



## **Birdlife Malta feedback to 'Malta's Energy Shift: A Sustainable Power Transition'**

28th May 2026

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BirdLife Malta welcomes the vision document 'Malta's Energy Shift: A Sustainable Power Transition' and would like to take this opportunity to provide comments and feedback on the public consultation document. In particular, BirdLife Malta wishes to focus on the shipping sector, given its ongoing participation in a network of NGOs addressing air pollution from ships<sup>1</sup>.

Shipping emissions are a major contributor to global air pollution. The continued use of polluting fossil fuels, particularly heavy fuel oil, results in the release of harmful pollutants such as sulphur oxides (SO<sub>x</sub>), nitrogen oxides (NO<sub>x</sub>), and (ultra-) fine particulate matter (PM). These pollutants pose serious risks to human health, the environment, and the climate, contributing to acid rain, smog, respiratory illnesses, cardiovascular diseases, and other health impacts, particularly in coastal and port communities.

Ship emissions are initially dispersed at chimney height and may travel several hundred metres before settling to ground level. The fallout zones vary depending on wind direction and weather conditions, meaning that the impacts of shipping emissions extend beyond immediate port areas and can affect multiple communities.

### **On Energy Use in Transport**

Electrification efforts should not be limited solely to road transport but should also extend to ferry services operating around the Maltese islands. While efforts are being made to increase ferry connectivity from strategic locations, it is disappointing that stronger measures have not been taken to electrify these services.

If Malta aims to promote a shift away from private vehicle use and encourage greener forms of transport, it would be coherent and appropriate for these ferry services to operate using electric or using low-carbon marine fuels such as green ammonia or methanol. Electrified ferry services would significantly reduce greenhouse gas emissions, noise pollution, and air pollution in coastal and harbour areas, while also demonstrating leadership in sustainable maritime transport.

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<sup>1</sup> <https://en.nabu.de/topics/traffic/eca/index.html>



### **Shore-Side Electricity at the Grand Harbour**

The vision document states that a shore-side electricity project is operational at the Grand Harbour, allowing berthed passenger vessels to connect directly to the electricity grid and thereby reduce reliance on onboard fossil-fuelled engines. The document claims that this initiative has significantly reduced emissions from berthed cruise liners, with ship-generated air pollution reportedly decreasing by around 90% in one of Malta's most densely populated and commercially active areas.

BirdLife Malta questions the basis upon which the reported "90% reduction" in air pollution was calculated and requests transparency regarding the methodology and source of this figure.

While shore-side electricity infrastructure has indeed been implemented, the actual utilisation of this facility remains very limited. At present, only a small number of cruise ships possess the necessary onboard technology to connect to shore-side electricity systems. Consequently, only a limited number of cruise ship calls have made use of this infrastructure.

Through BirdLife Malta's involvement in a project supporting the decarbonisation of the shipping sector, as well as its ongoing engagement with the port residents network, residents have consistently reported that the majority of cruise ships continue to operate their engines while berthed. This appears to be contrary to the claims made in this public consultation document. This continues to have a significant adverse impact on local air quality and the quality of life of nearby residents. The health impacts of shipping-related air pollution on port communities remain severe, and BirdLife Malta would like to take this opportunity to call for stronger and more immediate measures to adequately address this issue.

### **IMO Net-Zero Framework**

BirdLife Malta believes that Malta should support the adoption of the International Maritime Organization's (IMO) Net-Zero Framework (NZF). Supporting this framework would not only contribute to international reductions in greenhouse gas emissions, but would also help reduce local emissions and air pollution, particularly given Malta's strategic importance as a shipping hub in the Mediterranean.

The IMO Net-Zero Framework aims to decarbonise international shipping and achieve the IMO's target of net-zero greenhouse gas emissions by or around 2050. The



framework is intended to become part of MARPOL Annex VI and would apply primarily to oceangoing vessels above 5,000 gross tonnage (GT).

This is particularly relevant to Malta given the significant increase in port activity in recent years. In 2023, Malta received 45,949 port calls, compared to 22,882 in 2012 - effectively doubling within a decade. Compared to 2022, Malta registered a 5.5% increase in port calls, representing the fourth-largest increase in the European Union<sup>2</sup>.

The Malta Freeport is dominated by cargo ships, while Valletta Cruise Port receives large cruise liners. The vast majority of these vessels fall within the above 5,000 GT threshold covered by the IMO Net-Zero Framework.

Given Malta's strategic position and the scale of maritime activity around the islands, BirdLife Malta believes the Government should actively support ambitious international measures aimed at reducing shipping emissions and improving air quality for residents and future generations.

## **Conclusion**

In conclusion, BirdLife Malta considers that while the 'Malta's Energy Shift' vision represents an important step towards a more sustainable future, it does not yet adequately address the significant contribution of the shipping sector to Malta's air pollution and emissions profile. Given the scale of maritime activity around the islands and its direct impact on the health and quality of life of coastal communities, stronger and more immediate action is required, including improved use of shore-side electricity, a clear pathway for the electrification of ferry services, and a broader transition towards low- and zero-carbon marine fuels. A more ambitious and transparent approach to maritime decarbonisation is therefore essential to ensure that Malta's energy transition delivers meaningful environmental and public health benefits for present and future generations.

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<sup>2</sup> <https://timesofmalta.com/article/vessel-entries-malta-double-10-years.1104565>