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From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

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To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject: COMMISSION STAFF WORKING DOCUMENT  
The early warning report for Malta  
*Accompanying the document*  
REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target

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Delegations will find attached document SWD(2023) 195 final.

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SWD(2023) 195 final

**COMMISSION STAFF WORKING DOCUMENT**

**The early warning report for Malta**

*Accompanying the document*

**Report From The Commission To The European Parliament, The Council, The European Economic And Social Committee And The Committee Of The Regions**

**identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target**

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## 1. Introduction

The early warning report aims to assist Member States at risk of failing to meet: (i) the 2025 target of 55% for the preparing for re-use and the recycling of their municipal waste (this target is set out in Article 11(2)(c) of Directive 2008/98/EC); and (ii) the 2025 target of 65% for the recycling of their packaging waste (this target is set out in Article 6(1)(f) of Directive 1994/62/EC). It also provides an update on how Member States are performing against the 2035 target to send no more than 10% of their municipal waste to landfill (this target is set out in Article 5(5) Directive 1999/31/EC).

This report builds on previous support provided by the Commission to help Member States comply with EU law on municipal waste management, including, where relevant, the early warning report from 2018<sup>1</sup>.

The assessment underpinning the early warning report identified 18 Member States at risk of missing the 2025 preparing for re-use and recycling target for municipal waste, 10 of which are also at risk of missing the 2025 recycling target for all packaging waste.

This assessment is based on a collaborative and transparent process involving the Member States concerned, the European Environment Agency<sup>2</sup>, and an in-depth analysis of the most recent policy developments in the Member States. This process also involved extensive consultation with the Member State authorities in charge of waste management. The possible actions identified during this process are based on existing best practices and aim to help Member States meet the 2025 targets, and as such they focus on policy measures which can be taken in the short term. These actions should be seen as complementary to those recommended in the roadmaps which were drawn up as part of preceding compliance-promotion activities and to those recommended in the Environmental Implementation Review<sup>3</sup>.

## 2. Key findings

Based on an analysis of existing and planned policies in the area of waste management, Malta is considered to be at risk of missing: (i) the 2025 target of 55% for the preparing for re-use and the recycling of its municipal waste; and (ii) the 2025 target to recycle 65% of its packaging waste. There is also a large gap between the percentage of municipal waste currently sent to landfill and the 2035 target that no more than 10% of municipal waste should be landfilled.

In 2020, the municipal waste recycling rate (including composting) reported by Malta to Eurostat was 10.5%, while the landfill rate was 82.5% (over three times the EU average). In addition, Malta is also lagging behind when it comes to: (i) the recycling target for all packaging waste (only 40% of which is recycled compared with an EU target of 65 %); and (ii) recycling targets for most material-specific packaging-waste streams (such as plastics, metals and glass). General recycling trends in Malta are also of concern: the recycling rate for municipal waste has decreased slightly in recent years, falling by 2.2 percentage points between 2016 and 2020 from 12.7% to 10.5%. The recycling rate for packaging waste has also fallen, by 3.4 percentage points from 37.1% to 33.7% between 2015 and 2019; in 2020 the recycling rate for all packaging

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<sup>1</sup> An early-warning report was issued for Malta in 2018 (SWD(2018) 421 final). A total of 17 recommendations were provided. According to the Maltese authorities, 6 of the report's recommendations are considered as being implemented, 10 partially implemented, and 1 not implemented.

<sup>2</sup> EEA and ETC/CE (2022). Early Warning Assessment Related to the 2025 Targets for Municipal and Packaging Waste (<https://www.eea.europa.eu/publications/country-profiles-early-warning-assessments>)

<sup>3</sup> European Commission (2022). Environmental Implementation Review 2022. COM/2022/438 final. ([https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=comnat%3ACOM\\_2022\\_0438\\_FIN](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=comnat%3ACOM_2022_0438_FIN))

waste increased to 40%. The percentage of municipal waste sent to landfill increased by 7.8 percentage points between 2016 and 2020 from 74.7% to 82.5%.

Some of the main challenges in waste management include:

- low capture rates of recyclable waste in the separate collection system (40% for dry recyclables and 34% for biowaste). The high touristic activity in Malta – approximately 2.5 million tourists per year – presents specific challenges to increasing the capture rates;
- insufficient infrastructure for recycling of waste instead of landfilling (i.e. insufficient sorting-plant capacity for separately collected waste and for commingled dry recyclables);
- limited use of compost (i.e. compost is used for landscaping and landfill remediation instead of recycling for agricultural purposes).

It is acknowledged that several actions have been recently put in place by Malta to reverse the current situation and achieve the targets<sup>4</sup>. However, this has not yet resulted in measurable effects. Significant improvements are needed to bring Maltese waste-management practices into line with the EU's waste hierarchy.

