



Recommendations for the National Strategy for the Environment & its Vision for 2050

We welcome Malta's intentions to draft the National Strategy for the Environment & its Vision for 2050 and would like to use the opportunity to provide our recommendations that reflect our environmental vision to conserve wild birds, their habitats and biodiversity, as well as working with people towards sustainability in the use of natural resources in Malta to ensure a natural legacy is left for the next generations.

Draft strategic objectives of the national strategy and our recommendations:

<p>Ensure a better and sustainable quality of life</p> <ol style="list-style-type: none">1. Ensuring that the Natura 2000 network of protected areas as the cornerstone of conservation in Malta is effectively managed and safeguarded<ul style="list-style-type: none">• By updating and finalizing management plans for all terrestrial and marine Natura 2000 sites and ensuring the implementation of such plans for all sites in a participatory approach and according to defined timeframes with the aim of achieving a favourable conservation status for all listed species and habitats• By reviewing opportunities to deliver specific actions defined by existing management plans for protected sites that are currently unmanaged and ensuring that these actions are implemented• By reviewing currently unmanaged sites, both terrestrial and marine, in order to identify stakeholders that are able to manage these sites in partnership with relevant stakeholders• By undertaking further research on Special Areas of Conservation, including Il-Qortin tal-Magun u l-Qortin il Kbir, Ta' Isopu (Gozo) and Il-Ponta ta' San Dimitri to Wied il-Ghasri (Gozo)• By transforming and extending current Special Areas of Conservation into Special Protection Areas if breeding population threshold can be confirmed, including site 22 Il-Gzejjer ta' San Pawl (Selmunett), site 29 Il-Qortin tal-Magun u l-Qortin il Kbir, site 24 Rdimijiet ta' Malta: Ir Ramla tac-Cirkewwa sar Ramla tal Mixquqa and colony sites at Cumnija and Majjistral (these could qualify as sites for the network of SPAs in Malta)• By continuously monitoring and assessing all Natura 2000 sites, in order to ensure the boundaries of these sites are fit for purpose, and where necessary to extend them.2. Restoring degraded ecosystems to full functionality and ensuring that restoration processes are in place<ul style="list-style-type: none">• By identifying key habitats (e.g. coastal wetlands, Mediterranean woodlands, garrigue) and sites to prioritise for restoration• By ensuring that actions are identified and implemented to restore these identified sites• By prioritizing restoration initiatives on Comino as the continuation of currently planned assessments and environmental objectives• By promoting the restoration of disused quarries in a sustainable and integrated way and by providing alternative development plans that support the natural environment
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3. Providing accessible green spaces

- By clearing the countryside from inappropriate signs and indications that deny the access to public paths and sites
- By prioritizing and supporting stakeholder's interests who interact with nature in a sustainable and benefitting way
- By increasing natural areas in Malta e.g. by restoring abandoned build sites to their natural state and by providing opportunities for urban and community gardens with the support of functioning restoration initiatives
- By designating appropriate sites applied for as public domain

Provide clear and long-term direction for our environment

1. Protecting Malta's breeding and migratory species

- By providing support to develop control programmes for invasive species (depending on the location e.g. rats, feral ducks, feral cats and plant species) in other sensitive areas, especially in relations to breeding birds. Further research is needed to investigate potential impacts of pigeons and gulls on protected species.
- By accurately conducting long-term monitoring and reviewing each breeding event on a case-by-case basis and providing support to carry out specific conservation actions
- By expanding bird sanctuary/nature reserve areas as counter measures to the vast expanses of land where hunting and trapping is allowed
- By creating connected green corridors

Set out national environmental targets

1. Monitoring migratory birds and directly protect them from illegal extractive practices (i.e. hunting and trapping)

- By closing harmful derogations to the Nature Directives such as the unsustainable practices of bird trapping and hunting in spring from the Maltese Government
- By stopping further attempts to derogate from the Birds Directive and ensuring that the Directive is fully implemented
- By promoting and developing overarching research programmes, strategies and guidelines based on best-practice
- By developing monitoring mechanisms to keep tabs on illegal killing of birds in cooperation with local stakeholder and, ideally developing a community-based monitoring system
- By strengthening enforcement of environmental laws and transfer these to the remit of ERA, including bird protection regulations
- By developing a wildlife crime unit within the Malta Police Force

