



Public Consultation Submissions & Responses

Intent for the National Strategy for the Environment and its Vision for 2050

May 2019

Environment & Resources Authority



CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Jonathan Camilleri 30/03/2019	Nirreferi ghal konsultazzjoni Intent for the National Strategy for the Environment and its Vision for 2050, fejn jidher li hem hafna djalogu fis-socjeta' fuq dan is-suggett, u d-djalogu u l-argumenti jvarjaw hafna emminni, hafna minnhom huma argumenti li kont isibhom fil-klassi jien, li mbaghad jestendu ruhhom f'esagerazzjonijiet fuq difetti tax-xoghol u kwalita' ta' bini li kultant ma jkollhomx hafna x'jaqsmu mal-ambjent hlief mill-aspett li ma nistghu naghmlu xejn fuqu bhala socjeta' moderna li accettajna l-industrijalizzazzjoni bhala filosofija progressive u li ha tibqa' timxi f'din id-direzzjonin tant li l-poloż imfasslin ma jidhirx li ha jwaqqfu lil min japprova l-permessi milli jiltqghu u jaghmlu l-analizi u l-approvazzjoni tagghom.	M'hemmx kummenti.
		Bhala mizuri ta' kontroll nahseb li dejjem tista' ticcekkja, naturalment u tiehu passi proporzjonati biex jigu trangati dawn id-difetti skond id-daqs tad-dannu, hekk qed infittxu b'retrospettiva.	Il-politika ambjentali tikkunsidra kemm mizuri ta' prevenzjoni kif ukoll ta' kontroll. Dan ser jigi addottat anke fl-Istrategija Nazzjonali, flimkien ma mizuri oħra.
		Hekk qed nibnu mill-gdid zgur li hem bzonn hsieb ta' dizinn li kemm jista' kun jalinja ruhu ma dizinn li hu accettabbli ghal awtoritajiet u preferibilmment anke ghal gar u ghal min inzerta kien ghaddej bil-mutur u laqtu xi haga hazina fil-bini minghajr ma ghandu sehem dirett fil-propjeta' tal-bini, forsi taf inti ghada jew pitghada jithajjar jikrih il-post, u allura jigi eligibbli ghal drittijiet ta' konsumatur li huma qeghdin fi http://www.mccaa.org.mt u joffru medjazzjoni arbirarja fejn ikun hem xi nuqqas ta' qbil jew iehor.	Hija nnutata l-htiega li jittejjeb il-kwalita' tal-ambjent urban.

		<p>Inhoss li hafna ghandhom id-difetti tagghom u nhoss li fl-istadju tal-innovazzjoni l-inginerija ssibha madwarek allura mhux difficili tassocja problema ma soluzzjoni, mekkanika, ta' natura civili [bini], infrastrutturali, u mizuri u progetti biex tipprezerva l-ambjent bhal per eżempju progetti tal-Arka ta' Noe li jzomm lista' ta' speci li kemm jista' jkun ma tisparax lejhom anke ghax hem l-istagun tal-kacca issa li suppost tkun infurmat bihom hekk ikollok senter licenzjat ghal dan il-passatemp u fejn inhoss li hem ftit diskriminazzjoni bhalissa ghax hawn min jista' u hawn min ma jistax mid-dehra.</p>	<p>M'hemmx kummenti.</p>
		<p>Ara l-artiklu li hem https://birdlifemalta.org/information/hunting/ bhala relazzjonijiet pubblici li huma kontrolli razzjonali biex jghinu lil kulhadd japprezza l-importanza tal-ghixien li mhux uman u ghalfejn dan isostni anke l-bzonnijiet nutrizjonali taghna.</p>	<p>M'hemmx kummenti.</p>
		<p>Hemm anke l-argumenti ekonomiċi dawn forsi jidhlu iktar fid-dettall</p> <p>Hemm anke l-argument instintiv tas-sopravivenza tal-ispeci umana u tal-prizervazzjoni tal-pjaneta dinja li taha sfond anke ghal ricerka fuq hajja fi pjaneti ohra u gab mieghu stejjer bhal hekk l-aljeni jezistux u jigux jispjajawx fuqna, onestament jien nahseb li hemm xi had ir-Russja li jhobb jiccajta bil-goff mal-Amerikani kultant.</p> <p>https://www.ufosightingsdaily.com/ xi tridhom jigu jarawlna nies minn univers iehor inti gieli ltqajt magghom nistaqsi jien b'ton naqra xettiku? u x'lingwa jtkellmu dawn ezattament?</p> <p>insomma tara hafna 'movies' fosthom issibhom fuq http://www.imdb.com, u hemm anke centri ta' ricerka malta u ghawdex u postijiet ohra li jien gieli nuri interess ghal raguni ta' mpjieg u dawn dejjem jghiduli b'ton interessanti u arroganti li qiegħed fuq xi lista twila, sewda, bajda, hadra, jew hamra ta' kandidati li jkunu qed jiflu ghal potenzjal tagghom, jien ghandi l-opinjoni tieghi ukoll onestament.</p>	<p>M'hemmx kummenti.</p>

