



## ***Din I-Art Helwa***

Climate Change Committee,  
Ministry for Resources and Rural Affairs,  
Barriera Wharf,  
Valletta CMR 02.  
Malta

8th March 2009

Dear Sirs,

Din I-Art Helwa welcomes the Climate Change Committee's consultation report on the National Strategy for greenhouse gas emissions and augurs that the recommendations are speedily taken on board by Government. While we are in agreement with many of the recommendations, we would like to make the following comments on certain aspects of the report.

The EU Emissions Trading Directive is a strategy that does not directly address the problem of reducing carbon emissions. There is little or no evidence that the Directive is leading to any reduction of greenhouse gases in real terms. It is in fact an unmanageable scheme in its present form and needs to be radically reviewed.

Din I-Art Helwa feels that legislation on Climate Change and Sustainable Energy is the way to go since it ensures a strong political will to pursue all the related issues.

Din I-Art Helwa endorses the proposal to constitute an Inter-Ministerial Committee for Climate Change, that will be politically empowered to enforce targets and policies on the various stakeholders. However the proposed Department for Climate change within the Ministry for Resources and Rural Affairs seems to have the same function as the Inter-Ministerial Committee for Climate Change mentioned in REC 15. This appears to be a duplication of effort.

There is no leadership drive behind the proposal to develop a strategic plan for Research and Innovation in Energy and Environment. This drive should come from the proposed Inter-Ministerial Committee for Climate Change.

The proposed policy for RES is somewhat restrictive in the sense that financial aid and feed-in tariffs are envisaged only for PV and wind technologies. Other emerging advanced solar technologies exist that are suitable for Malta's climate such as Concentrated Solar Power

which is suitable for steam and/or power generation, refrigeration and air conditioning. The footprint required is similar to that required by PV panel making them highly suitable for use in Malta. Large electric generating 'farms' generating hundreds of megawatts of power have already been installed in Israel, Spain and in the USA, while solar air conditioning plants using absorption chillers are already commercially available.

The National Strategy report lacks incentives for the private sector to promote and adopt innovative solutions. A more holistic approach is required in which more attractive feed-in tariffs are specified for all RES generated electricity and not just limited to that generated by Photo Voltaic technology. Furthermore, tax or other incentives are required to create the infrastructure for private enterprise to invest in innovative technologies such as Solar Thermal steam generation, refrigeration and air conditioning, hydrogen cracking and water distillation.

No reference to privately-owned all-electric and hybrid electric vehicles is made in the Report. This is a growth sector in green transport, and many models are already available on the market. Incentives should be introduced for private owners to purchase this type of vehicle.

We trust that our comments will be taken into consideration.

Yours faithfully,

George Camilleri  
Council Member – Din I-Art Helwa