



# Public Consultation Submissions & Responses

## Conservation Objectives and Measures for Malta's Terrestrial Natura 2000 Sites – Set 1

December 2024

Environment & Resources Authority

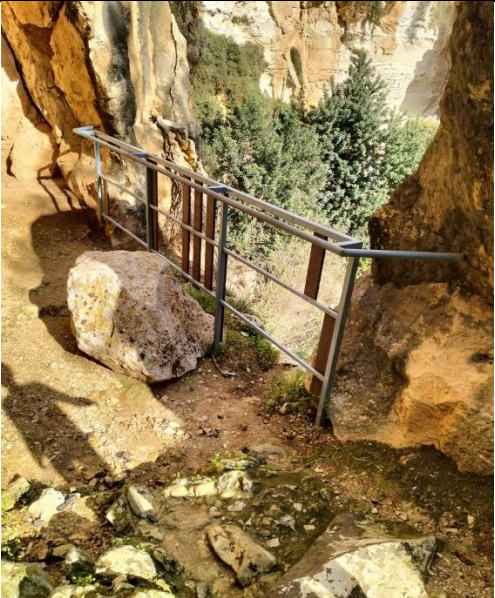


## CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Jes Farrugia 25/10/2024	To conserve implies to retain in the present state. That is exactly what needs to be done - minimal intervention. This however, needs to be managed by people on the ground. A joint effort between the Rangers working North and North West Malta and (better resourced) police working 24/7 with the right support will surely be a success as can be seen at the Majjistral Park, which is enjoyed by different people with different perspectives.	<p>For those habitats and species which are found in a good conservation status, the objective is indeed to maintain such status where no direct conservation efforts are required. Meanwhile, for those habitats and species which are found in a bad conservation status due to known pressures being exerted on that particular habitat and/or species, direct interventions are required (such as the removal/control of invasive alien species, control of access within sensitive areas etc.) to ensure that their conservation status is improved.</p> <p>Since its inception, ERA has made significant progress in allocating both human and financial resources towards the efficient management and administration of Natura 2000 sites. This not only constituted of an enhanced Environment &amp; Resources Directorate, but also the establishment of a Regulatory Affairs Directorate – these further demonstrate the commitment to better policy processes and their implementation, as well as enforcing compliance of activities and measures within Natura 2000 sites.</p> <p>Meanwhile, ERA ensures continuous collaboration with relevant Ministries and entities, such as Ambjent Malta, as well as non-governmental organisations (NGOs) to ensure the timely and coherent execution of relevant measures. A number of management agreements are already in place with NGOs for the majority of the sites included in this public consultation, which NGOs have been throughout the years effectively managing the sites in question. A notable example is indeed the work that is being carried out by Heritage Parks Federation for Majjistral Park.</p>

2	Tamsin Caruana 26/10/2024	<p>The first thing that is needed is a qualified and/or experienced Protected Area Manager for each protected area. These environmental experts need to decide what actions need to be implemented that are beneficial to the local community and the local wildlife based on the management plans that ERA wrote and that will need now need to updated since management plans need to be updated every few years. Then funds will need to be injected into these areas to implement these actions.</p> <p>It is also very important to allow a good wage for protected area managers otherwise qualified and experienced people will not be able to afford to work in these important positions. Talking from experience as I worked for Nature Trust as a protected area manager of Wied Ghollieqa and Pembroke. I also have a MSc in Protected Area Management.</p> <p>I now work for the Malta Environment Foundation which gives micro grants to environmental initiatives. We may be able to help out with some resources.</p>	<p>ERA notes and welcomes the efforts by the Malta Environment Foundation in relation to environmental initiatives to NGOs and other parties.</p> <p>Since its inception, ERA has made significant progress in allocating both human and financial resources towards the efficient management and administration of Natura 2000 sites. ERA ensures continuous collaboration with relevant Ministries and entities, such as Ambjent Malta, as well as non-governmental organisations (NGOs) to ensure the timely and coherent execution of relevant measures. Management agreements are already in place with non-governmental organisations (NGOs) for the majority of the sites included in this public consultation, which NGOs who have been throughout the years effectively managing the sites in question.</p>
3	Maria Schembri 28/10/2024	<p>Why are Regulation 17 of the Flora, Fauna and natural habitants Protection Regulations 2006 SL 547.44 not adhered to in regards to the confirmation of a site manager at the Maqluba, the locations maintenance, as well as the Flora and Fauna maintenance within the doline. Have the education publication been published?</p> <p>The Maqluba site lacks proper Health and safety measure for its visitors - Signage and additional safety railings</p>	<p>Regulation 17 is being adhered to as the management of the Maqluba Natura 2000 site falls under the responsibility of Ambjent Malta as site manager. While the issues raised are understood, it is important to note the challenges that the site faces including limited accessibility, health and safety aspects, and the feasibility in the implementation of measures (such as theremoval/control of invasive alien species within the doline). Regarding communication, education and public awareness, the relevant entities have embarked on various initiatives across the years catering for relevant subject matters. These initiatives are part of a nationwide effort to ensure the long-term successful management of Malta's terrestrial Natura 2000 sites.</p> <p>Comments raised regarding health and safety measures and storm water run-off management are duly noted. Refer also to the feedback above.</p>

		<p>The doline requires a proper Storm Water run off management. ie regards to ground erosion in the belvedere and its different levels</p> <p>The Maqluba trees are in an urgent need of pruning and especially in regards to the invasive Ghollieqa that suffocate the carob trees and poses as a safety hazard</p> <p>The "upper landing" is full of soil brought to the site by the rains that have even covered the footpath to the belvedere and destroyed the stone steps</p> <p>Both stairways need attention in regards to its safety to visitors.</p> <p>the belvedere needs appropriate steps and railing from the close level to that furthest in</p> <p>A CCTV surveillance of the belvedere would benefit all</p>	<p>Meanwhile, it is to be kept in mind that the draft policy document consists of site-specific conservation objectives and measures focussing primarily on the conservation of the habitats and species for which the site was designated.</p> <p>Measures related to the overall site maintenance/management, visitor management and public awareness and education for the terrestrial Natura 2000 sites will be covered in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p>
4	David Camilleri 13/11/2024	<p>Qed nissottometti proposta li tmur inhoss hija importanti f'dan il-kuntest allavolja l-iskop taghha imur ftit lil'hinn mill-iskiop tal-konsultazzjoni pubblika. Inhoss li ir-rejaltajiet taz-zmien u il-persjonijiet diversi li hemm fuq din l-assi importanti ma' thallix triq ohra ghajr li dawn is-siti ferm importanti (u anke possibilment l-art ODZ) ikunu 'managed' minn lenti iktar 'holistika' u f'kuntest ta' "best use" policy, Dan huwa kritiku jekk verament irridu bhala pajjiz inharsu l-ambjent naturali ta' madwarna u nassiguraw li din l-assi tigi uzata bl-ahjar mod possibbli u sostenibbli</p>	<p>Il-proposta li ssottomettejt giet innotata, u se tigi evalwata u kkunsidrata kif inhu relevanti. Importanti li wiehed jagħmel referenza għall-Istrategġija u Pjan ta' Azzjoni Nazzjonali tal-Bijodiversità, li tinkludi din l-Azzjoni:</p> <p><i>ACTION 22.2: An NBSAP Forum is organised annually to share progress and ensure stronger collaboration between key stakeholders involved in the NBSAP implementation</i></p>

5	<p>David M Schembri</p> <p>Qrendi Local Council</p> <p>17/11/2024</p>	 <p>Photo shows the current state of the viewing gallery at the Maqluba Natura site in Qrendi.</p> <p>Despite the 2016\17 consultations, several concerns as regards to the site management and its Safety, are still unaddressed.</p> <p>“Why are consultation meetings between the “site manager and its stakeholders” not being held, or at least on a regular basis?”</p> <p>Who is responsible for the upkeep of the Maqluba as well as for its financing?</p>	<p>ERA takes note of the concerns raised and is open to discuss this matter further, with relevant stakeholders, including Ambjent Malta, the entity responsible for the management of this Natura 2000 site. During the public consultation meeting, ERA had also informed Qrendi Local Council to communicate with Ambjent Malta as the site manager.</p>
6	<p>Sharon Sultana</p> <p>Heritage Malta</p>	<p>With reference to the Conservation Objectives and measures for Malta’s Terrestrial Natura 2000 sites Set 1- consultation document, Heritage Malta, as the main stakeholder for Għar Dalam would like to make the following observations which require amending.</p>	<p>The heading <b>‘Caves not open to the public’</b> is the standard name for this particular habitat type (Code: Habitat 8310), as indicated in the EU Habitats Directive and cannot be amended. Nevertheless, it is pointed out that not all of the cave in question is open to the public.</p>

03/12/2024	<p>Pg.94: there is a mistake since this table is under the heading of ‘the cave which is closed to the public’. At the same time the document is referring to limiting the number of visitors to 55. Kindly note that the 55 visitors are only allowed in the open part of the cave, and therefore this needs to be removed from this section.</p>	<p>The policy document is indeed referring to limiting the number of visitors to 55 for the area, which is only allowed in the open part of the cave.</p>
	<p>Pg.97: <i>Noting that Armadillidium ghardalamensis occurs only within this site and has a low population, a study to determine the feasibility of carrying out ex-situ conservation would be essential in an attempt to enhance the current population of the species.</i></p> <p>Such a study is to be led by Heritage Malta as the holder of the property in close collaboration with ERA. Kindly note that Senior Curator of the National Museum of Natural History, Mr John J. Borg (also responsible for Għar Dalam), has already submitted a request for permission to carry out a two-year study on <i>A. ghardalamensis</i>.</p>	<p>ERA has been identified as the lead responsible for all those operational objectives which include the carrying out of further studies to improve knowledge on the distribution and population size of the species. Notwithstanding this, ERA will collaborate with relevant entities, as deemed necessary, for the execution of these operational objectives.</p>
	<p>Pg. 99-100: <i>Rhinolophus hipposideros</i></p> <p>Please note that the species in question has been monitored by observation by the Senior Curator of the National Museum of Natural History, Mr John J. Borg (also responsible for Għar Dalam) for the past years. The data gathered is available and ERA are more than welcome to discuss further with Heritage Malta in this regard. The table below reflects this.</p> <p>To undertake study: Lead Heritage Malta in close collaboration with ERA.</p>	<p>ERA has been identified as the lead responsible for all those operational objectives which include the carrying out of further studies to improve knowledge on the distribution and population size of the species. Notwithstanding this, ERA will collaborate with relevant entities, as deemed necessary, for the execution of these operational objectives.</p> <p>With regard to the studies required for this particular bat species, kindly note that ERA has commissioned a study on the distribution and population size of bat species within the Maltese Islands. Għar Dalam is one of the sites which was included as part of this study.</p>

Table 13: Species listed in Annex II of Directive 92/43/EEC present on site

Species Code	Species Name	Size: individuals		Data Quality	Site assessment				Pressures relevant to the Natura 2000 site
		Min	Max		Population	Conservation	Isolation	Global	
1303	<i>Rhinolophus hipposideros</i>	1	3	G	C	A	A	C	PF12 - Residential, commercial and industrial activities and structures generating noise, light, heat or other forms of pollution
4010	<i>Armadillidium ghardalamensis</i>	15	20	G	A	A	A	A	

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Adrian Agius  
05/12/2024

Introductory Remarks

This public consultation is welcomed and much appreciated to keep the Management Plans and Conservation Orders updated and in line with current conditions which might have changed since the documents were originally written. It is hoped that from this public consultation protection of the aforementioned sites is increased and not watered down in favour of public or private interest. At the end of the day these Management Plans and Conservation Orders are in place to protect habitats of national, EU and international importance and not to allow loopholes for further degradation of these sites. The way to do this is to build upon the current Management Plans and Conservation Orders, updating them and not writing new documents or water down existing documents, and specify wherever any amendments have been done. Whilst on the whole the quality of the Management Plans and Conservation Orders is commended, the situation on the ground is rather disappointing and it is questionable how much of the Management Plans and Conservation Orders is being implemented in a number of sites. It is clear that not enough enforcement

The new conservation objectives and measures are building on the first Management Plans and Conservation Orders in order to continue the Government's long-term efforts on Natura 2000 site management and biodiversity conservation. The ongoing revision and update process is based on lessons learnt, and on additional scientific and other knowledge attainment. The progress made in implementing the measures listed in Malta's first set of management plans and conservation orders, their effectiveness, and the limitations encountered during their implementation, are also being taken into account. Experience and guidance have been the basis for the development of a more straight-forward structure for the presentation of conservation objectives and measures, which is ultimately based on various processes that have been considered throughout the years.

Since its inception, ERA has made significant progress in allocating both human and financial resources towards the efficient management and administration of Natura 2000 sites. This not only constituted of an enhanced Environment &

	<p>is being done on most sites and that some sites are mismanaged or appear to not be managed at all. It also appears that expertise in some areas such as Light Pollution are absent or very lacking from the authority and its enforcement team being unable to confirm some specifications included in the Management Plans and Conservation Orders themselves. The authority needs to provide training to its enforcement staff or else bring outside consultants to fill in such roles in which the authority is lacking. This document contains recommendations on the specific sites in this public consultation.</p>	<p>Resources Unit, but also the establishment of a Regulatory Affairs Directorate – these further demonstrate the commitment to better policy processes and their implementation, as well as enforcing compliance of activities and measures within Natura 2000 sites. Moreover, the Compliance and Enforcement Unit liaises with site managers for effective enforcement on the ground as part of the site’s management. This is also backed by the involvement of other entities, such as Ambjent Malta.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p> <p>Meanwhile, ERA ensures continuous collaboration with relevant Ministries and entities, as well as non-governmental organisations (NGOs) to ensure the timely and coherent execution of relevant measures. A number of management agreements are already in place with NGOs for the majority of the sites included in this public consultation, which NGOs have been throughout the years effectively managing the sites in question.</p> <p>In addition, ERA has made significant investments through the commissioning of various scientific studies to address various knowledge gaps and attain relevant data and recommendations regarding the habitats and species, both within Natura 2000 sites and beyond. ERA is also constantly encouraging and supporting various projects and research initiatives, as well as conducting consultations with relevant national and international experts to enable the collection of additional data and improved knowledge. These initiatives led to the collation of invaluable new information, which is also informing this conservation objectives/measures revision process.</p>
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	<p><b>MT0000002 - L-Inħawi ta' Pembroke</b></p> <p>It is deeply concerning that as of writing, this site is being faced with two megadevelopments in its vicinity that will likely have a negative impact on the integrity of this site. The site is also threatened with the presence of invasive species such as <i>Acacia saligna</i>, <i>Leucaena leucocephala</i>, <i>Agave americana</i>, <i>Ricinus communis</i>, <i>Pennisetum setaceum</i> and <i>Lantana camara</i>. Although the author is not aware of their presence, the site faces potential incursions of <i>Pittosporum tobira</i>, <i>Washingtonia filifera</i>, <i>Schinus terebinthifolia</i>, <i>Cardiospermum halicacabum</i>, <i>Mirabilis jalapa</i> and exotic succulents like <i>Kalanchoe daigremontiana</i> and <i>Carpobrotus</i> spp. The presence of <i>Pinus halepensis</i> in some parts of the site, though native is also concerning. Saplings and small trees originating from trees that were planted for embellishment close to the Melita Football Club/St Claire's College Secondary school, the species is regenerating at alarming rate and its habit of altering habitats could potentially negatively impact locally important populations of <i>Himantoglossum robertianum</i> and <i>Spiranthes spiralis</i>, which are locally rare and localised. Appropriate management of these aforementioned species is paramount and appropriate removal and monitoring of sites is recommended. It is important to note that the least destructive methods should be used to remove and control the spread of invasive species within the site. <i>Sarcopoterium spinosum</i> population occurring on site needs to be monitored and propagated in situ and ex situ from stock within the site. This propagation should be carried out to the extent that it doesn't inhibit or restrict natural propagation of the species in the site itself. Enforcement needs to make sure that people taking their dogs for walks, keep the dogs on a leash at all times, maintain to the existing paths, keep their dogs away from freshwater rock pools which are sensitive to degradation from trampling both by humans and dogs, and that all dog faeces is collected and disposed of in appropriate bins that are emptied and maintained on a regular basis. Off-roading with motorcycles, bikes and quadbikes also poses a threat to the integrity of the garrigue and freshwater rock pools present on site and need</p>	<p>Nature Trust Malta is responsible for the management of this site through a management agreement. Over the years, the site managers have implemented various conservation measures, including the removal and control of invasive alien species as part of the site's management plan. Additionally, designated pathways and controlled access measures have been implemented to minimise the impact of vehicular and visitor traffic within the site. Further efforts in this regard will ensue.</p> <p>Plans for strengthening the population of <i>Sarcopoterium</i> are already being implemented.</p> <p>ERA assesses the changing patterns of potentially detrimental activities within Natura 2000 sites together with site managers to ensure that the protection afforded to these areas reflect the activities taking place therein. Nature Trust Malta, which is responsible for the management of the Pembroke Natura 2000 site through a Management Agreement conducts regular patrols throughout the site and educate visitors about good practices that need to be adopted to encourage responsible behaviour.</p> <p>The aim of the identified conservation objectives and measures are to protect the habitats and species for which the sites have been designated as Natura 2000 sites. Light pollution was identified as a possible pressure mainly for faunal species (e.g. birds, bats). Therefore, objectives and measures to mitigate the negative effect of light pollution will be included where such species are present.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
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	<p>to be managed appropriately. Street lamps should point away from the site, pointed downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. All lights should be dimmed by 50% after 11pm. New lights along paths and country roads where they are not present are not to be allowed within the boundaries of the site and any light fixtures permitted by the authority shall not be connected to the electrical grid. Globes, uplighters, and floodlights should not be allowed within the Natura 2000 site.</p>	<p>Regarding development, the Habitats Directive does not prohibit development in Natura 2000 sites. When a development proposal or activity falls within or affects a Natura 2000 site, a screening of the appropriate assessment is conducted in accordance with the Directive. This process determines whether the proposal will have an impact on the site. If insufficient information is available, ERA requests further studies, focussing on aspects such as light and noise impacts on species, to enable us to reach a well –informed conclusion.</p>
	<p><b>MT0000004 - II-Maqluba</b></p> <p>This site in particular appears to not be managed and is unfortunately encroached by some commercial developments. It is deeply concerning that in at least two separate occasions in 2010 and 2018, fireworks nearby led to damaging fires being started within the confines of the Natura 2000 site. It is clear that action on this matter needs to be taken to prevent such fires from ever happening again. One of the main concerns on the site is the presence of invasive species. <i>Arundo donax</i> is present extensively at the bottom of the doline and is a fire hazard as well that could lead to fires that burn Annex I Habitats (Directive 92/43/EEC) and Annex IV (Directive 92/43/EEC) stands of <i>Laurus nobilis</i>. Invasive plants such as <i>Opuntia ficus-indica</i> on the rocky slopes and cliffs that border the doline are also concerning. Site is susceptible to incursions from invasive plant species that are carried by water such as <i>Ricinus communis</i> or dispersed by birds such as <i>Pittosporum tobira</i> and <i>Schinus terebinthifolia</i>. <i>Mirabilis jalapa</i>, <i>Cardiospermum halicacabum</i> and <i>Lantana</i> sp. appear to be present on site or near the site and removal or control of their spread needs to be carried out. Monitoring needs to be conducted to prevent incursion of <i>Pennisetum setaceum</i> and appropriate removal of any specimens that might appear within 200m from the Natura</p>	<p>This site is being managed by Ambjent Malta, in liaison with ERA.</p> <p>A measure has been included to address the risk of fires within this site, as follows: <i>'Improve preparedness in case of fire through Fire-Smart Governance systems and introduce a fire management strategy to prevent fire spread'</i>.</p> <p>While ERA acknowledges the issues raised for the site in question, it is important to note the challenges that the site faces including limited accessibility, health and safety challenges and the feasibility in the implementation of measures. Amongst other measures, the removal of <i>Arundo donax</i> from the doline is being scientifically evaluated to determine implications on the existing flora and fauna within the doline.</p> <p>Initiatives are being taken to ensure that invasive alien species, such as <i>Pennisetum setaceum</i>, do not invade Natura 2000 sites. Regarding the presence of a chicken in the doline, matter was addressed with relevant entities and is considered to be a one-off occurrence. Regarding other potential pressures impacting the site, it should be noted that the focus is on pressures identified</p>