		Nemmen li ghad ikun hawn 'networks' li jifirxu mhux biss is-satelliti biex igibu materjal ghal uzu industrijali imma li r-ricerka fuq il-protoni u l-particelli testendi ruhha biex toffri energija u struttura ghal industrija ta' ghadha, tinsieq Malta u Ghawdex zghar allura li ssiefer xi haga li forsi ggieghelek thossok qisek qed tmur post iehor biex tiehu esperjenza differenti u ssib kultura differenti minn tieghek, anke 'wildlife' u hekk taf kif.	
		Il-firxa ta' bini fit-territorju Malti u Ghawdexi hu urban u jien nara li fil-future ikun hemm iktar pontijiet bejn il-kontinenti ghal argument hekk jien irrid insalli minn Libya sa' Malta jew Ghawdex jew sar-Renju Unit insib l-ajru, l-bahar, u anke minhabba li l-bahar rasu iebssa, rotta fuq xi 'bridge' bi 'stops' u ftit sigar u hekk biex inzejnu ftit, u dan ha jgib mieghu inkwiet fuq il-hajja that il-bahar, allura nghid jien kif se nipprezervaw il-koralli?	M'hemmx kummenti.
		Hemm skejjel bhal http://www.mcast.edu.mt , li huma strukturati biex iharrgu l-professjonisti u nittamaw li dawn ilhaqqu mad-domanda tas-suq u li l-gvern malti jew il-politiku jsib mod kif jalinja l-bzonn baziku finanzjarju tal-gholi tal-hajja biex ma jkunx hem hafna inkwiet fuq kontijiet.	M'hemmx kummenti.
		Ninstab ftit imdejjaq bid-devjazzjonijiet li saru sa issa fuq il-qbil tal-klima https://www.theguardian.com/environment/2017/jun/01/donald-trump-confirms-us-will-quit-paris-climate-deal , ta' min janalizzah fl-opinjoni tieghi u x'inhil r-razzjonalita' protezzjonista wara dawn id-decizjonijiet, u x'filosofija politika qed jiehdu.	M'hemmx kummenti.

		<p>X'materjal nistghu nuzaw ghal industrija u kif jigi processat mill-manifattura? Hemm bzonn xi arrangamenti ohra? Mizuri ohra? Kif qed nilhqu l-ghanijiet wiesa' taghna?</p> <p>jien bhala referenza naqra http://www.sciencedirect.com, u siti ohra ta' ricerka.</p>	<p>Is-settur industrijali u tal-manifattura huwa wiehed mill-hafna li qiegħed jitqies bhala parti kkoncernata f'dan il-proċess.</p>
2	<p>Janina Laurent BirdLife Malta 17/05/2019</p>	<p>We welcome Malta's intentions to draft the National Strategy for the Environment & its Vision for 2050 and would like to use the opportunity to provide our recommendations that reflect our environmental vision to conserve wild birds, their habitats and biodiversity, as well as working with people towards sustainability in the use of natural resources in Malta to ensure a natural legacy is left for the next generations.</p> <p>Draft strategic objectives of the national strategy and our recommendations:</p>	<p>Comment has been noted.</p>
		<p>Ensure a better and sustainable quality of life</p> <p>1. Ensuring that the Natura 2000 network of protected areas as the cornerstone of conservation in Malta is effectively managed and safeguarded</p> <ul style="list-style-type: none"> • By updating and finalizing management plans for all terrestrial and marine Natura 2000 sites and ensuring the implementation of such plans for all sites in a participatory approach and according to defined timeframes with the aim of achieving a favourable conservation status for all listed species and habitats • By reviewing opportunities to deliver specific actions defined by existing management plans for protected sites 	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>

		<p>that are currently unmanaged and ensuring that these actions are implemented</p> <ul style="list-style-type: none"> • By reviewing currently unmanaged sites, both terrestrial and marine, in order to identify stakeholders that are able to manage these sites in partnership with relevant stakeholders • By undertaking further research on Special Areas of Conservation, including Il-Qortin tal-Magun u l-Qortin il Kbir, Ta' Isopu (Gozo) and Il-Ponta ta' San Dimitri to Wied il-Ghasri (Gozo) • By transforming and extending current Special Areas of Conservation into Special Protection Areas if breeding population threshold can be confirmed, including site 22 Il-Gzejjer ta' San Pawl (Selmunett), site 29 Il-Qortin tal-Magun u l-Qortin il Kbir, site 24 Rdumijiet ta' Malta: Ir Ramla tac-Cirkewwa sar Ramla tal Mixquqa and colony sites at Cumnija and Majjistral (these could qualify as sites for the network of SPAs in Malta) • By continuously monitoring and assessing all Natura 2000 sites, in order to ensure the boundaries of these sites are fit for purpose, and where necessary to extend them. 	
		<p>2. Restoring degraded ecosystems to full functionality and ensuring that restoration processes are in place</p> <ul style="list-style-type: none"> • By identifying key habitats (e.g. coastal wetlands, Mediterranean woodlands, garrigue) and sites to prioritise for restoration • By ensuring that actions are identified and implemented to restore these identified sites • By prioritizing restoration initiatives on Comino as the continuation of currently planned assessments and environmental objectives • By promoting the restoration of disused quarries in a sustainable and integrated way and by providing 	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>

