



GOVERNMENT OF MALTA

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**Government response to the Transposition of the remaining Articles of the Single Use Plastics Directive (Single-Use Plastic Framework Regulations, 2021; Restrictions on Placing on the Market of Single-Use Plastic Products (Amendment No 2) Regulations, 2021; Beverage Containers Recycling (Amendment) Regulations, 2021)**

October 2022

Environment and Resources Authority  
Hexagon House, Spencer Hill,  
Marsa MRS 1441

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# Executive Summary

## Introduction and overview

On 15th December 2021, the Environment and Resources Authority (ERA), in collaboration with the Ministry responsible for the Environment, published the draft *Single-Use Plastic Framework Regulations, 2021*, the draft *Restrictions on Placing on the Market of Single-Use Plastic Products (Amendment No 2) Regulations, 2021*; and the draft *Beverage Containers Recycling (Amendment) Regulations, 2021* for public consultation.

These Legal Notices were primarily drafted to transpose Directive (EU) 2019/904 on the reduction on the impact of certain plastic products on the environment (known as the Single Use Plastic or SUP Directive), which was adopted by the EU in July 2019. The aim of the Directive (EU) 2019/904 is to prevent and reduce the impact of certain plastic products on the environment, in particular the aquatic environment, and on human health, as well as to promote the transition to a circular economy with innovative and sustainable business models, products and materials, thus also contributing to the efficient functioning of the internal market.

The SUP Directive targets the most commonly found single-use plastic (SUP) items on European beaches as well as fishing gear through a suite of different measures tailored to achieve the most effective results, whilst also taking into account the availability of more sustainable alternatives. Such measures range from market restrictions and separate collection for recycling targets to consumption reduction measures, marking and other product requirements as well as new Extended Producer Responsibility (EPR) obligations.

Furthermore, through the proposed amendments to the Restrictions on Placing on the Market of Single-Use Plastic Products Regulations (S.L. 549.140) two measures emanating from the National SUP Strategy for Malta, whereby additional SUP products should be subject to market restrictions, are being implemented.

The Legal Notices were published for public consultation from 15th December 2021 to 9th February 2022 in line with Article 55(1) of the Environment Protection Act (Cap. 549).

The objective of the public consultation was to invite the public to make submissions to ERA with their comments as to why and how these regulations could be amended in line with articles 55(1) of the Environment Protection Act (Cap. 549).

This consultation sought views on why and how these regulations could be amended in line with articles 55(1) of the Environment Protection Act (Cap. 549).

## Responses to the consultation and process used to seek stakeholder views

This document is the Government Response to this consultation and sets out the Government's decisions on these matters.

The *Single-Use Plastic Framework Regulations, 2021*, the *Restrictions on Placing on the Market of Single-Use Plastic Products (Amendment No 2) Regulations, 2021*; and the *Beverage Containers Recycling (Amendment) Regulations, 2021* were jointly subject to an eight-week public consultation period, which ran from 15th December 2021 to 9th February 2022. The public consultation was available online on the ERA and [konsultazzjoni.gov.mt](http://konsultazzjoni.gov.mt) websites. In addition 2 consultation meetings were held.

In total, 45 submissions were received, including from the Malta Chamber of Commerce, Malta Chamber of SMEs, private businesses, and the general public. The queries received as well as ERA's replies are set out in Annex A. The verbal submissions received during the stakeholder meetings are also included in the Annex and were duly taken into consideration.

A consultation meeting for stakeholders was held on 17th January 2022 and a consultation meeting for the public was held on 18th January 2022. The verbal submissions received during this meetings were duly also taken into consideration.

## Summary of responses and decisions

The following is a summary of the consultation responses received. We would like to thank all those who took the time to respond to the consultation and participate in stakeholder meetings around the consultation exercise.

### 1. Statistics.

- Total feedback received: 45
- Total feedback received by individuals: 22
- Total feedback received by organisations: 23
- Total feedback received through email: 14
- Total feedback received through online form: X
- Total feedback received by post: X

Feedback was received from various economic operators, two organisations representing local businesses, individuals and one Producer Responsibility Organisation (previously referred to as waste compliance Scheme). The Feedback received as part of this consultation mainly consisted of requests for clarifications on certain provisions established in the draft Legal Notices as well as queries related to already existing waste legislation establishing market restrictions on certain SUP products and lightweight plastic carrier bags. Proposals as to how the marking requirements emanating from the SUP Directive as well as other key provisions of the SUP Framework Regulations could be implemented were also put forward.

Upon thorough consideration of the feedback received, no legislative changes to the three draft Legal Notices were deemed necessary due to the nature of the contributions received, although replies to the queries have been formulated and presented in Annex A below. Having said so, prior to the publication of the Legal Notices, a few minor amendments were carried out to said Legal Notices, which however were of editorial or clarifying nature, or due to established EU and national procedures.

## Implementation

The Legal Notices were published as Legal Notices 235, 236 and 237 of 2022 on 16<sup>th</sup> September 2022.

## Contact Details

If you have any questions regarding this response, please contact: [era.policy@era.org.mt](mailto:era.policy@era.org.mt)

## Annex A: List of respondents

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Joseph Hili 04/01/2022	Irregistrat ghal webinar ta 17/01 , imma nixtieq nkun naf x se naghmlu bl istock li baqghalna tal plastic, bhal plastic spoons, plastic cups tal ice cream , xi ftit plastic straws ? Se jintremew , reciklati , migbura jew hadd ma jaf xejn ?	<p>Il-liġi li tipprojbixxi l-bejgħ ta' oġġetti tal-plastik mniżżlin fil-lista giet ippubblikata fl-24 ta' Diċembru 2021 bħala Avviż Legali 499 tal-2021. Skont dan l-Avviż Legali, din il-projbizzjoni għandha tidhol fis-seħħ xahrejn wara l-pubblikazzjoni tagħha, jiġifieri fl-24 ta' Frar 2022. Wara din id-data , l-ebda stock bħal dan mhu se jiġihalla jintuża, anki jekk jingħata b'xejn, bħala parti minn attività kummerċjali.</p> <p>Jista' jkun possibbli li ssir donazzjoni mingħajr flus lil xi organizzazzjoni tal-karità.</p> <p>Barra minn hekk, nifhmu li t-tazzi tal-ġelat imsemmija fl-email tiegħek huma fir-realtà kontenituri tal-ikel, peress li jintużaw biex iservu l-ikel (jiġifieri ġelat). F'dan il-każ, kontenituri tal-ikel bħal dawn mhumiex projbiti, sakemm:</p> <ul style="list-style-type: none"> <li>• huma magħmulin minn jablo u jintużaw biex ikun fihom porzjon wieħed ta' ġelat (kontenituri tal-ġelat family-size mhumiex projbiti, anki jekk ikunu magħmula minn jablo); jew</li> <li>• fihom plastik oxo-degradabbli.</li> </ul> <p>Min-naħa l-oħra, jekk qed tirreferi għal tazzi wżati għax-xorb, ġentilment innota li t-tazzi magħmulin mill-jablo huma kollha pprojbiti.</p>
2	Andrew Aquilina 13/01/2022	Further to the new regulations in place as of January 2022, some members have asked for clarification which I would like to clarify with you if possible.	With respect to single-use plastic containers, the <i>Restrictions on Placing on the Market of SUP Products Regulations</i> , S.L. 549.140 ( <a href="#">link</a> ) as amended by L.N. 499 of 2021 ( <a href="#">link</a> ), specifically target food containers made of expanded polystyrene (i.e. Jablo) used for ready-to-eat food that is usually consumed from the receptacle, as well as all products

		<p>Basically, I would like to ask if members can still give out one time single use plastic bags when purchasing from the cheese counter and one time single use small plastic containers (e.g. when purchasing olives, dips etc.)</p> <p>My impression is that, since there is direct contact with food, this is still allowable but wanted to make sure before I advise our members.</p> <p>In these cases, normally the HS codes used are:</p> <p>Plastic bags = 11x14hd Hinged container = V62</p>	<p>made from oxo-degradable plastic. Hence, if the small food containers referred to in your email are not made from jablo (and are used for ready-to-eat food usually consumed from the receptacle) and do not contain any oxo-degradable additive, they are not banned.</p> <p>With respect to plastic carrier bags, bags with a wall thickness below 15 microns required for hygiene purposes or provided as primary packaging for loose food when this helps to prevent food wastage are exempt from the prohibitions laid down in S.L. 549.139, the Restrictions on Placing on the Market of Lightweight Plastic Carrier Bags Regulations (<a href="#">link</a>). To put it simply, if the bags provided to clients at the cheese counter have a wall thickness below 15 microns and <u>are in direct contact with food</u> (i.e. they are primary packaging), they are very lightweight plastic carrier bags and therefore are exempt from the prohibitions established therein. Finally, as already indicated, all products (thus including plastic bags) made from oxo-degradable plastic are banned.</p>
	20/01/2022	<p>In the meantime, we have received an enquiry re use of large bags (with no handles) an example is plastic bags used by dry cleaners (for hygiene purposes).</p> <p>In such cases, are they still permissible or do they need to be replaced with biodegradable bags / bags with less than 30 microns?</p>	<p>Bags used by dry cleaners to return to customers their own piece of clothing, bed linen, etc., are not subject to the restrictions laid down in <a href="#">S.L. 549.139</a>. Such bags are not considered lightweight plastic carrier bags within the meaning of the said Regulations, as they are not supplied at the point of sale to consumers to carry goods or products.</p>
3	Windsor Kiosk 14/01/2022	<p>In 2021 i knew about the ban on imported plastics so i did not buy plastics to use in my kiosk from when i was aware of the import ban.</p> <p>I was watching the news this week and learned of the ban of using one time plastics after Feburary 20th.</p>	<p>The applicable national law, that is S.L. 549.140, bans the use of single-use plastic cutlery, plates and beverage stirrers, as well as all products made from oxo-degradable plastic in the course of a commercial activity, after 24 February 2022.</p>

