



## **BirdLife Malta's comments on the Intent and Objectives: Malta's National Strategy and Action Plan for Pollinators to 2035**

13<sup>th</sup> March 2023

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Whilst welcoming the initiative to draft the National Strategy for Pollinators 2035, BirdLife Malta would like to submit our recommendations with respect to the Intent and Objectives of the mentioned Strategy as part of the public consultation process.

As formulated by ERA, the intent of the Strategy is “to act as the national framework that drives and promotes the safeguarding of pollinator species and their services through a number of short and long-term actions”. It would be beneficial to make the intent more tangible and clear, and instead of just “driving” and “promoting” the safeguarding of pollinators, it should create a strong and all-encompassing framework which will ensure the protection, and if necessary, restoration of local populations of pollinator species for them to reach favourable status and ensure the full range of relevant ecosystem services to be delivered. Due to scarcity of data, one of the most important primary objectives should be to address the scientific data gaps and formulate the SMART targets accordingly.

The proposed objectives include addressing the threats and pressures the pollinators are facing, yet, firstly, such impacts should be studied and evaluated locally. We recommend applying an ecosystem-based approach, as it is well-known that both pollinators and plants have been evolving in synergy, therefore the protection of the first is not possible without the good state of the second. Interlinks between different human activities and pollinators are to be further analysed as well, such as the correlation between the use of pesticides (and other unsustainable agricultural practices) and the status of pollinators, expansion of bee hives and possible competition consequences for wild bees populations, etc. At the same time, the lack of local data should not be used as a justification to further delay urgent actions, such as reducing the use of pesticides whose harmful impacts on pollinator species has long been a common knowledge<sup>1</sup>.

Clearly, the importance of protecting natural habitats hosting wildflower communities is crucial to safeguard pollinators, and such an objective should be given a priority in the Strategy. This means, particularly, restricting developments to the development zone as much as possible, avoiding impacts from trampling and off-roading, addressing illegal trapping, taking measures to support natural recovery of abandoned land

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<sup>1</sup><https://www.fao.org/documents/card/en/c/cc0170en>



(including agricultural land which is not used), addressing monoculture prevalence, ensuring stronger protection of rubble walls, etc. Apart from passive measures, in such a heavily urbanised country like Malta, is critically important to launch a nation-wide campaign with the aim to create and maintain wildflower patches in urban and semi urban areas (including on roof-tops), on the strips of land between agricultural fields and along the roads, as well as to adequately support, including financially, existing initiatives (such as the initiative by Malta Beekeepers' Association and the local councils which reached an agreement that no wildflowers would be removed from rural paths in spring). Small areas in localities which are usually referred to as part of "green" areas (such as flower beds in parks or at roundabouts), very frequently are not actually green areas but rather patches of open soil with cultivated plants planted on it: such an unsustainable practice is not only harmful to the soil (which is left exposed to erosion by wind and sun, contamination by runoff waters, car emissions and litter) but also does not contribute either to the state of pollinators, ambient air quality, or carbon sequestration targets. Such areas have a powerful potential to support biodiversity in localities, and the change of gardening practices will be beneficial for this purpose.

Additionally, we need to emphasise the importance of strengthening and supporting the transition towards sustainable bee-keeping practices; the impacts of the last on wild pollinators populations should be assessed, particularly in terms of food competition and genetic contamination. The latter is associated with the uncontrolled import of domestic honeybees from Italy and other countries, which basically means the introduction of subspecies potentially leading to adverse changes in genotype of local bee species. Such an urgent issue should be better understood and addressed in the Strategy.

A great deal of raising awareness about pollinators needs to also be expended with the various government entities that deal with the upkeep of parks or natural areas. We have too often seen the needless 'de-weeding' of afforested areas due to perceived fire hazards, which results in the obliteration of various ephemeral floral species that are vital for pollinators during winter, spring and early summer. Such practices need to be avoided as they are directly culling a food-source for pollinators, as well as depriving a potential seed bank for the proliferation of such species during the future wet seasons. Nature permitting regulating such activities especially within Natura 2000 sites needs to cater for such eventualities by specifying when pruning and weeding activities can be undertaken, rather than blanket yearly permits which leave this open to interpretation.

Further awareness raising activities need also be raised with the general public to instil an appreciation of local flora. Initiatives such as those undertaken by ERA in past years, where seeds of local flora were given to members of the public to grow at home, are



very positive initiatives that can bring about a change in mentality towards 'weeds'. Such initiatives should be supported as long as the source of distributed seeds is a local one.