	<p>2000 site. Of concern is the presence of chicken being documented in a vlog in 2021 (Gatt, 2021) that found chicken present at the bottom of the doline. The presence of such animals is concerning as they have a negative impact on reptile and invertebrate populations. A number of Annex IV (Directive 92/43/EEC) invertebrate species are present in this site that could potentially be impacted by the presence of domestic fowl in the site. Failure of the authority to not only address this but to not even be aware of their presence shows that the authority has failed to adequately monitor the site and is a failure on the authority's side and the site manager of the site. Presence of free roaming cats is also concerning and if found in the area of doline should be removed from the site. Competition between feral pigeons and other cliff nesting birds such as Blue Rock Thrush needs to be assessed and if found to negatively such birds, appropriate mitigation efforts should be carried out. Litter should be picked up from the path leading to the doline on at least a weekly basis by the site manager. Street lamps should point away from the site, pointed downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights in the main road and any lights lighting the chapel should be dimmed by 50% after 11pm and lights in any of the side streets country/country roads bordering the site are to be switched off by 11pm. New lights along paths and country roads bordering the site where they are not present are not to be allowed. Globes, uplighters, and floodlights should not be allowed within the Natura 2000 site or within 50m of the boundary of the Natura 2000 site.</p>	<p>as medium or high significance. However, if additional pressures are recognised, their mitigation will also be taken into account.</p> <p>Meanwhile, it is to be kept in mind that the draft policy document consists of site-specific conservation objectives and measures focussing primarily on the conservation of the habitats and species for which the site was designated.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
	<p><b>MT0000006 - Is-Simar (limiti ta' San Pawl il-Baħar)</b></p> <p>Main concerns on the situation of this site are the encroachment of development, run off of pesticides and fertilizers from surrounding fields, and invasive species. Of concern is the presence of a cat colony right outside the boundaries of the nature reserve. This cat colony is of concern since Simar is an IBA and nature reserve where a number of locally rare bird species breed. The cat colony needs to be removed immediately and monitoring needs to be</p>	<p>The policy document addresses pressures arising from invasive alien species and the presence of feral cats. To mitigate these impacts, measures have been included related to the neutering/relocation of cats and the removal and control of invasive alien species within the site.</p>

	<p>set in place to avoid re-establishment of cat colony. Cat feeding needs to be prohibited within 50m of the boundary of the nature reserve. It is up to the site manager that access to the nature reserve is restricted to cats and any known entry points for cats are to be sealed off in a way that cats cannot enter the nature reserve. Cats found within the confines of the nature reserve are to be removed. Monitoring of water quality on the site needs to be undertaken on a regular basis by the site manager. Development outside the current development footprint is to be prohibited within the boundaries of the Natura 2000 site. The apiaries which are known to be suitable roosting habitat for <i>Rhinolophus hipposideros</i> should have access to them restricted and ideally have a bat grille set up to prevent unauthorised access within them. A horizontal bat grille should be installed at the entrance with horizontal bars spaced 13cm apart to allow access not only for <i>Rhinolophus hipposideros</i> but also larger bat species such as <i>Myotis punicus</i> and <i>Tadarida teniotis</i>, and installed in such a way that prevents any unauthorised access. Kindly see latest edition of Bat Workers' Manual for instructions on how suitable bat grilles are to be installed (Mitchell-Jones &amp; McLeish, 2004). <i>Pennisetum setaceum</i> needs to be removed within the boundaries of the Natura 2000 site. Street lamps should point away from the site, point downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights in the main road should be dimmed by 50% after 11pm and street lights in any country roads should be switched off after 11pm. New lights along paths and roads within the site where they are not present are not to be allowed. Globes, uplighters, and floodlights should not be allowed within the Natura 2000 site. Any new development within the boundaries of the site shall not be connected to the electrical grid.</p>	<p>Water quality monitoring is already conducted regularly by the site managers, fulfilling the requirements of the EU Water Framework Directive (WFD), as the Simar wetland area is designated as a WFD waterbody.</p> <p>To further enhance our understanding of bat populations within the Maltese Islands, ERA has commissioned a study to investigate their distribution and population size. An operational objective has been included in the policy document to refer to this study. Once final data is obtained from the study, specific measures on bat species will be implemented based on the study's recommendations.</p> <p>Regarding development, the Habitats Directive does not prohibit development in Natura 2000 sites. When a development proposal or activity falls within or affects a Natura 2000 site, a screening of the appropriate assessment is conducted in accordance with the Directive. This process determines whether the proposal will have an impact on the site. If insufficient information is available, ERA requests further studies, focussing on aspects such as light and noise impacts on species, to enable us to reach a well –informed conclusion.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p> <p>Notwithstanding this, the mitigation of light pollution has been included to ensure that any works, activities or any new developments proposed within and in the vicinity of the site are assessed with respect to potential light pollution, and any preventive/mitigation measures to reduce disturbance to birds are adopted accordingly.</p>
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	<p><b>MT0000007 - Is-Salini</b></p> <p>Main concerns on the situation of this site are run off of pesticides and fertilizers from surrounding fields. Monitoring of water quality is required to be performed on a regular basis by the site manager. Invasive species within the Natura 2000 site are also of concern. <i>Pennisetum setaceum</i>, <i>Leucaena leucocephala</i>, <i>Pittosporum tobira</i>, <i>Acacia saligna</i> and any other invasive species that can propagate on their own need to be removed within the Natura 2000 site and monitoring needs to be set up to prevent their reappearance or incursion of new invasive species. Street lamps should point away from the site, point downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights in the main road should be dimmed by 50% after 11pm. Light trespass shall not be allowed within the areas of the canal, salt pans or garrigue present within the boundaries of the site.</p>	<p>Water quality monitoring is already conducted regularly by ERA, in line with the requirements of the EU Water Framework Directive (WFD), as the transitional waters within these Natura 2000 sites are designated as a WFD water bodies. Results of such recent monitoring carried out, as well as planned monitoring, are included in Malta's 3rd River Basin Management Plan.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
	<p><b>MT0000008 - L-Ghadira s-Safra u l-Iskoll tal-Għallis</b></p> <p>It is sad to say that this Natura 2000 site in particular had been left in a pitiable state which led to the complete destruction of the temporary pond that once gave the name to the site. Whilst some of the recent work on the site such as restricting access is commendable for such a small site, it is concerning that this site's management has been handed over to a hunting NGO which lacks the expertise on the botany and freshwater ecology of the site for which this Natura 2000 site was originally declared. Conservation measures should be in place for the conservation of <i>Crypsis aculeata</i>, <i>Cressa cretica</i>, <i>Polygonum maritimum</i> and <i>Matthiola tricuspidata</i>. Both in situ and ex situ propagation should be carried of the aforementioned plants where possible. Planting of trees and plants are to be of plants naturally occurring in the site that have been sourced from the site. If a species is to be planted outside the cordoned off area it needs to be either sourced from plants naturally present within the site, if not present within the site from naturally occurring plants in the</p>	<p>It is to be noted that the temporary pond (Code: Habitat 3170) is still present within the site and characteristic flora and fauna species of this habitat have been recorded within. This is a good indication that the habitat is thriving well. The objectives included in the policy document is to maintain the presence of typical species associated with Habitat 3170* within the site and not to introduce such species.</p> <p>While the management is indeed being led by a hunting organisation, the actions are being taken under the guidance of the relevant entities and experts, and very positive results can be observed.</p> <p>With regard to species propagation, a number of plants used for habitat restoration efforts are being grown from local stock. Exceptions may occur, such as in the case when a particular species needs to be re-introduced in a particular habitat from where it has become extinct. In these instances,</p>

	<p>nearest site to the Natura 2000, if not present nearby from a locality in Malta (the island), if not present in Malta from either Gozo or Comino, and finally in the case that it is not present in the Maltese islands sourced from the Hyblaean plateau region of Sicily. It is concerning that for example Tamarisk planted in the Natura 2000 site doesn't appear to be the native <i>Tamarix africana</i> and it's unclear from where the other planted species were sourced from and it's very likely that they were imported from abroad which is not good practice. Management of <i>Limbarda crithmoides</i> should be considered as it is beginning to show invasive tendencies in this site in particular, potentially displacing the more endangered species present on site. Invasive species such as <i>Acacia saligna</i> and <i>Agave americana</i> need to be removed from the site. Site needs to be monitored for incursion of invasive species such as <i>Pennisetum setaceum</i> and if present need to be removed. In the case that the temporary pond is sustained for a period of a week or more, release of <i>Branchipus schaefferi</i> and <i>Triops cancriformis</i> into the pond should not take place. Monitoring should take place to see if they are present however if they are not present, they should not be reintroduced. Use of bird callers and music louder than 70db is to be prohibited within 200m of I-Iskoll tal-Għallis. Street lamps should point away from the site, point downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights in the main road should be dimmed by 50% after 11pm. Globes, uplighters, and floodlights should not be allowed within the Natura 2000 site. Light trespass needs to be eliminated where present in the site.</p>	<p>these are usually sourced from nearby sites or imported when there are no alternatives, mainly from Sicily.</p> <p>Regarding ex-situ conservation efforts, ERA collaborates with other entities, such as Ambjent Malta which cultivates over 80 different indigenous and/or endemic plants in their own nurseries. ERA is also in collaboration with Argotti Botanic Gardens which cultivate plants in their botanical gardens, which will be then utilised to re-enforce species in the Natura 2000 sites. In addition, ERA is also in collaboration with the Plant Protection Directorate which utilises their laboratories for the micro-propagation of certain species.</p> <p>Efforts have been ongoing to control the presence of invasive alien species within the site. The policy document also includes measures for the continued removal and control of invasive alien species.</p> <p>Regarding aspects linked with bird callers, the Authority will refer matter accordingly with the relevant competent authority. Furthermore, the use of pre-recorded bird calls is prohibited as per the Conservation of Wild Birds Regulations (S.L. 549.42).</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
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	<p><b>MT0000009 - L-Inħawi tar-Ramla tat-Torri u tal-Irdum tal-Madonna</b></p> <p>Both Ramla tat-Torri and I-Irdum tal-Madonna are negatively impacted by human activity and invasive species. It is concerning that the sand dune at Ramla tat-Torri is left in a degraded state where invasive species are allowed to proliferate. The following invasive species are to be removed from the sand dune and surroundings <i>Mirabilis jalapa</i>, <i>Leucaena leucocephala</i>, <i>Arundo donax</i> <i>Papyrus</i> sp. and <i>Symphyotrichum squamatum</i>. Monitoring for incursions on the sand dune of <i>Agave</i> sp., <i>Acacia saligna</i>, <i>Carpobrotus edulis</i>, <i>Aptenia</i> spp., <i>Cardiospermum</i> spp. and <i>Pennisetum setaceum</i> needs to be carried out. Removal of <i>Pennisetum setaceum</i> needs to be carried out within the Natura 2000 site and within 500m from the boundary of the Natura 2000 site. The sand dune species should be allowed to regenerate on their own and where necessary in situ and ex situ propagation of the population from the site should be carried out in particular for <i>Euphorbia terracina</i> and <i>Calystegia soldanella</i> if still present. Species planted in the dune area shall be only from specimens sourced from this site. Of serious concern is the presence of a cat colony in the sand dune area. Cats have been documented preying <i>Brachytrupes megacephalus</i> and the immediate removal of this cat colony is necessary to make sure the <i>Brachytrupes megacephalus</i> population in the sand dune area is not decimated and extirpated from the site. Monitoring shall be carried out to make sure no new cat colonies are re-established in the area and cat feeding within the entirety of the Natura 2000 site is to be banned as well as within 200m of the boundary of the Natura 2000 site. Development in the vicinity of up to 500m of the boundary of the sand dunes is to be limited to 1 storey in height and prohibited from being taller than 2 storeys in height. Development outside the existing development footprint must not be permitted.</p> <p>Light pollution, noise pollution and rats are negatively impacting the breeding colony of <i>Puffinus yelkouan</i> at Irdum tal-Madonna. The main source of these issues is the camping sites in the vicinity of the cliffs. It is important that</p>	<p>Significant progress has been made throughout the years to remove and control the spread of invasive alien species within this Natura 2000 site.</p> <p>Regarding ex-situ conservation efforts, ERA is in collaboration with Argotti Botanic Gardens to cultivate sand dune species. Such species will be then utilised to reinforce existing populations within the sand dune habitats.</p> <p>A measure has been included in the policy document for the neutering/relocation of feral cats present within the sand dune area.</p> <p>Pressures such as light pollution, noise pollution and rat infestations have been also addressed in the site-specific conservation objectives and measures. It is to be duly noted that rodent control has been ongoing for a number of years for the site in question and with success. Measures for improved management of camping activities, including waste management are also covered.</p> <p>Regarding waste management, a measure has been included to improve waste management within the camping site area. Currently, the Mellieħa Local Council provides a door-to-door collection service within the locality. It is to be noted that past experiences have shown that on-site skips are not the most effective solution. The approach that is being encouraged follows the ‘take the waste home’ principle, which aims to further promote personal responsibility.</p> <p>Development applications go through existing processes, which includes assessments as required by law. In the case of a Natura 2000 sites, part of the process entails screening for an Appropriate Assessment according to the EU Habitats Directive (in Maltese law S.L. 549.44: Flora, Fauna and Natural Habitats Protection Regulations), which process is coordinated by ERA. Once the conservation objectives for each site are adopted, they will be used in this process. The specific conservation objectives for the sites and the related targets are designed based on the ecological attributes that are most relevant to defining the conservation status of natural habitats and species.</p>
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	<p>organic waste is collected on a daily basis from the site and that appropriate bins that rats can't access such as bins that require a manual mechanism to open them are installed in the camping sites and picnic areas as well as in the vicinity of the camping site and picnic areas. These bins need to be maintained on a regular basis and replaced if damaged and cleaned at least once a day or as soon as they are full. Appropriate biocontrol and eradication of rats needs to be carried out within the Natura 2000 site as well as up to 500m from the boundary of the Natura 2000 site. Loud music above 70db is to be prohibited within 200m of the seabird colony and within 500m of the seabird colony no music above 90db is to be allowed. It is recommended that environmental wardens are present on a 24/7 basis in this Natura 2000 site in particular. Street lamps should point away from the cliffs and sand dune area, point downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights in the main road and any lights lighting the chapel should be switched off after 11pm. New lights along paths and roads within and bordering the site where they are not present are not to be allowed. Globes, uplighters, and floodlights should not be allowed within the Natura 2000 site. Light trespass needs to be eliminated where present on the cliffs and sand dune area. Any new development within the boundaries of the site shall not be connected to the electrical grid.</p>	<p>Furthermore, Regulation 18 of the Flora, Fauna and Natural Protection Regulations (S.L. 549.44) restricts operation and activities within SACs and SPAs without a prior consent from ERA. ERA may refuse the proposal or issue its consent imposing conditions or other provisions deemed fit and appropriate to impose. In addition to Regulation 18 of S.L. 549.44, the Environmental Permitting Regulations (Procedure for Applications and their Determination) Regulations (S.L. 549.172) have been published to streamline, and for some sectors, replace existing permitting regimes covering a multitude of operations, interventions or activities. In addition, the regulatory scope will be extended to other areas that are currently unregulated.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
	<p><b>MT000011 - Ghar Dalam</b></p> <p>It is commendable that light pollution is addressed appropriately within the Conservation Order of this site within the premises of Ghar Dalam and surrounding gardens however no mention is given to mitigating light pollution originating from within the Ghar Dalam valley. Globes, uplighters, and floodlights should not be allowed within 200m of the line of sight of the cave entrance. Any lighting fixtures present within 200m of the line of sight of the cave entrance need to point away from the site, point downwards, be full cutoff to avoid light trespass, be of low intensity and of a colour temperature</p>	<p>Comment has been duly noted. The mitigation of light pollution has been included in the site-specific conservation objectives and measures policy document to ensure that any works, activities or any new developments proposed within and in the vicinity of the site are assessed with respect to potential light pollution, and any preventive/mitigation measures to reduce disturbance to bats are adopted accordingly.</p>

	<p>below 3000 K. It should also be encouraged that the grille at the entrance of the cave is replaced with a more bat friendly grille following specifications mentioned in the Bat Workers' Manual (Mitchell-Jones &amp; McLeish, 2004) if not completely at the very least the gate. A horizontal bat grille should be installed at the entrance with horizontal bars spaced 13cm apart to allow access not only for <i>Rhinolophus hipposideros</i> but also larger bat species such as <i>Myotis punicus</i> and <i>Tadarida teniotis</i>, and installed in such a way that prevents any unauthorised access.</p> <p>Street lamps should point away from the site, point downwards, be full cut-off to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights in the main road should be dimmed by 50% after 11pm.</p>	<p>Additionally, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
	<p><b>MT0000013 - Iċ-Ċittadella</b></p> <p>Conservation of bats and endangered plant species are of the utmost priority for this site. All entrances to known roost sites and potential roost sites should be accessible to bats by either leaving the entrance unobstructed in the case where the roost is not accessible to people or closed off with an appropriate bat friendly grill as specified by the Bat Workers' Manual (Mitchell-Jones &amp; McLeish, 2004) if it is easily accessible. Where easily accessible, a horizontal bat grille should be installed at the entrance of the known roost or potential roosting site with horizontal bars spaced 13cm apart to allow access not only for <i>Rhinolophus hipposideros</i> but also larger bat species such as <i>Myotis punicus</i> and <i>Tadarida teniotis</i>, and installed in such a way that prevents any unauthorised access. Lighting in the line of sight of the entrance to the roost needs to be removed. Monitoring should take place to ensure that <i>Linaria pseudolaxiflora</i> and <i>Chamomilla aurea</i> are still present. Globes and uplighters should not be allowed within the Natura 2000 site and floodlights need to be positioned in a way that there is no light trespass into the entrances of roosts</p>	<p>Comment has been duly noted. It is to be noted that ERA has commissioned a study to investigate the distribution and population size of bat species. An operational objective has been included in the policy document to refer to this study. Once data is obtained from the study, specific measures on bat species will be implemented based on the study's recommendations for the site in question.</p> <p>ERA also undergoes routine monitoring of the mentioned plant species to ensure that data on the distribution and population size of the species is updated from time-to-time. This is also essential for fulfilling Malta's EU reporting obligations.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>