		<p>I have a summer time kiosk and because of Covid the village feasts stopped, tourism slowed down and business in general slowed down.</p> <p>In early 2020 before covid. I had purchased some plastic cutlery, spoons and things. But because of covid I used much less stock than usual. Therefore I have stock left over.</p> <p>I only work the few summer months with the kiosk. I cannot just throw away the current stock that I have already. This stock I have had for years.</p> <p>With banning imports Malta will be soon be finished with single use plastics. But i do not think its fair that because of covid the stock I purchased 2 years ago needs to thrown away in the garbage. This is lots of money wasted in the garbage.</p> <p>That is throwing money away and that is not good for anyone.</p> <p>Can I at least use my current stock without getting fined?</p> <p>Can you please help me and other kiosk/takeaway business's in my shoes?</p>	
4	<p>Ryan Farrugia 17/01/2022</p>	<p>I trust this email finds you well. I am writing with a query on your Single-Use Plastics Legislation. We import pet disinfectant wipes, would these fall under the legislation?</p>	<p>If those pet disinfectant wipes are sold only through professional distribution channels e.g. business-to-business channels, and used by healthcare professionals, they are considered to be intended for professional use and would not be included in the scope of the Directive.</p> <p>However, wet wipes which are sold in business-to-consumer channels and distributed to non-professional consumers, e.g. wet wipes which can be</p>

			<p>purchased by individual consumers and used at home, are not considered as professional use but as domestic use. These products are therefore included in the scope of the Directive and draft national legislation.</p> <p>As long as they are sold for domestic use, single-use plastic "pet wipes" fall under the proposed legislation and are therefore subject to relevant obligations, e.g. marking requirements and Extended Producer Responsibility.</p>
5	<p>Maria Portelli 17/01/2022</p>	<p>I have a question related to pizza lid supports. If I recall well during the presentation I noticed that they were listed as banned, however I'm not sure whether they can still be used until this Legal notice comes into force and therefore I kindly ask you to clarify this for me.</p>	<p>Pizza lid supports will be banned from being placed on the national market two months following the publication of the draft amendment to the S.L. 549.140 as indicated in the said amendment. To put it simply:</p> <ul style="list-style-type: none"> <li>• Before the prohibition comes into force, pizza lid supports can still be imported or manufactured locally;</li> <li>• Once the prohibition enters into force, pizza lid supports that have already been placed on the market, can still be sold/provided until the stocks end.</li> </ul>
6	<p>Edward Green Roots 17/01/2022</p>	<p>I have a question. We import our paper cups from Germany . The paper cups we import do not have a plastic or PLA lining on the inside. The coating is defined as follows :</p> <p><b>“Environmentally friendly coating:</b> Our organic cups are coated with dispersion varnish. The varnish consists of water and resin, protecting the cup against moisture penetration. The coating is <b>fully biodegradable</b>. The cups can be recycled <b>with paper waste after use.</b>”</p> <p>When sold in Germany, these do not require the SUPD logo on .</p>	<p><i>See reply below</i></p>

	<p>What information would you need us to present such that our paper cups can be exempted from having the SUPD logo and test on ?</p> <p>If you need further information on the coating of the paper cups, please feel free and let me know. This is a very recent coating process and it was done specifically to remove the plastic coating from the cups so much so that these cups can be recycled with normal paper unlike traditional paper cups</p>	
20/01/22	<p>Do you have any updates about the paper cups with water based coating rather than plastic coating ?</p>	<i>See reply below</i>
22/01/22	<p>Our supplier from Germany has sent the below information</p> <p>“ Our cups don't need the SUPD logo as informed before. Our cups don't fall in the SUPD regulations, not in Germany and not in EU. We have cups scheduled to arrive until the middle of 2022 already so, we are sure of it. It could be also categorized as home composting as well, but we are just able to confirm it if we are able to issue the respective certificate, which is not possible at the moment.</p> <p>The water-based dispersion barrier in our coffee cups consists of a mixture of 60-70% water and 30-40% ethylene acrylic acid = ethylene acrylic acid dispersion.</p> <p>About certificates to supply, we are not able to do it. We don't supply any certificate, except for the declaration of conformity”</p>	<i>See reply below</i>

		<p>If you agree we will ask for more information on the composition and the declaration of conformity. Once the home composting certificate is available we will send a well but at the moment I think there is no standard test</p>	
11/02/2022		<p>So we have received further information and the certification from the manufacturer regarding the water based lining of our paper cups</p> <p>Kindly review and let us know your position in this respect . As can be noted these have been accepted to be used in the EU including Germany</p> <p>-----</p> <p><b>Relevance of European SUP Directive Art. 7 for Greenbox paper cups</b></p> <p>Dear Customer, Following, we would like to substantiate our position on whether article 7 on Marking requirements of Directive (EU) 2019/904 of the European Parliament and of the Council of 5th June 2019 on the reduction of the impact of certain plastic products on the environment (short "SUPD") must be applied to the paper cups sold by Greenbox GmbH &amp; Co. KG. Beside the already named directive, the argumentation is based on the accompanying Commission guidelines 202/C 2016/01. The definitions of plastic (SUPD Article 3) and plastic product (202/C 2016/01 2.2.) are the decisive points when evaluating the cups being covered by the SUPD or not.</p> <p>According to SUPD 3 (1) plastic is defined by following:</p>	<p>On the basis of the latest documentation submitted to ERA, we can confirm that those paper cups do not fall under the scope of the SUP Directive and related draft national legislation.</p> <p>This is essentially due to the fact that the dispersion barrier referred to in the said documentation does not constitute a distinct layer in those cups, but rather it is part of the matrix itself. Hence, it is not capable of functioning as a main structural component of final products as stipulated in the definition of plastic laid down in the SUP Directive and draft SUP Framework Regulations.</p> <p>Furthermore, Commission guidelines on single-use plastic products in accordance with Directive (EU) 2019/904 (<a href="#">link</a>) state that <i>"The use of such polymeric materials, e.g. as retention agents or binders and processing aids in the production of a material, which in itself is not plastic, does not result in the single-use product made only of that material to be considered as being made partly of plastic [...]"</i></p> <p><i>Consequently, paper- and board-based single-use products made only from paper- and board-based material and without a plastic lining or coating are not, in light of the considerations above, to be considered as single-use plastic products in the meaning of the Directive."</i></p>

		<p>“plastic’ means a material consisting of a polymer [...] which can function as a main structural component of final products”</p> <p>As the water-based dispersion barrier used in the cardboard of paper cups having pigments and latex binders as constituents cannot be formed into an item without a substrate, such as paper fibers, it is not able to function as a main structural component and with that not defined as plastics.</p> <p>Additionally, the definition of plastic product is more specifically outlined in 202/C 2016/01 2.2.1. <i>Plastic content: wholly or partly made from plastic</i> where it says.</p> <p>“In the production of many materials, including non-plastic materials, polymers that meet the definition of plastic in this Directive are often used to achieve specific material properties as well as higher production process efficiencies. Those polymeric materials are often synthetic chemical additives. The use of such polymeric materials, e.g. as retention agents or binders and processing aids in the production of a material, which in itself is not plastic, does not result in the single-use product made only of that material to be considered as being made partly of plastic.”</p> <p>Therefore, polymers used as additives and binders within the cardboard do not result in the cardboard product being evaluated as a plastic product. The dispersion barrier is added into the pulp and serves its purpose</p>	
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		<p>within the paper sheets, or more precisely around the single fibers, and not on the sheet as a coating or lining.</p> <p>Following this argumentation and interpretation, we as Greenbox do not apply certain marks onto the paper cups. Since 2nd of July 2021 we are selling coffee cups with a water-based dispersion barrier freely in Germany and throughout Europe.</p> <p>However, as the SUPD needs to be put in local legislation, the final evaluation whether water-based dispersion barriers are affected by the SUPD is the responsibility of the local authorities.</p>	
7	Mario Attard 17/01/2022	<p>Qed nibatlek din l email, minhabba IL legislazzjoni tas single use plastic.</p> <p>Jien owner ta kiosk li nahdem principarjssment FL events u festi Tal irhula.. konna infurmati li minn frat 2022 ma nistax nuzaw aktar plastic , ma stokjajniex iktar, Halli nilhqu nuzaw l iskock li kellna izda minhabba IL Covid, events u festi kien kwazi inezistenti, u minhabba hekk fadlina xi ftit stock. Meta cempilt lill Era , l unika twegiba li inghatajt hi li niddisponi minnu fil mizbla Tal maghtab....jigifiera ha narmuh fl landfill xorta wahda.</p> <p>Tistghu jekk joghgbok tikkunsidraw li taghtu extension ta ftit zmien iehor, imqar sas sajf li gej, forsi jibdew isiru xi ftit events Jew festi u ma nahlux l iskock li ghandna..</p>	<p>Il-liġi li tipprojbixxi l-bejgħ ta' ċerti oġġetti tal-plastik giet ippubblikata fl-24 ta' Diċembru 2021 permezz ta' Avviż Legali 499 tal-2021. Minkejja l-fatt li l-A.L. 499 tal-2021 mhuwiex parti minn din il-konsultazzjoni pubblika, skont dan l-Avviż Legali, din il-projbizzjoni daħlet fis-seħħ xahrejn wara l-pubblikazzjoni tagħha, jigifieri fl-24 ta' Frar 2022. Wara din id-data , l-ebda hażna ta' ċerti oġġetti mnizzlin fl-Iskeda mhu se jithalla jintuża, anki jekk jingħata b'xejn, bħala parti minn attività kummerċjali.</p> <p>Il-ħażna li jifdal trid tiġi disponuta skont id-dispożizzjonijiet tal-liġi u s-sistemi eżistenti għall-ġbir tal-iskart, jew tista' tiġi mogħtija bħala donazzjoni mingħajr ħlas lil xi organizzazzjoni tal-karità, tintbagħat lura jew tinbiegħ lill pajjiżi li mhumiex fl-UE.</p>
8	Steve Rizzo 17/01/2022	<p>Further to this morning discussions I'd like to refer to the following and I'd like to raise a few points. Re: Single-Use Plastic Framework Regulations</p> <p><b>Point 1</b></p>	

