



BirdLife Malta's recommendations on the Intent and Objectives: Updated National Air Pollution Control Programme

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Whilst welcoming the updating of Malta's National Air Pollution Control Programme, BirdLife Malta would like to submit our recommendations with respect to the Intent and Objectives of the mentioned Programme as part of the public consultation process.

Whilst acknowledging the significance of the first objective, which aims to reduce air pollutant emissions to achieve compliance with national emission reduction commitments, we also emphasize the importance of establishing and maintaining a comprehensive air quality monitoring network. This has been a long-standing approach used for air quality management, to assess pollution levels, identify hotspots, and track progress. In addition, it is important to monitor spatial and temporal patterns in the concentration of pollutants, where some sites might experience higher level of pollutants at different times, including daily and seasonal¹. Monitoring should include both ambient air quality monitoring and monitoring emissions from both land-based and offshore-based point sources. Identifying high risk areas and point sources is essential for developing site-specific control of air pollution. It is also important that the air monitoring stations are aligned with the requirements under the Ambient Air Quality Directive, including the microscale siting criteria. We recommend that the existing monitoring stations are revised to make sure that their locations and design are in compliance with the Directive's criteria. Consequently, we suggest that in addition to the first objective, an additional objective of the Programme should be to develop and maintain a comprehensive air quality monitoring network.

The second objective focuses on enhancing air quality and ensuring compliance with the limit values outlined in the Ambient Air Quality Directive. While acknowledging the program's commitment to meeting these directives, it is imperative to emphasize that enhancing air quality is crucial for safeguarding public health, preserving the environment, and fostering sustainable development. In addition, we believe that the last objective vis-à-vis identifying and maximising "synergies to ensure coherence with other plans and programmes, including those related to climate, energy, agriculture, industry and transport", is not ambitious enough. Without specific examples or strategies, it is challenging to assess the feasibility and effectiveness of this objective.

¹ World Health Organization. (2021). *WHO global air quality guidelines: particulate matter (PM_{2.5} and PM₁₀), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide*. World Health Organization.



The objectives of the Programme would benefit from greater specificity, particularly in transitioning to clean technology and transportation, with clearly defined percentage transition targets and prioritizing investments in cleaner technology. The Programme should strive to promote innovative solutions for emission reductions that surpass Directive requirements. Additionally, it should integrate synergies with road and urban infrastructure plans to maximize effectiveness. The prioritization of cars in the urban road and parking infrastructure in Malta has long been recognized as inherently unjust. This design approach creates significant obstacles for accessing essential services in towns and villages, rendering walking and cycling perceived as unsafe options². Regarding synergies with industries, another objective of the Programme should involve limitations on the number and scale of industrial activities contributing to air pollutant emissions. This includes coordinating construction projects to mitigate cumulative emissions that significantly affect Malta's air quality.

Overall, while the objectives outlined in the 'Intent and Objectives' are noteworthy, providing greater specificity and clarity could strengthen the proposed approach to air pollution control. Another objective we advocate for inclusion is to foster collaboration and partnerships among government agencies, industry stakeholders, non-governmental organizations, academic institutions, and international partners. Such an objective would foster coordination of efforts and sharing best practices. Lastly, prioritizing compliance and enforcement within the Programme is crucial. Strategies to strengthen enforcement mechanisms, monitoring systems, and penalties for non-compliance with air pollutant emission limits should be promoted to ensure accountability and prevent infringements by polluting entities.

² Attard, M. (2020). Mobility justice in urban transport-the case of Malta. *Transportation research procedia*, 45, 352-359.