



BPC 2503

AP Valletta

Professional Conduct Decision

16/09/2026

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**Kamra
tal-Periti**

Investigation

The Council of the Kamra tal-Periti, upon learning of media reports published by The Shift on 18th January 2025 alleging that a newly installed raised floor within the Bartolott Crypt at St John's Co-Cathedral, Valletta, had “caved in” and caused severe damage to the historic resting place of approximately 600 Knights of the Order of St John, opened an ex officio investigation to establish whether a perit had acted in a manner which violated the parameters set by the Periti Act, Cap. 390, Article 15 (a), and Subsidiary Legislation 390.01 regulation 5, including:

- Dishonesty, misconduct, or gross negligence in the exercise of the profession;
- Conduct discreditable to the profession;
- Failure to comply with regulations with respect to professional standards or practices;
- Breach of a Directive issued by the Council of the Kamra tal-Periti under Article 12 of the Periti Act.

On 22nd January 2025, the Council wrote separately to Perit Konrad Buhagiar and Perit David Felice, giving them the opportunity to submit comments for the Council's consideration and inviting a reply by 12th February 2025¹; to the St John's Co-Cathedral Foundation, requesting relevant information and documentation, and noting the Foundation's press release of 21st January 2025 on the matter; and to The Shift, requesting any additional unpublished information relevant to the investigation and inviting its source(s) to come forward. The Shift replied on 23rd January 2025 declining to disclose its sources, stating that the information published had been verified beforehand.

Mr David Felice, on behalf of AP Valletta, acknowledged receipt of the Council's correspondence on 24th January 2025, confirming that a formal reply would follow within the established deadline, and noting AP Valletta's surprise that the Council had written separately to its client for “technical information”, since such information would normally be provided by the architect rather than the client². Mgr Prof. Emmanuel Agius replied on 26th January 2025 endorsing AP Valletta's position on this point, confirming the Foundation's willingness to cooperate with the Council on non-technical matters³.

¹Letter from Mr Anthony Cassar (Kamra tal-Periti) to Perit Konrad Buhagiar and Perit David Felice, 22nd January 2025, Ref. CORR 1-2025.

²Email from Mr David Felice (AP Valletta) to Mr Anthony Cassar, 24th January 2025.

³Email from Mgr Prof. Emmanuel Agius (St John's Co-Cathedral Foundation) to Mr David Felice, copied to Mr Anthony Cassar, 26th January 2025.

AP Valletta, through Perit Danica Cachia Mifsud, submitted a dossier titled “*Bartolott Crypt – Walkway*” (Job Ref. C00410.00, dated 3rd February 2025) setting out the structural rationale for the raised walkway installed within the Crypt. Following a further exchange in late February and early March 2025 regarding the timing of the Council's review, the Council put further queries to AP Valletta on 4th March 2025, asking (i) whether the raised flooring was the only solution considered for the project, and (ii) why the bearing capacity of the existing *ċangatura* and its underlying build-up was not analysed prior to intervention. AP Valletta replied in writing on 10th March 2025, addressing both queries in detail.

Having examined this correspondence and the accompanying technical documentation, the Council determined, by letter dated 17th March 2025, that the evidence met the criteria for a formal professional conduct case to be opened, and accordingly opened case BPC 2503⁴. That letter informed AP Valletta that it, and other witnesses, would be given the opportunity to testify under oath and answer the Council's questions at a forthcoming hearing; reminded AP Valletta of its right to be represented by legal counsel throughout the proceedings; and expressly recorded that the determination to proceed did not imply any wrongdoing, and that the presumption of innocence applied. This letter was transmitted to the partnership on 18th March 2025⁵.

The Council notes that AP Valletta is a partnership of periti registered pursuant to the Periti Act, and that, not being a warrant holder, a partnership cannot itself be made subject to a professional conduct determination under Article 15 of the Act. The purpose of the hearings that followed was accordingly, in part, to establish which individual warrant holder(s) within the partnership held direct executive responsibility for the decisions taken on the Bartolott Crypt works, so that the Council's determination could be made against the appropriate individual(s).