	<p>Regulation 6 transposes the new marking requirements emanating from the SUP Directive, whereby certain SUP products<sup>2</sup> are to bear conspicuous markings to inform consumers of the appropriate waste management options or waste disposal means to be avoided for that product, the presence of plastics in the product and the resulting negative environmental impact of littering or other inappropriate means of disposal. Such markings shall be in line with the harmonised standard set out in the relevant Commission Implementing Regulation and shall be both in Maltese and English. Products that do not comply with these requirements are prohibited from being placed on the national market in accordance with the Restrictions on Placing on the Market of Single-Use Plastic Products (Amendment No 2) Regulations.</p> <p>We are facing issues as a very small nation that most suppliers are not able to also add the maltese language to the <b>embossing</b> of plastic or pla cups because the moulds have already been done at very great expenses with english and the other major european state languages included but not with malta as we are too small to contemplate – these also sometimes also refers to the printing of certain cups too that come from say the united states. This nonsense and useless. English is widely spoken.</p> <p>Most products such as food allow italian to be used on the side of the product where not even maltese or english are not even written which otherwise would ential most products wouldnt be allowed in and we are too small a market to be able to dictate globally. So you</p>	<p>The requirements for the marking have been harmonised at EU level through the Commission Implementing Regulation (EU) 2020/2151. According to article 3 of this Regulation: <i>“The information text of the marking shall be written in the official language or languages of the Member State(s) where the single-use plastic product is placed on the market.”</i> The text of this EU Regulation is directly applicable in Malta.</p>
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	<p>allow italian even though most people dont know and speak italian. So why change this ?</p> <p>The product safety act and its subsidiary legislation the food safety act allow english or italian alone and no maltese so why not to packaging? Your remit on what is required is not maltese and english but maltese or english at least. Eu regulation L428/57 article 3 clearly states offical language or langues – meaning or so either of which can be used but it does not stipulate both.</p> <p>I am requesting whether you will assist by stipultin that either both or eitehr or is allowed given any issues that maltas glbal dication is not enough at times to change such embossing or print dues to the nature given of manufacturunf and quantiy issues.</p> <p><b>Point 2</b></p> <p>Is PLA thought of as oxo-degradable material? Menaing are pla cups are allowe dto be imported. Are PLA cutleries allowed on the market ? in view many foreign supermarkets are importing them without being stopped ?</p> <p><b>Point 3</b></p> <p>Small Single use PS containers made out of clear or black PS for wedding banquets and used for breakfast buffets – are these allowed and must them have eu harmonsied marking stoo on them ?</p>	<p><b>Point 2</b></p> <p>PLA itself is a plastic polymer and, therefore is not considered to be an oxo-degradable material unless oxo-degradable additives have been added during the making of the final plastic polymer. Hence, SUP cups for beverages made of PLA that do not contain any oxo-degradable additive are not banned. In line with S.L. 549.140, the only SUP cups that are banned are those made of expanded polystyrene (jablo). On the other hand, all SUP cutlery are banned, irrespective of the polymer/s constituting such SUP products, as per S.L. 549.140.</p>
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			<p><b>Point 3</b>          Kindly note that only SUP food containers made out of Expanded Polystyrene (EPS – also known as Jablo in Malta) that fulfil the three criteria laid down in Part A of the Schedule to S.L. 549.140 are banned. Hence, SUP food containers made of Polystyrene (PS) are not banned, nor are they subject to marking requirements, however may be subject to the requirements under regulation 4(8) of the SUP Framework Regulations.</p>
		<p>Further to my enquiry this morning..see attached example of a champagne cup with limited space possibilities to add maltese in view italian is also allowed on food products then I don't see why too that Italian is allowed.. to assist we need flexibility in this matter !</p> 	
18/01/2022		<p>Furtehr to my previous email – European law in maltese clearly states plastic in product only in english and not in maltese language.</p>	<p>The Maltese version of Commission Implementing Regulation 2020/2151 laying down rules on harmonised marking specifications was subject to a corrigendum to rectify this error in March 2021. Kindly find link of corrected Maltese version of the said Implementing Regulation (<a href="#">link</a>).</p>

		<a href="https://eur-lex.europa.eu/legal-content/MT/TXT/PDF/?uri=CELEX:32020R2151&amp;from=EN">https://eur-lex.europa.eu/legal-content/MT/TXT/PDF/?uri=CELEX:32020R2151&amp;from=EN</a> kindly clarify please.	
9	Izzy Cadec 28/01/2022	<p>I am emailing in regard to the public consultation: Transposition of the remaining Articles of the Single Use Plastics Directive. I do hope you will read and consider my comments.</p> <p>While it is excellent that plastic bags have been removed from stores in Malta, there remains the significant issue of plastic bottle usage. Pushing for bottles to 'contain at least 25% of recycled plastic' by 2025 and for this to be increased to 30% by 2030 is an initiative that is too little too late to have a significant impact in Malta. Our climate and biodiversity crisis is an issue of today. <b>Not to mention, you are failing to tackle the root cause of the plastic bottle issue, undrinkable tap water.</b></p> <p>I am proposing a new alternative to plastic consumption in Malta that can start tackling this plastic crisis today. Malta is a relatively small island, hence the implementation of this can be on a wide scale to have a significant impact on plastic bottle consumption. Best of all, this sustainable alternative financially supports local businesses in the process while simultaneously taking active steps to reduce plastic consumption. You will be supporting both sustainability and local businesses in the process.</p> <p>Please read the attachment '<b>Improved solution to</b></p>	Your feedback is duly noted.

		<p><b>single-use plastic bottles'</b> for my comments and proposal.</p> <p><i>(Information on K8 machine were included with the submission)</i></p>	
10	<p>Luca Amato</p> <p>01/02/2022</p>	<p>I am writing with a couple queries in relation to the upcoming new legislation relating to single-use plastics.</p> <p>Firstly, I wanted to understand how <b>ice cream cups</b> would be treated, i.e. whether they would be treated as “food containers” as defined in Part A of Schedule 1 of the Single-Use Plastic Framework Regulations or whether they would be treated as “cups for beverages”. This distinction is important since the two items carry different obligations. I note that the Commission has addressed this issue (see attached) by stating the following:</p> <p><i>“As the products that you are referring to are not directly addressed in the SUPD and also not directly addressed in the Guidelines, in the end it is for the Member State to determine if it considers these products to be Food containers...”</i> (Question 27, page 12).</p> <p>Secondly, and similarly, it would be helpful to understand if <b>soup cups</b> will be treated as food containers or cups for beverages.</p>	<p>Cups used for ice-cream are not cups for beverages within the meaning of the draft SUP Framework Regulations. The reason being that a beverage is essentially a liquid that is ingested/consumed through drinking as also explained in Commission guidelines on single-use plastic products in accordance with Directive (EU) 2019/904 (<a href="#">link</a>). Consequently, ice-cream is considered as food as long as it is not consumed by drinking. In light of the above, cups for ice-cream should be considered as SUP food containers if the related criteria established in the SUP Framework Regulations are all fulfilled.</p> <p>Same rationale applies. As stated in the said Commission Guidelines, <i>“certain foods, such as soups, yoghurts (unless they are drinkable) and fruit purees should not be classified as beverages for the purposes of the Directive, as they are typically not consumed through drinking and cutlery is typically used for their consumption, which distinguishes them from beverage products.”</i> Hence, soup cups should be considered as SUP food containers if the related criteria established in the SUP Framework Regulations are all fulfilled.</p>
11	<p>Abigail Mamo</p> <p>Malta Chamber of SMEs</p>	<p>Members within the Malta Chamber of SMEs importing sanitary wear particularly sanitary pads, have raised a concern over the new legislation coming into place re; single use plastics. This is probably a concern shared also by other sectors. In particular regarding two points.</p>	<p>The requirements for the marking have been harmonised at EU level through the Commission Implementing Regulation (EU) 2020/2151. According to article 3 of this Regulation: <i>“The information text of the marking shall be written in the official language or languages of the</i></p>

	28/01/2022	<p>As you know the current directive requires for Sanitary towels, tampons and applicators (amongst others) need to be labelled in both Maltese and English with clearly legible and indelible marking on its packaging or on the product informing on:</p> <ul style="list-style-type: none"> <li>• Appropriate waste management options, or waste disposal to be avoided; and</li> <li>• The presence of plastics and resulting negative impact of littering on the environment</li> </ul> <p>Importers are allowed to print and stick stickers as an interim solution till July 4<sup>th</sup> of this year, and notice will have to be printed directly on the package thereon.</p> <p>This is however presenting a number of disproportionate difficulties for members in this sector. Just to put you into perspective, in order to cater for a number of international issues, mainly issues with supply chain and the current pandemic, importers opted to import products in larger quantities to tackle these issues. Additionally, across the board, members have experienced a slower economic momentum.</p> <p>As a result, members are currently overstocked with certain products (especially products coming from third countries) and from the feedback gathered, it is impossible for them to make use of the current stocks by the 4<sup>th</sup> of July.</p>	<p><i>Member State(s) where the single-use plastic product is placed on the market.”</i></p> <p>Notably the Regulation provides for a transitory approach as:</p> <ul style="list-style-type: none"> <li>- For those items that were placed on the market (imported) before 3 July 2021, no such marking is required;</li> <li>- For those items that were placed on market before 4 July 2022, the marking may be done by means of a sticker;</li> <li>- In the above cases, such items can remain in circulation on the market.</li> <li>- Items placed on market after 4<sup>th</sup> July 2022 will require the marking printed/embossed on the item/package itself as required by the Regulation.</li> </ul> <p>The text of this EU Regulation is directly applicable in Malta.</p>
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		<p>In order to maintain the spirit of the directive, that of reducing single use and thus reducing waste, we would like to make a request, for an exemption and for ERA to allow products with sticker markings (instead printed directly on the packaging) to be sold beyond the 4<sup>th</sup> of July and at least till end of November 2022.</p>	
	<p>2/2/2022</p>	<p>Further to the consultation meeting held by ERA and following a number of discussions with our members, we have received feedback on the interpretation of a particular clause coming out the commission's implementing regulation.</p> <p>Specifically, the commission's Implementing Regulation (EU) 2020/2151 regulation which outlines the harmonised template of markings required in terms of the SUP Directive (Directive (EU) 2019/904), which will eventually be transposed into Maltese law, following this consultation stage.</p> <p>Article 3 of Commission Implementing Regulation (EU) 2020/2151 states that <b><i>“The information text of the marking shall be written in the official language or languages of the Member State(s) where the single-use plastic product is placed on the market”</i></b>.</p> <p>As mentioned during both consultation sessions held and as highlighted in the presentation - <a href="https://era.org.mt/wp-content/uploads/2022/01/Presentation_SUPs.pdf">https://era.org.mt/wp-content/uploads/2022/01/Presentation_SUPs.pdf</a> , Article 3 is being interpreted that the required markings are to be in both <u>English AND Maltese</u>, and not only in English ( representing at least one of the official</p>	

