



Position Paper & Comments on the Draft Brief Management Plan for Il-Park Nazzjonali tal-Inwadar

30th March 2016

Introduction

The Government published a Management Plan Brief for the Il-Park Nazzjonali tal-Inwadar Park (referred to as management plan), intended to be established along the coastal and rural area bordering ix-Xgħajra, Haż-Żabbar and Wied il-Għajn local councils. The park aims to increase an understanding of the inter-relationships that exist between natural environment, history and cultural identity and their role in promoting healthy communities and alternative, sustainable economic practices¹ on Malta. Sustainable activities will bring together society, including the farming community and local residents, to raise public awareness for the value of the environment within the park boundaries.

The region is of significant environmental importance, not least because of the nine identified bird species regularly present in the region which are recognized as particularly threatened under the Birds Directive. The Park Management alongside with the Government of Malta is responsible to ensure their survival and to conserve their territories and habitats in a sustainable manner.

BirdLife Malta supports the intention to establish the Il-Park Nazzjonali tal-Inwadar Park. It will provide an important opportunity for Malta to tackle serious environmental damaging challenges/problems in the region, to step up against threats to nature protection and to promote cooperation amongst national stakeholders and rights-holders. This will require a clear definition of the park governance structure and management responsibilities, guidance for sustainable economic practices with regards to native species including birds and an integrated approach to eliminate man-induced disturbance caused by hunting, trapping and off-roading.

BirdLife Malta considers favourably the proposal for to establish this park, furthermore after having jointly addressed the need for the designation of a National Park in the South of Malta as per a letter sent to the Prime Minister on the 23rd December 2014 by BirdLife Malta, Din l-Art Helwa, Nature Trust Malta and Flimkien Għal Ambjent Ahjar².

BirdLife Malta however does not support the establishment of the park as a compensation for the uptake of Outside Development Zone (ODZ) land to develop the Zonqor area into a university, when ample alternative spaces can be utilized to enable this development. BirdLife Malta supports the Front ODZ movement in opposition of this particular development.

¹ P. 44

² <http://new.faa.org.mt/proposal-for-south-park/>



The following paper highlights some of our concerns which are not addressed in the Management Plan Brief, as well as provides recommendations for further consideration when it comes to the eventual management of the park. These are summarized in the final section entitled 'Recommendations'.

1. Significance of Importance to birds and other fauna

The region of Il-Park Nazzjonali tal-Inwadar Park, generally faces widespread environmental degradation and the access to habitats for important bird species is limited due to several reasons, including extensive waste disposal particularly over the past two decades and increased human recreational activity.³ Table 5 (page 31) points out incorrectly, that "Species of European Community Interest are not known in the park area [...]". At least nine important bird species of European Community Interest have been identified from the area these including land birds such as the Short-toed Lark *Calandrella brachydactyla* which is reported as breeding in the area; and migrant birds such as the Stone Curlew *Burhinus oedicephalus*. The coastal areas of the park are known to be frequented by various species such as the Common Kingfisher *Alcedo atthis*, the Scopoli's Shearwater *Calonectris diomedea*, the Black Tern *Chlidonias niger*, the Audouin's Gull *Larus audouinii*, the Slender-billed Gull *Larus genei*, the Mediterranean Gull *Larus melanocephalus*, and the Yelkouan Shearwater *Puffinus yelkouan*. These birds are in need of special treatment, since they face significant threats because they are:

- In danger of extinction;
- Vulnerable to specific changes in their habitat;
- Considered rare because of small populations or restricted local distribution;
- Requiring particular attention for reasons of the specific nature of habitat.

The site also has various other plant and fauna species which are guaranteed protection within the Maltese Islands and which are also commonly found in various rural areas of the Maltese Islands, nonetheless from the Nwadar Park. These are species of European Community Interest and also require designation and protection. An account has to be taken of the impact of public access, human interaction and future activities in the management plan with respect to these species.

2. Disturbance

Natural as well as human-caused disturbances within the park are not sufficiently recognized in the management plan or planned to be mitigated. The current use of the site is dominated by agriculture, agriculture-related structures, and livestock farming in the north western part of the park area.

