

SME Chamber ANNUAL REPORT

2022

Malta Chamber of SMEs 43-45, Kapuċċini Street, Floriana FRN 1052, Malta Table of Contents

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HORIZONTAL ISSUES

Banking

I. Banking Services

During 2022 the Malta Chamber of SMEs intensified its efforts and pressures on authorities to tackle the various banking issues encountered by members.

Members on various occasions encountered issues related to the services offered and level of quality that keeps going down. Members have continued to report added bureaucracy, checks, excessive charges and a hostile encounter when dealing with banks.

This was also featured in the survey conducted by the SME Chamber which found that the second most worrying issue for businesses was not having adequate banking services, whereby 18% of business believed that adequate banking services was their top concern.

The immense bureaucratic burden and impossible situations businesses have been facing in relation to access to banking services and compliance have only become more serious and counterproductive over the last years. The Malta Chamber of SMEs has been highlighting its concern on the situation and how this is harming businesses and our economy.



Apart from this, the SME Chamber also asked the government to intervene to protect corporate bank clients from the abuse of dominant position, from unfair treatment and the imposition of unjustified costs and charges.

The Malta Chamber of SMEs notes that as a result of the pressures and media presence made, prior to the General Election, the Prime Minister has made a commitment to give access to banking services to all businesses and centralise all compliance efforts across the country. On various occasion, the SME Chamber emphasised that the banking market was still not operating in a healthy manner, in fact big imbalances were still present and clients were not being served in a satisfying manner.

Moreover, a bigger effort needs to be put in place in order to give access to basic and good quality banking service and to increase the choice for clients and competition.



The SME Chamber held several meetings with different authorities including the Malta Bankers Association, the banks themselves and the Finance Minister and the Economy Ministry.

II. Access to Finance

The Malta Chamber of SMEs also spoke on the different access to finance options available for businesses and the need to identify the gaps available and find innovative ways on how such gaps can be filled.

This includes other different financial tools such as the use of equity sharing. Additionally, the SME Chamber also noted that more awareness and education is needed, together with having the right legal framework in place to offer the safeguards needed.

The Malta Chamber of SMEs also worked closely with the Malta Development Bank to develop tools that help businesses to finance projects and investments through favourable interest rates and guarantees.

III. Steering Committee on regulating the right to Banking

During 2022, the SME Chamber greatly welcomed the measure announced by the Economy Minister Hon. Silvio Schembri, some of which come out of proposals pushed by the SME Chamber itself to address the deterioration if the banking services and the banking services and also the failures in the market functioning.

Enshrining the right to a bank account to self-employed and businesses is an important basic right that is a very good step forward.

The Government launched a Steering committee to define a common due diligence process so as to ensure consistency. Whilst the SME Chamber is in favour of having a robust and rigorous process, the Malta Chamber of SMEs

always maintained its position that businesses should not be overburdened with what is unnecessary, therefore much fine-tuning is required in that respect.

The process should also run efficiently and automated as far as possible. Additionally clear timeframes must be set to avoid undue delay, and provide better guidance to all stakeholders.

During 2023 the SME Chamber looks forward to seeing these measures implemented for the benefit of Malta as a whole and to ensure a fair and adequate eco-system for businesses to operate in Malta.

IV. Assisting Individual / Group Issues

During 2022, The SME Chamber has also assisted a number of members with specific and individual issues related with opening of bank accounts, delays with communication and also excessive charges that our members could not avoid, which threatened their livelihoods.

Notably the SME Chamber assisted a number of cash intensive business operations following a new policy implemented by Bank of Valletta on daily cash deposits through the use of the night safe. The new policy limited the daily cash deposits to Euro 10,000. Sectors directly affected with this new policy included Tobacco Distributors, Fuel Stations, vending machine operators and Lotto Receivers.

Following meetings held with Bank of Valletta officials, the SME Chamber managed to ensure an extension subject to finding a workable solution for the parties involved.

The Malta Chamber of SMEs has also vociferously voiced its concern over the account maintenance fees increase announced by Bank of Valletta in December 2022. Maintenance fees increase to Euro 30.00 monthly per account, something which the SME Chamber believe was unjustified and un-proportionate.



The staggering surge angered the Malta Chamber of SMEs, which had already disputed the €10 fee a few years back, arguing it was unjustified. PHOTO: Chris Sant Fournier.

Consumer Focus

The B2C dynamic is very important for the SME Chamber. This is also one of the main services that the SME Chamber has for its members.

Consumer demands change all the time and Covid caused a sudden shift. Businesses are expected to read consumer demands and adapt, as otherwise they will immediately start losing customers and market share. The SME Chamber helps in guiding members on changing and emerging trends. The SME Chamber's work on Consumer issues in 2022 focused on the following:

I. MCCAA Consumer Events

SME Chamber Vice President Marcel Mizzi and CEO Abigail Agius Mamo actively participated in MCCAA's Consumer Day Event. SME Chamber CEO delivered a presentation on the impact on SMEs of the new Consumer Legislation. Following this both Ms Mamo and Mr Mizzi set on panel discussions on various consumer related topics.



Apart from this the SME Chamber also participated in the Premju Servizz bi Tbissima activity. SME Chamber Vice President set on the adjudication committee and SME Chamber CEO delivered one of the award categories during the day.



II. Consumer Law Services

The SME Chamber continued servicing members on their client relations needs. This included training as part of the Consumer Law Ready project, helping businesses understand where they stand in conflict situations and also assistance when matters are escalated to the tribunal.



III. Launching the Malta Trade Fair

With the Malta Trade Fair opening its door for the first time following the pandemic, Malta has reached another milestone in terms of normality following the very disruptive Covid patch. The Trade Fair, traditionally, has always had a place in Malta's economic and social calendar. Being able to plan and restore such important milestones in our calendar is a very important step for Malta.

Covid is however no longer the main challenge facing Malta and the economy. Today a number of other challenges have taken their position as top priorities and the SME Chamber is pleased to see a good number of these being addressed by the Malta Trade Fair.



COVID Recovery

Even though the effects of the illness had greatly subsided, the Covid impact was still being felt in 2022 for a number of reasons.

The aftermath of such a tremendous experience had long-term effects understandably and changed life as we know it. Apart from this however, Covid restrictions still in place continued to pace a huge burden on the general population, directly impacting businesses as well.

The Malta Chamber of SMEs made significant pressure to relax and eventually remove restrictions, at par with the developments in other countries. This eventually led to the complete removal of the Covid restrictions, which was quoted in the SME Chamber's Business Performance





survey as one of the main reasons why business improved.

Covid resulted in significant changes, which are dealt with separately in this document. These include change in consumption patterns, digital leap, employment expectations and priorities in life.





Performance still below pre-COVID-19 levels for just under half of businesses, SME Barometer[®] finds

60% of SMEs improved their turnover in 2022 when compared to 2021



BY ARNAS LASYS FEBRUARY 3, 2023

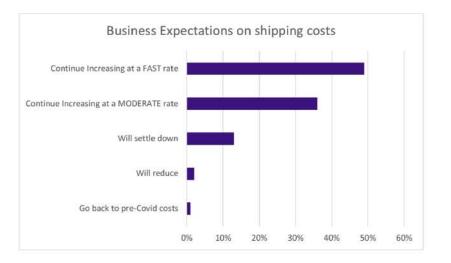


Logistics Crises & Increases in Costs

2022 was characterised with a number of uncertainty when it comes to shipping and logistics. Member continued to experience a rise in shipping and freight costs across the board.

The increases Maltese businesses have experienced have more than doubled the cost of shipping and the cost is not the only factor that was heavily affected. Members report that having no lead time is resulting in very difficult circumstances to manage the business and disruptions in consumer agreement. It is anticipated that the current high prices will take long to go down, if they ever will.

A pre-budget survey conducted by the SME Chamber in August 2022, showed that 48% of members expected shipping and freight costs to increase at a very fast rate, although the SME Chamber received feedback that costs settled down closer to the end of the year



Apart from the increases in costs there are a number of other considerable difficulties businesses encountered when importing. These included:

- Delays and unreliable timeframes this is also a cost to business and creates difficulties in supplying work and participating in tendering.
- Product availability
- Customs and TARIC system bureaucracy, this includes inconsistent and lack of clear approach of customs and their limitations in working hours
- Storage space limitations due to having to stock more also affecting their cashflow

As part of its budgetary proposals, the SME Chamber proposed a number of remedies, some of which were upheld. Particularly the SME Chamber proposed that the Rent Subsidy Scheme should be reformed and capping should increase from Euro 25,000 to Euro 50,000. The aim of this proposal was to help businesses manage their timeframes, costs of products and workflows much better. This proposal was accepted and included in the Governments' budget.

The SME Chamber also proposed export related measures so as to ensure that members exporting good remain competitive, given Malta particular characteristics.

During 2023, the SME Chamber will continue to monitor costs and propose adequate measures to tackle logistical and shipping challenges encountered by its members.

Regulatory Compliance

While coming out of the grey listing was a substantial achievement, this entailed significant regulatory upgrades within a very short timeframe. The upgrades required were a significant learning curve for compliance and regulatory authorities. Post grey listing much fine tuning and updating systems to reduce the compliance needs are required in order to reduce the unnecessary burden that is weighing heavily on businesses.

As part of its pre-Budget meetings, the Malta Chamber of SMEs met Hon. Silvio Schembri, Minister for Economy, EU funds and Lands. The SME Chamber's delegation included President Mr Paul Abela, CEO Ms Abigail Agius Mamo, Deputy President Mr Philip Fenech and Council member Ms Marthese Micallef and Mr Dino Fino.

A number of proposals were discussed in detail with the Minister, one of the topics falling under his remit is the reduction of burdens on businesses, especially those AML related. The SME Chamber emphasised that whilst it understood the need for Malta to come up to speed with regulations, it did feel that Malta could reach its AML.

The SME Chamber called for the implementation of requirements in a smarter manner. This includes the requirements being placed on businesses by the regulators such as the MBR, MFSA and FIAU, the requirements from the local banks, as well as accountancy requirements. Apart from this the SME Chamber also emphasized that whilst the requirements were difficult to comply with, they many times depended on the accountants and auditors and also carried hard headlines and hefty fines. The SME Chamber discussed options on how these burdens can be streamlined.

