BirdLife Malta feedback to the Conservation Objectives and Measures for Malta's Terrestrial Natura 2000 Sites – Set 2 (Gozo)

25/11/2025

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1. General Comments

BirdLife Malta presents the following comments and recommendations in response to the public consultation on the Conservation Objectives and Measures for Gozo's terrestrial Natura 2000 sites.

We understand that this public consultation forms part of the review process for measures initially published in 2016. It is also noted that, under Regulation 14(6) of the Flora, Fauna, and Natural Habitats Protection Regulations (S.L. 549.44), ERA, as the competent authority, is required to review the management plans for SACs and SPAs at least every five years. However, this review is occurring nine years after the previous publication. Therefore, we wish to emphasise the urgency of finalising and publishing these plans, as the established five-year review period has been exceeded by four years.

Additionally, we highlight that the recently enacted Regulation (EU) 2024/1991 on nature restoration necessitates that member states carry out preparatory monitoring and research to identify and implement the necessary restoration measures. Consequently, the conservation measures of Natura 2000 sites should now aim to ensure harmony with the objectives and targets outlined in this regulation.

2. Involvement of stakeholders and incentives

The measures and objectives should actively seek to include key stakeholders in the implementation of measures for Natura 2000 sites. While it is noted that the majority of actions fall under the responsibility of ERA and EcoGozo, engaging other stakeholders could yield significant benefits. Involving the community fosters a sense of ownership and responsibility for environmental protection. For instance, farmers, fishers and landowners could be identified as potential collaborators in implementing measures such as the removal of invasive alien species or the planting of native species. Their inclusion would enhance the effectiveness and sustainability of these conservation efforts. Thus the identification and engagement of stakeholders should feature as a measure or objective itself of each management plan. Incentives to encourage such collaboration should be established - a measure that can also partially address implementation challenges in privately owned Natura 2000 areas.

3. Gaps in reporting and limitations of current performance indicators

To date, no reports on the implementation of previous management plans have been published publicly, making it difficult for interested parties to evaluate the achievements of past conservation efforts or gain a clear understanding of the necessary future measures.

Additionally, the presented management plan appears to rely heavily on habitat area, species composition, and population numbers as performance indicators. While these figures are important as baseline data, they do not provide sufficient insight into the health and representativeness of species populations within an ecosystem. Ecological and demographic indices could offer a more comprehensive understanding of habitat and species health. For instance, comparisons of population densities with historical data, age structure, genetic diversity, and reproductive success can provide deeper insights. Such data might be collected under other obligations, such as the Habitats & Bird's Directives and MSFD, and there might need to be clearer links with informing site management.

4. Updating Standard Data Forms

We strongly encourage an update of the Natura 2000 SPA Standard Data Forms (SDF) is carried out in parallel to the finalisation of the conservation measures. We encourage that, while SDFs should reflect the most current population estimates for each site, management plans should instead report the highest recorded population estimates and use these as the conservation targets for the site. This in the absence of favourable reference values, which to the best of our knowledge have not yet been established to guide conservation measures. For species experiencing declines, population sizes in conservation measures should not be updated with the lower estimates. A clear example is the population estimate for *Calonectris diomedea* at MT0000028. Table 9 of the Conservation Objectives & Measures reports a figure of 180–230 breeding pairs (b.p.). However, as referenced in Table 7 of the Seabird Fieldwork Report[1], an earlier estimate from 2011 placed the population at approximately 300 b.p. The conservation measures should be based on this higher estimate, and a target of 300 b.p. should be established. At the same time, the process should allow for improved population estimates. Thus, the approach taken and estimates for *Calonectris diomedea* at MT0000027 (Table 13 of the Conservation Objectives & Measures) is correct. BirdLife Malta offers its support in these updates as necessary.

Therefore, we encourage to distinguish between current population size (to be updated in SDFs) and conservation measure target population size. In this context it would be good to supply the year and source of population sizes given in the document.

In addition, SDFs for Natura 2000 SPAs should be updated with migratory species that might pass or use the site as a stop over in substantial numbers. Conservation measures should be included to safeguard stop-over behaviour and need.

Finally, we acknowledge the addition of *Hydrobates pelagicus* in pg. 35 for MT0000019, MT0000029, and MT0000030 - but we want to make sure that it is clear that the colony has been recorded in MT0000030 only. In addition to their inclusion in the conservation measures, the species should be added to the SDF form for MT0000030.