Conflicts of interest will arise between the core objectives of the park (e.g. Objective 1 "to value our environment in its natural form", objective 2 "to be a model of environmental regeneration"^[1]) and disturbance caused by human activity in the areas. Current activities which are considered as being a source of disturbance include hunting, trapping, dog-walking and off-roading activities to name a few.

³ P. 19

^[1] P.44



Such activities do not add value to the park, and the park should be considered as an opportunity to eliminate, mitigate and minimise such disturbance as much as possible. These should also include adjusted agricultural practices to allow the possibility for ground and low-vegetation nesting birds to breed during spring season, especially species such as the Short-toed Lark, Spectacled Warbler and Zitting Cisticola.

The management plan does not specify whether the park shall have any specific carrying capacity and it remains unknown whether the development of the American University of Malta, which is located on the western boundaries of the park, will have long-term disturbing impacts in the area. This has to be considered intensively in the site description chapter. Moreover, with an intense density of people accessing and interacting close to the park (e.g. students, university employees), the level of disturbance may need to be better controlled.

Measures to decrease light pollution should also be considered within the confines of the park, especially to help preserve the natural state of the area and provide a good contrast to lit urbanized areas. Given the coastal areas are also recognized as being utilized by some species of seabirds that are very sensitive to light pollution, keeping light pollution to a minimum should be also an objective of the management plan brief.

3. Bird trapping and hunting activities

BirdLife Malta has noted the position announced by government that hunting and trapping will be allowed once the Nwadar Nature Park is declared. BirdLife Malta considers these activities as being damaging to the environment and as not being compatible to the general enjoyment of the public for the area.

As mentioned briefly in the previous section, besides also causing unnecessary disturbance, especially if hunting seasons are allowed in spring, hunting and trapping activities directly decimate birds which may make use of the area. As communicated in a Press Release issued on the 15th March 2016⁴, BirdLife Malta maintains that "Nature Parks should be living museums where the public can experience and enjoy nature. Allowing hunting and trapping in these areas contradicts drastically with the concept of a nature park. Hunting and trapping take away nature, and never supplement it. During the hunting seasons very few people will be able to enjoy the park and will be barred from walking freely because of hunting and trapping.

We very much recommend that the decision to allow hunting and trapping in the park is revised, especially that concerning the use of public spaces or public land for these activities which conflict directly with the common interest of all sectors of society to enjoy the park area undisturbed and unhindered. As currently allowed by the Conservation of Wild Bird Regulations, hunting (and trapping) may be practiced in all sections of the park, including from the dirt road that stretches along the coastal area within most of the park, owing to its definition as a secondary road. At the very least, entire sections of the park should be added to the list of Bird Sanctuaries in order to minimise conflicts. Other measures which have been proposed including a hunting curfew as is currently in practice in Majjistral Park. The practicality of such

⁴ <http://birdlifemalta.org/birdlife-malta-reacts-to-decision-to-allow-hunting-and-trapping-in-nwadar/>



measures is however limited, given the fact that all the park premises are practically open to hunting, and consequently disturbance which may be damaging even if for a limited period during the day.

4. Governance structure of the park

In chapter 5 “National Parks and area management in the Maltese Islands⁵”, the management plan points out the tasks of the management board which range from responsibilities with regards to tourism and local recreational to environmental related issues, especially conservation. Four national environmental NGOs – (1) Gaia Foundation, (2) Birdlife Malta, (3) Nature Trust Malta, and (4) Din l-Art Ħelwa - are mentioned to be responsible for important conservation sites on Malta, followed by three management structures – (1) Government-led action, (2) Delegation to a NGO, and (3) Management Board - currently in place.

Although those options for a shared decision-making management stated out alongside with potential NGOs as representatives of parks on Malta, it is not clear which management structure by which partners will be put into place for the park management. Birdlife Malta agrees to the management model proposed to delegate the management of the park to an environmental NGO. This NGO should have solid experiences in managing natural heritage sites and the implementation of combining nature conservation with tourism activities within nature parks on Malta to prevent conflicts of interest between conservation and the impact of recreational activities. A detailed management plan including a budget to justify the future implementation of proposed activities needs to be provided for public viewing. BirdLife Malta recommends to publish all consultations carried out to date with involved parties to increase transparency and public participation in the decision-making process.