2. Environmental education opportunities for children, young people and adults are improved to connect with nature and empowering them to make environmentally responsible decisions

- By increasing green school grounds to allow more opportunity for learning outside the classroom
- By ensuring that all new schools are designed to have green space and by developing a transforming scheme to provide existing schools with access to green spaces for outdoor learning
- By providing more teacher-training opportunities on a national scale, including secondary and university level

Integrate and synergise efforts of all policies and stakeholders who directly or indirectly influence the state of our environment

- All urban and rural productive activities and developments are integrated with conservation and respect traditional landscapes
- By establishing that recommendations from ERA have more weight during decision-making and by giving ERA the option to veto against planning applications after examining their potential environmental impacts
- By monitoring that initiatives proposed in sensitive areas go through the appropriate assessment procedure and by stopping harmful developments in the early stages of the application process
- By taking a precautionary principle approach in advising against any form of development in Natura 2000 sites, while being sensitive to buffer areas to these priority sites
- By listening carefully to and taking into account the recommendations from environmental organisations on urban and rural development proposals that are applied for with the governmental authorities and by providing feedback on these public consultations to the stakeholders with regard to the extent their recommendations were considered
- By properly monitoring mitigation measures and permit conditions during construction and operational phase of proposed developments
- By conserving and promoting traditional landscapes, and engaging stakeholders in environmentally friendly productive activities that maintain an abundant and diverse range of habitats and wildlife (e.g. organic agriculture, high nature value farming, ecotourism)
- Better environmental policy integration in the fields of transport and infrastructure
- By adopting a national light pollution policy scheme to minimize light pollution and corresponding threats to the natural environment
- By revising, improving and adopting maritime policy and legislation with a view of reducing disturbance to seabirds and other protected species. This is particularly important during the seabird breeding seasons, when such birds are most susceptible to boat-based disturbances of light, noise and air pollution generated by fumes
- By better controlling air pollution generated at and setting up reduction measures, such as officially supporting the designation of the Mediterranean Sea as a combined SECA and NECA by 2020 and recommending to put a strong focus on the reduction of air pollutants emitted from ships in territorial waters
- By providing safe bicycle lanes, outdoor walking routes, picnic areas, camping sites and other outdoor infrastructures to provide opportunities for people to enjoy Malta's natural areas in a sustainable and regenerative way
- By ensuring that the transport network is not damaging the natural environment
- By strongly integrating socio-economic growth with environmental objectives

Address the main environmental challenges Malta is facing

Conservation of birds:

Although an ecosystem approach is generally recommended for conservation initiatives, the situation in Malta requires actions that specifically target sensitive species. For the conservation of birds, the importance of Malta in the Central Mediterranean Flyway offers an exceptional opportunity to observe

and study migrating birds, which needs to be recognized for its added biodiversity value to our islands. Additionally, it is worth mentioning as a major challenge, that besides hunting, migratory birds face countless dangers: destruction and degradation of habitats, loss of critical stopover sites such as coastal wetlands, illegal killing, poisoning, pollution, and collisions with badly-sited infrastructure like power lines and lit-up sites along the coast leading to intense light pollution. Sectors that affect migratory birds the most are agriculture, energy, hunting, tourism and waste management. As a separate point, we would like to highlight that BirdLife Malta staff has encountered the threat of seabird casualties as a result of illegal hunting at sea.

Invasive alien species:

The problem of invasive species and the need to control them – especially with respect to the impact caused by rodents at various seabird colony sites – is a threat that needs immediate and long-term attention at sensitive sites. While sites such as Rdum tal-Madonna SPA remain controlled, various other sites such as newly discovered seabird colonies require attention. The need to setup rodent control plans at various SPA sites in the long term will need to be addressed in the coming years accordingly. In connection to discharging or unloading waste and increasing tourism on Malta especially at remote and sensitive sites the pressure of invasive alien species has become more intense and will increase in the future; this needs to be tackled with a strategic approach.

