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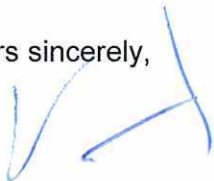
24th August 2022

Subject: Consultation on the SEA Environmental Report of the Common Agricultural Policy Strategic Plan 2023-2027

ERA welcomes the opportunity to comment on the SEA Environmental Report of the CAP Strategic Plan, which the Authority received by email on 29th July 2022.

The conclusions in the Environmental Report are noted. ERA considers that its comments (enclosed) should be taken into consideration in the Environment Report so as to ensure that potential environmental impacts associated with projects supported by this Plan are mitigated at an early stage.

Yours sincerely,



Mr. Kevin Mercieca
Acting Chief Executive Officer
Environment and Resources Authority



ERA's comments on the Strategic Environmental Assessment (SEA) Environmental Report of the CAP Strategic Plan for 2023-2027

24th August 2022

1. Introduction

1.1 ERA welcomes the opportunity to comment on the Strategic Environmental Assessment (SEA) Environment Report (ER) of the CAP Strategic Plan 2023-2027

1.2 The following comments are provided without prejudice to ERA's review and comments on any development projects that may be supported by this Plan, when more detailed environmental assessment may be required. Depending on their nature, scale and context, proposed projects may also require different types of environmental assessments or other related screenings, including Environmental Impact Assessment (EIA) and/or project-level Appropriate Assessment, as relevant. These project-level mechanisms are important to ensure that any site-specific adverse impacts on the environment are mitigated at an early stage.

2. General comments

2.1 Particular proposals in the Plan support physical development, additional infrastructure and similar interventions, such as waste management, the use of renewable energy sources and upgrading of rural roads and road infrastructure. Whilst other initiatives do not promote development directly, they may still result in specific projects, such as afforestation. The potential impacts of these measures on biodiversity, land and the landscape are unknown at this stage since the details of most of the emerging projects (e.g. scale, extent and location) are currently not available, however, depending on the types of works envisaged, these interventions could end up having both localised and cumulative impacts on the rural environment.

2.2 ERA considers that the choice of location for such proposals is crucial to avoid significant environmental impacts. Therefore, the Environment Report (ER) should clearly recommend that preference should be given to proposed development, infrastructure and similar interventions which are least harmful to the environment, which are primarily accommodated in existing suitable committed sites, away from important environmental areas, such as valleys, ridge-edges, cliffs, escarpments, natural habitats and sites, natural coast, etc. Moreover, it is important to ensure that the siting of development and similar interventions on site avoid impacts on site features like rubble walls, trees, etc.

2.3 ERA is of the opinion that the CAP Strategic Plan should support projects that seek to:

- (i) make efficient use of existing legitimate buildings, structures and infrastructure, so as to avoid new development pressures scattered in the countryside;
- (ii) restore already degraded land, natural habitats and landscapes where reasonably possible as well as prevent adverse environmental impacts that may arise from indirect and consequential implications of development, such as impacts associated with widening of rural roads, infrastructure, rural tourism, etc., and
- (iii) improve specific aspects of the environment, including the protection and conservation of the natural/rural environment, including site topography, natural physical features, valleys and watercourses, cliffs/escarpments, old rubble walls, traditional terraced fields, mature trees (e.g. carobs), areas of garrigue

(*xagħri*), maquis or mosaic landscapes (made up of a mix of patches of arable land and patches of garrigue/maquis, and/or characterised by non-trivial rock outcrops, etc.). If implemented correctly, depending on the type of interventions envisaged and other site-specific issues, such measures could also have a beneficial impact on protected sites (SACs and SPAs).