[1] SEABIRD FIELDWORK REPORT 2021. https://era.org.mt/wp-content/uploads/2022/11/Seabird-Fieldwork-Report-2021-public.pdf.

5. Specification of human impacts and their management

While the conservation measures aim to mitigate human disturbances such as trampling, commercial activities, and outdoor sports, leisure, and recreational pursuits, the management plan should be more specific about the particular impacts that need to be addressed in each site to establish clear and achievable goals.

Certain activities pose a greater threat to specific sites; for instance,
the management plans should explicitly address the need to restrict or reduce the frequency of activities including:

- **Fireworks and outdoor events:** Fireworks and outdoor events held near sensitive habitats throughout the year can significantly impact the ecological integrity of Natura 2000 sites. The management plan for these sites and their buffer zones should therefore include a clear list of permitted and non-permitted activities.

- **Sport climbing routes:** We enourage the regularisation of sports climbing routes with Natura 2000 sites, in participation with the climbing community. Uncontrolled and frequent climbing affect sensitive species such as birds of prey, seabirds and *Monticola solitarius*. Opening up of new routes can also affect cliff vegetation.

- **Chemical alterations to water bodies:** The conservation measures overlook the threat of chemical alterations to water bodies caused by fertilisers and pesticides used in agriculture. Agricultural practices in or around present significant risks to these water bodies. It is essential to collect baseline data on the chemical composition of Natura 2000 water bodies to identify pollution levels caused by agricultural runoff. Based on these findings, measures should be implemented, such as educating farmers on the use of eco-friendly pesticides and conducting regular ex-situ checks to identify and mitigate sources of pollution. These actions would help ensure that agricultural activities within and around Natura 2000 sites are conducted in a manner that does not harm the surrounding ecology.

- **Off-leash dogs:** In all cases preventing dogs off leash should be added to Pressures and threats: Human Disturbance (Trampling) or as a separate measure. At Ta' Ċenċ in particular the number of dog walkers allowing dogs to roam off leash is substantially high. They are expected to have a disturbance impact on ground nesting birds such as *Calandrella brachydactyla.* In addition, in MT0000005, while the sand dune and wetland area has rope guards warning against human trampling these are not effective at stopping dogs off leash roaming the areas (enforcement and education is required here).

- **Burning in coastal areas:** On Gozo, the practice of extensive burning in coastal areas is a prevalent threat and should be addressed.

- **Boat disturbance:** Boat disturbance affecting sea cliffs and caves should also be included and addressed accordingly in MT19_CM_12b, MT20_CM_15b, and MT34_CM_13a.

6. Light Pollution in all Natura 2000 Sites

Whilst it is noted that a specific measure for 'New developments proposed within and in the vicinity of the site are assessed with respect to potential light pollution' is used throughout the document, a measure for tackling existing light pollution sources should be in place.

It is essential that, for each Natura 2000 site, all sources of light pollution (including those already in use), both within and outside the sites, are identified and mitigated. Particular attention should be given to external light sources within or beyond Natura 2000 sites, that permanently or temporary illuminate any part of a Natura 2000 site or cause elevated levels of illuminance within its boundaries. Lighting conditions should be clearly defined and measurable to ensure proper enforcement.
Measures should be complemented by maintaining Dark Sky Heritage area standards as part of the Gozo Local Plan and of particular concern is Dwejra, where increase in artificial light is threatening seabirds at MT0000029 (SPA) and MT0000030 (SPA). Measures need to be in place from sunset to sunrise so not to affect behaviours adapted to lunar cycles[2]. As for the risk of grounding by fledgling shearwaters and petrels, the risk is actually highest after sunset when these birds tend to leave the nest[3].

7. Waste Collection in all Natura 2000 Sites

Waste collection at all Natura 2000 sites should be conducted on evenings and all year round, complemented by the regular maintenance of bins to ensure they remain rat-proof where applicable. The use of surveillance equipment and/or patrols by enforcement officials should be implemented to deter illegal dumping. Waste management efforts should extend beyond the sites themselves to include surrounding areas, such as measures to minimise waste generated near the sites from boathouses, farms, and similar sources. Establishing a buffer zone with additional management measures could help address these external waste challenges effectively.

[2] 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.
[3] Rodríguez, A., Rodríguez, B., & Negro, J. J. (2015). GPS tracking for mapping seabird mortality induced by light pollution. *Scientific reports*, *5*(1), 10670.

Therefore, at all Natura 2000 sites the establishment of a waste management system should be included as a measure – which should detail how waste collection will be implement at specific sites, how the managing body shall implement it, etc.