		<p>alternative development plans that support the natural environment</p>	
		<p>3. Providing accessible green spaces</p> <ul style="list-style-type: none"> • By clearing the countryside from inappropriate signs and indications that deny the access to public paths and sites • By prioritizing and supporting stakeholder’s interests who interact with nature in a sustainable and benefitting way • By increasing natural areas in Malta e.g. by restoring abandoned build sites to their natural state and by providing opportunities for urban and community gardens with the support of functioning restoration initiatives • By designating appropriate sites applied for as public domain 	<p>The need to connect people with nature and to integrate nature within the urban fabric are intrinsic principles of the NSE for 2050.</p>
		<p>Provide clear and long-term direction for our environment</p> <p>1. Protecting Malta’s breeding and migratory species</p> <ul style="list-style-type: none"> • By providing support to develop control programmes for invasive species (depending on the location e.g. rats, feral ducks, feral cats and plant species) in other sensitive areas, especially in relations to breeding birds. Further research is needed to investigate potential impacts of pigeons and gulls on protected species. • By accurately conducting long-term monitoring and reviewing each breeding event on a case-by-case basis and providing support to carry out specific conservation actions • By expanding bird sanctuary/nature reserve areas as counter measures to the vast expanses of land where hunting and trapping is allowed • By creating connected green corridors 	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>

		<p>Set out national environmental targets</p> <p>1. Monitoring migratory birds and directly protect them from illegal extractive practices (i.e. hunting and trapping)</p> <ul style="list-style-type: none"> • By closing harmful derogations to the Nature Directives such as the unsustainable practices of bird trapping and hunting in spring from the Maltese Government • By stopping further attempts to derogate from the Birds Directive and ensuring that the Directive is fully implemented • By promoting and developing overarching research programmes, strategies and guidelines based on best-practice • By developing monitoring mechanisms to keep tabs on illegal killing of birds in cooperation with local stakeholder and, ideally developing a community-based monitoring system • By strengthening enforcement of environmental laws and transfer these to the remit of ERA, including bird protection regulations • By developing a wildlife crime unit within the Malta Police Force 	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>
		<p>2. Environmental education opportunities for children, young people and adults are improved to connect with nature and empowering them to make environmentally responsible decisions</p> <ul style="list-style-type: none"> • By increasing green school grounds to allow more opportunity for learning outside the classroom • By ensuring that all new schools are designed to have green space and by developing a transforming scheme to provide existing schools with access to green spaces for outdoor learning 	<p>One of the pillars of the NSE for 2050 will focus on enabling change, including environmental education and empowering different strata of society.</p>

		<ul style="list-style-type: none"> • By providing more teacher-training opportunities on a national scale, including secondary and university level 	
		<p>Integrate and synergise efforts of all policies and stakeholders who directly or indirectly influence the state of our environment</p> <p>All urban and rural productive activities and developments are integrated with conservation and respect traditional landscapes</p> <ul style="list-style-type: none"> • By establishing that recommendations from ERA have more weight during decision-making and by giving ERA the option to veto against planning applications after examining their potential environmental impacts • By monitoring that initiatives proposed in sensitive areas go through the appropriate assessment procedure and by stopping harmful developments in the early stages of the application process • By taking a precautionary principle approach in advising against any form of development in Natura 2000 sites, while being sensitive to buffer areas to these priority sites • By listening carefully to and taking into account the recommendations from environmental organisations on urban and rural development proposals that are applied for with the governmental authorities and by providing feedback on these public consultations to the stakeholders with regard to the extent their recommendations were considered • By properly monitoring mitigation measures and permit conditions during construction and operational phase of proposed developments • By conserving and promoting traditional landscapes, and engaging stakeholders in environmentally friendly productive activities that maintain an abundant and 	<p>It is recognised that the success of any environmental measures is strongly dependent on the efficient and effective collaboration between policy makers, stakeholders, business, citizens and all components of society. This is therefore being given due consideration in the development of the Strategy.</p>