- 2.4 Moreover, it is noted that certain proposals are linked to other plans/policies to which ERA has already provided comments through the SEA process, such as the Solar Farms Policy 2017 (as updated). **It is therefore important that ERA's environmental input into such processes be duly taken into consideration in future proposals supported by this Plan.**

Project-level environmental assessments

- 2.5 ERA concurs with the conclusion of the ER that particular measures in the Plan, such as waste management, upgrading of rural roads, etc., would need to be assessed further at project-selection stage, when more details become available, in view of their potential environmental impacts. **The ER already acknowledges that particular projects may require an Environmental Impact Assessment (EIA). The ER should also equally acknowledge that any future projects supported by this Plan, that could have significant adverse impacts on Special Areas of Conservation (SACs) and Special Protected Areas (SPAs) will also require an Appropriate Assessment (AA) study.**

3. Comments on Chapter 7 - Assessment of Environmental Effects and Proposed Mitigation

- 3.1 ERA's detailed comments on Chapter 7 in relation to the assessment of environmental effects are being included in Appendix 1. **Where relevant, the ER is to be revised/updated accordingly.**
- 3.2 ERA is of the opinion that the impact assessment study on biodiversity, flora and fauna should also take into consideration: (i) invasive alien species; (ii) intensification of agricultural activities to the detriment of natural habitats and species; and (iii) water usage/abstraction from areas supporting riparian habitats and species. **Table 7.2 in the ER needs to be amended accordingly.**
- 3.3 It is noted that various measures proposed in the CAP Strategic Plan under Specific Objectives 4, 5 and 7 have not been addressed in the impact assessment study of the ER (see detailed comments in Appendix 1). **The potential environmental impacts of these measures should be assessed in the ER and suitable mitigation measures should be identified accordingly.**
- 3.4 The ER highlights various mitigation measures to prevent or minimise adverse environmental impacts. Generally, ERA concurs with the proposed mitigation measures in the ER, as such measures address some of ERA's main concerns regarding the prevention of particular impacts identified in the SEA study. **Therefore, it is recommended that the Plan should only support projects that respect these measures. Projects without suitable environmental safeguards should not be considered, so that environmentally damaging interventions are avoided at plan-stage as much as possible.**

4. Alternatives

- 4.1 ERA notes the conclusion of the ER that Scenario 3 (i.e. the draft CAP SP as proposed) has the most significant positive impacts, assuming the complete take up of funds available for the

implementation of measures such as IPM, organic farming, the eco-schemes and biodiversity conservation amongst others.

5. Recommendations

- 5.1 ERA acknowledges the recommendations highlighted in Chapter 8 of the Environmental Report for the CAP Strategic Plan, particularly: (i) the proposed hierarchy of mitigation measures; (ii) measures to reduce GHG emissions to address climate change; (iii) measures addressing actions in Natura 2000 sites; and (iv) the selection of projects during implementation. The ERA recommendation highlighting that proposals/initiatives which address a number of environmental concerns should be given priority, is welcomed.
- 5.2 Proposals for afforestation projects are also welcomed as long as these are within suitable site contexts.

6. Other Comments

- 6.1 Other comments on Chapter 4, regarding the environmental baseline, are provided in Appendix 2.

Appendix 1

ERA comments on Chapter 7 – Assessment of Environmental Effects and Proposed Mitigation

Objectives and measures as highlighted in the ER	Impact assessments as highlighted in the ER	Mitigation measures as proposed in the ER	ERA comments
<p>Specific Objective 1: To support viable farm income and resilience of the agricultural sector across the Union in order to enhance long-term food security and agricultural diversity as well as to ensure the economic sustainability of agricultural production in the Union.</p> <p><i>Relevant measures in the ER:</i></p> <ul style="list-style-type: none"> - Land-based farms (at a higher level of support than provided through the RDP 2014-2020 due to evidence that there has been further decline in this sector) - Direct payments to small farms; 	<p>High demand on fossil fuels for energy.</p> <p>Installation of three Urban Waste Treatment Plants and eventual associated distribution infrastructure to promote use of 'new water'.</p>	<p>Investing in renewable energy.</p> <p>Site-specific advice how to improve water management and waste management to be delivered for projects funded through the CAP.</p>	<p>Renewable energy in rural locations should be directed towards existing committed large-scale developments (e.g. livestock farms) away from sensitive areas such as remote rural locations, natural sites and landscapes. The development of such facilities on undeveloped land and small sites should be avoided.</p> <p>The ER needs to assess the potential environmental impacts of implementing such infrastructure. ERA recommends that such facilities should preferably be accommodated on suitable already-committed sites.</p>
<p>Specific Objective 2: To enhance market orientation and increase farm competitiveness both in the short and long term, including greater focus on research, technology and digitalisation.</p> <p><i>Relevant measures in the ER:</i></p> <ul style="list-style-type: none"> - Off-farm investments relating to infrastructure; 	<p>Potential negative impacts from interventions related to infrastructure.</p>	<p>Carry out project-level screening and impact assessments for proposals that involve infrastructure development or development in the rural environment.</p>	<p>Proposals under this objective involve the provision of new or upgraded infrastructure such as renewable energy, roads, water and waste management and treated wastewater. ERA recommends that such infrastructure should not result in the take-up of additional undeveloped land unnecessarily and should avoid natural areas (such as valleys, watercourses, ridge-edges, garrigue, maquis, protected areas, etc.) and important landscapes in order to avoid major environmental impacts.</p> <p>With regards to the measure 'investment in agricultural holdings</p>

