

## **PUBLIC CONTRACTS REVIEW BOARD**

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### **Case 1258 – CT 3245/2018 – Tender for the Delivery and Commissioning of Six (6) Fully Electric Powered Buses for the Ministry for Gozo including Energy Efficient Monitors**

The publication date of the call for tenders was the 25<sup>th</sup> November 2018 whilst the closing date of the call for tenders was 11<sup>th</sup> December 2018. The estimated value of the tender (exclusive of VAT) was € 2,197,600.

On the 24th December 2018 Michael Debono Ltd filed an appeal against the Ministry for Gozo as the Contracting Authority objecting to not being awarded the tender on the grounds that their offer was not the cheapest. A deposit of € 10,988 was paid.

There were four (4) bidders and eight (8) bids.

On 24th January 2019 the Public Contracts Review Board composed of Dr Anthony Cassar as Chairman, Dr Charles Cassar and Mr Carmel Esposito as members convened a public hearing to discuss the objections.

The attendance for this public hearing was as follows:

#### **Appellants – Michael Debono Ltd**

Dr John Gauci	Legal Representative
Dr David Zahra	Legal Representative
Mr Victor Bonello	Representative
Mr Michael Debono	Representative
Ms Nicoletta Moss	Representative

#### **Recommended Bidder – Commercial Vehicle Imports Ltd**

Dr Lucio Sciriha	Legal Representative
Mr Christopher Cassar	Representative
Mr Matthew Fenech	Representative
Ms Ruby Fenech	Representative

#### **Contracting Authority – Ministry for Gozo**

Dr Abigail Caruana Vella	Legal Representative
Mr Joseph Cutajar	Chairperson Evaluation Committee
Mr Joseph Piscopo	Secretary Evaluation Committee
Eng Matthew Borg	Member Evaluation Committee
Ms Vicky Xuereb	Representative

Mr Manwel Sultana

Representative

**Department of Contracts**

Dr Franco Agius

Legal Representative

Dr Anthony Cassar Chairman of the Public Contracts Review Board welcomed the parties and invited submissions.

Dr John Gauci Legal Representative of Michael Debono Ltd stated that the grounds for his clients' appeal were of a technical nature and he will be showing how the specifications in the tender were not met by the preferred bidder. He requested permission to call witnesses in support of his claim.

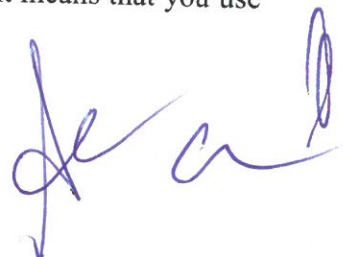
Mr Joseph Cutajar (1379G) called as a witness by the Appellant testified on oath that he was the Chairperson of the evaluation committee. The decision that the preferred bidder, who submitted five bids, was technically compliant was unanimous. Out of these five bids the cheapest compliant bid was awarded.

Witness was asked to quote the brand name of the vehicle in the winning bid – Dr Abigail Caruana Vella Legal Representative of the Ministry for Gozo objected stating that the brand name of the vehicle was immaterial to the specifications of the tender.

The Chairman intervened to advise the witness not to give the brand name, and said that the Board did not wish to have Appellants go on a fishing expedition by seeking answers to leading questions.

Continuing his evidence witness, asked a series of questions, said that the buses in the winning bid were 12 metres in length; accommodated driver plus 34 passengers seated and 35 standing; weight of bus and battery and air conditioner capacity had not been asked for in the tender; were supplied by LFP (lithium) battery; and the battery power asked for was 160 KWs minimum and bid winner had tendered 280 KWs power batteries.

Mr Victor Bonello (526364) called as a witness by the Appellants said on oath that he was an Electrical Engineer with a Masters in Sustainable Energy which included battery technology. The tender specified that the bus had to travel 190 kms on a single charge with air conditioning set at 20/25°C. A lithium battery in a bus usually had a power capacity of 140 to 180 KWs with a maximum of 180 KWs. A full bus uses .7 KWs per kilometre travelled which means that on a single charge it would travel 250 kms with the air conditioning off. In the summer months the air conditioning adds the equivalent of between 6 and 12 KWs per hour – therefore to travel at 20 kms per hour the battery uses 20 kms times .7 KWs plus 6 to 12 KWs per hour – on these values a 180 KWs battery power will not be able to do 190kms on a single charge. On the basis of the minimum of 6 KWs per hour for the air conditioning on the above figures it means that you use





20 KWs/hr in the first hour, 40 in the second hour and so forth so that by the ninth hour you have travelled 180 kms and used 186 KWs. Therefore all the power in the battery has been used to travel only 180 kms. The figures look worse when one takes into consideration shorter trips, loading and unloading of passengers etc. And in reality, under the values considered the result is that to travel 190 kms you need 60 hours of battery time.