Perit David Felice and Perit Konrad Buhagiar, partners of AP Valletta at the material time, and Perit Danica Cachia Mifsud, who was not yet a partner of AP Valletta at the material time but had become one by the time of these hearings, appeared before the Council over the course of the proceedings, assisted by Dr Veronique Dalli and Dr Rachel Powell.

⁴Letter from Perit Andre Pizzuto (President, Kamra tal-Periti) to AP Valletta, 17th March 2025, Ref. CORR 01/2025.

⁵Email from Mr Anthony Cassar (Kamra tal-Periti) to AP Valletta Partnership, 18th March 2025, Ref. CORR 1/2025, attaching the Council's letter of 17th March 2025.

Through the evidence gathered in the course of the hearings (summarised below), it emerged that Perit Danica Cachia Mifsud held direct executive and design responsibility for the Bartolott Crypt works as project lead throughout the material period, and became a partner of AP Valletta after the events giving rise to this case but before its determination. It further emerged that Perit Konrad Buhagiar, a founding partner of AP Valletta, was personally and directly involved in the project, attending site regularly and participating in the decisions taken in respect of the works. Perit David Felice, also a partner of AP Valletta at the material time, was found to have had no direct involvement in the Bartolott Crypt works; he was accordingly deemed professionally extraneous to this case, and no determination is made in his respect.

The Council's determination in this case is accordingly made personally against Perit Danica Cachia Mifsud and Perit Konrad Buhagiar.

Evidence

The Council of the Kamra tal-Periti held eight conduct hearings, on 28/04/2025, 28/07/2025, 22/09/2025, 01/12/2025, 23/03/2026, 27/04/2026, 18/05/2026 and 15/06/2026, during which the following persons testified under oath: Perit Danica Cachia Mifsud, Perit Konrad Buhagiar, Mr Jeremy Besançon (archaeological monitor), Mr Raymond Camilleri (shareholder, Camray Ltd), and Mr Tonio Mallia (CEO, St John's Co-Cathedral Foundation).

Minutes and transcriptions of the hearings were prepared and circulated to the respondents, who were also given access to the documentation gathered during the investigation and submitted during the proceedings, including correspondence, technical dossiers, planning records, and photographic surveys.

Below is a summary of the evidence material to these professional conduct proceedings.

1. The allegations as reported

The Shift's article of 18th January 2025, headlined “*New floor caves in as St John's Co-Cathedral project in collapse*”, reported that a new floor installed in the Bartolott Crypt had “caved in, causing severe damage to the historic resting place of approximately 600 Knights of the Order of St John”, and quoted an unnamed “experienced employee” as stating: “What we warned the architects would happen did happen, and we are furious about the situation. This could have easily been avoided; the signs were clear.” The article stated that the incident, and subsequent damage, occurred “around April 2024”, and named AP Valletta as the designer of the raised flooring.⁶

2. Design rationale for the raised walkway

AP Valletta's dossier of 3rd February 2025 and its reply of 10th March 2025 set out that the existing *čangatura* within the Bartolott Crypt was misaligned and uneven, and that a structural assessment concluded the historic floor could not safely sustain the new public-access loading required by the Foundation's brief (footfall of Museum visitors and

⁶The Shift, “New floor caves in as St John's Co-Cathedral project in collapse”, 18th January 2025.

showcase loads, assessed against EN 1991-1-1:2002 Load Category C5). AP Valletta's evidence was that the raised walkway was designed as a fully reversible intervention limited to the areas of anticipated pedestrian traffic, transmitting loads through non-shrink grout bearing pads positioned over surveyed load-bearing arches and walls of the three subterranean burial chambers beneath the Crypt, sized so that the mobilised stresses approximated those already historically exerted on the *ċangatura*; in the central area, where no underlying chambers were identified, longer continuous bearing strips were used to spread the load further.

