



Public Consultation Submissions & Responses

Declaration of the Maltese Honey Bee as a National Species

May 2024

Environment & Resources Authority



CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Dr Charles F. Grech 20/02/2024	<p>I would like to fully support the adoption local subspecies of the honey bee, <i>Apis mellifera ruttneri</i> as the national insect (of agricultural importance). This to be seen as a natural continuation of the protection of local species & subspecies of national interest.</p> <p>I would like to recall that in 1988, I had moved a motion during the the Men of the Trees (Malta) AGM proposing the adoption of the a national tree. Subsequently the Arar (<i>Tetraclinis articulata</i>) was adopted as such on 16th January 1992.</p>	Support of the Maltese Honey Bee as a national insect is being noted.
2	Charlot Attard 27/02/2024	<p><i>Apis mellifera ruttneri</i> differs substantially from the other species in Schedule 1 since it is exploited by human beings for agricultural purposes. Whilst agreeing that the species merits conservation efforts I do not believe that this is the adequate legal framework by which such efforts should be enacted. Neither the Maltese Ox, chicken, goat nor sheep, all of which similarly are exploited for agricultural purposes, are listed in these regulations; they are considered as agricultural races regarded as Maltese genetic resources.</p> <p>In addition the amendments proposed do not support in any way the conservation efforts needed in the regards of this subspecies. One of the major threats which the Maltese honey bee subspecies faces nowadays is the dilution of the gene pool through importation of foreign breeds. The amendments proposed do not tackle this problem; they still allow the trade and introduction potentially <i>en masse</i> of other <i>Apis</i> sub-species causing further deterioration of the Maltese sub-species gene</p>	<p>The Maltese Honey Bee is recognised as an endemic subspecies, rather than a race. It merits conservation for its unique behavioural traits and adaptation to the local climate, while also acting as a flagship species for pollinators. Apiculture has been taken into consideration in the draft Amendment Regulations; the declaration of the Maltese Honey Bee as a national species does not pose negative impacts on apiculture.</p> <p>ERA acknowledges that steps are necessary to define and implement actions to improve the status of local pollinators and to sustain and enhance pollination services. For this reason, ERA intends to develop and adopt a National Strategy and Action Plan for Pollinators to 2035 that includes targets and proactive actions, which would address the protection of pollinators to help them thrive into future generations. The Strategy, the intent for which was already issued for public consultation, will be formulated in</p>

		pool. ERA along with the Agricultural Directorate should seek to protect the Maltese sub-species by selectively breeding it to purify it from hybrids and encourage its use by apiculturists through financial incentives such as those issued for other genetic resources of agricultural importance.	consultation with the relevant entities and stakeholders. This comment will be considered during such process. Moreover, additional work is ongoing by relevant entities, such as the Ministry for Gozo, to strengthen the gene pool of the Maltese Honey Bee.
3	Peter Paul Zammit 28/02/2024	<p>After being requested to review the proposed regulations by Ghaqda Trobbija tan-Nahal u Ghasel Malti and Breeds of Origin Conservancy, and discussions held, may I suggest that the proposed amendment to Regulation 10 is amended as follows and for the indicated reason</p> <p>3. Regulation 10 of the principal regulations shall be substituted by the following new regulation:</p> <p><u>Proviso added.</u></p> <p><i>Provided that for Apis mellifera ruttneri, any registration in terms of the Bee Keeping Regulations involving the use of this species for the production of honey, royal jelly, propolis, beeswax or other honey bee related products, is to be considered as a permit valid under this Regulation and under the Flora, Fauna and Natural Habitats Protection Regulations.”</i></p> <p><u>Reason for change</u></p> <p>There is no registration as of today for specific species based apiflora permit mentioning species of bees held on a site.</p> <p>Therefore the present licence/permit/registration is not safe guarded.</p> <p>Suggested</p> <p>Provided that any registration in terms of the Bee Keeping Regulations for the production of honey, royal jelly, propolis,</p>	<p>Feedback has been considered and the text has been amended as follows:</p> <p>“Provided that for any registration in terms of the Bee Keeping Regulations involving, <i>inter alia</i>, the use of the National Insect for the production of honey, royal jelly, propolis, beeswax or other honey bee related products, is to be considered as a permit valid for <i>Apis mellifera ruttneri</i> under this Regulation and under the Flora, Fauna and Natural Habitats Protection Regulations.”</p>

		<p>beeswax or other honey bee related products, is to be considered as a permit valid under this Regulation and under the Flora, Fauna and Natural Habitats Protection Regulations.</p> <p>Or</p> <p>Provided that <i>for these regulations regarding Apis mellifera ruttneri</i>, any registration in terms of the Bee Keeping Regulations for the production of honey, royal jelly, propolis, beeswax or other honey bee related products, is to be considered as a permit valid under this Regulation and under the Flora, Fauna and Natural Habitats Protection Regulations.”</p>	
4	<p>Abner Joe Buttigieg</p> <p>Foundation for the Conservation of the Maltese Honey Bee</p> <p>01/03/2024</p>	<p>As a beekeeper and co-founder of the NGO "Foundation for the Conservation of the Maltese Honey Bee," I am pleased to note that our proposal has advanced to a public consultation stage. It is heartening to see that the Maltese Honey Bee, a subspecies endemic to this archipelago, could potentially be recognised as a national symbol, integral to our identity.</p>	<p>Support of the Maltese Honey Bee as a national insect is noted.</p>
5	<p>Jan Proschek</p> <p>Earth Systems Association</p> <p>04/03/2024</p>	<p>The proposed amendment to declare the Maltese honey bee (<i>Apis mellifera ruttneri</i>) as a national species holds significant importance.</p> <p>The Maltese Honey Bee has evolved to thrive in Malta’s climate, and is an essential pollinator during the summer months, contributing to the growth of crops. Beyond the economic significance of pollination, the Maltese Honey Bee is utilised to make valuable products which support local apiculture businesses. Further and rapid changes in our climate, and multiple anthropogenic causes have led to a global crisis with</p>	<p>Support of the Maltese Honey Bee as a national insect is noted.</p> <p>The required resources will be identified as part of the drafting of the National Strategy and Action Plan for Pollinators to 2035, which will be taking into consideration all important pollinators, not just the Maltese Honey Bee.</p>

		<p>rapidly decreasing populations of pollinating insects in the wild, which are the backbone of our agricultural resources.</p> <p>Firstly, proceeding with the proposed amendments would be a major step forward in enhancing conservation efforts. The Maltese Honey Bee would serve as a flagship species, helping to increase public awareness on the importance of pollinators as well as providing the relevant protected status measures assigned in the Regulation. The designation as a national species will also attract international interest in the species further increasing interest in funding for potential research projects and conservation efforts.</p> <p>The National Species Status of the Maltese Honey Bee is also a matter of national pride. Such an endemic and rare species should be treated in the highest regard and respect, and the relevant regulations should also reflect this.</p> <p>ESA recommends the adoption of the changes as soon as possible due to the high social and scientific importance of the species. Additionally, we recommend the allocation of funds to an appropriate organisation or agency to fund the conservation of such an economically important species.</p>	
6	Anonymous 07/03/2024	<p>The honeybee is the main pollinator. By promoting the honeybee as the national insect, public awareness would increase. Apart from being a charismatic species, the honeybee may be used as a flagship species to raise awareness and consciousness to influence attitudes towards environment conservation and management first and foremost among the general public.</p> <p>The Maltese honeybee ticks all the criteria of the selection process adopted to identify the Mediterranean killifish as the national fish; the blue rock thrush as the national bird, the</p>	<p>Support of the Maltese Honey Bee as a national insect is noted.</p> <p>ERA has already sought and will continue to seek to educate the relevant sectors of the public. Current citizen scientist studies being led by ERA, such as the Malta Pollinator Monitoring Programme (MPOMS), will provide valuable data on pollinator species in Malta that will help to further raise public awareness of pollinator species at the national level. Moreover, we would note the MPOMS will feed into the development of the National Strategy and Action Plan for Pollinators to 2035</p>