The Minister on his side said that his ministry was already working on a number of solutions to this end through a centralised system for a number of obligations and also increasing the communication between the main stakeholders in order to streamline their work.



I. Role of professionals

The SME Chamber CEO attended a Malta Institute of Accountants Conference on the role of Small and Medium Practitioners. With increased compliance requirements, the relationship between businesses and their accountants and auditors was becoming more complicated. While quality was not increasing in the eyes of SME's, the cost of the service was dramatically increasing. Navigating the complex world of compliance has resulted into increased frustrations, lack of understanding and mistrust.



II. EU – Russia Sanctions

The Malta Chamber of SMEs in collaboration with Diligex – AML Compliance Specialists and The Sanctions Monitoring Board organised a webinar on the Effects of EU-Russia sanctions on Maltese businesses.

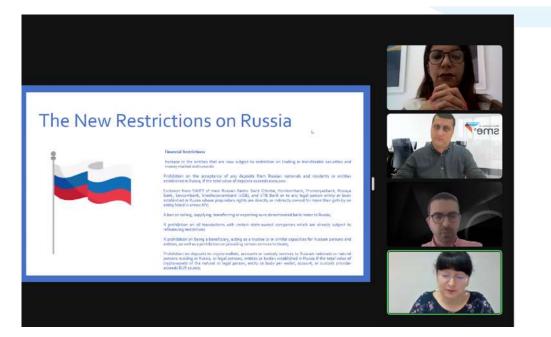
Our speakers explained businesses obligations and practical ways of how businesses should go about this.

The war between Russia and Ukraine has created global uneasiness and disfunction. Maltese businesses have certainly been impacted by the effects of the war, with one of the main direct impacts being the UN- and EU-imposed Sanctions on Russia and the resulting repercussions on EU businesses.

The relevant laws applicable in Malta prohibit ALL companies and individuals from conducting business, directly or indirectly, with any sanctioned persons and/or any of their direct or indirect business interest.

ALL types of business are to evaluate their sanctions obligations in relation to wherever they conduct business. The Sanctions pose substantial obligations on any EU business and heavy repercussions both on the Maltese business itself as well as Malta as an EU country.

The speakers explained the obligations and repercussions in place and explained practical ways of how businesses should go about this. A record of 430 participants registered for this webinar.



Sustainability and pro-environment Initiatives

The Malta Chamber of SMEs leads by example. While it has taken up a number of environmental initiatives for the service of the country it is also a main facilitator to cause change in business in the same direction.

I. Sustainability courses for Small Businesses

The Malta Chamber of SMEs and HSBC Malta Foundation organised a set of webinars entitled Sustainability for Small Businesses. The courses focused on various sectors and were delivered by Dr Roberta Lepre from WEAVE CONSULTING.

The webinars highlighted the opportunities for SMEs pertaining to sustainability with a particular focus on climate change. An explanation was given of how different business sizes and sectors can start their sustainability journey, outlining their first steps.

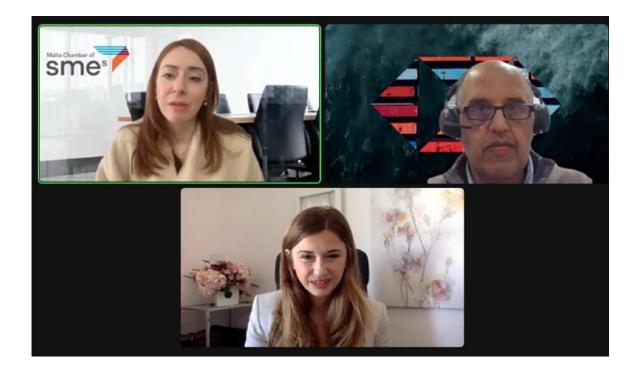
The first three webinars of the series focused on sustainability in general, sustainability in the transport and maritime sectors, and sustainability in the retail, wholesale and hospitality sectors.

The other three webinars elaborated on how sustainability practices can embellish operations in the professional services sector, in the manufacturing and industrial services sectors, and in the financial services sector.

Dr Roberta Lepre, Managing Consultant at Weave Consulting said: "Increasing sustainability practices in corporate operations brings with it various advantages. Beyond being a prerequisite for a better future, sustainability can help businesses in reducing operational costs and gaining access to more innovative technologies. Additionally, business leaders who adopt sustainable approaches will see their corporation's reputation growing, further underpinning commercial success."

Michel Cordina, Executive Director and Head of Business Development at HSBC Malta, said: "HSBC Malta is committed to becoming a net-net zero bank by 2030 so sustainability for us is a strategic imperative. In this context, we are actively supporting the business community through activities such as this seminar series to learn about the advantages of sustainable practices and to begin to adapt their operations accordingly."

Abigail Agius Mamo, Chief Executive Officer of the Chamber of SMEs, said: "Operational sustainability is an indicator of how long a business can maintain its current practices without risking its future resources. Ever so more, sustainability refers to ecological resources; however, the focus must also concentrate on social and economic resources, too, to ensure long-term success in today's challenging corporate landscape."



II. BCRS

The Beverage Container Refund Scheme started its implementation in 2022. Apart from contributing directly towards the milestones of the company itself, the SME Chamber also worked to address the many initial issues that were causing to members. The SME Chamber mainly created opportunities and fora to discuss this challenge and seek to find solutions. An information session was organised in May 2022.

At the close of 2022 the SME Chamber had already ironed out a number of issues, including specific collections for craft beer importers, improved refunds, improvements in the allocation of private vs public RVMs. Work will continue during 2023.



III. Sustainability Forum

SME Chamber Vice President, Michael Galea, participated in a panel discussion during a conference by the Malta Sustainability Forum organised by APS Bank.

The panel discussed the outcome of the survey findings held recently by MISCO for APS bank with the theme "Voluntary Occupational Retirement Pension" bridging the pension gap.

The conference focused on the pension sustainability and adequacy which were held through a broad spectrum of speakers, including the finance minister Mr Clyde Caruana, social partners, employers, unions and other local and foreign experts.

The topics addressed by Mr Galea revolved around the property dynamics, the knock-on effect of the property market on the Maltese economy. The trust that the Maltese people have towards this sector in terms of capital appreciation and return on investment which can serve as a second pension when the owner of the property arrives at retirement age.

The take up of the Voluntary Occupational Retirement Scheme was also addressed and what challenges the market is facing to reach the targets that one expects after seven years from the launch in 2015.

As a way forward it is being recommended that an automatic enrolment pension scheme will replace the existing scheme so as to encourage more people taking on the second pillar pension even from an early stage from when a person gets employed. It is being recommended that this scheme will also have an opt out option.



Human Resources Issues

I. Third Country Nationals (TCNs)

The SME Chamber has in the past year continued its efforts to ensure that the bottlenecks in place with regards to TCNs application process are addressed.

During the past year members encountered a number of issues specifically focused on the lengthy waiting time, when it comes to VISA Interviews and the bottlenecks in place.



Malta Chamber of SMEs 43-45, Kapuććini Street, Floriana FRN 1052, Malta A number of high-level meetings have been organised with different entities, all addressing this issue. During one of these meetings Hon Minister Byron Camilleri reassured the SME Chamber on a restructuring process that would enable the different stakeholders to reach new targets on the engagement of TCNs, that would greatly improve on the experience and how this impacted businesses.



The SME Chamber has managed to build a strong working relationship with Identity Malta during the past year and this reflected positively on the number of members assisted throughout the year. During 2022, the SME Chamber also focused its efforts on acquainting members with the overall process to apply for a single work permit. This included a number of information sessions in collaboration with a number of different entities including Identity Malta and Jobs Plus. The information sessions were mainly focused on attracting and sourcing the right TCNs.



Additionally, the Malta Chamber of SMEs also assisted a number of licensed educational institutions with the student visa application process. This included the extended premium service for student visa applications.

Educational institutions also experienced additional issues related to the courier service, which Identity Malta are working on finding a more reliable solution to address this issue.

During 2023, the Malta Chamber of SMEs, plans to continue tackling issues related to the employment of TCNs, specifically on facilitating the interview and appointment date process, addressing the VISA approval process via embassies.

The SME Chamber also aims to continue building a strong relationship with these entities, continue to organise a number of informative meetings and ensuring a facilitated method of processing of single permits and VISA applications.

II. Work Life Balance Directive

Throughout 2022 the government implemented the work life balance directive within the local legislation. This included a number of new rights for employees which includes the introduction of carers' leave, the new framework for parental leave and the paternity leave.

The SME Chamber has followed the implementation of this directive closely and participated in discussions, given its particular importance for members.

Following discussions with the parliamentary secretary for social dialogue Hon. Dr. Andy Ellul, a fairer compromise was found, that would still ensure the successful implementation of the directive, whilst keeping in mind the realities of employers both from a financial point of view but also from a human resources aspect.

The SME Chamber positively notes that the work-life balance directive was implemented with minimal impact on members. This also included an arrangement with the government to finance the implementation of the directive throughout 2023.

The SME Chamber has also highlighted a number of issues related with the implementation of the directive, particularly on ensuring the fair implementation of the one-time use parental leave allocation.

The SME Chamber is also working on widening the scope of the maternity trust fund in order to be able to cover the additional expenses arising from the new regulations.

During 2023, the Malta Chamber of SMEs also aims to continue to ensure the correct implementation of the directive whilst ensuring the minimal impact on our members.



Chamber of SMEs 'ready to accept' cost of

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III. Skilling and Re-Skilling

The Malta Chamber of SMEs was extensively consulted on the National Employment Policy. This was an initiative undertaken by the Ministry for Finance. The National Employment Policy highlighted the needs for up-skilling and re-skilling of the Maltese workforce. Additionally, it was also highlighted the need for additional employees to maintain the current productivity levels.

Following the launch of the National Employment Policy, the government launched the national census on skills in order to understand better the skills available within local labour market and in the future skills required.

During 2022, the Malta Chamber of SMEs also participated during various conference and seminars specifically focusing on the future skills required and the sectors requiring particular attention.



The SME Chamber also proposed for the government to reinstate proper trade programmes where pupils that do not want to attend standard formal schooling can follow and learn specific trades that would make them industry ready. This would also welcome pupils that have decided on their trade route. Members mention Malta's original trade schools. Inclusion of trade skills should start from the younger years.

