Country profile

Early warning assessment related to the 2025 targets for municipal waste and packaging waste

Malta

June 2022

European Environment Agency

Contents

Acknowledgements

This draft assessment was prepared by the ETC/WMGE and the successive ETC/CE under guidance of the European Environment Agency and with inputs from a consortium led by Rambøll Group under contract with the European Commission. It builds to a large extent on the answers provided by the Ministry for the Environment, Energy and Enterprises in May 2021 to a questionnaire developed by the EEA and ETC/WMGE. The EEA and ETC/CE would like to thank the Maltese authorities for the information provided and for the kind review of drafts of this assessment in 2021 and April 2022.

1 Introduction

1.1 Background and purpose

The Waste Framework Directive 2008/98/EC (as amended by Directive (EU) 2018/851) includes a target to recycle and prepare for reuse, by 2025, 55 % of municipal waste generated. The Packaging and Packaging Waste Directive (94/62/EC as amended by Directive (EU) 2018/852) includes targets for the recycling of packaging waste, both in total and by material, to be achieved by 2025. The Landfill Directive (1999/31/EC as amended by Directive (EU) 2018/850) requires to limit the landfilling of municipal waste to 10 % of the generated municipal waste by 2035. The Directives also foresee that the European Commission, in cooperation with the European Environment Agency, publishes early warning reports on the Member States' progress towards the attainment of the targets, including a list of Member States at risk of not attaining the targets within the respective deadlines, three years ahead of the target dates. This assessment is a contribution from the EEA to the early warning reports according to Article 11b Waste Framework Directive and Art. 6b Packaging and Packaging Waste directive.

This document is an early warning assessment for Malta. The document is based on the analysis of a number of factors affecting recycling performance (success and risk factors). The assessment aims at concluding whether Malta is at risk of missing the targets for municipal waste and packaging waste set in EU legislation for 2025. In addition, it provides a preliminary assessment of the prospects for meeting the 2035 target for landfilling of municipal waste.

The assessment takes into account information that was available before 10 May 2022.

1.2 Approach

The assessment follows a methodology developed by the EEA and ETC/WMGE and consulted with the Eionet in 2020 (ETC/WMGE, 2021), which was adjusted in 2021 taking into account experiences with applying the methodology in 2021 (ETC/CE & ETC/WMGE, 2022). This methodology uses a set of quantitative and qualitative success and risk factors that have been identified to affect the recycling performance. The assessment is to a large extent based on the information provided by the Member State in the reply to an EEA-ETC/WMGE questionnaire as well as on available data and information from Eurostat and other relevant sources. In addition, a consortium under contract with the European Commission (led by Rambøll Group) has conducted a critical review of the draft assessment in Q4/2021 and provided further information.

More specifically, chapter 2.1 assesses the likelihood for Malta to achieve the target to prepare for reuse and recycle at least 55 % of municipal solid waste (MSW) for 2025. Chapter 2.2 assesses the likelihood for Malta to achieve the overall packaging waste and specific packaging materials' recycling targets for 2025. Chapter 2.3 examines the prospects for Malta to landfill less than 10 % of the generated municipal solid waste by 2035. The official early warning assessment for the landfilling target is only due in 2032 and accordingly, the assessment contained in Chapter 2.3 is only preliminary.

1.3 Member State profile – context parameters

Municipal waste generation and treatment

The annual municipal waste generation in Malta shows an increasing trend for total MSW generation during the period 2016-2019. In 2020 the data shows a decrease, resulting in an amount similar to 2018 (Figure 1.1). A similar evolution is seen in the per capita waste generation. Also, here the amount has increased from 642 kg/person in 2016, to 697 kg/person in 2019. In 2020 this amount dropped to 643 kg/cap, but this is still significantly higher than the (estimated) EU average of 505 kg/person in 2020 (Eurostat, 2022a). The extensive tourism industry in Malta has a considerable impact on municipal waste generation, as well as the fact that all packaging waste (including from industry sources, excluding wooden packaging and packaging containing hazardous substances) is included in municipal waste statistics (EEA, 2016; National Statistics Office - Malta, 2020).

The major factor contributing to the difference between waste generation and treatment volumes in Malta is explained by temporary storage of municipal waste. Other factors include moisture gains and losses in organic waste and waste that is exported for treatment under pre-treatment codes (D8, D9, D11, D13-15, R12, R13) and for which there is no information about the final treatment (National Statistics Office - Malta, 2020).

In Malta, mechanical sorting plants are in operation. The outputs of the sorting plants are refuse-derived fuel (RDF); sorted recyclables which are exported for final treatment; and rejected materials which are landfilled. In addition, Malta has two mechanical biological treatment (MBT) plants in operation. Outputs from the MBT plants are landfilled, with recyclables sent to sorting plants for further processing (National Statistics Office - Malta, 2020).

Landfilling is the dominant treatment method for MSW, with 82.5 % of the waste being landfilled in 2020. The recycling rate is low and quite stable, with a share of 10.5 % in 2020. This recycling rate is entirely driven by material recycling as digestate of organic material is landfilled while the biogas produced is used to generate heat and electricity.

The small waste generation volumes in Malta create an obstacle to achieving economies of scale in recovery and recycling of waste (EEA, 2016). All waste allocated to recycling is being exported (Eurostat, 2017).

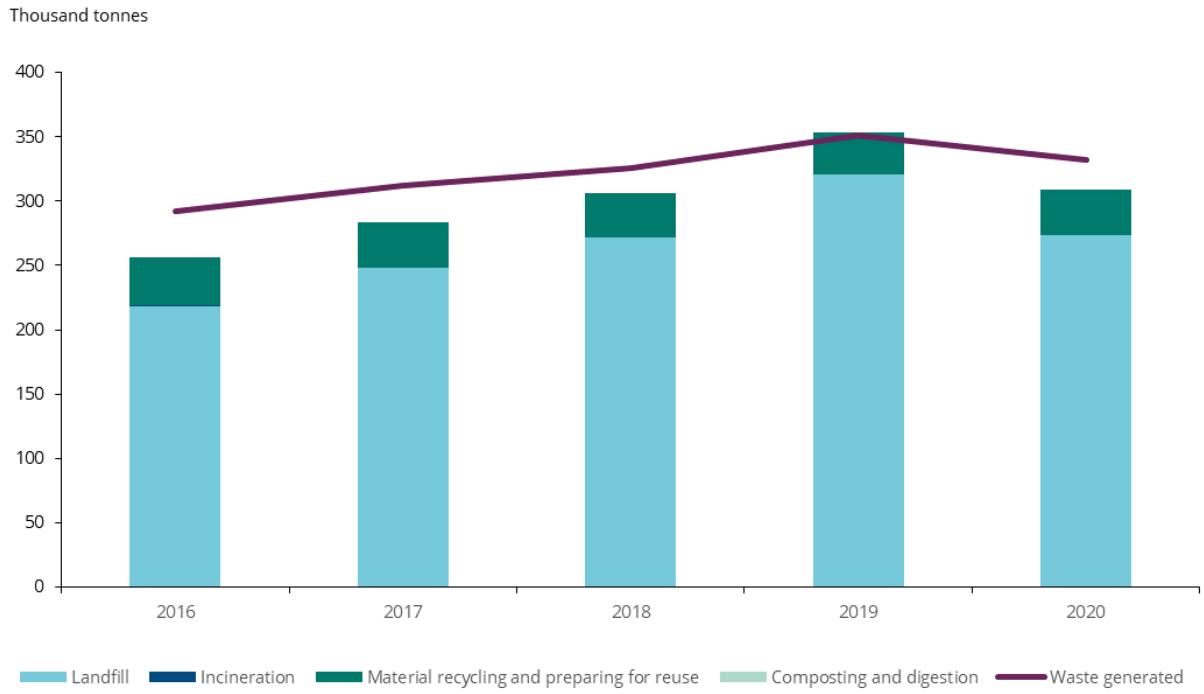
Following a fire incident at the national sorting facility in late 2017, the volumes and quality of sorted recyclable waste decreased significantly. As a consequence of this and of increasing restrictions on the exporting recyclable waste, a good share of recyclable waste was exported as RDF. As a small island state, Malta is heavily dependent on exports for environmentally sound waste management. However, the national waste treatment infrastructure has been undergoing considerable improvement and a new rudimentary line for recycling was set up in 2020, with metal and ferrous recycling. A glass recycling line was also set up in 2021. Plans for the commissioning of a new Material Recovery Facility (MRF) are well underway. Measures to reduce the contamination rate in the separate collection of recyclables are also being put in place. (Ministry for the Environment, Energy and Enterprises, 2022)

To build the necessary waste management facilities to treat recyclable, organic and residual waste to achieve Malta's targets, the ECOHIVE Project includes the construction of:

- an organic processing plant which will turn organic waste material into high quality compost for agricultural use and will also generate gas;
- a waste-to-energy plant which will turn waste which would have otherwise gone to landfill into energy;

- a thermal treatment facility which will replace the already existing plant which has reached its life cycle expectancy;
- a skip management facility which will segregate 47 000 tonnes of bulky waste per year (which would otherwise have gone to landfill) and processed for recycling, to be inaugurated in 2022;
- a material recovery facility is also being constructed to enhance the recycling processes of material, to be inaugurated in 2022;
- a multi-material recovery facility accommodating the commercial sector will also be opened in Hal Far and will take materials such as mattresses, wood, gypsum and so on, to be inaugurated in 2022. These waste streams will also be processed and prepared for export within the same facility for recycling.

Figure 1.1 Municipal waste generation and treatment in Malta between 2016 and 2020, in thousand tonnes



Note: Provisional data for 2020.
Source: Eurostat (2022a)

Legal Framework

The Environment Protection Act is the main legislation to make provisions for the protection of the environment. The Act designates the Environment and Resources Authority (ERA) as the competent authority for waste management. One of the functions of the competent authority is to regulate and set measures to protect the environment and promote efficient use of natural resources in and through the practices, operations, activities and functions regulated by the Environment Protection Act (Government of Malta, 2020a; Ministry for the Environment, Energy and Enterprises, 2022).

The Waste Management Plan for Malta 2021-2030 is the key planning instrument for waste management in Malta (Maltese Ministry for the Environment, Energy and Enterprises, 2021). The plan, as mandated under the EU Waste Framework Directive and related national legislation, sets out a number of key priority areas that are aligned with strategic objectives in order to ensure a robust and

effective waste governance framework (Maltese Ministry for the Environment, Energy and Enterprises, 2021; Ministry for the Environment, Energy and Enterprises, 2022).

The Waste Regulations (Government of Malta, 2011) as amended in 2021 (Minister for the Environment, Energy and Enterprises, 2021), are the key legislative instrument in Malta with respect to waste. Inter alia, they state that the local councils are responsible for setting up separate collection of recyclables and bio-waste, whilst Regional Councils are responsible to ensure that such systems are in place. The aforementioned Regulations also stipulate that there shall be systems for the separate collection of hazardous household waste and textiles by 1 January 2025. The Waste Regulations mandate that waste management in Malta is based on the waste hierarchy and, to this end, they provide for the use of economic instruments and other measures to provide incentives for the application of the waste hierarchy. The Waste Regulations also establish new targets for re-use and recycling of municipal waste in line with the Waste Framework Directive as amended by Directive (EU) 2018/851. The new rules for the calculation of the attainment of the targets emanating from the amended Waste Framework Directive are included in the national Waste Regulations. In line with the aforementioned Regulations, the Minister responsible for the environment may decide to place the responsibility to attain such targets on the Local Councils and/or Regional Councils, or on both (Government of Malta, 2011; Ministry for the Environment, Energy and Enterprises, 2022).

The Extended Producer Responsibility Framework Regulations, adopted in 2021 under the Environment Protection Act to transpose articles 8 and 8A of the amended Waste Framework Directive, regulate producer responsibility, including for packaging, WEEE, batteries and accumulators and end-of-life vehicles, by means of *inter alia* establishing new general minimum requirements on EPR. Owing to the horizontal and multidisciplinary nature of EPR, the EPR Framework Regulations also mandate the establishment of the EPR Consultative Committee to assist the Environment and Resources Authority in fulfilling its duties vis-à-vis the implementation of the EPR principle in Malta (Minister for the Environment, Climate Change and Planning, 2021; Ministry for the Environment, Energy and Enterprises, 2022).

The Waste Management (Packaging and Packaging Waste) Regulations (S.L. 549.43 as amended in 2021) to transpose the amended Packaging and Packaging Waste Directive (EU) 2018/852 into the national legal framework by implementing the EPR principle. Pursuant to these Regulations, the authorised Producer Responsibility Organisations are obliged to finance any system for the collection, treatment, recovery and environmentally sound disposal of all municipal packaging waste. To this end, they shall make arrangements with the Local Councils for the door-to-door collection of municipal packaging waste and the provision of recycling points for the separate collection of such waste. The Packaging and Packaging Waste Regulations place the obligation to attain the new recycling targets on producers or the authorised Producer Responsibility Organisations. The new rules for the calculation of the attainment of the targets emanating from the Packaging Directive are reflected in the national Packaging Regulations (Government of Malta, forthcoming; Ministry for the Environment, Energy and Enterprises, 2022).

The Restrictions on Placing on the Market of Lightweight Plastic Carrier Bags Regulations (S.L. 549.139) bring into effect Directive (EU) 2015/720 amending Directive 94/62/EC as regards reducing the consumption of lightweight plastic carrier bags, by means of prohibiting the placing on the national market of lightweight plastic carrier bags as from 1 January 2021 and any further distribution as from 1 January 2022. Very lightweight plastic carrier bags, reusable carrier bags and biodegradable and compostable lightweight plastic carrier bags are exempt from the aforementioned prohibitions (Government of Malta, forthcoming; Ministry for the Environment, Energy and Enterprises, 2022).

The Waste Management (Electrical and Electronic Equipment) Regulations, (S.L. 549.89 as amended in 2021) to transpose Directive (EU) 2018/849. Through these Regulations, which are based on the EPR principle, requires producers of EEE and authorised Producer Responsibility Organisations to finance the cost for the collection, treatment, recovery and environmentally sound disposal of WEEE. In addition, any WEEE collected through systems funded through Local Councils are deposited at designated facilities operated by the local agency, are to be handed over to the authorised Producer Responsibility Organisations at a price that reflects the total cost recovery of collection and storage up to the point of take-over by the respective Producer Responsibility Organization (Ministry for the Environment, Energy and Enterprises, 2022).

