



BirdLife Malta's recommendations on Conservation Objectives and Measures
for Malta's Terrestrial Natura 2000 sites
30 August 2021

As a reaction to the public consultation on the intent and objectives of the "Conservation Objectives and Measures for Malta's Terrestrial Natura 2000 sites", we would like to contribute with our feedback.

Contribute to maintain or restore, at a favourable conservation status, the natural habitat types and species of wild fauna and flora of community interest for which the sites were designated

- By regularly evaluating and revising (at least once in 5 years) the management plans for each Natura 2000 site to maintain FCS of the protected areas, relying on most up-to-date data regarding habitats and species dynamics
- By establishing an ongoing monitoring programme to keep track of any changes in the protected habitats and species populations, and amending the mentioned management plans accordingly, as well as updating and enhancing the Standard Data Forms

Reduce direct and indirect pressures and threats affecting the conservation status of habitats and species of community interest and hence their future prospects

- By mapping the anthropogenic pressures and threats each site is exposed to and working out feasible mitigation measures to reduce their impact. These shall be incorporated into the respective sites' management plans
- By establishing a network of buffer zones around the protected areas to minimise any adverse impact on the vulnerable natural environment. The major idea of buffer zones is to enhance and foster the conservation capacity of a protected area, or in other words, buffer zones are to insulate areas where the conservation of biological diversity is the primary aim. Buffer zones shall ensure proper implementation of the conservation objectives of a given protected area. Among other, it should be defined:
 - ◆ the appropriate schemes of land use and management of the areas adjacent to the scheduled protected sites;
 - ◆ the economic activities which pose a potential pressure on the protected areas and which shall be separately regulated within the buffer zone;
 - ◆ design considerations (specifically, the height) and nature of certain types of developments occurring within the buffer zone of the protected natural

territories which can lead to negative impact on the N2K sites;

- ◆ depending on the site, certain light and noise generating activities shall be limited;
- ◆ rural areas adjacent to the scheduled protected areas shall be granted a special consideration as such that are natural buffer zones. Any activities likely to cause degradation of the rural environment around the protected areas should not be favoured.

According to the Habitats Directive, all measures taken under the Directive must aim to reach or maintain a favourable conservation status, therefore buffer zones can be considered as a valuable asset towards reaching this goal.

Improve knowledge on and monitoring of habitats and species

- We recommend establishing of scientific research programmes to conduct research studies and provide scientific data to enhance the Standard Data Forms for each Natura 2000 site and fill existing data gaps
- Regular exchange of knowledge and information with the stakeholders is necessary for the efficient environmental monitoring, as well as relevant stakeholders engagement into the research activities
- Encourage and initiate projects aimed at closing data gaps with regard to various elements of Maltese terrestrial habitats and species (including, but not limited to LIFE projects) which shall also involve different stakeholders and contribute to knowledge exchange

Increase conservation and restoration efforts for pertinent habitats and species following a prioritised approach

The lion's share of Maltese Natura 2000 network is spread over the coastal areas which are recognised for their importance to seabird populations. Our interest here is mainly focused on the safeguarding of nesting sites of the 3 vulnerable seabird species: Yelkouan Shearwater (*Puffinus yelkouan*), Scopoli's Shearwater (*Calonectris diomedea*) and Mediterranean Storm-petrel (*Hydrobates pelagicus melitensis*). To contribute to their conservation status, we recommend taking simultaneous measures on land and at sea to protect these birds during their full life-cycle. The population of Yelkouan Shearwater has been decreasing over the last decade, and the species is classified as Vulnerable to extinction. Malta hosts about 10% of the global population of Yelkouan Shearwater and has to take feasible measures to contribute to the restoration of FCS of the species. In this view, we recommend:

- Granting further protection to St. Paul's Islands as a Special Protection Area as proposed

by BirdLife Malta under the Bird's Directive. The islands support a recently established colony of up to 70 pairs of individual birds which are expected to benefit from further protection (please see the attachment 1, 2)