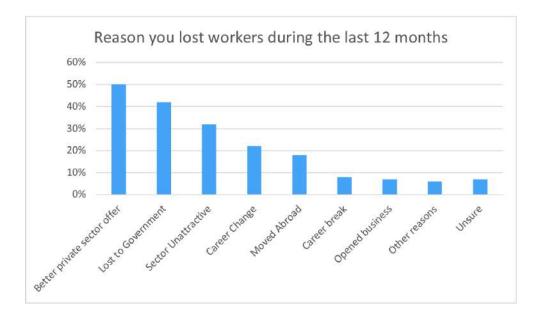
During 2023 the SME Chamber aims to continue following the results of the national skills census and in order to collaborate with the Ministry for Finance on how to best assess the future skills required.



IV. Public Sector Employment

It is no secret that the government is by far the major employer in both Malta & Gozo. Based on the latest statistics full time employment in the public sector in Malta stands at 21%, whilst in Gozo such employment stands at 32%. These percentages do not include workers employed with the community work schemes, who also indirectly work for the public sector. A study conducted by the SME Chamber found out that during the previous 12 months, over 40% of members have lost their employees to government jobs.

The labour market and overall workforce is a huge issue for all the local businesses particularly with the micro businesses who are finding it impossible to recruit employees.



The Malta Chamber of SMEs noted several times that the government is competing directly with the businesses for workers or even worse, head-hunting employees that work with the private sector to move to the public sector.

The Malta Chamber of SMEs has voiced its concern various times, including in the budgetary proposals for 2023 whereby the SME Chamber specifically requested that;

- The Government should agree with social partners on a committed framework that would be transparent and govern employment with the public sector. Additionally, all public sector employees should be held accountable for their work, attend the hours and contribute as required.; and
- To implement an attractive secondment plan with the private sector to increase productivity and incentivise private sector employment.
- V. Mandatory union membership proposal

The Malta Chamber of SMEs, the Malta Employers Association and the Chamber of Commerce called for the immediate withdrawal of the PL's proposal for mandatory union membership.

Spokespersons of the associations addressed a press conference, saying that the mandatory union membership proposal goes against the country's constitutional principles.

CEO of the Malta Chamber of SMEs Abigail Mamo said that the PL's proposal has induced serious worries in small businesses, who are concerned that their positive relations with their employees will change upon implementation of the proposal. Mamo said that there has been no situations or circumstances where the employer's bodies felt the need for a mandatory union membership proposal.



Malta Chamber of SMEs 43-45, Kapuććini Street, Floriana FRN 1052, Malta

BREXIT

During 2022 the Malta Chamber of SMEs continued to closely monitor the impact of BREXIT on its members, specifically those members importing goods from the UK.

As a result of members experienced an added layer of bureaucracy similarly encountered with goods coming from their countries, only to note the strategic and historical ties Malta has with the UK.

During 2022, members continued to experience delays, issues with presenting the requested documentation, issues with groupage containers and delays related to release of goods.

The Malta Chamber of SMEs continued its efforts to streamline the process of goods originating from the UK. The SME Chamber brought together a number of important stakeholders which included; Special Commissioner for Economic, Financial and Trade Relations, The Port Health Directorate and the Customs department to address general issues encountered.

Particularly the SME Chamber put forward a number of proposals which included;

- The Release of Goods – Members should be given the option to have items released and keeping just the items requiring further verification/checks and clearance from Port Health directorate on hold.

- Verification of Good of immaterial value / amount in such instance, members would have the possibility to release the shipment (as a whole) against any form of guarantee (retention of official documentation or monetary amount) deemed fit by the authorities and on the condition that the immaterial items (requiring clearance) are returned to customs until these are cleared accordingly.
- Request for Certification Members are being faced with an added layer of bureaucracy when importing the same items, time and time again. In this regard, they are being asked to submit the same documentation/certificates. The SME Chamber proposed that in cases where the same exact item is being imported (especially those having the same barcode), the department would introduce a system, where the same certificated do not need to be reproduced.
- Ensuring Practicality Although the SME Chamber understands that the UK must still be treated as a Third Country, authorities should ensure that no added processes are introduced.
- Keeping an open line of communication All parties should keep an open line of communication to ensure smooth implementation of procedures. The SME Chamber will keep following the situation with its members, to ensure that any issues are raised and dealt with in the shortest time possible.

During 2023, the Malta Chamber of SMEs aims to keep following this issue closely in order to ensure that members impacted as a result of BREXIT are adequately represented. Additionally, the SME Chamber will also investigate good practices used by other EU countries (e.g., Cyprus), should be investigated in order to be adopted locally.

FUNDS and SCHEMES

Malta Enterprise Schemes

The Malta Chamber of SMEs is a close collaborator with Malta Enterprise on the various support schemes and initiatives in favour of businesses.

- Webinar on Grants for Cost Saving Investments

CEO Mr Kurt Farrugia welcomed all participants during his opening speech, while Ms Nadia Grech, Head, SME Regeneration and Sustainability at Malta Enterprise explained further about the Change to Grow Scheme, the Smart and Sustainable Investment Grant and the Investment Aid for Energy Efficient Projects.



Although all schemes qualify for cost saving investments, the assistance covered varies. During the Webinar, members were provided with case studies, in order to understand better how the above schemes can be successfully applied, thus ensuring more cost saving initiatives for the benefit of their business.

EU Funds for SMEs

For the SME Chamber the topic of EU Funds is always a top priority as it is an important source of financing for its members. The SME Chamber participates in all fora and discussions on this topic and creates its own opportunities to improve on the experience of businesses accessing funding.



SME Chamber CEO Abigail Agius Mamo shared her views on how we can help SMEs become bigger protagonists in EU funding. This was during a panel discussion held as part of an event organizing by the European Commission Representation in Malta.

Ms Agius Mamo emphasized that 'EU funding has come a long way in terms of accessibility but there is always room for improvement. We need to do much more to reach SMEs and understand what their needs are and how we can help them in a separate occasion, the Malta Chamber of SMEs officials led by SME Chamber President Mr Paul Abela met Parliamentary Secretary for EU Fund Dr Chris Bonett.



Mr Abela was accompanied by SME Chamber CEO Ms Abigail Agius Mamo, Head of Policy Mr Andrew Aquilina and Head of EU Affairs and Communications Mr Fabian Demicoli.

During this introductory meeting, the SME Chamber flagged the necessity of EU Funds for SMEs and the importance to simplify access to EU funds.

I. Transport Grants

The Malta Chamber of SMEs earlier organised an online information session on the new schemes for the purchase of Electric Vehicles announced by Transport Malta.

The information session was aimed for businesses intending to purchase new vehicles in the years to come. The new schemes caters for different requirements and subsidise cost for the purchase of EVs. This time round the grants available also cover investment costs for standard M1 vehicles up to the purchase of large passenger vehicles (coaches).

The amount in grant also ranges from Euro 13,000 per M1 vehicles (up to 10 vehicles) up to Euro 250,000 for large passenger vehicles.

Following feedback submitted by the SME Chamber, grants available for the purchase of large fleets, fall under the General Block Exemption Regulation, meaning that businesses who already exhausted their allocated amounts under

the de-minimis regulation (Euro 200K). In this case grants cover the investment cost of the vehicle (the difference in price between an ICE vehicle and an Electric Vehicle) rather than a specified lump sum.

The session was delivered by 2 of Transport Malta top officials, Mr Gilbert Agius, Deputy Chief Officer at Transport Malta and Ing. Ronald Attard Pullicino, Manager, Transport Services at Transport Malta.

Members present were able to direct questions to Transport Malta.

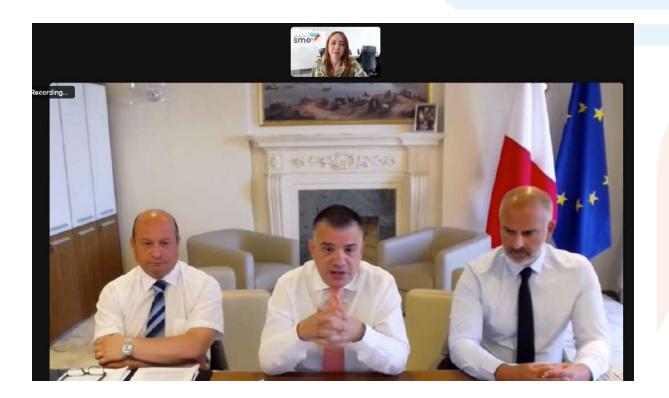


II. Recovery and Resilience Funds

Following the announcement of new EU grants for businesses as part of the EU Recovery and Resilience Funds, the SME Chamber organised a webinar for its members with the participation of Parliamentary Secretary for EU Funds Dr Chris Bonett.

The webinar focused on the 2 latest funding opportunities digitalisation and energy efficient schemes. A total of €35 million of these funds will be used for digitalisation-related projects; with €5 million for SMEs and €10 million for projects tied to the tourism and cultural sectors. Whilst €20 million will be used for schemes promoting more energy efficiency in buildings.

Parliamentary Secretary Hon. Chris Bonett, accompanied by the Director General at the Measures and Support Division Mr Claude Sammut and Mr Chris Magri, explained the schemes to almost 200 participants while they also replied to various questions made by members.



SME Chamber as a Beneficiary

I. Norway Grants

Following the closure of the Norway Grant successful project named, 'Fostering improved working relations for Micro and Small Businesses, the SME Chamber

was awarded a new Norway Grant project named, 'Encouraging better working conditions within SMEs'. The first activity will revolve around a collection of infographics as part of a six-month online campaign. Following the completion of the online campaign, a webinar will be held in order to further increase knowledge and awareness of employment conditions with Employers.

II. Consumer Law Ready

Once again, Via an EU-level project, the SME Chamber embarked on a contract called 'Consumer Law Ready'.

This entailed having a trainer trained at EU level and re-training SMEs and local trainers in order to increase the level of awareness of Consumer law at National level. The SME Chamber hosted 2 trainings for members about consumer law in Malta. Each training participant was accredited by the European Commission. Funds related to this project are based on training carried out. The project was completed in 2022 however following a request by the lead partner Euro Chambres, the European Commission has confirmed the Consumer Law Ready extension until March 31st 2023, without additional budget. This decision was taken to ensure continuity and avoid a project gap as it is expected that the Consumer Law Ready will be renewed throughout 2023.The new project is expected to be under the umbrella of EISMEA.