		<p>Maltese rock-centaury as the national plant; the Maltese freshwater crab as the national invertebrate; and the Sandac Gum tree as the national tree.</p> <p>The criteria include being identified as a wild endemic species native to the Maltese fauna of particular importance because of the biodiversity, ecological and scientific interest. Literature refers to the Maltese population as being as hard-working as a bee, so the honeybee is synonymous to the Maltese people. It is also a threatened species due to climate change, so enforcement is key, especially in terms of habitat loss.</p> <p>Finally, education plays a very important role in all this so, investment in cross-curricular environmental education should be also taken on board and implemented in parallel to this award.</p>	ensuring that all pollinator species are given relevant prominence.
7	<p>Fondazzjoni għall-Konservazzjoni tan-Naħla Maltija</p> <p>08/03/2024</p>	<p>The Foundation is delighted to see that its request to designate the Maltese Honey Bee (<i>Apis mellifera ruttneri</i>) as the National Insect of Malta by the Environmental and Resources Authority, has been positively evaluated and that now is at a public consultation stage. As of today, 61% of all Regional and Local Councils have officially supported this initiative, along with organisations, academics and other distinguished individuals.</p> <p>We would like to draw your attention to certain inaccuracies in the Maltese text. For the correct terminology, kindly refer to the <i>Glossarju ta' Termini Marbuta mal-Apikultura</i> by Victoria Christine Buhagiar (2017, University of Malta). The following corrections should be made:</p> <p>ġelatina rjali = ħalib in-naħal</p> <p>propolis = żaftura</p>	<p>Support of the Maltese Honey Bee as a national insect is noted.</p> <p>The suggestions in Maltese wording have been taken into consideration.</p>

		xema' tan-naħal = xama' tan-naħal	
		Furthermore, under schedule 1(b), it states that the Maltese name for <i>Apis mellifera ruttneri</i> is in-naħla; in-naħla ta' Malta . This is incorrect. The actual name, according to the same study, is in-naħla Maltija , whereas in-naħla just refers to the bees and not specifically to the Maltese Honey Bee.	The suggestion has been taken into consideration.
		Regarding the Maltese Crab designated as the National Invertebrate, the title should be amended to the National Crustacean . Both the Maltese honey bee and the Maltese crab are invertebrates. As it is, it gives the crab a higher hierarchy in the national status over the Maltese Honey Bee.	The suggestion has been taken into consideration.
8	Andrew Ricca 13/03/2024	<p>I appreciate the opportunity to participate in this public consultation on the proposal to amend the Species Protection (Designation of National Species) Regulations (S.L. 549.120) to declare the Maltese honey bee as a national species. I believe this is a discussion that leads to a broader conversation about the symbolic representation of our local wildlife, particularly in light of celebrating their intrinsic value, rather than as an instrument towards ensuring the sustainability of the economic sector of apiculture locally.</p> <p>While the Maltese honey bee plays a vital role in pollination and honey production, and that it may also be facing a number of ecological challenges as pointed out by the Fondazzjoni għall-Konservazzjoni tan-Naħla Maltija, the designation of a national species is perhaps more appropriately attributed to a wild endemic insect such as the Maltese ruby tiger moth (<i>Phragmatobia fuliginosa</i> ssp. <i>melitensis</i>) or the Maltese swallowtail (<i>Papilio machaon</i> ssp. <i>melitensis</i>). By doing so, we can redirect our focus towards celebrating the unique biodiversity present in the Maltese islands without emphasizing the semi-domesticated nature of the honey bee. Further to that, the Maltese honey bee can enjoy all the protection necessary for the conservation</p>	<p>The Maltese Honey Bee merits conservation for its unique behavioural traits and adaptation to the local climate, while also acting as a flagship species for pollinators – more so that it has been domesticated. It is a species which is indeed linked to Malta's cultural aspects amongst which when considering the products that are produced through apiculture. In this regard, it is a species which truly illustrates the relationship between endemic biodiversity and Maltese citizens.</p> <p>Furthermore, the National Strategy and Action Plan for Pollinators to 2035 (NSAPP) (the intent for which was published, and preparation is underway) combined with the ongoing Malta Pollinator Monitoring Programme (MPOMS) will highlight the importance of all pollinator species in Malta.</p> <p>The main intent of the NSAPP is to act as the national framework that drives and promotes the safeguarding of pollinator species and their services through a number of short and long-term actions.</p>