The Waste Management (Waste Batteries and Accumulators) Regulations, (S.L. 549.54 as amended in 2021) to transpose Directive (EU) 2018/849. Pursuant to these Regulations, the authorised Producer Responsibility Organisations are obliged to finance the cost of collection, treatment and recycling of all waste batteries. In view of this, any waste batteries and accumulators collected through systems funded by Local Councils are deposited at designated facilities operated by the local agency, are to be handed over to the authorised Producer Responsibility Organization at a price that reflects the total cost recovery of collection and storage up to the point of take-over by the respective Producer Responsibility Organisation (Ministry for the Environment, Energy and Enterprises, 2022).

Local Government Act (Government of Malta, 2020b) states that each Local Council is responsible for the arrangement of waste management, , whilst the Regional Councils are responsible for the issuance of a call for tenders for the provision of the waste management service to the local councils within their territories as from 2022 (Ministry for the Environment, Energy and Enterprises, 2022).

The Beverage Containers Recycling Scheme, regulated by S.L 549.134 through Circular Economy Malta, aims to enhance the collection and recycling of beverage containers, thereby reducing litter and, particularly, marine litter which is regretfully characterized by a high percentage of land-based plastics (Ministry for the Environment, Energy and Enterprises, 2022).

Waste management plan(s)

The National Waste Management Plan (NWMP) of Malta, *Long term Waste Management Plan 2021-2030* was published in September 2021 by the Ministry for the Environment, Energy and Enterprise (MEEE). The overall aim of the plan is to better comply with the requirements laid down in the European Waste Framework Directive and the Packaging and Packaging Waste Directive. By means of the NWMP, the Maltese Islands mainly aim at a (i) mitigation of waste generation, (ii) an improvement of waste management, logistics and infrastructures and (iii) a reduction in the dependence of both waste exports and landfilling. According to the WMP the Ministry's objectives are:

- Maximize the resource value in waste through different management options;
- Innovate by designing waste prevention initiatives to lower Malta's per capita generation rate;
- Reform the collection system to increase economies of scale, harmonize collection practices and modernize the collection fleet;
- Build the necessary waste management facilities to treat recyclable, organic and residual waste to achieve Malta's targets;
- Study the feasibility of an enhanced producer responsibility framework to complement Malta's transition to a circular economy and reflect further on the true cost of waste management;
- Promote further the involvement of the private sector in waste management.

To reach these objectives, a promotion of resource efficiency and incentives to reduce waste generation is introduced. Additionally, a waste collection reform is proposed to (i) increase source

segregation of waste streams and the minimization of residual waste and (ii) to foster regional involvement by a modern vehicle fleet for waste collection. Finally, the waste management and handling of resources shall be enhanced by (i) improving existing EPR schemes and potentially extending EPR obligations, (ii) incentivising waste prevention and (iii) investing in new and existing waste management plants.

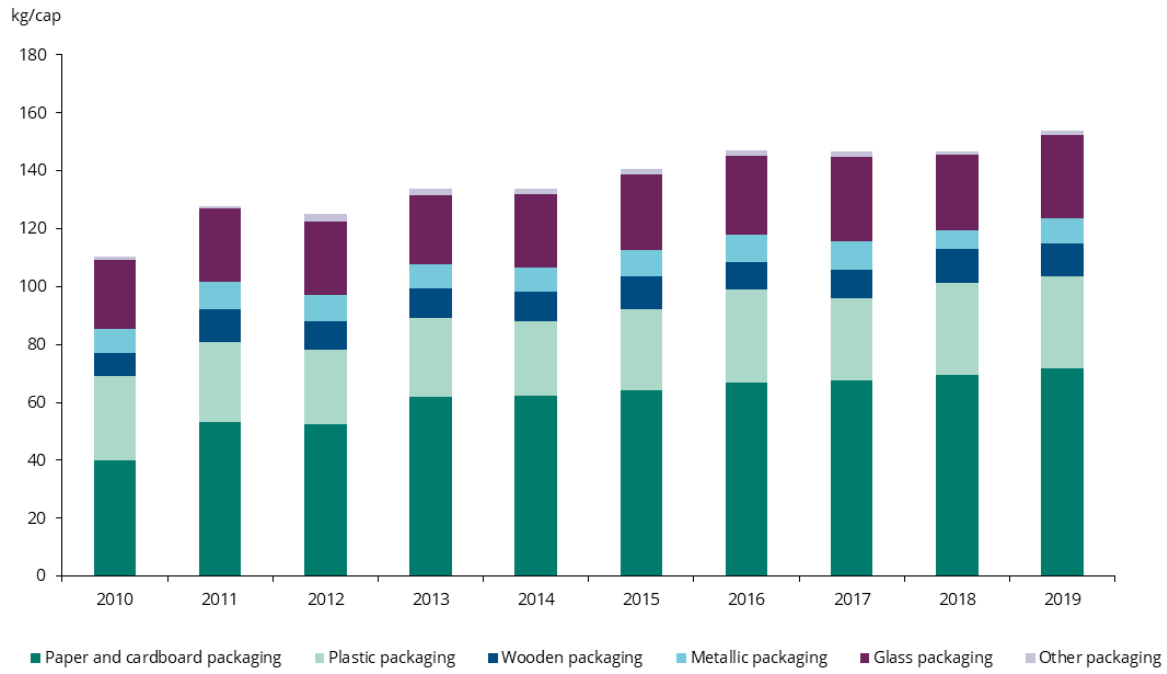
Implementation of previous early warning recommendations

Malta had been considered of being at risk of missing the 2020 target of 50 % preparation for re-use / recycling for municipal waste by the European Commission (EC, 2018b), and it received a set of policy recommendations (EC, 2018a). Annex 1 lists the recommendations and a self-assessment of the Ministry for the Environment, Energy and Enterprises of Malta on the status of taking them into account.

Packaging waste generation and treatment

In Malta, 77 477 tonnes (153.7 kg/cap) of packaging waste were generated in 2019, which is below the estimated EU average of 177 kg/cap. Figure 1.2 shows that packaging waste generation has been increasing during the past 10 years.

Figure 1.2 Packaging waste generation in Malta between 2010 and 2019, in kg per capita



Source: Eurostat (2022b)

Capture rates for recyclables

The capture rate is a good performance indicator of the effectiveness of the separate collection system. The capture rate is calculated by dividing the separately collected weight of a certain material for recycling by the weight of the material in total municipal waste. For Malta, Table 1.1 shows the calculated capture rates for different waste fractions.

Table 1.1 Capture rates for different waste fractions in Malta

	Residual waste composition (%)([b])	Residual waste composition (tonnes)([a])	Separately collected amounts (tonnes)([b])	Materials in total MSW (tonnes)	Capture rates (%)
Reference year	2018	2019	2019		
Mixed municipal waste, total		158 475			
Paper and cardboard	10 %	16 212	20 919	37 131	56 %
Metals	3 %	4 358	1 493	5 851	26 %
Glass	4 %	5 784	8 708	14 492	60 %
Plastic	19 %	29 904	3 736	33 640	11 %
Bio-waste	41 %	65 054	32 850	97 904	34 %
Textiles	7 %	10 428	1 813	12 241	15 %
Wood	1 %	1 521	8 631	10 152	85 %

([a]) Note: Share of material in residual waste (household waste only) in 2018 multiplied with the amount of residual waste in 2019 as reported in the questionnaire by the Ministry for the Environment, Energy and Enterprises (2021).

([b]) Source: As reported in the EEA-ETC/WMGE questionnaire by the Ministry for the Environment, Energy and Enterprises (2021).

This indicates that that there is room for improvement to capture higher amounts of the generated plastics, textiles, metals and bio-waste, and to some extent also of paper and cardboard, glass and wood. It can be expected that the share of bio-waste will decrease, as nation-wide separate collection of bio-waste was introduced in 2019.

2 Success and risk factors likely to influence future performance

2.1 Target for preparing for reuse and recycling of municipal waste

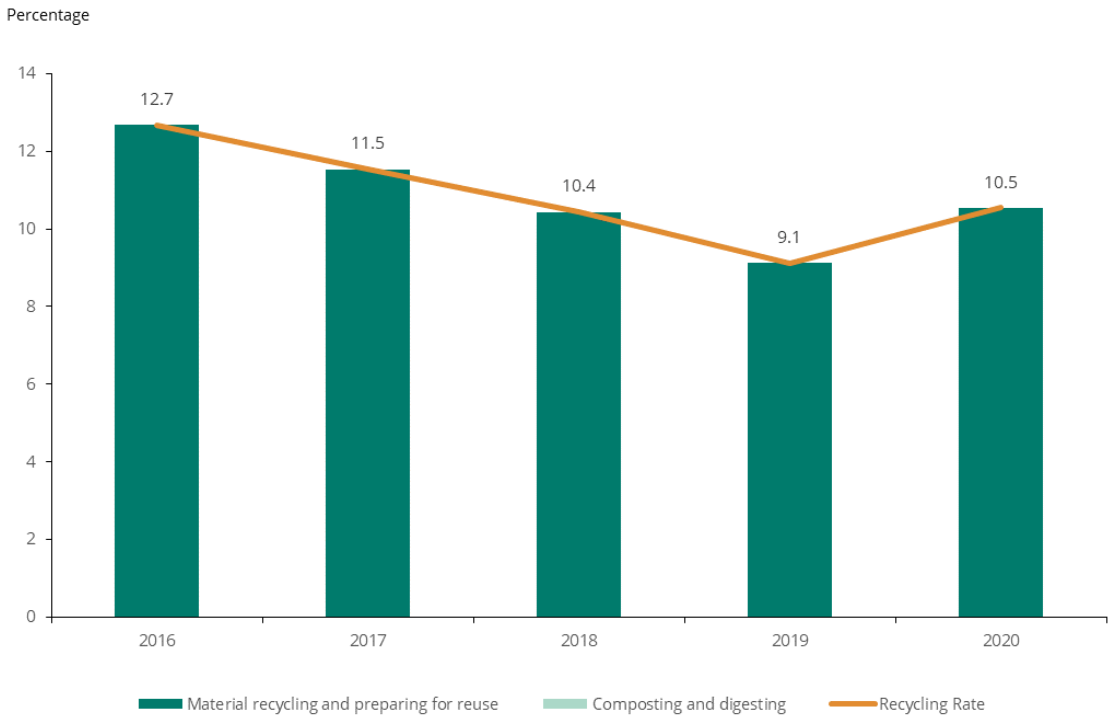
This chapter aims at assessing the prospects of Malta to achieve the **55 % preparing for reuse and recycling target** for municipal waste in 2025. For a detailed description of the methodology followed, the development of success/risk factors and their impact on recycling, please consult the methodology report (ETC/CE & ETC/WMGE, 2022).

2.1.1 Current situation and past trends

SRF MSWR-1.1: Distance to target

The overall recycling rate of Malta shows a decrease for the period 2016-2019. In 2020 there was an increase by 1.4 percentage point, bringing the recycling rate back to the same level as 2018 (Figure 2.1). In this analysis the recycling rate is calculated by dividing the summed amounts of recycling of materials and of composting and digestion by the total generated amounts. The data source used is the Eurostat data set *Municipal waste by waste management operations [env_wasmun]* (following the OECD/Eurostat Joint Questionnaire); Data reported by Member States according to Article 10.2(a) of the Waste Framework Directive are not used for this assessment as the reporting methods differ by Member State, resulting in a lack of comparability between Member States. The data source used here is assumed to be the best available proxy, given that data in accordance with the rules on the calculation of the attainment of the targets as defined in Article 11a are not yet available.

Figure 2.1 Recycling rate in Malta between 2016 and 2020, in percentage



Note: Provisional data for 2020.

Source: Eurostat (2022a)

The actual distance to the target for the most recent data point is a key factor determining the likelihood of meeting/not meeting the target. The closer the Member State is to the target already, the more likely that the target will be met. For Malta, the recycling rate is 10.5 % in 2020, which is far from the 55 % target for 2025 (Eurostat, 2022a). These numbers suggest that while the capture rates for different waste fractions demonstrate separate collection activities are active in Malta, the materials seem not to be recycled.

However, the data used for this analysis are based on a different methodology than the calculation rules for the target. The actual impact of the application of the new calculation rules to the recycling rate has not been quantified yet in Malta. Until now, the calculation method 1[1] has been used by Maltese authorities, and they expect that reported recycling rates may decrease with the application of the new calculation rules (Ministry for the Environment, Energy and Enterprises, 2021). A few Member States have provided quantified estimates indicating how the application of the new reporting rules would influence the recycling rate (compared to the data reported to Eurostat under the Joint Eurostat/OECD questionnaire), resulting in reductions between 3.8 and 13 percentage points, and on average 5.5-6.7 percentage points. While the effect depends on how Malta currently reports the data, an effect of a reduction with 5 percentage points is therefore assumed for this assessment, bringing the recycling rate down to 5.5 %. This assumption does not result in a change of the assessment for this SRF.

Although Malta reports separate collection and treatment of bio-waste (see Sections 1.3 on capture rates and 2.1.7 on bio-waste treatment), Malta reported no composting and digestion as final treatment of MSW to Eurostat so far (Eurostat, 2021b). This is due to the final use of the generated compost for landscaping and landfill remediation (Wasteserv, 2022) which is not reported as recycled, but as landfilled. The Maltese authorities expect to move closer to the target with the setting up of new waste treatment facilities within the ECOHIVE complex (see Section 1.3).

[1] Member States were allowed to choose one out of the four following calculation methods to show compliance with the 2020 target (European Union, 2011):

- Method 1: Recycling rate of paper, metal, plastic and glass household waste, in %=Recycled amount of paper, metal, plastic and glass household waste/Total generated amount of paper, metal, plastic and glass household waste
- Method 2: Recycling rate of household and similar waste, in %=Recycled amount of paper, metal, plastic and glass waste and other single waste streams from households or similar waste stream/Total generated amount of paper, metal, plastic and glass waste and other single waste streams from households or similar waste
- Method 3: Recycling rate of household waste in %=Recycled amount of household waste/Total household waste amounts excluding certain waste categories
- Method 4: Recycling rate of municipal waste, in %=Municipal waste recycled/Municipal waste generated

Summary result

Distance to target > 15 percentage points	Based on currently available data Malta's recycling rate was 10.5 %, 44.5 percentage points below the 2025 target. Considering however the impact of the new calculation rules, we assume a reduction with 5 percentage points for this assessment, resulting in an estimated recycling rate of 5.5 %, 49.5 percentage points below the target.
Robustness of the underlying information	The currently available data does not yet reflect the calculation rules applicable to the 2025 target. Malta has not yet quantified the influence of the new calculation rules on the recycling rate (at the time of writing this assessment). However, also a recycling rate which would be 5 percentage points below the currently reported one, would not change the assessment for this SRF.