<ul style="list-style-type: none"> - Investment in agricultural holdings to support farms modernisation and restructuring; - Investment in renewable energy resources; - Improved waste management; and - Upgrading of rural roads. 	<p>The measure related to the development/upgrading of rural roads will likely to have the following impacts:</p> <ul style="list-style-type: none"> • loss of habitat and fragmentation; • loss of soil; and • dust generation (localised impact). 	<p>Proposals for rural roads require consultation with the relevant authorities. Funds are to be allocated to rural roads that are already existing and that require maintenance to prevent soil sealing.</p> <p>Moreover, clearing of vegetation along verges of country roads shall no longer be carried out. Materials used for rural roads are to be sympathetic with the rural environment. Avoiding black tarmac. Beneficiaries should also be required to develop and implement soil management plan.</p>	<p>to support farms modernisation and restructuring', ERA considers that upgrades for legitimate small-scale activities are not of major concern as long as development takes place within the farm curtilage as much as possible to avoid significant lateral expansions onto adjacent rural land. Large-scale facilities should preferably be accommodated on suitable already committed sites.</p> <p>It is unclear how the impact assessment classified the proposed measure 'development/upgrading of rural roads' as positive, when the ER itself highlights that such measure could result in potential loss of habitat and fragmentation. Table 7.2 in the ER needs to be amended accordingly.</p> <p>With respect to the upgrading of rural roads, road works that are limited to the existing footprint of existing roads and do not significantly alter the nature of the land surface are generally considered to be the least environmentally damaging. Proposed works should not result in the construction of new/widening of rural roads, hardsurfacing, damage to the land surface and its features (including wayside flora/habitats, the rural terrain itself, etc.), damage to/destruction of rural features such as mature trees, old rubble walls, natural rock outcrops, natural habitats, etc.</p> <p>The ER also highlights that 'if interventions are limited to upgrading, the impact could be insignificant as long as appropriate measures are in place to eliminate, reduce or contain potential impacts such as a result of run-off, spill-over effects or accidental spills that could result in impacts to biodiversity in the area.' This approach should be the preferred way forward.</p>
	<p>Interventions related to waste management infrastructure could result in indirect impacts of surface water and possibly groundwater during construction, depending on the magnitude and site.</p> <p>There may be changes to the</p>	<p>Waste management infrastructure to target practices that are harmful to the aquatic environment (e.g. disposal of slurry in sewerage network).</p>	<p>Waste management infrastructure will require provision of large-scale facilities, which may result in land take-up and impacts on the landscape, rural environment and biodiversity. These potential environmental impacts should be addressed in the impact assessment section in the ER. It is recommended that any large-scale facilities related to waste management are to be directed towards already developed sites and similarly committed land.</p> <p>Renewable energy in rural locations should be directed towards</p>