Dr Caruana Vella said that all these calculations and values were based on a battery of 180 KWs power capacity. Appellants had so far not proved that the bid is not compliant – all they are doing is asking questions to try to prove their claim.

Mr Joseph Cutajar was recalled to answer further questions. He confirmed that there were eight bids, five of them by Commercial Vehicles Imports Ltd. Three of the bids were within the budget figure of € 2,197,600. The offer by Michael Debono Ltd was 41% over budget, and the cheapest compliant bid was chosen.

At this stage Dr John Gauci said that in view of the technical nature of this appeal he requested the appointment of a technical expert to evaluate the tender of the winning bidder and to give an expert opinion.

Dr Caruana Vella stated that in view of the request by Appellants, the Contracting Authority declares that the matter meriting the appeal is whether the vehicles' batteries reached the requisite stipulated in the tender in point 3.5.3 and 3.7.1. This information results clearly from the technical literature provided by the recommended bidder and therefore there is no need to appoint a technical expert

Mr Joseph Cutajar continuing his testimony stated that the buses had to have a range of 190 kms. The evaluating committee had examined the technical offer and the declaration of the battery manufacturer that it could reach travel range of 200 kms. They had relied on the literature submitted to make their decisions.

Dr Lucio Schiriha Legal Representative of Commercial Vehicles Imports Ltd said that once a bidder is bound to deliver under the tender he is bound by contract which if not performed is liable to penalties.

Dr Caruana Vella re-iterated that the Appellants had no information on which to base their appeal on the compliance aspect. If one referred to page 260 of the Technical Literature of the recommended bidder and the manufacturers' literature one could easily see that the stipulations had been met and the bid was technically compliant.

The Chairman thanked the parties for their submissions and declared the hearing closed.

## **SECOND HEARING**

On the 21<sup>st</sup> February 2019 the Public Contracts Review Board composed of Dr Anthony Cassar as Chairman, Mr Carmel Esposito and Mr Lawrence Ancilleri as members convened a public hearing to discuss the case further.

The attendance for this public meeting was as follows:

**Appellants – Michael Debono Ltd**

Ms Nicoletta Moss Representative

**Recommended Bidder – Commercial Vehicles Imports Ltd**

Dr Franco Galea Legal Representative

Mr Christopher Cassar Representative

Ms Ruby Fenech Representative

**Contracting Authority – Ministry for Gozo**

Dr Abigail Caruana Vella Legal Representative

Mr Joseph Cutajar Chairperson Evaluation Board

Mr Joseph Piscopo Secretary Evaluation Board

Eng Matthew Borg Member Evaluation Board

Eng Christian Cordina Member Evaluation Board

Mr Charles Hili Member Evaluation Board

Ms Vicky Xuereb Representative

Dr Anthony Cassar, Chairman of the Public Contracts Review Board welcomed the parties and stated that as requested at the first hearing a technical expert had been appointed to evaluate the claims of the winning bid and present a report. The report had been circulated to the parties concerned and the expert will be presenting the report personally at this hearing. In the meantime the Appellant Company had signified their intention of withdrawing their appeal.

Dr Cedric Caruana from the Department of Ind. Electrical Power Conversion of the University of Malta stated that he had followed the instructions to prepare a report regarding the expected driving range of the Foton AUV electric buses. His report dated 5<sup>th</sup> February 2019 had been presented as requested.

Ms Nicoletta Moss confirmed on oath that the Appellant Company had submitted an e-mail indicating that following sight of the expert's report they were withdrawing their objection.

Copies of the Expert's Report and the e-mail from Appellants are filed with the Minutes of these hearings.