SRF MSWR-1.2: Past trend in municipal solid waste recycling rate

The recycling rate over the last four years shows a steady decrease during the period 2016-2019. In 2020 the recycling rate went back up to the level of 2018 (Figure 2.1). There is a difference between generation and treatment volumes that is explained by temporary storage of municipal waste (National Statistics Office - Malta, 2020).

The Waste Management Plan 2021-2030 of Malta describes plans to reform the waste collection system to better support separate collection and subsequent improvement in recycling rates. (Maltese Ministry for the Environment, Energy and Enterprises, 2021).

Summary result

RR < 45% and increase in last 5 years < 10 percentage points	The recycling rate has decreased with 2.1 percentage points over the past five years. For Malta, the application of the new calculation rules would result in an estimated recycling rate of 5.5%.
Robustness of the underlying information	The data for 2020 are provisional. The currently available data does not yet reflect the calculation rules applicable to the target.

2.1.2 Legal instruments

SRF MSWR-2.1: Timely transposition of the revised Waste Framework Directive into national law

Timely transposition of the Waste Framework Directive as amended by Directive 2018/851, into national law within the foreseen period is key for a waste management system in line with EU requirements.

Malta transposed the amended Waste Framework Directive into national law on the 27 July 2021, more than 12 months after the deadline of 5 July 2020.

Summary result

Transposition with delay of > 12 months	Malta has transposed the amended WFD into national law with a delay of more than 12 months.
Robustness of the underlying information	Credible information received from the European Commission (status as of 12 November 2021).

SRF MSWR-2.2: Responsibilities for meeting the targets, and support and enforcement mechanisms, e.g. tools, fines etc.

Clearly defined responsibilities, enforcement and support mechanisms for meeting the targets across different entities and governance levels are important for achieving high recycling rates. The clearer the responsibilities for meeting the targets and the accountability for failing the targets are, the higher the chance that the targets will be met.

The following stakeholders have responsibilities with respect to meeting the targets of MSW recycling:

- The Government of Malta is responsible for waste policies and setting targets for recycling. The Environment and Resources Authority (ERA) is the national regulator on the environment while the Ministry for the Environment, Energy and Enterprises (MEEE) is responsible for drafting and implementing the National Waste Management Plan (NWMP) (Ministry for the Environment, Energy and Enterprises, 2022).
- The Environment and Resources Authority (ERA) is the competent authority with responsibilities for inter alia the admission of permits to waste operators and compliance and enforcement activities (Government of Malta, 2020a).
- Local and Regional Councils: Regional Councils are responsible for tendering waste management services for the Local Councils. Local Councils are responsible for the arrangement of good waste management and for setting up separate collection systems for recyclable waste and bio-waste. In line with the Waste Regulations, the Minister responsible for the environment may decide to place the obligation to attain the targets established therein on the Local Councils, or Regional Councils, or both (Government of Malta, 2011; Ministry for the Environment, Energy and Enterprises, 2021; Government of Malta, 2020b, 2020a; Ministry for the Environment, Energy and Enterprises, 2022).
- Authorised Packaging Waste Recovery Organisations: Producer Responsibility Organisations (PROs) are responsible for the financing of any systems set up for the collection, treatment, recovery and environmentally sound disposal of all municipal packaging waste generated. In this regard, they are also obliged to make arrangements with the Local Councils for the door-to-door collection of municipal packaging waste and the provision of recycling points for the separate collection of such waste. In addition, such PROs are also legally obliged to achieve the recycling targets set out in Schedule 3 of those Regulations (Ministry for the Environment, Energy and Enterprises, 2022).
- Authorised Waste Electrical and Electronic Equipment (WEEE) Collective Organisations: PROs are responsible for financing the collection, treatment, recovery and environmentally sound disposal of WEEE. In view of this, any WEEE collected through systems funded through Local Councils and deposited at designated facilities operated by the local agency, are to be handed over to the authorised PROs at a price that reflects the total cost recovery of collection and storage up to the point of take-over by the respective PRO.
- Authorised Waste Batteries Collective Organisations: PROs are responsible for financing collection, treatment and recycling of all waste batteries. In view of this, any waste batteries and accumulators collected through systems funded by Local Councils and deposited at designated facilities operated by the local agency, are to be handed over to the authorised PROs at a price that reflects the total cost recovery of collection and storage up to the point of take-over by the respective PRO.
- Waste operators are responsible for the collection and treatment of waste as well as to submit annual environment reports to ERA indicating monthly inputs and outputs per EWC code, the amount of waste exported, the final treatment operation and the final destination (Ministry for the Environment, Energy and Enterprises, 2021). The state owned company WasteServ Malta Ltd., as well as private companies collect various waste streams (EEA, 2016) .
- In accordance with Legal Notice 286 of 2018, the role of Circular Economy Malta (CEMalta), is to foster a transition towards more sustainable production and consumption patterns in both

products and services, and implement various measures, projects and initiatives for the growth and development of circular economy in Malta. Moreover, it is being tasked to increase the attractiveness of research and innovation in the private sector as well as foster public education and awareness initiatives on the appreciation of the potential of circular economy to contribute towards sustainable development (Ministry for the Environment, Energy and Enterprises, 2022).

CEMalta is also responsible to oversee the Beverage Containers Recycling Scheme (BCRS) which has the overall objective to enhance the collection and recycling of beverage containers, increase national recycling efforts and reduce litter. The recycling targets for metal, plastic and glass single use beverage containers are set in the Licence Agreement between CEMalta and BCRS Malta Ltd (Ministry for the Environment, Energy and Enterprises, 2022; Circular Economy Malta, 2020).

In the WMP 2021-2030, the need to further clarify roles and responsibilities was identified, and specific policy measure were introduced to this effect.

Malta uses several enforcement mechanisms for ensuring reaching the recycling targets. Waste operators (or any other actor) that commit an offence against the regulation will be fined or prosecuted by ERA. In addition, for non-compliance with regulations, or non-adherence to ERA's decisions or with the conditions of the permit, ERA can issue administrative fines, daily penalties or even revoke the permit. Public entities are subject to performance audits by the National Audit Office (NAO) to ensure compliance with regulations. (Ministry for the Environment, Energy and Enterprises, 2021)

Support mechanisms for enabling to meet the recycling targets focus on reporting, providing templates, training sessions, guidelines and assistance (Ministry for the Environment, Energy and Enterprises, 2021).

Summary result

Unclear responsibilities but clearly defined enforcement mechanisms and a good set of support tools for meeting the recycling targets	Based on the information provided by the Maltese authorities, it is not clear who is responsible for actually attaining the recycling targets. The enforcement mechanisms are strong, and there are some support mechanisms in place.
Robustness of the underlying information	There are some uncertainties related to the responsibilities as well as the focus of the enforcement mechanisms and whether they actually contribute to the reaching of higher recycling rates.

2.1.3 Economic instruments

SRF MSW-3.1: Taxes and/or ban for landfilling residual- or biodegradable waste

Bans and taxes on landfilling of residual municipal waste can help to discourage strong reliance on residual waste treatment and thus support recycling.

Malta has no landfill tax but the Deposit of wastes and rubble (fees) Regulations (S.L.549.07) establish in its Schedule C that the fee for landfilling of mixed waste is EUR 20 per tonne of landfilled waste. The new Waste Management Plan includes a measure whereby the Government will assess the feasibility of introducing a hierarchy of fees for facility gate fees to ensure full cost recovery for operational and environmental costs (Ministry for the Environment, Energy and Enterprises, 2022).

Summary result

No landfill tax	Malta has no landfill tax but a gate fee of EUR 20 for mixed waste deposited for landfilling.
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

SRF MSWR-3.2: Taxes on municipal waste incineration

Taxes on incineration of mixed municipal waste can help to discourage strong reliance on waste incineration and thus support recycling.

Malta does not implement a tax on incineration of MSW. Malta reported only minor levels of MSW incineration, which has decreased from 1.4 % in 2015 to 0 % in 2018 and 2019. The only waste incineration plant, the Marsa Thermal Treatment Facility, mainly incinerates industrial waste and hospital waste (Maltese Ministry for the Environment, Energy and Enterprises, 2021) and no incineration plant for MSW exists in Malta. According to the Waste Management Plan 2021-2030, Malta plans to invest in a waste incineration plant with energy recovery within four years (Ministry for the Environment, Energy and Enterprises, 2021, 2022; Ministry for the Environment, Sustainable Development and Climate Change, 2018).

Summary result

N/A (for countries without capacities for incineration)	There are no incinerators for MSW in Malta
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

SRF MSWR-3.3: Pay-as-you-throw (PAYT) system in place

PAYT systems are designed to incentivize citizens to make a bigger effort in separating their waste at source. However, a PAYT system should be designed with the appropriate level of source separation encouragement to ensure that citizens do not misplace waste in recycling bins in order to avoid residual waste charges. Overall, PAYT usually has a positive effect on source separation and thus recycling rates through direct involvement of citizens.

Malta does currently not implement a pay-as-you throw system for MSW management (Ministry for the Environment, Energy and Enterprises, 2021).

The Waste Management Plan covering the period 2021-2030 (Maltese Ministry for the Environment, Energy and Enterprises, 2021) includes a policy measure (WMRO_CW1) to explore the introduction of a service charge to implement the pay-as-you-throw concept.

The introduction of PAYT will also be coupled with additional legislative initiatives whereby waste separation at source will be made mandatory.

Summary result

No PAYT implemented but firm plans for rolling out	Currently, Malta does not have a PAYT system in place, however it has firm plans to implement one
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

2.1.4 Separate collection system

SRF MSWR-4.1: Convenience and coverage of separate collection systems for the different household waste fractions

Separate collection systems are a key enabler for high recycling rates and for collecting recyclables at adequate quality. Generally, the more convenient and accessible these systems are for their users, the better results they deliver. The assessment methodology categorises different types of collection systems (door-to-door, bring points with a density of > 5 per km^2, bring points with a density of < 5 per km^2, civic amenity site) for assessing the degree of convenience, and differentiates between cities (densely populated), towns and suburbs (intermediate densely populated) and rural (thinly populated areas). It then calculates which share of the population is served by which type of system. The assessment is done on a material basis and taking into account the different materials according to their average share in municipal waste. This is described in more detail in the methodology (ETC/WMGE, 2021).

For Malta, according to the most recent data, the percentage of households living in cities is 93 %, in towns and suburbs 7 % and in rural areas 0 % (Eurostat, 2021a).

All municipal waste fractions are collected through door-to-door collection. For bio-waste and residual waste, this is the only collection option. Bio-waste is collected three times per week. The door-to-door co-mingled collection covers paper & cardboard, metal and plastics packaging and composite packaging and is available to all households in Malta. The co-mingled collection system is financed by the Producer Responsibility Organisations (Maltese Ministry for the Environment, Energy and Enterprises, 2021). For paper and cardboard, metal, glass, plastics, textiles and composites, there are also bring points which also target non-packaging waste. Garden, wood and textiles, as well as paper and cardboard, metals, plastics, and glass waste is additionally collected at civic amenity sites. Bulky waste, including wood waste and WEEE, is collected by the local waste management service free of charge, upon request to the local council (Ministry for the Environment, Energy and Enterprises, 2021, 2022).

The same collection systems are used for high and low-rise buildings. There is no mandatory separate collection of waste generated by companies. The collection system is targeted at households only and the civic amenity sites serve only households and not businesses (Ministry for the Environment, Energy and Enterprises, 2021). Businesses will be catered by the new Multi material recovery facility which will be commissioned later in 2022 (Ministry for the Environment, Energy and Enterprises, 2022). Door-to-door collection of bio-waste was extended to the whole country in late 2018 (Maltese Ministry for the Environment, Energy and Enterprises, 2021).

For recyclable packaging, there is co-mingled door-to-door collection of paper and cardboard, metal, plastics and composite packaging. It is collected one to two times per week (Ministry for the Environment, Energy and Enterprises, 2021).

Regarding the service level, there is a nation-wide door-to-door collection of bio-waste and packaging waste, 23 bring points for separate collection of packaging waste (i.e. paper and cardboard, metal, plastics and glass) per 100 000 inhabitants, as well as six civic amenity sites. According to the Maltese Authorities, there are 169 recycling points in total in Malta. This number is expected to increase as a result of the implementation of the Waste Regulations (Ministry for the Environment, Energy and Enterprises, 2021, 2022).

Table 2.1 gives an overview of the collection system in Malta. The door-to-door and bring point collection systems used in Malta are targeted to collect packaging waste mainly but other recyclables are captured by the system. Non-packaging metals, plastics, glass, paper and cardboard are collected at civic amenity sites.

Table 2.1 Characterisation of the collection system in Malta

	Cities (densely populated areas) 92.6 %					**Towns and suburbs** (intermediate density areas) 7.4 %				
	Door-to-door - separate	Door-to-door - co-mingled	Bring point (>5 per km²)	Bring point (<5 per km²)	Civic amenity site	Door-to-door - separate	Door-to-door - co-mingled	Bring point (>5 per km²)	Bring point (<5 per km²)	Civic amenity site
Residual waste	xx					xx				
Paper and Cardboard		xx		x	x		xx		x	x
Ferrous metals		xx		x	x		xx		x	x
Aluminium		xx		x	x		xx		x	x
Glass	x			x	x	x			x	x
Plastic		xx		x	x		xx		x	x
Bio-waste	xx					xx				
food	xx					xx				
garden					x					x
Textiles				x	x				x	x
Wood	xx				x	xx				x
WEEE	x				x	x				x
Composite packaging**		xx					xx			
Other: C&D waste	x				x	x				x

Note: xx: dominant system; x: other significant systems. Grey cells indicate high convenience collection systems.

Source: Ministry for the Environment, Energy and Enterprises (2021), Ministry for the Environment, Energy and Enterprises (2022a)

Table 2.1 shows that Malta has a high coverage of door-to-door separate collection complemented by low-density bring-points and civic amenity sites. In spite of a rather convenient separate collection system, the reported amounts of recycled materials are very low, and the amount reported as composted even zero as compost is used for landscaping and landfill remediation and thus not reported as recycled.

