



BirdLife Malta's comments on the Guidelines
for Good Forestation Practices for the Maltese Islands
29 March 2022

BirdLife Malta has analysed the draft Guidelines for Good Forestation Practices for the Maltese Islands, and we welcome the general intent of the document prepared by ERA and appreciate such valuable and greatly needed efforts. We acknowledge a number of promising provisions, such as the general rule to promote native and archaeophytic species which are well-adapted for the conditions of the site and do not require extensive irrigation. The initiative to include shrubs species and the recognition of the importance of understory species is also very welcomed.

Technical remarks

Although the concept of ecosystem-based approach in principle is applied throughout the guidelines, we would like to suggest emphasising the importance of applying the mentioned approach as a very prerequisite of any restoration practice, in particular (for instance, under the section B *Project Design* and/or *General Codes for Forestation Practices*).

In the Section C *Project implementation* which lists the 'Other ways of improving the success of a forestation project', it would be useful to add a reference or a link to suggested good arboriculture practices.

Point vi (Section C, Maintenance) is dealing with the ruderal vegetation and its control. Specifically, it is proposed after the removal of vegetation to leave the organic matter on site unless there is a risk of fire. However, there might be other limitations apart from the latter, particularly it is known that some plant species tend to accumulate in their upper parts pollutants (heavy metals, radionuclides, etc.) present in soil, and when left on site after removal from the ground can cause soil re-contamination. Therefore, we suggest that ideally a soil survey should be conducted prior to taking a decision on whether the organic matter should be left or taken away from the site especially on sites where the risk of contamination is high.

It is highly important that to control redurals, grass cutting as opposed to soil tilling should be recommended in the *General Codes for Forestation Practices*. Apart from that, a point should be made clear in the General Codes section that special care should be taken when dealing with a proposal for planting in an area which falls under **Natura 2000**. Approval of a project in such a case should only be given if the planting is going to enhance the present habitats according to present status, data and previous surveys.



Further recommendations

- ❖ The project should aim to enhance or restore natural habitats and not to alter vulnerable habitats. The sites with existing and stable vegetational communities should not be considered for forestation, on the contrary ecologically compromised areas (unused/disused fields, former landfills and queries, degraded woodland etc.) should be strongly favoured for that purpose.
- ❖ We feel the need to stress once again that any interventions on **Natura 2000 sites**, specifically in terms of forestation, should be evaluated carefully at the very initial stage to avoid adverse impact on these protected areas. The present habitat should be retained and planting should only be done to enhance the existing habitat using the plant species appropriate in line with the Management plan for the respective site and its present status, and not risk turning the site into a forest (even when using indigenous species) altering the habitat.
- ❖ We would highly support the idea of forestation initiatives on the abandoned agricultural fields which would tackle both land abandonment and habitat loss. This should be done after thorough consideration though, not to compromise thriving agroecosystems which are vital habitat for a number of vulnerable species (like *Streptopelia turtur*). Agroforestry may be considered as an option. Due consideration should be given to current status of the area earmarked for afforestation, data on bird species breeding within the site, eg. species inhabiting extensive farming agroecosystems such as Corn Bunting, Short-toed lark, Spectacled Warbler can be adversely affected if their breeding site is planted with trees (as was proposed a few years ago for the area behind Golden Sands hotel which is one of the last breeding sites in Malta for the Corn Bunting).
- ❖ In addition to the ecosystem-based approach already mentioned above, we recommend including in the guidelines a concept of ecological corridors. Wherever suitable, forestation projects should contribute to connectivity of natural habitats on the Maltese Islands, creating green corridors throughout the areas - this would greatly contribute to the general integrity of the natural environment, given the level of current habitat fragmentation that characterises Malta.
- ❖ It is extremely important, prior to ERA's approval of a site to be used for forestation, to consult and make a good use of the available data such as Farmland bird status report, Breeding birds Atlas and data on Natura 2000 sites.



- ❖ Government initiatives could be directed to create a funding scheme aimed to encourage private ownership for new afforested areas; the scheme should target disused/abandoned agricultural land that could be converted to mixed Thermo-Mediterranean forest to increase forested area in the Maltese islands.
- ❖ An action also should be introduced for every Local Council in the Maltese islands to identify an area for afforestation/habitat restoration in every Locality, especially for highly urbanised localities including both government owned land and an incentive for private owned land. It is important to involve local councils (region councils) in the process of identification of areas favourable for forestation projects, as well as to engage the local authorities in management of such areas.
- ❖ To ensure success of the forestation project, considerations for supply of water for the first 10 years prior to commencing the project, ideally from a source within the forestation site or in close proximity to it should be considered to avoid relying on bowser water transportation to reduce carbon footprint and excessive water demands on other sites. An emphasis on the use of drought resistant indigenous species due to increase in extreme weather events linked to climate change.