	<p>of the species itself and for the local apiculture industry through a dedicated and distinct pollinator's strategy.</p> <p>The recognition of a wild native insect offers a distinct opportunity to showcase and honor the genetic diversity that makes our local ecosystem resilient and vibrant. This choice would not only symbolize our commitment to biodiversity conservation but also emphasize the intrinsic value of our indigenous species, untamed by human intervention, and consistent with the other choices of national species in Malta.</p> <p>Furthermore, opting for a wild native insect encourages the appreciation of wildlife for its own sake. These species contribute to the intricate ecological web, fostering a healthier, more resilient environment. By celebrating a wild native insect, we send a powerful message about the importance of preserving our natural heritage for its inherent worth, rather than solely valuing it for the products it yields. Both the Maltese ruby tiger moth and the Maltese swallowtail satisfy a number of the required criteria including endemism, 'charisma' and potential for environmental appreciation and education, and the capacity favourably influence attitudes towards wildlife conservation.</p> <p>Such an approach also aligns with global conservation efforts and showcases our dedication to the preservation of relatively undisturbed ecosystems. It also provides an excellent opportunity to educate the public on the significance of protecting the natural balance of our environment and appreciating the often-overlooked beauty of our native wildlife.</p> <p>In conclusion, I encourage a thoughtful reconsideration of the proposed national insect, with a focus on a wild native species that exemplifies the unique genetic diversity within our ecosystem. Let us take this opportunity to celebrate and send a message that protecting</p>	<p>Specifically the NSAPP will aim:</p> <ul style="list-style-type: none"> • to improve our understanding of key pollinators, including their status and their services; • to develop targets and proactive actions for the protection, management and conservation of pollinators; • to address the effective management of pressures and threats impacting pollinators; • to contribute to the safeguarding of pollination services even beyond its contribution to the environment; and • to raise awareness, promote collaboration, and engage the relevant stakeholders, such as local entities and society-at-large, to ensure that the pollinators' needs are met.
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		our local wildlife is a valuable endeavor for its own sake, promoting a deeper connection with nature and a commitment to the conservation of our invaluable natural heritage.	
9	Perit Jorge Spiteri 16/03/2024	<p>Nota Ġenerali: It-termini tekniċi relatati mas-Settur tal-Apikultura li intużaw f'dan il-kontribut għal-konsultazzjoni pubblika ingiebu kollha minn studju ta' Master fl-Interpretazzjoni minn Victoria Christine Buhagiar bl-isem ta' Glossarju ta' Termini Marbuta mal-Apikultura li sar fl-2017.</p> <p>Sfond: Is-settur tal-Apikultura f'MALTA huwa wieħed frammentat minhabba li jaqa taħt diversi Ministeri u entitajiet pubbliċi fosthom, il-Ministeru tal-Agricoltura(saħħa tan-naħal), il-Ministeru tal-Ambjent(Ġenetika tan-naħal), il-Ministeru tal-Intrapriżi(intrapriża agrikola), il-Ministeru tas-saħħa(ikel għall-konsum uman). Għaldaqstant in-naħħal Malti jsib diffikulta' meta jiġi b'zonn jikkomunika xi ħaġa relatata mas-settur tal-Apikultura għax ma jkunx jaf fejn għandu jmur jitkellem u meta jmur faċilment jintbghat x'imkien ieħor minhabba din il-frammentazzjoni. Għaldaqstant hemm b'zonn li jew tinholoq taqsima ġdida fejn kull m'għandu x'jaqsam mal-apikultura jingabar fiha jew jinholoq kumitat li fih ikun hemm rappreżentanti kompetenti minn kull Ministeru li jmiss mas-settur tal-Apikultura. Hemm b'zonn ukoll li jitfasslu regolamenti li jharsu s-sostennibbilta' tal-Apikultura f'MALTA li jagħmlu referenza għall-prattiċi tajba tal-Apikultura anki skond l-FAO. Għaldaqstant nipproponi li ġej:</p> <p>Jemenda r-regolament 4 tar-regolamenti prinċipali</p> <p>Jiżdid paragrafu (ċ) fl-ispirtu ta' li ġej:</p> <p>“(ċ) it-Taqsima tar-Regolamentazzjoni għall-Apikultura, skond dak pprovdut fir-Regolamenti dwar it-Trobbija tan-Naħal.”</p>	<p>Il-kummenti ġew innutati minkejja li jmurru oltre mill-iskop ta' din il-konsultazzjoni li hija dwar id-dikjarazzjoni tan-naħla ta' Malta bħala speci nazzjonali.</p> <p>L-Awtorità kompetenti proposta fl-abbozz sabiex tħares in-naħla ta' Malta bħala l-insett nazzjonali hija l-ERA, hekk kif preskritt fil-paragrafu (a) tar-regolament 4 tar-Regolamenti dwar il-Ħarsien ta' Speci Protetti (Dikjarazzjoni ta' Speci Nazzjonali) (L.S. 549.120) li huma ppromulgati taħt l-Att dwar il-Protezzjoni tal-Ambjent.</p>

	<p>Sfond: Xi speċi huma dawk użata għall-apikultura? Jekk dawn huma sotto speċi ta' <i>Apis mellifera</i> jkun nuqqas kbir jekk ma jsirux regolamenti ta' kif it-tali sotto speċi mhux endemiċi għandhom jintużaw f'MALTA speċjalment f'żoni protetti bħal Natura 2000. Għaldaqstant nipproponi li ġej:</p> <p>Jemenda r-regolament 8 tar-regolamenti prinċipali</p> <p>Il-paragrafu (ċ) tar-regolament 8 tar-regolamenti prinċipali għandu jiġi sostitwit b'dan il-paragrafu (ċ) ġdid li ġej:</p> <p>“(ċ) tippreveni l-introduzzjoni, tikkontrolla jew teqred dawk l-ispeċi aljeni u/jew invażivi li jistgħu jheddu l-ispeċi Nazzjonali dment li tali miżuri ma jmorrux kontra r-Regolamenti dwar it-Trobbija tan-Naħal; u”</p>	<p>L-ERA hi tal-opinjoni li t-test kif propost fl-abbozz ippubblikat huwa iktar ċar peress li jissalvagwardja s-settur tal-apikultura b'mod aktar miftuħ.</p>
	<p>In-Naħal jipproduċi iktar prodotti minn dawk imsemmija u tul iż-żminijiet jinstabu iktar prodotti li minnhom jista jagħmel użu l-bniedem. Għaldaqstant nipproponi dan li ġej:</p> <p>Jemenda r-regolament 10 tar-regolamenti prinċipali.</p> <p>Ir-regolament 10 tar-regolamenti prinċipali għandu jiġi sostitwit b'dan ir-regolament ġdid li ġej:</p> <p>“10. Kwalunkwe valutazzjoni mwettqa jew permess maħruġ mill-awtorità kompetenti skont ir-regolamenti rilevanti għandhom jitqiesu bħala maħruġa taħt dawn ir-regolamenti: S.L. 36.36. S.L. 549.44 Iżda għall-<i>Apis mellifera ruttneri</i>, kull reġistrazzjoni skont ir-Regolamenti dwar it-Trobbija tan-Naħal li tinvolvi l-użu ta' din l-ispeċi għad-dakra bl-għabra tad-dakra sigar tal-frott, tal-fjuri, u tal-ħxejjex ikkultivati u mhux ikkultivati; għall-terapija u</p>	<p>L-abbozz ġie amendat biex tindirizza dan il-kumment:</p> <p>“Iżda kull reġistrazzjoni skont ir-Regolamenti dwar it-Trobbija tan-Naħal li tinvolvi, <i>inter alia</i>, l-użu ta' l-Insett Nazzjonali għall-produzzjoni ta' għasel, ħalib in-naħal, żaftura, xama' tan-naħal jew prodotti oħra relatati man-naħal tal-għasel, għandha titqies bħala permess validu għall-<i>Apis mellifera ruttneri</i> taħt dan ir-regolament u taħt ir-Regolamenti dwar il-Ħarsien tal-Flora, Fawna u Ambjenti Naturali.”</p>

	<p>esperjenzi sensazzjonali; għall-produzzjoni ta' għasel, ħalib in-naħal, żaftura, xama' tan-naħal u/jew prodotti sussidjarji oħra relatati man-naħal tal-għasel, għandha titqies bħala permess validu taħt dan ir-regolament u taħt ir-Regolamenti dwar il-Ħarsien tal-Flora, Fawna u Ambjenti Naturali.”</p>	
	<p>Sfond: Filwaqt li speċi nazzjonali t'annimali oħra jingħaddu bl-irjus, in-naħal fin-natura tiegħu għandu jingħadd bħala bejta jew kolonja li tikkonsisti minn diversi naħal ħaddiem, bgħula, u reġina. Għaldaqstant hemm bżonn li b'mod ġenerali jiżdiedu d-definizzjonijiet rispettivi u nipproponi dan li ġej:</p> <p>Jemenda r-regolament 11 tar-regolamenti prinċipali.</p> <p>“11.Sakemm ma jkunx ordnat tinqered speċi nazzjonali minħabba mard notifikabbli skond S.L. 36.36 jew minħabba theddidha ta' saħħa fiżika (f'każ ta' allergiji fatali) dan li ġej japplika. Meta l-awtorità kompetenti temmen li persuna tkun ikkommettiet reat taħt dawn ir-regolamenti fuq speċi imniżzla fl-Iskedal(b), l-awtorità kompetenti tista' toħroġ multa amministrattiva ta' mhux inqas minn sebgħa mija u ħamsin euro (€750) għal kull eżemplari, fejn għal <i>Apis mellifera ruttneri</i> l-eżemplari huwa meqjus bħala bejta jew kolonja naħal, iżda mhux iżjed minn ħamest elef euro (€5,000) għal kull eżemplari:</p> <p>Iżda l-awtorità kompetenti tista' toħroġ multa amministrattiva għall-istess persuna darba biss taħt dawn ir-regolamenti:</p> <p>Iżda ebda proċediment m'għandu jittiehed jew jitkomplakontra l-imsemmija persuna għar-reati msemmija f'dan ir-regolament jekk kemm il-darba din il-persuna tħallas dik il-multa amministrattiva.</p>	<p>Dwar il-proposta li jiġi inkluz it -test '<i>Sakemm ma jkunx ordnat tinqered speċi nazzjonali minħabba mard notifikabbli skond S.L. 36.36 jew minħabba theddidha ta' saħħa fiżika (f'każ ta' allergiji fatali) dan li ġej japplika</i>', huwa meqjus li dan l-aspett huwa diġà kopert permezz tal-amendi f'regolament 10 dwar permessi u għaldaqstant mhix qiegħda tiġi inkluz fir-regolament 11.</p> <p>Dwar it-test '<i>fejn għal Apis mellifera ruttneri l-eżemplari huwa meqjus bħala bejta jew kolonja naħal</i>', id-definizzjoni ta' eżemplari qed jiġi mibdul fi:</p> <p>“Iżda it-terminu 'eżemplari' fil-kuntest ta' <i>Apis mellifera ruttneri</i> jirreferi għal kolonja ta' naħal.”</p>