Summary result

Paper and cardboard	A high share of the population is covered by high convenience collection services	Co-mingled collection with dry packaging, low density bring points and civic amenity sites are the available collection systems.
Metals	A high share of the population is covered by high convenience collection services	Co-mingled collection with dry packaging, low density bring points and civic amenity sites are the available collection systems.
Plastics	A high share of the population is covered by high convenience collection services	Co-mingled collection with dry packaging, low density bring points and civic amenity sites are the available collection systems.
Glass	A high share of the population is covered by high convenience collection services	Separate collection with door-to-door, bring points and civic amenity sites are the available collection systems.
Bio-waste	A high share of the population is covered by high convenience collection services	Bio-waste (food and garden waste together) is collected through door-to-door separate collection, providing a convenient system for citizens. Additionally, garden waste is collected at civic amenity sites.
Wood	A high share of the population is covered by high convenience collection services	Civic amenity sites and door-to-door bulky refuse collection systems are the available collection systems.
Textiles	A low share of the population is covered by high convenience collection services	Separate collection at low density bring points and civic amenity sites are the available collection systems.
WEEE	Medium convenience collection services dominate	Separate collection at civic amenity sites, the bulky refuse collection systems and also take back systems set up by producers or PROs are the available collection systems.
Robustness of the underlying information	There seem to be other factors hindering the effectiveness of the collection system in terms of delivering high recycling levels (such as incentives or awareness for citizens to sort waste). Despite some fractions having high convenience separate collection services, the capture rates and recycling rates are low, mainly due to the lack of related infrastructure. Additionally, in spite of the high convenience system the reported amount of composted/digested bio-waste is currently zero, as compost is mainly used for landscaping and landfill remediation.	

SRF MSWR-4.2: Firm plans to improve the convenience and coverage of separate collection for the different household waste fractions

The National Waste Management Plan (NWMP) 2021-2030 foresees a reform in the waste collection system. The door-to-door collection system will remain focussed on bio-waste, packaging waste and residual waste (Maltese Ministry for the Environment, Energy and Enterprises, 2021).

The waste management plan states out the objective to optimize (in terms of cost, schedule, routes, fleet of vehicles) and introduce regionalisation of the door-to-door separate collection system for bio-waste, packaging waste (paper and cardboard, metals, glass, plastics, and composite packaging) and for WEEE by 2023. Furthermore, there is a requirement for the number of bring-points to be established in each Local Council according to the quota stipulated in the Waste Regulations (i.e. one set of such points for the separate collection of packaging waste every 2 000 inhabitants). In addition to these improvements, a beverage container deposit return system will be implemented for

containers made of glass, PET, steel and aluminium (Maltese Ministry for the Environment, Energy and Enterprises, 2021).

The waste management plan further states out the objective by 2023 to support the establishment of repair, upgrade and reuse centres for clothing and electronics through economic incentives. Malta is in the process of opening four new reuse centres in 2022. People can obtain second hand items against a donation. Electronics will not be handled at these centres due to health and safety reasons (Maltese Ministry for the Environment, Energy and Enterprises, 2021; Ministry for the Environment, Energy and Enterprises, 2022).

Summary result

Paper and cardboard	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	The NWMP 2021-2030 envisages mandatory separation of recyclable waste from all households and commercial establishments as from 2022.
Metals	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	The NWMP2021-2030 envisages mandatory separation of recyclable waste from all households and commercial establishments as from 2022.
Plastics	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	The NWMP 2021-2030 envisages mandatory separation of recyclable waste from all households and commercial establishments as from 2022.
Glass	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	The NWMP 2021-2030 envisages mandatory separation of recyclable waste from all households and commercial establishments as from 2022.
Bio-waste	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	The NWMP 2021-2030 covering the period 2021-2030 envisages mandatory separation of bio-waste from all households and commercial establishments as from 2022.
Wood	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	Malta is planning to improve the system but no indications of improving the coverage of high convenience collection services.
Textiles	No firm plans to improve the convenience and coverage	Malta is planning to improve the system but no indications of improving the coverage of high convenience collection services.
WEEE	No firm plans to improve the convenience and coverage	Malta is planning to improve the system but no indications of improving the coverage of high convenience collection services.
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.	

2.1.5 Extended producer responsibility (EPR) and similar schemes

SRF MSWR-5.1: Fee modulation in EPR schemes for packaging

Within EPR schemes, fee modulation (or eco-modulation) is a system with different fees for different types of packaging material and designs. While basic fee modulation, i.e. different fees for the main material groups, are common, advanced fee modulation can create stronger incentives for packaging producers to design for recycling and thus create favourable conditions for higher recycling rates. The level of advancement of the fee modulation is assessed against four criteria that have been selected as benchmarks for a well-designed eco-modulated fee system:

- recyclability, for example differentiating between PET and PS, between different colours of PET, or between 100% cardboard boxes and laminated beverage cartons;
- sortability and disruptors, for example a malus for labels/caps/sleeves made of other materials, which are not fitted for the recycling technologies of the main packaging;
- recycled content; and
- if there is a transparent compliance check by the PRO that producers report correctly.

In Malta, there are two active PROs for packaging (Ministry for the Environment, Energy and Enterprises, 2021): Greenpak and GreenMT.

The EPR in Malta covers packaging waste from both household and non-household sources and covers the following materials (Ministry for the Environment, Energy and Enterprises, 2021):

- Paper and cardboard packaging
- Ferrous metals packaging
- Aluminium packaging
- Glass packaging
- Plastics packaging
- Wood packaging
- Composite packaging
- WEEE

In order to prevent free-riding of EPR obligations, ERA runs random inspections on potential free-riders. Following inspections, the Maltese Authority investigates and carries out follow ups so as to ensure that producers are compliant with the provisions of the applicable laws. For any producer which is/remains in breach of the law, further action is taken by the Authority accordingly (Ministry for the Environment, Energy and Enterprises, 2021).

EPR schemes in Malta do not utilise advanced fee modulation based on, for example, recyclability and material choice within the material group. The fees used in EPR are set by the PRO but are basic, and as such do not create incentives for design for recycling nor create favourable conditions for higher recycling rates (Ministry for the Environment, Energy and Enterprises, 2021).

Summary result

No advanced fee modulation	In Malta no advanced fee modulation system is in place.
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

2.1.6 Treatment capacity for bio-waste

SRF MSWR-6.1: Capacity for the treatment of bio-waste

Bio-waste is the largest single waste fraction in municipal waste, and adequate treatment capacity needs to be made available.

As reported by the Maltese authorities, the country's separately collected bio-waste amounts to about 33 000 tonnes in 2019. The total generation of bio-waste within the total municipal waste, including separately collected bio-waste and bio-waste present in the residual waste fraction, was estimated to be 98 000 tonnes (Table 1.1). The reported bio-waste treatment capacity of 120 000 tonnes is higher than the total generation of bio-waste (Ministry for the Environment, Energy and Enterprises, 2021).

Summary result

Enough bio-waste treatment capacity for 80% of generated municipal bio-waste	Malta reports high capacities for bio-waste treatment of which not all is in use. The capacities surpass the total bio-waste generation.
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

SRF MSWR-6.2: Legally binding national standards and Quality Management System for compost/digestate

To create a market for compost and digestate, compost should be of a good quality for use as a soil improver or fertilizer. Legally binding standards provide guarantees regarding the quality of the compost/digestate produced. A quality management system aims at addressing different elements of a production process to ensure a stable and high-quality output (product) which helps toward reaching a defined quality for the product.

A new state-of-the-art organic processing plant will be built, that will be producing high-quality compost with gas generation. Currently, Malta has neither legally binding national standards for compost/digestate quality in place, nor a quality management system, but these will be introduced once the new organic processing plant is in place (EEA, 2020; Ministry for the Environment, Energy and Enterprises, 2022).

Summary result

No national standards or quality management system	Malta has neither legally binding national standards for compost/digestate quality in place, nor a quality management system.
Robustness of the underlying information	This information is robust. It was provided by the Maltese authorities for the development of the 2020 EEA report Bio-waste in Europe – turning challenges into opportunities.

2.2 Target for the recycling of packaging waste

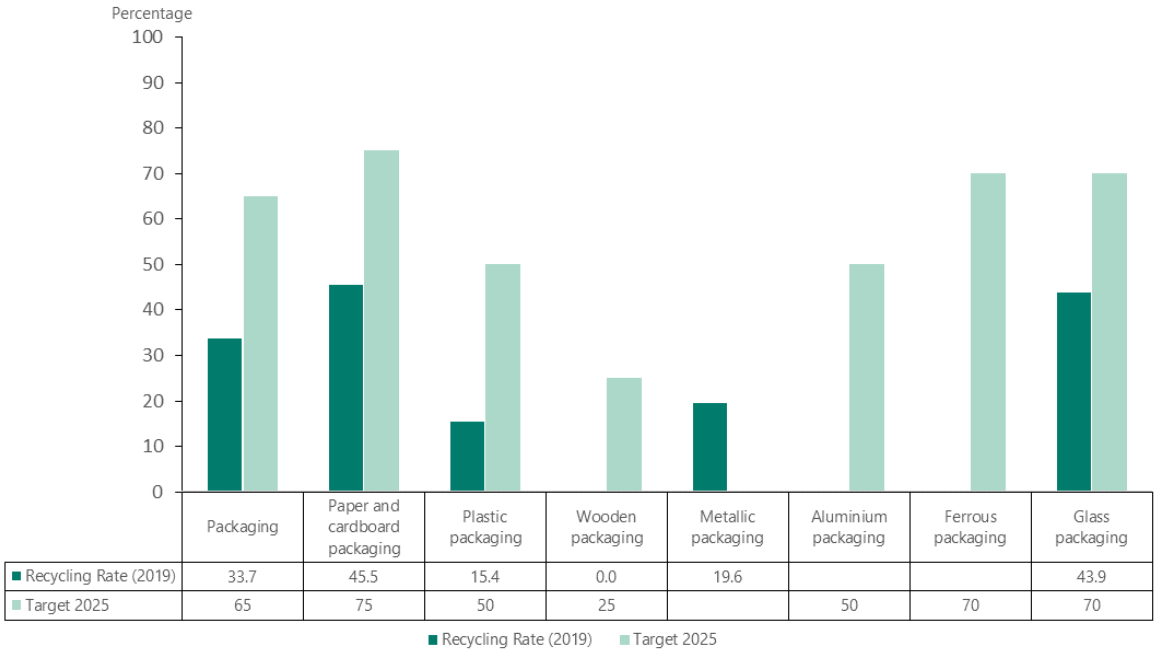
This chapter aims at assessing the prospects of Malta to achieve the **65 % recycling target for packaging waste** in 2025 as well as the **material specific packaging waste recycling targets** (50 % of plastic; 25 % of wood; 70 % of ferrous metals; 50 % of aluminium; 70 % of glass; 75 % of paper and cardboard). In order to conclude on this likelihood, the analysis takes stock of the status of several factors that are proven to influence the levels of recycling in a country. For a detailed description of the methodology followed, the development of success/risk factors and their impact on recycling, please consult the Methodology report (ETC/CE & ETC/WMGE, 2022).

2.2.1 Current situation and past trends

SRF P-1.1 Distance to target

The actual distance to the target for the most recent data point is a key factor determining the likelihood of meeting/not meeting the target. This analysis is based on data reported by Malta to Eurostat in accordance with Commission Decision 2005/270/EC as last amended by the Commission Implementing Decision 2019/665 (EC, 2019), published in the dataset *Recycling rates of packaging waste for monitoring compliance with policy targets, by type of packaging [env_waspacr]*. The latest available data refer to 2019. The performance of Malta for 2019 is illustrated in Figure 2.2.

Figure 2.2 Packaging recycling rates for Malta in 2019, in percentage



	Packaging	Paper and cardboard packaging	Plastic packaging	Wooden packaging	Metallic packaging	Aluminium packaging	Ferrous packaging	Glass packaging
Recycling Rate (2019)	33.7	45.5	15.4	0.0	19.6			43.9
Target 2025	65	75	50	25		50	70	70

Note: No data available for ferrous metals and aluminium, only for total metallic packaging.
Source: Eurostat (2022c), EU (2018)

In Malta, the recycling rates for most packaging wastes are far below the 2025 targets. For metals, the reported rates do not make a distinction between ferrous metals and aluminium, and while the combined rate for metallic packaging is above the target for aluminium packaging, it is below the target for steel packaging.

However, the recycling rates presented are based on the calculation rules of the Commission Decision 2005/270 before it was amended by the Commission Implementing Decision 2019/665 and will likely differ from the recycling rates to be reported according to the new calculation rules. The new calculation rules will only be mandatory to be used for the reference year 2020 and onwards. A key difference in the new calculation rules compared to the old rules is that the amount of sorted packaging waste that is rejected by the recycling facility shall not be included in the reported amount of recycled packaging waste.

As a matter of sensitivity analysis, to assess what the impact of these new calculation rules could be (change in calculation point), recycling losses found in literature (EXPRA, 2014) are applied to the packaging recycling rates as reported for reference year 2019:

- Paper and cardboard packaging: decrease by 10 %, from 45.5 % to 41.0 %
- Metal packaging: decrease by 14 %, from 19.6 % to 16.9 %
- Glass packaging: decrease by 5 %, from 43.9 % to 41.7 %
- Plastic packaging: decrease by 21 %[2], from 15.4 % to 12.2 %
- Wooden packaging: decrease by 11 % but is reported as 0 %
- Total packaging: Calculated based on the amounts of each packaging material generated and recycled in 2019, the recycling rate would drop from 33.7 % to 30.3 %.

Taking these recycling loss rates into account Malta would still exceed the recycling target for aluminium packaging if the recycling rates for aluminium and ferrous metal packaging are assumed to be the same, whereas the recycling rates of all other fractions as well as total packaging would be below the target levels.

Data on packaging waste generation is based on reports by the PRO, waste statistics and estimations. (Eurostat, 2020b)

Summary result

Total packaging	> 15 percentage points below target	Malta reports a recycling rate of 33.7 %. If the new calculation rules were applied (taking into account losses in the recycling plants for the different materials), the estimated recycling rate would drop to 30.3 %, 34.7 percentage points below the target.
Paper and cardboard packaging	> 15 percentage points below target	Malta reports a recycling rate of 48.4 %. If the new calculation rules were applied (taking into account losses in the recycling plants for the different materials), the estimated recycling rate would drop to 43.3 %, 31.4 percentage points below the target.