	<p>landscape of rural areas as a result of installation of PV panels.</p>	<p>and siting of solar farms, where relevant, must follow policy and guidance, namely the Solar Farm Policy 2017 and the Rural Policy and Design Guidance 2020. Assessment of potential impacts on landscape and culture may be required.</p>	<p>existing committed large-scale developments (e.g. livestock farms) away from sensitive areas such as remote rural locations, natural sites and landscapes. The development of such facilities on undeveloped land and small sites should be avoided.</p>
<p>Specific Objective 4: To contribute to climate change mitigation and adaptation including by reducing greenhouse gas emissions and enhancing carbon sequestration, as well as to promote sustainable energy.</p> <p><i>Relevant measures in the ER:</i></p> <ul style="list-style-type: none"> - Investment aids for farm and business development and diversification; - Interventions covering agri-environment-climate measures (funded under Pillar 2) and eco-schemes (actions that may include carbon-building soil management practices, tree planting and permanent cropping). 	<p>Implementation of eco-schemes and agri-environment climate measures seek to have positive impacts on:</p> <ul style="list-style-type: none"> • biodiversity, through tree planting; • soil quality through the reduction in the use of PPP; • GHG emissions through improved technologies; and • the rural landscape. 	<p>Promote uptake of eco-schemes, training and investment in cleaner technologies and ensure that implementation is coordinated where relevant, to ensure consistency.</p>	<p>The ER identifies that all of the measures proposed under this objective will contribute to positive impacts on all of the environmental criteria. The extent of the impact on biodiversity, agricultural products, water quality, air quality, climate change and soil quality will depend on the degree of implementation and uptake of eco-schemes. In this regard, the CAP should seek to promote uptake of these measures.</p> <p>Particular measures mentioned in the CAP SP under Specific Objective 4 do not seem to have been assessed in the impact assessment study. These include:</p> <ul style="list-style-type: none"> - <i>Update current infrastructure to encourage water efficiency;</i> - <i>Expansion of provision of treated wastewater;</i> - <i>Use of animal and agricultural waste and residues for energy production or to be used for fertilizer and soil conditioning; and</i> - <i>Renewable energy generation and enhanced energy efficiency on farms.</i> <p>ERA's comments in relation to these measures are as follows:</p> <p>(i) The ER needs to study the possible environmental impacts of updating current water infrastructure and in relation to the provision of treated wastewater;</p> <p>(ii) Whilst utilisation of animal and agricultural waste and residues for energy production is noted, this is likely to involve provision of large-scale facilities. The ER should</p>

<p>Specific Objective 5: To foster sustainable development and efficient management of natural resources such as water, soil and air, including by reducing chemical dependency.</p> <p><i>Relevant measures in the ER:</i></p> <ul style="list-style-type: none"> - At national scale, investments in water infrastructure for treated urban wastewater are to continue distribution to the main agricultural areas of the Maltese Islands; - Smaller scale investment will include enhanced water capture facilities on farms, restoration and renovation of water management features in the landscape; - Maintenance of traditional boundaries for soil protection. 	<p>Investment in water capture facilities on farms, restoration and renovation of water management features in the landscape; planting of trees and shrubs; maintenance to rubble walls for soil protection; training in water protection and enhancement techniques, etc., are expected to have positive impacts on:</p> <ul style="list-style-type: none"> • Biodiversity; • Water quality; • Air quality; • Climate change adaptation; • Soil quality; • Landscape and cultural heritage. 	<p>Promote uptake of eco-schemes and ensure that interventions respect the rural/cultural landscape.</p>	<p>highlight that environmental impacts could be mitigated by accommodating such facilities on suitable already committed sites; and</p> <p>(iii) Renewable energy in rural locations should be directed towards existing committed large-scale developments (e.g. livestock farms) away from sensitive areas such as remote rural locations, natural sites and landscapes. The development of such facilities on undeveloped land and small sites should be avoided.</p>
<p>Proposed interventions under this objective include investment in water capture facilities on farms, restoration and renovation of water management features in the landscape; planting of trees and shrubs; maintenance to rubble walls for soil protection; training in water protection and enhancement techniques.</p> <p>The ER identifies that all of these measures will contribute to positive impacts on all of the environmental criteria. For most of the measures, the extent of the impact on biodiversity, agricultural products, water quality, air quality, climate change and soil quality will depend on the degree of implementation and uptake of eco-schemes. In this regard, it must be ensured that relevant environmental safeguards and standards are respected both during the design and implementation of such measures.</p> <p>Works in valleys and other water features (such as springs) that are still in a relatively pristine state or which would be adversely affected by such site reengineering should be avoided in the first instance. In practice, site interventions involving dams, interventions on watercourses and their banks, dredging of watercourses, etc. tend to be relatively intensive interventions and could impact the biodiversity, geomorphological heritage and landscape value of valley systems. Natural habitats and features should be effectively conserved and restored to their pristine state for their ecological natural and landscape value. It is recommended that any proposed works in valleys and watercourses are to be discussed with ERA at an early stage with</p>			

