



BirdLife Malta feedback on the Establishment of the Majjistral, Nature and History Park (Amendment) Regulations, 2024

12th November 2024

As part of the public consultation process on the amendments of the Establishment of the Majjistral, Nature and History Park, BirdLife Malta would like to provide the below feedback:

i. Amendment to Subregulation (1) of Regulation 8:

The proposed amendment transfers the responsibility for issuing the management plan from the Board to the competent authority. While we acknowledge that the Act allows for “the active involvement of local communities and populations” in the management plan, we recommend that the active involvement of the Board itself is explicitly included in the Majjistral Nature and History Park Regulations. The managing organisations, being also represented in the Board, shall bring essential experience and knowledge into identifying gaps that need to be addressed within the management plan, contributing significantly to the development of a robust plan.

In addition, the amendments hints that the issuance of a management plan shall be at the discretion of the competent authority. It is an optional action as opposed to the mandated requirement specified in the current regulation. We believe this requirement should remain compulsory, particularly given the park’s significant protected areas under the Habitats Directive.

ii. Deletion of Annex II of the principal regulations

First and foremost, we would like to point out that the current regulations, as well as the proposed amendments, are ambiguous on the definition of ‘managing organisations’, sometimes also being referred to as non-governmental organisations (NGOs). With the proposed amendments, it is also not clear how many managing organisations will enter into agreements for the management of the park. Hence, we suggest that a clear definition of ‘managing organisations’ is included together with the maximum number of organisations that may be appointed.

Furthermore, the proposed deletion of Annex II creates uncertainty regarding which ‘managing organisations’ (or NGOs) will hold management agreements for the park. Although the principal regulations state that the Minister or their representative may



enter agreements with NGOs working in heritage or environmental management, we are concerned that such agreements may be awarded to organisations lacking the requisite expertise for implementing the management plan or conservation measures. Thus, we recommend establishing stricter eligibility criteria for NGOs serving as managing organisations. For example, only NGOs with a minimum of three years' proven experience in environmental conservation and management should qualify for consideration. Additionally, the process for selecting managing organisations should involve public consultation to ensure transparency and community support.