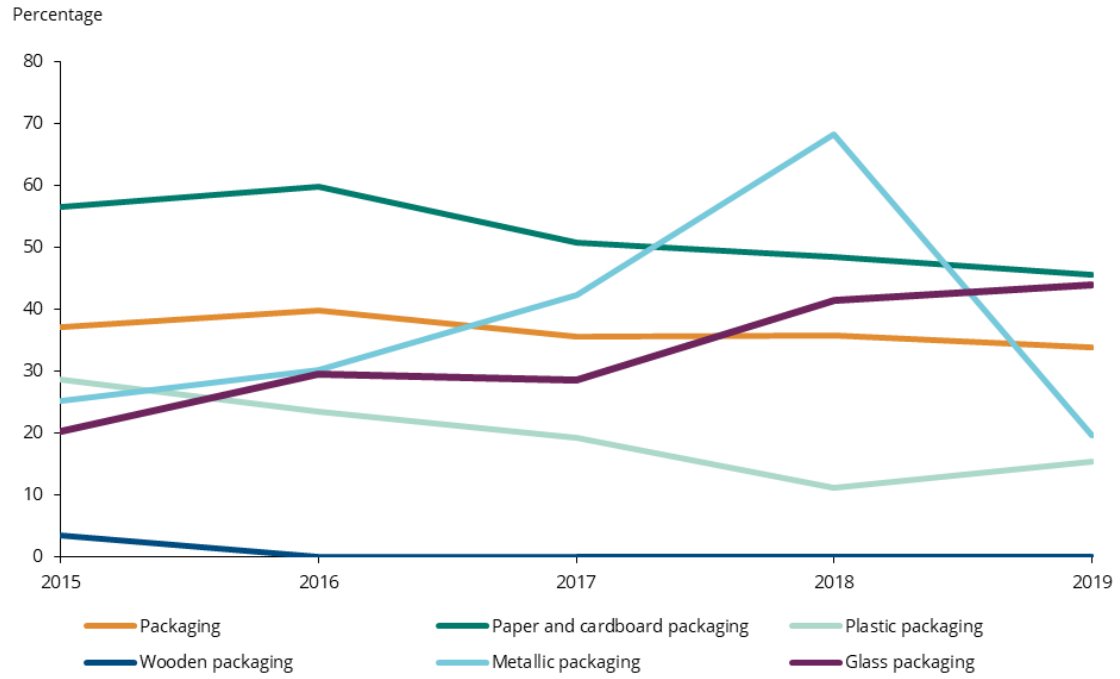
[2] This is the weighted recycling loss taking into account the 29 % recycling loss for packaging waste from household sources (66 %) and the 5 % recycling loss for packaging waste from commercial sources (33 %).

Ferrous metals packaging	> 15 percentage points below target	Malta reports a recycling rate of 19.6 % for metallic packaging. If the new calculation rules were applied (taking into account losses in the recycling plants for the different materials), the estimated recycling rate would drop to 16.9 %, 53.13 percentage points below the target for steel, and 33.1 percentage point below the target for aluminium.
Aluminium packaging	> 15 percentage points below target	
Glass packaging	> 15 percentage points below target	Malta reports a recycling rate of 41.4 %. If the new calculation rules were applied (taking into account losses in the recycling plants for the different materials), the estimated recycling rate would drop to 39.3 %, 30.7 percentage points below the target.
Plastics packaging	> 15 percentage points below target	Malta reports a recycling rate of 15.4 %. If the new calculation rules were applied (taking into account losses in the recycling plants for the different materials), the estimated recycling rate would drop to 12.2 %, 37.8 percentage points below the target.
Wooden packaging	> 15 percentage points below target	Malta reports 0 % recycling for 2019.
Robustness of the underlying information		The assessment is limited by the fact that the recycling rates for 2019 reported by Malta to Eurostat do not yet reflect the new calculation rules except for the fractions treated within the country. The impact of the new calculation rules on the other fractions has therefore been estimated based on literature. In addition, there are no separate data available for aluminium and steel packaging.

SRF P-1.2: Past trend in Packaging Waste Recycling

The development of the historical trend in the recycling rate indicates previous efforts towards packaging waste recycling. In this analysis the recycling rate reported in the Eurostat dataset *Recycling rates of packaging waste for monitoring compliance with policy targets, by type of packaging [env_waspacr]* (latest data year: 2019) is used. The recycling trends for packaging waste by material in Malta are illustrated in Figure 2.3.

Figure 2.3 Trend in packaging waste recycling in Malta between 2015 and 2019, in percentage



Source: Eurostat (2022c)

The overall packaging recycling rate in Malta has decreased with 3.4 percentage points from 37.1 % to 33.7 % during the five-year time period between 2015 and 2019. The recycling rate of metallic packaging waste shows a strong increased from 25.1 % to 68.2 % between 2015 and 2018. However, in 2019 there is a significant drop in recycling rate bringing it down to 19.4 %. Also, the recycling of glass packaging has increased from 20.3 % to 43.9 % between 2015 and 2019. Recycling of plastic packaging waste shows a strong declining trend, from 28.6 % in 2015 to 11.1 % in 2018, going back up in 2019 to 15.4 %. Recycling of paper and cardboard packaging waste shows a strong declining trend, from 56.4 % in 2015 to 45.5 % in 2019, while recycling of wooden packaging waste declined to 0 % in 2016.

Summary result

Total packaging	RR < 55% and increase in last 5 years < 10 percentage points	The recycling rate decreased by 5.4 percentage points over the past five years and is estimated at 32.9 %, if the new calculation rules would be applied (taking into account losses in the recycling plants).
Paper and cardboard packaging	RR < 65% and increase in last 5 years < 10 percentage points	The recycling rate decreased by 7.1 percentage points over the past five years and is estimated at 43.6 %, if the new calculation rules would be applied (taking into account losses in the recycling plants).

Ferrous metals packaging	RR < 60 % and increase in last 5 years < 10 percentage points	Malta does not provide separate recycling rates for ferrous metals and aluminium. The recycling rate and development over time for total metal packaging is used instead. It shows a decrease by 5.5 percentage points over the past five years, and is estimated at 16.9 % if the new calculation rules would be applied (taking into account losses in the recycling plants).
Aluminium packaging	RR < 40% and increase in last 5 years < 10 percentage points	
Glass packaging	RR < 60% and increase in last 5 years > 10 percentage points	The recycling rate increased by 10.2 percentage points over the past five years and is estimated at 39.3 %, if the new calculation rules would be applied (taking into account losses in the recycling plants).
Plastics packaging	RR < 40% and increase in last 5 years < 10 percentage points	The recycling rate decreased by 21.8 percentage points over the past five years and is estimated at 8.8 %, if the new calculation rules would be applied (taking into account losses in the recycling plants).
Wooden packaging	RR < 15% and increase in last 5 years < 10 percentage points	The recycling rate for wooden packaging was 0 %.
Robustness of the underlying information		The assessment is limited by the fact that the recycling rates for 2019 reported by Malta to Eurostat do not yet reflect the new calculation rules, and the impact of the new calculation rules has therefore been estimated based on literature. There are some uncertainties whether all packaging put on the market is reported and included in the waste generation. The assessment for ferrous metals and aluminium is uncertain as data only refers to total metals packaging.

2.2.2 Legal instruments

SRF P-2.1: Timely transposition of the revised Packaging and Packaging Waste Directive into national law

Timely transposition of the Packaging and Packaging Waste Directive as amended by Directive 2018/852, into national law within the foreseen period is key for a waste management system in line with EU requirements.

Malta has fully transposed the amended Packaging and Packaging Waste Directive into national law on 27 July 2021, which is more than 12 months after the deadline of 5 July 2021.

Summary result

Transposition with delay of > 12 months, or no full transposition yet	Malta transposed the amended Packaging and Packaging Waste Directive into national law almost 13 months after the deadline.
Robustness of the underlying information	Credible information received from the European Commission (status as of 12 November 2021).

SRF P-2.2: Responsibilities for meeting the targets, and enforcement mechanisms, e.g. fines etc.

The following stakeholders have responsibilities with respect to meeting the targets of packaging waste recycling (Ministry for the Environment, Energy and Enterprises, 2021, 2022):

- The Government of Malta is responsible for waste policies and setting targets for recycling.
- Environment and Resources Authority (ERA) is the competent authority with responsibilities for admission of permits to waste operators and compliance and enforcement activities (Government of Malta, 2020a).
- Circular Economy Malta (CEMalta): CEMalta is the designated competent entity for the Circular Economy under the Environment Protection Act.
- Local and Regional Councils; as from 2022, Regional Councils are responsible for tendering waste management service for the local councils. Local Councils are responsible for the arrangement of good waste management and for setting up separate collection schemes for recyclable waste and bio-waste (Government of Malta, 2011, 2020b; Ministry for the Environment, Energy and Enterprises, 2021).
- Authorised Packaging Waste Recovery Organisations; PROs are responsible for the financing of any systems set up for the collection, treatment, recovery and environmentally sound disposal of all municipal packaging waste generated. In this regard, they are also obliged to make arrangements with the Local Councils for the door-to-door collection of municipal packaging waste and the provision of recycling points for the separate collection of such waste. PROs and self-compliant producers of packaging are also legally obliged to achieve the recycling targets set out in Schedule 3 of those Regulations and to report data to ERA on a half-yearly and annual basis, on inter alia placement on the market, packaging waste collected and recycled etc.

Malta uses several enforcement mechanisms for ensuring reaching the recycling targets. Waste operators (or any other actor) committing an offence against the regulation will be fined or prosecuted by ERA. In addition, for non-compliance to regulations, or non-adherence to ERA's decisions or with the conditions of the permit, ERA can issue administrative fines, daily penalties or revoke the permit. Public entities are subject to performance audits by the National Audit Office (NAO) to ensure compliance with regulations (Ministry for the Environment, Energy and Enterprises, 2021).

Support mechanisms for enabling to meet the recycling targets focus on reporting, providing templates, training sessions, guidelines and assistance (Ministry for the Environment, Energy and Enterprises, 2021).

Summary result

Clearly defined responsibilities, enforcement and good set of support mechanisms for meeting the recycling targets	Based on the information provided in the questionnaire, it is clear who is responsible for attaining the recycling targets. The enforcement mechanisms are strong, and some support mechanisms are in place.
Robustness of the underlying information	There are some uncertainties related to the responsibilities as well as the focus of the enforcement mechanisms and whether they actually contribute to reaching higher recycling rates.

2.2.3 Economic instruments

SRF P-3.1: Taxes and/or ban for landfilling residual- or biodegradable waste

Bans and taxes on landfilling of residual waste can help to discourage landfilling and thus support recycling, also of packaging waste.

As described in Section 2.1.3 in more detail, Malta has no landfill tax but a gate fee of EUR 20 per tonne for mixed waste deposited for landfilling.

Summary result

No landfill tax	Malta has no landfill tax but a gate fee of EUR 20 per tonne for mixed waste deposited for landfilling.
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

SRF P-3.2: Taxes on municipal waste incineration

Taxes on incineration of residual waste can help to discourage strong reliance on residual waste treatment and thus support recycling. As described in Section 2.1.3 in more detail, there are no incinerators for MSW in Malta but a new plant is planned to be built in the coming four years (Ministry for the Environment, Energy and Enterprises, 2022).

Summary result

N/A (for countries without capacities for incineration)	There are no incinerators for MSW in Malta
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

SRF P-3.3: Packaging taxes

Packaging taxes can support the aim to reduce packaging waste generation and/or to influence the choice of packaging materials and encourage recyclability and eco-design.

According to the information available, Malta does not implement taxes on packaging (Ministry for the Environment, Energy and Enterprises, 2021).

Summary result

No packaging taxes	Malta does not implement taxes on packaging
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

SRF P-3.4: Pay-as-you-throw (PAYT) system in place

As a large share of packaging waste is generated in households, incentivising households to separate packaging waste at source, e.g. by applying PAYT systems, is relevant for meeting the recycling targets for packaging waste. According to the information available, Malta does not implement PAYT (Ministry for the Environment, Energy and Enterprises, 2021). According to the Waste Management Plan 2021-2030, introduction of PAYT is foreseen in the coming years.

Summary result

No PAYT implemented but firm plans for rolling out	Currently, Malta does have a PAYT in place, however it has firm plans to implement one.
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

SRF P-3.5: Deposit return systems

Deposit Return Systems (DRS) generate high capture rates for packaging covered by the system and thus contribute to increased recycling rates.

Malta has a voluntary DRS, where local wineries have established a DRS for their glass bottles where consumers receive EUR 0.25 for each returnable bottle that is returned to the store/wine yard. The bottles are reused for wine.

Malta is also planning to establish a centralised DRS for steel, aluminium, glass and PET bottles and cans with a capacity of 0.1–3 litres for the following beverages (Minister for the Environment, Sustainable Development and Climate Change, 2020; Maltese Ministry for the Environment, Energy and Enterprises, 2021):

- water and flavoured water;
- non-carbonated soft drinks;
- carbonated soft drinks;
- ciders, beers and other malt beverages;
- ready to drink coffee;
- flavoured alcoholic beverages with an alcohol level of less than 5%;
- dilutables

Summary result

Aluminium drink cans	No DRS for drink cans	No DRS in place
Glass drink bottles	No DRS for drink bottles	The Maltese DRS is voluntary and covers only reusable packaging from local wineries.
Plastic drink bottles	No DRS for drink bottles	No DRS in place
Plastic crates	No DRS for plastic crates	No DRS in place
Wooden packaging	No DRS for wooden packaging	No DRS in place
Robustness of the underlying information		Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire

2.2.4 Separate collection system

SRF P-4.1: Convenience and coverage of separate collection for different packaging waste fractions

As a large part of packaging waste comes from households, separate collection systems for households and similar sources are a key condition for high recycling rates for packaging waste and for collecting recyclables at adequate quality. Such systems generally deliver better results the more convenient and accessible they are for their users, also compared to the collection of residual waste. The material specific assessment considers packaging waste from both household and non-household sources. For assessing the convenience and coverage of separate collection systems for households, the same methodology is used here as described in section 2.1.4.

As described in Section 2.1.4 in more detail, the separate collection system is targeted at households only and there is no mandatory separate collection of waste generated by companies. For businesses, PROs offer a specific collection service to producers placing on the market transport packaging. Those producers of transport packaging who have opted to self-comply are obliged to ensure the

environmentally sound management of such packaging waste and attain national targets (Ministry for the Environment, Energy and Enterprises, 2021).

The separate collection system of dry recyclables is mainly targeting packaging waste. Packaging waste is mainly collected through the collection services provided for by the two existing PROs in Malta, i.e. door-to-door and bring-site collection of recyclable packaging waste (co-mingled collection of paper, cardboard, metal and plastics packaging). Glass is collected separately as a separate stream both door-to-door on a monthly basis and through bring points. There are also separate collection services for certain commercial and industrial entities (Ministry for the Environment, Energy and Enterprises, 2021).

