



BirdLife Malta's comments on the Third River Basin
Management Plan for Malta
18th March 2024

BirdLife Malta welcomes the drafting of the 3rd River Basin Management Plan (RBMP) pursuant to the Water Framework Directive (WFD) whose end goal is to implement an integrated approach towards the protection of water, including inland surface waters, transitional waters, coastal waters and groundwater. We understand that ongoing infringement proceedings on the subject are not ideal, and would like to submit our feedback as follows.

General comments

As mentioned in the draft, Malta is characterised by a semi-arid climate, which implies relatively low levels of rainfall with high evapotranspiration rates. Being a small island state with highly limited freshwater sources, Malta is extremely sensitive to water scarcity, with climate change only adding more risks and uncertainties to the situation. An ambitious, data-based, strategic vision for its water resources management is what Malta requires to address water security and ensure the well-being of its citizens and the environment.

In developing the next RBMP, it is important to take thorough consideration of the problems and progress in the implementation of the 2nd RBMP to ensure the continuity of the process and adjust the Programme of Measures (PoM) to achieve the best possible results. It is regretful to see that from one RBMP to another, some issues and limitations persist, like, for instance, the absence of defined standards or ranges for hydromorphological conditions and physicochemical elements that correspond to the ecological status boundaries of the Biological Quality Elements. Without such standards it is simply impossible to sufficiently monitor the state of water bodies, not to mention to track the progress.

Groundwater

Malta's groundwater is of poor status due to contamination, and it should be a major priority for the government to address this alarming issue. Nitrates in our groundwater exceed the permissible limit of 50mg/l, which is mostly associated with unsustainable



agricultural practices^{1,2}. Stronger measures should be proposed to avoid further contamination of groundwater resources. A rapid shift towards pesticides-free agriculture should be ensured, with farmers receiving the support from the state, including financial benefits, subsidies, etc.

Unsustainable abstraction of groundwater is yet another significant threat, especially in our Mediterranean region, where the weather conditions are getting drier and the precipitation patterns are changing. Amongst the European countries, Malta has the second highest Water Exploitation Index with an increasing trend, according to Eurostat data³. As per the draft Green Paper on the Regulation of Groundwater Abstraction, in Malta, the number of registered low-yield groundwater abstraction sources, including 'spieri', amounts to 3,405. Such sources are not metered, meaning that the volume of abstracted groundwater from these cannot be quantified. The agricultural sector should be encouraged to apply a range of tools to increase water use efficiency. To ensure as little water is wasted as possible, the government could take a proactive position and launch an initiative on the implementation of sustainable irrigation systems (such as drip irrigation) for the agricultural sector, including through proposing subsidies to small-scale farmers. Diversification of water supply is a vital step to reach sustainability in agriculture.

The problem of groundwater depletion goes hand in hand with marine water intrusion into the groundwater bodies. While noting government's intention to conduct further studies to determine the nature of sea-water intrusion into the aquifers, we would like to call for urgent action to prevent further damage of the Pwales valley aquifer. Groundwater in this valley is not reaching good status objectives due to parameters related to sea-water intrusion. The area is sensitive for many reasons:

- + the groundwater body is relatively small in size, yet the abstraction is high due to dense irrigation;
- + the area is more susceptible to pressures, such as sea water intrusion;
- + presence of Ramsar site - Simar nature reserve representing a wetland dependent on the healthy and well-functioning valley system and availability of groundwater.

The 3rd RBMP is not winning much by simply exempting the Pwales groundwater body from the need to reach the good status objectives by 2027. Although, we understand the reasoning behind such exemption (which also applies to Marfa groundwater body), the PoM should strongly support the improvement of Pwales aquifer status, including by introducing an efficient control and monitoring of groundwater abstraction in the valley to allow for natural recharge. Article 4 of the WFD stipulates that the member states

¹ [Malta water table 'fails' test due to high nitrates \(maltatoday.com.mt\)](http://maltatoday.com.mt)

² [SDG 2 - Zero hunger - Statistics Explained \(europa.eu\)](https://european-council.europa.eu/media/en/press-communications/infographic/infographic_sdg2_en.pdf)

³ [Statistics | Eurostat \(europa.eu\)](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&code=sdg_6_6_1&plugin=1)



shall protect, enhance and restore all bodies of groundwater, ensure a balance between abstraction and recharge of groundwater. We urge the government to take urgent and adequate measures to prevent damage to Pwales groundwater body in line with its EU obligations.

The use of groundwater by sectors which can rely on alternative sources of water supply should be avoided. This can relate, for instance, to industry, construction, to a certain extent agriculture.

A significant threat to the state of groundwater in Malta is illegal or inappropriate use. An example of the latter is the abstraction of groundwater to meet the needs of artificial ponds. Such ponds are common in Maltese ODZ and are normally created for hunting purposes, such as to attract waterbirds. A great number of such ponds are created without a required permitting procedure, and frequently located within the protected areas. This is a waste of valuable natural resource and is unacceptable. Moreover our efforts at reporting such illegal developments, are normally met with a paucity in enforcement and follow-up. It is often the case that such ponds are tolerated, and then a develop and sanction attitude is being permitted, with the applicant developing illegally such ponds, and then being granted a sanction permit months after. An aerial look at platforms such as Google Maps or Google Earth reveals how these sites are mushrooming in ODZ areas.