Sfond: Bil-Malti nirreferu għal *Apis mellifera* bħala n-Naħla tal-għasel jew in-naħla. Għaldaqstant nipproponi dan li ġej:

Jemenda Skeda I tar-regolamenti prinċipali.

Skeda I tar-regolamenti prinċipali għandha tiġi sostitwita' b'din l-iskeda l-ġdida li ġejja:

“SKEDA I

SPEĊI NAZZJONALI TAL-GŻEJJER MALTIN

Skeda I(a): Speċi Nazzjonali (Għasafar)

ISEM XJENTIFIKU	ISEM BIL-MALTI	ISEM BL-INGLIŻ	SPEĊI NAZZJONALI
<i>Monticola solitarius</i>	il-merill; iċ-ċikkudiddiju	Blue Rock Thrush	National Bird

Skeda I(b): Speċi Nazzjonali (ħlief għasafar)

ISEM XJENTIFIKU	ISEM BIL-MALTI	ISEM BL-INGLIŻ	SPEĊI NAZZJONALI
<i>Aphanius fasciatus</i>	il-buzaqq	Mediterranean Killifish	National Fish
<i>Apis mellifera ruttneri</i>	in-naħla; in-naħla tal-għasel ta' Malta	Maltese Honey Bee	National Insect
<i>Palaeocyanus crassifolius</i> (= <i>Cheirolophus crassifolius</i>)	widnet il-baħar	Maltese Rock-Centaury	National Plant
<i>Potamon fluviatile lanfrancoi</i>	il-qabru; il-granċ tal-ilma ħelu	Maltese Freshwater Crab	National Invertebrate

L-ismijiet li se jkunu meqjusa għal fini ta' din il-proposta legali se jkunu in-naħla Maltija u n-naħla ta' Malta, li huma l-ismijiet l-aktar użati għal din in-naħla.

		<p><i>Tetraclinis articulata</i> (=<i>Callitris quadrivalvis</i>)</p>	<p>l-għargħar; is-sigra tal-għargħar</p>	<p>Arar Tree: Alerce; Sandarac Gum Tree</p>	<p>National Tree</p>	
		<p>Sfond: In-naħhal għandu jkun rikonoxxut bħala l-kustodju tan-naħal tal-għasel ta' Malta u dan għandu jkollu permess jagħmel dan kif imsemmi qabel skond S.L. 36.36. Għalhekk tajjeb li l-penali jinkludu wkoll x'jigri mill-liċenzji ġenerali jew permessi li jista jikseb l-individwu f'każ ta' reat. Għaldaqstant nipproponi dan li ġej:</p> <p>Jemenda Skeda II tar-regolamenti principali. "Penali għal reati fuq speċi imniżżla fl-Iskeda I(b)għajr <i>Apis mellifera ruttneri</i></p> <p>Jiżdied paragrafu speċifiku għall-<i>Apis mellifera ruttneri</i> kif ġej: Kull persuna li tikkommetti jew tipprova tikkommetti reat relatat man-naħal indikati fl-Iskeda I(b) jeħel meta jinstab ħati:</p> <p>(a) fil-każ tal-ewwel reat, multa ta'mhux inqas minn seba mija u ħamsin euro (€750) għal kull eżemplari, iżda mhux aktar minn ħamest elef euro (€5,000) għal kull eżemplari, flimkien mal-konfiska tal-<i>corpus delicti</i>.</p> <p>Il-Qorti għandha tordna wkoll is-sospensjoni ta' kull liċenzja ġenerali jew permess, maħruġ skont dawn ir-regolamenti, r-Regolamenti dwar it-Trobbija tan-Naħal għal perjodu ta' mhux anqas minn sentejn iżda mhux iżjed minn ħames snin.</p>			<p>Huwa meqjus li l-penali fil-liġi huma suffiċjenti f' dan ir-rigward.</p>	