		<p>or pointing upwards. All lights within Ċittadella should be dimmed by 50% after 11pm.</p>	
		<p><b>MT0000014 - II-Ballut ta' Marsaxlokk</b></p> <p>It is deeply concerning that this site is facing an existential threat due to the accelerated erosion of the coastal boundary. Urgent action needs to be carried out to stop or at the very least slow down the erosion by any means possible and to conduct sand replenishment of the sand lost due erosion. Site also faces existential threats due to sea level rise since it is close to the sea and almost at sea level. Propagation of endangered plants such as <i>Carex extensa</i> and <i>Atriplex portulacoides</i> should be carried out both in situ and ex situ. Planting of any species of flora present in the site should be done only with specimens sourced from the site. Of concern is the possible encroachment of <i>Pennisetum setaceum</i> on the site. A large number of <i>Pennisetum setaceum</i> appear to have colonised a derelict area in what is assumed to be a private property bordering the site right next to the Hunters Tower. If the site is private, permission needs to be obtained from the landowner for the removal of this plant. <i>Pennisetum setaceum</i> should be removed where present from at least 200m from the boundary of site. Stray cat colonies are to be dismantled and removed from 200m from the boundary of the site. Street lamps should point away from the site, point downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights in the main road and any lights lighting the chapel should be dimmed by 50% after 11pm. Globes, uplighters, and floodlights should not be allowed within the Natura 2000 site or within 50m of the boundary of the Natura 2000 site.</p>	<p>It is to be noted that coastal erosion at Ballut tal-Marsaxlokk is being addressed through an action (Action C.13 – Restoration of one of the coastal wetlands) within the EU LIFE-IP RBMP Malta Project (LIFE 16 IPE MT 008). This project includes the assessment and restoration of the hydro-morphological elements pertaining to the coastal wetland, the study of current hydrological regimes and associated coastal erosion processes, thereby enabling the identification of the possible interventions and alternative solutions targeting the restoration of coastal wetlands. Studies have been conducted as part of the project to assess the situation, identify the interventions required and provide recommendations. ERA is in collaboration with Infrastructure Malta to implement mitigation measures to halt and reverse the coastal erosion process and related impacts. Respective measures are included in the policy document. This action should hence result in an improvement of the status of habitats and species dependent on the wetland ecosystem, and an increase in the resilience of the coastal wetland in question.</p> <p>Species propagation is continuously carried out, both by Nature Trust and ERA, including through relevant arrangements with other entities, making use of specimens also sourced from the site as relevant.</p> <p>Furthermore, initiatives are being taken to ensure that invasive alien species, such as <i>Pennisetum setaceum</i>, do not invade Natura 2000 sites. Regarding other potential pressures impacting the site (such as stray cats), it should be noted that the focus is on pressures currently identified as medium or high significance. However, if additional pressures are recognised to eventually become of similar significance, their mitigation will be also taken into account.</p>

			<p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
		<p><b>MT0000015 - L-Inħawi ta' I-Għadira</b></p> <p>Main concerns on the situation of this site are the encroachment of development, run off of pesticides and fertilizers from surrounding fields, and invasive species. Monitoring of water quality on the site needs to be undertaken on a regular basis by the site manager. Removal of invasive species such as <i>Acacia saligna</i> and <i>Pittosporum tobira</i> is to be given priority. <i>Pennisetum setaceum</i> needs to be removed within the boundaries of the Natura 2000 site. Street lamps should point away from the site, point downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights in the main road should be dimmed by 50% after 11pm and street lights in any country roads should be switched off after 11pm. New lights along paths and roads within the site where they are not present are not to be allowed. Globes, uplighters, and floodlights should not be allowed within the Natura 2000 site. Any new development within the boundaries of the site shall not be connected to the electrical grid (excluding development of national importance).</p>	<p>Water quality monitoring is already conducted regularly by the site managers, fulfilling the requirements of the EU Water Framework Directive (WFD), as the wetland area is designated as a WFD waterbody.</p> <p>The removal and control of invasive alien species is also carried out by the site managers. A measure has also been included in the policy document to address this. Measures related to light pollution emanating from works/activities or new developments have also been included in the document.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
		<p><b>MT0000016 - Filfla u I-Gzejjer ta' Madwarha</b></p> <p>Despite being a strict nature reserve where landing on the island is strictly prohibited unless with a permit for scientific research there are still some concerns regarding the protection of this site. One of the major concerns is the accidental or deliberate release of any kind of invasive species with the most worrisome being the accidental introduction of rats. To avoid accidental</p>	<p>A measure regarding the implementation of biosecurity measures has been included in the site-specific conservation objectives and measures to ensure that the islets are kept free from rodents.</p> <p>With regard to access to the site and surrounding marine area, legal provisions are in place through Cap. 323, G.N. 173 of 1990 and Notice to Mariners No 44 of 2020 and ERA's relevant permitting procedures.</p>

	<p>introduction of rats, passage of boats or berthing closer than 1 km to the islands should not be allowed, passage of boats or berthing closer than 500m is to be prohibited and passage of boats or berthing closer than 50m is to be strictly prohibited with heavy fines being applicable to anyone caught breaching this distance to the islet (Thomas &amp; Varnham). Traffic within 2 km of the islet is to be regulated and limited as much as possible and traffic within the Malta-Filfla channel is to be restricted as much as possible. In the case of approved landing parties that have a permit to land on the islet, the vehicle that carried them to the site be it boat or helicopter should be inspected to make sure no rats are onboard and appropriate biocontrol measures are to be set up on the vehicle and accounted for. Landing vehicles should leave the islet within 10 minutes of landing and in the case of boats should be at least 500m away from the islet within 30 minutes and 1km away from the islet within 1 hour. Biosecurity measures and monitoring for rat incursions need to be accounted for on the islet as long as these measures don't negatively impact species naturally present on the islet. Boats within 1 nautical mile of the islet should not shine light in the direction of the islet or play loud music. Fishing from surface vessels within 1 nautical mile off the islet should be discouraged as much as possible and ideally should be prohibited or at the very least require a permit to do so. Action should be taken to reduce light pollution from the Maltese coastline that is in the direct line of sight of Filfla.</p> <p>NB: Where reference is made in km and Conservation Order mentions Nautical Miles the distance in km is taken to be in Nautical Miles if the distance mentioned in the Conservation Order is greater</p>	<p>With regard to light pollution, a measure has been included as follows in the policy document: <i>Identification of permanent sources of light pollution from coastal zone developments from the mainland and implementation of preventive/ mitigation measures to reduce risk of light-induced strandings.</i></p> <p>Meanwhile, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
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	<p><b>MT0000022 - Il-Gżejjer ta' San Pawl (Selmunett)</b></p> <p>Major concern for the site is the presence of loud boat parties taking place in the vicinity of the islets and footfall on the islets. Boats should not play loud music louder than 90db and shine light in the direction of the islets if they are within 500m from the islets and are not to berth closer than 200m from the islets and should not shine light in the direction of the islets. Landing on the islet should be prohibited and the islets should be considered as strict nature reserves similar to Filfla. Control of invasive species such as rats needs to be carried out and where possible complete eradication should be carried out. Invasive plants such as <i>Opuntia ficus-indica</i> need to be removed from the site. Lighting of any landmarks such as the statue on the islets should be removed or at least switched off by 11pm.</p>	<p>Notice to Mariners No. 44 of 2020 has been issued, which includes light and sound restrictions for the coastal marine area of Selmunett/Il-Gżejjer ta' San Pawl.</p> <p>Path access to Selmunett has been designated since 1993 as per S.L. 549.03. ERA's intention has never been to restrict public access to Selmunett. It is evident that more information is needed to inform the public about accessible and restricted areas on Selmunett. A series of talks have already been held and discussions are currently taking place to further enforce current laws.</p> <p>With regard to control of invasive alien species, measures have been included to address both rodent control and plant IAS within the site.</p>
	<p><b>MT0000023 - Il-Magħluq tal-Baħar ta' Marsaskala</b></p> <p>Major concerns for the site are lack of water circulation, runoff from surrounding fields and roads, and littering. Currently temporary measures are being used to increase dissolved oxygen in the pond by using artificial pumps. More permanent solutions need to be found such as by conducting interventions in the road to increase water circulation ideally raising the road so that seawater can flow freely into the site. Water quality should be monitored on a regular basis and all year round, and where possible restrict fertiliser and pesticide use in the surrounding fields. Litter should be picked up from the site, by site manager on a weekly basis and appropriate no littering signage should be installed around the perimeter of the site. Feral ducks are to be removed from the site. Stray cats entering the site are to be removed as well. Street lamps should point away from the site, point downwards, be full cutoff to avoid light trespass on the site, be of low intensity and of a colour temperature below 3000 K. Street lights should be dimmed by 50% after 11pm. Globes, uplighters, and floodlights should not be</p>	<p>Measures to maintain and improve water circulation and water quality have been included, and this through the cleaning and maintenance of interconnected channels at the land-sea interface, and to prevent litter carried by storm water runoff from reaching the lagoon through the installation of physical barriers/collection systems. Monitoring of water quality is also carried out routinely.</p> <p>Efforts for the control of domestic waterfowl populations within the site have been ongoing – a measure has been included to ensure its continuation. Regarding other potential pressures impacting the site (such as stray cats), it should be noted that the focus is on pressures currently identified as medium or high significance. However, if additional pressures are recognised to eventually become of similar significance, their mitigation will be also taken into account.</p> <p>It is to be noted that Nature Trust Malta is responsible for the management of this site through a management agreement. Apart from ensuring the</p>

		<p>allowed within the Natura 2000 site or within 50m of the boundary of the Natura 2000 site.</p>	<p>implementation of the site’s conservation measures, the site manager is also responsible to carry out monitoring and maintenance of the site.</p> <p>Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
		<p><b>Concluding Remarks</b></p> <p>It is welcomed that such consultation has been opened to the public and it is recommended that such consultations occur every 5 to 10 years to engage public consensus on the effectivity of the Management Plans and Conservation Orders. Whilst it is commendable that the Management Plans and Conservation Orders are of high quality and very technical in nature, the reality none the less remains that for the majority of the sites, very few measures are implemented with a number of sites being completely neglected and becoming overrun with invasive species and damaging human activity being allowed without any mitigations in place. It is sad to say that the prospects for many of the sites and species found in them don’t look too good, with a number of sites and species facing uncertain futures and existential threats in the near future. It is hoped that following this consultation urgent action is taken to save some of the most threatened sites and species. The authority needs to make sure it also has adequate staff to monitor certain impacts such as light pollution and where necessary bring consultants to assist with the authority’s duties.</p> <p><b>References</b></p> <p>Mitchell-Jones, T., &amp; McLeish, A., 2004, <i>Bat Workers’ Manual</i>.  <a href="https://hub.jncc.gov.uk/assets/e5888ae1-3306-4f17-9441-51a5f4dc416a">https://hub.jncc.gov.uk/assets/e5888ae1-3306-4f17-9441-51a5f4dc416a</a></p>	<p>Revision and updating of the site-specific conservation objectives and measures need to be carried out after a number of years to track progress, monitor effectiveness and identify any further measures that need to be implemented to ensure that the conservation status of the habitats and species for which each Natura 2000 has been designated is maintained or improved.</p> <p>ERA continually works directly and with relevant entities, including Ambient Malta and NGOs, amongst others, to move forward with the implementation of measures, which often come along with their fair of challenges. Working structures are in place to assess implementation and effectiveness, which was the basis for the development of the revised measures for which consultation was carried out. ERA has also worked on extensive internal capacity building, and works with experts/consultants as necessary.</p> <p>As mentioned above, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>

		<p>Thomas, S., &amp; Varnham, K., <i>Island biosecurity manual</i>, <a href="https://biosecurityforlife.org.uk/admin/resources/island-biosecurity-manual-2.pdf">https://biosecurityforlife.org.uk/admin/resources/island-biosecurity-manual-2.pdf</a></p> <p>Gatt, C. N., <i>EXPLORING the Big HOLE . Il-Maqluba Qrendi, Malta - Up Close and Personal.</i> CNG <i>Trekventures</i>, 04/2021  <a href="https://www.youtube.com/watch?v=FJ3pBTIIdAs&amp;t=638s">https://www.youtube.com/watch?v=FJ3pBTIIdAs&amp;t=638s</a></p>	
8	<p>The Light Pollution Awareness Group</p> <p>The Astronomical Society of Malta</p> <p>05/12/2024</p>	<p>Regarding the Public Consultation on the Proposed Conservation Objectives and Measures for Malta’s Terrestrial Natura 2000 Sites, launched by ERA, the Light Pollution Awareness Group, a sub-group of The Astronomical Society of Malta (VO/0239), has reviewed the current Management Plans and/or Conservation Orders concerning light pollution for the 13 terrestrial Natura 2000 sites included in this consultation. In this document, we assess the current light pollution mitigation measures and present a number of recommendations to improve the existing Management Plans and/or Conservation Orders for these sites, with a specific emphasis on reducing light pollution.</p> <p>The document has also been approved and endorsed by the following Non-Governmental Organisations (NGOs):</p> <ul style="list-style-type: none"> <li>• BirdLife Malta (VO/0052)</li> <li>• Malta Ranger Unit (VO/2443)</li> <li>• Moviment Graffiti (VO/0126)</li> <li>• Foundation for the Conservation of the Maltese Honey Bee (VO/2403)</li> </ul>	Comment has been duly noted.
		<p>As outlined by ERA, the 13 terrestrial Natura 2000 sites under review in this consultation are:</p> <ol style="list-style-type: none"> <li>1. MT0000002 - L-Inħawi ta’ Pembroke</li> <li>2. MT0000004 - Il-Maqluba (limiti tal-Qrendi)</li> <li>3. MT0000006 - Is-Simar (limiti ta' San Pawl il-Baħar)</li> <li>4. MT0000007- Is-Salini</li> <li>5. MT0000008 - L-Ghadira s-Safra u l-Iskoll tal-Ghallis</li> <li>6. MT0000009 - L-Inħawi tar-Ramla tat-Torri u tal-Irdum tal-Madonna</li> </ol>	Comment has been duly noted.

		<p>7. MT0000011 - Għar Dalam  8. MT0000013 - Iċ-Ċittadella  9. MT0000014 - Il-Ballut ta' Marsaxlokk  10. MT0000015 - L-Inħawi tal-Għadira  11. MT0000016 - Filfla u l-Gzejjer ta' Madwarha  12. MT0000022 - Il-Gzejjer ta' San Pawl (Selmunett)  13. MT0000023 - Il-Magħluq tal-Baħar ta' Marsaskala</p> <p>This section examines the current Management Plans and Conservation Orders, focusing on the extent to which light pollution is acknowledged and addressed within these documents. Furthermore, we recommend site-specific actions, together with broader recommendations as explained in <b>Annex 1 on page 21</b>, detailing essential measures that should be incorporated into the existing Management Plans and Conservation Orders.</p>	
		<p><b>MT0000002: L-INĦAWI TA' PEMBROKE</b></p> <p>Light pollution is mentioned throughout the Natura 2000 Management Plan, as follows:</p> <ul style="list-style-type: none"> <li>• On page 4: “A number of activities exert pressure on the ecology of the site. The site is surrounded by urban development, which contributes to light pollution at the SAC. To the west of the site lies the abandoned White Rocks Complex.”</li> <li>• On pages 26 and 92: The Action Plan has come up with sixteen actions that have been grouped under five objectives. The Action Plan indicated that it will be integrated as relevant within the Natura 2000 Management Plan. The sixteen actions/five objectives include the following: <ul style="list-style-type: none"> <li>A. Maintenance of species and habitat favourable conservation status <ul style="list-style-type: none"> <li>1. the restoration of path for cycling, jogging and walking trails/footpaths</li> </ul> </li> </ul> </li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document, which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>Site-specific conservation objectives and measures have been focused on those habitats and species for which the site has been designated and to mitigate the pressures that are known to negatively impact the habitats and species within the Natura 2000 site in question. In this case, light pollution is not a direct pressure impacting any habitats and species for which the Natura 2000 site has been designated. Notwithstanding this, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various</p>

		<p>2. the installation of adequate lighting systems to minimize light pollution and biotic disturbance</p> <p>3. the inclusion of raised footpaths to allow fauna to pass without hindrance</p> <p>4. the deployment of hurdles to prevent off-roading</p> <p>5. visitor flow management</p> <ul style="list-style-type: none"> <li>• On page 94: The installation of adequate lighting systems to minimize light pollution and biotic disturbance has been partially implemented as Nature Trust wishes the area to remain in the dark. Although the Madliena Tower was restored it will not be used as a visitor interpretation centre as this is far too small inside. Nature Trust and MTA are discussing the possibility to have a room at the gardens just at start of the trail and restoring a shelter room of the British Forces to act as a classroom for students.</li> <li>• On page 95: Light pollution has also been identified by the Pembroke Heritage Project as a factor negatively impacting the site. Sources of this light are the various infrastructure surrounding the natural habitats.</li> <li>• On page 96, as listed in table 12: Light pollution is identified as a factor having an effect/impact on the disturbances and displacement of wildlife, and having a medium intensity and localised extent.</li> </ul> <p><b>Further action:</b></p> <ul style="list-style-type: none"> <li>• Although light pollution is extensively discussed in this document, the installation of appropriate lighting systems must be further explored to ensure they align with the light in Annex 1.</li> </ul>	<p>sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
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	<ul style="list-style-type: none"> <li>• Additionally, light pollution mitigation should be considered when planning the restoration of structures within the site.</li> <li>• Light pollution mitigation measures should be incorporated into urban development plans in the vicinity of the site.</li> <li>• Light pollution emanating from the Reverse Osmosis Plant, which lies within the Natura 2000 site itself, must also be tackled. As further explored in <b>Annex 1</b>, lights should be downward-facing and full cut-off, with no light trespass beyond the Plant boundary.</li> <li>• No new streetlights or lighting of paths shall be added where not already present as further explored in <b>Annex 1</b>.</li> </ul>	
	<p><b>MT0000004: IL-MAQLUBA (LIMITI TAL-QRENDI)</b></p> <p>Light pollution is mentioned in the Conservation Order G.N. 1372 of 2016, with regards to this site, as follows:</p> <p>“D. Regulation of Activities</p> <p>6. Any external lights (including street lighting) within the SAC shall be directed away from the doline, be directed downwards and be of the full cut-off type to limit light pollution.”</p> <p><b>Further action:</b></p> <ul style="list-style-type: none"> <li>• Light pollution from the Maqluba Chapel and other developments in the area should be accounted for, ensuring that light fixtures are in line with ERA guidelines for mitigation of light pollution, and as outlined in <b>Annex 1</b>.</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document, which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>Site-specific conservation objectives and measures have been focused on those habitats and species for which the site has been designated and to mitigate the pressures that are known to negatively impact the habitats and species within the Natura 2000 site in question. In this case, light pollution is not a direct pressure impacting any habitats and species for which the Natura 2000 site has been designated. Notwithstanding this, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the</p>

			<p>general public against which existing and future lighting sources would need to abide by.</p>
		<p><b>MT0000006: IS-SIMAR (LIMITI TA' SAN PAWL IL-BAĦAR)</b></p> <p>Although a Natura 2000 Management Plan is available for this site, there is no mention of light pollution.</p> <p><b>Further action:</b></p> <ul style="list-style-type: none"> <li>As the site encompasses the Simar Nature Reserve, a fully protected bird sanctuary, it is imperative that light pollution is comprehensively addressed.</li> <li>Particular attention must be given to the light pollution emanating from the Xemxija area, including the lighting along the Xemxija promenade, which lacks full cut-off features due to the fixtures having a central reflective element. Addressing these issues is critical to mitigating the impact of light pollution on this ecologically significant area.</li> <li>Please refer to <b>Annex 1</b>.</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document, which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>The mitigation of light pollution has been included in the site-specific conservation objectives and measures policy document to ensure that any works, activities or any new developments proposed within and in the vicinity of the site are assessed with respect to potential light pollution, and any preventive/mitigation measures to reduce disturbance to birds are adopted accordingly.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
		<p><b>MT0000007: IS-SALINI</b></p> <p>The following points pertaining to light pollution are listed in the Natura 2000 Management Plan, on page 101, with reference to Saltmarsh habitats (1410, 1420, 92D0):</p> <ul style="list-style-type: none"> <li>“Elimination of vehicular access to the marsh area, installation of access control barriers and control of visitor access to specific areas at specific times.</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>Site-specific conservation objectives and measures have been focused on those habitats and species for which the site has been designated and to mitigate the pressures that are known to negatively impact the habitats and</p>