3. Chronology of the *ċangatura* settlement, February–July 2024

Contemporaneous correspondence places the origin of the matter at 28th February 2024, when Mr David Mifsud of E&L Enterprises (sub-contractor to Camray Ltd, the main contractor) emailed Camray to report:

“...we had a lot of issues to level the floor at ‘Bartolott’ at first we thought that the cause, was that the floor in the bartolott is uneven, but after installing the missing beam next to the door and we were levelling the structure last Monday morning, we noted that the stone flooring is going slowly down in risk of collapsing.”⁷

The correspondence between March and July 2024 records a dispute as to sequencing: Camray, through its architect Perit Audrey Ann Attard, repeatedly requested that AP Valletta issue a “safe loading certificate” confirming the site was safe to work upon, while AP Valletta maintained that Camray/E&L first had to submit a complete method statement for the proposed realignment works. Perit Danica Cachia Mifsud stated on 15th March 2024:

“A compromise to safety is a result of the works and therefore it is imperative that we are aware of the works methodology in order to issue our recommendations in this regard.”⁸

⁷Email from Mr David Mifsud (E&L Enterprises) to Ms Audrey Ann Attard (Camray Ltd), 28th February 2024, 15:37, forwarded to AP Valletta same day.

⁸Email from Perit Danica Cachia Mifsud to Ms Audrey Ann Attard, 15th March 2024, 09:08.

AP Valletta's dossier timeline records that, following an on-site inspection, a method statement for the removal and consolidation of the affected *ċangatura* was developed in consultation with the archaeological monitor and submitted to the Superintendence of Cultural Heritage (SCH) on 1st April 2024; the SCH provided comments on 15th April 2024, and approved the revised method statement on 29th May 2024. Removal of the affected pavers, under archaeological monitoring, took place between 22nd April and 9th May 2024. Upon removal, the underlying bedding was found to consist of loose, poorly compacted fill containing voids and post-war/modern debris, including broken glass. A lime-based hydraulic concrete material, imported from Italy for compatibility with the historic fabric, was used to consolidate the affected areas; this consolidation work was completed on 16th July 2024, following which the contractor recommenced the structural realignment works in September 2024.

4. Pre-existing condition of the Bartolott Crypt floor

The Restoration Method Statement prepared in December 2014 as part of the original planning application for the Museum extension (PA/00472/15) – predating AP Valletta's remedial works by approximately a decade – already recorded, in its assessment of existing conditions:

“...over the below ground burial chambers, some of the paving slabs have been displaced, suggesting partial collapse of the burial chamber roofs. Further investigatory works will be required to understand the extent of the problem.” (Plate D2: Collapsed Paving in Bartolott Crypt)⁹

This document further confirms that repair and cleaning of the existing stone paving fell within the scope of the works covered by the 2014 planning permission.

⁹Restoration Method Statement, Doc Ref. C00410_141219_RMS, December 2014, Section D (Existing Condition), Plate D2.

5. Testimony of Mr Jeremy Besançon (archaeological monitor)

Mr Besançon, engaged by the St John's Co-Cathedral Foundation and operating under the direction of the SCH, was asked directly whether the method statement governing the works – prepared by AP Valletta and submitted to and approved by the SCH – had been complied with on site. He testified:

AP: “Il-method statement li ġie preżentat lill-SCH, li ġie preparat mill-AP Valletta – ġie segwit?”

JB: “Iva. Ġie segwit, mill-bidu sal-aħħar, taht il-monitoraġġ tagħna. U l-SCH kienu updated matul il-proċess kollu.”¹⁰

Under cross-examination, when it was put to him that the statement that the Bartolott Crypt floor had collapsed was incorrect, he testified:

VD: “Orrajt, imma statement illi l-art tal-kripta kkollasat huwa skorrett, naqblu?”

JB: “Le, le. Huwa skorrett for sure.”¹¹

6. Testimony of Mr Raymond Camilleri (Camray Ltd)

Mr Camilleri, shareholder of Camray Ltd, gave evidence over several hearings. His testimony was, at points, imprecise and difficult to reconcile with the documentary record. Asked directly whether the ground movement he had described constituted damage, he testified:

AP: “Mela inti qed tgħid, subsidence għalik mhijiex ħsara, iva jew le?”

RC: “Mhijiex ħsara, huwa moviment, mhux ħsara.”¹²

¹⁰Transcript of Conduct Hearing held on 22/09/2025 (Jeremy Besançon) – 12.00 – 13.59.

¹¹Transcript of Conduct Hearing held on 22/09/2025 (Jeremy Besançon) – 19.00 – 19.59.

¹²Transcript of Conduct Hearing held on 27/04/2026 (Raymond Camilleri) – 5.00 – 5.59.