The Chairman thanked both parties and declared the hearing closed

**This Board,**

**having noted this Objection filed by Michael Debono Limited, (hereinafter also referred to as the Appellants) on 24 December 2018, refers to the contentions made by the same Appellants with regards to the Tender of Reference CT 3245/2018 listed as Case No 1258 in the records of the Public Contracts Review Board, awarded by the Ministry for Gozo, (hereinafter also referred to as the Contracting Authority).**

**Appearing for the Appellants:**

**Dr John Gauci**

**Dr David Zahra**

**Appearing for the Contracting Authority:**

**Dr Abigail Caruana Vella**

**Appearing for the Department of Contracts:**

**Dr Franco Agius**

**Whereby, the Appellants contend that:**

- a) their main objection is that, the batteries offered by the Preferred Bidder cannot achieve the requested functional ability of the Tender and in this respect, since this Appeal is of a highly technical nature, the Appellants are requesting that an expert be appointed by the Public**





Contracts Review Board to assess whether the offered batteries of the successful offer can achieve the dictated results.

This Board has also noted the Contracting Authority's "*Reasoned Letter of Reply*" dated 29 December 2018 and also its verbal submissions during the Public Hearings held on 24 January 2019 and 21 February 2019, in that:

- a) The Ministry for Gozo maintains that the Preferred Bidder's offer is technically compliant and the cheapest. In this regard, the Ministry insists that, it had carried out the evaluation process in a just and transparent manner and at the same instance, the Contracting Authority contends that the Appellants did not provide credible proof to justify their claims.

This same Board has also noted the testimony of the witnesses namely:

1. Mr Joseph Cutajar who was duly summoned by Michael Debono Limited;

2. Mr Victor Bonello who was duly summoned by Michael Debono Limited;



3. Dr Cedric Caruana who was duly summoned by the Public Contracts Review Board as the appointed expert to confirm his report;

4. Ms Nicoletta Moss who was duly summoned by the Public Contracts Review Board to confirm Michael Debono Limited's withdrawal of this Appeal

This Board held the first Public Hearing on 24 January 2019, during which various submissions were made by all parties concerned, including the testimony of the witnesses duly summoned. During this Hearing, Michael Debono Limited requested, that, since this Appeal is of a highly technical nature, the Board should appoint an independent technical expert to assess whether the batteries being offered by Commercial Vehicles Imports Limited have sufficient capacity to cope with the dictated requirements of the Tender.

In this regard, this Board appointed Dr Cedric Caruana, an electrical power conversion engineer to submit a report and to determine whether the

Preferred Bidder's offered batteries were capable to support the dictated services which had to be provided by the fully electric powered buses.

On 5 February 2019, Dr Cedric Caruana submitted his report, which was distributed to all the parties concerned and a second Public Hearing was scheduled for 21 February 2019, to discuss such a report.

Prior to the scheduled date of the hearing, (21 February 2019), this Board received communication from Michael Debono Limited on 19 February 2019, stating the following:

*"Dear Mr Zarb,*

*Thank you very much getting a third party involved. Based on those calculation we withdraw the objections. If we would have known the specifications beforehand than we would have not gone through this entire procedure.*

*I have dropped off today an according signed notice of withdrawal.*

*Thank you,*





*Nicoletta Moss.”*

The following day, on 20 February 2019, Michael Debono Limited’s Legal Advisor, Dr John Gauci, sent a second communication, confirming the Appellants’ withdrawal of this Appeal as follows:

*“Dear Mr Abela*

*Kindly note that our clients have withdrawn their objection. Unfortunately neither me nor Dr Zahra would be able to attend the sitting set for tomorrow. (I will be abroad).*

*In the circumstances and considering that the appeal has been effectively withdrawn, kindly confirm whether sitting will still take place, other than for cognizance of withdrawal of same, that is.*

*Best regards*

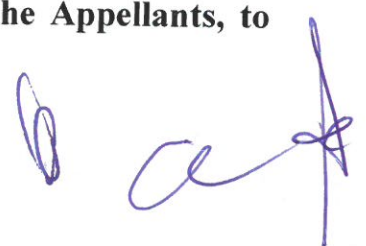
*John.”*

In view of the above, this Board opined that the scheduled hearing set for 21 February 2019, was to be held so as to confirm the Appellants' intention and in this regard, Michael Debono Limited's representative, Ms Nicoletta Moss, confirmed under oath that the Appellants are withdrawing their appeal.

**The conclusions drawn by this Board**

During the first sitting which was held on 24 January 2019, this Board heard lengthy submissions made by the interested parties and the witnesses duly summoned; after appointing an independent expert and receipt of the latter's technical assessment of the Preferred Bidder's offer, the expert confirmed that the batteries offered by Commercial Vehicles Imports Limited were capable of generating the requested supply of energy for the electric buses to provide the dictated service.