	<ul style="list-style-type: none"> <li>• Assessment of existing surfaced routes for which vehicular access may be acceptable.</li> <li>• Assessment of appropriate areas where static machinery can be installed, where no damage or disturbance to species or habitats of conservation value occurs.</li> <li>• Public access routes between garrigue and marshland to be channelled to the raised timber pathway.</li> <li>• All external lighting installed on site should be downward pointing, full cutoff type.</li> <li>• Globes, uplighters, and floodlights should not be allowed.</li> <li>• Any lighting to pathways is to be switched off when Visitors' Centre is closed.</li> <li>• Artificial lighting beyond the Visitors Centre should not be used.</li> <li>• Cleaning of Saltmarsh</li> <li>• Preliminary works on invasive species eradication</li> <li>• Stormwater works"</li> </ul> <p><b>Further action:</b></p> <ul style="list-style-type: none"> <li>• The points mentioned above align more closely with our organisation's vision of addressing light pollution through clear and robust mitigation measures.</li> <li>• Consideration should also be given to the nearby Coast Road, hotels, and tourism facilities, with a focus on addressing light pollution from these sources and preventing any further intensification of light pollution.</li> </ul>	<p>species within the Natura 2000 site in question. In this case, light pollution is not a direct pressure impacting any habitats and species for which the Natura 2000 site has been designated. Notwithstanding this, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
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	<p><b>MT0000008: L-GHADIRA S-SAFRA U L-ISKOLL TAL-GHALLIS</b></p> <p>Conservation Order for this site G.N. 1373 of 2016 does not mention of light pollution.</p> <p><b>Further actions:</b></p> <ul style="list-style-type: none"> <li>Mitigation measures for light pollution must be integrated in the Conservation Order, in line with ERA's guidelines for light pollution mitigation and the recommendations outlined in <b>Annex 1</b>.</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>Site-specific conservation objectives and measures have been focused on those habitats and species for which the site has been designated and to mitigate the pressures that are known to negatively impact the habitats and species within the Natura 2000 site in question. In this case, light pollution is not a direct pressure impacting any habitats and species for which the Natura 2000 site has been designated. Notwithstanding this, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
	<p><b>MT0000009: L-INHAWI TAR-RAMLA TAT-TORRI U TAL-IRDUM TAL-MADONNA</b></p> <p>Light pollution and its effects on bird colonies are addressed within the Natura 2000 Management Plan as follows:</p> <ul style="list-style-type: none"> <li>On page 5: "During stakeholder consultation it was identified that camping often includes the use of noisy generators and excessive lighting."</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document, which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>The mitigation of light pollution has been included in the site-specific conservation objectives and measures policy document to ensure that any works, activities or any new developments proposed within and in the</p>

	<ul style="list-style-type: none"> <li>• On page 6: “Light pollution, mainly from the settlements to the south of the site, also has a significant impact on the breeding seabird colonies and on the general ecological quality of the site.”</li> <li>• On pages 7-8, with regards to the management of the Local Natura 2000 Management Plan Council camping site: “Damage to the trees happens regularly and disturbance to the surrounding area occurs mainly through loud noise and light at night time.” “It was questioned whether the Local Council campsite is compatible with the International Bird Area (IBA) and SPA status of the site.”</li> <li>• On page 91, with regards to <i>Puffinus yelkouan</i>: “Increased human disturbance result in reduced numbers returning to the breeding colony in following years. Another threat to this species is light sources on the mainland. Attracted by the light fledglings have been recovered inland where they were found to be disoriented (Sultana et al, 2011). In 2008, IUCN and Birdlife International revised this species status from Secure to Near Threatened.”</li> <li>• On pages 95-96, with regards to <i>Puffinus yelkouan</i>: “Although I-irdum tal-Madonna support the best breeding population of this species in the Maltese Islands, nonetheless, the population continues and will continue to face a number of threats. Some of these continue to be managed (including the rat eradication programme), however, others have yet to be adequately addressed. One such issue relates to light pollution. Raine et al (2007) considered the effect of light pollution on the <i>P. yelkouan</i> colony. They identified a number of sources of light pollution that fledglings. Light pollution sources in the area include Cirkewwa, White Tower Bay, Ghadira, Mellieha, Bugibba, and Rdum tal-Madonna. Threats at sea should also be considered. Light pollution from boats are also known to have negative effects (Raine et al, 2007).”</li> <li>• On page 105, with regards to use of the site by informal campers: “The Mellieha Local Council passed a bye-law to regulate the situation and limiting permits to designated areas. Notwithstanding the permitting in</li> </ul>	<p>vicinity of the site are assessed with respect to potential light pollution, and any preventive/mitigation measures to reduce disturbance to birds are adopted accordingly. From a permitting perspective, it is to be noted that Environmental Permits contain relevant conditions to reduce light pollution where relevant (for activities/intervention/works that require use of lights).</p> <p>A Notice to Mariners No. 44 of 2020 is also currently active, which includes light and sound restrictions for the coastal marine area of Ponta ta’ I-Aħrax and Daħlet ix-Xilep.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
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		<p>place the system is being abused and has resulted in the following problems: littering which deteriorates the landscape and increases the rat population, noise and light pollution which are a nuisance to bird communities breeding in the cliffs below and trampling and off-road driving which accelerate soil erosion.”</p> <ul style="list-style-type: none"> <li>• On page 109: “Artificial night light, mainly from the settlements to the south of the site, has a considerable impact on the area. Light pollution has a negative impact specifically on the bird colonies present. In 2007, a report called ‘Light pollution and its effect on Yelkouan Shearwaters in Malta; causes and solutions’ was written in preparation of the EU LIFE Project Management Plan.”</li> <li>• On page 115, with regards to the management of the local council camping site: “A lot of damage is made to the trees and the surrounding area mainly through loud noise and light at night time.”</li> <li>• On page 126, with regards to Yelkouan Shearwater <i>Puffinus yelkouan</i>: “Malta has approximately 10% of the world's breeding population of the Yelkouan Shearwater <i>Puffinus yelkouan</i> and Rdum tal-Madonna has the largest colony with around 366-544 breeding pairs. The burrows and crevices within the calcareous rocky slopes are the characteristic nesting habitat of the species. The population was on the decline in recent years and became the focus of an EU LIFE Nature Project which included the following mitigation actions: <ul style="list-style-type: none"> <li>i. Eradication of predators;</li> <li>ii. Measures against sound and light pollution;</li> <li>iii. Prevention of inappropriate access;</li> <li>iv. Prevention of inappropriate development in the vicinity of the SPA;</li> <li>v. Identification of Marine SPAs; and</li> <li>vi. Extensive monitoring.</li> </ul> </li> <li>• On page 132, with regards to Yelkouan Shearwater <i>Puffinus yelkouan</i>: “The aim of the project population, i.e. predation by rats, loss of breeding habitat, human disturbance, accidental by-catch in long-line fisheries,</li> </ul>	
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		<p>light and noise pollution and lack of designated marine protected sites for Yelkouan Shearwaters. It is also intended to improve the project site by limiting inappropriate access, raising awareness of the importance of the protected area and encouraging positive behaviour from visitors.”</p> <ul style="list-style-type: none"><li>• On page 138: “Light pollution, mainly from the settlements to the south of the site, has a considerable impact on the Yelkouan Shearwater colony and on the general ecological quality of the site, but it is rather impossible to deal with. The LIFE project produced a report on light pollution from marine sources and its impacts on seabirds suggesting ways of control and reduction. As a result, official support was granted through the publication, by Transport Malta, of Notice to Mariners No 06 of 2008 (later NTM 2 of 2010). According to this legal order:<p>A buffer zone to the SPA is defined between “Ponta tal-Ahrax” and “Dahlet ix-Xilep” about 1.1 nautical miles from shore where the following regulations apply:</p><p>Masters of all vessels and crafts are to adhere to the following conduct while transiting the area between Friday 1st February 2008 and Wednesday 30 July 2008, applicable 2 hours before sunset until 2 hours after sunrise. During the above-mentioned period:</p><ul style="list-style-type: none"><li>○ Lights, other than lights prescribed in the COLREGs have to be switched off and no loud noise, other than sound signals prescribed in the COLREGs, from vessels is allowed whilst moving along this stretch of coast.</li><li>○ Pleasure cruises operating as “floating discos” are obliged to follow the above guideline and switch all light and music while passing in the indicated area or otherwise keep clear from the buffer zone to the SPA</li><li>○ The letting off of petards and other fireworks from sea is not allowed in the buffer zone to the SPA during the above-mentioned dates at any time</li></ul></li></ul>	
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		<ul style="list-style-type: none"> <li>○ The buffer zone to the SPA is a “no stopping zone” for all vessels other than vessels licensed to carry out fishing activities</li> <li>○ Fishing activities in the area using strong lights (lampara etc) are prohibited</li> </ul> <ul style="list-style-type: none"> <li>● On page 139, with regards to free camping and caravans and its effects on Yelkouan Shearwater nesting failures: “Other resulting problems are: subsequent off-road driving, trampling of vegetation, noise and light pollution and landscape degradation. The problem was also of the elaboration of this Management Plan. The use of generators and strong lights was identified as a major problem, which is also resulting in the abandonment of nesting areas by the shearwaters, which are moving further to the north of the peninsula. Suggestions and requests by the stakeholders ranged from clear delineation of camping areas to abolishing of free camping in the site as incompatible with the protected character of the area.”</li> <li>● In table 20, on 142: noise and light pollution are identified as causing disturbance to the Seabird colony, having a medium intensity and localised extent.</li> <li>● On page 148, light pollution is also identified as a negative factor impacting <i>Calonectris diomedea</i></li> </ul> <p><b>Further actions:</b></p> <ul style="list-style-type: none"> <li>● Addressing light pollution and sky glow from the Ćirkewwa ferry terminal is of paramount importance. Engaging in dialogue with relevant stakeholders is essential, as this terminal represents a major source of light pollution in the area. Implementing targeted lighting solutions instead of the current floodlights and adopting lighting systems that meet the criteria outlined in the ERA guidelines for reduction of light pollution and in Annex 1 are critical measures.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Efforts to mitigate light pollution from the settlements south of the site, though challenging and described as “impossible to deal with” in the Management Plan, must be pursued diligently.</li> <li>• Ensuring no light trespass onto the cliffs or sand dunes of Ramla tat-Torri, and reducing light pollution from the boat houses and camping sites in the Ramla tat-Torri area.</li> <li>• To address the growing development and use of powerful lights directed towards the sea and extending to the Rdum tal-Madonna cliffs from locations such as Armier, Mellieħa, Buġibba, Baħar iċ-Ċaġħaq, and even Sliema, it is crucial to focus on both the overall sky glow and specific point sources, particularly from coastal resorts and clubs.</li> <li>• Furthermore, the impact of light pollution from bunkering ships located near the colony must also be considered.</li> <li>• With regards to this site, reference is made to the following article: Raine, Helen &amp; Borg, John &amp; Raine, Andre &amp; Bairner, Suzanne &amp; Cardona, Matthew. (2007). Light Pollution and its Effect on Yelkouan Shearwaters in Malta; Causes and Solutions. (<a href="https://www.researchgate.net/publication/242353437_Light_Pollution_and_its_Effect_on_Yelkouan_Shearwaters_in_Malta_Causes_and_Solutions#full-text">https://www.researchgate.net/publication/242353437_Light_Pollution_and_its_Effect_on_Yelkouan_Shearwaters_in_Malta_Causes_and_Solutions#full-text</a>)</li> </ul>	
		<p><b>MT000011: GħAR DALAM</b></p> <p>Light pollution is mentioned extensively in the Conservation Order G.N. 1375 of 2016, with clear and robust mitigation measures, as follows:</p> <ul style="list-style-type: none"> <li>• Page 10049 (page 3 of document): “Whereas Għar Dalam is considered to be of considerable value from a palaeontological, archaeological, geomorphological, and ecological perspective, it receives up to 55,000 visitors annually and visitor impacts, in particular lighting inside the cave, affect its state of conservation. The main threats to the site revolve around the increased access to part of the habitat of the priority Annex II species allowed in the past and the limited potential for habitat expansion due to the site’s social importance. The following approach to the site’s conservation will be taken:</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>The mitigation of light pollution has been included in the site-specific conservation objectives and measures policy document for the site in question. Mitigation of light pollution has also been carried out by Heritage Malta within the cave system.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the</p>

		<p>A. Maintaining the cave habitat in a good conservation status</p> <ol style="list-style-type: none"> <li>1. The site manager shall, within two years from the issue of this Order, commence a study to determine the sustainable carrying capacity of the cave in order to determine the number of visitors that the cave system can accommodate at any one time without jeopardising the cave’s favourable conservation status as well as that of <i>Rhinolophus hipposideros</i> in particular.</li> <li>2. The site manager shall, within two years from the issue of this Order, install equipment to monitor the environmental conditions within the cave. Measurements to include light intensity, relative humidity, oxygen, and temperature.”</li> </ol> <ul style="list-style-type: none"> <li>• Pages 10050-10051 (pages 4-5 of document): “B. Extending the habitat of <i>Armadillidium ghardalamensis</i> and <i>Rhinolophus hipposideros</i> <ol style="list-style-type: none"> <li>1. The site manager shall reduce the amount of artificial light in Ghar Dalam by: <ol style="list-style-type: none"> <li>a. ensuring that no more lights are added inside the cave beyond the present location (c. 60m from the cave entrance),</li> <li>b. replacing the existing lights with ones that are more environmentally friendly and ideal for cave systems (including to prevent the growth of lamp flora)</li> <li>c. use directional lighting to focus attention on specific features rather than illuminate a whole area,</li> <li>d. use dimmable lights, and/or</li> </ol> </li> </ol> </li> </ul>	<p>general public against which existing and future lighting sources would need to abide by.</p>
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		<p>e. use motion sensors to only switch on the lighting system when people are inside the cave and then only in the part of the cave where they are found.</p> <p>These changes shall take place by the third year following the issue of this Conservation Order.</p> <p>2. As a result of the changes in the lighting system described in B(1) above, and in particular the removal of lights from the inner part of the cave (already being implemented), the site manager shall ensure that the area of the cave system that is open to the public will remain restricted to the initial 60m.</p> <p>3. The site manager shall monitor the response of <i>Armadillidium ghardalamensis</i> and <i>Rhinolophus hipposideros</i> to the reduction in light/extension of the dark area. This monitoring study shall follow a Method Statement, which shall be prepared by the site manager and submitted to ERA for approval. The monitoring shall take place over a minimum period of one year following the implementation of the changes in the lighting system, following which any changes in the conservation measures at the site that may be required to address the findings of the monitoring report, will be implemented.”</p> <ul style="list-style-type: none"> <li>• Page 10052 (page 6 of document): “The use of strong lights at night at developments or during activities within a distance of 100m of the cave entrance (see Figure 3) shall be prohibited unless they can provide clear evidence that the lighting will not result in a light intensity greater than 1 Lux within 10m of the cave entrance (see Figure 3).”</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Page 10053 (page 7 of document): “Lighting in the gardens and the path leading to the cave shall be kept to a minimum and located at the level of the footpath and be downward pointing to minimise glare at the cave entrance.</li> </ul> <p>Further actions:</p> <ul style="list-style-type: none"> <li>• With regards to the above, we recommend extending the buffer zone from the current 100 meters to 200 meters from the line of sight of the cave entrance and from Wied Dalam.</li> <li>• The use of floodlights must be strictly prohibited</li> <li>• It is equally important to ensure that the authority responsible for the site is equipped with the necessary expertise and equipment to conduct light pollution assessments effectively, accompanied by robust enforcement mechanisms and corrective actions where required.</li> </ul>	
		<p><b>MT0000013: IĊ-ĊITTADELLA</b></p> <p>Light pollution is mentioned in the Conservation Order G.N. 797 of 2024, as follows:</p> <p>“D. Regulation of Activities</p> <p>5. The use of bright lights shone directly on the entrances of tunnels/shelters and other underground passages known or that have the potential to be used by bats as roosting sites (as indicated in Figure 3 on page 21,860) shall be prohibited. The provision of permanent lighting in these areas shall be subject to approval by ERA. Light in these areas will only be allowed by ERA if it is not lit directly on the entrances of the bat roosting sites and with the presentation of clear evidence that any new light will not result in a power of light greater than 1 Lux up to 10m away from the entrance of the bat roosting sites.”</p> <p><b>Further actions:</b></p> <ul style="list-style-type: none"> <li>• With regards to the above, we wish to highlight the importance of ensuring the availability of the necessary expertise and equipment to perform</li> </ul>	<p>The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>The mitigation of light pollution has been included in the site-specific conservation objectives and measures policy document, for the site in question, to ensure that any works, activities or any new developments proposed within and in the vicinity of the site are assessed with respect to potential light pollution, and any preventive/mitigation measures to reduce disturbance to bats are adopted accordingly.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>

		<p>these measurements, as well as the implementation of appropriate enforcement and corrective actions.</p> <ul style="list-style-type: none"> <li>• Floodlights must be replaced with targeted fixtures, in line with ERA guideliens for reduction of light pollution and with <b>Annex 1</b>.</li> <li>• There should be no lights pointing at bat roost entrances and no light trespass onto bat roosting site.</li> </ul>	
		<p><b>MT0000014: IL-BALLUT TA' MARSAXLOKK</b></p> <p>With regards to this site, light pollution is mentioned in the site’s Natura 2000 Management Plan, as follows:</p> <ul style="list-style-type: none"> <li>• On page 5: “Noise and light pollution may be a limiting factor to wildlife, given the small size of the site and the urbanized surroundings.”</li> <li>• On page 76, light pollution is identified as one of the non-point factors impacting the site: “Noise and light pollution may be a serious threat or limiting factor to wildlife, given the small size of the site and the urbanized surroundings.”</li> <li>• In table 8 on page 77, adjacent human activity consisting of the distributor road, the marina, and recreation facilities, are identified as contributing to light pollution, having a medium intensity and a localised extent.</li> </ul> <p><b>Further actions:</b></p> <ul style="list-style-type: none"> <li>• Although the sources of light pollution have been identified, there are no clear guidelines or suggestions on how to address or mitigate it.</li> <li>• Light pollution mitigation measures should follow the ERA guidelines for reduction of light pollution and the recommendation in Annex 1.</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document, which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>Site-specific conservation objectives and measures have been focused on those habitats and species for which the site has been designated and to mitigate the pressures that are known to negatively impact the habitats and species within the Natura 2000 site in question. In this case, light pollution is not a direct pressure impacting any habitats and species for which the Natura 2000 site has been designated. Notwithstanding this, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>