	<p>languages of Malta). Such markings are being required on all products (allowed use of stickers till July 4<sup>th</sup> and printed on the products thereon.</p> <p>In our opinion, we believe that such an interpretation of the law and the position being taken by ERA , runs contrary to the spirit of the law and the objectives of the SUP Directive. Keeping this in mind, we note that English is not only an official language in line with the Constitution of Malta, but is also understood by the majority of Maltese nationals, <u>and</u> foreign nationals living in Malta. English is therefore the language understood by the <u>majority</u> of consumers present in the country.</p> <p>We also note that the English wording “plastic in product” or “made of plastic” is extremely similar and easily understood by Maltese speakers given the Maltese terms “plastik fil-prodott”, and “magħmul minn plastik”. Moreover, we also note that other laws regulating product information such product safety info, food markings, and other consumer information are all required in one official language <u>only</u>, in line with applicable Maltese law.</p> <p>As an example, EU Regulation 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers) imposes less stringent language requirements in Article 15 which holds that:</p> <p style="text-align: center;"><i>1. Without prejudice to Article 9(3), mandatory food information shall appear in <u>a language</u></i></p>	
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***easily understood** by the consumers of the Member States where a food is marketed.*

*2. Within their own territory, the Member States in which a food is marketed may stipulate that the particulars shall be given in **one or more languages from among the official languages of the Union.***

*3. Paragraphs 1 and 2 shall not preclude the particulars from being indicated in several languages.”*

The above regulation was locally implemented through the *Labelling, Presentation and Advertising of Foodstuffs Regulations* (S.L. 449.46, also attached) which contained laxer requirements and indeed states that “*the particulars given according to the provisions of these regulations shall appear in **at least one** of the following languages: Maltese, English, Italian”.*

For the above reasons, and given the additional pictorials accompanying the text, which are harmonised across the EU, we believe that the imposition of Maltese markings and stickers on the same products (in addition to the English markings and pictorials) will constitute a significant additional financial and administrative burden, which burden is disproportionate and results in gold-plating of the regulation. It will also go directly against the very spirit of the SUP Directive (being the protection of the environment and the decrease in plastics and waste due to the wastage of resources). Moreover, and in the context of the inflation crisis hitting

		<p>the country and the global economy, imposing further regulatory restrictions and requiring tailor-made Maltese markings on consumer products will only lead to higher costs for wholesalers, importers and retailers, ultimately leading to higher costs for consumers.</p> <p><u>In this regard, we kindly request that the above is addressed when transposing this legislation into Maltese Laws.</u></p> <p>The Malta Chamber of SMEs remains available to meet and discuss this matter further.</p>	
12	<p>Joe Attard GreenMt 05/02/2022</p>	<p>We refer to your presentation in respect to Transposition of the remaining articles of the Single-Use Plastics Directive (SUPD)</p> <p>We specifically refer to regulation 7-8 and then also to Public Awareness Campaigns</p> <p>The items ‘sanitary towels, tampons and applicators’ do not feature in respect to regulation 7 – 8, whilst they feature in the awareness. Can you advise whether there is any kind of omission in regulation 7-8 ?</p> <p>Awaiting feedback prior to providing full feedback regarding this consultation</p>	<p>In line with the EU SUP Directive, “<i>Sanitary towels (pads), tampons and tampon applicators</i>” are not subject to article 8 of the said Directive on Extended Producer Responsibility (EPR). Hence, this category of products does not feature in regulations 7 and 8 of the draft SUP Framework Regulations.</p> <p>On the other hand, such products are subject to awareness raising as per article 10 as well as to the new marking requirements laid down in Article 7 of the abovementioned EU Directive.</p> <p>In light of the above, we can confirm that there is no omission in regulations 7 and 8 of the draft SUP Framework Regulations.</p>
13	<p>Timothy Alden Malta Chamber of Commerce 9/2/2022</p>	<p><b>Introduction</b></p> <p>The Malta Chamber of Commerce, Enterprise and Industry advocates both sustainability and competitiveness – as industry cannot go green if it is not competitive. Achieving circularity also entails research, design and innovation leading to recycling, reuse and</p>	<p>As regards the proposed regulation 4: Neither the SUP Directive nor the draft SUP Framework Regulations exempt Single-Use Plastic products made from biodegradable and compostable plastic according to harmonised standard EN 13432:2000. The reason being that such plastics are only biodegradable and compostable at industrial establishments and not at ambient conditions.</p>

	<p>reducing, and the transposition of the Single Use Plastics Directive should serve as an opportunity to motivate businesses in that direction.</p> <p>Furthermore, the principles of a just transition must be respected, ensuring that jobs are not endangered by a green transition. The Single Use Plastics Directive has an unduly large impact upon Malta as a microstate and a small market.</p> <p>Therefore, The Malta Chamber expects government to guarantee a business-friendly transposition of the Single Use Plastics Directive which both empowers businesses to innovate and which respects Malta’s geographic and economic particularities.</p> <p><b>The Concerns on the Proposed Transposition</b></p> <p>In preparing for this consultation, The Malta Chamber consulted with its members, seeking a broad range of input.</p> <p>The results therefore reflect feedback from the Circular Economy Thematic Committee, manufacturers, importers of affected products, and other ancillary services.</p> <p>Furthermore, The Malta Chamber conducted legislative research and corresponded with other affected partners, such as the Luxembourg Chamber of Commerce, to compare and contrast implementation.</p> <p>The below tables reflect The Malta Chamber’s smart and sustainable island, whereby a greener economy enhances competitiveness. Therefore, the feedback being presented to ERA is focused on results – avoiding unnecessary financial burdens on businesses, while seeking to obtain the desired environmental outcomes in the most effective and efficient manner.</p>	<p>However, single-use <b>non-plastic</b> alternatives are excluded from the scope of the SUP Directive and the proposed national Regulations and therefore can be freely distributed by catering establishments for take-away consumption of food and beverages without being subject to the fee and are also not prohibited from being provided for eating-in.</p> <p>The latter is in itself a form of indirect incentive, as in line with article 4(1) of the SUP Directive, the said measures are intended to discourage consumption of SUP cups and food containers and instead resort to reusable alternatives and single-use non-plastic alternatives. Although the use of single-use non-plastic items is not prohibited and is a practical option in certain cases, the emphasis within the proposed legislation remains on the use of reusable alternatives, where feasible, in line with the waste hierarchy (waste prevention to be prioritised over all other actions). Indeed the intention is not to shift consumption patterns to other forms of single-use items as these will also have environmental impacts.</p> <p>Notably, the legislation has also provided a required degree of flexibility. The proposal states that:</p> <p><i><u>“Without prejudice to existing national, European and International legislation, as from 1 January 2023 catering establishments shall provide an adequate number of reusable alternatives to the single-use plastic products listed in Part A of Schedule 1 at the point of sale as long as practically feasible...”</u></i></p> <p>To clarify, the above-mentioned provision does not imply that e.g. a take-away restaurant should only use reusable alternatives, but rather that an adequate number of such alternatives (the number might vary depending on the establishment itself, operational models etc.) should be made available to its consumers, for them to actually re-use such containers/cups multiple times. Notably, the use of SUP containers for take-away and for home-delivery is not being banned by the proposed draft, however such containers will be subject to a fee.</p>
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	<p>The key concerns identified are as follows:</p> <ul style="list-style-type: none"> <li>• The requirement for markings on products to be in both English and Maltese will result in businesses in Europe no longer exporting to Malta or doing so at increased costs. The Malta Chamber expects ERA to take the position of Luxembourg, as in Luxembourg, the markings only need to be in one of the country's three official languages, which includes Luxembourgish.</li> <li>• Businesses may not adopt non-SUP alternatives such as cardboard if they are more expensive than SUP items. Therefore, support schemes &amp; mechanisms must be identified to ensure that businesses are encouraged to change their behaviour without incurring additional costs.</li> <li>• New auditing requirements must be smartly designed in consultation with industry.</li> <li>• For reuse, recycling and recovery activities, there should be a framework for businesses to benefit to the extent those activities are carried out.</li> </ul>	<p>As regards the proposal to subsidise single-use non-plastic products, as explained above, the consumption reduction measures are intended to prioritise re-use and waste prevention over any other option. In this context, a subsidy may result in shifting consumption patterns towards other single-use products, which thus defeats one of the key objectives of the Union and national waste management policy, i.e. to reduce waste generation.</p>						
	<p><b>Single-Use Plastic Framework Regulations, 2021</b></p> <table border="1"> <thead> <tr> <th data-bbox="504 925 728 989">Applicable Regulations</th> <th data-bbox="728 925 952 989">Issue</th> <th data-bbox="952 925 1176 989">Action</th> </tr> </thead> <tbody> <tr> <td data-bbox="504 989 728 1390"><b>Regulation 4</b></td> <td data-bbox="728 989 952 1390">Article 4. (2) The Minister in consultation with the Competent Authority and the Agency may include national consumption reduction targets,</td> <td data-bbox="952 989 1176 1390">Non-SUP alternatives should be added to this criterion to accompany re-usable alternatives. The assumption here is that even bio-</td> </tr> </tbody> </table>	Applicable Regulations	Issue	Action	<b>Regulation 4</b>	Article 4. (2) The Minister in consultation with the Competent Authority and the Agency may include national consumption reduction targets,	Non-SUP alternatives should be added to this criterion to accompany re-usable alternatives. The assumption here is that even bio-	
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<b>Regulation 4</b>	Article 4. (2) The Minister in consultation with the Competent Authority and the Agency may include national consumption reduction targets,	Non-SUP alternatives should be added to this criterion to accompany re-usable alternatives. The assumption here is that even bio-						

