Consultation

Report on Night-Time Waste Collection in the Port Region

Prepared by the Port Regional Council

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Kunsill Reġjonali Port

Port Regional Council

Introduction

Following the Ministry for Transport and Infrastructure's proposals aimed at reducing traffic congestion, the Port Regional Council initiated a regional consultation to explore the feasibility of night-time waste collection. The consultation involved discussions with Local Councils, the main contractor, and three subcontractors to assess the potential operational, logistical, and community impacts of such a policy shift.

However, it is important to note that no comprehensive datasets currently exist to demonstrate that daytime waste collection directly contributes to traffic congestion in the Port Region. Similarly, there is no empirical evidence available to confirm that shifting waste collection to night hours would significantly reduce congestion or improve traffic flow.

This lack of data underscores the need for careful, evidence-based policymaking. The Region has therefore undertaken this consultation not only to gather stakeholder views but also to identify knowledge gaps and determine what further studies or pilot projects may be required before taking an informed decision on the matter.

Current Waste Collection System

Waste is currently collected during the daytime, typically between 7:00 AM and 4:00 PM. The service includes domestic, recyclable, and organic waste, coordinated on a rotational schedule across localities. In addition to these, commercial recyclable waste is specifically collected every Thursday, ensuring regular service for the business community.

Challenges in the Current System

Despite the day-to-day continuity of waste collection operations, several systemic and operational challenges persist within the Port Region's current setup:

Narrow Streets and Topography in Historic Localities:
Localities such as Valletta, Birgu, Isla, and Bormla are characterised by very narrow streets, multiple steps, and tiered roads, making it impossible for RCVs to navigate directly. This necessitates piling of waste in accessible zones, which increases labour demand, reduces collection speed, and affects street cleanliness.

Unregulated Commercial Disposal:
Many commercial and catering establishments dispose of waste at night or outside their allocated slots. This leads to overflowing bags, non-compliance with waste types, and strain on the residential collection system.

Odours and Vermin From Uncollected Waste:
Especially during the summer, organic waste left outdoors attracts rodents, cats, and insects. The presence of pests not only lowers sanitation standards but also increases clean-up costs and resident complaints.

Workforce Constraints and Local Preferences:
Contractors face serious difficulties in recruiting field workers, as many locals opt for public employment within the government's public cleanliness sector, which offers more security and benefits. As a result, private contractors increasingly rely on migrant workers to deliver their services, sometimes facing language, training, and retention issues.

Parallel vs Simultaneous Collection Models:
Due to a 2023 decision by all 11 Local Councils to retain morning collections, waste services must run parallel collection routes rather than a region-wide, simultaneous schedule. This duplication limits efficiency increases costs, and strains available resources.

Lack of Regional Integration:
Although regionalisation was introduced to create a more unified and cost-effective waste management system, operational practice remains fragmented. Many RCVs are still restricted to specific localities, rather than collecting across zones until full capacity is reached and delivering directly to Wasteserv—undermining the potential for economies of scale.

Lack of Digitalisation and Real-Time Coordination:
The Region and the main contractor both face major setbacks due to limited use of digital systems for real-time data, smart routing, complaint handling, and workforce allocation. Daily operations are often managed manually, slowing response times and reducing transparency.

These interlinked challenges make it clear that transitioning to a more efficient and possibly night-time system will require structural reforms, better digital infrastructure, and stronger coordination between regional authorities, contractors, and local councils.

Concerns from Waste Collectors

During a dedicated consultation meeting held with the main contractor and the three subcontractors operating within the Port Region, several operational concerns were brought forward. These issues reflect the real, on-the-ground experiences of those responsible for executing waste collection services and highlight significant barriers to the potential shift toward night-time collection:

Black Bags Left Overnight:
Waste collectors noted that household black bags placed outside during the night are more likely to be torn open by stray cats and pests. This leads to scattered refuse, hygiene issues, and additional clean-up burdens the following day.