In view of the above, this Board, since the objections raised by the appellants have been withdrawn, decides that it can no longer deliver any decision on the merits of this case but can only decide on whether the deposit paid should be re-imbursed or not and so this Board directs that an amount of four thousand euro (€ 4,000) is to be retained from the deposit paid by the Appellants, to



cover the costs of this Appeal including the remuneration to the technical expert appointed by the Board. This Board also directs that the expert's technical report is to form part of this decision.

Dr Anthony Cassar  
Chairman

26<sup>th</sup> February 2019

Dr Charles Cassar  
Member

Mr Carmel Esposito  
Member



# Opinion report on the Driving Range of the Foton AUV fully Electric Buses proposed by CVI Ltd for tender CT3245/2018.



I was asked by the PCRb to express my opinion regarding the expected driving range of the Foton AUV fully-electric buses proposed by CVI Ltd for tender CT3245/2018. Relevant parameters are extracted from the submission and some assumptions are set to estimate a theoretical range under different driving conditions. The obtained figures are compared to relevant performance figures published in the literature. Having established the driving ranges, the range specified by the manufacturer is then assessed.

Driving range is an important feature of electric vehicles since current battery technology does not achieve the same energy density as conventional fossil fuel. The calculation of the driving range is compounded by the variable conditions typically experienced, especially in urban driving. This includes frequent starting and stopping, variable velocity and road gradient throughout a trip. In addition, electric drivetrains are typically capable of regeneration during braking which might extend the range albeit by a low percentage. Due to the possible variability in the driving patterns, a first estimate is generally obtained under the assumption of constant velocity conditions on level ground. This approach establishes a ballpark figure which facilitates comparison across offerings from different manufacturers.

The force exerted on the wheels of a vehicle, hereby called the 'tractive effort', has to overcome mainly the rolling resistance; the aerodynamic drag; and the component of the vehicle's weight acting down a slope to propel the vehicle at constant speed. Further tractive effort needs to be exerted to accelerate the vehicle if the velocity is not constant. Mathematically, the tractive effort at the wheels  $F_{te_w}$  can then be approximated by (1), where  $F_{rr}$  is the rolling resistance force,  $F_{ad}$  is the aerodynamic drag force,  $F_{hc}$  is the hill climbing force and  $F_{la}$  is the acceleration force. The rolling resistance depends mainly on the characteristics of the vehicle's tyres. The frontal shape and dimensions establish the aerodynamic drag experienced by the vehicle. The road gradient determines the required hill climbing force. Lastly, the required vehicle acceleration determines the acceleration force.

$$F_{te_w} \cong F_{rr} + F_{ad} + F_{hc} + F_{la} \quad (1)$$

The tractive power at the wheels  $P_{te_w}$  is obtained through multiplication of the tractive effort expressed by (1) by the velocity  $v$ , as in (2). Accounting for the losses in the drivetrain, the tractive power from the battery  $P_{te_b}$  will be slightly higher, as expressed in (3) in terms of the drivetrain efficiency  $\eta_{dt}$ .

$$P_{te_w} = F_{te_w} \cdot v \quad (2)$$

$$P_{te_b} = \frac{P_{te_w}}{\eta_{dt}} \quad (3)$$

For the case of fully electric buses, the battery is also required to supply power to the air-conditioning unit ( $P_{ac}$ ), hence the total power delivered by the battery  $P_{tot_b}$  is given by (4). In order to ensure longevity of the battery, a state of charge (SOC) usage window is typically recommended by the



manufacturer. Considering the useable energy  $\Delta E$  and assuming constant velocity, the hypothetical driving range  $R_{cv}$  can be calculated as in (5).

$$P_{tot,b} = P_{te,b} + P_{ac} \quad (4)$$

$$R_{cv} = \frac{\Delta E}{P_{tot,b}} \cdot v \quad (5)$$

The parameters listed in Table 1 are extracted from the submitted documentation on the Foton AUV fully-electric bus. Table 2 shows the assumed parameters relating to the battery and the drivetrain.