III. LADDER

The Malta Chamber of SMEs is currently implementing another EU project under the European Social Funds dedicated for social partners. Through this project the SME Chamber aims to upgrade its IT infrastructure in order to be in a better position to assist its members, thus strengthening social dialogue. The total project value is of 124,500. During 2022, the process of implementing the data management system commenced. The implementation of this system required training for the SME staff, which was conducted throughout the year. Also, in 2021, a survey was designed through close collaboration with the CRPD. The survey was about Web Accessibility when it comes to businesses.



IV. CROSSWORKS

Crosswork is a project which forms part of the Interreg Italia-Malta program which the SME Chamber us participating in as a partner.

The project's deliverables are projected to be a provision of 36 vouchers for the activation of internships for young and new graduates, who can either be first job seekers, unemployed, or also disadvantaged young people in MSMEs.



The projected is currently being implemented, with 22 participants started their internship with Maltese businesses across Malta and other 8 participants are expected to start their 6 month internship in the coming days. As a project partner, the SME Chamber was also tasked to issue a call for 6 Maltese candidates interested in a 6 months internship in Sicily, however due to the low unemployment rate in Malta, this proved to be a difficult task. 1 Maltese intern will be departing to Sicily and start the internship in the coming days. The project is expected to end in September 2023.

The aim of this project is for the creation of a highly qualified cross-border network to offer targeted services of cross-border scouting and matching between the supply and demand of labour.

V. IORSME

The SME Chamber was awarded a new project funded by the European commission as a lead partner. The name of this project is Increasing SME Organisations Representativeness for more Effective Social Dialogue (ioreSME).

In 2022, the project officially started. As the lead partners, we organised both a kick-off meeting and also individual meetings on what is expected from each partner. During 2023, each partner, will be disseminating a survey with our members, that was designed in 2022, to understand its role, function and perception towards the organisation and how this can be improved. The study of the survey will be the basis on which a campaign will be based.



VI. ARSME

The SME Chamber, as a partner, submitted an application for a project titled, 'Adapting national social partners' capacities to pursue inclusive and responsive social dialog following crisis situations in EU (ARESME)'.

The main goal of ARESME project is to enhance social partner's performance and negotiation position in social dialogue following crisis situations in EU due to the pandemic. We aim to incorporate informed decisions and learned experiences for a responsive social dialogue.

Key Milestones

General Election 2022

I. Leaders for SMEs

The Malta Chamber of SMEs organised a pre-election meet up for businesses ahead of the General Election, during which the SME Chamber presented its electoral manifesto.

Dr Robert Abela and Dr Bernard Grech were both present to address businesses and communicate their plans for the 5 years to come.



In his opening address, Malta Chamber of SMEs President Mr Paul Abela referred to the height of the pandemic and said that following discussions with the government, the salary supplement was issued which he described as a measure that saved some 100,000 jobs and was the success of everything.

Paul Abela warned that problems would not stop once Malta is off the grey list, he added that once Malta comes of the grey list – a list of jurisdictions under increased monitoring by the Financial Action Task Force – the country would have to start from the beginning.

President Abela also highlighted the problems businesses face while banking. There is increased bureaucracy, the president said, noting how businesses are being asked to fill in forms by a certain date, otherwise the bank would close their accounts.

Referring to the Russian invasion of Ukraine, he said that the country has to consider how it will meet the challenges of energy, gas and grain prices.

Following Mr Abela's speech, Malta Chamber of SMEs CEO Ms Abigail Agius Mamo presented 35 election proposals for the consideration of the political parties.





Ms Agius Mamo presented the election manifest during the Leaders for SMEs event, during which Prime Minister Robert Abela and Opposition Leader Bernard Grech addressed SMEs and replied to questions made by members of the SME Chamber.

Ms Agius Mamo remarked that both the Labour and Nationalist Parties are pledging a reduction in tax for businesses. She appealed that this measure does not discriminate between big companies and the self-employed.

Amongst the SME chamber proposals, the chamber is calling for the removal of excise tax especially on personal hygiene products.

The Chamber of SMEs is proposing that more accountability is needed when awarding direct orders and when dealing with public procurement to ensure a level playing field. It also suggested the setting up of a regulator to oversee public procurement and direct orders.

Picking up on earlier points mentioned regarding banking, Abela said: "Sometimes I feel I am losing my patience with this [banking] sector. Whilst I do understand that the banks have to scrutinize their potential and existing clients and carry out the necessary due diligence checks, there is a lot of 'extra' bureaucracy which I fail to understand."

The PL leader noted that this issue often comes up during meetings with the banks.

Abela noted that the FATF had sent a positive sign, saying that Malta "addressed or largely addressed the action plan at the technical level" and said that they look forward to the onsite visit.

During his speech, Abela also spoke about the Ukraine war, and announced that the first oncology patient would arrive this week. The girl will be treated at the Sir Anthony Mamo Oncology Centre.

"The first girl will be arriving from Ukraine to receive treatment," Abela said, as he thanked Puttinu Cares for their assistance.

Nationalist leader Bernard Grech said businesses fear repercussions. Grech said the Nationalist Party has been consulting with the stakeholders for the past ten years. He remarked that despite frequent meetings, often the party is asked to meet without the media being present.

"Do you want to open the door to your liberty?" Grech asked, questioning businesses whether they would like to continue fearing government backlash if they criticise or voice their disagreement in public.

The Nationalist leader insisted that if the PN is elected to government, everyone would be free to criticise without the need to fear any backlash.



Budget 2023



Photo: DOI - Omar Camilleri

The Malta Chamber of SMEs launched 50 proposals for Budget 2023 during a press conference addressed by SME Chamber President Paul Abela and SME Chamber CEO Ms Abigail Agius Mamo.

The SME Chamber is proposing a tax reform to support SMEs further. The reform would include lowering corporate tax to 15% to incentivise business and increase the balance between local and foreign-owned businesses. The reform will also include the widening of the tax brackets for individuals, which will help lower the pressure related to the cost of living.

Furthermore, the chamber is asking to reduce the VAT percentage. It said that because of the rise in prices, the government can reduce VAT and still make the same amount of money as they were making before. It is also asking for the government to completely eliminate VAT on specific goods or services, such as locally manufactures crafts and works of art.

Through the tax reform, the chamber also wishes to address the 6/7 tax refund disparity. This refers to companies which are in possession of a foreign shareholder or have a holding company in Malta. They benefit from this disparity because they pay up to 30% less tax, the chamber said. Through the tax reform, the chamber would like to address this to have a level playing field.

The proposals also included a focus on taking the yachting industry to the next level. This would involve the recognition of the urgent need for a "fully-fledged yacht marina in Manoel Island, in order to draw more attention to super yachts."

In its reaction to Budget 2022 The Malta Chamber of SMEs welcomed the continued confirmation that the Government will be extending the safety net of protecting Malta from the international hikes of energy prices. This is by far the biggest threat Malta is facing at the moment.

Another positive element found in this Budget is the extension and widening of the Rent Subsidy Scheme, as proposed by the Malta Chamber of SMEs, that will help Malta mitigate the impact of freight costs. Positively noted is the work being done to tackle issues with banking services and the increased importance being given to aesthetics in the development of buildings.



Apart from this the budget was a continuation of the 2022 budget, where it concerns SMEs.

Disappointingly, the Budget failed to effectively tackle other major challenges which are choking businesses. Very serious issues have merely been given a mentioned in this Budget speech, which falls too short from the action that Malta should be taking at the moment, as a stage of implementation.

The serious employment crisis, suffocating bureaucracy and impossible traffic, merited more than simply being mentioned in this budget. These issues are

seriously affecting productivity and we cannot afford to start thinking of policies now, with no solution, nowhere on the horizon.



SME Events

I. Networking

The SME Chamber listen to the wish of its members to make 2022 a year of networking for businesses. After having testing networking models at the end of 2021, 2022 brought about exceptional networking events.

The SME community turned out in droves to the first edition of The Scrum, a networking event organised by Epic for Business and Malta Chamber of SMEs. Conceived and created by Epic, The Scrum is a platform of innovation aimed at SMEs on how to supercharge and be future ready with the best connectivity for their digital transformation. The event was moderated by Malta Chamber of SMEs with contributions from Epic CEO Tamas Banyai and CMO Karl Galea.



The panel, mediated by Malta Chamber of SMEs CEO Abigail Mamo, included Professor Alexiei Dingli, Mr. Cain Grech, representing Malta Enterprise, and Mr. Kenneth Rizzo Naudi from Epic's Business Solutions team.

The event presented an excellent opportunity for SMEs to find out more about the need to create a safe work environment, provide connected experiences, and focus on building more meaningful relationships through personalised communications. During his presentation, Epic CMO Karl Galea demonstrated how smaller firms can use technology to punch above their weight and win the work, presenting findings which yielded some interesting figures. 97% of Malta based enterprises with 10 or more employees rely on Internet connectivity, with speed, reliability, and security the three main concerns for most SMEs. At least 31% of local companies are attacked by cybercriminals at least once a day* and a staggering 1500 cases related to cybercrime are investigated by the Malta Police in just one year**. And finally, the cost of not being online for one day only incurs costs of approximately €1m for Malta's enterprises.

Building on the presentations, those present went on to discuss how to identify gaps and where to prioritize the processes to digitize. Companies can benefit from funds to audit and implement digital transformation in line with schemes such as Change to Grow by Malta Enterprise. Funding for the SMEs to be future ready is also being provided by the EU as part of its commitment to Malta.

"Today, digital readiness is not an option for businesses, it is a need" said Epic CEO Tamas Banyai. "Epic for Business, our dedicated unit for business customers, offers the right connectivity and managed services to ensure that businesses are future ready."

The Scrum event opened the networking events for 2022, while the SME Chamber's Christmas drinks closed them. This is the first year the SME Chamber held its Christmas drinks and these were very well received.



II. Digitalisation

The topic of digitalisation is another priority for the SME Chamber. That is why the SME Chamber was more than pleased to cooperate on the 1st edition of the event FLOW.