Glass Collection Noise:
The collection of recyclable glass waste at night is particularly disruptive due to the sound of bottles and containers being emptied into trucks. This could lead to public complaints and conflict with residents, especially in quiet or residential neighbourhoods.

Summer Nightlife in Touristic Areas:
In places with an active summer nightlife, such as Valletta and the Three Cities, night-time waste collection is complicated by crowded streets and outdoor dining areas, making it difficult to operate discreetly or safely during the evening hours.

Access in Narrow Streets:
Historic cores like Valletta and Birgu feature narrow alleyways and stepped zones that prevent vehicle access. Waste must be manually gathered and transported to piling points, which can also be a source of noise pollution during the night.

Seasonal and Event-Based Disruptions:
Road closures during village feasts (festi) and weekly open markets (swieq fil-beraħ) frequently block access routes for collection vehicles and other traffic flow. These activities, which are deeply rooted in local tradition and commerce, create major congestion and traffic build-up, often forcing waste collection teams to reroute or postpone pickups—further straining schedules and reducing efficiency.

Low Visibility:
Black bags are harder to see at night, especially in poorly lit streets. This increases the likelihood of missed bags, delays, and inefficient collection.

Illegal or Incorrect Parking:
Many roads are inaccessible at night due to improperly parked vehicles, preventing RCVs from passing or reaching scheduled pickup points, which leads to incomplete routes.

Commercial Abuse of Collection System:
Waste collectors report that more businesses and catering establishments will take advantage of the night-time window by placing out excessive or unregulated waste with household refuse, overwhelming the system and increasing tipping fees for the Region.

Inadequate Street Lighting:
Many streets lack sufficient lighting, which compromises worker safety and vehicle navigation. Poor visibility also increases the likelihood of accidents or collection errors.

RCV Truck Faults and Approval Delays:
When a collection truck breaks down, the contractor is required to report the fault and await permission from the Region to use an alternative RCV. This process causes delays and operational downtime.

Complaint Management and Operational Duplication:
If complaints are received in the morning about missed collections, a second truck must be dispatched—separate from the night shift—placing further strain on limited resources.

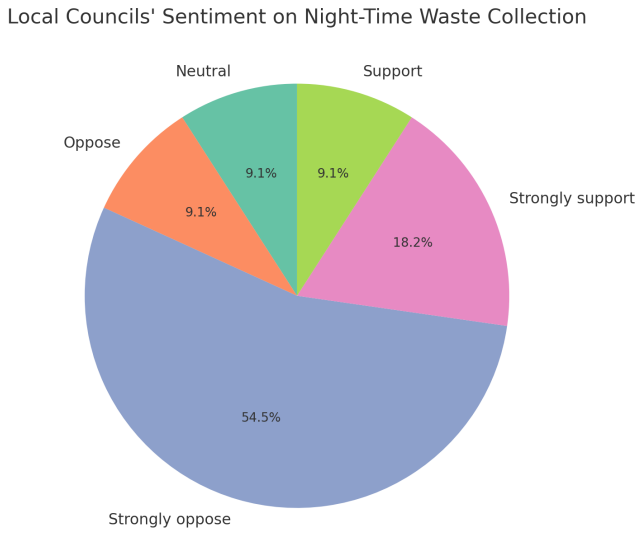
Night Shift Labour Shortages:
Contractors continue to struggle with recruiting workers for night shifts. Most local workers prefer employment within the government's public cleanliness sector, leaving private contractors to rely heavily on migrant labour, which introduces challenges in training, retention, and workforce consistency.

These concerns collectively highlight the logistical, regulatory, and human resource challenges that must be addressed before night-time waste collection can be implemented successfully and sustainably across the Port Region.