- Considering the establishment of a SPA site at Il-Majjistral Nature History Park And Cumnija for Yelkouan Shearwaters (as also proposed by BirdLife Malta) – which areas is already designated as the Rđumijiet ta' Malta: Ir-Ramla taċ- Ćirkewwa sal-Ponta ta' Bengħisa (MT0000024) SAC (please see the attachment 1, 2)
- Taking measures to eliminate or minimize the pressures and threats the birds face, such as predation by rats, disturbance from recreational activities, light and noise pollution, loss of breeding habitat, illegal hunting. One of the biggest threats was proven to be predation of eggs and chicks by rodent species, namely rats. Despite the rat control programme implemented during several LIFE projects (LIFE Yelkouan Shearwater Project (2006 -2010), LIFE+ Malta Seabird Project (2011-2016) and LIFE Arċipelagu Garnija Project 2014 – 2020), rats remain a serious threat for the seabirds due to presence of litter on sites adjacent to the colonies. Efforts should be put to strengthen the enforcement of environmental legislation and paying more attention to setting of a viable waste management strategies and plans for the Maltese islands in general and especially for the sensitive protected areas
- Granting stricter protection to certain caves and cave systems which are valuable in terms of establishment of Yelkouan Shearwater (such as Għar Ħasan cave system located within the SAC/SPA Rđumijiet ta' Malta: Mix-Xaqqa sal-Ponta ta' Bengħisa). The additional measures can include limiting the access to the caves; restricting noise and light generating activities in close proximity to the site.

Manage activities within terrestrial Natura 2000 sites

- In order to guarantee that economic activities implemented by the private sector within Terrestrial Natura 2000 sites abide by the management plans, it is necessary to allocate a sufficient budget to cover all costs arising from managing the N2K sites, partly provided by the private entity and partly provided by the government in joint agreement
- The impacts related to the various economic activities could be as follows:
 - ◆ litter present on sites
 - ◆ disturbance from recreation activities (BBQs, camping, etc.)
 - ◆ light and noise pollution
 - ◆ unsustainable tourism
 - ◆ proximity of roads and development areas
- Nature Permit should be a required precondition for granting a permission to conduct any activities which can threaten the ecosystems and their elements within the N2K network. Besides other, this should include the authorisation for trapping on sites falling within the N2K sites. Trapping should not be favoured on protected habitats.

Ensure stakeholder involvement and cooperation among entities

- The responsibilities should be explicitly defined within governmental structures to avoid conflict of competencies where one authority is responsible for the management of the sites, ideally within the Environment and Resources Authority. To effectively implement the management plans and strengthen the enforcement on the sites, we strongly recommend allocating a sufficient budget on these needs
- A responsible management authority shall be appointed for each scheduled Natura 2000 site. Such a management body will be in charge of the implementation and revision of a pertinent management plan, overseeing the activities on the site, as well as monitoring of the protected habitats and species
- To avoid tension and conflicts amongst different stakeholders operating in the area of N2K sites, potential impacts, threats, and opportunities have to be identified and addressed. It has to be guaranteed from both, governmental side and private sector, that all planned activities will be implemented in close cooperation and consultation with the responsible management authority for N2K sites, at all times considering the sustainable management of Malta's Natura 2000 network and the importance to maintain and contribute to its FCS. The cooperation can be strengthened by actively involving non-governmental organisations and other relevant stakeholder into the implementation actions agreed upon under the sites' management plans and distribute responsibilities amongst involved stakeholders

Fulfil the obligations under the European Union Nature Directives, namely the Habitats Directive (Directive 92/43/EEC) and the Birds Directive (Directive 2009/147/EC) and related multilateral environmental agreements

In addition to the mentioned Directives, we would like to draw your attention to the importance of aligning with such policies and legal frameworks as:

- the EU Biodiversity Strategy
- EU Regulation 1143/2014 on Invasive Alien Species
- Bern Convention
- Convention on the Conservation of Migratory Species of Wild Animals
- Ramsar Convention