	<p>(b) fil-każ tat-tieni reat jew reat sussegwenti, multa ta'mhux inqas minn elf u ħames mitt euro (€1,500) għal kull eżemplari iżda mhux aktar minn għaxart elef euro (€10,000) għal kull eżemplari, jew prigunerija għal żmien mhux inqas minn sitt xhur iżda mhux iżjed minn sentejn, jew dik il-multa uprigunerija flimkien mal-konfiska tal-<i>corpus delicti</i>.</p> <p>Il-Qorti għandha tordna wkoll ir-revoka permanenti ta' kull liċenzja ġenerali jew permess, maħruġ dawn ir-regolamenti, skont ir-Regolamenti dwar it-Trobbija tan-Naħal:</p> <p>Iżda l-Qorti tista', fid-diskrezzjoni tagħha, timpani fuq il-ħati, Ordni ta'Servizz fil-Komunità skont l-Att dwa ril-<i>Probation</i>:</p> <p>(ċ) Kull persuna li teqred jew tittanta li teqred jew tieġu jew tittanta li tieġu bejta jew kolonja ta' naħal elenkat fl-Iskeda l(b)mingħajr permess ġenerali validu għandha teħel il-pieni imnizzlin fil-paragrafu (b) u l-Qorti għandha ukoll tordna li l-persuna ħatja għandha tkun skwalifikata milli tikseb liċenzja ġenerali jew permess taħt ir-Regolamenti dwar it-Trobbija tan-Naħal għal għomorha, u meta dik il-liċenzja ġenerali jew permess tkun ġiet revokata b'mod permanenti skont il-paragrafu (b) jew il-Qorti tkun diġà ordnat li dik il-persuna ġiet skwalifikata milli takkwista l-liċenzja ġenerali jew permess għal għomorha, meta tinstab ħatja, dik il-persuna għandha teħel multa ta' mhux anqas minn sebat elef euro (€7,000) iżda mhux iżjed minn ħmistax-il elf euro (€15,000) u prigunerija għal żmien ta' mhux anqas minn sena iżda mhux iżjed minn sentejn.</p>	
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		(ċ) fir-rigward ta' reati li jikkonċernaw speċi indikati fl-Iskeda I(b), għandhom japplikaw sanzjonijiet addizzjonali, kif stabbilit taħt is-subregolamenti (5), (6) u (7) tar-regolament 49 tar-Regolamenti dwar il-Protezzjoni tal-Flora, Fawna u Ambjenti Naturali.	
10	Ray Sciberras 17/03/2024	<p>Whilst it is commendable that an initiative has been taken to elevate the apis mellifera ruttneri's status to become Malta's national insect, it does not make sense that whilst it is protected on paper, the honey bee (ruttner and/or other sub-species) as well as other pollinators have their natural habitats destroyed by uncontrolled development and other unchecked human actions. Climate change is already of great concern and effects the pollination density populations as well as their life cycles.</p> <p>Due to Malta's limited land size - once virgin forage areas as destroyed these cannot be replaced by concrete pollinator gardens with a few shrubs, despite the efforts and publicity. The biodiversity cannot be replaced with the lose of garrigue areas which are back filled with soil/torba in an effort to save on landfill expenses. Every square meter of such area destroyed, is an irreplaceable national loss, which future generations will never experience again. The lack of enforcement in this respect is unacceptable and an insult to this very proposed legislation.</p>	<p>Support of the Maltese Honey Bee as a national insect is noted.</p> <p>ERA has also noted the concerns mentioned and assures that it follows the relevant legal and policy provisions related to the environment. ERA notes that amongst others, the National Biodiversity Strategy and Action Plan to 2030 includes actions that address encompassing aspects related to biodiversity.</p> <p>Meanwhile, aspects that are of concern in terms of pollinators shall be considered as part of the drafting of the National Strategy and Action Plan for Pollinators to 2035 (NSAPP). The latter, combined with the ongoing Malta Pollinators Monitoring Programme (MPOMS) will highlight the importance of all pollinator species in Malta.</p> <p>The main intent of the NSAPP is to act as the national framework that drives and promotes the safeguarding of pollinator species and their services through a number of short and long-term actions. This policy shall aim to safeguard environmental elements, while also taking into consideration and contributing towards socio-economic aspects, and also helping local biodiversity continue to build its resilience towards climate change.</p>
		As one of Malta's leading full time beekeeper, I believe that this proposal is really a farce and only a cosmetic effort which does not give this pollinator any real protection, Scientific studies show that the local bee population only has some 6% DNA ruttneri traits left. Despite this, little effort has been done on a national level to improve stock levels and queen lines, using scientific methods. Over the years we have under our own steam, worked	<p>Your feedback is being noted. The ongoing Malta Pollinators Monitoring Programme (MPOMS) also aims to promote at a national level better understanding of all pollinator species in Malta.</p> <p>Although some of the cited aspects do not necessarily relate to this proposed legislation, the relevant feedback shall be considered as</p>

		<p>hard to improve our own queen lines, this using local colonies, However open mating makes it difficult to control, this particularly with foreign beekeepers specialising in queen bee rearing operating locally. Such operations should be halted immediately and other mating methods such as artificial insemination looked into. A serious national effort should be done to allowed to bring back the local bee traits, such programs take years of intense efforts. Such efforts require substantial investment as well as expertise. This is now being made even harder for us, as we are now unable to tap into Malta Council for Science and Technology (MCST) R&D funding due to NACE restrictions, since honey is an ANNEX 1, primary product and so now ineligible for such funding. Without such projects to revitalise this insect, it will only fade further into extinction and Malta will align itself with such countries as Scotland which has as it national animal - the Unicorn!</p>	<p>part of the drafting of the related National Strategy and Action Plan for Pollinators to 2035, including aspects linked with research and funding. This will be led by ERA in consultation with relevant entities, stakeholders and experts, and will also involve public consultation - to ensure that all pollinator species including the Maltese Honey Bee are sufficiently protected. Indeed, the designation of the Maltese Honey Bee will form part of a wider strategy to increase the public awareness of the value and integrity of pollinators to the Maltese economy, society and environment as a whole.</p>
11	<p>Michael Buhagiar</p> <p>Għaqda Produtturi tal-Għasel Malti</p> <p>18/03/2024</p>	<p>Aħna l-Għaqda Produtturi tal-Għasel Malti (VO/0432), formalment qed nibgħatu din l-ittra dwar il-proposta sabiex in-naħla Maltija tiġi meqjusa bħala insett nazzjonali, b'riżultat li tiġi elenkata fost il-fawna u flora selvaġġi ta' pajjiżna u l-impatt li dan jista jkollu fuq in-naħala u s-settur tal-apikultura.</p> <p>Fuq skala globali, n-naħal tal-għasel (honeybees) huma klassifikati bħala annimali agrikoli (livestock). Id-dipartiment tal-agrikultura sa min dejjem ħadem fuvur it-trobbija tan-naħla Maltija, kemm fit- tnessil u tkattir ta' irgejjen Maltin kif ukoll fl-istudju nnifsu li wassal għall-iskoperta ta' din is-sottospeċi prestigjuża. Ma' jidher li hemm l-ebda kwistjonijiet fejn jidhol it-titlu nnifsu dak tan-naħla bħala insett nazzjonali. Iżda, l-inklużjoni tan-naħla tal-għasel f'leġiżlazzjonijiet strutturati għall-protezzjoni ta' fawna u flora selvaġġi jista' jwassal għal implikazzjonijiet negattivi fuq is-settur tal-apikultura u attivitajiet kummerċjali relatati ma' dan is-settur.</p>	<p>Ir-Regolamenti kif proposti jissalvagwardjaw lis-settur tal-apikultura.</p>