At the same hearing, he was shown a photograph reproduced in AP Valletta's own dossier of 3rd February 2025, captioned as showing a “localised area with subsided floor” – the same term he himself had used – and was unable to confirm whether the condition depicted pre-dated or post-dated Camray's works on site:

AP: “...Issa, dik kienet hekk qabel ma bdejt x-xogħol?”

RC: “Ma niftakarx li kienet hekk qabel ma bdejna x-xogħol.”

AP: “Jigifieri ġrat wara din?”

RC: “Jiena ma niftakarx li dik kien hemm ċangatura maqluġha.”¹³

He confirmed that the design of the raised-flooring structure, and its subsequent revisions, were prepared exclusively by AP Valletta and that Camray had no involvement in the design, and that Camray's works did not involve removal or relaying of the cangatura itself. Under further cross-examination by counsel for AP Valletta, he agreed that, as shareholder rather than a daily on-site presence, he was not in a position to speak to the condition of the floor itself:

VD: “...naqblu li inti x-shareholder, fis-sens inti d-Direttur, ix-shareholder tal-kumpanija etcetra, you're not there on site kuljum, naqblu?”

RC: “Le, użgur li le.”¹⁴

7. Testimony of Perit Konrad Buhagiar

Perit Buhagiar, a founding partner of AP Valletta, confirmed under oath that he had worked on the wider St John's Co-Cathedral Museum project since 2011, that his role encompassed overall design responsibility, planning and UNESCO approvals, and oversight of the works, and that he attended site with variable but material frequency (between two

¹³Transcript of Conduct Hearing held on 27/04/2026 (Raymond Camilleri) – 7.00 – 7.59, referring to AP Valletta's dossier of 3rd February 2025.

¹⁴Transcript of Conduct Hearing held on 27/04/2026 (Raymond Camilleri) – 22.00 – 22.59.

and several times weekly, and at times daily), and that he was personally aware of, and involved in, the decisions taken in respect of the crypt, including site visits when the settlement issue arose. Asked directly, in light of the newspaper reports, whether the crypt floor had collapsed, he testified:

VD: “...Naqblu illi fl-ebda ħin – l-art ma ċedietx tal-kripta?”

KB: “Le, qatt ma ċediet. Le, ma ċedietx l-ar – l-art ma ċedietx.”

VD: “Ma ċedietx. And there was no collapse whatsoever.”

KB: “Not at all.”¹⁵

8. Testimony of Perit Danica Cachia Mifsud

Perit Cachia Mifsud gave the most extensive evidence in the case, across four hearings. At the hearing of 22nd September 2025, she was shown and asked to explain two photographic documents produced by her lawyers and marked DCM1 and DCM2, dated respectively to September 2020, more than three years before the events reported by The Shift. Introducing the first document, the following exchange took place:

[AP]: “...dan huwa l-ewwel dokument, immarkat DCM 1, u hawnhekk hawn miktub li dawn huma ritratti meħudin f'Settembru 2020. Tispjegalna ftit ... x'qegħdin naraw?”

[DCM]: “Iva, dawn huma ritratt li, kif qed tghid sewwa int, huwa Settembru 2020, jiġifieri meta x-xogħlijiet kienu għadhom ma bdewx, jiġifieri lanqas kellna kuntratt iffirmit tax-xogħlijiet li kellu jsir fil-kripta.”¹⁶

Turning to the second document, showing the same investigations from a wider vantage point, she testified:

¹⁵Transcript of Conduct Hearing held on 22/09/2025 (Konrad Buhagiar) – 25.00 – 26.59.

¹⁶Transcript of Conduct Hearing held on 22/09/2025 (Danica Cachia Mifsud) – 0.00 – 0.59, re Document DCM1.