8. **Management of Invasive Alien Species**

The measures and objectives appropriately include the removal of existing alien species; however, they appear to lack concrete provisions to prevent the introduction of new invasive species. It is also concerning that current measures apply only to invasive species of Union concern, leaving potentially harmful species not of Union concern unaddressed, despite their capacity to threaten native species and ecosystem integrity.

We welcome the explicit recognition of feral cats as a threat to seabird colonies. Efforts to control invasive species should also prevent the establishment of new cat colonies. While practices such as trapping, neutering, and relocation are beneficial, legislative amendments are needed to prohibit the creation of cat colonies in or close to specific Natura 2000 sites to safeguard their ecological integrity. More broadly, cat feeding and general presence should be restricted across all Natura 2000 sites to strengthen measures aimed at reducing feral cat activity.

9. **Conservation measures for migratory and breeding birds**

- **Maintaining biodiverse habitats for migratory and breeding species:** Several bird species, both migratory and breeding, are not mentioned in the conservation measures. Migratory bird species are for example part of the Ta' Ċenċ SPA but do not feature at all in the conservation measures. Maintaining biodiverse habitats as part of SAC measures is one the important measures to provide suitable stopover habitat.

  While certain Annex I species might not currently breed or use sites at high enough numbers to trigger SPAs themselves, we encourage their inclusion in conservation measures so that their populations are allowed to re-establish with the Natura 2000 network. As an example, it should be a conservation target for *Falco peregrinus* (Annex I) and *Falco tinnunculus* to be able to breed safely in most of the SPAs on Gozo. In the Standard Data Form of the SPA of 'Rdumijiet ta' Għawdex: Ta' Ċenċ', both species are listed, and the Peregrine Falcon is mentioned in the 'Quality and importance' section where it is specified that the species is known to have bred at Ta' Ċenċ.

- **Measures to increase knowledge on breeding populations:** We are pleased to note the measure to increase knowledge on the breeding population of *Calandrella brachydactyla*, and encourage to expand it to study what habitat and agricultural practices are favoured by the species. The study should also have in scope to identify areas of potetial SPA expansion for the species. It can also include other species that breed in similar habitat, for example *Emberiza calandra*, a once common breeding bird which is now practically extinct from Gozo. The measure of increased knowledge can be expanded to other species as well, both migrant and breeding. For one this should

include a study of the potential carrying capacity and target breeding population of *Falco peregrinus*.

- **Tree and shrub planting:** While tree and shrub planting, both as part of agricultural systems and as part of nature restoration, can be beneficial to several environmental aspects, we encourage caution and careful planning when it comes to coastal areas and areas that are breeding locations for *Calandrella brachydactyla* and *Sylvia conspicillata*. These species requires more open habitat, often farmed at low intensity levels, but might dissapear from areas fragmented by groves or plantations of trees.

- **Expansion of MT0000026:** We strongly encourage the expansion of MT0000026 and designation as an SPA to include a *Puffinus yelkouan* colony (50-80 pairs) at Ta' Isopu. This is the only colony outside any N2K designation in the Maltese Islands[4].

- **Measures to reduce feral pigeons:** An emerging threat to seabirds that is not mentioned is the increase in Feral Pigeons (*Columbia livia domestica*) within the same nesting burrows as seabirds, with indications of nest competition. The above mentioned measure to allow *Falco peregrinus* to breed safely would counteract the increase in pigeons.

- **Impacts of existing developments and activities:** Whilst we acknowledge that the measure *"Works and activities proposed within and in the vicinity of the site are assessed, and any preventive or mitigation measures to reduce disturbance to birds are adopted accordingly"* is included (MT19_CM_12d; MT20_CM_15d; MT34_CM_13e), this provision should also explicitly cover existing developments and activities.

10. **Restoration measures and expansion of Annex 1 habitats**

Whilst it is acknowledged that the conservation measures aim to maintain the extent of Annex I habitats, targets for expanding these habitats should also be included and aligned with the newly enacted Nature Restoration Law. For example, site MT0000005, L-Inħawi tar-Ramla, has clear potential for habitat expansion in line with the Nature Restoration Law, particularly through the re-establishment of Annex I wetland habitats such as Southern riparian galleries and thickets (92D0).

Measures to restore decommissioned or disused sites - such as quarries - should be incorporated. This should also include abandoned or disused trapping sites – such sites completely strip bare garrigue areas. Even for registered trapping sites, the common practice of using herbicides to clear areas of vegetation should not be allowed (Figure 1).