			<p>measures ensuring that re-usable alternatives to the single-use plastic products listed in Part A of Schedule 1 are made available at the point of sale to the final consumer, economic instruments such as instruments ensuring that those single-use plastic products are not provided free of charge at the point of sale to the final consumer.</p>	<p>degradable SUP is included in this legislation as per Recital 11, and therefore, any form of SUP, whether biodegradable or otherwise, is discouraged. However non-SUP material, such as paper/cardboard, may be an eco-friendlier option that would allow for single use. It may simply not be feasible for the client to buy re-usable packaging every time. For example, if customers order food for home delivery, it would simply not be feasible to buy re-usable</p>	
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				containers every time.	
			Article 5. Without prejudice to the generality of sub-regulations (1) and (2) of this regulation, single-use plastic products listed in Part A of Schedule 1 that are provided empty or filled at the point of sale shall not be provided free of charge to final consumers by catering establishments.	Government should incentivise businesses to source non-SUP alternatives instead of offering only reusable items or costlier SUP items. This could take the form of a subsidy on non-SUP materials.	
		<b>Applicable Regulations</b>	<b>Issue</b>	<b>Action</b>	Comment duly noted. Whilst ERA and Circular Economy Malta have, and continue to, engage in consultations with relevant stakeholders, one may note that the auditing requirement laid down in regulation 5(4) of the draft SUP Framework Regulations is mirroring similar auditing requirements in other waste legislation, e.g. on producers of products subject to the Extended Producer Responsibility principle in S.L. 549.43 and S.L. 549.89, and serves the only purpose of ensuring that the information reported to the Authority is vetted by an independent auditor approved by ERA.
		<b>Regulation 6</b>	Regulation 5 establishes a new product requirement on beverage bottles with a capacity up to three	Engage with The Malta Chamber and other industry players to ensure that there is a proper system of checks and	

			<p>litres, whereby:</p> <ul style="list-style-type: none"> <li>• As from 1 January 2025, PET bottles shall contain at least 25% of recycled plastic, calculated as an average of all such bottles placed on the national market; and</li> <li>• As from 1 January 2030, the plastic recycled content shall increase to 30%, calculated as an average of all such bottles placed on the market of Malta.</li> </ul> <p>Producers may opt to achieve the above-mentioned targets either individually or</p>	<p>balances guaranteeing that audits are being done properly.</p>	
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			collectively. In order to ascertain whether such targets have been attained, producers are obliged to submit to ERA information audited by an independent auditor on the recycled content in the beverage bottles placed on the market.		
		<b>Applicable Regulation</b>	<b>Issue</b>	<b>Action</b>	<p>The requirements for the marking have been harmonised at EU level through the Commission Implementing Regulation (EU) 2020/2151. According to article 3 of this Regulation: <i>“The information text of the marking shall be written in the official language or languages of the Member State(s) where the single-use plastic product is placed on the market.”</i></p> <p>Notably the Regulation provides for a transitory approach as:</p> <ul style="list-style-type: none"> <li>- For those items that were placed on the market (imported) before 3 July 2021, no such marking is required;</li> <li>- For those items that were placed on market before 4 July 2022, the marking may be done by means of a sticker;</li> </ul>
		<b>Regulation 7</b>	Due to Malta’s small market size and therefore import volumes, importers are concerned that if printed markings in both Maltese & English on certain products will mean that foreign manufacturers will no longer produce certain	The requirement for the markings to be in all official languages of the country is the problem – either one of the official languages is acceptable (English), or the	

			<p>products for Malta. The implementation of the Directive as is will lead to both increased prices at a time when prices are already increasing for other reasons. It may also eliminate or restrict competition and consumer choice.</p> <p><b>Case Study: Sanitary Pads</b> There are different kinds of printers during the manufacturing process, and this means that the printing cannot be carried out by local companies in Malta after the product has been imported, so as to add the Maltese language. During the manufacturing process, the</p>	<p>labelling is to be permitted indefinitely, past the June deadline. Alternatively, only the wording at the bottom of the packaging as prescribed by the regulations is necessary in all languages, and may be added in Maltese under the English labelling by local businesses. The Malta Chamber notes that Luxembourg is requesting that markings in their country need to be carried out in only one of the three official languages of Luxembourg,</p>	<ul style="list-style-type: none"> <li>- In the above 2 cases such items can remain in circulation on the market.</li> <li>- Items placed on market after 4<sup>th</sup> July 2022 will require the marking printed/embossed on the item/packaging itself as required by the Regulation.</li> </ul> <p>The text of this EU Regulation is directly applicable in Malta.</p>
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			<p>printing is first carried out on the packs of the products with a specific type of printing machine. The product itself is afterwards inserted into the pack.</p> <p>The printers which can be used to print on finished packs are a different type of printer. These are unable to print properly on a surface which is not firm and 'stiff' (thereby presenting a printable surface).</p> <p>Laser printer heads cannot be used on plastic as they will burn the plastic. This leaves only ink jet printers, which are even more limited. There may not be space on the pack for a complete 'box', as</p>	<p>which includes Luxembourgish. This was confirmed in a meeting with the Luxembourg Chamber of Commerce. Luxembourg SUP law: <a href="https://www.cc.lu/fileadmin/user_upload/tx_cnews/20210317-AEV-SUP_Marquage.pdf">https://www.cc.lu/fileadmin/user_upload/tx_cnews/20210317-AEV-SUP_Marquage.pdf</a></p> <p>Relevant text extracted below:</p> <p><i>“Exigences linguistiques au Luxembourg L'article 3 du règlement d'exécution 2020/2151 spécifie que « la mention figurant sur le marquage est écrite dans la (ou les)</i></p>	
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			<p>per the regulations, to be inserted anyway.</p>	<p><i>langue(s) officielle(s) de l'État membre dans lequel le produit en plastique à usage unique est mis sur le marché. » Pour pouvoir être conformes à ce règlement, les produits concernés qui seront mis sur le marché luxembourgeois dès le 3 juillet 2021 devront posséder un marquage dans au moins une des trois langues officielles du Luxembourg : le français, l'allemand ou le luxembourgeois . Pendant une période transitoire allant du 3</i></p>	
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				<p><i>juillet 2021 au 4 juillet 2022, le marquage peut être apposé sur l'emballage en question sous forme d'autocollants."</i></p> <p>The Malta Chamber recommends taking inspiration from the EU Regulation 1169/2011 which poses laxer language requirements as follows, and that Malta's special position is argued for interpretation as needed:</p> <p><i>"Article 15</i></p> <p><i>1. Without prejudice to Article 9(3), mandatory food information shall appear in <b>a language easily understood</b> by</i></p>	
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				<p><i>the consumers of the Member States where a food is marketed.</i></p> <p><i>2. Within their own territory, the Member States in which a food is marketed may stipulate that the particulars shall be given in <b>one or more languages from among the official languages of the Union.</b></i></p> <p><i>3. Paragraphs 1 and 2 shall not preclude the particulars from being indicated in several languages.”</i></p> <p>The above was locally implemented (though it is directly applicable in and by itself because it is an EU Regulation) via the LABELLING, PRESENTATION AND</p>	
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				<p>ADVERTISING OF FOODSTUFFS REGULATIONS (S.L. 449.46, also attached) which contains even laxer requirements and indeed states that <i>“the particulars given according to the provisions of these regulations shall appear in <b>at least one</b> of the following languages: Maltese, English, Italian”</i>.</p>	
		<p><b>Applicable Regulations</b></p> <p><b>Regulation 8</b></p>	<p><b>Issue</b></p> <p>Operators should be incentivised to engage in their own material recovery operations as a potential alternative to forming part of a collective scheme. This would have the</p>	<p><b>Action</b></p> <p>If an operator is ready to design and manufacture products which are recyclable and independently implement recover, recycle and reuse initiatives, a Polluter Pays</p>	<p>Please note the following in response to your comments:</p> <ul style="list-style-type: none"> <li>- The SUP products referred to in regulation 8 of the draft SUP Framework Regulations are mostly packaging, notably primary packaging, which are already subject to the EPR scheme established under the Packaging and Packaging Waste Regulations, S.L. 549.43;</li> <li>- Producers of primary packaging are already obliged to be a member of a permitted Packaging Waste Recovery Organisation to fulfil their EPR obligations emanating from the Regulations in question (including, but not limited to, packaging waste collection and treatment, attainment of the targets established therein etc.);</li> </ul>