Summary result

Paper and cardboard packaging	**1. Packaging waste from households** A high share of the population is covered by high convenience collection services	Separate collection with door-to-door, low density bring points and civic amenity sites are the available collection systems.
	2. Packaging waste from non-household sources Separation at source is not mandatory for non-household paper and cardboard packaging waste	Separate collection is not mandatory in Malta for companies.
Ferrous metals packaging	**1. Packaging waste from households** A high share of the population is covered by high convenience collection services	Co-mingled collection with dry packaging and low density bring points are the available collection systems.
	2. Packaging waste from non-household sources Separation at source is not mandatory for non-household ferrous metals packaging waste	Separate collection is not mandatory in Malta for companies.
Aluminium packaging	**Packaging waste from households** A high share of the population is covered by high convenience collection services	Co-mingled collection with dry packaging and low density bring points are the available collection systems.
Glass packaging	**1. Packaging waste from households** A high share of the population is covered by high convenience collection services	Separate collection with door-to-door and bring points are the available collection systems.
	2. Packaging waste from non-household sources Separation at source is not mandatory for non-household glass packaging waste	Separate collection is not mandatory in Malta for companies.
Plastics packaging	**1. Packaging waste from households** A high share of the population is covered by high convenience collection services	Co-mingled collection with dry packaging and low density bring points are the available collection systems.
	2. Packaging waste from non-household sources Separation at source is not mandatory for non-household plastic packaging waste	Separate collection is not mandatory in Malta for companies.

Wooden packaging	**Packaging waste from non-household sources** Separation at source is not mandatory for non-household wooden packaging waste	Separate collection is not mandatory in Malta for companies.
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire. Despite some fractions having high convenience separate collection services, the capture rates and recycling rates are low.	

Note: The main source for aluminium packaging waste is drink cans from households, therefore the assessment does not consider aluminium non-household waste.

SRF P-4.2: Firm plans to improve the convenience and coverage of separate collection for the different packaging waste fractions

Concrete plans are needed to improve the convenience and coverage of separate collection. This SRF is more relevant for MS and materials that do not score 'green' in SRF P-4.1. The assessment is done on a material basis, and summing up the scores of the different materials according to their average share in packaging waste[3]. Again, the material specific assessment considers packaging waste from both household and non-household sources.

As described in Section 2.1.4 in more detail, the NWMP states out the objective to optimize and introduce regionalization of the door-to-door separate collection system for packaging waste and to increase the number of bring-points by 2023. Furthermore, as described in Section 2.2.3 the introduction of a DRS for beverage containers made of glass, PET, steel and aluminium is planned.

Summary result

Paper and cardboard packaging	**1. Packaging waste from households** N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	The NWMP envisages mandatory separation of recyclable waste from all households as from 2022.
	2. Packaging waste from non-household sources Firms plans to introduce mandatory sorting at source for non-household paper and cardboard packaging waste	The NWMP envisages mandatory separation of recyclable waste from all commercial establishments as from 2022.
Ferrous metals packaging	**1. Packaging waste from households** N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	The NWMP envisages mandatory separation of recyclable waste from all households as from 2022.
	2. Packaging waste from non-household sources Firms plans to introduce mandatory sorting at source for non-household ferrous metals packaging waste	The NWMP envisages mandatory separation of recyclable waste from all commercial establishments as from 2022.
Aluminium packaging	**Packaging waste from households** N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	The NWMP envisages mandatory separation of recyclable waste from all households as from 2022.

[3] Based on data from Eurostat on the share of packaging materials in total packaging generated in 2018.

Glass packaging	**1. Packaging waste from households** N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	The NWMP envisages mandatory separation of recyclable waste from all households as from 2022.
	2. Packaging waste from non-household sources Firms plans to introduce mandatory sorting at source for non-household glass packaging waste	The NWMP envisages mandatory separation of recyclable waste from all commercial establishments as from 2022.
Plastics packaging	**1. Packaging waste from households** N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	The NWMP envisages mandatory separation of recyclable waste from all households as from 2022.
	2. Packaging waste from non-household sources Firms plans to introduce mandatory sorting at source for non-household plastic packaging waste	The NWMP envisages mandatory separation of recyclable waste from all commercial establishments as from 2022.
Wooden packaging	**Packaging waste from non-household sources** Firms plans to introduce mandatory sorting at source for non-household wooden packaging waste	The NWMP envisages mandatory separation of recyclable waste from all commercial establishments as from 2022.
Robustness of the underlying information		Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

2.2.5 Extended producer responsibility (EPR) and similar schemes

SRF P-5.1: Coverage of EPR schemes

As described in Section 2.1.5 in more detail, in Malta there are two active PROs covering packaging waste from both household and non-household sources and covering all packaging materials.

Summary result

All main packaging fractions([a]) are covered by EPR schemes, covering household and non-household packaging	In Malta, there is an EPR system in place, covering packaging waste from both household and non-household sources for all packaging materials
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

([a]) **Note:** Paper and cardboard, Ferrous metals, Aluminium, Glass, Plastic

SRF P-5.2: Fee modulation in EPR schemes for packaging

As explained in Section 2.1.4, fee modulation (or eco-modulation) is a system with different fees for different types of packaging material and designs. The assessment is the same as described in Section 2.1.4

As described in Section 2.1.5 in more detail, Malta does not apply fee modulation in the EPR scheme.

Summary result

No advanced fee modulation	Malta does not apply fee modulation in the EPR scheme.
Robustness of the underlying information	Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

SRF P-5.3 Material specific EPR assessment

The material specific assessment is based on a combination of the coverage of the material-specific EPR schemes and the use of fee modulation for the specific packaging material. The assessment takes the different situations for different types of materials into account: Plastics packaging is the packaging material that is the most difficult to recycle out of the packaging materials targeted by the Packaging and Packaging Waste Directive. Fee modulation therefore plays a larger role for plastic packaging than for the other materials and is therefore rated differently from paper/cardboard, ferrous metals, aluminium and glass. The methodology foresees a green score for plastics packaging only if all four fee modulation assessment criteria mentioned above are met. On the other hand, wooden packaging is mainly generated by commercial and industrial sources and fee modulation is less relevant, therefore the methodology only relies on EPR schemes for wooden packaging from commercial and industrial sources.

As, described in Section 2.1.5, the EPR covers packaging waste from both household and non-household sources and the EPR in Malta does not apply fee modulation.

Summary result

SRF P-5.3.1 EPR scheme for Paper and cardboard packaging waste	EPR scheme covering household and non-household packaging	Malta does not apply fee modulation in the EPR scheme. The EPR scheme covers packaging waste from both household and non-household sources.
SRF P-5.3.2 EPR scheme for Ferrous metals packaging waste	EPR scheme covering household and non-household packaging	Malta does not apply fee modulation in the EPR scheme. The EPR scheme covers packaging waste from both household and non-household sources.
SRF P-5.3.3 EPR scheme for Aluminium packaging waste	EPR scheme covering household and non-household packaging	Malta does not apply fee modulation in the EPR scheme. The EPR scheme covers packaging waste from both household and non-household sources.
SRF P-5.3.4 EPR scheme for Glass packaging waste	EPR scheme covering household and non-household packaging	Malta does not apply fee modulation in the EPR scheme. The EPR scheme covers packaging waste from both household and non-household sources.
SRF P-5.3.5 EPR scheme for Plastic packaging waste	EPR scheme without fee modulation	Malta does not apply fee modulation in the EPR scheme. The EPR scheme covers packaging waste from both household and non-household sources.
SRF P-5.3.6 EPR scheme for Wooden packaging waste	EPR scheme covering all non-household packaging	The EPR scheme covers packaging waste from all non-household sources.
Robustness of the underlying information		Credible information received from the Maltese authorities through the EEA-ETC/WMGE questionnaire.

2.3 Target on landfill of municipal waste

2.3.1 Current situation and past trends

SRF LF-1.1: Distance to target

The Landfill directive (1999/31/EC), as amended by Directive (EU) 2018/850, sets a target to reduce, by 2035, the amount of municipal waste landfilled to 10 % or less of the total amount of municipal waste generated (by weight).

Data to show the current rate of landfilling in line with the reporting rules will only be reported by mid-2022. Therefore, this analysis calculates the landfilling rate based on the current Eurostat dataset *Municipal waste by waste management operations [env_wasmun]*; by dividing the amount of landfilled waste by the total amount of waste generated. The overall landfilling rate of Malta was 82.5 % in 2020 (calculated based on (Eurostat, 2022a)).

The Maltese authorities expect the landfill rate to decrease once the new state of the art facilities within the ECOHIVE Complex come to life (see Section 1.3). (Ministry for the Environment, Energy and Enterprises, 2022)

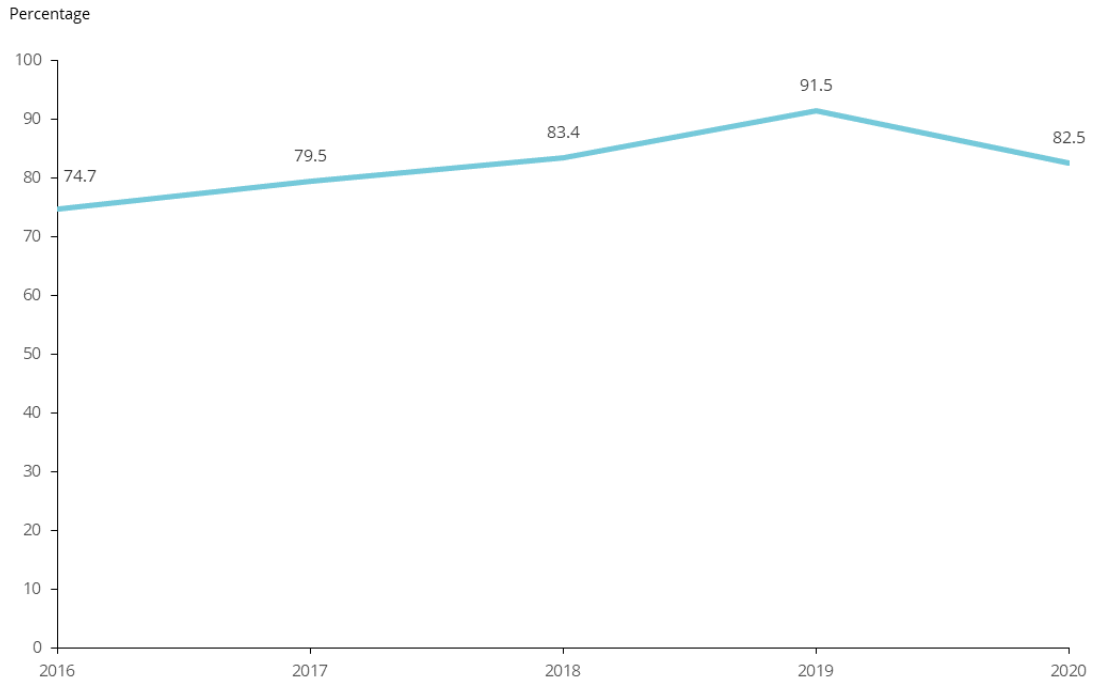
Summary result

Distance to target > 20 percentage points	The overall landfilling rate of Malta was 82.5 % (2020), 72.5 percentage points from reaching the target.
Robustness of the underlying information	The data is derived from Eurostat and is considered to be rather robust. However, the reported landfill rate might increase once the new calculation rules laid down in the Commission Implementing Decision (EU) 2019/1885 will be applied. Based on the available information, it is currently not possible to quantify the impact of the new calculation rules on the landfill rate.

SRF LF-1.2: Past trend in municipal solid waste landfill rate

Over the past five years, the overall landfilling rate of Malta remained very high, increasing from 74.7 % in 2016 to 91.5 % in 2019 and then dropping to 82.5 % in 2020 (Figure 2.4).

Figure 2.4 Landfilling in Malta between 2015 and 2019, in percentage



Source: Eurostat (2022a)

Summary result

Landfill rate in 2020 > 25% and decrease in last 5 years < 15 percentage points	The overall landfilling rate of Malta was 82.5 % (2020), and has increased by 7.8 percentage points in the last five years.
Robustness of the underlying information	The data is derived from Eurostat and is considered to be rather robust. There is no break in the time series data.

SRF LF-1.3: Diversion of biodegradable municipal waste from landfill

According to Art. 5(2c) of the EU Landfill Directive, Member States had to ensure that by 2016, biodegradable municipal waste going to landfill is reduced to 35 % of the total amount (by weight) of biodegradable municipal waste produced in 1995 or the latest year before 1995 for which standardised Eurostat data is available. However, Malta benefits from a four year derogation period and thus has to meet the target by 2020.

Malta reported to have generated 141 000 tonnes of biodegradable municipal waste in the reference year 1995. In 2019, Malta landfilled 257 974 tonnes of biodegradable municipal waste, corresponding to 182 % related to the reference year 1995 (Ministry for the Environment, Energy and Enterprises, 2022). Malta is therefore far away from the target.

Summary result

Target for reducing the amount of biodegradable municipal waste (BMW) landfilled to 35% of BMW generated in 1995 has not been achieved in 2016 or in the year specified in the derogation where applicable.	Malta has reported 182 % biodegradable waste landfilled in 2019 in comparison to the biodegradable waste generated in 1995 and performs therefore far from the target.
Robustness of the underlying information	The data has been provided by the Ministry for the Environment, Energy and Enterprises and can be considered robust.

3 Conclusion

This risk assessment indicates whether Malta is at risk of not meeting the targets. The 'total risk' categorization is the result of the sum of the individual scores of each SRF as described in the previous chapter, where the assessment of each SRF results in a score of **2 points (green), 1 point (amber) or 0 points (red)**, depending on the assessment of the SRF. As some SRFs are considered to have a higher impact on meeting the target, the score of the SRF is multiplied by the defined weight of the SRF. As some SRFs might not be applicable to Malta, only the SRFs relevant to Malta are taken into account to define the maximum score. Malta is considered to be 'not at risk' if its score is more than 50 % of this maximum score, and 'at risk' if its score is less than 50 % of this maximum score.

