

March 2009

Alternattiva Demokratika – The Green Party’s response to ‘A Solid Waste Management Strategy for the Maltese Islands - Consultation Document - January 2009’

The 2001 Solid Waste Management Strategy aims at attaining zero waste status. The update to this Strategy published last January by Government for public discussion does not examine how the different measures taken since 2001 assist in reaching this aim.

In particular it does not examine the targets attained by the Eco-Contribution Act intended as a waste management tool. This legislation had a dual role:

1. Increasing the price of a number of items unduly straining the waste stream thereby attempting to nudge consumption to a less damaging direction.
2. Application of the polluter pays principle.

A major objective of the Solid Waste Management Strategy is the reduction of waste generated. Within the context of the waste hierarchy this objective should have been the major priority in the exercise to update the strategy. Such an assessment should identify those waste streams which can be tackled. This can only be done through an analysis of the waste generated in Malta. As far as is known no such analysis has been carried out, or if it has it is under wraps. This type of research is crucial in order to produce the necessary tools for policymakers. Other jurisdictions have identified the throw-away society as a major contributor to the growing waste mountain. AD, in the absence of such studies, believes that the Waste Strategy update fails to address this growing phenomenon.

The strategy update is not holistic. It postpones consideration of electric and electronic waste, as well as waste oils and end of life vehicles. In addition it does not tackle the relevance of scrap-yards as one of the areas which need to be regulated if waste is to be really managed.

AD shares the general objectives of the Waste Management Strategy but feels that insufficient efforts are being injected to avoid the generation of waste. Within this context it is submitted that the proposal for the setting up of an incinerator is in AD's view being tackled inadequately. There is a clear danger that the incineration issue will be viewed as a policy solution to waste management and consequently the risk of its being adopted as an easy solution will in effect mean that government is discarding or discounting waste avoidance as an active objective.

With this in mind AD considers that the Waste Strategy Update should be revisited and substantially redrafted. AD is willing to assist in such an exercise.

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