		<p>diverse range of habitats and wildlife (e.g. organic agriculture, high nature value farming, ecotourism)</p> <ul style="list-style-type: none"> • Better environmental policy integration in the fields of transport and infrastructure • By adopting a national light pollution policy scheme to minimize light pollution and corresponding threats to the natural environment • By revising, improving and adopting maritime policy and legislation with a view of reducing disturbance to seabirds and other protected species. This is particularly important during the seabird breeding seasons, when such birds are most susceptible to boat-based disturbances of light, noise and air pollution generated by fumes • By better controlling air pollution generated at and setting up reduction measures, such as officially supporting the designation of the Mediterranean Sea as a combined SECA and NECA by 2020 and recommending to put a strong focus on the reduction of air pollutants emitted from ships in territorial waters • By providing safe bicycle lanes, outdoor walking routes, picnic areas, camping sites and other outdoor infrastructures to provide opportunities for people to enjoy Malta's natural areas in a sustainable and regenerative way • By ensuring that the transport network is not damaging the natural environment • By strongly integrating socio-economic growth with environmental objectives 	
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		<p>Address the main environmental challenges Malta is facing</p> <p>Conservation of birds: Although an ecosystem approach is generally recommended for conservation initiatives, the situation in Malta requires actions that specifically target sensitive species. For the conservation of birds, the importance of Malta in the Central Mediterranean Flyway offers an exceptional opportunity to observe and study migrating birds, which needs to be recognized for its added biodiversity value to our islands. Additionally, it is worth mentioning as a major challenge, that besides hunting, migratory birds face countless dangers: destruction and degradation of habitats, loss of critical stopover sites such as coastal wetlands, illegal killing, poisoning, pollution, and collisions with badly-sited infrastructure like power lines and lit-up sites along the coast leading to intense light pollution. Sectors that affect migratory birds the most are agriculture, energy, hunting, tourism and waste management. As a separate point, we would like to highlight that BirdLife Malta staff has encountered the threat of seabird casualties as a result of illegal hunting at sea.</p>	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>
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		<p>Invasive alien species: The problem of invasive species and the need to control them – especially with respect to the impact caused by rodents at various seabird colony sites – is a threat that needs immediate and long-term attention at sensitive sites. While sites such as Rđum tal-Madonna SPA remain controlled, various other sites such as newly discovered seabird colonies require attention. The need to setup rodent control plans at various SPA sites in the long term will need to be addressed in the coming years accordingly. In connection to discharging or unloading waste and increasing tourism on Malta especially at remote and sensitive sites the pressure of invasive alien species has become more intense and will increase in the future; this needs to be tackled with a strategic approach.</p>	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>
		<p>Seabird bycatch: It is estimated that at least 200,000 seabirds are accidentally caught annually in EU waters, including species on the verge of extinction. For the Mediterranean Sea, there is a sparse and low scientific data reliability of seabird bycatch that leads to governments not taking action on seabird bycatch. From our regional BirdLife partners, data is available that shows the critically endangered Balearic shearwater, and the vulnerable Yelkouan Shearwater and Scopoli’s shearwater, are regularly caught in pelagic and demersal longline fishery. The lack of data for Maltese territorial waters needs to be tackled in order to assure that fishing techniques are sustainable and do not cause a threat to protected species. As for now, not a single EU Member States has a national programme that is collecting systematic data on seabird bycatch which should be included in national environmental targets in our view. Fishing is a planned activity that also takes place in marine Natura 2000 sites, whereas bycatching seabirds is considered a deliberate act under the Birds Directive - this means appropriate assessments should be carried</p>	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>

		<p>out according to EU legislation to ensure that seabirds are protected especially in Marine Protected Areas and appropriate measures need to be formulated to ensure that fishing is not conflicting with the protection of the marine environment.</p>	
		<p>Gaps in controlling measures: Electronic logbooks from fishing vessels do not have systems in place to record seabird bycatch, not all vessels have VMS – in particular small scale, and from our observations, inspectors generally do not control for seabird bycatch mitigation measures. This poses a threat not only to seabirds but also to other bycaught species in our waters.</p>	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>
		<p>Threat from marine litter The impact of marine litter is widely documented in international studies and research projects with more recent research pointing to the problem of micro-plastic materials entering the food chain and accumulating within species at the top of the food-chain such as seabirds. While largely unknown, every possibility should be expended to gather information about the severity and impact caused by plastic pollution on Malta’s marine life. Concrete goals need to be formulated to eliminate plastics and micro-plastics entries into the Mediterranean especially from Malta’s shores.</p>	<p>Comments have been noted and will be taken into consideration during the drafting of measures of the NSE and/or the specific topic-related policy, in collaboration with all relevant stakeholders.</p>
		<p>Marine Spatial Planning Process: For a spatial plan to be effective there needs to be comprehensive data and modelling of habitats and species activity in the context of specific ecosystems. We recommend a review of the current available data and information to understand data gaps and what further data collection is needed. Mapping the sensitivity of threats and human pressures that species and habitats face in Malta’s territorial waters enables the identification of the best places to allocate human activities. Some areas might already be designated as Natura 2000/ Marine Protected Areas such as fishing and aquaculture, posing potential threats to the marine</p>	<p>The development of Malta’s Marine Spatial Plan is led by the Planning Authority. ERA is following this process and contributing to it.</p>