			<p>added benefit of fostering innovation.</p>	<p>principle may apply, and the company will only pay for the waste which is not collected. This would enable them to operate outside of a collective scheme.</p>	<ul style="list-style-type: none"> <li>- S.L. 549.43 <i>inter alia</i> obliges the permitted Packaging Waste Recovery Organisations to finance any systems set up for the collection and treatment of municipal packaging waste (thus including the majority of the targeted SUP products) and to make arrangements with the Local Councils for its collection;</li> <li>- Such Producer Responsibility Organisations already have the necessary organisational and financial means to ensure the environmentally-sound management of such waste in a cost-effective manner;</li> <li>- In line with the Extended Producer Responsibility Framework Regulations, S.L. 549.141, the fees charged to producers by Producer Responsibility Organisations shall be modulated, where possible, for individual products or groups of similar products, notably by taking into account their environmental performances (e.g. durability, repairability, re-usability and recyclability); and</li> <li>- Under EPR legislation, the concept of producer does not solely relate to importers, but also to local manufacturers of the targeted products who places such products on the national market.</li> </ul> <p>In view of the above and taking into consideration that regulation 8 of the draft SUP Framework Regulations aims at implementing the additional EPR costs (rather than delving into waste treatment issues), we believe that the proposed system will ensure proper implementation of these new obligations in a cost-effective manner, notably by promoting the establishments of economies of scale and therefore minimising the burden on economic operators, most notably small economic operators.</p>
			<p>Local legislation is focused on importers and leaves little room for manufacturers to produce circular solutions.</p>	<p>There should be some sort of incentive for recovering, recycling and reusing the products that an operator puts on the market. One option could be to link circular economy to the official carbon credits system or a derivative thereof. Such “environmental” credits could also be awarded for attainment</p>	

				<p>and continuation of environmental standards (ISO14001), for having an Environmental Permit from ERA, etc. Credits could also ultimately be awarded for companies performing recycling activities.</p>	
<p><b>Conclusion</b></p> <p>The Malta Chamber seeks flexibility on the path to sustainability to ensure that businesses do not lose competitiveness. However, this flexibility does not come at the cost of sustainability or the environment, but rather reflects that Malta is not always suitable for one-size-fits-all solutions, and that the spirit of regulation should not fall victim to strict bureaucratic interpretation.</p> <p>Understanding that ERA must ensure Malta is in line with the Single Use Plastics Directive, The Malta Chamber engaged with its counterpart, the Luxembourg Chamber of Commerce, to assess the potentially similar experiences of another small country within the European Union. It found reason to pursue the aforementioned approach in Malta.</p>					

		<p>Through its membership of Eurochambres, Business Europe and other organisations, The Malta Chamber is ready to collaborate and assist in efforts to ensure favorable and sustainable regulations for operators in Malta. The Malta Chamber looks forward to further discussion and dialogue with ERA to find the best fitting solutions in the interests of local industry.</p>	
14	<p>Timothy Alden</p> <p>Malta Chamber of Commerce obo an <b>Anonymous Importer</b></p> <p>09/02/2022</p>	<p>The Malta Chamber was collecting feedback from its members on the transposition of the SUP Directive. One member responded to us too late for us to analyse their feedback and integrate it into our submission. We are sharing it with you as it was received for your review, and on their behalf at their request. They wished to remain anonymous.</p> <p><b>Feedback from Anonymous Importer Single Use Plastics Directive</b></p> <p>Extended producer responsibility is an especially complex issue. This is the reason that justifies why: (i) the European Commission contemplates a deadline until 5th January 2023 (as per Article 17) and (ii) the European Commission shall publish guidelines for criteria, in consultation with Member States, related to costs of the cleaning of waste (expected by the end of this year).</p> <p>Driven by the complexity of the subject matter and the pre-work needed, the design of the instruments that will make extended producer responsibility effective should fulfill two key principles: <b>effectiveness and proportionality.</b></p>	<p>The detailed feedback provided will be taken into due consideration while determining the methodology for the allocation of the additional EPR costs emanating from the SUP Directive. As pointed out, the European Commission is to publish guidelines establishing common criteria for MS to determine their own methodology, which guidelines have not yet been published. In this context, please note that regulations 7 and 8 of the SUP Framework Regulations stipulate that <i>“the costs of cleaning up litter shall be limited to activities undertaken by public authorities or on their behalf. Such activities shall be subject to prior approval of the Authority”</i>. This means that not any such activity will need to be financed by producers, but only those which are approved by ERA notably on the grounds of appropriateness and cost-effectiveness.</p>

		<p>Further, the application of EPR schemes to tobacco product filters is a novel concept and one which requires careful consideration to ensure effectiveness and proportionality, as is referred to above.</p> <p>Following that, it is necessary for Guidelines to indicate what processes are to be recommended to ensure transparency in the way costs are determined between the actors: this includes not only ‘producers’ and public authorities but considering how costs of litter clean-up should be apportioned across producer groups identified under Articles 8(2) and 8(3).</p> <p>For that reason, it is necessary to agree on a methodology for defining the costs which meet the Directive’s requirement for a cost-efficiency. At the same time, the calculation methodology shall be developed in a way that allows for the costs of cleaning up litter to be established in a proportionate way (as per Article 8.4). Moreover, costs should be only related to the cleaning up of litter in public spaces, as the nature of litter is something discarded in a public space, excluding places widely accessible but under the management responsibility of private entities for commercial purposes (e.g., private roads, private beaches, private events etc.).</p> <p>Calculation should be related only to the collection of tobacco products with filters, <b>based on weight</b> is the most used method and commonly acceptable across the tobacco industry.</p>	
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		In regards to measures for informing consumers and provide incentives for the adoption of responsible behavior (Article 10), it is important. All decided activities on this issue should serve the purpose of Article 10, which is to <b>raise awareness</b> amongst the consumers and provide them (to the possible extend) with incentives for adopting a responsible consumer behavior. For that reason, it is important to messages that will be developed to depict and fulfill this need as well as ensure efficient spending	
Comments submitted during stakeholder consultation meeting on 17 <sup>th</sup> January 2022			
1	Timothy Alden  Malta Chamber of Commerce	<ol style="list-style-type: none"> <li>1. How will the cost of the EPR scheme be calculated? Do we have an indication as this stage?</li> <li>2. Which companies will be effected by EPR? Its targeted at producers but most of these products will be imported not produced.</li> <li>3. What is meant by producer?</li> </ol>	<ol style="list-style-type: none"> <li>1. It depends on the type of products and the associated additional costs to be borne by producers, as well as the modalities whereby such additional costs will be borne by the relevant economic operators. In any case, the SUP Framework Regulations clearly stipulate that such costs shall be established in a transparent manner between the actors concerned. With respect to the costs of clean-up litter, the draft Regulations state that only the costs of clean-up activities subject to ERA's pre-approval will be allocated to producers/Producer Responsibility Organisations.</li> <li>2. Producers of certain packaging will be impacted. Those are already being covered by the existing EPR scheme established under S.L. 549.43. New producers like tobacco producers and the producers of certain fishing gear will be facing new obligations which arise from the new SUP directive.</li> <li>3. Producer is a natural or legal person who first places a particular product on the market in Malta. By way of example, producers can be importers, local manufacturers or economic operators established in another Member State or third</li> </ol>

			country who sells products directly to private households or to users other than private households in Malta, by means of distance contracts (e.g. online sales).
2	Peter Wirth Alf Mizzi and Sons	There will be plastic products which will need to be marked in English and Maltese. Are there any particular range or category of products?	The list of products that need to be labelled in accordance with the Commission Implementing Regulation (EU) 2020/2151, are: sanitary towels (pads), tampons and tampon applicators; wet wipes; cups for beverages; and tobacco products with filters, and filters to be used with certain tobacco products.
3	Stephen Bonnici General Soft Drinks	<ol style="list-style-type: none"> <li>1. In terms of the mandatory targets on recycled plastic content, If a producer elects to be considered individually, and the country as a collective does not achieve its environmental targets, will he still be eligible to pay the environmental fee individually?</li> <li>2. In terms of the amendment to the BCRS regulations, there is a methodology that will allow for the clearing up of litter. Can we have clarifications on that.</li> </ol>	<p>1) If a producer wishes to achieve such targets individually as per draft SUP Framework Regulations, and he does attain the applicable target, then he/she will not be subject to the penalty should the country fail to achieve such target.</p> <p>2) Such methodology is yet to be established. Having said so, the draft stipulates that such costs shall be limited to the clean-up activities subject to the pre-approval of Circular Economy Malta and shall be established in a transparent manner between Circular Economy Malta, the operator of the BCRS scheme and any other actors concerned.</p>
4	Thais Amaral Malta National Aquarium	Is the SUP directive including the biodegradable options as well, made out of organic?	<p>The SUP Directive and as well as national SUP Framework Regulations are clear in this aspect, i.e. the plastic products covered by the Directive will be subject to our national regulations irrespective of whether they are biodegradable and compostable according to the current harmonised standard or otherwise.</p> <p>The reason is very simple since the current harmonised standard is for biodegradability and compatibility at industrial establishments and not at ambient conditions. If such biodegradable plastic products were to be excluded, then people might be misled on the understanding that such products can even be disposed of in the sea as they would biodegrade over a short period of time, but this is not the case.</p>

			However the directive includes also a review clause by 2027, whereby the Commission shall assess the directive vis a vis technological development and policy development, and through this review there might be a proposal to amend the directive to exempt certain products.
5	Mary Gaerty  Green Skips Services Ltd	<ol style="list-style-type: none"> <li>1. Will compostable and biodegradable food containers still need to be recycled in the same way as other or is there an imposition on them as well?</li> <li>2. How is it envisaged that these containers be recycled if they are non-recyclable but only recycled through composting?</li> <li>3. If I take a reusable container to the supermarket to be filled at source, many do not accept them for health reasons. Since degradable DW2 plastic is not acceptable why are Government tenders still being issued with DW2 plastic?</li> </ol>	<ol style="list-style-type: none"> <li>1. Owing to the fact that biodegradable and compostable SUP food containers are not excluded from the scope of the SUP Directive, the same obligations which apply to any SUP containers, apply also to these products, even if they are biodegradable and compostable according to the current harmonised standard.</li> <li>2. While it was reiterated that biodegradable and compostable SUP items are not excluded from the scope of the SUP Directive and proposed national legislation, by no means such legislation affects waste treatment routes vis-à-vis such biodegradable and compostable SUP products. . The current legislation and obligations regarding waste management still apply. This SUP Directive adds further on that and targets specifically the ten items which were found to be most harmful to the environment and to those 10 items there are added measures that would need to be adhered by member states. The absence of a harmonised standard on biodegradability and compostability of such products in the natural environment does not give us the comfort that these do not harm the environment. Hence, such products are included in the scope of this directive.</li> <li>3. Due to current health situation it may not be recommended to do so but this is temporary in nature whereas the environmental problem would be long term. Thus, the government is already offering incentives to establish green corners in supermarkets.</li> </ol>