			<p>the intention of avoiding and mitigating adverse environmental impacts on the site and its surroundings.</p> <p>With regards to the maintenance of traditional field boundaries, it is important that any proposed interventions shall respect the rural characteristics of the local area by using traditional methods and materials. Rubble walls are to retain their original height to ensure compatibility with the surrounding context. Retaining walls along field terraces should not be raised higher than the upper soil level. New/reconstructed/re-developed rubble walls should respect the natural topography and the height of traditional rubble walls in the surrounding context, without obstructing rural views.</p> <p>It seems that various other measures proposed in the CAP SP under Specific Objective 5 have not been addressed in the impact assessment study. These include:</p> <ul style="list-style-type: none"> - <i>Adequate treatment of farm waste to reduce groundwater pollution;</i> - <i>Rural infrastructure;</i> - <i>Management of habitats and Natura 2000; and</i> - <i>Afforestation, water management, reduction of flood risks and improvement of soil conservation, reclamation and restoration of marginal or derelict land.</i> <p>ERA's comments in relation to these measures as follows:</p> <p>(i) The ER should assess the potential environmental impacts of the above-mentioned measures and identify suitable mitigation measures;</p> <p>(ii) Measures addressing actions in Natura 2000 sites should be discussed with ERA at an early stage. The CAP Strategic Plan should seek to ensure that proposed measures do not affect the integrity of Natura 2000 sites or relevant species and habitats and avoids conflicts with the environmental priorities of other environmental plans and policies;</p>
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<p>Specific Objective 6: To contribute to halting and reversing biodiversity loss, enhance ecosystem services and preserve habitats and landscapes.</p> <p><i>Relevant measures in the ER:</i></p> <ul style="list-style-type: none"> - Conservation and sustainable use of genetic resources; 		<p>Potential negative impacts with respect to biodiversity could arise if honeybees become too numerous or if not enough flowers are available, whereby they risk outcompeting wild bee/pollinator populations.</p> <p>Secondary impact on the plant community possible, if wild populations are affected.</p>	<p>(iii) Proposals for afforestation projects are welcomed, as long as these are located within suitable site contexts; and</p> <p>(iv) Reclamation and restoration of land should only be considered on legitimate agricultural land as these could end up damaging ecosystems, natural habitats and the rural landscape, for instance deposition of inert material and soil onto natural sites (e.g. garrigue) under the pretext of reclaiming or restoring of marginal or derelict land.</p>
<p>Specific Objective 7: To attract and sustain young farmers and new farmers and facilitate sustainable business development in rural areas.</p> <p><i>Relevant measures in the ER:</i></p> <ul style="list-style-type: none"> - Assistance in business start-ups for young farmers in Malta including the setting up of a business plan, management and financial skills development and other training and technical 	<p>Potential negative effects from development on natural land, from funding through EAFRD for interventions such as the construction of structures.</p> <p>Potential impact on water resources, GHG emissions/air quality, soil, landscape from young farmers entering the sector.</p> <p>Certain interventions may result in impacts on the landscape whereas others may not have significant effects.</p>	<p>Selection criteria should ensure that siting of apiculture operations does not result in large operations near wild flower / natural areas. Consultation with ERA is required.</p>	<p>ERA notes and agrees that proposals related to apiculture operation would require early discussions with ERA, in order to ensure suitable siting and other potential environmental impacts.</p> <p>Interventions related to land-based management commitments could have beneficial impacts on the environment, including on biodiversity and ecosystems. Sub-measures of this objective include maintenance of trees, implementation of soil management and conservation plan, organic conversion and maintenance, etc. Such proposals should be given priority.</p>
<p>Specific Objective 7: To attract and sustain young farmers and new farmers and facilitate sustainable business development in rural areas.</p> <p><i>Relevant measures in the ER:</i></p> <ul style="list-style-type: none"> - Assistance in business start-ups for young farmers in Malta including the setting up of a business plan, management and financial skills development and other training and technical 	<p>Potential negative effects from development on natural land, from funding through EAFRD for interventions such as the construction of structures.</p> <p>Potential impact on water resources, GHG emissions/air quality, soil, landscape from young farmers entering the sector.</p> <p>Certain interventions may result in impacts on the landscape whereas others may not have significant effects.</p>	<p>Impact to be assessed at project level.</p> <p>Ensure that young farmers entering the sector operate in accordance with all regulations, code of conduct and environmental standards so to avoid significant negative impacts.</p> <p>Impacts to be screened/assessed at project level.</p>	<p>The CAP Strategic Plan should seek to avoid additional development pressures in the rural area under the pretext of agriculture. Such practice over the past decades have resulted in adverse impact on the natural environment and the rural landscape, both in terms of the immediate site context and in terms of cumulative degradation of the wider rural area. In this regard, the ER should clearly highlight that development of these structures should be linked with genuine and legitimate agricultural activity. There should also be a presumption against the conversion and change of use of such structures for other uses, as well as new/extended development which is only weakly related to agricultural activity. Examples include:</p> <ul style="list-style-type: none"> - nominal agritourism development (which have minimal agricultural relevance or which actually displace pre-existing agricultural use); - developments that are supposedly ancillary to existing