		<p>wildlife. For seabirds, those areas were designated because of high congregation areas (colonies, foraging or rafting sites). However, the areas do not account for migratory flyways or for “foraging trips”. Therefore, mapping the sensitivity to different pressures would enable to understand the impact certain activities might have on a population of seabirds that is not just breeding or rafting in the area, but also taking several foraging trips to feeding grounds. This includes for instance aquaculture activities with a focus on changing behavior of seabird movements. A marine spatial plan should propose an allocation of areas for different human activities depending on the least amount of ecological impacts, especially in MPAs. Before adopting a final marine spatial plan, a Strategic Environmental Assessment of allocated areas should be undertaken that determines the extent of the environmental impact of the plan and if needed, adjustments have to be made. Once a marine spatial plan has been adopted, permits for activities shall normally only be requested within these allocated areas. However, Appropriate Assessments (for Natura 2000 sites) or Environmental Impact Assessments (for other MPAs) are to be undertaken where planning permits have been requested and this can have a significant effect on any site integrity. Permits should then be given where Appropriate Assessments/Environmental Impact Assessments determine that these projects will not have a significant effect on the conservation objectives of the species and habitats (i.e. site integrity). The cumulative impacts of threats should also be a component of Strategic Environmental Assessments, Marine Spatial Plans, and Appropriate Assessments in order to take account of in-combination and cumulative effects of existing and proposed projects in the context of the current, already degraded status of the marine environment. In this regard, attention has to be drawn to the implementation of the Blue Growth Initiative and</p>	
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		<p>the Integrated Maritime Policy, initiated by the EU, which might cause conflicts among stakeholders with interests over the same region.</p>	
		<p>Planning process and planning applications: The Maltese territory is suffering from significant pressures arising because of the fastest population growth in the EU. Besides having the highest population density in the EU, this is accompanied with the interest shown by the Maltese government to increase the population provided the economic growth is maintained. Population growth leads to an increase need for accommodation, social and physical infrastructure creating pressures that have an effect on many people’s physical and mental wellbeing. Likewise, overdevelopment has a tremendous negative impact on the biodiversity and the natural environment due to land uptake. Among EU countries, Malta ranks fourth in terms of urban sprawl, also featuring the least proportion on land uptake per person. Natural areas are rare, and Malta’s surface has been build up to a great extent (30% is artificially covered). Still, development permissions are increasingly converting pristine land into covered one. Due to weak and poorly implemented policy frameworks besides a civic voice that is disregarded in decisions-making processes, many planning applications are approved adding on to urban sprawl and further up-take of natural areas.</p>	<p>The environmental pressures resulting from Malta’s population density and the fact that land is a precious resource in an island as small as ours are recognised.</p>
3	<p>Simone Vella Lenicker Kamra tal-Periti 19/05/2019</p>	<p>The following are the consultation questions, and the Kamra’s corresponding answers:</p> <p>1. Do you agree with the proposed overarching objectives of the Strategy?</p> <p>The proposed objectives are generally positive, although it is noted that the term “environment” itself is not actually defined</p>	<p>Comment has been noted. ERA is guided by the definition of the environment in the EPA.</p>

		<p>in the consultation text. The Environment Protection Act (Chapter 549 of the Laws of Malta), defines the "environment" as “the whole of the elements and conditions, natural or man-made, whether together or in isolation, and in particular:</p> <p>(a) the air, water, land, soil and sea, including their bedrock, aquifers and subsurface features;</p> <p>(b) all the layers of the atmosphere;</p> <p>(c) all biodiversity; and</p> <p>(d) the landscape and its features.”</p> <p>This definition is wide-ranging, and encompasses various factors which have a direct, and often serious, impact on our quality of life. Thus, it is the opinion of the Kamra that this Strategy cannot be formulated unless there is consensus across the board.</p>	
		<p>Integrated Governance is key to the success of the Strategy, and requires that overarching policy direction and all sectoral Government policies are aligned, including, but certainly not limited to, policies related to the economy, planning, transport, tourism, education, health, water and energy, industry, and agriculture.</p> <p>The Kamra is therefore of the opinion that a Policy Coordination Unit should be established without delay within the Office of the Prime Minister, to ensure that all policies which are currently being drafted are coherent with, and have the same objectives as, the proposed Strategy.</p>	<p>It is recognised that environmental issues are of a horizontal nature which require alignment across various sectors. This, together with these comments, will be taken into consideration in the development of the Strategy.</p>

		<p>It is also noted that the Strategic Plan for the Environment and Development (SPED) is now reaching the end of its intended lifetime, and there is no doubt that this Strategic Plan has failed. The Vision for the SPED, outlined in Section 1.27 thereof, outlines a number of targets.</p> <p>A long list of ambitious and extensive targets. Sadly, most, if not all, of these targets have scarcely been addressed, let alone achieved. It is further disheartening to note that, in some cases, we have only managed to achieve negative results in certain targets, with rapidly deteriorating urban environments leading to community alienation and the disintegration of traditional community support structures, urban development further feeding into scarce green public open space, deteriorating air and water quality, severe mobility issues and growing threats to Gozo's potential as an ecological island.</p> <p>The current consultation process does not specify whether the proposed Strategy is intended to work alongside the SPED or to replace the SPED in its entirety or in part. In the latter case, it is unclear as to how the respective policy documents will be handled together. Translating the targets of the Strategy into spatial terms is an essential aspect of its success or failure, and this reinforces our opinion that it cannot be formulated in isolation from other policies. Unless the Strategy is translated into spatial planning policies, it will be nothing but subservient to them.</p>	<p>The role of the NSE is being developed in recognition of all existing national policy, including SPED, and it is appreciated that the detailed analysis of how these may be synergised is an important step in the NSE development process.</p>
		<p>Measurability will be key to the credibility and success of the Strategy. This requires the establishment of a clear integrated framework of specific indicators across a broad spectrum of environmental criteria, against which one can establish a clear baseline, establish targets for improvement, and measure regular progress. The European Union's Reference Framework for</p>	<p>Comment has been noted. It is agreed that appropriate monitoring and evaluation of the performance of the Strategy is crucial. To contribute to this, strong links between the Strategy and the State of the Environment reporting process are being developed.</p>