6	Luca Amato  Fenech & Fenech Advocates	<ol style="list-style-type: none"> <li>1. Who is expected to determine whether a product is single use or reusable? Is there a particular standard that ERA expects stakeholders to abide by?</li> <li>2. Can I declare something to be reusable? How is enforcement carried to determine that the product which I wrongly declared as reusable is in fact an SUP.</li> <li>3. In relation to regulation 4 – catering establishments shall inform consumers of reusable alternatives, will there be some kind of guidance as to what the communication needs to be?</li> <li>4. In relation to Regulation 6, there is a period allowed for stickers, when will the imposition of this regulation be enforced?</li> </ol>	<ol style="list-style-type: none"> <li>1. To date, there is no standard in the SUP Directive on reusability of plastic products. However, for those plastic products that are packaging within the meaning of the Packaging and Packaging Waste Regulations (S.L.549.43), there exists essential requirements on the reusable nature of packaging put on the market and related harmonised standard.. For other products a case by case assessment needs to be carried out, taking into proper consideration the definition of SUP product, namely a plastic product that has not been designed, conceived and placed on the market to be re-used multiple times. In this context, it was also pointed out that truly reusable plastic products, especially the ones that come in contact with food-, need to be able to fulfil a number of specific product requirements while being reused multiple times.</li> <li>2. A certification has to be provided by the original manufacturer to the Authority. Products which are placed on the market as reusable have to be properly tested to prove that they can fulfil the applicable product requirements while being reused multiple times.</li> <li>3. It was confirmed that regulation 4 reflects the intention of the Maltese government to take measures to reduce the consumption of the targeted SUP products as per the obligations set out in the SUP Directive. It was also explained that certain specificities, such as the amount or the fees, as well as the modalities whereby this regulation will be implemented will be worked out at a later stage. They will be</li> </ol>

			<p>established by the Minister through publication of a notice in the government gazette. Stakeholders were invited to come forward with suggestions and ideas on how the government can improve the draft legislation.</p> <p>4. Officials confirmed that once the draft national legislation transposing the SUP Directive has been adopted, the imposition of this regulation will be enforced.</p>
7	<p>Mauro Miceli LIDL Malta</p>	<p>Mandatory recycled plastic content of 25% of PET plastics in plastic bottles by 2025. How is this going to be calculated? How is it going to work?</p>	<p>In line with Art. 6(4) of the SUP Directive, the draft SUP Framework Regulations have been drafted with a view to offering maximum flexibility to producers. Hence, producers may opt to either comply individually or collectively. In addition, calculations are to be made on the average of their placement on the market of the targeted bottles: namely the said Regulations do not require that each and every PET bottle placed on the national market shall contain, as a minimum, 25% of recycled PET, but rather that their total placement on the market of all PET bottles consists, on average of 25% recycled PET. In order to ensure compliance with these new targets, producers are obliged to submit audited information to the competent authority, ERA, within 4 months following the closing of the year.</p>
8	<p>Mario Sciberras Alfred Gera &amp; Sons</p>	<p>1. Is the law in place or is there a time when to use the marking and from where do we get the text to use in the markings?</p>	<p>1. Markings are published as part of the relevant <a href="#">Commission Implementing Regulation</a>. Manufacturers need to provide markings as required under this Implementing Regulation on the individual items as specified therein. Importers are to make sure that the manufacturer from whom they import, provides them with goods already marked</p>

		<p>2. Should markings be printed locally? Do we have to have dual languages since English is an official language in Malta?</p>	<p>2. The Implementing Regulation states that the markings must be carried out in the official language or languages of the Member State.</p> <p>This is an EU Directive so anyone who wishes to sell to the Maltese market they need to have their labels according to the EU requirement.</p>
9	<p>Ivan Cardona Food Chain Ltd</p>	<p>a. Those who have already received beverages containers with English markings only what will happen? Beverage cups which have already been imported but have only a marking in English only not in Maltese,</p> <p>b. Beverage container lids, are there any indication of what lids are to be used? What about paper cups with plastic lids?</p>	<p>a. Stickers can be attached to SUP cups for beverages placed on the market until 3<sup>rd</sup> July 2022. As from 4<sup>th</sup> July 2022, the markings shall be printed. In the case of cups for beverages, marking are to be printed on the cup itself rather than its packaging. Notably, for products placed on the market in Malta prior to July 2021, no sticker or marking is required.</p> <p>b. This is already indicated in law currently in force : after 2024 beverage containers with a capacity of up to three litres with plastic lids are to be designed that once opened, the lids remain attached to the containers.</p> <p>Lids that are part of the cups are subject to the same requirements as SUP cups. Hence, they could also be subject to the proposed consumption reduction measures and could eventually be banned from certain places and cannot be provided free of charge.</p>
10	<p>Jason Degiorgio  Westin Dragonara &amp; Beach Club</p>	<p>Do we have to ask our guests for an additional charge as from 2023?</p>	<p>The fee, which will come into effect following publication of a notice in the Government Gazette, will be applicable for food and beverages containers to be purchased and consumed as take aways.</p> <p>Regarding the food and beverages consumed on site, including beach lidos, these need to switch to reusable alternatives.</p>

11	Matthew Dimech BCRS Malta Ltd	With regards to the EPR, producers need to cover additional costs – waste collection for those discarded PET bottles including transportation and cleaning of litter. How can these fees be calculated?	Methodology is under development. In line with the SUP Directive, the draft amendments to the BCRS regulations state that such additional costs shall be established in a transparent manner between all actors concerned.  With regards to the cost of clean up litter (arising from SUP beverage containers), not all activities will need to be financed by producers, but only those activities that carried out by the public authorities or on their behalf. Such activities need to be pre-approved by Circular Economy Malta.
12	Timothy Alden Malta Chamber of Commerce	With regards to Regulation 4, what comes as an adequate incentive for people bringing in their own container especially in supermarkets?	Incentives shall be provided by catering establishments. The draft legislation is very flexible on this matter. The intention of the government was to minimise impacts on such economic operators, whilst also fostering creativity and also competition between such establishments.  Adequate incentives might be a discount or a loyalty card. For instance, if one brings his own reusable cup to a bar to have a coffee, he could get a discount or, alternatively, can be offered a free coffee if he brings the cup for example ten times to the same bar.
<b>Comments submitted during public consultation meeting on 18<sup>th</sup> January 2022</b>			
1	Carmel Galea	Rigward it-tazzi tal kartun li fihom il plastic, fuq liem tazza irid ikun hemm l-isticker.  Sa liema data jistghu jigu mibjugha minghajr it tabella?	Skont ir-regolamenti ta l-Unjoni Ewropea, sal- 4 ta' Lulju 2022 tista' titwaħħal sticker fuq il-prodotti li jitqiegħdu fis-suq (li jigu importati jew mmanufatturati lokalment). Wara din id-data, prodotti bl-isticker ma jistgħux jitqiegħdu fuq is-suq u t-tabelli iridu jkunu sstampati fuq it-tazzi minn min jimmanufatturahom qabel ma jitqiegħdu fuq is-suq.

2	Francis Magri	<p>Il-problema tiegħi hi it-tazzi tal-gelat, li 80% tagħhom gew impurtati. X'se naghmel fl-istokk li fadalli?</p> <p>Rigward il-kucċarini tal-plastic li jitqassmu mal-gelat, x'se naghmel bl-istokk li għad fadalli? Jintremew?</p>	<p>It-tazzi tal-ġelati m'humiex qegħdin jiġu pprojbiti, iżda għalihom japplikaw ċertu miżuri. Jekk it-tazzi tal-ġelat huma tazzi tax-xorb normali, li s-soltu jintużaw għax-xorb, allura dawn għandom bżonn l-immarrar/tabella/sticker. Jekk it-tazzi huma magħmulin u użati biss għall-ġelat, f'dak il-każ m'humiex meqjusa bħala "tazzi għax-xorb" għal fini tar-regolamenti u d-Direttiva. Għaldaqstant, m'għandhomx bżonn l-immarrar. Iżda f'kull każ jaqgħu taħt ir-regolament 4 – jiġifieri ħa jkun hemm ħlas fuqhom għat-<i>take away</i> u ma jistgħux jintużaw għal konsum fuq il-post ("eat-in").</p> <p>Fuq il-kuċċarini tal-plastic, dawk setgħu jibqgħu jintużaw biss sal-24 ta' Frar 2022. Dak li jibqa' jista' jiġi mogħti bħala donazzjoni mingħajr ħlas lil xi organizzazzjoni tal-karità, jew esportat lejn pajjiż li għadu jżahom jew jista' jintbagħat għar-riċiklaġġ. Din hija kwistjoni li għet trattata fl-liġi li diġa' għet promulgata (Avviż Legali 499 tal-2021) u tmur lil hinn mill-ambitu tal-konzultazzjoni pubblika in kwistjoni.</p>
3	Chat Query	Kontenituri ta' l-ikel tal-kartun jinkludu wkoll huma inkluzi bhal SUP?	Jekk kartun biss m'humiex meqjusa bħala SUP, imma jekk ikollom il-lega tal-plastic magħhom dawk meqjusin bħala SUP.
4	Robert Zammit Excelsior Hotel	<p>Meta se tigi fis-sehh l-obligu tal-ħlas fuq il-kontenituri? U kif?</p> <p>Min fejn nista jkolli access għal din il-prezentazzjoni?</p>	<p>Għalissa għad m'hemmx speċifikat kemm u meta se jiġi fis-seħħ l-obligu tal-ħlas, iktar dettal fuq it-tariffi u l-modalitajiet li bihom se jiġi implimentat dan ir-regolament se jinħadmu fl-istadju li jmiss u ħa jiġu stabbiliti mill-Ministru permezz ta' pubblikazzjoni ta' notifika fil-gazzetta tal-gvern.</p> <p>L-għan ewlieni ta' dan il-ħlas hu li jitnaqqas il-konsum ta' dawn il-prodotti, kif mitlub mid-Direttiva, mhux biex joħloq dħul monetarju lil-gvern. Il-poplu għandu jkun mgħarraf li qed iħallas għall-użu tal-kontenituri tal-plastik minħabba li dawn iħammgu l-ambjent.</p> <p>Il-prezentazzjoni tinsab fuq is-sit elettroniku tal-ERA.</p>