	<p>B'din l-inizjattiva hemm riskju ta' zieda fil-burokrazija li tkompli żżid fuq id-diffikultajiet li diġà jiffaċċja is-settur tan-naħal u taqta' qalb in-naħhal milli jkompli b'dan il-mistier tant importanti mhux biss bħala xogħol tradizzjonali iżda anke minhabba d-dakra li toffri n-naħla b'xejn fuq l-uċuh agrikoli li minnhom nieħdu prodott frisk lokali. Protezzjoni żejda jaf tispicċa taħdem kontra u dan għaliex tiskoraġġixxi in-naħhala milli jrabbu n-naħla Maltija. Fl-aħħar mill-aħħar l-eżistenza ta' din in-naħla tiddependi totalment fuq in-naħhala lokali.</p>	<p>L-emendi fir-Regolamenti m'għandhomx iżidu fil-burokrazija. Infatti jinkludu <i>proviso</i> li jassigura li ma jkunx hemm burokrazija żejda għal min hu rreġistrat biex irabbi n-naħal skont id-dispożizzjonijiet tar-Regolamenti dwar it-Trobbija tan-Naħal (L.S. 36.36).</p>
	<p>Lkoll kemm aħna naqblu li n-naħla jisthoqqilha li tiġi mħarsa. Fl-opinjoni tagħna, mod ippruvat biex dan l-għan jintlaħaq huwa permezz ta' programm ta' tnissil selettiv (breeding programme) kif kien diġà pplanat li jsir fil-passat tant li nxtara apparat apposta tal-fertilizzazzjoni artifiċjali mill-Gvern, sabiex filwaqt li elementi ta' ġenetika mhux pertinenti għal dik Maltija tiġi mwarra, nkomplu intejbu l-karatteristiċi ta' din is-sottospeċi sabiex tkun aktar attrajenti għan-naħhala tagħna. Huwa fatt li f'Malta instabet preżenza għolja ta' ġenetika mhux pertinenti għall-dik Maltija minn studju riċenti li sar minn <i>Breeds of Origin</i>, biss m'hemm l-ebda lok għall-allarmizmu żejjed. Numru sostanzjali ta' pajjiżi jew reġjuni li kienu f'sitwazzjonijiet simili jew aghar minn tagħna llum il-ġurnata s-sitwazzjoni tant inbidlet li l-istess speċi ta' naħal li kien mhedded qed jiġi saħansitra esportat barra l-pajjiż u nholqot niċċa oħra fis-settur.</p> <p>Hemm, mekkanizmi legali oħra, li għandhom jitqiesu bħar-Regolament (UE) Nru 511/2014. Dan il-qafas legali jipproteġi speċi u razez awtoktoni Maltin u huwa aktar adattat għan-naħla Maltija. Bħala rappreżentati tas-settur agrikolu nissuggerixxu li n-naħla tkun inkluża fost r-rizorsi ġenetiċi flimkien ma' animalni agrikoli oħra diġà stabbiliti, fosthom il-baqar indiġeni Maltin u t-tiġieġa s-sewda.</p>	<p>L-ERA qed taħdem fuq Strategija u Pjan ta' Azzjoni Nazzjonali dwar id-Dakkara, li se tkun qed tinkorpora fiha daww l-aspetti rilevanti f'dan ir-rigward – b'konsultazzjoni mal-partijiet kollha rilevanti. Fost l-azzjonijiet jista' jkun hemm li għandu jkun msejjes pjan ta' azzjoni speċifiku dwar in-naħla ta' Malta.</p> <p>Barra minn hekk, filwaqt li ninnotaw li n-naħla ta' Malta hija diġà meqjusa bħala rizorsa ġenetika ta' Malta permezz tal-ligijiet eżistenti, ta' min iżid ukoll li għaddejja hidma addizzjonali minn entitajiet oħra, bħall-Ministeru għal Ghawdex, biex jissahħaħ il-pul ġenetiku tan-naħla Maltija.</p>

		<p>Pajjiżi li pproteġew n-naħal endemiku tagħhom bħall-Islovenja, Spanja u d-Danimarka, kollha użaw mezzi legali agrikoli oħra bħall-Att dwar it-trobbija tal-bhejjem u/jew ippjanar ta' segregazzjoni ta' reġjuni għall-protezzjoni. Illum għandna l-facilita li nistgħu nużaw diversi metodi ta' kontroll tat-tgħammir biex tiġi evitata l-kontaminazzjoni ġenetika fil-popolazzjoni tan-naħal tal-lokal minn naħal introdott. Metodi bħal dawn jinkludu mezzi kemm naturali kif ukoll artifiċjali.</p> <p>Aħna wkoll naqblu ma' dak li hu propost li n-naħala jkomplu bil-mistier tagħhom kif inhuma jgħamlu preżentament.</p> <p>Nittamaw li din it-talba tiġi milqugħa fl-ispirtu ta' djalogu konsultattiv biex tkun issalvagwardjata n-naħla Maltija kif ukoll is-settur tal-apikultura.</p>	
12	<p>Polina Venka BirdLife Malta 18/03/2024</p>	<p>BirdLife Malta is happy to learn about the initiative to declare the Maltese Honey Bee as a National Species. We trust such designation will provide further legal framework for better protection of the unique Maltese subspecies.</p> <p>Such designation will also support the Malta's National Strategy and Action Plan for Pollinators to 2035 for which the drafting process was launched by ERA last year. We call on ERA to encourage research to better understand the ecology, pressures, interlinkages and state of the Maltese Honey Bee in order to propose and implement the protection measures in future. At the same time, the lack of local data should not be used as a justification to further delay urgent actions, such as reducing the use of pesticides, prevention of genetic pollution due to hybridisation (through better control of imported bees), restoring damaged habitats and preventing inappropriate developments in pristine areas, encouraging the development of green infrastructure in urban areas, all of which shall have a drastic</p>	<p>Support of the Maltese Honey Bee as a national insect is noted.</p> <p>ERA is leading on the Malta Pollinator Monitoring Programme (MPOMS) which will serve to increase the baseline of information on pollinators at the national level. This data will in turn form the basis for developing the National Strategy and Action Plan for Pollinators to 2035 (NSAPP) and the associated policy actions and recommendations emanating from this Strategy.</p> <p>ERA shall seek to consider the other aspects mentioned, and this as part of the drafting of the NSAPP, which is underway and will be subject to various consultation stages as called for by the Environment Protected Act.</p> <p>Additionally, ERA notes that the National Biodiversity Strategy and Action Plan to 2030 includes actions that will address the use of pesticides in the context of sustainable agriculture and use of biodiversity. To this end, the NSAPP and NBSAP will be mutually</p>

		positive impact on the state of population of the Maltese Honey Bee and other pollinator species. Practical implications of the said Declaration should be a priority.	supportive in terms of addressing drivers of biodiversity loss including those aspects affecting pollinators.
13	<p>Dr M'Rose Micallef</p> <p>Assoċjazzjoni tan-Naħħala Malta</p> <p>18/03/2024</p>	<p>INTRODUZZJONI</p> <p>Email mibgħut minn l-Assoċjazzjoni fit-8 ta' Marzu 2024</p> <p>Dear Dr. Micallef,</p> <p>We already spoke several times on this subject regarding subsidiary legislation 549.120. https://legislation.mt/eli/sl/549.120/eng/pdf. On the 19th of February, a public consultation was launched by ERA which would be the competent authority. As an association representing stakeholders we are required to submit feedback by the 18th March.</p> <p>The association is requesting your service to provide a comprehensive review in this regard. Consequently, we will be in a better position for submitting opinions/concerns that might arise with the implementation of this legislation.</p> <p>Remarks:</p> <p>Article 8c) was improved not to have major impacts on apiculture. To this end we would like to see further into this and your opinion is being requested especially when it comes to legal terms and interpretation.</p> <p>Other articles that may have indirect effects on the apiculture sector were not amended. Such as article 7, which may be subject to incorrect interpretation. Other articles 10, 11, 12 describing the fines and imprisonment are also worrying.</p>	The introduction has been noted, and feedback is being provided below.