Birdlife Malta supports the “Proposed Organisational Chart” by Din l-Art Ħelwa as a model for a governance structure for the proposed park⁶.

5. Sustainable economic practices

In Section 8 on Objectives and Priorities, the brief mentions sustainable economic practices as an objective. These are however not very well defined, and it is unclear whether these are referring to agricultural activities or otherwise. Many human economic activities may be termed sustainable but may not necessarily add value to the park or improve its natural state. It is recommended that such an objective is clearly defined with the common interest of promoting practices that support the park and not create more conflict.

6. Awareness raising objectives

Raising public awareness for sustainable agricultural practices, biodiversity and nature conservation is mentioned several times in the management plan. BirdLife Malta believes that this is essential for the nature park to be sustainably used and recognized as an important conservation area by society. However, the actions of how this issue is being tackled are not very well defined.

⁵ P. 39

⁶ Petra Caruana Dingli and Martin Galea (2016): The Future of Nature Parks in Malta. P. 28. The Today Public Policy Institute, Malta.



A clear understanding of how awareness will be increased once the park has been established considering the current usage of the site needs to be defined. A lack of awareness of cultural and natural resources value in the region has been identified, however, it is pointed out very vaguely how this status will improve mid-term and long-term.

7. Use of agriculture land and live-stock farming

The specific use of agricultural land or the re-activation of farming practices in the area where these may have been abandoned in the past need to be better defined. It is recommended that the park takes on a sustainable approach to farming which is less intensive and less impacting on the natural environment. It is unclear at this stage whether the park shall be promoting organic agricultural practices. The park may also take the opportunity, with the active involvement of NGOs such as BirdLife Malta to revise the current and future farming practices in the area, such that these are rendered more environmentally and bird friendly. Simple measures such as the construction of nest boxes along abandoned buildings, or better awareness on farmland bird species that may utilize farmland as breeding habitat, can make a huge difference to breeding birds, as well as help increase the diversity of species that inhabit the area. These may include simple measures such as delaying the harvest of certain crops for ground-nesting birds, or minimizing disturbance in cow farm areas at certain periods of the year which could allow for the establishment of birds like Barn Swallows. High buildings close to the park may also be adapted to accommodate species such as the Common Swift and Pallid Swift which are ever-increasingly taking to urban as well as coastal areas in the Maltese Islands.

8. Off-roading

Limits to off-roading within the park are likewise not well defined, and we suggest that every opportunity is taken to limit vehicle entry within the less disturbed paths or dirt roads, in a manner that the park would promote access by foot or bicycle rather than by motorized means. This complements a drive for a more active lifestyle of benefit to visitors to the area but as well as to residents of the nearby towns who might feel more compelled to visit a neighbouring park which is free from traffic.

As is evident on the site, vehicle access to the areas within the park has allowed for the transport of various materials that have been dumped in coastal areas. Limiting access to the park will attenuate the probability of further dumping, in line with the objectives of the park.

9. Caravan use

The Management Plan Brief mentions on Page 25 that the use of caravans within the site requires further assessment. We note that this activity has been taking place in the area illegally for a number of years, and the park should not be promoting such initiatives. These conflict with various objective of the management plan brief, as well as provide the possibility for a mushrooming of caravan sites as has been the case with other areas in Malta notably Armier, Bahar ic-Caghaq and Ghadira.

10. Alien species and their replacement

The management plan brief makes reference to the removal of alien species in several sections of the report and as objective 2.5 which details that such removal should only be in public areas. This measure is



not effective enough as in most cases alien species are very proliferous and spread easily from one site to another. Accordingly the plan should secure the removal of all alien species from all areas within the park including privately-owned areas. This especially applies to invasive alien plant species which propagation is prohibited by law. Incentives should be provided in the form of indigenous saplings to allow the replacement of such trees where these may have some decorative, shelter or other utility in privately-owned areas. Overall this measure would help the park in restoring natural wooded areas.