		<p>Sustainable Cities (http://rfsc.eu/european-challenges/) can provide a basis for such an integrated framework.</p>	
		<p>2. Can the objectives be further refined, keeping in mind the long-term goal of this Strategy till 2050?</p> <p>Just like the dire need for a clear definition of the term ‘environment’, the objectives identified as part of this consultation process need to be defined not only within the local context, but also reflecting recent developments since the SPED (and possibly using the now superseded 2015 State of the Environment Report). The question as to what constitutes a sustainable quality of life needs further elaboration. Without a common and agreed definition of ‘quality of life’, tied to a set of measurable indicators, there is the risk of being too aspirational and in turn, ineffective.</p>	<p>The NSE process is exploring the components of quality of life as defined by Eurostat and environmental wellbeing. Their understanding is being sought both within the local and international contexts and developments. The strategy is also being developed on an ongoing understanding of Malta’s environmental issues, following up on the discussion presented in the 2015 State of the Environment Report.</p>
		<p>The objectives of the Strategy need to include a review of existing ‘environment’ policies, those that have been drafted before from a strictly environmental perspective (e.g. National Environment Policy), as well as those policies in other sectoral policy documents (e.g. energy, transport, agriculture, water, and so on) that have an environmental impact.</p>	<p>The role of the NSE is being developed in recognition of all existing national policy, and the detailed analysis of how these may be synergised is an important step in the NSE development process.</p>
		<p>The long-term goal of this Strategy should be seen as an opportunity to first develop a vision and then a strategy with strict timeframes for delivery of measures and achievement of targets. It seems from the consultation document that the terms vision and strategy are used without much consideration of their meaning and value to the process. Strategy, with defined short, medium and long-term objectives, should follow a long-term vision, taking us to 2050.</p>	<p>This is agreed, as it is the process that ERA is adopting. ERA will first publish a Vision for 2050, building on an extensive scenario analysis exercise. This shall then be followed by the development of the National Strategy, which shall include various objectives and targets.</p>

		<p>3. What aspects do you retain to be crucial to consider in the vision for 2050?</p> <p>The failure to uphold the SPED objectives stem from a number of factors, primarily the lack of institutional capacity for integrating and supporting environmental concerns in aspects of development planning, transport, agriculture, water and other sectors, but also the prioritisation of short term politically driven policy over long term institutional and public commitment to address the impending environmental risks these islands are facing. Planning practices, underpinned by poor forward spatial planning, and a misguided drive to approach planning only as. The lack of land use planning and the practice of development control need to be separated as evidently their “institutional integration” have failed us. Planning is a necessity - a failure to plan is a perfect plan to fail - planning is therefore a crucial aspect of the Strategy.</p>	<p>Comment has been noted. ERA is aware of the careful planning that is required and this is being duly considered in the procedure being adopted for the development of this Strategy.</p>
		<p>Some of the issues that are considered crucial for consideration in the 2050 vision include:</p> <ul style="list-style-type: none"> • Urban environmental improvement including urban greening, but also better designed development (building and infrastructure) with a higher standard of materials, construction and energy use; • Reduced air and noise pollution; • An effective, environment friendly, energy efficient public transport system and a strategy for mobility; • Improved infrastructure for pedestrians and cyclists, also as a means for promoting healthier lifestyles; • The protection of rural land, peri-urban areas, natural habitats and the coastal zone, as well as open spaces within the development zone; • A proper assessment of the effects and impacts of land reclamation on the environment, available resources, and the country’s main economic sectors; 	<p>Comments have been noted and will be taken into consideration during the drafting of the objectives and measures, in collaboration with all relevant stakeholders.</p>

		<ul style="list-style-type: none"> • Waste management; • Water resources; • Valorisation of globigerina limestone as a finite and scarce resource and its use in a sustainable manner; • Education; • Sustainability of our biodiversity; • The impacts of, and measures to adapt to climate change; • The promotion of sustainable agriculture and fisheries practices and the quality of food produce. 	
		<p>4. What parallel developments would you expect to see to enable a sustainable quality of life?</p> <p>At the UIA (Union des Architectes) Congress which took place in Durban (South Africa) in August 2014, UIA member organisations, including the Kamra tal-Periti, and the architecture councils of Europe, Asia, the Americas, and Africa, representing architects in 124 countries worldwide, unanimously adopted a historic Declaration committing themselves to promote environmental and social sustainability in the built environment.</p> <p>The Declaration on the 2050 Imperative recalls that urban areas are responsible for over 70% of global energy consumption and CO₂ emissions, mostly from buildings. Through this Declaration, the world’s community of architects recognised the urgency of fighting climate change by setting the global building sector on a path to phase out CO₂ emissions by 2050. The architectural profession also emphasised its central role in planning and designing sustainable, resilient, carbon-neutral and healthy built environments.</p> <p>By supporting this initiative, the Kamra tal-Periti, along with all signatories, committed to promote the following actions:</p>	<p>The information provided is noted.</p>