“Now, the purpose of the second document is basically showing the same – the same period – so it's still September '20, but these are more zoomed out, if you like, images, to show the context of the localised investigations within the crypt.”¹⁷

These photographs showed localised depressions in the *ciangatura* and the discovery of a previously unrecorded grave, all pre-dating the raised-flooring works. Explaining the technical cause of the movement subsequently observed in 2024, and why she did not consider it a structural settlement, she testified:

“It was minor movement of the ciangatura, I would say, which was then ... resulted due to voids in the fill below, inconsistencies in the fill itself. And we also mentioned that when we did the remedial works, we found that the fill was in ... not compacted well, it had remnants of pieces of materials, we found glass bottles and so on. Jigifieri, no wonder that happened. It wasn't considered a settlement. 'Cause when you say settlement, qisu, it's settled, but in truth, what there was an opening, and, and in very localised positions, it wasn't throughout.”¹⁸

She testified that the change between the tender-stage and final structural drawings for the raised walkway (a reduction in its height) resulted from a later decision to omit a mechanical ventilation system in favour of natural ventilation, and was unconnected to any incident on site.

Regarding the events of 2024, she testified that the temporary steel structure used to install the permanent raised walkway was found, upon survey, to be misaligned and not correctly set out – a setting-out and levelling problem with the temporary works, not damage to the historic floor or structure – and that the contractor was accordingly instructed to stop work pending a method statement for the realignment. Directly asked, in light of the newspaper reports, to confirm her position on whether the Bartolott Crypt had suffered any damage or collapse, the following exchange took place:

¹⁷Transcript of Conduct Hearing held on 22/09/2025 (Danica Cachia Mifsud) – 3.00 – 3.59, re Document DCM2.

¹⁸Transcript of Conduct Hearing held on 18/05/2026 (Danica Cachia Mifsud) – 00:11:00 – 00:12:59.

[AP]: “Il-pożizzjoni tagħkom, jekk qed nifhem sew, hija li fil-verità hemmhekk ma kienx hemm ħsarat.”

[DCM]: “Eżatt, hekk hu.”

[VD]: “Ma kienx hemm kollass.”

[AP]: “Jiġifieri intom kontu sibtu sitwazzjoni u indirizzajtuha bil-kunsens tal-SCH u tal-klijenti tagħkom.”

[VD]: “Hekk hu.”¹⁹

When her position was put to her in summary form by counsel, she categorically denied any professional negligence:

[VD]: “Żgur qegħdin niċhdu qualsiasi neġligenza professjonali, qed niċhduha kategorikament.”²⁰

Perit Cachia Mifsud further testified that a representative of the Office of the Ombudsman, Perit Alan Saliba, had conducted a site visit and held a meeting with AP Valletta, the Foundation, and Mr Kurt Farrugia (CEO, SCH) to examine the allegations reported by The Shift, and that Mr Farrugia had confirmed to the Ombudsman's representative that the SCH had been aware of and had approved all works and method statements throughout. Asked to confirm the outcome of that inquiry, the following exchange took place:

[VD]: “Ma kien hemm ebda każ ta' neġligenza min-naħa tal-periti. Naqblu?”

[DCM]: “Ma kienx hemm każ ta' kollass. Le, ma, le, ma tkellimx fuq, l-etika.”²¹

¹⁹Transcript of Conduct Hearing held on 15/06/2026 (Danica Cachia Mifsud) – 00:20:00 – 00:20:59.

²⁰Transcript of Conduct Hearing held on 15/06/2026 (Danica Cachia Mifsud) – 00:21:00 – 00:21:59.

²¹Transcript of Conduct Hearing held on 15/06/2026 (Danica Cachia Mifsud) – 00:24:00 – 00:25:59.

9. The Shift's reporting assessed against the evidence

Considered against the sworn testimony summarised above and the contemporaneous documentary record – including AP Valletta's own correspondence with Camray, E&L, and the SCH at the material time, none of which was prepared in anticipation of these proceedings – the Council finds no evidentiary support for the central claim of The Shift's 18th January 2025 article, namely that the Bartolott Crypt floor “caved in” or “collapsed”, or that this caused damage to the burial chambers of the Knights interred beneath it. The evidence establishes instead a pre-existing, decade-old condition of localised settlement and misalignment in the historic *ċangatura*, arising from voids and loose fill beneath it, which was identified in the course of the works, reported without delay, and remediated in a manner approved at every stage by the Superintendence of Cultural Heritage.