	<p>IL-PARIR Żiediet mal-Emendi Proposti A) B'riferenza għat-tifsira ta' "awtorità kompetenti" kif misjuba f'regolament 3 din tirreferi għal-regolament 4 li bħala Awtoritajiet kompetenti li huma mnsilla huma:-</p> <p>a) ERA u b) Taqsima tar' Regolamentazzjoni tal-Għasafar Selvaġġi</p> <p>Ma' dawn għandha tizzied l-awtorità kompetenti illi serja tkun l-awtorità li tħares il-protezzjoni etc tan-naħla Maltija.</p> <p>Suggeriment dwar l-'awtorità kompetenti' li għandha tirregola is-sengħa tan-naħal inkluż il-konservazzjoni tan-naħla Maltija – li din l-Awtorità tkun id-Direttorat tal- Agrikoltura kif imwaqqaf fil-Kapitolu 639 tal-Liġijiet Maltin.</p> <p>Fil-fatt il-Liġi diġa eżistenti, dwar it-trobbija tan-naħal (LS 36.36) twaqqaf t-trobbija tan-Naħal taħt id-Direttorat tal-Agrikoltura.</p>	<p>L-Awtorità kompetenti proposta sabiex tħares in-naħla ta' Malta bħala l-insett nazzjonali hija l-ERA, hekk kif preskritt fil-paragrafu (a) tar-regolament 4 tar-Regolamenti dwar il-Ħarsien ta' Speċi Protetti (Dikjarazzjoni ta' Speċi Nazzjonali) (L.S. 549.120) li huma ppromulgati taħt l-Att dwar il-Protezzjoni tal-Ambjent.</p>
	<p>B) Mat-tifsira "tar-regolamenti rilevanti" għandha tinkludi l-Kapitolu 639 tal- Liġijiet Maltin.</p>	<p>Dawn ir-Regolamenti huma msejsa taħt l-Att tal-Ambjent, Kap. 549. Ir-referenzi għall-liġi rilevanti tal-agrikoltura diġa mniżzla fit-test tal-liġi.</p>
	<p>Ċ) Regolament 9 proposta li tiddaħħal klawsola dwar li l-Awtorità għandha minn żmien għal żmien skont il-htieġa tal-konservazzjoni, tikkonsulta m'entitajiet rilevanti u kompetenti nazzjonijiet li jinkludu ukoll l-għaqdiet volontarji rilevanti.</p>	<p>Din il-proposta mhijiex qiegħda tiġi inkluża stante li l-liġi vigenti diġa tinkorpora li l-Awtorità kompetenti (jiġifieri l-ERA) tista' tippromwovi u tinkoraġixxi koperazzjoni xierqa ma' korpi u entitajiet nazzjonali.</p>
	<p>Kummenti oħra. Għadu ikun hemm liġi speċjali li tirregola it-trobbija tan-naħal per se. Fil-liġi tagħna diġa hemm liġi speċifika dwar dan li hija l-Legizlazzjoni Sussidjarja 36.36. Din il-liġi titratta dwar it-trobbija tan-naħal in ġenerali.</p>	<p>Il-kumment tiegħek qiegħed jiġi nnutat. Id-dikjarazzjoni tan-naħla ta' Malta bħala speċi nazzjonali qiegħda tiġi proposta taħt l-Att dwar il-Protezzjoni tal-Ambjent, Kap. 549, senjentament taħt ir-Regolamenti dwar il-Ħarsien ta' Speċi Protetti (Dikjarazzjoni ta' Speċi Nazzjonali) (L.S. 549.120) u dan sabiex l-ispeċi nazzjonali</p>

		<p>Din il-liġi tista tintuża ukoll sabiex ikun hemm regolamenti dwar il-konservazzjoni tan-naħla ta’ Malta fejn fiha ikun kollox miġbur tistabilixxi fost l-oħrajn:-</p> <ol style="list-style-type: none"> It-tip ta’ naħal li jista’ jiġi imrobbi f’Malta. Il-liċenzja li tingħata lin-naħhal. (li timponi ukoll dwar kif wieħed jista’ jiksibha). L-obbligi tan-naħhala. L-Awtorità li għandha sservi bħala regolatur. Il-pieni ta’ ksur tal-liġi. Liġijiet dwar il-konservazzjoni in ġenerali tan-naħal malti. <p>Suġġeriment sabiex din il-liġi taqa’ bħala leġislazzjoni sussidjarja taħt il-Kapitolu 639 tal-Liġijiet Maltin. Il-funzjonijiet li qegħdin jiddaħhlu fl-emendi tal-549.120 (dwar it-trobbija tan-naħal) għandhom jiġu inkorporati f’din il-liġi.</p>	<p>jkunu miġbura kollha f’lista waħda. Aspetti oħrajn huma rregolati b’ liġijiet separati. Fl-istess waqt, l-ERA qed taħdem fuq Strategija u Pjan ta’ Azzjoni Nazzjonali dwar id-Dakkara, li se tkun qed tinkorpora fiha dawk l-aspetti rilevanti f’dan ir-rigward.</p>
14	Breeds of Origin Conservancy 18/03/2024	<p>Nirringrazzjaw lill - MAFA, MEER flimkien ma l -ERA, li għamlu evalwazzjoni fuq tal – liġi attwali u fasslu l – emenda fil - liġi’ ta’ paragrafu (ċ) tar-regolament 8</p> <p><i>“10. Kwalunkwe valutazzjoni mwettqa jew permess maħruġ mill-awtorità kompetenti skont irregolamenti rilevanti għandhom jitqiesu bħala maħruġa taħt dawn ir-regolamenti: S.L. 36.36. S.L. 549.44 Iżda għall-Apis mellifera ruttneri, kull registrazzjoni skont ir-Regolamenti dwar it-Trobbija tanNaħal li tinvolvi l-użu ta’ din l-ispeċi għall-produzzjoni ta’ għasel, ġelatina rjali, propolis, xema’ tan-naħal jew prodotti oħra relatati man-naħal tal-għasel, għandha titqies bħala permess validu taħt dan ir-regolament u taħt ir-Regolamenti dwar il-#arsien tal-Flora, Fawna u Ambjenti Naturali.”</i></p> <p>L-organizzazzjoni volontarja 'Breeds of Origin Conservancy' taqbel li in – naħla Maltija għanda tiġi imħarsa b'mod għaqli u minajr ebda detriment fuq - settur tal - apikultura.</p>	<p>Il-kumment dwar il-qbil li n-naħla ta’ Malta għandha tkun imħarsa b’mod għaqli ġie nnutat.</p>

		<p><u>Żiediet mal-Emendi Proposti</u></p> <p>A) B’riferenza għat-tifsira ta’ “awtorità kompetenti” kif misjuba f’regolament 3 din tirreferi għal-regolament 4 li bħala Awtoritajiet kompetenti li msejja huma:-</p> <p>a) ERA u b) Taqsima tar’ Regolamentazzjoni tal-Ghasafar Selvaġġi</p> <p>Ma’ dawn għandha tizzied l-awtorità kompetenti (mhux l-ERA) illi se tkun l-awtorità li tħares il-protezzjoni tan-naħla Maltija.</p> <p>Suġġerimenti – li din l-Awtorità tkun id-Direttorat tal-Agricoltura kif imwaqqaf fil-Kapitolu 639 tal-Liġijiet Maltin.</p> <p>Il-Liġi dwar it-trobbija tan-naħal (LS 36.36) twaqqaf t-trobbija tan-Naħal taħt id-Direttorat tal-Agricoltura.</p>	<p>L-Awtorità kompetenti proposta sabiex tħares in -naħla ta’ Malta bħala l-insett nazzjonali hija l-ERA, hekk kif preskritt fil-paragrafu (a) tar-regolament 4 tar-Regolamenti dwar il-Ħarsien ta’ Speċi Protetti (Dikjarazzjoni ta’ Speċi Nazzjonali) (L.S. 549.120) li huma ppromulgati taħt l-Att dwar il-Protezzjoni tal-Ambjent.</p>
		<p>B) Mat-tifsira “tar-regolamenti rilevanti” għandha tinkludi l-Kapitolu 639 tal-Liġijiet Maltin.</p>	<p>Dawn ir-Regolamenti huma msejsa taħt l-Att tal-Ambjent, Kap. 549. Ir-referenzi għall-liġi rilevanti tal-agrikultura diġà mnizzla fit-test tal-liġi.</p>
		<p>C) Regolament 9 proposta li tiddaħhal klawnsola dwar li l-Awtorità għandha minn żmien għal żmien skont il-ħtieġa tal-konservazzjoni, tikkonsulta m’entitajiet rilevanti u kompetenti nazzjonijiet li jinkludu ukoll l-għaqdiet rilevanti.</p>	<p>Din il-proposta mhijiex qiegħda tiġi inkluża stante li l-liġi viġenti diġà tinkorpora li l-Awtorità kompetenti (jiġifieri l-ERA) tista’ tippromwovi u tinkoraġixxi koperazzjoni xierqa ma’ korpi u entitajiet nazzjonali.</p>
15	<p>Vince Buhagiar</p> <p>Kummissjoni Interdjocesana Ambjent</p> <p>18/03/2024</p>	<p>Il-pożizzjoni tal-Kummissjoni Ambjent (KA) hija li ma taqbilx mal-inizjattiva li n-naħla Maltija <i>Apis mellifera ruttneri</i> (AMR) tiġi kklassifikata bħala l-Insett Nazzjonali.</p> <p>L-għaqdiet tan-nahhal qed jaqblu illi n-naħla Maltija għandha tiġi protetta b’mekkaniżmi oħra iktar għaqlin fosthom programm ta’ tnissil selettiv fejn verament tista’ tissaħħaħ l-AMR. Tista’ wkoll</p>	<p>Dawn ir-regolamenti ġew proposti sabiex in-naħla Maltija tiġi ddikjarata bħala insett nazzjonali u allura tingħata protezzjoni oġhla u tgawdi minn iżjed għarfien. It-test kif propost jissalvagwardja lil min hu rreġistrat sabiex irabbi n-naħal skont id-dispożizzjonijiet tar-Regolamenti dwar it-Trobbija tan-Naħal (L.S. 36.36). Tali protezzjoni m’għandhiex tkun ikkunsidrata bħala xkiel għal-liġijiet u <i>policies</i> oħrajn inkluż dawk agrikoli; anzi dawn għandhom jikkumplementaw lil xulxin.</p>