	<p><b>MT0000015: L-INĦAWI TAL-GĦADIRA</b></p> <p>Unfortunately, this site's Natura 2000 Management Plan fails to address light pollution, despite the area's considerable ecological importance and its inclusion of the Għadira Nature Reserve.</p> <p><b>Further actions:</b></p> <ul style="list-style-type: none"> <li>• No new lights, including streetlights, should be installed to prevent further intensification of light pollution.</li> <li>• Any new developments on this site must not be connected to the grid to avoid contributing to the increase of light pollution.</li> <li>• Concerning the recently announced upgrade and expansion of 'The Ċumnija Wastewater Treatment Plant' at Qammieġh, which lies within this Natura 2000 site, both existing and any planned new lighting systems must comply with the ERA's guidelines for light pollution reduction and the recommendations outlined in Annex 1.</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document, which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>The mitigation of light pollution has been included in the site-specific conservation objectives and measures policy document, for the site in question, to ensure that any works, activities or any new developments proposed within and in the vicinity of the site are assessed with respect to potential light pollution, and any preventive/mitigation measures to reduce disturbance to birds are adopted accordingly.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
	<p><b>MT0000016: FILFLA U L-GĴEJER TA' MADWARHA</b></p> <p>Light pollution with regards to this site is mentioned in the Conservation Order G.N. 1377 of 2016, as follows:</p> <ul style="list-style-type: none"> <li>• On page 10,075 (page 3 of document): "Whereas Filfla and its islets are considered to be of considerable value from a scientific, ornithological, geomorphological, and ecological perspective, and whereas they benefit from relative isolation and a restricted access regime under existing legislation, they still suffer from unmitigated impacts from poaching, unauthorised access (including within its waters), apart from natural effects caused by weather (including erosion) and biodiversity interactions. The main threats to the site revolve around disturbance to</li> </ul>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>The mitigation of light pollution from coastal zone developments has been included in the site-specific conservation objectives and measures policy document, for the site in question, to reduce risk of light-induced seabirds' strandings.</p>

	<p>the populations of Annex I breeding birds from poaching, light pollution from vessels, unauthorised landings, and interspecific predation.”</p> <ul style="list-style-type: none"> <li>On page 10,078 (page 6 of document): “D. Regulation of Activities 6.Any vessels entering the buffer zone established under regulation B(4) above (see Figure 2) at night, shall switch off all bright lights except those strictly required for safe navigation purposes and shall ensure that no lights are shone on the islet itself. Lampara fishing is prohibited within 1nm of the islet.”</li> </ul> <p><b>Further actions:</b></p> <ul style="list-style-type: none"> <li>Given that the site is home to the largest population of Mediterranean Storm Petrel <i>Hydrobates pelagicus melitensis</i>, and carries significance as a seabird breeding site, light pollution from the West Coast of the island should also be addressed to help conserve the current bird population and prevent their disorientation.</li> <li>With regards to this site, reference is made to the following article: Raine, Helen &amp; Borg, John &amp; Raine, Andre &amp; Bairner, Suzanne &amp; Cardona, Matthew. (2007). Light Pollution and its Effect on Yelkouan Shearwaters in Malta; Causes and Solutions. (<a href="https://www.researchgate.net/publication/242353437_Light_Pollution_and_its_Effect_on_Yelkouan_Shearwaters_in_Malta_Causes_and_Solutions#full-text">https://www.researchgate.net/publication/242353437_Light_Pollution_and_its_Effect_on_Yelkouan_Shearwaters_in_Malta_Causes_and_Solutions#full-text</a>)</li> <li>Measures for reduction of light pollution should follow ERA’s guidelines for the reduction of light pollution and recommendations in Annex 1.</li> </ul>	<p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
	<p><b>MT000022: IL-GĴEJJER TA' SAN PAWL (SELMUNETT)</b></p> <p>Light pollution is mentioned in the Conservation Order G.N. 1378 of 2016, as follows:</p> <p>“C. Regulation of Activities</p> <p>21. Within one year of the issue of this Order, the site manager shall commission a study to determine the impact on the islets’ biodiversity of the</p>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p>

	<p>lights introduced to light up the statue of St Paul and shall subsequently implement any corrective measures proposed by the study.”</p> <p><b>Further actions:</b></p> <ul style="list-style-type: none"> <li>• With regards to the above, we would also like to stress the importance of regulating touristic, recreational, and maritime activities in the vicinity of the site.</li> <li>• The St Paul statue should not be lit up for any period of the night during the time of year when shearwaters visit the colony on the islet, this being October to July.</li> <li>• To address the growing development and use of powerful lights directed towards the sea and extending towards this site from locations such as Armier, Mellieħa, Buġibba, Baħar iċ-Ċaġħaq, and even Sliema, it is crucial to focus on both the overall sky glow and specific point sources, particularly from coastal resorts and clubs.</li> <li>• Furthermore, the impact of light pollution from bunkering ships located near the colony must also be considered.</li> <li>• With regards to this site, reference is made to the following article: Raine, Helen &amp; Borg, John &amp; Raine, Andre &amp; Bairner, Suzanne &amp; Cardona, Matthew. (2007). Light Pollution and its Effect on Yelkouan Shearwaters in Malta; Causes and Solutions. (<a href="https://www.researchgate.net/publication/242353437_Light_Pollution_and_its_Effect_on_Yelkouan_Shearwaters_in_Malta_Causes_and_Solutions#full-text">https://www.researchgate.net/publication/242353437_Light_Pollution_and_its_Effect_on_Yelkouan_Shearwaters_in_Malta_Causes_and_Solutions#full-text</a>)</li> <li>• Light pollution mitigation measures should comply with ERA’s guidelines for the reduction of light pollution and with recommendations in Annex 1.</li> </ul>	<p>Site-specific conservation objectives and measures have been focused on those habitats and species for which the site has been designated and to mitigate the pressures that are known to negatively impact the habitats and species within the Natura 2000 site in question. In this case, light pollution is not a direct pressure impacting any habitats and species for which the Natura 2000 site has been designated. Notwithstanding this, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p> <p>Regarding visitor access, this is covered through the policy document in question and also through S.L. 549.03; while keeping in mind that the consultation in question is linked to terrestrial areas.</p>
	<p><b>MT000023: IL-MAGĦLUQ TAL-BAĦAR TA’ MARSASKALA</b></p> <p>Light pollution is identified and mentioned in the site’s Natura 2000 Management Plan on page 66 as follows:</p> <p>“Another distracting feature is the built-up area around the restaurant and its adjacent gardens, which may have been wetland habitat in the distant past.</p>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document, which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p>

	<p>Activities at this outdoor venue may result in noise and light pollution effects, but its low use throughout the year helps to mitigate such effects.”</p> <p><b>Further actions:</b></p> <ul style="list-style-type: none"> <li>• In this context, it is essential to ensure that these activities remain minimal to prevent further light pollution. Should an intensification of activities occur, appropriate light pollution mitigation measures must be implemented.</li> <li>• There should be no light trespass onto fish ponds at this site</li> <li>• Light pollution must be addressed as per ERA’s guidelines for the reduction of light pollution and as per Annex 1.</li> </ul>	<p>Site-specific conservation objectives and measures have been focused on those habitats and species for which the site has been designated and to mitigate the pressures that are known to negatively impact the habitats and species within the Natura 2000 site in question. In this case, light pollution is not a direct pressure impacting any habitats and species for which the Natura 2000 site has been designated. Notwithstanding this, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
	<p><b>ANNEX 1</b></p> <p>Light pollution is not consistently addressed or mentioned to the same extent across different Natura 2000 site Management Plans and Conservation Orders, and in some areas, it is completely absent. Below, we propose a set of measures, some of which are already partially included in existing Management Plans and Conservation Orders. However, these measures need to be enhanced with more precise, targeted actions, stricter restrictions, and stronger enforcement to ensure their effectiveness. Additionally, we emphasise the importance of applying these same principles to manage light pollution from nearby urban areas that contribute to light pollution within these Natura 2000 sites. Our suggestions for addressing light pollution are based on based on the recommendations set forth by ‘Dark Sky International’ (<a href="https://darksky.org/">https://darksky.org/</a>), the latter being depicted in the images below.</p>	<p>The feedback provided is appreciated and duly noted. The current consultation is not on the 2016 Management Plans and Conservation Orders, but on the policy document which presents the new Conservation Objectives and Conservation Measures for selected Natura 2000 sites as published at: <a href="https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/">https://era.org.mt/public-consultation-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites-set-1/</a>.</p> <p>Site-specific conservation objectives and measures have been focused on those habitats and species for which the site has been designated and to mitigate the pressures that are known to negatively impact the habitats and species within the Natura 2000 sites in question. Light pollution was identified as a possible pressure mainly for faunal species (e.g. birds, bats). Therefore, objectives and measures to mitigate the negative effect of light pollution will be included where such species are present. Notwithstanding this, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the General Objectives and Measures</p>

## Five Lighting Principles for Responsible Outdoor Lighting



- Responsible outdoor lighting is
- 1 Useful**  
**Use light only if it is needed**  
 All light should have a clear purpose. Consider how the use of light will impact the area, including wildlife and their habitats.
  - 2 Targeted**  
**Direct light so it falls only where it is needed**  
 Use shielding and careful aiming to target the direction of the light beam so that it points downward and does not spill beyond where it is needed.
  - 3 Low Level**  
**Light should be no brighter than necessary**  
 Use the lowest light level required. Be mindful of surface conditions, as some surfaces may reflect more light into the night sky than intended.
  - 4 Controlled**  
**Use light only when it is needed**  
 Use controls such as timers or motion detectors to ensure that light is available when it is needed, dimmed when possible, and turned off when not needed.
  - 5 Warm-colored**  
**Use warmer color lights where possible**  
 Limit the amount of shorter wavelength (blue-violet) light to the least amount needed.



document, for which a public consultation will be carried out in due course. The information provided will hence be taken into consideration as relevant.

Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.

Categorisation figure duly noted.

	<p>Our recommendations for the reduction of light pollution are as follows:</p> <ol style="list-style-type: none"> <li>1. Develop and enforce regulations to ensure light levels consistently meet ERA's proposed standards within a <b>clearly defined time frame</b>.</li> <li>2. We take this opportunity to highlight the <b>urgent need for the 'Guidelines for the Reduction of Light Pollution in the Maltese Islands'</b>, published by ERA (<a href="https://era.org.mt/wp-content/uploads/2020/06/Guidelines-for-the-Reduction-of-Light-Pollution-in-the-MI-PC-Draft.pdf">https://era.org.mt/wp-content/uploads/2020/06/Guidelines-for-the-Reduction-of-Light-Pollution-in-the-MI-PC-Draft.pdf</a>), which are currently in draft format, to be <b>finalised and formalised into legislative and enforceable standards</b>. The application of these guidelines within Natura 2000 sites and across the Maltese Islands will establish a unified, objective, and reproducible strategy to manage light pollution in ecologically sensitive areas. This approach will address the broader impact of light pollution across the Maltese Islands, including these ecologically sensitive regions. Once finalised, these guidelines should serve as the foundation for new regulations addressing light pollution, with clear designation of the government agency responsible for enforcement. The responsible entity must be equipped with sufficient resources, including enforcement officers, and the legislation should specify the process for issuing warnings or penalties, subject to judicial review. Additionally, a task force should be established to identify key areas of light pollution, coordinate efforts among various stakeholders and government bodies, and direct enforcement to the most problematic locations.</li> <li>3. Set clear, enforceable <b>performance indicators</b> to monitor and maintain light pollution levels within acceptable thresholds, ensuring <b>ongoing control and enforcement efforts</b>.</li> <li>4. Address <b>disturbances from recreational activities</b> and other activities that could pose risks to ecosystems within Natura 2000 sites, such as BBQs and camping, through the issuance of appropriate permits.</li> <li>5. Promote <b>sustainable tourism practices</b> that align with conservation objectives.</li> </ol>	<p>Recommendations are duly noted. The 'Guidelines for the Reduction of Light Pollution in the Maltese Islands', which will be adopted shortly, cover such considerations.</p> <p>Meanwhile, relevant site-specific measures are included as relevant. Furthermore, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the General Objectives and Measures document, for which a public consultation will be carried out in due course.</p>
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	<ol style="list-style-type: none"> <li>6. Control light pollution emanating from <b>sites of significant architectural or cultural value, including statues, monuments, and towers</b>, both within Natura 2000 sites and in nearby areas.</li> <li>7. <b>Identify existing sources of light pollution contributing to each site</b> and develop targeted mitigation strategies in line with ERA guidelines, integrating these into site management plans and conservation orders.</li> <li>8. <b>Establish and/or extend buffer zones</b> around protected areas to reduce adverse impacts and enhance conservation capacity. Where already present, buffer zones should be extended to 200m to counteract the effects of light pollution from nearby settlements and facilities.</li> <li>9. Define <b>clear land use and management guidelines</b> for areas adjacent to protected sites.</li> <li>10. <b>Regulate economic activities</b> that pose risks to protected areas, including specific design and development considerations within buffer zones.</li> <li>11. Apply additional measures related to <b>residential, commercial, industrial, and recreational infrastructure, operations, and activities, including new developments within and near the site</b>.</li> <li>12. <b>Streetlights in the vicinity of the site</b> should be dimmed or switched off after a specified time to reduce light pollution, depending on traffic.</li> <li>13. Where lighting installations are required, the following should apply <ol style="list-style-type: none"> <li>a) Lighting should be strictly limited to within the required area of the site.</li> <li>b) The development or works being permitted should not be considered as a justification for the lighting of the access roads, tracks and paths leading to the site or other lighting beyond the site boundary.</li> <li>c) To mitigate light pollution, any external lighting should have a correlated colour temperature (CCT) lower than 2300 Kelvin, or G-index <math>\geq 1.5</math>, and employ lighting fixtures that are downward facing</li> </ol> </li> </ol>	
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		<p>and full cut-off. <b>Globes, up-lighters, and floodlights should not be allowed.</b></p> <p>d) Lighting fixtures should illuminate only where needed to prevent light trespass.</p> <p>e) Any illumination that is employed should take into account the reflectivity of the surrounding surface to mitigate skyglow as well as glare.</p> <p>f) Any lighting that is not strictly necessary or in a less travelled area should be installed with a motion sensor or timer to power off or dimmed when not required.</p> <p>g) Adequate checks before and after the works should take place, and corrective measures implemented as necessary.</p> <p>h) The lighting has to be from any peripheral landscaping inward, so as to be screened as much as possible by the landscaping itself. Moreover, the Planning Authority and/or the entity responsible for the site should request that as part of the works, should the permit application be granted, ALL existing exterior lighting on site be changed to conform with the above conditions.</p> <p>It is vital to highlight the importance of ensuring that the responsible authority and/or site manager has <b>access to the necessary expertise and equipment</b> to conduct the required measurements, ensuring full compliance of lighting systems with the specified criteria and guidelines. Furthermore, the <b>implementation of effective enforcement and corrective actions</b> is essential.</p>	
9	<p>Nicholas Barbara  BirdLife Malta</p>	<p><b>1. General Comments</b> BirdLife Malta presents the following comments and recommendations in response to the public consultation on the Conservation Objectives and Measures for Malta’s terrestrial Natura 2000 sites.</p>	<p>Comment has been duly noted. This revision process has started in 2021 as per: <a href="https://era.org.mt/intent-and-objectives-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites">https://era.org.mt/intent-and-objectives-conservation-objectives-and-measures-for-maltas-terrestrial-natura-2000-sites</a>. Following that, the revision process was kick-started. This involved the gathering of updated data through field surveys and the commissioning of studies to obtain</p>

	06/12/2024	<p>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 eight years after the previous publication. Therefore, we wish to emphasise the urgency of finalising and publishing these plans, as the statutory five-year review period has been exceeded by three years.</p>	<p>improved knowledge and fill in any knowledge gaps. Furthermore, the review of the past objectives and measures have been carried out to determine the progress made, and the respective effectiveness. Furthermore, stakeholder involvement is an integral part of this revision process, where the drafted site-specific objectives and measures were discussed with relevant entities that are involved in the management of such Natura 2000 sites. This whole process led to the identification of the SMART objectives and measures.</p>
		<p>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 the necessary restoration measures. Consequently, the conservation measures of Natura 2000 sites should now aim to ensure compliance with the objectives and targets outlined in this regulation.</p>	<p>ERA is following the implementation of this newly adopted Regulation and hence of the provisions therein. Relevant steps will be taken accordingly.</p>
		<p><b>1.1. Timeframes</b></p> <p>The conservation measures and objectives presented list several measures executable within stipulated timeframes categorised as short-term, medium-term and ongoing. While these measures are intended to improve the conservation status of habitats and species, we believe the timeframes are overly generic, and should be well specified in the respective management plans. They should be made more precise by specifying the exact year(s) when each measure will be implemented and its duration in months. This would demonstrate a stronger commitment from ERA to adhere to the proposed timelines. Additionally, presenting these timeframes in a visual format, such as a Gantt chart, would enhance clarity and provide a more effective overview of the planned actions for the five-year management period.</p>	<p>Comment has been duly noted.</p> <p>A clearer indication of the timeframes have been now included at the beginning of the policy document (short term – within less than three years; medium term – between three to five years and long-term – action will be initiated before 2030 with its completion beyond 2030).</p> <p>A Gantt chart will certainly be tool that would be used by the Authority to track all the measures for all of the Natura 2000 sites.</p>

	<p><b>1.2. Involvement of Stakeholders</b></p> <p>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 AM, 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.</p>	<p>Comment has been duly noted.</p> <p>The approach taken for the policy document in question is to indicate the government entities involved as Lead/Supporting Parties.</p> <p>A measure related to the involvement of stakeholders will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course; this shall be applicable for all the Natura 2000 sites. Furthermore, an increase in stakeholder awareness regarding the ecological importance of the sites and responsible behaviour will also be addressed in this policy document.</p>
	<p><b>1.3. Specification of human impacts and their management</b></p> <p>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 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 like fireworks and outdoor events near sensitive habitats throughout the year. Over the past summer months, we have witnessed ourselves how certain human activities such as off-road makeshift parking areas for events, or even music events, are completely outside ERA's remit of control, even though these would be causing considerable disturbance or even habitat damage within the boundaries or just off the boundaries of a Natura 2000 site. There is a dire need that where such lacunae exist, these become enforceable and executable in the interest of protecting such Natura 2000 sites from abuse, and more so being unable to enforce and prosecute when such breaches result. The drafting of a list of</p>	<p>The management plans are explicitly indicating all identified pressures and treats that are impacting protected areas which need to be addressed. Regulation 18 of the Flora, Fauna and Natural Protection Regulations (S.L. 549.44) restricts operation and activities within SACs and SPAs without a prior consent from ERA. ERA may either refuse the proposal or issue its consent imposing conditions or other provisions deemed fit and appropriate to impose. In addition to Regulation 18 of S.L. 549.44, the Environmental Permitting (Procedure for Applications and their Determination) Regulations (S.L. 549.172) have been published to streamline, and for some sectors, replace existing permitting regimes covering a multitude of operations, interventions or activities. In addition, the regulatory scope will be extended to other areas that are currently unregulated.</p>

		<p>permitted and non-permitted activities should be one of the results of the management plan for the N2K site and a buffer area to it.</p>	
		<p>Furthermore, the plan overlooks the threat of chemical alterations to water bodies caused by fertilisers and pesticides used in agriculture. Agricultural practices in or around sites such as Is-Simar, Is-Salini, and L-inħawi tal-Għadira 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.</p>	<p>Management of these Natura 2000 sites is considered part of a wider management framework for the conservation of aquatic ecosystems pursuant to the EU Water Framework Directive (WFD). In this regard, Malta's 3rd River Basin Management Plan (RBMP) stipulates and implements monitoring processes related to water quality in the water bodies forming part of the Natura 2000 sites mentioned here and informing the necessary management processes under both the EU Habitats Directive and the EU WFD. The latter include overarching actions in relation to fertiliser and pesticide use, as well as targeted action for the restoration of these water bodies as collectively included in Malta's 3rd River Basin Management Plan and Natura 2000 management processes.</p> <p>A measure will be included in the <i>General Objectives and Measures</i> policy document, for which a public consultation will be carried out in due course, regarding raising awareness about the ecological importance of the sites and the adoption of good sustainable practices.</p>
		<p><b>1.4. Means of verification</b></p> <p>The measures and objectives do not include means of verification to assess whether the proposed objectives are being met. Moreover, 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.</p>	<p>The objectives for each habitat and species are all linked with a target that needs to be reached following the implementation of the measure. A performance indicator and a timeframe is included for each measure to assess its effectiveness following completion. This is the means of verification that is being adopted, in line with normal structures for such processes. Implementation of works carried out as part of the execution of the Natura 2000 Management Plans are from time-to-time also reported through the EU reporting obligations. Further information can be accessed from this link: <a href="#">Environmental Reporting - ERA</a></p>
		<p>Additionally, the presented management plan appears to rely heavily on habitat area, species composition, and population numbers as performance</p>	<p>The choice of these attributes are in line with the EU Habitats Directive and related European Commission Guidance Notes. Habitat area, species</p>