5	Carmel Galea	<p>It-Tazzi tal kartun ghadom m'humiex sostitwibli. It-tazzi tal kartun li jkollom kisja rqiqa ta plastic, ovjament biex ma jitherrewx meta jixxarbu jitqiesu bhala plastic.</p> <p>Tazza tal-kartun biss irid ikollhom it-tabella?</p>	<p>It-tazzi li fihom plastik (anki jekk kisja rqiqa) għandu jkollhom tabella li tgħid li fihom il-plastik fuq kull tazza skont ir-regoli tal-UE.</p> <p>L-għan ewlieni ta' din id-direttiva hu li jitnaqqas l-użu ta'dawn il-prodotti.</p>
6	Chat Query	<p>Il-kaxxi ta' take away ghandu jigi mitlub hlas ghalihom?</p>	<p>Jekk il-kontenituri huma "single-use" u fihom il-plastik, il-proposta qiegħda li dawn ma jistgħux jingħataw b'xejn ma' ikel li jittieħed take away, u jekk l-ikel li jinxtara ħa jigi kkunsmat fuq is-sit, dan m'għandux jigi servut f' kontenituri/platti tal-plastik.</p>
7	Chat Query	<p>Dan jghodd ukoll ghal laned tal minerali (soft drinks)?</p>	<p>Il-bottijiet tal-aluminium m'humiex parti minn din il-liġi.</p>
8	Green Roots	<p>Bhalissa nsibu fl-Ewropa tazzi tal kartun li m'humiex miksijin bil plastik. Tista tazza tal-kartun bhal din tigi accettata mingħajr ma jkollha tabella? Minhabba li diffiċli tingħaraf.</p>	<p>F'dan il-każ dan jigi vvalutat każ b'każ.</p> <p>Kullhadd huwa mheggeg iressaq il-mistoqsijiet li jkollu lil: <a href="mailto:info@era.org.mt">info@era.org.mt</a>;</p> <p>jew tistgħu tagħmlu kuntatt dirett mal-Awtorità minn fuq is-sit elettroniku tagħha.</p>
9	Chat Query	<p>Jekk softdrink jigi servut f'tazza tal-pastik fuq il-bajja, dan ghandu jkollu it-tazza bit tikketta magħmula mill-istabiliment li servih jew mill produttur tat tazzi?</p>	<p>Fil-mizuri proposti, l-ikel u xorb ikkonsmat fuq il-post ma jistax jigi servut f'SUP. Il-Lidos huma mheggin biex iservu xorb f'tazzi li jintużaw aktar minn darba. L-SUP jistgħu jintużaw biss għall-<i>take aways</i>, iżda bil-ħlas, u dawn għandhom ikollhom l-istampa/sticker/immarkar fuqhom skont ir-regoli tal-UE.</p>

10	Joe Doublet	<p>Il-canteen ghandhom iservu biss f'kontenituri tal kartun? Jew f'xi kontenituri li m'humiex plastiks?</p>	<p>Fil-mizuri proposti, l-ikel u xorb ikkonsmat fuq il-post ma jistax jigi servut f'SUP. Jistghu allura juzaw kontenituri li jintuzaw aktar minn darba , bhal tazzi talhgieg, platti tal-ghgieg u pozati tal-hadid li jistghu jinhaslu u jergghu jintuzaw.</p> <p>Jekk ma jistax isir hekk, irid jintuza materjal li m'huwiex <i>single-use</i> plastic.</p>
11	Gordon Vassallo	<p>Hawn supermarkets li jgezwru l-perzut etc fil-karti imbaghad ipogguh f'borza tal-plastik. Din hi accettabli?</p>	<p>Din il-ligi proposta ma tirrestringix il-boroż tal-plastik – dawn huma regolati taht ir-Regolamenti dwar Restrizzjonijiet fuq it-Tqeghid fis-Suq tal-Basktijiet tal-Plastik Hfief (L.S. 549.139), fejn tgħid li boroż tal-plastik li huma hfief hafna (<i>very lightweight</i>) li jintuzaw għal-raġuni ta' igene jew ipprovduti bhala ippakkjar primarju għall-ikel sfuz meta dan jgħin għall-prevenzjoni tal-hela tal-ikel huma aċċettabli.</p>
12	Clayton	<p>Jekk f'tieg xorb jisserva f'tazzi tal-hgieg imma minn fliexken tal-plastik li hu SUP, dawn ghadhom accettati?</p>	<p>Iva, il-fliexken tax-xorb li huma tal-plastik, għadhom fuq is-suq u ġew trattati bil-BCRS (L.S. 549.139).</p>
13	Joe Attard Green MT	<p>Fejn tidhol l-EPR, kif se tinkwantifikaw il-gbir ta' skart jew tindief li jsir, li jirrizulta minn kontenituri ta' l-ikel, xorb etc.? ha jkun hemm xi sistema jew metodogija kif din l-ispiza ta gbir ta skart se tigi kwantifikata?.</p> <p>Hemm xi metodologija ta kif se jigi irregolat li il kontennituri tal-plastik, ghandu 25% jew 30% kontenut riciklabbli?</p>	<p>Bhalissa metodologija għadha mhijiex determinata. Għat-tindif taż-żibel, għandha tinhareg gwida mill-Unjoni Ewropea dwar kif ha jigu kkalkulati l-ispejjeż tat-tindif tal-iskart. <i>Clean up campaigns</i> għandom jigu approvati mill-ERA.</p> <p>Fuq <i>public awareness</i> m'hemm l-ebda linji gwida fuqhom. Izda bhalissa l-iskemi diga' għandhom obliġi ta' <i>public awareness raising</i> taht il-legislazzjonijiet tal-iskart.</p> <p>Dawn it-targets (tar-riciklagg) huma aktar indirizzati lejn il-manifattur tal-fliexken. Id-Direttiva theggeg l-użu ta' aktar plastik riciklat fil-fliexken tal-plastik.</p>

14	Chat Query	Nixtieq aktar informazzjoni dwar il fishing gear	<p>Din hija miżura li toħrog mill-qafas Ewropew. Sal-aħħar tas-sena 2024, min qed ipoġġi materjal għas-sajd li fih il plastic fuq is-suq, ħa jkun sugġett għall-EPR (<i>extended producer responsibility</i>). Id-dettalji tas-sistema ħa jiġu stabbiliti fi stadju aktar tard.</p> <p>Is-sajjieda m'humix meqjusa bhala produttori, sakemm ma jkunux qed jimportaw il-materjal direttament minn barra huma stess.</p>
15	Mark Mifsud	Tista tergghu tirrepetu minn meta it tazzi irid ikollom il tikketti.	<p>Minn meta tidhol fis-seħħ din il-liġi. L-istickers jiġu aċċettati biss għal dawk il-prodotti li ħa jitqiegħdu fuq is-suq qabel l-4 ta' Lulju 2022. Wara din id-data, t-tabelli jridu jkunu stampati fuq il-prodott minn min jimmanufatturhom qabel ma jitqiegħdu fuq is-suq.</p>
16	Massimo Vassallo	Rigward l-informazzjoni li għandha tidher fuq it-tikketta, hemm xi dizin jew informazzjoni diga mahsub. Hemm xi tikketti diga idizzjati għal tazzi tal kartun>	<p>Il-format u dizinn għet stabbilità bil-liġi tal-UE biex ikun armonizzat fl-Unjoni:</p> <p><a href="https://eur-lex.europa.eu/legal-content/MT/TXT/HTML/?uri=CELEX:02020R2151-20201218&amp;qid=1646049879088&amp;from=EN">https://eur-lex.europa.eu/legal-content/MT/TXT/HTML/?uri=CELEX:02020R2151-20201218&amp;qid=1646049879088&amp;from=EN</a> (test bil-Malti)</p> <p><a href="https://eur-lex.europa.eu/eli/reg_impl/2020/2151">https://eur-lex.europa.eu/eli/reg_impl/2020/2151</a> (test bl-Ingliż)</p> <p>Dawn japplikaw għat-tazzi li fihom il-plastikk u normalment dawn l-affarijiet isiru mill-manifattur tat-tazza.</p>
17	Fletcher Zoe Jay Local Council Association	<p>X'se jigri bi fliexken li jkun fihom bejn 25% u 30% plastik riciklabli fihom?</p> <p>Se jkun hemm xi kollezzjoni separata għalihom?</p>	<p>Fir-rigward ta' prodotti li fihom element ta' plastik riciklabli fihom, m'humix se jkollhom sistema ta' għbir separata għalihom. Fil-fatt se jkunu jagħmlu parti mill-BCRS li għandha tibda topera fis-sena 2022.</p>

19	Joe Attard Green MT	Rigward it tlett Avizi Legali li hawn abbozzati, jistghu dawn l-abbozzi jkunu accessibli ghal konultazzjoni publika? Jew wara din il konsultazzjoni se toholqu abbozzi ta Avizzi Legali?	Hemm 3 abbozzi lesti u aċċessibli mis-sit elettroniku tal-ERA: <ol style="list-style-type: none"> <li>1. Regolamenti dwar Qafas dwar Prodotti tal-Plastik li Jintużaw Darba Biss;</li> <li>2. Regolamenti li jemendaw ir-Regolamenti dwar Restrizzjonijiet fuq it-Tqegħid fis-Suq ta' Prodotti tal-Plastik li Jintużaw Darba Biss (Emenda); u</li> <li>3. Regolamenti li jemendaw ir-Regolamenti dwar ir-Riċiklaġġ ta' Kontenituri tax-Xorb.</li> </ol>
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