Throughout the 1-day conference which was held at Giardini Lambrosa, Rabat, industry experts delivered sessions, who together with a number of panellists provided attendees a wealth of useful information and experience-sharing.

A number of case studies were shared and additionally various demo workstations were available for a hands-on experience.

Malta Chamber of SMEs CEO was one of the speakers opening the event. She said that the SME Chamber leads by example and while we are still at a very early stage in our digitalisation process we have full faith that we have done our first steps correctly. Through the engagement of experienced consultants and the effective use of EU funding the Malta Chamber of SMEs is onto another transportation that will make it future proof.



III. SME Conference 2022

The Malta Chamber of SMEs in collaboration with Business first and Malta Enterprise on Thursday organised the SME Conference 2022 with the main theme being SMEs Maximising resources.

300 participants attended the conference which focused on the main challenges and businesses are facing. This includes boosting productivity and employee retention, sourcing foreign workers of quality, digital investments and achieving sustainability.

Malta Chamber of SMEs President Mr Paul Abela said that now that Covid is something of the past, we encourage SME's to continue to look forward and invest, while working to Maximise their resources in order to combat the current challenges.

Enterprise Minister Hon. Miriam Dalli reiterated the Government's commitment to support companies in their twin transition towards a sustainable and digital business model whilst becoming more competitive. "Budget 2023 will see the doubling of the financial assistance provided to companies by Malta Enterprise, which together with the Family Business Office and Business First will remain a key enabler of growth for our SMEs in the years to come," Minister Dalli said.

Hon. Silvio Schembri, Minister for the Economy, EU Funds and Lands, during his address to small and medium-sized businesses stated that the Government's

assistance to businesses is helping to operate smoothly and further scaling up their operations.

Among the measures, he mentioned the recovery plan where businesses can apply for funds to further improve their operation, both in digital and energyefficient terms.

The SME Conference is well renowned for its organised networking sessions and participants had the opportunity to network with fellow business people from different sectors.



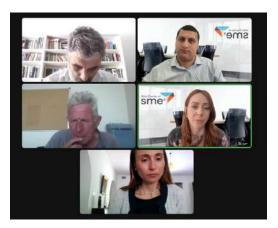


IV. Various webinars

Numerous webinars were organised in 2022. The blow is one example:

- eTranslation services for SMEs

The Malta Chamber of SMEs and the European Language Resource Coordination (ELRC) organised an information session about a free eTranslation service being offered for SMEs.



The information session was presented by Dr Donatienne Spiteri, from the ELRC National Anchor Point (Malta) and Mr Mark Vella – DG Translation Language Officer at European Commission Representation in Malta.

eTranslation is provided by the European Commission, is a state-of-the-art online machine translation service. The eTranslation service is free of charge and will help you save time and money to translate your documents and text between any two official EU languages, and more! eTranslation guarantees the confidentiality and security of all your translated data.

During this information session, the speakers spoke about the advantage using this service and explained how SMEs can use it.

Awards

I. National Supporting Business Awards 2022 Winner in 1st place

The Malta Chamber of SMEs has once again won first prize at the National Supporting Business Awards under the remit of the Ministry for the Economy.

The Award was won on the basis of supporting businesses in their sustainable transition and support environmental aspects such as the circular economy, climate neutrality, clean energy and resource efficiency. The SME Chambers' project is called 'A Fair Deal for Maltese Businesses'.

The Green Deal, which was first announced in December 2019, came with a very innovative concept. The European Commission (EC) immediately stated that the Green Deal is very ambitious and will require a big change in the private sector. Yet, The EC also said that this transition would be a fair and just one and that it will ask the Member States to ensure that nobody is left behind. The SME Chamber has risen to this great challenge and has taken it upon itself to ensure that, with the collaboration of many stakeholders, Malta would not just be on the forefront of the Green Deal but would also champion the theme and impact of having a just and fair transition.

By engaging and collaborating with different stakeholders the SME Chamber is aiding in the implementation of new EU targets and requirements from a small business perspective and ensuring that these small businesses are at the heart of every strategy related to the green deal.

The Malta Chamber of SMEs takes this opportunity to thank its collaborators in this project, mainly, the Ministry for Energy, Environment and Enterprise, Malta Enterprise, the Energy and Water Agency, the Water Service Corporation, CE Malta and the Ministry for the Economy and EU Funds.



II. Malta Business Awards

The Malta Business Awards were organized by the Malta Chamber of SMEs in partnership with Malta Enterprise to recognize the work of Maltese businesses, honouring some of the best businesses in various prestigious categories including the SME of the Year, Local Cultural Contributor, Gozo Business of the Year and the highest honour, the President's Choice Award.

With over 300 nominations in the different categories presented, 100 finalists were chosen by independent judges during the first round, with the winners being chosen after a second round of judging following pitches put forward by the finalists. The event was attended by over 550 people representing local businesses and major stakeholders in the industry.

The Minister for the Environment, Enterprise and Energy, Hon. Miriam Dalli said: "The first edition of the Malta Business Awards served as a showcase of our nation's leading entrepreneurs and businesses, who despite the ongoing challenges still strive to produce and deliver excellent products and services. I look forward to seeing more businesses adopt innovative and sustainable solutions, giving their operations a competitive edge.

Paul Abela, President of the Malta Chamber of SMEs highlighted the fact that Maltese businesses had been waiting for an evening like this for a very long time and that it has now finally arrived.



Malta Chamber of SMEs CEO, Abigail Agius Mamo said that it was a great honour that together with Malta Enterprise such awards were created in order to recognize Maltese business.

Enterprise CEO, Kurt Malta Farrugia said: "Our country has a strong and resilient business community and our mission as Malta Enterprise is to see that business is further Maltese that strengthened and it regenerates itself to be stronger in its future endeavours. Our schemes are designed to support businesses in their path towards growth. Tonight's awards are a celebration of all the good that Maltese and Gozitan businesses and workers have to offer."



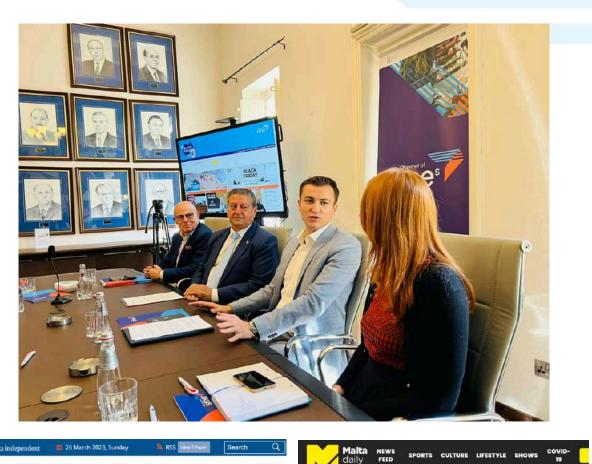
Black Friday & Festivities 2022

The Malta Chamber of SMEs launched its Black Friday campaign a month in advance of Black Friday itself. For this year's edition, the SME Chamber launch a new website, www.blackfridaymalta.eu, a website to promote businesses Black Friday offers but also provides an easy tool for customers to search for offers.

This initiative was launch during a press conference addressed by the Minister for the Economy, European Funds and Lands Silvio Schembri. Minister Schembri said that this initiative provides a new tool for businesses and customers which makes Black Friday a more successful initiative.

Paul Abela, President of the SME Chamber, said that Black Friday makes November a very important month for businesses. He encouraged more traders to offer offers on the new website.

Abigail Mamo, CEO of the Malta s Chamber, said that customers will have the opportunity to search for offers either by category and sector or by the offer percentage, with available offers up to 70%, Ms Agius Mamo explained that businesses may include their offers by creating an account.



🕕 malta independent 26 March 2023, Sunday Q

R LOCAL WORLD DEBATE SPORTS BUSINESS ARTS LIFE VIDEOS NEWSPAPER MAGAZINES

Black Friday sales expected to reach pre-pandemic levels - Chamber of **SMEs**



SME Chamber kicks off platform to promote local Black Friday deals

SPORTS CULTURE LIFESTYLE SHOWS



Malta Chamber of SMEs 43-45, Kapuććini Street, Floriana FRN 1052, Malta Black Friday marks the run up to the festive season, a very important quarter for most businesses. The SME Chamber today works to support members its during this important part of the year by encouraging clients to support local businesses. On a yearly basis the SME Chamber participates in highlighting Valletta during the festive season.





Surveys

Business Performance Survey 2021

Published in January 2022, the study conducted by the Malta Chamber of SMEs among 250 business owners showed that 44% of SMEs in Malta expected their business to fare better this year.

The survey was carried out between the 10th and 27th of January amongst business owners. 17% replied that 2022 will be worse than 2021 while 39% replied that 2022 will be the same as 2021.

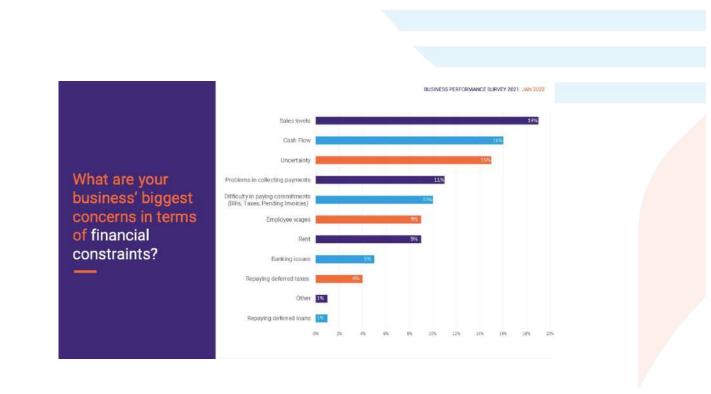
Asked about their biggest concerns for the year, businesses said they were seriously concerned about the increases in costs, the prolonged uncertainty due to the COVID-19 pandemic as well as the uncertainty created by the impending general election.

In terms of financial constraints, businesses biggest concerns were sales levels, cash flow, problems with collecting payments, employee wages, banking issues and repaying deferred taxes.

Several businesses reported that they have suffered a difficulty in performance due to quarantine rules, as 13% reported that 30% or more of their employees were out at one go due to quarantine.