		<p>tigi miżjuda bħala rizorsa ġenetika oħra, fost annimali oħrata' valur agrikolu.</p> <p>Dan tal-aħħar huwa qafas legali li huwa diġà eżistenti, li jipproteġi annimali awtoktoni bħalma għandna diġà, per eżempju, il-baqra, il-mogħża u t-tigieġa Maltija. Dawn l-ispeċi huma protetti taħt ir-responsabilità u l-kompetenza unika tal-Ministeru tal-Agricoltura.</p> <p>Mill-banda l-oħra, jekk in-naħla ssir insett nazzjonali dan ifisser li awtomatikament in-naħla taqa' taħt il-kompetenza tal-Ministeru tal-Ambjent (jigifieri l-ERA) u minħabba f'hekk tibda taqa' taħt ir-regolament S.L.549.120. Jekk iseħħ dan, il-liġi taf tkun ta' detriment u xkiel għan-naħal Malti, li trazznu milli jkompli jindokra l-istess naħla Maltija (AMR), li apparti l-prodotti li tagħtina, kif jaf kulhadd, din tagħti sehem ewlieni fid-dakra tal-prodott agrikolu.</p> <p>Il-konkluzjoni aħharija kienet li l-liġi sussidjarja S.L.549.120 hija strutturata għall-protezzjoni ta' speċi li jgħixu fis-selvaġġ (wildlife), li iżda dawn ma għandhom l-ebda valur agrikolu.</p> <p>Għaldaqstant ma tkunx għażla għaqlija li n-naħla Maltija titqies bħala l-insett Nazzjonali, għall-protezzjoni sħiħa, peress li din għandha funzjonijiet agrikoli, jigifieri li tirrendi prodott għall-konsum jew l-użu tal-bniedem (harvested products and derivatives). Fost dawn hemm l-għasel, il-propolis, ix-xema', ir-<i>'Royal Jelly'</i>, kif ukoll it-tnissil artifiċjali tan-naħla stess.</p>	<p>L-ERA qed taħdem fuq Strategija u Pjan ta' Azzjoni Nazzjonali dwar id-Dakkara, li se tkun qed tinkorpora fiha dawk l-aspetti rilevanti f'dan ir-rigward – b'konsultazzjoni mal-partijiet kollha rilevanti. Fost l-azzjonijiet jista' jkun hemm li għandu jkun msejjes pjan ta' azzjoni speċifiku dwar in-naħla ta' Malta.</p>
16	Anonymous 18/03/2024	<p>What is the scope of having a national species if it's not protected from foreign honeybees, which are alien invasive species mating with it and contaminating its genes, thus rendering it non-Maltese? This is just a superficial law, no protection whatsoever will be given to the Maltese honeybee.</p>	<p>Through the designation of the Maltese Honey Bee as a national insect, it will be protected through the Regulations already in place for other national species. Further steps will be considered as deemed relevant, also in terms of the National Strategy and Action Plan for Pollinators to 2035, work on which is currently underway.</p>

Comments submitted during stakeholder consultation meeting on 13th March 2024

1	Rodney Galea	There are people who collect the swarms of bees and make a business out of them. Can ERA make it a point that the swarms are collected only by beekeepers who actually keep them and not by pest controllers, as no one knows what they do with them?	The proposed text addresses this concern when the swarm is of the Maltese Honey Bee. With respect to collection of swarms of other subspecies, whilst acknowledging that this is a valid concern from a bee-keeping perspective, it does not fall within the scope of these regulations. In this regard, this comment has been discussed with the relevant competent authority.
	Għaqda Trobbija tan-Naħal u Għasel Malti	With the new law coming into force, and taking into account the beekeeper, with regards to quality of honey and mark of quality, can things be done differently from how the law is written, and will ERA change the law in the future?	The law does not stipulate this; however, regarding the mark of quality, this has to be discussed with the relevant Ministry.
	13/03/2024	Għaqda Trobbija tan-Naħal u Għasel Malti is in the process of having honey and bees with the mark of quality and will soon get in touch with MCCA since the paper has reached the briefing process. Can the Maltese Honey Bee be included in this paper?	This new proposed law will not hinder such suggestion to include the Maltese Honey Bee in the paper.
2	Jan Proschek Earth Systems Association 13/03/2024	Does ERA intend to organize an association based on the restoration and conservation of the bee and any other pollinators?	ERA is working with another entity and a number of volunteers. In fact, in 2023, an initiative named Malta Pollinator Monitoring Scheme (MPOMS) was set up and issued a call for volunteers to work with ERA to monitor pollinators, namely bees, butterflies and hoverflies. This process is intended to continue further and anyone who wishes, can be involved in the process. A number of site visits by ERA and volunteers were made in order to sustain the National Strategy and Action Plan for Pollinators to 2035.
3	Thomas Galea Breeds of Origin Conservancy 13/03/2024	Is the Abattoir Permit valid for beekeepers? Is a registered beekeeper then exempt from this proposed new law?	If someone is growing bees with an agricultural license, no law is being broken as the activity will be permitted and it is considered as if you have the permission given by this proposed new law. There is no risk of going to Court or being fined if adhering to the law.

4	Martin Galea De Giovanni Friends of the Earth Malta 13/03/2024	There should be more protection to beekeepers during events of vandalism, for example, someone burns someone's honeycomb, and the person should be penalised. Since the Maltese Honeybee has already been protected since 2003, is this proposed new law sort of an added protection?	Since it will now become a national species, the penalties incurred from the law of the national species are more severe since the Maltese Honeybee will now become a cultural symbol of the country.
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