11. Development and enforcement

The management plan brief does not specify what kind of future developments maybe permitted within the park. Although any form of development is subject to various legislation and policies, the park should define a clear policy on what will be permitted or otherwise. As is clearly explained, the park area has been subject to a multitude of enforcement notices that are mostly related to farming or agriculture-related developments. This is often the case for many areas across the Maltese countryside which see the transformation of small rooms or dwellings which are originally purely for the purposes of agriculture being transformed into residences, boat houses or hunting and trapping bunkers with little or no control. The management plan for the site should clearly lay a policy to prevent further abuse of this sort of activity.

Moreover every opportunity should be undertaken to regularize the situation with the currently pending enforcement notices which have probably never seen any form of remedial action. Illegally developed structures should be effectively and within a definite timeframe be acted upon, at the expense of the person utilizing such structures, such that there is a clear statement and policy adopted by the park that no illegal development shall be tolerated.

Consideration should be given to the allocation of enforcement officers to tackle such matters, where human resources to effectively tackle this problem may be lacking from enforcement authorities such as MEPA or the now ERA. Added function could be given to these roles in the form of green wardens who would also patrol the park area as a form of park rangers to report and counter any illegalities that may arise – be it offroading, illegal hunting and trapping, dumping of waste material, etc.

12. Priorities vs short term priority actions

Chapter 8.2 of the management plan describes priority actions for the park to address the six objectives of the park. In total, 28 priority actions are pointed out with short-term, mid-term and long-term effects to the park. Further down in the document⁷, priority is then given to only three actions - (1) the engagement of local communities, (2) co-operating with the local agriculture community, particularly aiding capacity to tap EU funds, and (3) action to halt illegal dumping. This section needs further clarification, in the sense of providing a reasonable and detailed explanation of why it has been decided to give special priority to the above mentioned actions.

⁷ P. 53



13. Eligibility of funds

BirdLife Malta notes the intention for the park management to access EU funds that will aid the management of the site in line with the objectives for the park. As a NGO who has experience in this field, especially LIFE+, NGOs like BirdLife Malta should be involved to lend their expertise and experience in the interests of better management of the natural resources that the park offers.

Conclusion

BirdLife Malta supports the general visions and objective of the *Park Nazzjonali tal-Inwadar* taking exception of certain measures (such as hunting and trapping) that will be allowed within the park, which in the NGO's opinion conflict directly with the general idea of having a Nature Park. The management plan brief requires further defined objectives and a clearer governance structure and we support the delegation of the management of the park to a local or a group of local NGOs. Given the current challenge faced with developments outside development zones (including the current controversial issue of the American University) the park management should include a clear policy on the future of developments within the park area. We support further consultations with the public as well as NGOs to be made in time and in full consideration of the common interests of the public and especially the need to have natural areas for the benefit of nature and people.

Summary of recommendations made by BirdLife Malta

- To revise all references to EU Species of Community interest so that these are addressed by the management brief
- To take into account the increasing disturbance caused by various human recreational activities (such as caravan-use and off-roading) and future developments next to and within the area of the park
- To ban bird trapping and hunting within the confines of the park and secure such ban within the legal framework defining the park
- To preserve all species of significant environmental importance irrespective of whether they are protected or not
- To support the "Proposed Organisational Chart" by Din I-Art Helwa as a model for a governance structure for the proposed park
- To define what sustainable economic practices will be allowed in the park
- To explain further in what manner awareness of the cultural and natural heritage will be raised
- To promote a sustainable approach to farming and agricultural practices with the view of making existing practices environmentally and bird friendly
- To restrict further vehicle access and promote access by foot or bicycle
- To provide a detailed management plan with clarification over responsibilities of identified stakeholders, priority actions, and budget availability
- To extend the management of alien species not only in public areas but also in private areas of the park
- To define what future developments will be allowed and to address all enforcement notices by sufficient enforcement resources
- To clarify the difference between priorities and short term priority actions
- To publish all consultations carried out to date with involved parties to increase transparency and public participation in the decision-making process