Seabird bycatch:

It is estimated that at least 200,000 seabirds are accidentally caught annually in EU waters, including species on the verge of extinction. For the Mediterranean Sea, there is a sparse and low scientific data reliability of seabird bycatch that leads to governments not taking action on seabird bycatch. From our regional BirdLife partners, data is available that shows the critically endangered Balearic shearwater, and the vulnerable Yelkouan Shearwater and Scopoli's shearwater, are regularly caught in pelagic and demersal longline fishery. The lack of data for Maltese territorial waters needs to be tackled in order to assure that fishing techniques are sustainable and do not cause a threat to protected species. As for now, not a single EU Member States has a national programme that is collecting systematic data on seabird bycatch which should be included in national environmental targets in our view. Fishing is a planned activity that also takes place in marine Natura 2000 sites, whereas bycatching seabirds is considered a deliberate act under the Birds Directive - this means appropriate assessments should be carried out according to EU legislation to ensure that seabirds are protected especially in Marine Protected Areas and appropriate measures need to be formulated to ensure that fishing is not conflicting with the protection of the marine environment.

Gaps in controlling measures:

Electronic logbooks from fishing vessels do not have systems in place to record seabird bycatch, not all vessels have VMS – in particular small scale, and from our observations, inspectors generally do not control for seabird bycatch mitigation measures. This poses a threat not only to seabirds but also to other bycaught species in our waters.

Threat from marine litter

The impact of marine litter is widely documented in international studies and research projects with more recent research pointing to the problem of micro-plastic materials entering the food chain and accumulating within species at the top of the food-chain such as seabirds. While largely unknown,

every possibility should be expended to gather information about the severity and impact caused by plastic pollution on Malta's marine life. Concrete goals need to be formulated to eliminate plastics and micro-plastics entries into the Mediterranean especially from Malta's shores.

Marine Spatial Planning Process:

For a spatial plan to be effective there needs to be comprehensive data and modelling of habitats and species activity in the context of specific ecosystems. We recommend a review of the current available data and information to understand data gaps and what further data collection is needed. Mapping the sensitivity of threats and human pressures that species and habitats face in Malta's territorial waters enables the identification of the best places to allocate human activities. Some areas might already be designated as Natura 2000/ Marine Protected Areas such as fishing and aquaculture, posing potential threats to the marine wildlife. For seabirds, those areas were designated because of high congregation areas (colonies, foraging or rafting sites). However, the areas do not account for migratory flyways or for "foraging trips". Therefore, mapping the sensitivity to different pressures would enable to understand the impact certain activities might have on a population of seabirds that is not just breeding or rafting in the area, but also taking several foraging trips to feeding grounds. This includes for instance aquaculture activities with a focus on changing behavior of seabird movements. A marine spatial plan should propose an allocation of areas for different human activities depending on the least amount of ecological impacts, especially in MPAs. Before adopting a final marine spatial plan, a Strategic Environmental Assessment of allocated areas should be undertaken that determines the extent of the environmental impact of the plan and if needed, adjustments have to be made. Once a marine spatial plan has been adopted, permits for activities shall normally only be requested within these allocated areas. However, Appropriate Assessments (for Natura 2000 sites) or Environmental Impact Assessments (for other MPAs) are to be undertaken where planning permits have been requested and this can have a significant effect on any site integrity. Permits should then be given where Appropriate Assessments/Environmental Impact Assessments determine that these projects will not have a significant effect on the conservation objectives of the species and habitats (i.e. site integrity). The cumulative impacts of threats should also be a component of Strategic Environmental Assessments, Marine Spatial Plans, and Appropriate Assessments in order to take account of in-combination and cumulative effects of existing and proposed projects in the context of the current, already degraded status of the marine environment. In this regard, attention has to be drawn to the implementation of the Blue Growth Initiative and the Integrated Maritime Policy, initiated by the EU, which might cause conflicts among stakeholders with interests over the same region.

Planning process and planning applications:

The Maltese territory is suffering from significant pressures arising because of the fastest population growth in the EU. Besides having the highest population density in the EU, this is accompanied with the interest shown by the Maltese government to increase the population provided the economic growth is maintained.

Population growth leads to an increase need for accommodation, social and physical infrastructure creating pressures that have an effect on many people's physical and mental wellbeing. Likewise, overdevelopment has a tremendous negative impact on the biodiversity and the natural environment due to land uptake.

Among EU countries, Malta ranks fourth in terms of urban sprawl, also featuring the least proportion on land uptake per person. Natural areas are rare, and Malta's surface has been build up to a great extent (30% is artificially covered). Still, development permissions are increasingly converting pristine land into



covered one. Due to weak and poorly implemented policy frameworks besides a civic voice that is disregarded in decisions-making processes, many planning applications are approved adding on to urban sprawl and further up-take of natural areas.