38% of the respondents remained neutral on whether they were satisfied with the overall business sales in the first few weeks of 2022. 20% and 15% responded being dissatisfied and very dissatisfied respectively. Despite this, an overwhelming 44% of the respondents believe that 2022 will have better results than 2021, factoring in better control of the pandemic and increased consumer confidence.





Driving the SME Chamber Forward

I. Digitalisation

The Malta Chamber of SMEs has embarked on a digital transformation journey in order to upgrade its internal processes. The digital transformation process is being done as part of an ESF funded Project – 'Leading and Delivering Dialogue Effectively, Representatively (LADDER)'.

This involves upgrading the member management system and integrating all processes such as event registration and survey dissemination. This also included the implementation of a data management system and a payment gateway implemented in collaboration with Trust Payments. The transformation will lead to a more efficient process thus leading to a better service and experience for members.

Throughout 2022, employees have received training on the new system in order to familiarise themselves with the new system.



Malta Chamber of SMEs 43-45, Kapuććini Street, Floriana FRN 1052, Malta During 2023, the SME Chamber plans to officially roll-out the new system, including its new membership invoicing and renewal service.

II. Service Development

During 2022, the Malta Chamber of SMEs continued to enhance and adapt its service to members. From time to time, the SME Chamber requests feedback on how the SME Chamber can improve on its services, thus offering a better product to its members.

The SME Chamber has throughout 2022, focused on offering members a better networking platform through the various networking events organised. Members attending the various physical events where able offered the possibility to effectively network with peers through organised networking breaks.

During 2022, the SME Chamber also revived the FREE legal Advice offered to members previously. Through a joint collaboration with Gonzi & Associates, member could enjoy the initial legal advice on different matters, which include employment related issues, family business, consumer law issues and commercial issues. Members seeking advice where able to receive an unbiased, commitment free opinion. The Malta Chamber of SMEs looks forward to continue to build on this collaboration for the benefit of its members. Based on the feedback received, the SME Chamber, in collaboration with MCAST, also focused in offering apprenticeship opportunities for students following courses at MCAST. Apart from offering, such opportunities, the SME Chamber also ensured that members interested are offered the respective training on how apprenticeships work and the benefits in place.

Finally, the SME Chamber also focused on offering more exposure opportunities to members through the organisation of the first addition of the Malta Business Awards and the launching of a dedicated portal for Black Friday, for members to exhibit their products and offers free of charge.

III. Human Resources

During 2022 the SME Chamber has engaged a new staff member thanks to the funding obtained under a new funding project. This resource today forms an integral part of the SME Chamber's employee complement and will focus on tapping and acquiring more funding in favour of the SME Chamber and its members.



Sectors in Focus

Tourism, Hospitality and Leisure

2022 was a year filled with challenges, especially in the first quarter (January, February, and March) when Covid restrictions forced many businesses to close. Despite these difficulties, companies remained resilient and used this time to prepare for when restrictions were lifted and the season began.

Their preparations paid off in April when

tourism floodgates opened and the industry quickly resumed operations. With better refurbished establishments, renewed energy, and enthusiasm, the industry was able to attract tourists steadily throughout the year.

By the end of 2022, the industry had broken all records and projections, with 2.3 million tourists visiting the island. Although the industry was operating at 83% of its airline linkages, spend per capita was even better than before.

'There will be blood,' Chamber of SMEs deputy president says on MHRA's 4.7 million tourists study

LOCAL WORLD DEBATE SPORTS BUSINESS ARTS LIFE VIDEOS NEWSPAPER MAGAZINE

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However, the industry faced a major challenge due to the numerous new tourismrelated construction projects. While these will ultimately take the product up several notches, they also cause disruptions in certain pockets of our Tourism Zones. The SME's Chamber has appealed to the Malta Developers Association to ensure good practices and hoarding around construction sites to minimize any collateral damage.

Despite these challenges, the forecast for the next four years is exciting, with the industry seeing the launch of high-quality hotels, beds, restaurants, clubs, and retail.

In fact, the forecast for 2023 is very strong, and it could be the year that takes us back to pre-pandemic levels and even reach the record figures of 2019.



Transport and Logistics

During 2022 the Malta Chamber of SMEs, continued its representation on a number of areas related to the transport and logistical sector. This included different aspects and different stakeholders.

Following the announcement of the new Transport Minister, the SME Chamber set up a meeting inviting representative stemming from all different transport related sectors represented by the SME Chamber. These included:

- Chauffeur-driven
- Car Rental and Leasing
- Goods Distributors (supply chain)
- Pleasure Boat Operators
- Jeep Tour Operators
- Vintage Vehicles (Y-Plates)
- Ship Agents
- VRT Operators
- Large Passenger Transport
- New Car importers
- Second hand Car Importers
- Maritime Pilots

• Cargo Hauliers

Minister Aaron Farrugia was introduced to a number of different issues encountered by members. The SME Chamber later followed up with a paper, highlighting all issues encountered.

Throughout the year SME Chamber officials continued to follow up on the individual issues through separate meeting and efforts.



Malta Chamber of SMEs 43-45, Kapuććini Street, Floriana FRN 1052, Malta I. Transport Malta Traffic Control Committee

Through its participation in the Monthly Traffic Control Committee organised by Transport Malta, the Malta Chamber of SMEs continued to represent the interest of its Members. As part of the Traffic Control Committee the SME Chamber also raised a number of issues on behalf of members or groups. The monthly meeting includes all relevant stakeholders including LESA, TM, Malta Police Force, Infrastructure Malta and the Local Council Association.

Particularly issues directly raised, related to the Works in Mosta, the various boarding and alighting / Loading and Un-loading issues and road closures.

II. Individual / Collective Issues

The SME Chamber assisted members on issues related to Un-fair contraventions, Loading and Un-loading Bays and issues with road works.

Additionally, members assisted members operating withing the Malta International Airport with discussion of a new tariff structure announced by MIA.

Following the announcement of this new structure, the SME Chamber met with MIA and requested a complete haul on its implementation to ensure that the adequate consultation takes place prior to its introduction.

The MIA have since halted the implementation of the new measure pending further discussions.

During 2023, the SME Chamber will continue to discuss with MIA the fair introduction and implementation of new tariff structure.

III. Supply Chain / Food Distributors

The SME Chamber together with its members representing distributors compiled a list of areas that require specific attention on issues encountered with loading and un-loading bays.

The idea is to present a bulk list of recommended areas that require attention to Transport Malta, reflecting the main sore points in place. The SME Chamber is also working with LESA to ensure practicality wherever possible.

The SME Chamber held meetings with the LESA to highlight the issues encountered by members, particularly related to enforcement of loading and unloading bays.

During 2023, the SME Chamber plans to continue following these issues, directly with TM to approach this holistically.

IV. Car Rental & Leasing

Members operating within the Car Rental and Leasing Market. The current grant schemes issued for the purchase of EVs. Namely: since the grant for those opting to make use of the grant under the De Minimis regulation (less than 10 vehicles) is of Euro 11,000 and those opting to make use of the GBER (more than 10 vehicles) are qualifying for a smaller grant is creating an imbalance.

The SME Chamber continued its efforts on this and also held meeting with Malta Enterprise and the Ministry for Environment, Enterprise and Energy, to voice its concern and also to propose mitigating measures to address these concerns.

Unfortunately to date, the issue persists and the sector is still facing these issues. The SME Chamber plans to continue following this issue closely until a workable solution is found.

V. Chauffeur-Driven Services Sector

The main issue this industry dealt with is the lack of human resources and the bureaucratic delays in employing individuals who are willing to work. To make matters worse, non-EU driving licenses issued to third-country nationals have a 12-month validity period.

A person must stop working and wait for the process to retest, re-license, and retag. Members noted that this is extremely disruptive to their operations. Another issue we dealt with is the goal of transitioning to an EV fleet. The new EV investment schemes, particularly for businesses looking to invest in more than ten vehicles, are discriminatory when compared to the incentives available below this threshold (Less than 10 vehicles – 11K under De Minimis and More than 10 vehicles falling under GBER – standard less than 11K per vehicle).

VI. Large Passenger Transport

The SME Chamber assisted members within the Large Passenger transport particularly on the logistics and route planning aspect. Members within the industry are being faced with inadequate actions when it comes to enforcement. This particularly relates with issues encountered with Short interval trips, whereby drivers are being penalised unfairly.

The SME Chamber proposed a change in legislation which specifically states that Large Passenger vehicles may be parked in an appropriate area which is not within twenty meters from any side of a building, whether inhabited or otherwise or any other structure of historical or cultural value.

The SME Chamber also assisted members with drop-off points, particularly in tourist intensive areas.

VII. Jeep Tours

The SME Chamber assisted members operating within the Jeep Tours sector on a 2-year deadline set by TM by when they are to seize using their current vehicles and instead opt for a more environmentally friendly vehicle.

Although members are in favour of upgrading their operation, with the pandemic COVID stalled the manufacturing of such vehicles (which in their majority are cars created specifically for the Maltese Market, operators would have had to stop offering Jeep tours at all.

Given the above circumstances, and in light that the deadline was due, the SME Chamber assisted members with requesting a 2-year extension to ensure the vehicles are made available and that no work is lost.

The extension was subsequently approved by TM and members were allowed to operate.

VIII. Vintage Vehicles

Members operating within this sector are faced with exorbitant license fees to keep vintage vehicles (which in their absolute majority are only used as wedding vehicles) on the road. The licence fees are normally around Euro 1,125.00 per annum These vehicles are normally very well maintained, are part of Malta's history and patronage.

These vehicles are well over 30 years of age and go up to 100+ years. Unfortunately, some members are opting to garage a number of these vehicles given the running costs in place vis a vis their occupancy rate.

The Malta Chamber of SMEs proposed that TM create a special category for these vehicles, similar to other special categories created from time to time.

During 2023, the SME Chamber will continue to follow this issue.

IX. VRT

The SME Chamber continued to represent members operating VRT Stations. The SME Chamber organised a number of meetings, both with the VRT stations committee, but also for members in general.

Members operating VRT Stations, faced issues with finding adequate personnel to employ. The issue stems from the fact that currently there are no courses being offered for VRT technicians, while the course offered by MCAST (for mechanics) is not being certified by TM.

The SME Chamber also held information sessions to update members on new regulations and directives coming into force shortly.