		<ul style="list-style-type: none"> • Plan and design cities, towns, urban developments and new buildings to be carbon neutral; • Renovate and rehabilitate existing cities, towns, urban redevelopments and buildings to be carbon neutral whilst respecting cultural and heritage values; • In those cases where reaching carbon neutrality is not feasible or practical, plan and design cities, towns, urban developments, new buildings and renovations to be highly efficient with the capability to produce, or import, all of their energy from renewable energy sources in the future; • Engage in research and setting targets towards meeting the 2050 goal; • Advocate and promote socially responsible architecture for the community, develop and deliver equitable access to the information and tools to deliver these objectives. <p>These targets should be integrated within the National Strategy for the Environment, and undertaken in parallel with it.</p>	
		<p>The National Strategy should also be aligned with the UN's Sustainable Development Goals – anything short of this would be a futile attempt at achieving a sustainable quality of life.</p>	<p>The NSE is being drafted in recognition of the strategic direction established by the UN's SDGs and EU's 7th EAP and upcoming 8th EAP.</p>
		<p>In addition, the following parallel developments should be undertaken:</p> <ul style="list-style-type: none"> • Enshrining the right to a healthy environment in the Constitution; • The proper costing of environmental capital replacing the standard cost-benefit approach to any development (especially infrastructure); • Formulation of a National Landscape Policy; • Formulation of a National Policy for Architecture; • Integration of sectoral policies driven by effective planning; 	<p>Comments have been noted and will be taken into consideration during the drafting of measures, in collaboration with all relevant stakeholders.</p>

		<ul style="list-style-type: none"> • Effective institutional set up; • Consistent discourse and action, in line with sustainable development principles (which can only be achieved through the last two above points); • Stronger legal structures to curb actions that harm the environment and in turn impact public health, including criminal action. 	
		<p>5. What are in your opinion Malta’s main environmental challenges in the next 30 years?</p> <p>The following is a non-exhaustive list of what, in the Kamra’s opinion, are the main environmental challenges Malta will be facing in the next 30 years:</p> <ol style="list-style-type: none"> 1. Achieving an across the board mind-set for a complete cultural and institutional commitment to a better environment, and for the prioritisation of the environment above any more expedient, even if more politically desirable, goals; 2. Institutional capacity, institutional conflict, and remit, and the inability or unwillingness of institutions to appreciate the economic and cultural import of heritage and environment assets for the advancement of society; 3. The quality of the urban realm, including the importance and accessibility of the public realm (public roads, open spaces and gardens within our localities) as environmental assets of value to the community and as an essential contributor to our quality of life, the greening of the urban realm, a significant reduction of traffic volumes and speeds within core areas in order to reassign public space for community interaction, leisure activities and enjoyment; 4. Full protection of the irreplaceable natural landscape; 	<p>Comments have been noted.</p>

		<ol style="list-style-type: none"> 5. Sustainability of agricultural and fishing activities, and issues relating to food security; 6. Population growth (both permanent and temporary), urban density, and the carrying capacities of our towns and villages; 7. Achieving a sustainable, environment-friendly, energy efficient, multi-modal transport system and its infrastructure, that contributes to rather than detracts from environmental quality, improved convenience for commuters and national economic advancement; 8. Protection (and cleaning) of the sea bed around the islands, and the protection of the natural habitats of the sea; 9. Protection and enhancement of our biodiversity; 10. Reducing noise and air pollution; 11. Effective waste management including effective waste reduction strategies (not burning waste!), obligatory recycling with effective enforcement, stricter procedures (including the use of criminal actions) against perpetrators and recidivists (which in the environmental waste sector are many); 12. Water resources; 13. Valorising natural stone as a rare, unique and cultural asset and resource, its protection and use in sustainable manner. 	
4	<p>Marie-Therese Camenzuli Kummissjoni Interdjoċesana Ambjent 19/05/2019</p>	<p>The KA hopes that the proposed National Strategy for the Environment (NSE) is a subset of the Malta's Sustainable Development Vision for 2050 proposed by the Ministry for Sustainable Development, Environment and Climate Change (MSDEC) and not a standalone. If proposed as a standalone, the KA fears that if NSE is not strongly embedded in Malta's Sustainable Vision, issues related to the environment would be easily side-lined and ignored because of the alas too familiar</p>	<p>The role of the NSE is being developed in recognition of all existing national policy, including Malta's Sustainable Development Strategy, and the detailed analysis of how these may be synergised is an important step in the NSE development process.</p>

		<p><i>“overarching national priorities”</i>. The NSE should be focused on stressing and consolidating the environmental pillar in every discourse of development that is deemed to be sustainable. The KA had also outlined this Achilles’ heel in the <i>National Environment Policy for the years 2011- 2020</i>. Unfortunately, these recommendations have apparently not been taken up, with quite visible consequences to the achievement of the policies outlined in the Plan.</p>	
		<p>The environmental pillar can only be strengthened IF</p> <ul style="list-style-type: none"> • The NSE shapes and becomes part and parcel of the Strategic Plan for the Environment and Development (SPED) which, in turn, needs to be reviewed as a matter of urgency to give more emphasis on environmental sustainability. • The “preparation of plans, policies and programmes issued under the (Environment Protection) Act or under any other Act related to the protection and sustainable management of the environment” are not overruled by development plans and policies issued under the Development Planning Act. It is futile to have one arm of Government trying to do something in favour of environmental sustainability while another arm is very busy twisting this arm and ensuring that only lip service is given to the environment. • There is a review of the Development Planning Act and its subsidiary legislation to give space to the Environment Protection Act to exert effectively its influence in shaping environmental sustainability in the country. This means that the Environment Resources Authority should have a veto on specific types of development applications especially those that are submitted for areas that are outside development zones. 	<p>Comments have been noted. The role of the NSE is being developed in recognition of all existing national policy, and the detailed analysis of how these may be synergised is an important step in the NSE development process.</p>