		<p>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. Broader ecological 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.</p> <p>If such analyses are already being conducted or planned by ERA, summary reports should be made publicly available. This would enable stakeholders to provide more informed feedback during public consultations like this one.</p>	<p>composition and population numbers are attributes that are used in EU reporting obligations to determine the conservation status of the habitats and species. Updates on the attributes indicated are available in the reports submitted to the European Commission. Further information can be accessed from this link: <a href="#">Environmental Reporting - ERA</a></p> <p>Various initiatives are followed by ERA in order to be able to set the relevant targets and performance indicators. These form the basis of the policy document issued for public consultation.</p>
		<p><b>1.5. Light Pollution in all Natura 2000 Sites</b></p> <p>Light pollution is an increasingly significant threat to the integrity of Natura 2000 sites and the species they support. 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 that illuminate any part of a Natura 2000 site or cause elevated levels of illuminance within its boundaries. These measures should be part and parcel of the objectives and measures for each Natura 2000 site.</p>	<p>Mitigation of light pollution has been addressed in the conservation objectives and measures for those Natura 2000 sites that support species which are known to be directly impacted by such pressure (e.g. birds, bats). Furthermore, a standard measure related to light pollution, applicable for all Natura 2000 sites will be included in the <i>General Objectives and Measures</i> document, for which a public consultation will be carried out in due course.</p> <p>Furthermore, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
		<p><b>1.6. Waste Collection in all Natura 2000 Sites</b></p> <p>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</p>	<p>The importance of improved waste management practices within Natura 2000 sites is recognised. Given the extent of Special Areas of Conservation (SACs) along the Maltese islands across 37 sites, ERA is identifying particularly problematic areas with the aim of tackling these through a holistic and coordinated approach, utilising Waste Management Systems, CCTVs and also on the ground enforcement.</p>

		<p>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.</p> <p>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.</p>	<p>Furthermore, a standard measure related to waste management, applicable for all Natura 2000 sites will be included in the General Objectives and Measures document, for which a public consultation will be carried out in due course.</p>
		<p><b>1.7. Management of Invasive Alien Species</b></p> <p>The measures and objectives rightly list the removal of existing alien species, however seem to lack the prevention of new invasive alien species. Trained personnel from ERA/AM should actively monitor for signs or traces of new invasive species while conducting other on-site activities.</p> <p>Efforts to remove invasive alien species should also address the establishment of new cat colonies. While practices such as trapping, neutering, and relocation of individuals are beneficial, legislative amendments are needed to prohibit the establishment of cat colonies in specific Natura 2000 sites to safeguard their ecological integrity.</p>	<p>All the measures included to address invasive alien species specifically include the prevention to their introduction. Meanwhile, various monitoring efforts related to invasive alien species are already ongoing.</p> <p>The neutering/relocation of cat colonies in those Natura 2000 sites where it is already a known pressure has been included as a measure. This shall be accompanied by relevant discussions with stakeholders to inform about the potential impacts.</p>
		<p><b>1.8 Financing</b></p> <p>While all measures and objectives proposed in these documents would be great to be implemented, the financing of management plans has been a contentious 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</p>	<p>Since its inception, ERA has made significant progress in allocating both human and financial resources towards the efficient management and administration of Natura 2000 sites. A number of implementing agencies have been set up, including Ambjent Malta, Project Green, EcoGozo, Energy and Water Agency and Heritage Malta. Furthermore, Management Agreements with Non-Government Organisations for the management of several Natura 2000 sites are being financed by the Government.</p> <p>Apart from the allocation of national funds, EU funds are also considered as a good opportunity for projects that could be tapped by National</p>

		<p>see such measures and objectives transform into effectively implemented management plans.</p>	<p>Agencies/Authorities and NGOs to assist in the implementation of such measures.</p> <p>In this regard, Action 20.1 of Malta's National Biodiversity Strategy and Action Plan to 2030 also states that: Appropriate funding and resources for the implementation of the NBSAP and its ancillary plans and policies, is ensured through the mobilisation of resources from all sources, within the Government's consolidated fiscal plan.</p>
		<p><b>Our further comments on the specific sites are as follows:</b></p> <p><b>2. Il-Maqluba</b></p> <ul style="list-style-type: none"> <li>• Important tree sites such as il-Maqluba need more than just a Fire Management Plan to eliminate the risk of fire destroying this habitat. A buffer area preventing the letting of fireworks, lighting up of fires, bbqs, etc should be established within a distance of the site to minimise the risk completely. The current Trees and Woodland Protection Regulations and their amendments made this year are currently inadequate to give any peace of mind towards the proper protection of such sanctuaries from fire hazards.</li> </ul>	<p>The amendment to the Trees and Woodlands Protection Regulations (S.L. 549.123) on letting off fireworks near trees addresses practical challenges, especially in village squares with protected trees. The updated rule allows fireworks under specific conditions, such as wetting trees, providing additional fire trucks, and using firework-resistant materials. It remains illegal to set off fireworks within 20 metres of trees unless adequate safety measures are in place. The update aims to balance environmental protection with cultural traditions.</p> <p>The amendment to the Trees and Woodlands Protection Regulations (S.L. 549.123) carried out by virtue of LN 151 of 2024 with respect to the letting off of fireworks near protected trees, addresses practical challenges, especially in village squares. The updated Regulations find a balance between the environmental protection and cultural traditions, as long as adequate measures are put in place to safeguard protected trees. Such conditions may include, wetting trees, the provision of additional fire trucks, and the use of firework-resistant materials.</p>
		<p><b>3. Is-Simar (limiti ta' San Pawl il-Baħar)</b></p> <ul style="list-style-type: none"> <li>• Under the operational objectives of Simar there is mention of re-instating the adjacent fish farm to its original habitat. This will be probably unachievable because over the past 12 months the fish farm is back in operation (with plans for a new PA permit to refurbish</li> </ul>	<p>The inclusion of the operational objective has been re-evaluated. Whilst the aim of assessing the possibility of extending the coastal lagoon habitat is being retained, it is now not being limited to the specific area of the fish farm.</p>

		<p>the whole site) and for which ERA may have already been notified or consulted. Accordingly this operational objective is already possibly redundant.</p>	
		<ul style="list-style-type: none"> <li>Despite EU's nature restoration law and ERA's National Biodiversity and Action Plan to 2030 there is no mention of enlarging the wetland by restoring land adjacent to the existing wetland. ERA should be on the forefront to lobby for such restoration projects, especially in view of the fish-farming area no longer being aimed for such a restoration purpose.</li> </ul>	<p>Habitat restoration efforts for wetland habitats across the islands are ongoing, with expansions and improvements being made at various sites (e.g. is-Salini, il-Magħluq tal-Baħar ta' Marsaskala) and the introduction of a wetland habitat within Comino as well. While ERA is at the forefront of carrying out these restoration efforts, it is also important to consider the socio-economic aspects of respective sites.</p>
		<ul style="list-style-type: none"> <li>On the other hand, the Xemxija side to Simar keeps seeing the development of blocks of apartments with little to no resistance from ERA in the planning process. A buffer area needs to be established, as clearly policies that are limited to the delineation of the Natura 2000 site boundary are ineffective at achieving a favourable conservation status of this site with construction and habitation happening right next to it.</li> </ul>	<p>Relevant permitting and assessment processes are in place to safeguard the habitats and species for which a Natura 2000 site is designated.</p> <p>Regarding development, the Habitats Directive does not prohibit development in Natura 2000 sites. When a development proposal or activity falls within or affects a Natura 2000 site, a screening of the appropriate assessment is conducted in accordance with the Directive. This process determines whether the proposal will have an impact on the site. If insufficient information is available, ERA requests further studies, focussing on aspects such as light and noise impacts on species, to enable us to reach a well –informed conclusion.</p> <p>Meanwhile, one needs to also keep in mind that it is generally the case that the delineation of Natura 2000 sites is such that 'buffer' areas are already included within.</p>
		<ul style="list-style-type: none"> <li>In view of the fishfarm area being possibly no longer viable for restoration, and the building onslaught that is engulfing Simar on one side, the enlargement of the reserve should feature as an objective.</li> </ul>	<p>As per comment above.</p>
		<ul style="list-style-type: none"> <li>Simar is currently the victim of its own success in terms of the ever-increasing number of visitors which is now exceeding carrying capacity resulting in complaints of a poorer visitor experience. This</li> </ul>	<p>The site is managed through a management agreement between MEEC, ERA and BLM. Visitor management is one of the key actions, included in the annual work plan with key performance indicators that can be evaluated if</p>

	<p>too points to the need of extended the reserve's footprint resulting in added amenities for visitors.</p>	<p>deemed necessary. Furthermore, the Government has also launched a project which aims to rehabilitate the buffer zone of Simar Nature Reserve. This will further improve visitor management and experience within the site.</p>
	<ul style="list-style-type: none"> <li>Site specific regulations should be enacted to ensure protection of the site and a buffer area to it so as to effectively address a number of constant pressures the area is currently facing such as but not limited to: music and catering events outside the N2K boundary, insensitive construction just outside the N2K boundary, proliferation of cat colonies within and just outside the N2K boundary, etc.</li> </ul>	<p>Relevant permitting and assessment processes are in place to safeguard the habitats and species for which a Natura 2000 site is designated.</p>
	<p><b>4. Is-Salini</b></p> <ul style="list-style-type: none"> <li>Efforts should be made to control poaching activities on the perimeter of the reserve which is proving to be detrimental to the avifauna species, including potential breeding species. Such efforts could include the frequent presence of enforcement units in this problematic area to effectively curb illegalities which vary from use of electronic callers, hunting and trapping.</li> </ul>	<p>The concerns being mentioned are within the enforcement responsibilities of the Wild Birds Regulation Unit, which falls under the Ministry for Gozo and Planning. Matter will be referred accordingly to the relevant entity. Moreover, the site managers (Birdlife Malta), with the assistance of the Environmental Police Unit (EPU), follow cases of illegal capture of avifauna.</p>
	<ul style="list-style-type: none"> <li>This site includes the Kennedy grove park area where people tend to walk their dogs without a leash. This is detrimental to ground breeding birds with nests often destroyed as a result of this practice. Legislation needs to be enforced to cut down on this practice coupled with increased awareness on the detrimental effect of such an activity.</li> </ul>	<p>Comment has been duly noted and will be followed-up with relevant entities.</p>
	<ul style="list-style-type: none"> <li>The sukkursu canal should be included in the Management Agreement so that important species present are safeguarded, including <i>Aphanius faciatus</i>, <i>Anguilla anguilla</i> and several Annex 1 bird species that frequent it such as <i>Aythya nyroca</i> and <i>Ichthyaetus audouinii</i> that are potential breeders.</li> </ul>	<p>Comment has been duly noted and will be followed-up with relevant entities. However, to note that the canal is subject to ongoing site management.</p>
	<p><b>5. L-Inħawi tal-Għadira</b></p> <ul style="list-style-type: none"> <li>Under operational objectives the restoration of all the remnants of the sand dune, currently not part of the footprint under the</li> </ul>	<p>Comment has been duly noted and will be followed-up with relevant entities. However, to note that the sand dune area is subject to ongoing site</p>

		<p>management of BirdLife Malta, should be included. The first part would be to ensure this land forms part of the management agreement footprint, following which BirdLife Malta will obtain the necessary funding to handle restoration.</p>	<p>management, while conservation measures are included in the policy document. In this regard, operational objectives are not required.</p>
		<ul style="list-style-type: none"> <li>• Efforts should be made to address the situation of the illegal buildings which have sprouted around the wetland over the past decade. Most have enforcement notices but no further action has ever been forthcoming. These buildings have resulted in increased traffic to the area, resulting in more light and noise pollution negatively effecting directly the avifauna of the reserve.</li> </ul>	<p>Enforcement on any illegal buildings and/or structures falls within the remit of the Planning Authority not the ERA per se. ERA regularly liaises with the PA upon noticing any illegal buildings and directly investigates cases involving unauthorised interventions having detrimental environmental impact in protected areas.</p>
		<ul style="list-style-type: none"> <li>• Site specific regulations should be enacted to ensure protection of the site.</li> </ul>	<p>Comment has been duly noted. However, to note that once the policy document is finalised and adopted, this is to be considered as a binding document as per the Environment Protection Act (Cap. 549) as well as its subsidiary legislation including the Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44). Furthermore, relevant permitting and assessment processes are also in place to safeguard the habitat and species for which a Natura 2000 site is designated.</p>
		<p><b>6. Filfla u l-Gzejjer ta' Madwarha</b></p> <ul style="list-style-type: none"> <li>• Include and enforce the 1nm exclusion zone around Filfla adding that no navigation by any vessel should be allowed within 200m of the islet, except permits for research on the islet or within the 200m zone. Patrolling of the area should be regular and satellite monitoring of vessels should be considered.</li> </ul>	<p>Comment has been duly noted.</p> <p>With regard to access to the site and surrounding marine area, legal provisions are in place through Cap. 323, G.N. 173 of 1990 and Notice to Mariners No 44 of 2020 and ERA's relevant permitting procedures. The legal restrictions within 1 nautical mile around Filfla are jointly enforced by ERA and Transport Malta. It is important to note that it is not illegal for boats to go to Filfla; it is illegal if someone goes without the necessary permit. Fishing boats can still pass but cannot stop near Filfla.</p> <p>It is also to be kept in mind that this consultation process is linked to the terrestrial environment.</p>
		<ul style="list-style-type: none"> <li>• Even for permitted vessels on educational trips, all vessels capable of holding more than 20 passengers should maintain 750m distance and carrying out strict biosecurity measures before departure to</li> </ul>	<p>Comment has been duly noted and will be followed-up as relevant.</p>

		<p>reduce risks of rodent intrusion on the rat-free islet. These should include:</p> <ul style="list-style-type: none"> <li>○ In at least the week prior to the scheduled departure deploy and maintain rat prevention &amp; detection tools on board. These should include:</li> <li>○ Rope guards on all mooring or anchor lines</li> <li>○ 1x Non-toxic chocolate wax-block inside a closed bait station</li> <li>○ 1x GoodNature E2 trap</li> </ul>	
		<ul style="list-style-type: none"> <li>• Given Filfa’s significance for the Mediterranean population of <i>Hydrobates pelagicus melitensis</i>, any ex-situ threats to this seabird originating beyond Filfa and its islets but within Malta’s marine waters, should be investigated, including potential interactions with fish farms<sup>1</sup>.</li> </ul> <p>1 Borg, J.J. 2012. Tuna farms - a seasonal supplementary food source for storm petrels <i>Hydrobates pelagicus melitensis</i>. <i>Avocetta</i> 36: 91–94</p>	<p>Comment has been duly noted. Pressures on seabirds are addressed through ‘observations of pressures’ as part of the marine monitoring programme on seabirds (developed pursuant to the MSFD but considering the requirements of the Nature Directives) and on a case-by-case basis through environmental assessment procedures.</p>
		<p><b>7. Il-Gżejjer ta’ San Pawl (Selmunett)</b></p> <ul style="list-style-type: none"> <li>• <i>P. yelkouan</i> should be included in the conservation measures for this Natura 2000 site and the relevant SDF for this N2K site should be updated as per ERA's commitment to include this species prior to the completion of the LIFE PanPuffinus project (support letter included as Annex 1 for reference). Ultimately, this site should be granted additional protection as a Special Protection Area with respective conservation measures addressing this species, as proposed by BirdLife Malta under the Birds Directive. The islet supports a recently established colony of up to 70 pairs, which would benefit from enhanced protection. Any failure to include this species in the management plan will be detrimental to the achievement of a favourable conservation status of the species at a local and national scale, and would possibly be even a breach of the Birds Directive.</li> </ul>	<p>Reference is not being made to the presence of the Yelkouan shearwater within the site since Selmunett is currently not designated as a Special Protection Area under the EU Birds Directive.</p>
		<ul style="list-style-type: none"> <li>• ERA and AM should enforce the regulation of no food on the islet. It should be mandatory for ferry operators to inform visiting tourists of such regulations prior disembarkment.</li> </ul>	<p>ERAs enforcement officers patrol various Marine Protected Areas (MPAs) using ERA’s rhib The marine waters surrounding Selmunett falls within a MA. Selmunett itself is also frequently inspected by ERA’s compliance and enforcement officers to determine whether any legislative breaches are</p>

			noted and engages with visitors to educate them about good practices that need to be adopted to encourage responsible behaviour.
		<ul style="list-style-type: none"> <li>One of the conservation measures for Selmunett should be to limit visitor pressure from tourist ferries by establishing a daily visitor cap. Selmunett has experienced an increase in ferry stops for tourists, which raises concerns about its conservation. According to G.N. 1378 of 2016, "ERA shall be authorised to establish daily limits on the number of visitors granted an entry permit." Furthermore, "no group larger than 10 persons shall set foot on the islets at any one time, unless specifically permitted by ERA following an assessment of the potential impact of the activity on the site's conservation objectives." These regulations should be strictly enforced by ERA and AM.</li> </ul>	As per comment above.
		<ul style="list-style-type: none"> <li>ERA and AM should also assist tourist ferries to have biosecurity on board so as to reduce the risk of introducing more rodents on Selmunett.</li> </ul>	Comment has been duly noted and will be followed-up accordingly with relevant authorities.
		<ul style="list-style-type: none"> <li>The increase of Feral pigeons and potential impact on other fauna and flora should be monitored.</li> </ul>	Comment has been duly noted and will be followed-up accordingly with relevant entities.
		<ul style="list-style-type: none"> <li>The St Paul statue should not be lit up for any period of the night during the time of year when shearwaters visit the colony on the islet, this being October to July.</li> </ul>	Comment has been duly noted and will be followed-up accordingly with relevant authority.
		<ul style="list-style-type: none"> <li>The effect of light pollution from bunkering ships in front of the colony is a concern and must be mitigated for. In a recent study conducted at the Majjistral Yelkouan shearwater colony, direct illumination from ships increased cliff face brightness, and colony attendance was significantly reduced in brighter conditions<sup>2</sup>. 2 Austad, M., Oppel, S., Crymble, J., Greetham, H. R., Sahin, D., Lago, P., ... &amp; Quillfeldt, P. (2023). The effects of temporally distinct light pollution from ships on nocturnal colony attendance in a threatened seabird. <i>Journal of Ornithology</i>, 164(3), 527-536.</li> </ul>	An operational objective and a conservation measure for seabirds was included in the site-specific conservation objectives and measures for the Marine Protected Area (MT0000112) which is found in the vicinity of the Majjistral breeding site which aim to reduce disturbance from light pollution and other anthropogenic activities (Refer to 00_SB_3 in the document) and to regulate activities that may cause disturbance to seabirds (Refer to CM_SB_1 in the document).
		<b>8. L-Inħawi tar-Ramla u tal-Irdum tal-Madonna</b>	Regarding light pollution aspects, ERA is in the process of issuing guidelines promoting measures aimed at reducing and abating light pollution from

