



BirdLife Malta feedback to Dwejra Protection and Management Regulations, 2026

03/03/2026

BirdLife Malta welcomes this public consultation on the Dwejra Protection and Management Regulations. These site-specific regulations represent a significant step forward in strengthening the protection of an area of ecological and geological importance. They acknowledge the unique natural value of Dwejra and contribute to a broader process aimed at ensuring that ecologically important sites are afforded enhanced protection through clear, regulated guidelines that safeguard them from activities and pressures that threaten their ecological integrity.

Nonetheless, while we recognise the positive intent behind these regulations, we believe that certain provisions require further scrutiny. Some articles raise concerns and should be revised to ensure that the regulations fully achieve their conservation objectives. We therefore present below our recommendations on the regulations as published for consultation:

Article/Section	Recommendation	Rationale
1	<p>It is recommended that <i>restoration</i> be explicitly included among the aims of these regulations.</p> <p>Suggested wording could be: “Ensure that all habitats are restored to good condition, including, where appropriate, through the application of ecological restoration processes.”</p> <p>OR</p>	<p>The boundary of the designated Special Area of Geological Importance coincides with Annex 1 habitats of the Habitats Directive. These habitat types also fall within the scope of Regulation (EU) 2024/1991 on nature restoration. Under this regulation, habitats that are not in good condition are required to be restored.</p> <p>To ensure coherence and streamlining between legal instruments, the concept of <i>restoration</i> should therefore be incorporated into these regulations, alongside conservation, so that they align with the objectives and terminology of the Nature Restoration Law.</p>

Article/Section	Recommendation	Rationale
	<p>Could be incorporated into aim (b) by rewording it as follows: “Safeguard the site’s biodiversity through the conservation and restoration of its natural habitats and wild flora and fauna.”</p>	
5	<p>One member representing environmental non-governmental organisations (eNGOs) should be explicitly included in the composition of the Steering Committee.</p>	<p>Given that the primary aims of these regulations are the protection and conservation of the biodiversity of the Dwejra–Qawra area, it is essential that the Steering Committee reflects these objectives in its composition. Including a representative from an eNGO would help ensure balanced and fair representation, particularly from stakeholders with recognised expertise and experience in environmental protection and conservation management.</p>
6(1)	<p>Add restoration as one of the remits of the committee .</p>	<p>Ensures that habitat restoration responsibilities are formally recognised alongside conservation.</p>
6(3)	<p>Reports and minutes of meeting should be publicly available or available upon specific requests.</p>	<p>To ensure transparency for all stakeholders and encourage accountability.</p>
7(1)(a)	<p>Include the verb ‘to lure’.</p>	
7(1)(c)	<p>Remove the word ‘deliberate’.</p>	<p>The inclusion of the word ‘deliberate’ creates a loophole by requiring proof of intent before action can be taken. This allows individuals who damage breeding sites or resting places of birds to avoid accountability by claiming they were unaware their actions would cause harm. Removing the term would strengthen protection by focusing on the impact of the activity rather than the claimed intent behind it.</p>

Article/Section	Recommendation	Rationale
7(1)(i)	<p>Add reference to specific noise thresholds in terms of dB.</p> <p>Include lighting restrictions.</p> <p>Use of lighting within Zone 2 should strictly be limited to the use of handheld or head-mounted torches with red lighting. Such restriction should be clearly indicated in the issued permits.</p>	<p>In Zone 2, BBQs and camping will be permitted. While the regulations include an article addressing noise, they do not provide any restrictions on lighting. Inadequate or poorly managed lighting - even when temporary and not installed as permanent fixtures - can be equally harmful and should therefore be properly regulated.</p>
7(1)j	<p>Amend the reference from “Notice to Mariners No. 44 of 2020” to ““Notice to Mariners No. 44 of 2020 and any subsequent revisions or replacements”.</p>	<p>While Notice to Mariners No. 44 of 2020 is a good reference, it should acknowledge that the notice to mariners is updated regularly by Transport Malta.</p>
7(1)(k)	<p>It should be clearly specified which areas are officially designated for parking and these should be clearly indicated in the annexed maps, so that any parking outside these areas is considered as taking place within the</p>	<p>Prevents habitat disturbance and ensures compliance with protected area regulations.</p>

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	protected area. It should also specify that vehicles must not remain running while idle and must not have lights on when stationary.	
7(1)(l)	Include also electric motorbikes (which are becoming a new trend in off-roading) and bicycles.	While not causing any noise they still add pressure through trampling on sensitive habitats.
7(2)(b)	There should be no light on land permitted: “no lights on land are permitted from sunset to sunrise”.	Any artificial lighting after sunset poses a significant threat to the seabirds present in Dwejra-Qawra area because of their nocturnal behavioral patterns. Seabirds rely on darkness as a predator-avoidance strategy, returning to their nests under the cover of night. Colony attendance is highest within the first two hours after sunset, as illustrated by data from a colony of Yelkouan Shearwater in northwestern Malta, which shows peak cave entry during this period (Figure 1). This time is critical, as shearwaters return to incubate their eggs and feed their chicks. Any reduction in colony attendance can have consequences for breeding success.

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		<p data-bbox="791 902 1453 987"><i>Figure 1: Frequency of individual Yelkouan Shearwaters entering the cave (blue) and leaving (green) scaled to time after sunset, in relation to the four moon phases¹</i></p>
7(2)(f)	We recommend that instead of imposing phased shielding there should be phased retrofitting.	Offers a more effective and long-lasting approach to mitigating light pollution, as properly retrofitted light fixtures provide a permanent solution, unlike temporary shielding which may be removed.

Further recommendations:

- Biosecurity:** A dedicated article on biosecurity, covering both land and sea, should be included. Rodent predation poses a significant threat to seabird colonies, as rodents feed on eggs and chicks in nests located on cliffs, in crevices, or among boulder screes, severely reducing breeding success. Poor practices -like uncollected waste or waste bins without lids - attract rodents, which indirectly supports their population growth. It is therefore essential that an effective waste management system is set-up and included in the regulations. At sea, biosecurity measures should include the capping of anchoring below Fungus Rock and subject to permit.
- Regulation of Kiosks:** The number of kiosks allowed to operate should be capped at the current level (kiosks with permits and allowed to operate until sunset). This will prevent any future increase that could place unsustainable

¹ Austad, M., Oppel, S., Crymble, J., Greetham, H. R., Sahin, D., Lago, P., ...& Quillfeldt, P. (2023). The effects of temporally distinct light pollution from ships on nocturnal colony attendance in a threatened seabird. *Journal of Ornithology*, 164(3), 527-536.



pressure on the area, including higher visitor numbers and additional waste, thereby helping to protect the site's ecological and environmental integrity.

Conclusion

While BirdLife Malta endorses the initiative behind the Dwejra Protection and Management Regulations, we wish to emphasise that the most critical measure for protecting the avifauna supported by the area is strict control of artificial lighting. Seabird colonies rely on darkness for predator avoidance and successful breeding, and any lighting after sunset disrupts natural behaviors, directly threatening breeding success. We therefore strongly recommend a clear prohibition of all lights on land and at sea from sunset to sunrise. This measure is essential to safeguard the ecological integrity of Dwejra and ensure the long-term protection of its internationally important seabird colonies. Other measures, including effective waste management and regulation of noise-producing activities, are also crucial for the protection of these seabird colonies. We hope that these recommendations will be fully integrated into the final regulations, setting an example for site-specific measures that prioritise the conservation and protection of the natural environment.