Local Councils' Feedback Analysis

To ensure a fair and representative understanding of each locality's position on the proposal for night-time waste collection, the Region issued a structured questionnaire to all Local Councils. Councils were invited to discuss the matter internally, with the mayors encouraged to consult with all councillors and submit a unified response that reflects the collective position of the local authority. As a result, one response per Local Council was officially recorded, representing the consensus view of each locality.

The responses were then categorised based on levels of support or opposition to night-time collection. The pie chart below illustrates the sentiment across the eleven Local Councils within the Port Regio



- Strong Support or Support:
Valletta, Bormla, Żabbar.

- Strong Opposition or Opposition:
Birgu, Isla, Kalkara, Paola, Fgura, Xgħajra, Tarxien.

- Neutral Sentiment:
Floriana.

The top concerns raised by Local Councils regarding night-time waste collection. The three most concerning issues, each identified as the top concern by 6 councils, are:

- **Noise Disturbance**
- **Missed Collections**
- **Customer Care**

Correlation Between Concerns and Support for Night-Time Waste Collection

To better understand the relationship between local sentiment and specific operational concerns, a correlation analysis was carried out between each council's level of support for night-time waste collection and their ranked concerns. Each council response was scored on a scale from 1 (Strongly Oppose) to 5 (Strongly Support), and this was then statistically compared with their rankings of various issues such as noise, parking, worker safety, customer care, and missed collections.

The results revealed a strong negative correlation (−0.96) across all concern categories. This means that:

- Councils that ranked these concerns as more serious (closer to 1) were far less likely to support the idea of waste collection after 9 PM.
- Conversely, those who supported the measure did not consider these issues to be major obstacles.

This finding clearly indicates that addressing these five core areas—Noise Disturbance, Parking Problems, Worker Safety, Missed Collections, and Customer Care—will be critical if the Region is to build consensus around any shift to night-time operations.

The data suggests that any successful policy change must be accompanied by targeted interventions that mitigate these specific concerns, especially among more cautious or opposed Local Councils.

Main Concerns Among Supporters of Night-Time Waste Collection

An analysis was conducted to identify the primary concerns among Local Councils that expressed support or strong support for night-time waste collection. While these councils were generally in favour of the proposal, they still recognised key operational challenges that would need to be addressed for a successful rollout.

The data shows that supporters consistently rated the following five concerns with an average level of **3.0** on a scale from 1 (most concerning) to 7 (least concerning):

- **Noise Disturbance**
- **Parking Problems**
- **Worker Safety**
- **Missed Collections**
- **Customer Care**

This indicates that while these councils are open to shifting waste collection to evening hours, they remain moderately cautious about how these factors could impact service quality, public satisfaction, and operational efficiency. Their support is therefore conditional on mitigating these concerns through clear planning, investment in quieter equipment, better lighting, improved routing, and enhanced public communication.

The Region should interpret this support as an opportunity—but also as a responsibility to address these issues proactively during any pilot phase or implementation.

Recommendations

Based on the feedback received from Local Councils and waste collection contractors, the following recommendations are being put forward to support a gradual, well-managed, and community-sensitive transition to night-time waste collection:

Pilot Projects in Selected Localities:
Before any region-wide implementation, the Region should launch carefully monitored pilot projects in a small number of diverse localities. These pilots will help assess operational feasibility, public reception, and logistical effectiveness in both urban cores and peripheral areas.

Strengthen Enforcement for Commercial Entities:
A stricter enforcement regime must be introduced to prevent commercial and catering establishments from disposing of waste alongside household refuse, particularly outside regulated hours. Clear penalties and monitoring systems should be established.

Establish a Dedicated Customer Care Centre:
A centralised and well-equipped customer service unit should be created to handle complaints, route inquiries, and assist residents in real-time, particularly in addressing morning follow-ups after night collections.

Improve Street Lighting for Safer Operations:
Poorly lit streets not only reduce visibility for collection crews but also increase safety risks and chances of missed pickups.