		<ul style="list-style-type: none"> • A review of development plans and policies (especially the Rural Policy and Design Guidance and the Fuel Stations Policy) under the Development Planning Act is carried out as a matter of urgency in order to primarily safeguard the outside development zones and rural areas from indiscriminate and abusive development. 	
		<p>The country just cannot wait for yet another “vision” or “strategy” to be drawn up while it is obvious what concrete and urgent measures need to be taken now to halt and possibly reverse trends in environmental degradation in the Maltese Islands. The drawing up of NSE runs the risk of being seen as an attempt by Government to do something while at the same time giving plenty of time and space for those who want to exploit the environment. This approach has been amply clear in the process that was adopted in the review of the Fuel Stations Policy.</p>	<p>The development of the NSE Vision and the subsequent strategy aims to provide the national strategic lattice for the ongoing development and implementation of environment targeted policy and regulations across all administrative bodies. Environmental challenges will nonetheless continue to be addressed during its preparation and after it is published.</p>
		<p>Do you agree with the proposed overarching objectives of the Strategy?</p> <p>The KA agrees with the proposed overarching objectives, but what the document proposes are goals which by their very nature tend to be broad. By definition, objectives should be more specific, hence clearly outlining how the goals will be achieved. Reactions to the overarching objectives outlined in the NSE:</p> <ul style="list-style-type: none"> • Ensure a better and sustainable quality of life – ideally “better” and “sustainable” quality of life should be defined in terms of (for example) health, safety, respect for biodiversity and the role of humans in the ecosystem. 	<p>Comments have been noted. The aim of the Strategy is to develop long-term objectives and milestone targets which specify the goals that are to be reached by 2050.</p>

		<ul style="list-style-type: none"> • Provide clear and long-term direction for our environment – as explained above, this can be achieved if a list of concrete and focused objectives is identified. • Set out national environmental targets – this can be achieved if environmental issues are given priority in development plans; restoring degraded habitats/environments; and conserve/protect ecosystems particularly those that are in danger. • Address the main environmental challenges Malta is facing – this can be truly be achieved by enforcing environmental protection laws and effectively barring actions that jeopardise environmental quality. • Integrate and synergise efforts of all policies and stakeholders who directly or indirectly influence the state of our environment –in this respect, each and every Government Ministry should express a sense of ownership of the NSE and should be committed to the realisation of such goal. 	
		<p>Can the objectives be further refined, keeping in mind the long-term goal of this Strategy till 2050?</p> <p>As mentioned above, these objectives need to be made more specific, focused and action oriented. They should be organised by themes and related time periods (i.e. a timeline). This would help in making the great time interval identified by NSE more concrete and hence doable.</p>	<p>The NSE is still in a preliminary phase of development. Following development of the Vision document, detailed objectives and measures will be drafted for 10-year periods, (i.e. until 2030, 2040 and 2050). An action plan will also accompany the Strategy, consisting of timeframes, budgets and responsibilities for each of the measures, to ensure that the Strategy is a workable plan of action with clear parameters for its implementation.</p>
		<p>What aspects do you retain to be crucial to consider in the vision for 2050?</p>	<p>Comments have been noted.</p>

		<p>(a) establishing the principle of carrying capacity as a way of identifying limits to growth and set appropriate truly sustainable targets; and (b) the unequivocal identification of actions/policies harming the environment and taking concrete actions to stop them. Otherwise all this environmental discourse would be just rhetoric.</p>	
		<p>What parallel developments would you expect to see to enable a sustainable quality of life?</p> <p>(a) An ongoing educational campaign targeting various sectors of society. It is important to note that educational campaigns are not a synonym of communication / information campaigns. While the latter stresses the transfer of information and maybe awareness raising, the former targets behavioural change.</p> <p>(b) Wide ownership of the NSE objectives can be achieved by ensuring true public consultation about environmental issues. This can be achieved by: (i) the publication of reports (in their entirety); (ii) making the reports accessible to the non-technical public; (iii) approaching public consultations not as information meetings presenting a fait accompli; and (iv) taking decisions on the basis of such consultation process.</p> <p>(c) Official recognition of the environmental pillar in debates about development by extending the remit of the Malta Council for Economic and Social Development (MCESD) to formally consider environmental issues in their deliberations. This would entail renaming the Council to Malta Council for Sustainable Development (MCSD)</p> <p>(d) Getting support for and involvement in the NSE of ALL Government Ministries.</p>	<p>One of the pillars of the NSE for 2050 will focus on enabling change, including environmental education and empowering different strata of society to target behavioural changes. It is also recognised that environmental issues are of a horizontal nature which require alignment across various sectors.</p>

		<p>What are in your opinion Malta's main environmental challenges in the next 30 years?</p> <p>(a) curbing the unrestrained construction industry; (b) controlling the number of vehicles on our roads; (c) addressing issues which are causing degradation in air quality and consequently to the well being of all; (d) token participation re public consultations; (e) extending waste management beyond households to include industry and businesses; (f) halting the policy of overprotection and active promotion of developers and business interests over the common good resulting in procrastination in decision taking on crucial matters; (g) safeguarding biodiversity and (h) addressing issues related to water consumption in our islands.</p>	<p>Comments have been noted and will be taken into consideration during the drafting of objectives and measures, in collaboration with all relevant stakeholders.</p>
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