



Public Consultation Submissions & Responses

Establishment of the Majjistrat, Nature and History Park (Amendment) Regulations, 2025

March 2025

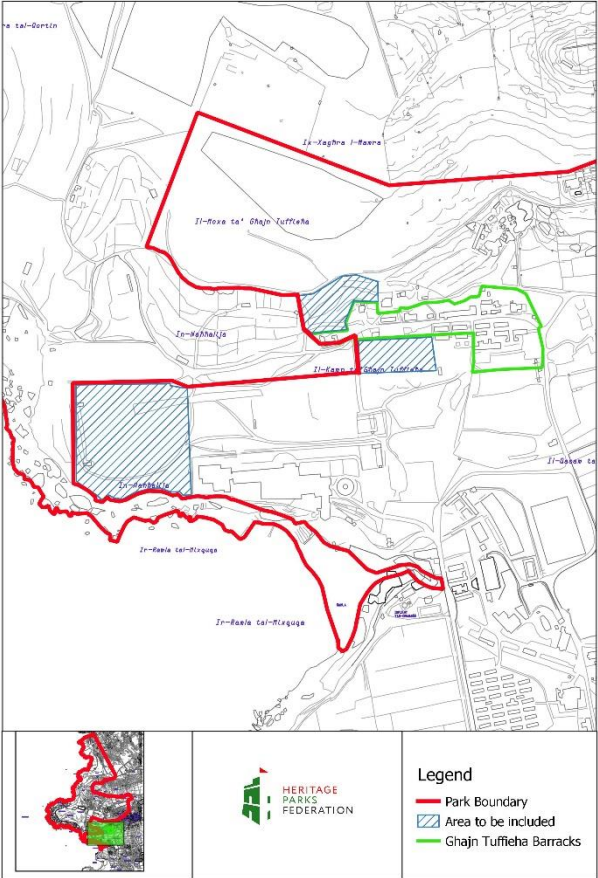
Environment & Resources Authority



CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Sammy Vella 16/10/2024	<p>4: 1,2 need to have the punctuation corrected in the following manner: It's just a matter of adjusting the commas.</p> <p>"The designation of the National Park aims to protect the ecological processes, as well as, the species, natural habitats, features and characteristics of the area and, in this regard, the competent authority may, from time to time, determine additional levels of protection within the Park, as may be required."</p> <p>Please note that the correct punctuation for Regulations 4 (1) and (2) need to be corrected as follows:</p> <p>(1) In line with the provisions of the Flora, Fauna and Natural Habitats Protection Regulations, the competent authority may issue a management plan. or plans, for the Park.</p> <p>(2) The competent authority, with the assistance of the Board, shall supervise the implementation of the management plan or plans, which shall be implemented by the managing organisations."</p>	Your suggestions have been noted and text will be amended where applicable.
2	Darren Saliba Heritage Parks Federation	The Heritage Parks Federation have taken note of the proposed amendments made to LN549.48 , Establishment of the Majjistral, Nature and History Park (Amendment) Regulations, 2024 with favor.	Suggestion is noted and will be discussed under a separate process as it is beyond the scope of the proposed Legal Notice which mainly focuses on administrative issues such as mentioning NGOs holding agreements for the management of the Park; clarifying the role of the Environment &

	12/11/2024	<p>Following discussion on the matter, the Heritage Parks Federation would like to bring to the Authorities attention areas in proximity of the Park that had not been included in the boundaries of the Park back in 2008 when the Park was being set-up. The areas being mentioned are:</p> <ol style="list-style-type: none"> 1) Parts of the shooting ranges bordering the Park, Radisson Hotel and the Scouts campsite; 2) The Għajn Tuffieħa Barracks. <p>In this regard the Heritage Parks Federation would like to suggest to the authority to consider including the aforementioned areas to the boundary of the park. Our request to include these areas to the Park boundary is meant to valorize and improve the status of these areas through management actions while maintaining their natural elements and integrity.</p>	<p>Resources Authority as the competent authority; and further alignment with the management plans for Natura 2000 sites in line with the Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44).</p>
--	------------	---	---

			
3	<p>Nicholas Barbara</p> <p>BirdLife Malta</p> <p>12/11/2024</p>	<p>As part of the public consultation process on the amendments of the Establishment of the Majjistral, Nature and History Park, BirdLife Malta would like to provide the below feedback:</p> <p>i. Amendment to Subregulation (1) of Regulation 8: The proposed amendment transfers the responsibility for issuing the management plan from the Board to the competent</p>	<p>Your comment has been noted and has been taken into consideration, whilst adhering to regulation 14 of S.L. 549.44.</p>

	<p>authority. While we acknowledge that the Act allows for “the active involvement of local communities and populations” in the management plan, we recommend that the active involvement of the Board itself is explicitly included in the Majjistrat Nature and History Park Regulations. The managing organisations, being also represented in the Board, shall bring essential experience and knowledge into identifying gaps that need to be addressed within the management plan, contributing significantly to the development of a robust plan.</p> <p>In addition, the amendments hints that the issuance of a management plan shall be at the discretion of the competent authority. It is an optional action as opposed to the mandated requirement specified in the current regulation. We believe this requirement should remain compulsory, particularly given the park’s significant protected areas under the Habitats Directive.</p> <p>ii. Deletion of Annex II of the principal regulations First and foremost, we would like to point out that the current regulations, as well as the proposed amendments, are ambiguous on the definition of ‘managing organisations’ sometimes also being referred to as non-governmental organisations (NGOs). With the proposed amendments, it is also not clear how many managing organisations will enter into agreements for the management of the park. Hence, we suggest that a clear definition of ‘managing organisations’ is included together with the maximum number of organisations that may be appointed.</p> <p>Furthermore, the proposed deletion of Annex II creates uncertainty regarding which ‘managing organisations’ (or NGOs) will hold management agreements for the park. Although the principal regulations state that the Minister or their representative may enter agreements with NGOs working in</p>	<p>There is a distinction between “managing organisations” and the “managing board” (i.e. the Majjistrat, Nature and History Park Management Board). The former are referred to in regulation 10, whilst the composition of the latter is in regulation 9. The previous Annex II specifically listed the non-governmental organisations empowered to be nominated for the Managing Board, however the proposed regulation 9(1)(c) now refers to “three members from non-governmental organisations holding agreements for the management of the Park”.</p> <p>The term ‘managing organisations’ links to the implementation of the management plans in line with regulation 15 of S.L. 549.44 which states that <i>“the competent authority may enter into a management agreement with every owner, lessee or occupier of land forming part of such areas for the management, conservation, restoration or protection of the site, or any part of it”</i>, and which is therefore not limited to NGOs. Within SL 549.48,</p>
--	---	--

	<p>heritage or environmental management, we are concerned that such agreements may be awarded to organisations lacking the requisite expertise for implementing the management plan or conservation measures. Thus, we recommend establishing stricter eligibility criteria for NGOs serving as managing organisations. For example, only NGOs with a minimum of three years' proven experience in environmental conservation and management should qualify for consideration. Additionally, the process for selecting managing organisations should involve public consultation to ensure transparency and community support.</p>	<p>the maximum number of organizations is not specified, as this approach offers greater flexibility in the management of the Park, allowing for the involvement of multiple organizations if deemed necessary for more effective site management.</p>
--	--	--