3.1 Prospects for meeting the recycling target for municipal solid waste

26 % **of maximum score**	Based on the provided information and the analysis done, it is concluded that Malta is **at risk for not meeting the MSW recycling target in 2025**.
Current situation and past trends:	The recycling rate was 10.5 % in 2020, 44.5 percentage points below the 2025 target of 55 %. Considering however the impact of the new calculation rules, we assume a reduction with 5 percentage points for this assessment, resulting in an estimated recycling rate of 5.5 %, still well below the target. The recycling rate has been decreasing since 2016. The setting up of new waste treatment facilities within the ECOHIVE complex can be expected to increase the recycling rate.
Legal instruments:	The amended WFD has fully transposed into national law but with a delay of more than 12 months. The Government of Malta is responsible for waste policies and setting targets for recycling while Local Councils are responsible for the arrangement of good waste management and for setting up separate collection schemes. The enforcement mechanisms towards municipalities and service providers are strong and some support measures are in place.
Economic instruments:	Malta has no landfill tax but a gate fee of EUR 20 per tonne for mixed waste deposited for landfilling. There are no incinerators for MSW in Malta. Malta does not implement a pay-as-you throw system for MSW collection, however, it has firm plans to implement one.

Separate collection systems:	The modest generation of residual waste in Malta (45 %) shows that the current separate collection system provides a somewhat high service level but the low recycling rate indicates that the sorting quality is quite poor. A high share of the population is covered by high convenience collection services for paper and cardboard, metals, plastics, bio-waste and glass as well as wood (through bulky waste collection). A medium share of population is covered by high convenience collection services for WEEE. A low share of population is covered by high convenience collection services for textiles. The waste management plan states out the objective to optimize and introduce regionalization of the door-to-door separate collection system for bio-waste, packaging waste and WEEE. There are no indications of how these improvements can impact the coverage of high convenience collection services.
Extended producer responsibility:	EPR schemes are in place for packaging waste from households and non-households, but there is no fee modulation.
Bio-waste treatment capacity and quality management:	Bio-waste treatment capacity is high and it is not all in use. The capacities surpass the total bio-waste generation. Malta has neither legally binding national standards for compost/digestate quality in place, nor a quality management system, but plans to introduce this once the new organic processing plant is in place.

3.2 Prospects for meeting the recycling targets for packaging waste

25 % **of maximum score**	Based on the provided information and the analysis done, it can be concluded that Malta is **at risk for not meeting the packaging waste recycling targets in 2025 for total packaging waste**.	
24 % of maximum score	Paper and cardboard	At risk
24 % of maximum score	Ferrous metals packaging	At Risk
27 % of maximum score	Aluminium packaging	At Risk
26 % of maximum score	Glass packaging	At Risk
18 % of maximum score	Plastics packaging	At Risk
22 % of maximum score	Wooden packaging	At Risk
Current situation and past trends:	The total packaging recycling rate (applying the new calculation rules) is 30.3 %, 34.7 percentage points below the 2025 target of 65 %. Data is not available for aluminium packaging. The target for aluminium recycling nor the one for ferrous metals are reached. Also other packaging waste streams are more than 15 percentage points below the targets. The total packaging recycling rate has decreased by 5.4 percentage points over the past five years. The recycling of paper and cardboard, plastics and wooden packaging waste has also decreased over the past five years. There are some uncertainties whether all packaging put on the market is reported and included in the waste generation, and the assessment for ferrous metals and aluminium are uncertain as data only refers to total metals packaging.	
Legal instruments:	The amended Packaging and Packaging Waste Directive has been transposed, but with a delay of almost 13 months The Government of Malta is responsible for waste policies and setting targets for recycling while Local Councils are responsible for the arrangement of good waste and for setting up separate collection schemes and the PROs are responsible for collection and treatment of packaging waste. The responsibility for attaining recycling targets are on the PROs and self-compliant producers of packaging. The enforcement mechanisms towards municipalities and service providers are strong, and some support measures are in place.	

Economic instruments:	Malta has no landfill tax but a gate fee of EUR 20 per tonne for mixed waste deposited for landfilling. There are no incinerators for packaging waste in Malta. Malta does not implement taxes on packaging. Malta does not apply a pay-as-you throw system that could incentivise separating packaging waste at source, but there is the firm plan to implement one. Malta has a no DRS in place but is planning the establishment of such a system.
Separate collection systems:	The separate collection system serves only households and separate collection in Malta is not mandatory for companies. A high share of population is covered by high convenience collection services for paper and cardboard, metals, plastics and glass.The waste management plan states out the objective to optimize and introduce regionalization of the door-to-door separate collection system for packaging waste. There are no indications of how these improvements can impact the coverage of high convenience collection services. The NWMP envisages mandatory separation of packaging waste from all households and commercial establishments as of 2022
Extended producer responsibility:	There is an EPR system in place, covering packaging waste from both household and non-household sources for all packaging materials. However, no advanced fee modulation is applied to improve the design of packaging towards better recyclability.

3.3 Prospects of meeting the landfill of municipal waste target

0 % **of maximum score**	Based on the provided information and the analysis done, it is concluded that Malta is **at risk for not meeting the 2035 target to reduce the amount of municipal waste landfilled to 10 % or less of the total amount of municipal waste generated.**
Current situation and past trends:	The Landfill rate in 2019 was 82.5 %, and has increased by 7.8 percentage points in the past five years. Malta benefits from a four year derogation period and thus has to meet the target of Art. 5(2c) of the EU Landfill Directive by 2020. Malta reported to have generated 141 000 tonnes of biodegradable municipal waste in 1995, and landfilled 257 974 tonnes in 2019, thus 182 % in comparison to the reference year. Malta performs therefore far from the target. The landfill rate can be expected to decrease once the new facilities within the ECOHIVE Complex will be operational.

List of abbreviations

Abbreviation	Name
DRS	Deposit Return System
EC	European Commission
EEA	European Environment Agency
Eionet	European Environmental Information and Observation Network
EPR	Extended producer responsibility
ERA	Environment and Resources Authority
ETC/CE	European Topic Centre on Circular Economy and resource use
ETC/WMGE	European Topic Center / Waste and Materials in a Green Economy
EWC	European Waste Codes
MBT	Mechanical biological treatment
MRF	Material Recovery Facility
MS	Member state
MSW	Municipal solid waste
PAYT	Pay-as-you-throw
PET	Polyethylene terephthalate
PPWD	Packaging and Packaging Waste Directive
PRO	Producer Responsibility Organisation
RDF	Refused Derived Fuel
RR	Recycling rate
SRF	Success and risk factor
WEEE	Waste Electric and Electronic Equipment
WFD	Waste Framework Directive

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Annex 1 Implementation of previous early warning recommendations

In 2018, the European Commission assessed that Malta would be at risk of not meeting the Waste Framework Directive's target to prepare for re-use and recycle at least 50 % of municipal waste, and provided a set of policy recommendations to improve the situation (EC, 2018a). This annex lists the recommendations and a self-assessment of the Malta authorities on the status of taking them into account.

Recommendations on Responsibility for waste collection and data management

1) Amendment of the Local Councils Act on responsibility for waste and recycling, clarifying the role of Wasteserv and other stakeholders in household waste collection systems (including packaging and bio-waste), including by:

- *making the local councils responsible for the collection of all household waste. This would include residual, recycling and organic waste.*
- *clarifying the roles and responsibilities alongside funding obligations. This would allow the services (and their financing) provided by producer responsibility organisations (PROs), local councils, Wasteserv and commercial operators to be better coordinated.*

Following the recommendations of the previous early warning, the Local Councils Act was amended in 2019 stating that as of 2022, the Regions shall also be responsible for the collection of waste within the local councils within their territories. In addition, the Waste Regulations oblige Local Councils to set up systems for the separate collection of waste, the provision of space for the installation of recycling points according to the quota stipulated therein, and the Regional Councils shall ensure that such systems are set and space provided.

Malta considers the recommendation **implemented.**

2) Setting out reporting requirements on local councils for waste managed within their locality, including requirement to report data on household waste and recycling, as well as any commercial or other waste streams they manage. This would allow poor performers to be identified more easily for better targeted actions. It would also enable underperforming councils to be held to account.

Following the recommendations of the previous early warning, the Waste Regulations (S.L. 549.63) have been amended to include a provision where the competent authority may request the Regional and Local Councils to report data to the competent authority regarding separately collected recyclables and bio-waste.

Malta considers the recommendation partially **implemented.**

3) Implementation of a programme to prevent commercial businesses from free-riding within household waste collection services, including:

- *an obligation on local councils to provide/arrange for the collection of commercial waste from premises within their locality if requested to do so.*
- *an adequate service charge to be paid by the businesses for waste collection and disposal to the authority or company that arranges it.*

The Waste Management Plan 2021-2030 establishes that a PAYT system will be implemented for commercial establishments as of 2023, aiming to incentivise waste prevention and correct separation. The plan also proposes mechanisms to collect a waste fee from companies using the public waste collection services.

Malta considers the recommendation **partly implemented.**

4) Compilation of independent data on household waste and commercial waste recycling, while ascribing any recyclate losses at sorting facilities as accurately as possible to either commercial or household sources.

As part of the permit conditions, waste operators must engage an independent auditor to certify all the waste reporting requirements. In cases where waste is sent for treatment or recovery to another facility locally or abroad, the audit trail shall cover all waste from the point of generation or collection to the end recovery or disposal facility. Moreover, the Authority (ERA) may request additional commission audits. Furthermore, Regulation 15 of the Waste Management (Packaging and Packaging Waste) Regulations, requires producers to acquire a signed recycling certificate declaration, and that the packaging waste has been recovered or disposed of in an environmentally sound manner.

Malta considers the recommendation **partly implemented.**

5) Conducting a major audit of collection performance to identify system inefficiencies preventing higher yields of recyclables.

The Waste Management Plan 2021-2030 recognises the need to reform the collection system to increase economies of scale, harmonise collection practices and improve efficiency.

Malta considers the recommendation **implemented.**

Recommendations on Separate collection

6) Development of national minimum service standards for waste collection (including bio-waste) to specify, for example, the type and volume of containers, minimum and maximum frequency of collection and type of vehicle used, taking into account the type of housing stock, typical climate, etc.

The Waste Management Plan 2021-2030 describes how Malta shall reform the waste collection system which transitions towards a regionalised approach to address the lack of economies of scale, including service standards for modelling waste collection systems. In addition, the plan identifies the need for upgrading the fleet of vehicles by looking into alternative fuel and vehicle technology.

Malta considers the recommendation **partly implemented.**

Recommendations on Technical support to local councils

7) Development of a system at national level that provides technical support for local councils, specifically in the following areas:

a) choosing collection services;
b) service procurement;
c) service management;
d) communication campaigns;

coupled with active sharing of good ideas and practices that can improve efficiency in terms of cost reduction and improvement in performance.

The Waste Management Plan 2021-2030 sets out to reform waste collection services by moving towards a regionalised approach which will lead to increased economies of scale, harmonised collection practices and modernised collection fleets resulting in a more efficient collection system.

As part of the regionalisation process, Regional Councils are currently recruiting different officers, such as: environmental officers, waste management officers, cultural officers, ICT officers, funds administrator officers and project management officers.

The waste management officer will be responsible for a number of functions including:

- managing the waste management contracts of all Local Councils under the responsibility of the Region, while monitoring operations and suggesting improvements on how standards can be raised;
- providing assistance in the design and management of waste collection contracts;
- assisting the Regional Council to achieve the objectives as set out in the national strategy;
- assisting the Regional Council in drawing up a joint plan with the respective Local Councils to jointly establish areas such as bring-in sites and other innovative waste management initiatives;
- providing assistance to Local Councils in promoting and educating for more knowledge on waste management;
- collecting and maintaining statistics on waste levels in localities within the Local Region through a report every 6 months as well as assisting the Executive Secretary in reports concerning this area to ensure effective, efficient and expeditious operations;
- assisting the respective Local Councils in initiatives and projects related to waste management while responsible for the monitoring of projects, as well as preparing and monitor progress reports and any type of report as required on projects or initiatives;
- a progress / performance report shall be submitted to the Local Government Division every three months and by not later than 10 working days from the Regional Council meeting;

Malta considers the recommendation **implemented.**

Recommendations on Communication and awareness raising

8) Development of a set of national communications materials addressed to the public for use at local level, with clear and consistent messages, and with particular focus on bio-waste. These materials should be used as part of awareness-raising campaigns, in leaflets and at civic amenity sites.

A number of awareness raising campaigns have been launched during the past years, namely the Don't Waste Waste and the Sort it Out campaigns to promote, waste prevention in various stages and proper management of various waste streams; as well the Saving our Blue campaign, which aim is to raise awareness about the harmful impact of single-use plastics and littering in public places. In 2022, the Government launched a recycling campaign entitled 'Separate Right Make our Future Bright' targeting all age groups, but especially kids as it believes that it is crucial to educate the future generations in terms of sustainability and environment.

Malta considers the recommendation **implemented.**

Recommendations on Economic incentives for households and local councils

9) Introduction of complementary economic incentives for households in the form of pay-as-you-throw schemes.

The Waste Management Plan 2021-2030 introduces the concept of PAYT to households via the prizing of waste bags to incentivise separate collection whilst heavily reducing landfilling.

Malta considers the recommendation **partly implemented.**

10) Introduction of 'top-down' mandatory recycling targets for local councils, in addition to minimum standards of service, as an incentive for councils to take the appropriate care to implement and operate

high-quality recycling services and meet their targets, accompanied by specific fines for non-compliance, e.g. by significantly increasing the landfill tax or applying non-compliance fees to every tonne of waste disposed of above the target level.

The Waste Regulations as amended by the L.N.146 of 2021, stipulate that the Minister responsible for the environment may place the obligation to attain the preparing for reuse and recycling targets on the local councils or the Regional councils or both.

The Waste Management Plan 2021-2030 recognises the need to regionalise the waste collection system to improve efficiency, enhance economies of scale, permits the introduction of standards and facilitates monitoring. In addition, the government will assess the feasibility of introducing a hierarchy of fees for facility gate fees to ensure full cost recovery for operational and environmental costs, thus better reflecting the principle of waste management hierarchy.

The overall aim is to be able to increase the amount of recyclables collected for recycling in a timely and effective manner.

Malta considers the recommendation **partly implemented.**

Recommendations on Spending of EU funds

11) In terms of funding requirements in the coming years, the specific focus should be on projects supporting higher levels in the waste hierarchy, including separate collection, bio-waste treatment plants and sorting facilities.

The Waste Management Plan 2021-2030 provides an overview of the waste management and the required infrastructure to effectively and efficiently manage waste. In order to improve capacity for waste management, various projects are currently in different phases of development, including investment in a new Material Recovery Facility and a new Organic Processing Plant.

A Multi-Material Recovery Facility will also be opened in Hal Far in 2022 and will accommodate the commercial sector and will take material such as mattresses, wood, gypsum and so on.

Marsascala Education Centre, will serve as an educational hub with activities and games targeting all age groups especially children (https://www.wsm.com.mt/en/article?id=5b52fe27-771e-41aa-9a5f-d97de3e9e22b).

