



# Public Consultation Submissions & Responses

## Intent and Objectives: Guidelines for Good Forestation Practices for the Maltese Islands

February 2022

Environment & Resources Authority



## CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Nicholas Barbara  BirdLife Malta  07/02/2022	<p>BirdLife Malta is welcoming ERA's initiative to issue the "Guidelines for Good Forestation Practices for the Maltese Islands" which we believe has a potential to not only greatly contribute to forestation initiatives and the increase of green areas in Malta, but also support Malta's efforts to mitigate climate change. BirdLife Malta has decades of experience in habitat restoration and forestation and we are glad to provide our feedback as follows.</p>	Contribution reviewed and welcomed.
		<p><b>Intent</b></p> <p>The intent of the document is defined as "to provide a quick guide in the form of practical pointers, recommendations and a checklist of general codes of good practice to enable a successful tree-planting initiative. The guidelines shall take into consideration the different stages of a tree-planting project; from concept, to design and to implementation phase". There is no need to say how important is the initial stage of assessment and identification of areas appropriate for forestation activities and unless it is meant under the "concept", we may recommend adding it to the wording. The stage of monitoring and evaluation is crucial in such projects (especially the ones tied to habitat restoration), therefore we suggest including it into the intent as well. Another point we would like to mention is the need to specify/list the aims of the forestation activities for which these guidelines are designed, such as:</p> <ul style="list-style-type: none"> <li>• recreation and public wellbeing;</li> <li>• habitat restoration and/or enhancement;</li> <li>• wood production.</li> </ul> <p>Depending on the aim of a forestation project the recommendations and guidelines will vary.</p>	<p>The Guidelines are intended to cover the whole process of forestation initiatives from planning to implementation; hence the site selection and assessment steps shall be included.</p> <p>The importance of monitoring for such projects is acknowledged.</p> <p>The Guidelines shall indicate relevant aims of forestation activities. Wood production is not being considered given the local context.</p>
		<p><b>Objectives</b></p>	Comments on the objectives are duly noted and shall be integrated in the Guidelines accordingly. The Guidelines

	<p>Under the European Green Deal as well as in line with the Paris Agreement, Malta has obligations to contribute to climate change mitigation. Land use, land use change and forestry ('LULUCF') sector has the potential to provide long-term climate benefits, therefore the objectives for these guidelines should include an idea to contribute to the achievement of Malta's greenhouse gas emissions reduction target.</p> <p>Although the proposed objectives are well defined, we would like to share some insights which could be of use while further refining them. First of all, it is important to build the guidelines on the scientific ecosystem-based approach using an acknowledged and feasible methodology. A holistic approach should be taken during the design phase which would allow the creation of a system of interconnected green spaces on the Maltese Islands. No need to mention that Environmental Impact Assessment should be conducted for any large-scale project or project that is likely to have an impact on sensitive areas/habitats/species.</p>	<p>are meant to assist various entities in developing and implementing a tree-planting project based on good arboricultural practices and in line with relevant obligations and legislation.</p> <p>ERA's role is to ensure that forestation projects are duly carried out with a holistic approach in mind. These Guidelines are just one of the policy tools intended to reach this aim.</p> <p>ERA will ensure that any projects that the Authority is made aware of are assessed accordingly.</p>
	<p>The objectives should also include establishing a methodology for assessment of the areas appropriate/suitable for forestry which is to be used by local councils, governmental entities, NGOs or private land owners/users. Some areas (like Natura 2000 sites, garrigue, arable land) should not be considered for forestation initiatives not to compromise their status, at the same time others should be identified as priority areas for forestry (unused/disused fields; former landfills and queries, degraded woodland etc.). It is important to involve local councils (region councils) in the process of identification of areas favourable for forestation projects<sup>1</sup>, as well as to engage the local authorities in management of such areas. In this context, objectives should also cover the system of monitoring and management.</p> <p><sup>1</sup><a href="#">Biodiversity guidelines for forest landscape restoration opportunities assessments   IUCN Library System</a></p>	<p>The Guidelines shall highlight the need of proper site assessment in terms of its potential or otherwise to sustain trees, as well as the need to adopt different approaches depending on the site in question. The Guidelines shall provide general advice and pointers that may vary depending on the nature of the project. Indeed, aware of the different scenarios that each project might present, it is acknowledged that each initiative would require a tailor-made approach. The Authority shall remain available for discussions and provision of advice as is currently the case..</p>
	<p>The main Objective 2 states that the authority shall "encourage greening and ecological restoration incentives in different areas using suitable species". We suggest substituting 'suitable species' with 'native/local species of flora'. It is important that the species recommended for</p>	<p>The use of native and/or archaeophytic species of trees and shrubs shall be highlighted in the Guidelines, especially when considering forestation in natural and/or rural areas.</p>

		<p>forestation initiatives include not only trees, but also shrubs depending on habitat and ecosystem in question.</p>	
		<p>The Objective 3 seeks “to establish common standards of good forestation practices, in line with complimentary national legislation”. Here would be useful to refer not exclusively to national legislation, but the EU standards and obligations<sup>2,3,4</sup> (keeping in mind also the EU pledge to plant 3 billion additional trees by 2030 under the EU Biodiversity Strategy 2030) and useful international guidelines<sup>5,6,7</sup>.</p> <p><sup>2</sup><a href="#">EUR-Lex - 32021R0268 - EN - EUR-Lex (europa.eu)</a></p> <p><sup>3</sup><a href="#">EUR-Lex - 32018R0841 - EN - EUR-Lex (europa.eu)</a></p> <p><sup>4</sup><a href="#">new EU forest strategy 2030.pdf (europa.eu)</a></p> <p><sup>5</sup><a href="#">Microsoft Word - PFCODE-Combined FINAL.doc (fao.org)</a></p> <p><sup>6</sup><a href="#">Microsoft Word - AR Requirements v0-9 mistakes adapted.docx (goldstandard.org)</a></p> <p><sup>7</sup><a href="#">Pan-EuropeanAfforestationReforestationGuidelines.pdf (foresteurope.org)</a></p>	<p>This comment is duly noted and taken into consideration in development of the Guidelines.</p>
		<p>It is proven that access to woodland contributes to human physical health, improves mental wellbeing and increases quality of life. Therefore, one of the objectives of the document should be to define and promote a methodology to quantify an accessible area covered with forest required for social health and wellbeing<sup>8</sup>. In this sense, one would cater for a more planned approach to the future amenity of an afforested area, recognising its potential for human well-being. Such careful planning would prevent any uprooting of trees or repurposing of such areas in the future, as we have seen with certain areas like Ta’ Qali where some damage may have been incurred as a result.</p> <p><sup>8</sup><a href="#">space-for-people-woodland-access.pdf (woodlandtrust.org.uk)</a></p>	<p>These Guidelines are intended to define key considerations for tree-planting projects. The proposed considerations go beyond the scope of these Guidelines <i>per se</i>. The concept identified here may be considered in other policy documents related to trees that will be developed. Reference is made to intents published earlier on in connection with the National Trees and Woodlands Strategy and those for Landscaping Guidelines.</p>
		<p>Should the Guidelines cover wood production, the objectives should include providing best available practises for wood production and harvesting (such as promoting an appropriate timing for wood harvesting which should not coincide with the breeding season of bird species using the area as their habitat).</p>	<p>These Guidelines are not intended to cover wood production.</p>