It is, moreover, material to the question of professional responsibility that the movement in the *ċangatura* was first identified and reported on 28th February 2024 while the contractor was still setting out and levelling the temporary steelwork used to position the raised walkway – that is, before AP Valletta's completed design, the permanent structure bearing on grout pads sized to reproduce the historic loading on the *ċangatura*, had been implemented or come into operation. The condition observed was accordingly a manifestation of a pre-existing defect in the historic fabric, and not a consequence of the design for which AP Valletta, as the periti responsible for the project, bore professional responsibility. On this basis, the Council finds no causal link between the design prepared by AP Valletta and the settlement that occurred.

Decision

The Council of the Kamra tal-Periti reviewed all the evidence gathered during the investigation and the testimony of the parties, and proceeded to make its final determinations during Council Meeting 26.21 held on 15th June 2026. The following Members were present:

Perit André Pizzuto (President);
Perit Iyvynne Gixti (Honorary Treasurer);
Perit Julian Thompson (Honorary Secretary);
Perit Paul Dalli;
Perit Elaine Genovese;
Perit Sebastian Grima;
Perit Lino Micallef;
Perit Malcolm Xuereb.

The Council reviewed all the evidence gathered during the investigation and the testimony given at the hearing, and made the following considerations:

1. The Council found no persuasive evidence, whether documentary or testimonial, that the Bartolott Crypt floor collapsed or caved in at any point, or that any damage was caused to the historic fabric of the Crypt or to the burial chambers beneath it.
2. The localised settlement of the *ċangatura* observed in early 2024 arose from pre-existing conditions – voids and poorly compacted, historically disturbed fill beneath pavers that were already cracked and uneven, as documented as far back as the 2014 Restoration Method Statement, roughly a decade before the respondents' involvement in the remedial works – and not from any act or omission of the respondents. The settlement was, moreover, identified while the temporary steelwork was being set out and levelled, before AP Valletta's completed design had been implemented or come into operation; there is accordingly no causal link between the design for which the respondents were professionally responsible and the settlement that occurred.

3. The respondents acted with due diligence and transparency throughout: the issue was identified promptly, reported to the client and the Superintendence of Cultural Heritage without delay, and remediated by way of a method statement developed in consultation with, and formally approved by, the Superintendence at every material stage, under continuous archaeological monitoring.
4. The allegation that the respondents were warned in advance that the raised-flooring structure was too heavy for the underlying chambers, and proceeded regardless, was not supported by any witness who testified under oath, nor by any document produced during these proceedings.
5. No evidence was produced of any breach of a Directive issued by the Council under Article 12 of the Periti Act, Cap.622, nor of any other failure to comply with regulations respecting professional standards or practices.
6. The Council places on record its concern that The Shift's article of 18th January 2025, which prompted this investigation, described the matter in terms – “caved in”, “project in collapse”, “severe damage” to the resting place of some 600 Knights – which the totality of the evidence gathered over eight hearings and more than a year of proceedings does not support. The Council considers this reporting to have been materially misguided, and regrets the reputational harm and professional cost thereby occasioned to the respondents, who have been shown to have acted diligently and in good faith throughout.

After making the above considerations, the Council proceeded to make the following determinations in respect of Perit Danica Cachia Mifsud and Perit Konrad Buhagiar:

a. Dishonesty, misconduct, or gross negligence in the exercise of the profession

The Council finds each of the respondents not to have been in breach of this provision, by eight (8) votes to nil (0), with no abstentions.

b. Conduct discreditable to the profession

The Council finds each of the respondents not to have been in breach of this provision, by eight (8) votes to nil (0), with no abstentions.

c. Failure to comply with regulations with respect to professional standards or practices

The Council finds each of the respondents not to have been in breach of this provision, by eight (8) votes to nil (0), with no abstentions.

d. Breach of a Directive issued by the Council

The Council finds each of the respondents not to have been in breach of this provision, by eight (8) votes to nil (0), with no abstentions.

Having found no breach on any of the four aforementioned heads, the Council determined that no disciplinary sanction is warranted against Perit Danica Cachia Mifsud or Perit Konrad Buhagiar, and that this case is hereby closed.

The Council further reiterates its concern, expressed above, regarding the accuracy of the media reporting which gave rise to this investigation, and trusts that this decision – reached after a thorough and lengthy examination of the sworn evidence and documentary record – will be reported with corresponding diligence.

A handwritten signature in blue ink, appearing to read 'Perit Andre Pizzuto', is written over the printed name and title.

Perit Andre Pizzuto
President