



BirdLife Malta's comments on the Strategic Environmental Assessment on the CAP Strategic Plan for Malta for the programming period 2023-2027

26th August 2022

BirdLife Malta has reviewed the Environmental report on the mentioned SEA which is present online. Please find our feedback below.

First and foremost, it is important to state that although the report does mention such an important indicator as a Farmland Bird Index (FBI) when summarising environmental baseline data (Table 4.1), it does not refer to it in the section dealing with the SEA environmental objectives & indicators for assessing impacts (Table 5.1). Although the report states that the FBI for Malta is not available, it is not correct: in 2008 BirdLife Malta was subcontracted by the Ministry for Agriculture to establish a baseline for FBI for Malta; later in 2013, BirdLife Malta updated the FBI (please find both reports accompanying these comments). Furthermore, in recent years the Wild Birds Regulation Unit has commissioned the production of Breeding Bird Atlases in 2018 and in 2024, from which FBIs can be extracted as suitable indicators. It is presumed that the SEA process should lead to providing recommendations with regards to data gaps closure if the data is insufficient (which is the case for the FBI). In the scoping report, it is stated: “The SEA will assess the monitoring arrangements proposed for the CAP Strategic Plan and *may recommend incorporation of new indicators based on the relevant environmental issues, objectives, and indicators for the programming document.*” Using the FBI is an absolute must in terms of assessment of environmental impacts arising from the activities under the CAP SP as well as to have a more comprehensive monitoring of the SP implementation, therefore the SEA should include into the list of recommendations the need to update the FBI for Malta as an integrated part of the SEA monitoring process.

We also noticed that the table summarising the conservation status and trends for the different species assessments between 2013 and 2018 as per species group (Table 4.3) does not contain the avifauna species in it which is considered as a considerable gap, including in light of a FBI.

Furthermore, we believe that the proposed Monitoring Plan (Table 9.1) could benefit from adding the following monitoring parameters:

- SEA theme: Biodiversity, Flora and Fauna - the state of farmland birds (Farmland Bird Index);
- SEA theme: Landscape - number of projects resulting in a negative impact on landscape; the percentage of land uptake and land-use change in comparison to baseline data;
- SEA theme: Soil - indicators of soil contamination, including by pesticides, as well as the rate of soil loss comparing to the baseline data.



We would also like to draw your attention to the incorrect species identification when it comes to Scopoli's shearwater which is referred to as Cory's shearwater on pp.24-25.