We would like to stress once again on the importance of policy synergies. Thus, the Green Paper on the Regulation of Groundwater Abstraction that is being drafted at the moment, should be in line with the finalised 3rd RBMP and developed in parallel allowing to include the environmental considerations in a comprehensive manner with the aim to achieve good qualitative and quantitative status of groundwater.

Coastal waters

Maltese coastal waters are facing various pressures, some of which have not been devoted with attention under the draft RBMP. Under the latter, we would like to mention maritime traffic and associated impacts, including but not limited to fuel spills. Traffic within the Maltese 1nm is very intense and increases during the tourist season, therefore this pressure on the quality of coastal waters should be included into the new RBMP and addressed accordingly.

The coastal area of Maghtab is seeing a lot of new development proposals, some of which are associated with additional discharges into the coastal waters (MTC104). Such



impacts should be understood better, to adequately protect the water resources from pollution and maintain their good status.

Marine litter is an increasing threat to marine species and ecosystems, as well as to human health, with negative implications on economic sectors such as aquaculture, tourism, fisheries etc. A local NGO Zibel have collected more 137 tons of marine litter in the Maltese coastal waters over the past years⁴. We call on the authorities to better integrate this pressure into the RBMP and work out appropriate measures to gradually decrease the amount of marine litter in the coastal waters and to prevent further littering, including through integrating and implementing the Single-Use Plastics Directive objectives. The problem of abandoned, lost or otherwise discarded fishing gear must be covered under the RBMN as well, since this issue is of great concern in Malta with Zibel having collected at least 103 ALDG in the Maltese coastal waters in the last 7 years⁴.

Impacts on water quality from aquaculture are not addressed enough, while the negative implications are well known. The aquaculture industry is one that is projected to grow exponentially, with too often a situation of polluted waters around these areas resulting directly due to the intensity of aquaculture practices and the feeding it requires. Without a projected cap on this activity, the repercussions in water quality in the near future might be very much unpredictable.

Rainwater

Investment into the expansion of an efficient rainwater catchment and storage infrastructure should be intensified to provide wider diversification options for water users. Rainwater runoff storage and recharge system is traditionally used in Malta, however, the potential of this water source is not utilised to the fullest. We urge for more ambitious and tangible targets, as well as effective measures to harness rainwater. More efficient harvesting of rainwater in towns will decrease the problem of urban water runoff which is especially the issue in Malta during the rainy season. There should be incentives into the retrofitting of households with water-catchment facilities, such as these make best possible use of harvested water, decreasing demand from other sources, or simply allowing a recharge of the aquifer.

At the same time, to make a better use of not harvested rainwater, additional measures on developing a green infrastructure in localities can be ensured. The design of such infrastructure would allow the adoption of nature's way by capturing rainwater where it falls. This is a cost-effective solution which provides a number of advantages, including

⁴ [NGO | Zibel](#)



the reduced local flooding, greener urban areas, increased aesthetics, saving of costs for watering urban parks and flowerbeds., etc.

Valley protection

Several years ago Malta launched its Valley Management Plan which is a great initiative aimed at developing a deeper scientific knowledge of the ecology of the valley systems in the Maltese Islands and working out feasible plans to manage, protect and restore our valleys. As much inspiring as this project is, what we did see is further development applications being approved in the valleys across Malta, which is counterproductive to any management and conservation actions. The new RBMP should include proper measures which would ensure that no intrusive developments are favoured within the valleys, for this it is important to work together with the Planning Authority to make the best use of existing planning regulations and initiate relevant amendments which would support the objectives of the 3rd RBMP. Freshwater crab and Painted frog protection should be accounted for in the development and implementation of the Valley Management master plans; better monitoring of ecological features of such areas is required. Ecological restoration of inland and coastal waterways should be seen as an opportunity to replenish aquifers where these exist, and are to be commended were possible as a means of mitigating flooding and recharge amongst the various advantages restored ecosystems bring about.

Non-conventional water resources

According to the draft, 35% of water supply in Malta is coming from groundwater. Given the state of groundwater resources which both quantitatively and qualitatively are not reaching a good status, diversification of water resources should be encouraged and intensified. The new water initiative, which was launched by the government in 2018, is a great alternative, however the infrastructure remains insufficient and where it does exist the supply is not always provided. Only 2% of water was reused in 2022, while more ambitious targets are needed to ensure water security for Malta. A tangible and measurable target for new water should be set under the 3rd RBMP and required measures developed under the PoM. Better collaboration with business, farmers, producers, as well as between the relevant governmental entities is needed to ensure stakeholder engagement in the process. The new water should become a reliable source for agricultural irrigation, which is especially relevant and urgent for Pwales valley.

Intensification of rainwater harvesting is an essential and traditional way of addressing water scarcity. As already mentioned above, more incentives should be provided to farmers, households and businesses to encourage rainwater harnessing.



Technical comments

According to the WFD, “the summary of the register required as part of the river basin management plan shall include maps indicating the location of each protected area and a description of the Community, national or local legislation under which they have been designated”.