The section also held its general meeting where a number of important topics were discussed including upgrades required by an EU Directive, the viability of the sector, increasing the levels of proficiency and difficulties with Human Resources.

The SME Chamber was represented by its CEO Ms Abigail Agius Mamo and Ms Liz Said and VRT sector was represented by Mr Michael Buhagiar and Mr Daniel Cutajar.



X. Hauliers

During 2022, the SME Chamber, continued representing members operating within the Cargo Haulier and Customs Clearance Service.

The Malta Chamber of SMEs held a number of meetings with the Malta Freeport Corporation, the Malta Freeport Terminals Ltd and the Malta Customs to ensure that issues encountered by members, particularly with regards to freeport operations.

The SME Chamber in collaboration with the Malta Freeport Terminals Ltd conducted a Health & Safety Risk Assessment, to understand better the Health and Safety risks involved in their operation. Following this, the SME Chamber was also consulted on the mitigating measures and changes required.

An educational campaign was rolled out with members including an explanatory video explaining the work procedure.



The SME Chamber also worked on putting forward a number of proposals that would ensure a fairer disciplinary procedure when tackling reports.

The SME Chamber also assisted members with ensuring the minimum downtime in operations. This included liaising with relevant stakeholder to ensure that the operation time continues or is compensated whenever there is a downtime.

During 2023, the Malta Chamber of SMEs will continue to work on the daily issues encountered and also to establish a fair disciplinary procedure for members operating in the Malta Freeport Terminal.

XI. Foundation for Transport

The Malta Chamber of SMEs, continued its work within the Foundation for Transport, particularly focusing its efforts on ensuring adequate infrastructure to transition into the EV industry. This includes, ensuring adequate skills, supply and human resources.



Through the Foundation for Transport, the SME Chamber also studied the feasibility of Hydrogen powered vehicles.

During 2023, the SME Chamber aims to continue collaborating and supporting the work of the foundation for Transport as one of its founding members.

XII. Fuel Stations

Fuel Stations worked together as a group in order to continue advancing on a number of issues. A number of stations still had works ongoing for the refurbishment project, issues with Enemed continued to be discussed as these still persisted, issues related to the supply chain and matters concerning car washing services.

A consultation meeting was also organised in relation to the Energy Taxation Directive. The Energy Taxation Directive (2003/96/EC) — commonly known as the ETD — is the European Union's framework for the taxation of energy products including electricity, motor and most heating fuels.



Malta Chamber of SMEs 43-45, Kapuććini Street, Floriana FRN 1052, Malta

Renewable Energy Sector

During 2022, the Malta Chamber of SMEs has submitted Ministry for Energy Enterprise and the Environment, the SME Chamber has held a number of meetings both with the renewable energy sector and also with the Ministry for Energy, Enterprise and the Environment, in order to understand the difficulties and challenges in place when it comes to renewable energy, particularly on the issues revolving around calls, which are in general holding them back from applying and investing in the renewable energy sector.

The issues highlighted specifically focused on;

- Issues with the Grid Connection Members noted that one of the main issues when applying for the project is the Grid Connection. More often than not, a project is not feasible because the grid connection costs are too high. As a recommendation, the SME Chamber proposed a pro-rata cost based on KW Allocation.
- Planning Permits Members argued that in some cases, it is not always possible to get a full planning permit which currently needs to be submitted with the intention to bid. The SME Chamber recommended a change in the documentation requested. Instead of requesting the full permit, a guarantee should be issued in order to ensure commitment without shooting down prospective projects.

- One-Stop-Shop The SME Chamber recommended a one stop shop for such large projects, whereby applicants can deal with one entity handling all the process. This could be possibly implemented through Business 1st, a subsidiary company of the SME Chamber.
- Change in Specs / Price Addressing and adapting to economic realities Given that the Renewable Energy industry has been severely affected by global disruption in logistics supply chains, skyrocketing costs of components, freight and global shortage of primary materials, the SME Chamber recommended that applications can be altered by an amendment form in order to facilitate the application process.

Moreover, the SME Chamber also put forward a number of new grants specifically focused on both commercial and domestic entities. These included;

- Commercial energy storage schemes The Current domestic battery scheme is a resounding success. A similar scheme is being recommended to incentivise businesses to invest in energy storage, including in microgrids. Such schemes should cater for all levels, from energy storage for small businesses like kiosks or retail outlets, to larger industrial installations.
- Grants for investment in energy efficient projects (Domestic & other than PVs, Heat pumps & SWH) Similar to grants available for commercial

properties for the retrofitting of energy efficient solutions (such as; intelligent lighting, heating and cooling solutions etc), it was recommended that similar grants are introduced for residential properties in order to ensure sustainability and reduction in energy consumption.

During 2023, the Malta Chamber of SMEs remains committed to see this sector grow. Additionally, the SME Chamber will continue to follow issues closely in order to ensure a smooth transition towards a greener energy sector.

Licensed Education Institutions

The Malta Chamber of SMEs during 2022 continued its efforts to establish and adequate platform for licensed educational institutions to be fully represented.

The Malta Chamber of SMEs, in representation of a number of sectors directly dependent and affected by the Ministry for Education. During 2022 the Ministry has been marred by a lot of turbulence and this has made work and collaboration extremely difficult, with energy and initiative not achieving the desired results.

During the year, licensed educational institutions committee held a number of introductory meetings particularly following the announcement of the new Minister for Education Hon. Clint Camilleri and the appointment of the new Permanent Secretary Mr. Matthew Vella.



I. MFHEA Advisory Committee

As a result of the efforts made during the previous year, has managed to secure a permanent position within the newly formed Advisory Committee within the Malta Further and Higher Educational Authority.

The Malta Chamber of SMEs together with two other representatives of private educational institutions (Ms. Ilaria Spiteri Axiak – MISCO and Mr. Charlo' Bonnici – Learning Works) and other stakeholders is tasked with providing advice to the Authority on matters impacting licensed providers and students.

As part of its work representing licensed service providers, and together with the two other representatives has conducted a survey amongst all licenced service providers in order to assess the state of play and also to understand better the priority areas requiring attention with regards to the Authority. To date, the SME Chamber has manged to improve drastically the communication channel with the Authority, through its representation in this committee.

During 2023 the SME Chamber aims to continue representing members' interest to the best of its ability, through its representation on this committee.

II. Student VISAS

The Malta Chamber of SMEs, continued its efforts to ensure that educational institutions are not faced with additional delays when accepting students from third countries.

Unfortunately, throughout 2022, members sourcing Student TCNs from Asian countries such as India and Nepal, continued to face issues and excessive delays in the processing of applications. The Malta Chamber of SMEs together in

discussions with Identity Malta has managed to extend the premium VISA service for students coming from India. The premium visa service expedites the process for students. The service, to date is however only offered for student applications deriving from India. The service although more efficient, proved some issues particularly with the courier service provider

During 2023, the SME Chamber aims to continue its discussions with the relevant authorities to identify a more efficient and smooth process for licenced education institutions to enrol TCN students.

MARITIME

I. Ship Agents

The Malta Chamber of SMEs continued to represent a number of Ship Agents which in their absolute majority are micro companies or self-employed.

The SME Chamber represented their interests and concerns in light of TM efforts to legislate the industry.

The SME Chamber notes that a number of positive improvements have been made and is in discussion with TM to discuss the other provisions that concern ship agents, particularly those having a small operation.

During 2022, the SME Chamber and its members, participated in an SME Test study to understand the impact of the proposed measure on SMEs.

The SME Chamber aims to continue discussions with tithe relevant authorities during 2023.

II. Super-Yacht Steering Committee

The SME Chamber was involved in the Superyacht Steering Committee set up by the Transport Ministry in order to understand better the potential involved in this industry and propose measure on how this sector can flourish.

The SME Chamber was requested to nominate two representatives to work on this committee, tasked with identifying the main challenges in place and to recommend changes aimed at improving the Superyacht industry. Mr. Christopher Curmi (Elon Marine) and Mr. Andrew Aquilina (Head of Policy, SME Chamber) actively participated in this committee and also ensured that members operating within this sector are consulted effectively. As part of its task, the SME Chamber lead the RE-Fits, Technical and Infrastructure aspect of this policy in light that the majority of its members operate within this field.



The consultation involved the direct consultation with the super yacht committee within the SME Chamber and also the organisation of a number of Focus Groups with members.

Following this, the SME Chamber drafted and presented a paper, highlighting the Strengths, Weaknesses, Opportunities and Threats revolving around this important niche.



During 2023, the SME Chamber looks forward to see the publication of a white paper, which will include the proposals stemming out this consultation. Following the publication, the SME Chamber aims to continue following this sector closely to ensure adequate representation of all stakeholders involved.

National Lottery Agents

The work with lotto agents mainly focused on addressing operational issues as well discussions related to the preparation in what resulted in a changeover in the main operator of the concession.

Discussions resulted in the conclusion of an agency agreement that will regulate the business relationship between the parties for the next 10 years. This was announced publicly in a joint statement by the National Lottery plc a subsidiary of the IZI Group and the new operator of the National Lottery of Malta as from July 5th, 2022.

The process at reaching this milestone commenced in late 2021 when the representatives of the national lottery agents, the Lotto Receivers Union (LRU) and the Gaming & Lotteries Agents Association (GLAA) had both endorsed the bid submitted by National Lottery plc for the Request for Proposals (RFP) process through a Memorandum of Understanding (MOU).

Over a number of months, since being declared as preferred bidder, National Lottery plc, the LRU, GLAA and Malta Chamber of SMEs entered discussions with the aim of concluding an agency agreement for the duration of the concession term, aimed at strengthening the relationship between the parties.



Temping and Recruitment Agencies and Platform Work

The world of work has changed dramatically over the last years.

The phenomenon of online platforms is an economic development that has many positives. It is however a recent development and regulations still need to align to this reality in order to clarify any grey areas and curtail abuse. Mainly, the responsibility of fair working practices and observance of the law cannot simply rest with the employer but also the platforms dictating conditions. Currently the law specifies that temping agencies are regulated by separate license. Having said this, there is a mix in how these are handled. Sometimes temping agencies are asked to apply for a recruitment agency license or no license at all. There are ample temping agencies operating as a normal business, dealing in the employment of persons without any kind of license.