Launch Targeted Awareness Campaigns:
Public education and awareness campaigns should accompany the rollout of night-time collection. These should target both residents and businesses, explaining new schedules, compliance expectations, and the rationale behind the change.

Offer Incentives for Night-Shift Workers:
To address the current labour shortage and workforce reluctance to work during night hours, financial and non-financial incentives should be introduced to attract and retain personnel. This includes bonuses, transport allowances, and recognition schemes.

Adjust Equipment and Collection Schedules to Minimise Noise:
The Contractor should invest in quieter collection equipment and review scheduling practices (e.g. delaying glass collection to late morning) to reduce disturbances, especially in residential and touristic areas.

Revise Commercial Waste Disposal Regulations:
Updated guidelines should clearly define what constitutes commercial waste, require separation from residential waste, and assign clear responsibilities to businesses for appropriate disposal.

Review Legal Implications in Tender Documents:
Undertake a comprehensive legal review of the current waste management tender to assess whether it allows flexibility for night-time operations. This should include an analysis of contractor obligations, labour conditions, working hour limitations, and provisions for amendments to operational schedules. If necessary, legal adjustments should be proposed to align the contract with the intended reforms.

Consultation with residents:
it is critical that each Local Council thoroughly consults its residents before any transition to night-time waste collection takes place. Local Councils are in the best position to assess on-the-ground realities, localised sensitivities, and community readiness for change. Public engagement will

not only improve transparency and trust but also ensure that policy decisions are aligned with the daily needs and expectations of the people most affected by them. This community-focused approach will help shape more responsive implementation strategies and reinforce the Region's commitment to inclusive, citizen-centered service delivery.

Collection Points:
In urban cores and densely built-up areas—particularly alleys and narrow streets where door-to-door collection is impractical—Local Councils should consider establishing designated waste collection points. These would serve as clearly identified, well-maintained communal sites where residents can deposit their waste. This approach would improve efficiency, reduce physical strain on collection workers, and address long-standing accessibility challenges in older neighbourhoods.

These recommendations aim to balance operational needs with community well-being, ensuring that the transition to night-time waste collection is implemented effectively, fairly, and sustainably.

Conclusion

The consultation process conducted by the Port Regional Council has shed light on the complex realities of implementing night-time waste collection within an urban and historic context. While there is clear recognition of the benefits—particularly in terms of alleviating daytime congestion and improving service efficiency—these must be carefully weighed against logistical, legal, and operational constraints.

The concerns raised by Local Councils and waste contractors highlight the need for well-structured pilot projects, more flexible infrastructure, better enforcement mechanisms, and robust community engagement. Success will depend not only on equipment and labour logistics but also on public trust, legal clarity, and local ownership of the process.

In this context, the Port Regional Council also wishes to express its concern regarding the recent implementation of the Beverage Container Refund Scheme (BCRS), particularly its provision for door-to-door collections for residents aged 60 and over, as well as Blue Badge holders. While the scheme is commendable in its environmental objectives, it was introduced without prior consultation at the regional level. The Region is concerned that such a model, implemented without alignment with existing local waste strategies and collection frameworks, risks undermining operational efficiency and may exacerbate traffic congestion, especially in already dense and mobility-constrained urban environments.

The Port Regional Council stresses that any national initiative with direct implications on waste logistics, traffic flow, and urban planning must be integrated with regional consultation and coordination. Only through such alignment can we ensure coherence, efficiency, and fairness across all localities.

On behalf of the Port Regional Council, we reaffirm our commitment to advancing sustainable waste management through collaborative planning, evidence-based decision-making, and resident participation. We believe that with the right investments in digital tools, coordination, regulatory reform, and public dialogue, the transition to a more efficient and resident-friendly system is within reach.

The future of waste collection in the Port Region must reflect local diversity, operational realism, and environmental responsibility—and be guided by a shared commitment to improving quality of life for all residents.

Kunsill
Reġjonali
Port
Port Regional Council