



BirdLife Malta Feedback to National Agricultural Policy for Malta

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BirdLife Malta welcomes Malta's National Agricultural Policy and recognises the importance of this framework in safeguarding agricultural land, strengthening rural livelihoods, and ensuring long-term food security. BirdLife Malta would like to formally register its interest in the development and implementation of this policy, particularly with regard to measures that protect agricultural land and that strengthen environmental resilience.

Protection and Strategic Management of Agricultural Land

The further loss of agricultural land to development must stop immediately. In recent years, we have seen agricultural land earmarked for large residential apartment blocks, commercial activities, and even schools. According to the most recent Census of Agriculture, 6.2% of agricultural land has been lost over the past 10 years. We cannot continue to sacrifice agricultural land for short-term economic gains.

At the same time, it is equally important to ensure that efforts to protect agricultural land do not result in unintended environmental harm to other valuable land uses and habitats. Nationally and internationally important habitats, such as garrigue landscapes, should not be compromised through the deposition of soil for the purpose of converting them into agricultural land. Past experiences have shown that ecologically valuable habitats have been lost through such practices, only for the land to subsequently be used for purposes unrelated to agriculture.

Agricultural areas should be viewed as important ecological corridors. In this context, it is especially important to safeguard agriculture in designated Natura 2000 sites. Particular caution should also be exercised when reinstating agricultural activities on fields within Natura 2000 sites that have remained uncultivated for extended periods. Over time, such areas often develop significant ecological value and provide important habitat and ecosystem functions for flora and fauna, including nesting sites for farmland birds. Before agricultural activities are resumed, ecological assessments should be undertaken to evaluate potential environmental impacts. Where reinstatement is deemed appropriate, agricultural operations should be phased in gradually and scheduled during periods that minimise disturbance and harm to wildlife and plant communities. This framework should be fully aligned with Malta's National



Restoration Plan, currently being developed pursuant to the Nature Restoration Regulation (EU) 2024/1991. Given that the Plan is expected to include restoration measures for the agricultural sector, such alignment is essential to ensure coherence between agricultural policy objectives and Malta's wider commitments to ecosystem restoration.

Therefore, we recommend that the National Agricultural Policy establish a clear framework for the protection of such agricultural sites and develop an action plan for the environmentally responsible reinstatement of agricultural activities on long-abandoned fields.

Furthermore, BirdLife Malta has observed a growing number of cases where agricultural land is illegally excavated to create artificial water bodies that mimic natural wetlands and attract wading birds for hunting purposes. To date, there is no clearly defined or consistently applied regulatory and enforcement framework to address such cases.

In this respect, we welcome the policy's commitment to strengthening monitoring and enforcement systems. We recommend that monitoring efforts explicitly include the identification and regulation of illegal artificial water ponds on agricultural land, together with the establishment of a clear framework to respond to infringements when they are detected to address this gap in enforcement.

Water, Energy, Climate and Environmental Resilience

While we acknowledge the importance of strengthening advisory and knowledge-transfer services to support farmers in adopting resource-efficient practices, complying with environmental requirements, and improving innovation uptake, we believe that stronger economic incentives are also required to facilitate behavioural change within the agricultural sector.

For example, only around 0.6% of Malta's agricultural land is currently managed under organic farming systems, one of the lowest rates in the European Union. As recognised in Malta's Action Plan for Organic Food, financial support mechanisms and subsidies are among the primary drivers encouraging farmers to transition towards organic production.

However, agricultural support schemes should not focus exclusively on organic farming. Greater attention should also be given to incentivising farmers who implement nature-



based solutions and restoration measures that enhance biodiversity and ecosystem resilience. Such measures could include the management and control of invasive alien species, habitat restoration initiatives, the creation of pollinator-friendly areas, and the adoption of bird-friendly farming practices.

The recovery potential of several farmland bird species could be significantly enhanced through the adoption of appropriate farming practices. In this regard, subsidies could be directed towards farmers implementing projects targeting specific species (e.g. Short-eared Owl, Common Kestrel, Turtle Dove, Corn Bunting, and Greater Short-toed Lark).

Such targeted actions would contribute positively to the Farmland Bird Index, a recognised biodiversity indicator that uses trends in farmland bird populations to assess the ecological condition of agricultural landscapes. The index is already used at EU level under the Common Agricultural Policy (CAP) and supports biodiversity reporting under the Birds Directive. More recently, the Nature Restoration Regulation (EU) 2024/1991 has given the indicator direct legislative relevance, with Annex V requiring Member States to achieve an increasing trend in farmland bird populations by 2030 and beyond.

With this in mind, BirdLife Malta wishes to emphasise the importance of integrating biodiversity restoration objectives within the National Agricultural Policy. This would support the achievement of national agricultural goals while ensuring coherence with Malta's obligations under the Birds Directive and the Nature Restoration Regulation.

Importantly, it would also provide a monitoring tool for determining whether environmental resilience measures introduced under the National Agricultural Policy are delivering the intended outcomes. The inclusion of the Farmland Bird Index as part of the monitoring framework would therefore strengthen evaluation of policy effectiveness and enhance alignment with European and national environmental obligations.

Concluding Remarks

While the policy actions are broadly holistic, the document lacks clear and measurable success indicators. For example, the policy places considerable emphasis on advisory and knowledge-transfer services as the primary mechanisms for achieving environmental resilience. However, without the use of measurable indicators - such as biodiversity indicators - it will be difficult to determine whether these measures are delivering tangible improvements.



BirdLife Malta therefore recommends that appropriate indicators be formally integrated into the National Agricultural Policy. This would ensure that policy implementation can be assessed against clear outcomes.