[4] Table 4 in SEABIRD FIELDWORK REPORT 2021. https://era.org.mt/wp-content/uploads/2022/11/Seabird-Fieldwork-Report-2021-public.pdf.

Figure 1: Vegetation clearance at a trapping site in MT0000030

The quarry along the cliffs in Dwejra (application PA/08763/19), part of which lies within the Natura 2000 site MT0000030, is scheduled for restoration according to a predefined method. The decision notice requires that the area be "restored within a timeframe of one year from the submission of the commencement notice," which may be insufficient for careful ecological restoration. Additionally, BLM has previously expressed concerns regarding why not all affected land within the Natura 2000 site (Areas 1 and 2, as shown on the relevant maps) is included in the restoration plan, with only a portion planned for restoration under this application. Conservation measures should address such gaps, ensuring that all disused quarry areas within Natura 2000 boundaries are fully restored in accordance with good practices and appropriate timelines.

11. Recognition of trapping sites and excavated water ponds for hunting purposes as threats

For all SAC sites, we recommend explicitly identifying trapping areas - particularly those located within Annex I habitats - as a threat, given the associated vegetation clearance and use of herbicides.

Similarly, excavated water ponds created for hunting purposes within SACs and SPAs should be recognised as a significant threat due to their impact on habitats, migrant birds, and the extraction of groundwater required to maintain them (Figure 2). BirdLife Malta has, as far as practicable, been documenting these ponds both within and outside Natura 2000 sites. To our knowledge, no permits have been issued for these excavations, and enforcement regarding such structures is lacking.

Table 1 below outlines the number of excavated water ponds recorded by BLM within each Natura 2000 site, together with a photo of the hunting pond recorded at Għajn Barrani MT0000001(Figure 2). We remain available to provide further site-specific details on the location of these ponds.

Table 1: Number of recorded excavated hunting ponds in Natura 2000 sites

Natura 2000 Site	Number of recorded ponds
L-Inħawi tad-Dwejra u tal-Qawra, inkluż Ħaġret il-Ġeneral	2
L-Inħawi ta' Għajn Barrani	1
L-Inħawi tax-Xlendi u tal-Wied tal-Kantra	4
Rdumijiet ta' Għawdex: Il-Ponta ta' Ħarrux sal-Bajja tax-Xlendi	2

Figure 2: Excavated hunting pond at Għajn Barrani MT0000001

12. **Feasibility of rodent control in certain cliff sites**

Whilst it is acknowledged that rodent control is included as a conservation measure for SPAs, the feasibility of implementing such measures across large areas and particularly high cliffs requires careful assessment. BirdLife Malta has successfully developed a system of seasonal rodent control at certain seabird colonies, but feasibility is determined by cliff height, number of ledges and coastline length. In particular, for MT19_CM_12a, MT20_CM_15a and MT34_CM_13b, current technologies make large-scale baiting both impractical and difficult to achieve within best practice guidelines while ensuring conservation benefits. Past efforts, experiences, and knowledge exchanges with other BirdLife partners with significant rodent eradication expertise, consistently show that effective rodent control in extensive coastal cliffs and large areas is extremely challenging to implement and monitor. Instead, complementary measures such as improving waste management should be incorporated into all rodent control actions.

The use of “Number of stations in place” as a performance indicator is inappropriate, as it does not reflect effectiveness. A high number of bait stations does not necessarily translate to good implementation, nor would a lower number indicate reduced rodent activity. This indicator

should be removed entirely - instead, using bait consumption or baited motion-sensor cameras to determine rodent activity, would be better suited[5,6].

BirdLife Malta remains available to provide advice on effective rodent-control methods for these areas and beyond.

13. Financing

While we welcome all measures and objectives proposed in these documents, the financing of management plans has been a critical issue for which clearly not enough investment has been afforded in past years. While management plans might detail the financial cost of needed management measures, the financial sustainability of such plans rarely features as an objective and should be regarded seriously if we are to see such measures and objectives transform into effectively implemented management plans.

[5] Davis, R. A., Seddon, P. J., Craig, M. D., & Russell, J. C. (2023). A review of methods for detecting rats at low densities, with implications for surveillance. *Biological invasions*, *25*(12), 3773-3791.
[6] Gronwald, M., & Russell, J. C. (2021). Measuring rat relative abundance using camera traps and digital strike counters for Goodnature A24 self-resetting traps. *New Zealand Journal of Ecology*, *45*(1), 1-7.