<p>advisory support as required.</p>		<p>agricultural uses but are ultimately disproportionate or out of sync vis-a-vis the actual agricultural use (e.g. residential or commercial structures/uses, parking areas, etc)..</p> <p>It seems that various other measures proposed in the CAP SP under Specific Objective 7 have not been addressed in the impact assessment study. These include:</p> <ul style="list-style-type: none"> - <i>Stimulate new business activities in rural areas (e.g. farm diversification, food tourism, local food labelling, cultural heritage);</i> - <i>Opportunities for developing niche markets and diversification of some sectors such as tourism into rural-oriented and environmental business;</i> - <i>Strategy for land consolidation- potential for re-parcelling land;</i> - <i>Provide opportunities to support new rural business ventures that can complement and add value to rural incomes and help to promote rural quality of life among part-time farmers and other rural households; and</i> - <i>Facilitate land consolidation and easier farm transfer between generations through ongoing legislative changes and monitor their impacts.</i> <p>ERA's comments in relation to these measures as follows:</p> <p>(i) The ER should assess the potential environmental impacts of the above-mentioned measures and identify suitable mitigation measures accordingly;</p> <p>(ii) With regards to 'Stimulate new business activities in rural areas', (e.g. environmental labelling) it is recommended that the proposed measures in the Plan are directed towards increasing further the valorisation of Malta's touristic product, without promoting additional development pressures in the rural environment.</p> <p>(iii) The CAP SP should regard rural tourism accommodation as</p>
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any other physical development in the countryside. Rural recreation and tourism tend to increase demand for the take-up of rural land for ancillary facilities such as buildings, access routes, widened roads, new or formalised car parks, etc. Other individually trivial interventions such as street furniture, CCTV camera poles, signage and panels, infrastructural services etc., may also be problematic, particularly if excessive in quantity (cumulative impact) or poorly designed/located.

(iv) The Plan's proposals to facilitate land consolidation, that involves restructuring of the land [CAJAE1][KDae2]is welcomed, as long as within suitable site contexts. It must be ensured that such physical interventions do not result in adverse environmental impacts, such as topographical re-engineering, demolition of old rubble walls, destruction of non-arable elements and rural features such as natural outcrops, clumps of trees, diversion or channelisation of watercourses, etc.