Table 1: Extracted parameters

Vehicle	
LxBxH [mm]	12000x2550x3250 (assumed with A/C)
Curb Weight [kg]	12,600
Max total mass [kg]	18,000
Tyres	Michelin 275/70R22.5
Battery	
Type	Lithium iron phosphate (LFP)
Manufacturer	CATL
Capacity [kWh]	350
Air-conditioning Unit	
Manufacturer	Valeo
Model	Revo -E Global
Blowers nominal consumption [kW]	1.82
Compressor regulated consumption [kW]	6.6

Table 2: Assumed parameters

Battery	
SOC usage window	10% - 90%
Drivetrain	
Transmission	Direct drive
Efficiency	0.846

Applying the parameters set in Tables 1 and 2 into equations (1)–(5), the driving range of the Foton AUV bus for three constant speed scenarios on level ground is estimated and reported in Table 3. Half- and full- passenger loading conditions are considered. Summer conditions are assumed, with the air-conditioning unit operating under regulated conditions for 50% of the driving range. Effects of the discharge rate on the battery capacity are not considered. It can be observed that both the increase in loading and increase in velocity (40km/h to 60km/h) lead to range reductions of slightly over 10%. It is noted that regeneration is not considered in the above driving ranges.

Table 3: Driving range for constant velocity, flat ground conditions

Velocity	40 km/h	50 km/h	60 km/h
Range for half loaded condition [km]	276	261	242
Range for fully loaded condition [km]	246	233	218

Given the electric buses' intended use to shuttle passengers in Gozo, a measure of elevation is introduced in order to make the route more realistic. Assuming an elevation of 6% for different stretches of the route, the revised ranges are shown in Table 4. Only full passenger loading condition is considered. It can be observed that the requirement of hill climbing force leaves a marked impact on the range, with the figures decreasing by around 40% following the introduction of 25% of the route at elevation and a further 30% to 50% of the route.

Table 4: Driving range for constant velocity with stretches of route at elevation.

Velocity	40km/h	50km/h	60km/h
Range for 25% route at elevation [km]	139	135	130
Range for 50% route at elevation [km]	97	95	93

Further to the calculations above, the electric bus performance is compared to published figures relating to trials in cities abroad. Reference [1] reports the testing of electric buses in Brno, Czech Republic. The buses are tested in real conditions with passengers, in which the average consumption of a 12m bus is reported at 1.3kWh/km. Reference [2] also considers a 12m bus, tested with all auxiliaries shut off except for dipped headlights. Specific driving cycles are used to carry out the range test. The bus achieves an energy consumption of 1.19kWh/km, which compares well with the consumption reported in [1]. Similar consumption figures for the constant velocity, flat ground scenarios shown in Table 1 are deduced and shown in Table 5. Given the different operating conditions, particularly the constant velocity assumption and the operation of the air-conditioning unit, the consumption figures compare well with the previous values from [1] and [2].

Table 5: Consumption for constant velocity, flat ground conditions

Velocity	40km/h	50km/h	60km/h
Energy Consumption at half loading [kWh/km]	1.01	1.07	1.16
Energy Consumption at full loading [kWh/km]	1.14	1.20	1.28

For the FOTON AUV bus, the manufacturer specifies a driving range of 269km for a battery capacity of 350kWh and with air-conditioning unit operation. The conditions under which this range applies are not specified. It is noted that the specified figure fits within the ranges shown in Table 3, possibly taking energy regeneration into account. This implies that similar conditions are assumed in the calculation of the specified range.

This report has established estimates for the driving range of a 12m fully-electric bus under different conditions. It was shown that the range can drop markedly as the driving conditions deviate from the constant speed, flat ground scenario. Overall, I conclude that the driving range specified by the manufacturer for the Foton AUV fully-electric bus is realistic.

*Cedric Caruana*

Dr Cedric Caruana  
Department of Ind. Electrical Power Conversion  
Faculty of Engineering,  
University of Malta



## References

1. J. Cerny, "Testing of five different types of electric buses," CIVITAS forum 2015, Ljubljana, Slovenia, Oct 2105.
2. S. van Goethem, G. Koomneef and S. Spronkmans, "Performance of battery electric buses in practice: energy consumption and range," TNO report, Feb. 2013.

## Abela Antonello at MFIN

**From:** Nicoletta Moss [nicoletta.moss@debonogroup.com.mt]  
**Sent:** 19 February 2019 15:18  
**To:** Zarb Raymond at MFIN  
**Cc:** 'Harry'; Fenech Harry at MFIN; Vella Carmen at MFIN; Abela Antonello at MFIN  
**Subject:** AW: Objection CT 3245/2018 - Tender for the Delivery and Commissioning of Six (6) Fully Electric Powered Buses for the Ministry for Gozo including Efficient Monitors

Dear Mr. Zarb,

Thank you very much getting a third party involved. Based on those calculation we withdraw the objections. If we would have known the specifications beforehand than we would have not gone through this entire procedure.