Malta considers the recommendation **partly implemented.**

Recommendations on Extended Producer Responsibility (EPR) schemes

12) Detailed market monitoring by the Environment and Resources Authority (or via third-party annual audits) to audit all producers and gain a much clearer understanding of packaging waste (and other waste streams).

In the Waste Management Plan 2021-2030, Malta acknowledges that improving EPR goes hand in hand with improving the surveillance, compliance and enforcement of EPR obligations. To this end, necessary steps will be taken to ensure the timely auditing of the operations of all producers and the PROs. The New Waste Management Plan also recognises the vital importance to enhance cooperation with the Government entities responsible for competition and financial matters with a view to enable the Competent Authorities to perform a regular and detailed monitoring of the national market vis-à-vis EPR obligations. Furthermore, audits of certain packaging producers and related producer responsibility organisations have already been carried out to ensure that they are compliant with S.L. 473.05 Eco-Contribution (Exemptions) Regulations. While these audits have been carried out specifically in order to ensure compliance with the Eco-Contribution Regulations and not to the Packaging and Packaging Waste regulations, the synergies that exist between the two legislation allow those audits to also ensure that the operations of the PROs are in line with the Packaging Regulations.

Malta considers the recommendation **partly implemented.**

13) Strengthening the regulator's capacity to enable better enforcement of producer registration and fee collection, including for imported packaging.

The capacity of the compliance and enforcement directorate within the ERA has already been increased and strengthened throughout the past years however this needs to be strengthened further. Nonetheless, the Waste Management Plan 2021-2030 recognizes the need to further increase the administrative and technological capacity of the Compliance and Enforcement Directorate within the ERA.

Malta considers the recommendation **partly implemented.**

14) Thorough review of EPR schemes to identify shortcomings in the current system (and also to assess it in the light of new general minimum requirements for EPR schemes laid down in the revised Waste Framework Directive).

The Waste Management Plan 2021-2030 identifies the main short comings in the current EPR system and provides for measures to allow for the new general requirements for EPR schemes laid down in the revised Waste Framework Directive to be implemented. Furthermore, acknowledging the complexity and horizontal nature of EPR, the EPR Framework Regulations (S.L.549.141) mandate the establishment of an EPR consultative committee to assist the national regulator on the environment to perform its duties vis-à-vis the implementation of the EPR principle in Malta.

Malta considers the recommendation **partly implemented.**

15) Consideration of increasing the packaging targets to be met by PROs.

The targets to be reached by the PRO are in line with the targets laid down in the Packaging and Packaging Waste Regulations (S.L. 549.43) transposing the Packaging and Packaging Waste Directive.

Malta considers the recommendation **not implemented.**

16) Ensuring that the costs of collection and recycling or disposal of packaging are fully covered by packaging waste producers. This would help to reduce the burden on local authorities related to the funding required for the separate collection and onward management of waste.

The Waste Management Plan 2021-2030 states that the Government will take the necessary steps to ensure that producers and PROs bear the full costs of the management of the waste arising from the products placed on the national market, including the costs for collection and treatment of waste streams and the cost of enforcement.

Malta considers the recommendation **partly implemented.**

17) Implementation of a deposit refund system for beverage containers in line with the government's planning.

In 2020, Malta has published the Beverage Containers Recycling Regulations, which introduces a Beverage Containers Refund Scheme (BCRS) targeting the collection and recycling of beverage containers.

Malta considers the recommendation **implemented.**

Annex 2 Detailed scoring of success and risk factors

Assessment sheet - Recycling target for municipal waste

MS Malta

Date Jun-22

SRF		Assessment result	Weight	Score
Current situation and past trends				
MSWR-1.1	Distance to target	Distance to target > 15 percentage points or no data reported	5	0
MSWR-1.2	Past trends in municipal solid waste recycling rate	RR < 45% and increase in last 5 years < 10 percentage points	1	0
Legal instruments				
MSWR-2.1	Timely transposition of the revised WFD into national law	Transposition with delay of > 12 months, or no full transposition yet	1	0
MSWR-2.2	Clearly defined responsibilities for meeting the targets and support and enforcement mechanisms	Clearly defined responsibilities and good set of support tools but weak/no enforcement mechanisms for meeting the recycling targets OR Unclear responsibilities but clearly defined enforcement mechanisms and a good set of support tools for meeting the recycling targets OR Clearly defined responsibilities and enforcement mechanisms but no/weak support tools for meeting the recycling targets	1	1
Economic instruments				
MSWR-3.1	Taxes and/or ban for landfilling residual or biodegradable waste	No landfill taxes or low tax (< 30 EUR/t*)	1	0
MSWR-3.2	Taxes on municipal waste incineration	N/A (for countries without capacities for incineration)	1	0
MSWR-3.3	Pay-as-you-throw (PAYT) system	PAYT scheme implemented in some regions/ municipalities (50-80% of population covered) OR No or less than 50% of the population covered by PAYT but firm plans for rolling out	1	1

Separate collection systems				
MSWR-4.1	Convenience and coverage of separate collection systems for the different household waste fractions			
	Paper and cardboard	A high share of the population is covered by high convenience collection services	0.46	0.92
	Metals	A high share of the population is covered by high convenience collection services	0.08	0.16
	Plastics	A high share of the population is covered by high convenience collection services	0.28	0.56
	Glass	A high share of the population is covered by high convenience collection services	0.18	0.36
	Bio-waste	A high share of the population is covered by high convenience collection services	0.84	1.68
	Wood	A high share of the population is covered by high convenience collection services	0.06	0.12
	Textiles	A low share of the population is covered by high convenience collection services	0.06	0
	WEEE	Medium convenience collection services dominate	0.04	0.04
MSWR-4.2	Firm plans to improve the convenience and coverage of separate collection systems for the different household waste fractions			
	Paper and cardboard	N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	0.23	0
	Metals	N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	0.04	0
	Plastics	N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	0.14	0
	Glass	N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	0.09	0
	Bio-waste	N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	0.42	0
	Wood	N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	0.03	0
	Textiles	No firm plans to improve the convenience and coverage	0.03	0
	WEEE	No firm plans to improve the convenience and coverage	0.02	0

Extended producer responsibility (EPR) and similar schemes				
MSWR-5.1	Fee modulation in EPR schemes for packaging	No advanced fee modulation OR fee modulation meets less than two assessment criteria	1	0
Bio-waste treatment capacity and quality management				
MSWR-6.1	Capacity for the treatment of bio-waste	Enough bio-waste treatment capacity for 80% of generated municipal bio-waste	1	2
MSWR-6.2	Legally binding national standards and Quality Management System for compost/digistate	No national standards or quality management system, or still under development	1	0
			Total score	**7.84**
			Maximum score	30.10
				26%

Assessment sheet - Recycling target for packaging waste

MS Malta

Date Jun-22

SRF		Assessment result	Weight	Score
Current situation and past trends				
P-1.1	Distance to target - Overall packaging	> 15 percentage points below target, or no data reported	5	0
	Distance to target - Paper and cardboard packaging	> 15 percentage points below target, or no data reported	5	0
	Distance to target - Ferrous metals packaging	> 15 percentage points below target, or no data reported	5	0
	Distance to target - Aluminium packaging	> 15 percentage points below target, or no data reported	5	0
	Distance to target - Glass packaging	> 15 percentage points below target, or no data reported	5	0
	Distance to target - Plastics packaging	> 15 percentage points below target, or no data reported	5	0
	Distance to target - Wooden packaging	> 15 percentage points below target, or no data reported	5	0
P-1.2	Past trends in packaging waste recycling rate	RR < 55% and increase in last 5 years < 10 percentage points	1	0
	Past trends in paper and cardboard packaging recycling	RR < 65% and increase in last 5 years < 10 percentage points	1	0
	Past trends in ferrous metals packaging recycling	RR < 60% and increase in last 5 years < 10 percentage points	1	0
	Past trends in aluminium packaging recycling	RR < 40% and increase in last 5 years < 10 percentage points	1	0
	Past trends in glass packaging recycling	RR > 65% and increase in last 5 years < 5 percentage points, or RR > 60%, and increase in last 5 years < 10 percentage points, or RR < 60% and increase in last 5 years > 10 percentage points	1	1

	Past trends in plastic packaging recycling	RR < 40% and increase in last 5 years < 10 percentage points	1	0
	Past trends in wooden packaging recycling	RR < 15% and increase in last 5 years < 10 percentage points	1	0
Legal instruments				
P-2.1	Timely transposition of the revised Packaging and Packaging Waste Directive into national law	Transposition with delay of > 12 months, or no full transposition yet	1	0
P-2.2	Clearly defined responsibilities for meeting the targets and support and enforcement mechanisms	Clearly defined responsibilities, enforcement and good set of support mechanisms for meeting the recycling targets	1	2
Economic instruments				
P-3.1	Taxes and/or ban for landfilling residual or biodegradable waste	No landfill taxes or low tax (< 30 EUR/t*)	1	0
P-3.2	Taxes on municipal waste incineration	N/A (for countries without capacities for incineration)	1	0
P-3.3	Packaging taxes	No packaging taxes	1	0
P-3.4	Pay-as-you-throw (PAYT) system	PAYT scheme implemented in some regions/ municipalities (50-80% of population covered) OR No or less than 50% of the population covered by PAYT but firm plans for rolling out	1	1
P-3.5	Deposit-return systems for aluminium drink cans	No or voluntary DRS for some drink cans	1	0
	Deposit-return systems for glass drink bottles	No or voluntary DRS for some drink bottles	1	0
	Deposit-return systems plastic drink bottles	No or voluntary DRS for some drink bottles	1	0
	Deposit-return systems for plastic crates	No or voluntary DRS for some plastic crates	1	0
	Deposit-return systems for wooden packaging	No or voluntary DRS for some wooden packaging	1	0

Separate collection systems				
P-4.1	Convenience and coverage of separate collection systems for the different packaging waste fractions			
	Paper and cardboard packaging (household)	A high share of the population is covered by high convenience collection services	1	2
	Paper and cardboard packaging (non-household)	Separation at source is not mandatory for non-household paper and cardboard packaging waste	1	0
	Ferrous metals packaging (household)	A high share of the population is covered by high convenience collection services	1	2
	Ferrous metals packaging (non-household)	Separation at source is not mandatory for non-household ferrous metals packaging waste	1	0
	Aluminium packaging	A high share of the population is covered by high convenience collection services	2	4
	Glass packaging (household)	A high share of population is covered by high convenience collection services	1	2
	Glass packaging (non-household)	Separation at source is not mandatory for non-household glass packaging waste	1	0
	Plastics packaging (household)	A high share of the population is covered by high convenience collection services	1	2
	Plastics packaging (non-household)	Separation at source is not mandatory for non-household plastic packaging waste	1	0
	Wooden packaging	Separation at source is not mandatory for non-household wooden packaging waste	2	0
P-4.2	Firm plans to improve the convenience and coverage of separate collection systems for the different packaging waste fractions			
	Paper and cardboard (household)	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	0.5	0
	Paper and cardboard (non-household)	Firm plans to introduce mandatory sorting at source for non-household paper and cardboard packaging waste	0.5	1
	Ferrous metals packaging (household)	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	0.5	0
	Ferrous metals packaging (non-household)	Firm plans to introduce mandatory sorting at source for non-household ferrous metals packaging waste	0.5	1
	Aluminium packaging	N/A (for countries in which a high share of the population is already covered by high convenience collection services)	1	0
	Glass packaging (household)	N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	0.5	0
	Glass packaging (non-household)	Firm plans to introduce mandatory sorting at source for non-household glass packaging waste	0.5	1

	Plastics packaging (household)	N/A (for countries in which a very high share of the population is already covered by high convenience collection services)	0.5	0
	Plastics packaging (non-household)	Firm plans to introduce mandatory sorting at source for non-household plastics packaging waste	0.5	1
	Wooden packaging	Firm plans to introduce mandatory sorting at source for non-household wooden packaging waste	1	2
Extended producer responsibility (EPR) and similar schemes				
P-5.1	Coverage of EPR schemes	All main packaging fractions* are covered by EPR schemes, covering household and non-household packaging	1	2
P-5.2	Fee modulation in EPR schemes for packaging	No fee modulation OR fee modulation meets less than two assessment criteria	1	0
P-5.3	Material specific EPR assessment - Paper and cardboard packaging waste	EPR scheme covering household and non-household packaging	1	1
	Material specific EPR assessment - Ferrous metals packaging waste	EPR scheme covering household and non-household packaging	1	1
	Material specific EPR assessment - Aluminium packaging waste	EPR scheme covering household and non-household packaging	1	1
	Material specific EPR assessment - Glass packaging waste	EPR scheme covering household and non-household packaging	1	1
	Material specific EPR assessment - Plastics packaging waste	No EPR scheme or EPR scheme covering only household, industrial OR commercial packaging OR EPR scheme but without fee modulation	1	0
	Material specific EPR assessment - Wooden packaging waste	EPR scheme covering all non-household packaging	1	2
Total packaging recycling target				**7.86**
			Maximum score	31.14
				25%

Paper and cardboard recycling target

Total score	**7.00**
Maximum score	29.00
	24%

Ferrous metals packaging recycling target

Total score	**7.00**
Maximum score	29.00
	24%

Aluminium packaging recycling target

Total score	**8.00**
Maximum score	30.00
	27%

Glass packaging recycling target

Total score	**8.00**
Maximum score	31.00
	26%

Plastics packaging recycling target

Total score	**6.00**
Maximum score	33.00
	18%

Wooden packaging recycling target

Total score	**7.00**
Maximum score	32.00
	22%

Assessment sheet - Target for landfilling of municipal waste

MS Malta

Date Jun-22

SRF		Assessment result	Weight	Score
Current situation and past trends				
LF-1.1	Distance to target	Distance to target > 20 percentage points, or no data reported	5	0
LF-1.2	Past trends in municipal solid waste landfill rat	Landfill rate in 2020 > 25% and decrease in last 5 years < 15 percentage points	1	0
LF-1.3	Diversion of biodegradable municipal waste from landfill	Target for reducing the amount of biodegradable municipal waste (BMW) landfilled to 35% of BMW generated in 1995 has not been achieved in 2016 or in the year specified in the derogation where applicable, or data not reported. Or in case of derogation: Target for reducing the amount of biodegradable municipal waste (BMW) landfilled to 35% of BMW generated in 1995 has not been achieved yet and available data indicate that it is unlikely to be achieved	1	0
			Total score	**0.00**
			Maximum score	14.00
				0%