		<ul style="list-style-type: none"> <li>The issue of general sky glow must be addressed, along with specific point sources of light pollution, particularly from coastal resorts and clubs. Mitigation efforts should extend beyond the Natura 2000 site to include areas outside its boundaries, such as the Ċirkewwa ferry terminal and other locations where increased development and the use of powerful lights directed towards the sea impact the Rdum tal-Madonna cliffs. These areas include Armier, Mellieħa, Buġibba, Baħar iċ-Ċagħaq, and even Sliema. Increased cliff brightness from ships within the bunkering area is of concern and should be addressed as well.</li> </ul>	<p>various sources. These will provide a benchmark for both ERA officials and the general public against which existing and future lighting sources would need to abide by.</p>
		<ul style="list-style-type: none"> <li>Cliff-top fishing poses a threat to shearwater colonies during the breeding season, as unattended fishing lines can lead to entanglement when shearwaters are present at the cliff faces. The management of cliff-top fishing should therefore be included as a conservation measure for this site.</li> </ul>	<p>Comment has been duly noted and will be discussed with the relevant competent entity.</p>

Comments submitted during stakeholder consultation meeting on 12/11/2024			
1	Gayle Murphy Global Green Events 12/11/2024	<p>I have a question regarding the incredible diversity of medicinal and edible plants here in the Maltese Islands - is there some protective and conservation measures focussed on these species? As many of their ecosystems and habitats are being destroyed by development.</p> <p>Thank you to everyone working on these great conservation efforts. May we continue to see an abundance of and a thriving group of Natura sites across the islands, to preserve the local ecosystems and species.</p>	<p>With regard to issues related to medicinal plants, it is important to clarify that this public consultation focusses on the Natura 2000 conservation objectives and measures. These measures are specifically designed to address the habitats and species for which these sites are designated. While they do not directly target edible or medicinal plants, habitat restoration and management efforts will inherently benefit these aspects as well.</p> <p>ERA, in collaboration with the Plant Protection Directorate, is working on initiatives aimed at consolidating populations of various species. ERA recognises the value of these species and intends to promote their use. By highlighting their importance, ERA hopes to increase public awareness of the benefits of edible and medicinal plants. We are fortunate to witness a revival of traditional practices, with many plants making a return to our local cuisine.</p>
2	Dr Joe Doublet 12/11/2024	<p>My main concern with regards to what you've said is that you're leaving out a very important issue with regards to these objectives. There are a number of sites which are all at sea level, including a number of reserves, etcetera, and all these are bound to be significantly affected by sea level rise and I haven't seen anything concerning how one is going to address sea level rise which will definitely affect all these sites. You mentioned Simar, you've mentioned Ghadira, you've mentioned Salina, you've mentioned Ghadira s-Safra, and you've mentioned Maghluq. Sea level rise is going to happen. It seems that from what I've seen today, this is not being considered in any of your objectives and I believe it should be addressed now, not when things happen in a few years' time. I think it is something which is with us and we have to address it before it happens, or rather before it affects all these sites</p>	<p>Aspects related to climate change, aside from sea level rise noting that there is a whole debate whether Malta will experience sea level rise or otherwise, drought and coastal zone remodelling are generic aspects which will be covered by the general conservation objectives and related measures since they apply throughout all Natura 2000 sites. A consultation for the public to provide their feedback on these will be open in due time. The approach to kick-start the revision process by focussing on site-specific objectives and measures was to ensure thorough consultation with all stakeholders for each site, allowing ERA to determine which actions might need to be transitioned from the site-specific to the generic or vice-versa. In relation to issues about climate change, rather than simply sea level rise because there is a whole debate whether there will be sea level rise or otherwise, there</p>

		<p>in a significant manner because when it will happen, there will be no way it can be reversed back. It will be just a collective measure and it will affect significantly all these sites and it will be too late and I think as an authority, you should be proactive and try and look at ways and means how this can be addressed before it happens, not after it happens.</p> <p>Secondly, I have noticed that with regards, for example, domestic wild fowl at Salina, the terminology used is manage domestic wild fowl. I think you should be a little bit more blunt. I think it should be eradicate domestic wildfowl because obviously it has an impact on an important site.</p>	<p>will be definitely issues linked with drought and coastal zone remodelling. Meanwhile, some actions have already been taken in a number of coastal areas where works are actively ongoing.</p> <p>It is to be noted that this is an update to the existing management plans which now includes the formulation of specific indicators and how these will be measured.</p> <p>ERA is aware of the significance of climate change measures and is committed to ensuring that the measures are climate-proof. A notable example is the Ballut of Marsaxlokk, where the primary issue pertains to coastal erosion. This site t could serve as a pilot project for similar wetland areas, whereby artificial construction is used to protect the area.</p> <p>Furthermore, our efforts to augment species populations and expand habitat areas are aimed at enhancing the resilience of these habitats and species against the impacts of climate change.</p>
3	<p>Cynthia Caruana EkoSkola Malta 12/11/2024</p>	<p>Besides the rising sea level, is drought also being considered for the conservation of these sites? Thanks.</p> <p>I fully support a strong educational campaign on conservation of these sites to all citizens including children, youths and adults. Conservation will be easier then...</p>	<p>Issues relating to climate change and drought are some of the aspects, which are generic and will therefore be covered by the generic conservation objectives and conservation measures since they apply throughout all. We opted to go along this route because we wanted to seek the consultation on everyone on the site. Then we can consider which actions might merit removal from the generic aspect and included in the site specific or vice versa. Rest assured, for instance, that in relation to issues about climate change, rather than simply sea level rise because there is a whole debate whether there will be sea level rise or otherwise, there will be definitely issues linked with drought and coastal zone remodelling. In that respect, some actions have already been taken in a number of coastal areas where works are actively ongoing. Let's keep in mind that this is an update to the existing management plans and formulating them in a different manner, whereby we are also now including very specific indicators and how these will be measured. With regards to climate change measures, we are very much aware of this. In fact, the aim is to have climate proofing of these measures. One special case is the Il-Ballut ta' Marsaxlokk. There the issue is not directly linked to climate change, but it's also an issue of</p>

			coastal erosion and it could be used as a pilot project for similar areas, similar wetland habitats whereby artificial construction is used to protect the area. Also, the fact that we are trying to increase the populations of species and extend the habitats of areas, this is one type of increasing the resilience of these habitats and species in case of the way that climate change might affect these habitats and species.
4	Elena Portelli AIS Environment 12/11/2024	We have been involved in surveying some of the sites from another perspective, from the Water Framework Directive and I was just wondering about the source of some of the mapping that I've seen because it's not directly coincident to what we've submitted through this other process. So that was my one of my questions. So we were involved in the transitional waters of Ghadira, Simar, Maghluq and Ballut that I've seen and I think also Salina yes. It was in the list and that's one and also for those and I guess a general question is how you decided on the site boundaries and because again for transitional waters, site boundaries were particularly different and there seem to be areas where it's maybe based on contours maybe based on the land use and I was just curious to see how the decision was made. That's all for me.	In terms of data integration, Ms. Portelli from AIS correctly referred to the surveys conducted in relation to the Water Framework Directive. ERA has utilised both the surveys of AIS and the surveys that were carried through assessments done by a team of scientists both from ERA or that have been commissioned. In this case, the maps presented in the policy document are the latest maps based on the most recent data available. It is important to note that these maps are subject to change, particularly in relation to water bodies which are in some cases also seasonal. With regards to habitat mapping, ERA is taking into consideration all the present and historical habitat mapping for these areas. Furthermore, ERA is conducting field surveys to verify how these habitats and their areas are present on site.
5	Vanessa Macdonald Din I-Art Helwa 12/11/2024	I was fascinated by your talk about Selmunett and Saint Paul. You mentioned light and noise pollution a great deal, but one of the biggest problems that we have is these party boats that go and stay straight right on the edge of Saint Paul's island. I wondered if you were going to do anything about those. Thank you.	In terms of issues mentioned related to boat parties at sea or fishing off Filfla, these are already addressed by the conservation objectives and conservation measures for the marine Natura 2000 sites. It is to be duly noted that the conservation objectives and conservation measures for marine protected areas have been adopted last year. In relation to certain activities involving noise and light, these are also regulated through the Notice to Mariners issued by Transport Malta. Any reports should be reported to either ERA or to Transport Malta for their investigation to ensure compliance with the relevant laws.
6	Neil Muscat Western Regional Council 12/11/2024	With regards to Filfla, we made a number of educational boat trips with the necessary permits and out of three trips, we encountered fishing boats in the vicinity of Filfla. We want to see about monitoring and enforcement of these sensitive sites through this conservation.	In terms of issues mentioned related to boat parties at sea or fishing off Filfla, these are already addressed by the conservation objectives and conservation measures for the marine Natura 2000 sites. It is to be duly noted that the conservation objectives and conservation measures for marine protected areas have been adopted last year. In relation to certain activities involving noise and light, these are also regulated through the Notice to Mariners issued by

			Transport Malta. Any reports should be reported to either ERA or to Transport Malta for their investigation to ensure compliance with the relevant laws.
7	Antoine Gatt 12/11/2024	<p>I have three points I would like to mention. One is when we have to make sure that that when interventions are carried out on site. That we consider manual labour rather than using heavy vehicles because it is not the first time that I see works in sensitive areas where Earth moving machines are used, you know, and making more damage or creating more damage to the site than if it were carried out manually. I know it takes more effort and more time but at least it is more I wouldn't imagine more effective.</p> <p>The other issue relates to cats. I know it's a sore subject, a sore issue, but I've seen in your presentation neuter/relocate. We all know I'm sure about the issue of cats and their impact on the natural environment. I think it is something that it has to be taken seriously and cats should be removed totally from our countryside, practically.</p>	<p>Interventions take place both manually and also with machinery, depending on the specific needs and circumstances. ERA has issued guidelines on habitat restoration and the control of invasive alien species. For some species, such as <i>Carpobrotus edulis</i>, manual eradication is effective. However, for other species, like <i>Pennisetum</i>, additional interventions, including cautious chemical treatments may be necessary. It is crucial that interventions are repetitive and followed up to ensure their effectiveness. With regard to the use of machinery, this is employed when there is a significant invasion that cannot be managed manually or when manual intervention poses safety risks. Typically, machinery is used in coastal zones or areas heavily invaded with plants such as <i>Agave</i>. The use of machinery is a temporary measure, followed by restoration efforts to ensure long-term habitat recovery.</p>
		<p>The last one is more of a question. Access to Saint Paul's Bay. In your presentation, you mentioned you know access should be limited to the cemented parts, but I think that is very difficult to enforce. I mean, what's keeping us from removing total access onto Saint Paul's Islands?</p>	<p>Path access to Selmunett has been designated since 1993. Our intention has never been to restrict public access to Selmunett. It is evident that more information is needed to inform the public about accessible and restricted areas on Selmunett. A series of talks have already been held and discussions are currently taking place to further enforce current laws.</p>
		<p>Speaking on Natura 2000 Sites, how is construction being tackled? For example, if a structure is built in a protected area causing negative impacts to the ecology of the surroundings. Not necessarily for fragmenting the present habitat only, but also for changes in micro-climate and silt run-off. The question is what impact construction has on Natura 2000 Sites. With regards to education, we already discussed on the issue of cats, ducks and chickens. I believe that people must be aware that these must be considered as feral and not wildlife. These management plans must work hand in hand with education. For example, as part of education in the 1990s, we had Xummiemu which made a good impression with the general public. So we see how effective the media is with regards to education. Are there any plans that education in relation to nature via the media is strongly present again?</p>	<p>With regards to the educational aspect, there have been discussions and the Xummiemu initiative has been revived. It is important to emphasise that since the 1990s till today, there have been significant changes, with social media now emerging as the most robust sector. While television remains important, it has its limitations. ERA has consistently maintained a presence in the media, both in positive and challenging contexts. ERA also has plans to enhance public understanding of the work being carried out by the Authority, as one of the biggest challenges is that the public does not fully comprehend our remit, given that not all activities are regulated by ERA.</p> <p>Regarding development aspects, these were not mentioned since they will be covered in the general provisions. Apart from this, the legislation which was first enacted in 2003 clearly specifies what can and cannot be done. The Habitats Directive does not prohibit development in Natura 2000 Sites. In that</p>

		Whereas this is not the 1990's, people are still the same. Having a robust education campaign will yield positive results. Whether its TV or some other social media it does not matter as long as we reach the target audience. From experience, education and law enforcement are key to protecting natural habitats.	context, the legislation is clear and requests screening, and in certain cases, appropriate assessments. When a development proposal or activity falls within or affects a Natura 2000 site, a screening of the appropriate assessment is conducted in accordance with the Directive. This process determines whether the proposal will have an impact on the site. If insufficient information is available, ERA requests further studies, focussing on aspects such as light and noise impacts on species, to enable us to reach a well – informed conclusion.
8	Nathan Gatt  G10T Environmental Group  12/11/2024	I believe in certain sites the impact of invasive species is not being given the utmost importance, for example, il-Maqluba and also certain sand dune sites. Regarding sand dunes sites I think one thing that we never hear in Malta is that we remove certain trees which were planted on the sand dunes. A number of studies indicate that when trees are planted in dunes, the flora found in the dune is deteriorated. In Ghadira, although work being carried out is correct, more work is needed to generate exposed sand. In Ramla tat-Torri, through surveys it became evident that most of the area is composed of ruderal species. Just wanted to see since outside of Malta they found that certain disturbances in the sand dune helped the flora on the sand dune and wonder if certain practices could be applied to Malta or not. For example a study is carried out to see if sand dune species proliferate after removing these ruderal species.	ERA acknowledges the positive outcomes observed, particularly at White Tower Bay, which also led to the regeneration of some species which were extinct from the site but had a viable seed bank. However, it is important to clarify that when discussing sand dunes, we are not solely referring to mobile sand. In the case of Ramla l-Hamra and Ir-Ramla tat-Torri, dune communities are present which are on semi-consolidated to fixed sands. In fact, these are fixed dunes and the mobility of the sand in these areas could potentially destroy these habitats. Therefore, a balanced approach is essential.  Several NGOs are exploring various methods for sand dune habitat restoration. Some of the actions have proven effective, and the intention is to replicate these efforts in other areas. Significant changes have been observed at Ramla tal-Mixquqa and at Ghadira, where the removal of alien species has allowed the re-emergence of other species that had not been recorded in these areas for a considerable time.
9	Adrian Agius  12/11/2024	With regards to the issue of light pollution, there is a lot written for the five sites, namely Ramla tat-Torri, Rdum tal-Madonna, Cittadella, Filfla, and Ghar Dalam but what measures are being taken on-site so that there is reduction of light pollution? When you go on-site you see that the majority of these sights are impacted by light pollution during the night. Also, there is a light bulb with the statue on Saint Paul's Islands which does not make sense being left on during the night when no-one goes at that time of the day. On Saint Paul's Islands, the Yelkouan shearwater has been recording since either 2013 or 2014 that it nests there but it is not included in the document of the Natura 2000 Sites, even though in the other sites it is being included. Other impacts which were already mentioned such as the boat parties and the light and	Path access to Selmunett has been designated since 1993. Our intention has never been to restrict public access to Selmunett. It is evident that more information is needed to inform the public about accessible and restricted areas on Selmunett. A series of talks have already been held and discussions are currently taking place to further enforce current laws.  With regard to the issue of the Yelkouan shearwater, it was not mentioned during the presentation since Selmunett, is not a Special Protection Area under the Birds Directive. It is important to note that not all areas in which a species is recorded has to be declared as a Natura 2000 site. There are certain criteria by which a certain site is declared as a Natura 2000 Site. In relation to the Yelkouan

		<p>noise pollution emanating from them and people going on Saint Paul's Islands which has been already mentioned and is a big problem. Access to these islands should be removed. We already lost a population of lizard from this site. Bat roosts were also mentioned, especially the one at Cittadella. It was mentioned that bat boxes will be installed. The protected species found there do not use these bat boxes. <i>Rhinolophus ferrumequinum</i> and <i>Myotis punicus</i> are species which live in tunnels. So there has to be restricted access to these tunnels and that the appropriate bat grills are installed. When works are carried out, scaffolding and other things should be removed not like what happened in Mdina during the restoration of the bastions, as a wintering roost of <i>Myotis Punicus</i> was already lost there. In Filfla there is the problem of bio-security. Are there any measures which stop boats from sailing that close to Filfla?</p>	<p>shearwater, its population is covered under the Birds Directive which is regulated by the WBRU and other sites which are protected. This does not mean that the management processes which will take place on Selmunett will not cater for the Yelkouan shearwater. In fact, a number of measures are taking this species into consideration. With regard to Cittadella, it is true that the bat boxes will not be used for <i>Rhinolophus</i> and <i>Myotis punicus</i>. However, it is in our interest that conservation efforts are undertaken for other bat species, such as; <i>Pipistrellus</i> which is also found in Malta and is a protected species.. With regard to Filfla, it is to be duly noted that there are legal restrictions within 1 nautical mile around Filfla which are jointly enforced by ERA and Transport Malta and in the event of illegal activities on Filfla, whoever is responsible is stopped. It is important to note that it is not illegal for boats to go to Filfla. It is illegal if someone goes without the necessary permit. Fishing boats can still pass but cannot stop near Filfla.</p>
		<p>With regards to the mentioned sites which are near to the sea, for example I-Ghadira s-Safra and Ballut ta' Marsaxlokk, if we are to propagate ex situ plants such as <i>Cressa cretica</i>, is something being done such as micropropagation? It is already being mentioned that in the future there should be an impact due to climate change. In addition, for example in sites where trees are being planted, such as I-Ghadira s-Safra, are these trees from local stock or imported? In fact, I believe the Tamarisk was not the indigenous local species which was planted in this site. In other reforestation areas in Natura 2000 Sites, when planting not only trees, are these trees from local stock or imported?</p>	<p>With regard to the issues mentioned for I-Ghadira s-Safra and Il-Ballut ta' Marsaxlokk and how species management is taking place, a number of plants being used for the restoration projects are being grown locally in Malta from local stock. It is to be noted that after an absence of thirty years, ERA managed to regenerate certain species and re-introduced them in certain sites. In fact, the <i>Ammophila</i> was brought back to Malta and was successfully re-introduced in Ramla tal-Mixquqa through ERA personnel. With regard to ex-situ conservation, ERA is making efforts together with other entities that grow plants in their own nurseries, such as Ambjent Malta. The latter has their own nurseries, which were extended from one to two in the last year and are fully operational in two different locations. Over 80 different indigenous and/or endemic plant species are propagated by Ambjent Malta. They are also responsible for seed collection, through permits issued by ERA, and also inform ERA about the location from where the seeds were collected and any other relevant information. After they grow, these plants are used in Natura 2000 Sites. When Ambjent Malta implements environmental restoration works in Natura 2000 sites, a local stock is generally utilised. In certain exceptions, this is not done when a certain species has to be re-introduced in a particular habitat in which it became extinct. In this case, discussions are held with ERA and these are usually imported, mainly from Sicily. In these last two years, there was an agreement with Argotti who grew plants in their botanical gardens on our</p>