I have dropped off today an according signed notice of withdrawal.

Thank you,

Nicoletta Moss

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**Von:** Zarb Raymond at MFIN <[raymond.zarb@gov.mt](mailto:raymond.zarb@gov.mt)>

**Gesendet:** Mittwoch, 6. Februar 2019 12:34

**An:** Nicoletta Moss

**Cc:** 'Harry'; Fenech Harry at MFIN; Vella Carmen at MFIN; Abela Antonello at MFIN; Zarb Raymond at MFIN

**Betreff:** RE: Objection CT 3245/2018 - Tender for the Delivery and Commissioning of Six (6) Fully Electric Powered Buses for the Ministry for Gozo including Efficient Monitors

Ms Nicoletta Moss  
Michael Debono Limited

**RE: Objection CT 3245/2018 - Tender for the Delivery and Commissioning of Six (6) Fully Electric Powered Buses for the Ministry for Gozo including Efficient Monitors**

Please also note that the Public Contracts Review Board has set **Thursday 21 February 2019** as the date of the public hearing in connection with the Objection filed by **Michael Debono Limited** in respect of the tender in caption which has been recommended for award to **Commercial Vehicles Imports Limited**. It shall convene at the premises of the Public Contracts Review Board, Notre Dame Ditch, Floriana at **11.30am**

You are kindly requested to communicate by return to the undersigned, by latest **Tuesday 19 February 2019 at 12:00 hours (noon)**, the name/s of those who will be attending the hearing.

Please note that the Public Contracts Review Board adopts a **No Postponement Policy** and thus you are kindly asked to stick to the date given.

Kindly acknowledge receipt

Thanks and Regards

Raymond Zarb

f/Secretary  
Public Contracts Review Board

t +356 25998704 e [raymond.zarb@gov.mt](mailto:raymond.zarb@gov.mt)  
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MINISTRY FOR FINANCE  
NOTRE DAME DITCH, FLORIANA, MALTA

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***N.B. Dress Code: Smart***



## Abela Antonello at MFIN

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**From:** Dr. John L. Gauci [info@gaucilegal.com]  
**Sent:** 20 February 2019 15:32  
**To:** Abela Antonello at MFIN  
**Cc:** David Zahra; Nicoletta Moss; Michael Debono; Vella Carmen at MFIN; Fenech Harry at MFIN; Zarb Raymond at MFIN  
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Dear Mr Abela

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In the circumstances and considering that the appeal has been effectively withdrawn, kindly confirm whether sitting will still take place, other than for cognizance of withdrawal of same, that is.

Best regards

John

On 20 Feb 2019, at 09:42, Nicoletta Moss <[nicoletta.moss@debonogroup.com.mt](mailto:nicoletta.moss@debonogroup.com.mt)> wrote:

Good morning,

I have dropped off the letter and sent an email that we are withdrawing, but we still have to attend tomorrow's meeting.

David will you come with me tomorrow please?

Thank you,

Nicoletta

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**Von:** Abela Antonello at MFIN <[antonello.abela@gov.mt](mailto:antonello.abela@gov.mt)>

**Gesendet:** Mittwoch, 20. Februar 2019 09:39

**An:** Nicoletta Moss

**Cc:** 'Harry'; Fenech Harry at MFIN; Vella Carmen at MFIN; Zarb Raymond at MFIN

**Betreff:** RE: Objection CT 3245/2018 - Tender for the Delivery and Commissioning of Six (6) Fully Electric Powered Buses for the Ministry for Gozo including Efficient Monitors

Dear Ms Moss

With reference to the subjoined e-mail, kindly note that the Public Hearing will still be held tomorrow and that you are kindly asked to make this submission during same.

Regards

Antonello Abela  
f/Secretary  
Public Contracts Review Board

t +356 25998706 e [antonello.abela@gov.mt](mailto:antonello.abela@gov.mt) | [www.finance.gov.mt](http://www.finance.gov.mt)  
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Ms Nicoletta Moss  
Michael Debono Limited

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Kindly acknowledge receipt

Thanks and Regards

**Raymond Zarb**

f/Secretary

Public Contracts Review Board

t +356 25998704 e [raymond.zarb@gov.mt](mailto:raymond.zarb@gov.mt)

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MINISTRY FOR

NOTRE DAME DITCH, FL

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