ERA comments on Chapter 4 – Environmental Baseline

Biodiversity

1.1 ERA suggests the following revisions:

- Par 4.8 - *‘Malta’s natural environment can be characterized under three subcategories including terrestrial, freshwater and marine habitats. ~~includes habitats such as cliffs, valleys, garrigue, and sand dunes.~~ Forest and natural vegetation’* to be amended to *‘Forest and natural areas’* in accordance with the SOER (2018).
- Par 4.9 to be revised as follows: *‘The local terrestrial vegetational assemblages are composed by three groups: (i) major communities that are part of the succession towards climax communities; (ii) minor communities that are either specialised to occupy particular habitats, or occupy habitats that are rare, or are relics from a previous ecological regime, and; (iii) vegetational assemblages of disturbed habitats, which owe their existence to anthropogenic activities. The main vegetational assemblages are maquis, garrigue and steppe, whilst minor ones include patches of woodland, coastal wetlands and saline marshlands, freshwater and rupestral communities and sand dunes. Marine habitats on the other hand include seagrass meadows, algal communities, reefs, caves and sediments.’*
- Par 4.10 - Since joining the European Union in 2004, Malta carried out three assessments in line with the Habitats Directive Article 17. Relevant reports on implementation measures were published in 2007, 2013 and 2019. (<https://cdr.eionet.europa.eu/mt/eu/art17>)
- Par 4.18 – Given that terrestrial SACs include both national and international SACs, the area of terrestrial SACs should read 44.95km² (14.2%). Areas of Ecological Importance (AEI) and Sites of Scientific Importance (SSI) are to be considered separately. The values are to be updated to reflect the following:
 - AEI – 24 sites;
 - AEI & SSI – 42 sites; and
 - SSI – 10 sites.Moreover, the number of sites may not be particularly meaningful, as it includes a mix of extensive areas and small sites. Also, the types of site (e.g. cliff, Marshland, etc) may be very different. More meaningful indicators include land coverage/area, classification by type, etc.
- To replace Figure 4.5 and 4.6 with a more recent version as per <https://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-17> and <https://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-17> respectively.
- Par 4.21 – Reference to *‘Cory’s Shearwater’* should be replaced by Scopoli’s shearwater.

- Par 4.26 – With regards to other important areas that are not protected, to also consider green areas and natural or rural/green enclaves in urban areas or in urban public open spaces as.
- Par 4.27 – With respect to the Habitats Directive, Malta has 26 Annex II species (this excludes occasional, extinct and species on which there is a scientific reserve). Of these, 9 are endemic.
- Par 4.28 – To identify the source of information.

Light pollution

- It is recommended that Par 4.33 also takes into account disturbance to fauna (e.g. bats and birds) from urban lighting, in particular lighting in the vicinity of breeding areas for seabirds.

Water

- ERA would like to clarify that 'ephemeral' (in par 4.44) refers to watercourses only, excluding permanent freshwater pools or the transitional waters (apart from il-Ballut ta M'Xlokk).
- The characterisation of coastal waters (in par 4.64) should be worded as per the official classification of the 2nd River Basin Management Plan (RBMP).
- ERA suggests the following amendments to par 4.66: *Coastal water quality is monitored in line with various Directives including the Water Framework Directive, Marine Strategy Framework Directive, Nitrates Directive, Bathing Water Directive and the UN Barcelona Convention by the Health Inspectorate Services within the Environmental Health Directorate (EHD). Water quality is regulated through the Bathing Water Directive, the UN Barcelona Convention and the Water Framework Directive.*

Noise pollution

- ERA supports reference that the Noise Action Plan (NAP) should be taken into consideration during the development of the CAP Strategic Plan. ERA would like to clarify that the NAP takes into account noise sources that fall within the scope of the Directive and which relate to noise from traffic, industry of a large scale and aviation.

Air quality monitoring

- Information on real time monitoring in par 4.76 is outdated. This is to be updated accordingly.

Green Infrastructure

- Par 4.140 should put more emphasis on the natural environment, rural landscape and biodiversity. With regards to biodiversity, this paragraph is to include that 'the EU's Biodiversity Strategy for 2030 is a comprehensive, ambitious and long-term plan to protect nature and reverse the degradation of ecosystems. The strategy aims to put

Europe's biodiversity on a path to recovery by 2030 for the benefit of people, climate and the planet as per https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en. Also, it should be clarified that bringing nature to agricultural land is not limited to organic farming and soil protection.