			<p>behalf and once grown up, ERA utilised them to re-enforce Natura 2000 sites. This agreement was extended for another two years. In addition, ERA is also in collaboration with the Plant Protection Directorate who through their laboratories carry out micro-propagation of certain species.</p>
		<p>Another issue currently present are the chickens, apart from the already mentioned cats and water fowl, which are also ending up in areas such as Maqluba which is not necessarily accessible. Is something being done to counteract this issue? It is also being mentioned that tree species from local stock are being planted but are these being planted in the same site, even if they are already present, or in other different sites? For example, species at Ramla tat-Torri might already be present and stock to be planted is brought for example from Ramla in Gozo. Is this done or planting takes places from stock in the same site?</p>	<p>With regard to the mentioned issue on chickens and other animals in Maqluba, it could be the case that chickens might fall from the farms in the upper part. In fact, the mayor of Qrendi confirmed that there is no intention that chickens are placed in Maqluba and at the moment, no chickens can be found at Maqluba and the current problem is the presence of pigeons.. Our policy is the control of the species and this does not mean that if we experience this scenario, we will kill those animals.</p>
		<p>In Pembroke, there will be 2 huge development projects and this will result in a spill over effect on the site for sure. This might also impact its micro-climate. What will be done so that this does not happen? Also, if you have a person who works there on a part-time basis. This is clearly not enough especially for sites such as Pembroke and Ahrax tal-Madonna. There should be at least a person who works there on a full-time basis so that the site is managed and ideally rangers or people who will monitor all the time or at least during peak hours. For example, Ahrax tal-Madonna during time of camping so as to have someone monitoring and enforcing such as on trampling.</p> <p>There is a need for employees who manage sites to have good and competitive wages and for their health to be taken care of including mental health to avoid burn out and injuries at work.</p>	<p>Amongst impacts at Natura 2000 sites, the issue of trampling is going to definitely be addressed in the general provisions because it's a common factor that is linked to disturbance in most of Natura 2000 sites. However, it should be made clear that ERA is not restricting the public from visiting Natura 2000 sites. The mechanism has to be a combination of education, signposting and clear indications, with the aim that the public understands where they can go and where they cannot. Some of these actions are already being addressed.</p>
10	<p>James Gabarretta Nature Trust FEE Malta 12/11/2024</p>	<p>A small thought on the wetland sites of Ballut in Marsaxlokk and Maghluq in Marsaskala in the South. One of the main issues is their size. There are not so much opportunities in the future to consider expanding their size, if not now. In my opinion, there should be an effort to investigate the possibility of expanding these sites. Even a report indicating that there was an exercise to indicate importance of this possibility and this is a big challenge. On these two sites mentioned, there should be a more robust intervention approach, especially for Maghluq in Marsaskala were there is an issue of circulation</p>	<p>The expansion of the habitats in Il-Ballut ta' Marsaxlokk and Il-Maghluq ta' Marsaskala is one of the measures that is included in the site-specific conservation objectives and measures. In fact, when we stated that we aim to enforce the state and function of habitats and species of these sites, it is also referring to the expansion of these habitats since we need resilience of these natural habitats. The reinforcement of the killifish is also being taken into consideration but it is important to note that with regard to its reintroduction into Il-Ballut ta' Marsaxlokk, before the habitat is considered capable of catering for the killifish, we are not in a position to do so. Engineering works are</p>

		<p>which is currently being treated artificially. More passive approaches should be in place so as to reduce energy consumption. Even in Ballut ta Marsaxlokk, the re-introduction of the Mediterranean killifish was not mentioned which is very important for the recovery of this site. These two thoughts for me are critical because they are of utmost importance for both sites.</p>	<p>in the pipeline,so as to strengthen the Il-Ballut ta' Marsaxlokk and reduce the impact of erosion. After reducing the impact of erosion, then we will move on to the strengthening of the Il-Ballut ta' Marsaxlokk for its habitats and species, apart from making it adaptable for the reintroduction of the killifish.</p>
<p>11</p>	<p>Alfred Baldacchino  12/11/2024</p>	<p>First of all, this discussion is something positive where stakeholders meet and provide their insight to the Authority on problems which are more familiar to the Authority due to the interests and remits it covers. My first comment is on the invasive species. Like Dr. Doublet said, we cannot continue to accommodate the presence of domestic wild fowl. From a scientific and ecological perspective, these species do not have any positive contribution. In addition, just as Antoine Gatt stated, it is now time that Authority takes action on the presence of feral cats, not only in Natura 2000 Sites but also in certain other open areas. These should only be limited to households. In Poland, feral cats are being considered as invasive alien species. We know the negative impact these species put forward and in certain areas, they nearly eliminated reptile, bird and insect species. I also think that the expansion of habitats should be done very cautiously. If we had to increase the number of <i>Tetraclinis articulata</i> in Maqluba, what impacts on the ecosystem of the area would they pose with respect to coverage and shade? One does not simply say that an expansion of a habitat is made. One has to see what ecological impact on the concerned area prior to doing so. Certain species which are found in Natura 2000 Sites and are becoming rarer, these should be aided to re-establish themselves again. As also mentioned by Antoine Gatt, with regards to the use of machinery. I understand that in certain cases such as when removing big invasive plants, the interventions have to be done with machinery. However, we also saw machinery which damaged valleys and not only removed what was to be removed. Valleys must be restored and not cleaned. One has to give proper attention when there has to be the use of machinery in certain sites, especially in Natura 2000 Sites, and supervision takes place so as not to make unnecessary damage to other species. If not mistaken, these measures are all mentioned in the management plans which were established for the Natura 2000 Sites and these include certain obligations and measures to carry out good management. I believe these measures are cast in stone when taking into account these management</p>	<p>With regard to the issues of invasive alien species, one can acknowledge that this is challenging. This is because while some of these species are easily eradicated, others prove to be more difficult to eradicate. There are also other issues, such as complaints from the general public once interventions are carried out on an invasive tree species such as an <i>Acacia</i>. In reality, Malta and the European Union have an obligation to eradicate <i>Acacia</i>. Thus the removal of alien species needs to be done with caution. Even though the <i>Acacia</i> poses harm to certain habitats such as the garrigue, these are still home to certain birds and reptiles. In light of this, every intervention on the removal of invasive alien species has to be done in a logical, scientific and structured way and ERA proceeds in this manner. With regard to the comment on paying attention regarding the expansion of habitat - yes, this is very important and in fact one of the biggest challenges for the policy makers is that in certain sites there might be two important habitats that are occupying the same site. A pragmatic example is Pembroke, which is home to a type of garrigue and type of grassland which both occupy the same area. There comes the question of which habitat should one preserve. There are cases when both habitats are preserved and there is where a balance should be made. However, there are other cases for example where trees are planted in places that is not allowed. It is important how these interventions are implemented and the general public must be aware why these interventions are taking place. This is being mentioned due to the issue raised on cats and ducks. ERA effected interventions to remove ducks and managed to remove them from two sites. The problem is that these are re-introduced back after being removed. As a result, environmental education is needed. In fact, in a particular instance, ERA ended up on the news after removing ducks from a certain site. This was in a negative sense as it was interpreted as doing something wrong. It is important to note that every time an intervention is effected involving such animals, this is done in collaboration with the commissioner for animal welfare so as not to lead to any harm and respect all aspects. With regard to the comment on measures being cast in</p>

		plans which were made earlier. To arrange the situation, one must add on them and not reduce their value, impact and effect.	stone, these are being discussed and are not yet fixed. These are still proposed and the reason of this public consultation is to put forward these measures. Once these are adopted and publicised, one can say they are cast in stone and are to be abided with.
		It be can concluded how essential these measures are via this meeting as stakeholders were taught certain things. For example, today I learnt that these species in Natura 2000 Sites which are being helped to regenerate are being carried out via local stock. On the other hand, ERA also gathered some insight which might have been missing, thanks to the input from the stakeholders who took part in this meeting, for example of the presence of cats, chicken and ducks in certain sites. These meetings help as not only stakeholders are put into a position to offer their insight and educate themselves, but also ERA can benefit from such meetings. I agree for example with the case of the Acacia. Even though it is invasive, we cannot just decide to eradicate and forget the other benefits it provides as mentioned earlier. In this regard, ERA must educate the general public more on this and other issues such as the introduction of certain species in certain sites for example chicken in a certain site with the idea that it is a contribution to such site when in fact it is the other way round. Meetings like this will give a direction to stakeholders on the position that ERA is taking on the particular subject while taking in comments in return. The gist of today's meeting indicates that this process will not eliminate the previous measures but continue building upon the management plans which were made in 2016.	With regard to regular meetings with the stakeholders, we will be having at least three other public consultations on the measures of the management plans. It would be great to have everyone so that further comments are discussed, even after measures are adopted. This is the first time that the Natura 2000 management plans are being revised. All ERA policies are revised from time-to-time and are complimentary to the previous ones. For example, the Marine Monitoring Programme has already been revised to see what was carried out correctly, what was not accomplished and what can be done better.
12	Sacha Dunlop AIS Environment 12/11/2024	With regards to certain objectives and targets in relation to improvement on coverage of certain species and habitats, for example that a habitat needs to expand by a certain amount or cover of certain species needs to expand by a certain amount. How will the Authority or the responsible party contribute to this improvement? and how will this be monitored? And monitored regularly, once a year, twice a year? It is important to highlight that not all sites are monitored and managed with the same frequency, attention and intensity. For example, in a certain sites you might notice a higher presence of site managers or wardens than in other sites which might be more neglected. What is ERA's plan in this regard so that objectives of every site are tackled and in the case of someone doing damage, accidentally or not, there will be the presence of officials to stop any wrongdoings and reported accordingly?	First of all, it is important to make a distinction between a regulator and an implementer. ERA in itself is the regulator and then there are the implementers. However, sometimes ERA acts as an implementer itself with the resources it has or when there is a lack of implementers. With regard to the comment on sites not all managed the same, currently there are discussions taking place with Ambient Malta which is one of the implementers that takes care of Natura 2000 sites around Malta. We are also currently in discussions with representatives for the Ministry for Gozo who administer certain sites in Gozo through Eco-Gozo. There are also other entities, such as EWA and Project Green, who administer other sites. This indicates that all sites have an implementer, while ERA is the regulator. Being a regulator, ERA requests that any interventions are made with the necessary permits and permit conditions. In certain

			<p>interventions, a method statement is also required. There might be cases where after the screening process, ERA allows the use of certain machinery since it agrees that the damage following the interventions will not be medium to long term. In that case, ERA either monitors the intervention or the permit will include a condition that there should be a monitor on-site who will report on the proceedings. When interventions are observed, the best mechanism is to inform ERA, either via phone or via ERIS, and if preferred also anonymously. The problem from an enforcement perspective even within Natura 2000 sites is when something is posted on social media after the intervention took place. When ERA officers arrive on-site and there is no one, an investigation has to initiate. This takes time and may also include the involvement of third entities, such as the police, and this does not guarantee that it will prove successful. It is easier to inform ERA during the interventions, so that ERA officers go on-site during and not after the interventions.</p>
13	<p>Annick Bonello Cassar</p> <p>Nature Trust Malta</p> <p>12/11/2024</p>	<p>Regarding sites: consider please full time site managers for sites - these sites must be given full importance. Having Pembroke with a part timer is not enough for the demands and challenges this site has.</p> <p>Strong educational campaigns must be done by ERA in a sensitive way together with cooperation with other entities – example: Why are food vouchers being given for cats - when neutering should be given more importance?</p> <p>Site protection must be acknowledged through appropriate pay. We must be proud of our natural heritage and celebrate this through proper dedicated full time management.</p>	<p>ERA assists and participates in various educational initiatives. In terms of tertiary education, ERA makes interventions in courses at both MCAST and the University, and several theses are carried out in collaboration with the ERA. ERA works with the University in terms of 'citizen engagement' and 'citizen science'. However, we agree that there is more work that can be done in this regard.</p>
14	<p>Adrian Mallia</p> <p>ADI Associates</p> <p>12/11/2024</p>	<p>First of all, many thanks for this public consultation and I believe these should be done frequently. I represent ADI Associates and we were involved in the preparation of the first set of management plans for MEPA. I see a lot of similarity with what was presented but I also see a number of things which are missing in what is being proposed today. One might say that we will get a clearer picture once the general objectives are laid and also as a result of this public consultation. When coming to this natural step of reviewing such plans, was there a process were the 2016 management plans which were approved and cast in stone to be reviewed and not sort of starting all over again from the beginning? This review indicates what went well, what went wrong, what</p>	<p>One of the issues is that very often it's not just trampling on foot that is the issue, but also by vehicles illegally driven onto natural habitats. In that case, for instance, one of the mechanisms adopted are either bollards or else in some cases, boulders. We have examples where these things worked and where they did not. We had bollards installed at Mistra and within less than 24 hours they were stolen. On the other hand, in some other areas we installed boulders and it is actually an effective deterrent because we've seen considerable improvements, particularly in selected sites.</p>

	<p>worked, what did not work and what needs to be addressed. Did ERA carry out an analysis exercise of the management plans, conservation objectives, operational objectives and any other measures which are already present in all approved management plans to see which worked and which did not, were are the problems, what was successful, what was unsuccessful? The impression I got from this public consultation is that we are starting from scratch. I want to see that an analytical exercise is carried out, in fact, as a result of a one year consultation with the relevant stakeholders, it was suggested that the management plans are produced and a lot of NGOs contributed.</p>	<p>ERA thanked Adrian Mallia and ADI because as he mentioned, the Management Plans and Conservation Orders that were adopted in 2016 and that are currently in force were developed through an ERDF project in collaboration with ADI. Those management plans are still there and the process of revision is a natural project essentially stated by law and required also by the EU Habitats Directive. In some cases, the measures were encapsulated and aggregated particularly when the issues were generic. If you see the management plans which were developed and approved in 2016, we had a number of repetitions in all the management plans. We had the same monitoring conditions, educational aspects and same issues on disturbance and trampling. So rather than having very lengthy documents, which the public would fail to understand, we opted for shorter versions with clear targets and extracting the generic parts into a single document. As stated at the beginning of the meeting, we did not start with the generic aspect because we would like to have the public's opinion on these issues. When it comes to the process, an assessment was done for these mentioned sites. The majority of the measures were either partially implemented or under discussion so that they are implemented. There have been instances where implementation of certain actions have been not carried out due to either logistical reasons and/or lack of resources or other issues. Through this experience, together with the implementers on the ground, we made an assessment of the measures which need to be addressed with a priority, as sometimes the list of measures is long and unrealistic. The priority was to address pressures and threats which are the most crucial, and we know that there is commitment and resources so that these are implemented. With regard to feedback from the public, sometimes we have this wish list in which we add measures and end up criticised on why these were not implemented. Here we are only seeing a small amount from all the areas which need to be managed. It should be also noted that apart from the Natura 2000 sites, there are other sites which are not designated and which might have environmental problems that still need to be resolved. Through this exercise, ERA is taking into consideration the resources available in Malta and the timeframes. This does not mean that measures which were not listed will not be addressed as well. There are also some measures which will be included in the general document so that there will be no repetition and that the</p>
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			measures will be more tangible and direct on the sites. With regard to what we have for cases like L-Ghadira s-Safra, this does not mean that these measures are enough and we will stop there. There are various tools on how these sites are managed. At L-Ghadira s-Safra a Protection Notice was issued to regulate activities which take place on site. These will continue to support existent measures or serve to be more restrictive in certain cases.
15	Dr Eman Calleja 12/11/2024	We spoke a lot on the protection of these sites and the management objectives there are being done. Through my experience on the management of these protected areas in the past 30 years in Malta, in order to be successful you must have a good manager. Nowadays, a manager of a protected site who knows what is to be done and wants to do it, is very rare to find. In fact, there is a high rotation and they spend a short period of time on a particular site, sometimes due to short work contracts which are to be extended on a yearly basis for example. There is no security of work which is deemed strong even though we depend on these people to protect these sites for us. When you do not have a structure for these people to work and protect such sites it is in vain to talk on the management of these sites. What is ERA doing to protect these people and offer more job security for them?	Even though ERA's role is as a regulator, this does not mean it does not address job security. In fact, in the sector of green jobs we have our proposals in the National Strategy for the Environment which are in the final stages of approvals. Green jobs are one of the aspects which Malta is promoting. The National Strategy for the Environment is Malta's not ERA's even though it has been drafted by ERA through a public consultation with support from the government. ERA is the regulator for all the Natura 2000 sites and there are entities which implement actions within these sites. In certain cases, ERA allocates funds to certain NGOs via contracts. One has to note that there are number of Natura 2000 sites which are directly managed by Ambjent Malta. In this regard, this means that a number of officers are employed on a full-time basis to take care of the day-to-day maintenance of such sites, apart from implementing ad-hoc projects to regenerate certain sites such as part of Il-Buskett, Is-Salini and Xrobb l-Għagin. There are other sites which are not directly managed by an entity, for which Ambjent Malta together with ERA carry out a plan to implement specific projects which are needed either on particular species or on part of a site. For example at Għajn Tuffieħa, 95% of the <i>Acacia</i> has been controlled in around two years. In sites managed by NGOs, Ambjent Malta also assists in projects in which the NGO might not have the necessary expertise or the resources needed to implement - for example the dredging at Il-Magħluq of Marsaskala, which works were carried out together with Nature Trust and ERA in order to improve the wetland area which supports the Mediterranean killifish.
16	Neil Muscat Western Regional Council	Even though the scope of this meeting was on policy, it is crucial to note that there is the need to put more focus also on monitoring and enforcement according to comments which were put forward during the discussion. A lot of things which affect the sites, not only Natura 2000 ones, are anthropogenic effects not only from construction and development but also from dumping.	ERA is fully willing to work with the regional councils. With regard to monitoring and enforcement, statistics indicate that a lot of work is carried out in relation to inspections on reports received. It helps to inform ERA right on time so as to take the necessary action.

	12/11/2024	From our end, we will try to push forward education and enforcement but we also need the authorities so that we assist each other.	
17	David Michael Schembri Qrendi Local Council 12/11/2024	We have to make a distinction if we want Maqluba to be visited or protected. Maqluba is a Natura 2000 Site, Special Area of Conservation, European Destination of Excellence and recently given the title 'Silk Road City' for its natural environment. With regards to the presence of water at Maqluba, we are facing problems and challenges due to construction and development. Until the 1970s, Maqluba was surrounded by fields. Nowadays, concrete and asphalt is serving as a channel for water to reach Maqluba. This is resulting in a deposit of sand. Are we going to protect it, restore it or leave it as a natural sink hole for water? Water is making a difference at Maqluba. Around 80 years ago, potatoes and onions were grown at the base of Maqluba. When the area was abandoned, Carob and Pomegranate trees proliferated. With the current water ending up in the base of Maqluba, these trees are also dying and ended up invaded with <i>Arundo donax</i> . This brought a challenge since this is also dying and ending up floating and is subject to fire incidents. It is good that a fire plan was mentioned but are we going to go inside Maqluba? Are the stairs going to be arranged? Are we going to deviate the water course so as not to degrade the Belvedere and the railings? In the 2016 management plans it was mentioned that there should be a site manager that communicates with the local council and MTA. I believe that apart from the communication, who is going to carry out the implementation? The local council, MTA, ERA? I would like to thank Ambjent Malta since the surrounding area was covered with plantations of endemic and indigenous tree species. In addition, display boards were also put in place to indicate the name of tree and some information on it. By this, we can use Maqluba as a pilot project since we found a right balance between culture, religion, nature, rural and the urban aspect.	With regard to the comments on Il-Maqluba, it is suggested that these are provided in writing so as to be followed by ERA.
18	Johann Gatt Nature Trust FEE Malta 12/11/2024	Thank you for mentioning education. We are committed to continue taking children to learn outdoors because a generation that has no knowledge about the environment has no guarantee that it will save it from behind a screen for generations to come.	Comment has been acknowledged and agreed to. ERA assists and participates in various educational initiatives. In terms of tertiary education, ERA makes interventions in courses at both MCAST and the University, and several theses are carried out in collaboration with the ERA. ERA works with the University in terms of 'citizen engagement' and 'citizen science'. ERA aims to continue its efforts in raising public awareness and education.