It is essential to distinguish between the operation of temping and recruitment agencies and each operation would require a separate license. It is also important to recognise not just the different operations but also the distinctive responsibility these carry. Whilst recognising the essential economic function that temping agencies have today it is also equally pertinent to note that the sector is currently functioning in an unhealthy manner and bona fide agencies are suffering at the expense of the multiple cowboys entering the market. Apart from this. Malta is also suffering greatly from the horrible and real human stories that are surfacing in the public domain. These put us all to shame.

Regulators need to ensure that the market remains but it must be a healthy one.

The SME Chamber has been working alongside representatives in order to see that the laws are upgraded to be able to cater for these new forms of work.



Childcare Centres

2022 was a very busy year for childcare centre representatives since the new agreement was being negotiated. This agreement was closed successfully following lengthy discussions, to the satisfaction of the centres. The year closed with another set of very important discussions started on the substantial increase in COLA.

High-Level Meetings

Meeting with Prime Minister

The Executive Council of the Malta Chamber of SMEs, held a meeting with Prime Minister Hon. Robert Abela and discussed several issues that SMEs faced, including concerns on energy prices, rising shipping costs and human resource shortage.

During the meeting, Prime Minister announced the extension of the Wage Supplement till the end of February 2022 and the continued for support SMEs

The meeting also focused on the governments' efforts to cut through bureaucracy to help businesses through the different support mechanisms and schemes.

Council members were able to raise concerns and proposals to ensure the recovery of Maltese businesses post covid.



European Parliament President

During 2022, the Malta Chamber of SMEs welcomed European Parliament President Roberta Metsola at its offices in Floriana. During this meeting, the SME Chamber discussed several issues effecting Maltese SMEs, such as employee shortage and shipping costs. Both sides discussed also the energy crisis, currently effecting most European countries. President Metsola pledged to continue supporting Maltese SMEs in the European Parliament and other European fora.

Following the Meeting, the SME Chamber presented a written brief highlighting the main issues encountered, including sector specific issues raised during the meeting.

The SME Chamber was represented by President Mr Paul Abela, Deputy President Philip Fenech, Vice-President Noel Gauci, CEO Ms Abigail Agius Mamo, Head of Policy Mr Andrew Aquilina, Head of Communications Mr Fabian Demicoli and Jamie Tanti.



Parliamentary Secretary for Social Dialogue

Malta Chamber of SMEs CEO Ms Abigail Agius Mamo and Head of EU Affairs and Communications Mr Fabian Demicoli met Parliamentary Secretary for Social Dialogue within the Office of the Prime Minister Dr Andy Ellul for an introductory meeting.

During this introductory meeting Ms Agius Mamo mentioned the importance of Social Dialogue and highlighted the key issues for SMEs.



Photo - DOI - Jeremy Wonnacott

Amongst the topics discussed was the role of MCESD, the changing dynamic of the workplace and the impact of EU Directives. This included a special focus on the work-life balance directive and how social dialogue can be further strengthened and enhanced.

European Economic and Social Committee President

As part of a business breakfast organised by MCESD, the Chairperson Mr James Pearsall in his introductory speech, said that MCESD has strived hard during the years to forge the joint effort of unions, employers and the government so to have a solid base on social dialogue.

EESC President Christa Schweng, stressed the link between MCESD and its European counterpart, the EESC. Ms. Schweng spoke about the importance of the committee network which allows the sharing of best practices among members and allows for expressing different perspectives ensuring a rich debate.

SME Chamber President, Mr. Paul Abela, highlighted the importance of cooperation between the EESC and the National ESCs across the European members and the intention to launch an online space to enable the exchanges of ideas. It is felt that this initiative is of strategic importance to enable this network to discuss common interests and strengthen cooperation.

The meeting was also attended by Parliamentary Secretary for Social Dialogue Hon. Andy Ellul who maintained that Social Dialogue is crucial, especially during the current times.



Meeting for Mediterranean Countries

Malta Chamber of SMEs President Paul Abela participated in the CNA general Assembly held in Taormina. During the Assembly discussions focused on the issues encountered, particularly the rising energy prices across the EU.

The General Assembly was also attended by SME United President, Petri Salminen and Director General, Veronique Willems.



Consul for Liechtenstein in Malta

In February, Malta Chamber of SMEs Vice-President, International Relations Mr Chris Vassallo met Dr. Peter Krenn, Hon Consul for Liechtenstein to discuss potential new avenues of cooperation between Malta and Liechtenstein.

Mr Vassallo stated that like Malta, Liechtenstein is a small country. There are important synergies and opportunities that can be explored.



New Commissioner for Revenue

The Malta Chamber of SMEs welcomed Mr Joe Caruana and his team, the new Commissioner for Revenue, to an official meeting with our Council.

During the meeting, the Commissioner talked about leading the Department through a journey of transformation. The Department will teach and enforce policies to assist taxpayers in being compliant. However, it is important to understand that taxpayers must also show respect, and tax avoidance and underhanded failures will not be accepted.



The SME Chamber was happy to meet with the Commissioner and believed that an open dialogue was a positive first step. The SME Chamber did not support dishonest behaviour in tax compliance but thought that some flexibility and understanding of different circumstances was necessary to avoid making the situation worse. The goal was to get businesses back on board as quickly as possible.

In the past, it was pointed out that there were certain situations where the work of CFR needed to be given more importance, and ways to make things better were discussed. It was emphasized that treating everyone fairly and equally when applying rules and making decisions is extremely important.

Tunisian Ambassador to Malta

The Tunisian Ambassador to Malta, H.E. Yassine El Oued, and his First Secretary, Mr. Mohamed Wael Khammassi, visited the SME Chamber office in Floriana. They met with President Mr. Paul Abela and Council Member Mr. Mario DeBono. They talked about the success of the recent online business forum that was organized between the Malta Chamber of SMEs and the Tunisian Chamber. The Tunisian Embassy in Malta helped with the collaboration. Mr. Paul Abela said that they would have more collaborations between the Tunisian Embassy in Malta and the Malta Chamber of SMEs. They want to create business for both countries.



Meeting members of the Opposition

On many occasions in the past, the SME Chamber had meetings with various opposition representatives to talk about ongoing issues. Some of these representatives were Hon. Robert Cutajar, Hon. Jerome Caruana Cilia, Hon. Ivan Castillo, and Hon. Claudette Pace.



International Monetary Fund (IMF)

On the 13th of July, in the past, President Mr. Paul Abela, Deputy President Mr. Philip Fenech, and Council Member Mr. Beppe Muscat met with a group of people from the International Monetary Fund (IMF). The IMF is an organization that works to help all 190 countries that are members of it to grow their economies in a way that is sustainable and leads to prosperity for all. This is done by supporting policies that encourage cooperation between countries when it comes to money and finance. This is important because it helps to create jobs, boost economic growth, and increase productivity. During the meeting, the Chamber of SMEs discussed the current state of the economy, the challenges that small and medium-sized enterprises are facing today, and ultimately came up with solutions to help them overcome these difficulties.



EU SME Assembly

In 2022, the CEO of the SME Chamber attended the SME Assembly in Prague after winning the National Enterprise Support Awards. At the Assembly, the President of SMEunited, Petri Salminen, and the Secretary General, Veronique Willems, spoke to the audience. Back in 2020, they also addressed the SME Assembly.



Dubai EXPO

During the Dubai Expo, the SME Chamber took part in two separate events. In January, the CEO of the SME Chamber attended the Malta Day at the Dubai Expo with a delegation made up of various organizations. The Malta Day event featured a series of official activities.

In March, the SME Chamber Council acted as a delegation to the EXPO. During this trip, the SME Chamber delegation, together with Ms Josephine Farrugia, Events Coordinator at the EXPO, visited numerous pavilions and had meetings with officials from different countries.

To start off, the SME Chamber delegation met with the Dubai Chamber at the EXPO. They exchanged ideas and discussed the possibility of further collaboration between the two sides. After that, the delegation visited the Egyptian pavilion and met two high-ranking officials representing the Egyptian Government before touring the pavilion. Dr. Khaled Melad Rezek, the Egypt Pavilion Director, said that both countries could enhance their relationship and increase business opportunities in the future.

Overall, the SME Chamber had a productive and engaging time at the Dubai Expo, meeting with various entities and exploring new opportunities for collaboration.







SME Chamber Council



During 2022 the executive council meetings met regulalry in order to ensure the successful operation, effectiveness and impact of the Malta Chamber of SMEs.

	13 th	22 nd	15 th	28 th	4 th	2 nd	13 th	13 th	P	E
	Jan	Feb	Mar	Apr	May	Jun	Jul	Sep		
				AGM						
Abela Paul	Р	P	Р	Р	Р	Р	Р	Р	8	
Camilleri Sergio	Р	Р	Р	E	Р	Р	Е	E	5	3
Ciantar Mario	Р	Р	Р	Р	Р	Р	Р	Р	8	
Cutajar Patrick	E	Р	Р	Р	Р	Р	Е	Р	6	2
Debono Mario	Р	Р	Р	Р	Р	E	E	E	5	3
Fino Dino	Р	Р	Р	Р	Р	E	Р	Р	7	1
Fenech Alfred	E	Р	E	E	Р				2	3
Fenech Philip	Р	Р	Р	Р	Р	Р	Р	Р	8	
Galea Michael	Р	Р	Р	E	Р	Р	Р	Е	6	2
Gauci Noel	Р	Р	Р	Р	Р	Р	Р	Р	8	
Haber Joan	Р	Р	Р	Р	Р	Р	Р	Е	7	1
Micallef Marthese	Р	Р	Р	E	Р	Р	Е	Р	6	2
Micallef Robert	Р	Р	Р	Р	Р	Р	Р	Р	8	
Mizzi Marcel	Р	Р	Р	Р	Р	Р	Р	Р	8	
Muscat Beppe	Р	Р	Р	Р	Р	Р	Р	Р	8	
Shoemake Claire					Р	Р	Р	Р	4	
Vassallo Christian	Р	Р	Р	Р	E	E	E	E	4	4
Zammit Carmel	E	E	E	Р	Р	Р	Е	Р	3	4
Zerafa Joseph	Р	Р	Р	Р	Р	Р	E	Р	7	1

Notes	



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