depends on cooperation among various agencies. There is often a conflict of perceived responsibilities by different agencies involved. |  |
| 3 | <p><b>Mr. Giovanni Zammit, Wirt Ghawdex, Kooperativa Gozitana</b> - Will MEPA impose on new roads on constructions to have services provided underground.</p>   | <p>Presently new constructions are being approved with access to underground ducting for future use.</p> <p>MEPA needs to enforce further on conditions in present SP.</p>           |  |
| 4 | <p><b>Mr. Victor Galea Pace, Member of Parliament</b> - Why is consultation mainly done with constitutional bodies? It should be the public that have to be consulted.</p> <p>There is nothing wrong with development but it has to be appropriate and sustainable.</p> | <p>We have done PAS, Local Councils, Media and other initiatives to address the public, but it is not always easy to convey specific strategic concepts to the general public.</p>   |  |

## Comments received in Writing as Public Consultation Exercise

| Item Number | Summary of Comments  | Directorate's Response | Amendment   |
|-------------|--|------------------------|---|
| 1           | <p><b>“People of Malta” (September 2002) –</b></p> <p>All the comments made in document stem from a health concern.</p> <p>Calls for an information booklet from MCA or a form of awareness to inform people about potential risks.</p> <p>The description found on site notices “Telecommunications Antenna” is misleading as it is many times mistook for a satellite antenna.</p> <p>Recommended that all mobile phone companies should agree to be jointly liable for any damages resulting from the antennae emissions.</p> | Noted                  | <p>Talks with MCA to work together to tackle matters of common interest have already started.</p> <p>Suggestion made to competent authority to change the description found on site notices from “Telecommunications Antenna” to “Mobile Telephony Microwave Antenna”</p> |
| 2           | <p><b>The Malta Communications Authority (September 2002) –</b></p>  | Noted                  | <p>Para 6.1.18 removed.</p>   |

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|  | <p>Too much emphasis on mobile telephony.</p> <p>A third mobile licence can only be granted after 2004. If it is determined that such licence will be issued the third operator would be expected to start operations in 2005 (para. 6.1.13).</p> <p>As part of the National Development Plan the basis of the Single Programming Document for 2004 – 2006 includes a project that involves the upgrading of 'last mile' telecommunications connections.</p> <p>International conductivity liberalisation would bring about at least another international link.</p> <p>MCA suggest the removal of Para 6.1.18.</p> <p>Health concerns are being addressed by MCA. The Authority is currently carrying out EMF audits to monitor the emissions from mobile base stations. Results so far have shown that readings obtained are very much below stipulated thresholds relating to recommendations for public exposure levels.</p> <p>Liberalisation of the postal sector could lead to new entrants in the market. The latter will be fully</p> |  | <p>Some minor additions and amendments were carried out in text to address inaccuracies that might have misled the reader.</p> |
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|   | liberalised by 2009.   |        |  |
| 3 | <p><b>Maltacom plc. (September 2002) –</b></p> <p>Pointed out that a lot of emphasis is put on mobile phones.</p> <p>Wider pavements or the availability of small open spaces are needed for the installation of more infrastructure. Otherwise internal installed equipment could be housed in the space of an average size garage so that copper distance to the customer remains below a specified length.</p> <p>Correction of Para 6.1.2 – Microwave link has been, in fact, upgraded.</p> <p>A third mobile phone operator would be expected to start operations in 2005 (para. 6.1.13).</p> <p>Maltacom do not agree with Para 6.1.18 and suggest its deletion.</p> | Noted. | <p>Where applicable text has been amended.</p> <p>Para 6.1.18 removed.</p>             |
| 4 | <p><b>Mobisle Communications Ltd. (September 2002) –</b></p> <p>Comment of the terminology of some aspects contained in the Topic Paper such as the usage of</p>   | Noted. | <p>Parts where the text refers to the Stewart Report have been revised and through</p> |

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|   | <p>the word “masts” vs. the word “base stations”.</p> <p>Highlight the problems that exist with site sharing as they claim competition is exercising exclusivity rights that preclude other operators from using the same sites.</p> <p>Suggest the correction of Para 6.1.20, vis a vis residential areas.</p> <p>MEPA should be aware that the local planning framework is more rigid than that in the UK, hence some of the concerns shown in the Stewart Report do not necessary apply locally.</p> <p>Suggest the addition in the Topic Paper of base station auditing.</p> <p>Mobisle Communications Ltd feel there are inconsistencies in approving equipment on properties that have illegalities.</p> |       | <p>through consultation with MCA some aspects clarified.</p> <p>The impacts of exclusive rights have been discussed with MCA and a way forward will be sought.</p> |
| 5 | <p><b>Malta Resources Authority (December 2002) –</b></p> <p>The Authority pointed out some misprints that could mislead the reader and suggested additions to the text (particularly in the Executive Summary</p>   | Noted | Additions to text where carried out as suggested.  |

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|  | <p>para. 5.2).</p> <p>Highlighted the fact that more consideration should be given to bunkering activities.</p> <p>Clarification made on para. 5.2.22 regarding the liberalisation of the fuel market in relation to the storage capacity and the availability of land.</p> |  |  |
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