### **3. Key recommendations**

Among the measures deemed necessary to support Malta's efforts to improve its performance in waste management, three main recommendations are listed below.

1. Support preparing for re-use of municipal waste and re-use systems for packaging.
2. Further invest in infrastructure for separate collection, sorting and recycling.
3. Implement a pay-as-you-throw system for both businesses and households.
4. Ensure that compost and digestate from biowaste treatment plants are used for land improvement and fertilising.

The table below lists a number of possible actions to support Malta's efforts to improve its performance in waste management.

### **4. Good practices**

The following measures implemented by Malta are considered good practices that help to improve its recycling performance:

- Campaigns to raise awareness of sound waste management – Several campaigns have been conducted to raise awareness among the general public of waste prevention, source separation, waste collection, and the fight against littering. These campaigns included the creation of materials for schools and pupils such as comics on waste management (see Ecohive kids<sup>5</sup>).
- Development of an integrated waste management infrastructure – Malta has developed a new waste management infrastructure in a highly integrated manner. It did this by adding to existing treatment capacity and building brand-new treatment capacity for activities such as waste incineration, material recovery, biowaste processing, etc. This approach will make it possible to achieve economies of scale and significant synergies for waste management (see Ecohive project<sup>6</sup>).

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<sup>4</sup> Malta has started to plan and commission several additional treatment plants, and is also working to improve the collection systems for dry recyclables and biowaste. Ecohive (<https://www.ecohive.com.mt/>).

<sup>5</sup> <https://www.ecohive.com.mt/kids>.

<sup>6</sup> <https://www.ecohive.com.mt/#>

## OVERVIEW OF POSSIBLE ACTIONS TO IMPROVE PERFORMANCE

### Governance

- 1) Clearly identify the authorities and entities responsible (at national, regional, and waste-operator level) for achieving the target of 55% for the preparing for re-use and the recycling of municipal waste.
- 2) Set mandatory objectives or indicators for separate waste collection at the level of the bodies in charge of collecting municipal waste (e.g. municipalities) in order to monitor, enforce and achieve higher capture rates. This could be complemented with performance-bound financial rewards and penalties dependant on the achievement of the targets. Information on the performance of municipalities could also be made available to the general public to raise awareness (e.g. by publishing on a website).

### Prevention

- 3) Take measures to increase re-use and to prevent the generation of non-recyclable municipal waste.
- 4) Ensure proper monitoring of the implementation of waste prevention measures, including through appropriate qualitative or quantitative indicators and targets and sufficient resources for this monitoring. Promote coordination between the central and the local government to achieve the EU's waste-prevention objectives.

### Separate collection

- 5) Improve the convenience of separate collection systems and require businesses to have their waste streams collected separately to increase capture rates for dry recyclables and biowaste and reduce landfilling. Malta should aim to double its capture rate and improve the purity of its waste fractions. The challenges posed by tourism to separate collection should also be duly considered.

### Waste treatment

- 6) Support preparing for re-use of municipal waste and develop waste treatment infrastructure that focuses on the higher steps of the waste hierarchy. Build sufficient sorting capacity and ensure that the sorted waste is of sufficiently high quality to be accepted by recycling plants. This will ensure that pre-sorted waste is destined for recycling and reduce landfilling and incineration; extension of the treatment plants is foreseen.
- 7) Compost and digestate from biowaste treatment plants should be used for land improvement and as fertiliser. To ensure production of high-quality compost/digestate across the country, national standards for the quality of compost/digestate should be implemented by means of a quality-management system. To ensure acceptability among the users of this digestate (such as the farming community), the relevant parties should be involved in developing these standards.

### **Communication and awareness raising**

- 8)** Maintain and strengthen activities to raise awareness of waste prevention, littering and separate collection (especially in areas related to tourism, such as hotels and restaurants). Develop a set of national communication materials addressed to different target groups (e.g. households, commercial waste generators, schoolteachers, and students) for use at local level, with clear and consistent messages. These materials should be used as part of awareness-raising activities, in leaflets, on social media, on the internet, and at civic amenity sites.

### **Extended producer responsibility and economic instruments**

- 9)** Set up a pay-as-you-throw system for both businesses and households to attain higher capture rates for recyclable fractions and reduce residual waste. Local authorities could be supported through guidance on how to design the incentive mechanisms and how to introduce and learn from pilot projects.
- 10)** Implement economic instruments (e.g. raising landfill taxes to a sufficiently high level and introducing an incineration tax) to incentivise waste management associated with the higher steps of the waste hierarchy. This will help to make reuse, preparing for reuse and recycling economically attractive, and reduce dependency on landfilling. The economic incentives should be sufficiently large and designed to be effective and steer waste management up the waste hierarchy. Landfill taxes that increase over time in correlation to specific targets are considered the most effective.
- 11)** Stepping up efforts to establish reuse systems for packaging will bring environmental benefits and help Member States in complying with the EU packaging recycling targets.