



Public Consultation Submissions & Responses

National Biodiversity Strategy and Action Plan (NBSAP) to 2030

March 2023

Environment & Resources Authority



CONSULTATION FEEDBACK

| Ref No. | Name of Stakeholder / Date | Comments Received | Response / Remarks |
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| 1 | Malta Council for Science and Technology 28/03/2023 | As a whole, MCST looks favourably on the National Biodiversity Strategy and Action Plan to 2030 and approves of its goals towards a holistic strengthening of Malta's ecosystem, the protection and recovery of our native biodiversity and the push for more robust monitoring and protection mechanisms. MCST also deeply approve of the focus that this Strategy puts on the role of citizen science, knowledge generation and sharing, technical and scientific cooperation as well as ecologically-aligned innovation. With respect to the Consultation, MCST would like to put forward two recommendations in order to clarify areas of the text with unclear ownership and to identify the importance that the data generated from these efforts are accessible by the broader scientific community; | Comments and recommendations have been duly noted. |
| | | With respect to research carried out and monitoring infrastructure set up, MCST recommends that efforts are made to promote their wider availability and accessibility to the academic community for the benefit of broader ecology-oriented R&I. Relevant Actions: 2.4, 2.9, 4.3, 4.4, 10.1, 19.4 | ERA acknowledges the importance of availability and accessibility of studies and information to the academic community, and makes them available as relevant and appropriate. Moreover, ERA stands ready to collaborate with research institutions, as highlighted in Action 19.1. |
| | | With respect to the carrying out of related research by third parties, we recommend that the entities responsible are outlined more clearly in the text and that Research Performing Organizations (RPOs) are defined as the primary agents in this regard. Relevant Actions: 18.1, 19.1 | The Actions do not specify responsible entities and Research Performing Organisation (RPOs) so as to accommodate for different arrangements with different actors, while leaving room for new partnerships and initiatives to be developed according to need. |
| 2 | Institute of Earth Systems, University of Malta 28/03/2023 | <p>Introduction</p> <p>This document comprises the official feedback being submitted in March 2023 by the Institute of Earth Systems (IES) of the University of Malta (UM) in response to the publication by the Environment and Resources Authority (ERA) of the public consultation draft of the National Biodiversity Strategy and Action Plan (NBSAP) to 2030.</p> <p>The areas of expertise of the academics whose contributions are included within this document are as follows:</p> <ul style="list-style-type: none"> • Biodiversity conservation • Ecology | Comments are duly noted. |

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| | | <ul style="list-style-type: none"> • Environmental planning • Human-nature relationships • Landscape conservation • Rural communities • Soil management • Urban agriculture <p>General comments</p> <p>The vision and mission of the proposed NBSAP to 2030 are very much in line with the country’s needs. It is very positive to see that the strategy recognises the importance of good governance and of whole-of-government/whole-of-society approaches, given that the considerable biodiversity-related challenges facing the country cannot be adequately addressed solely through ERA’s efforts.</p> <p>The policy areas are generally comprehensive, and the proposed actions and targets are largely appropriate. However, some specific recommendations follow.</p> | |
| | | <p>Policy Area 1: Conserving and Restoring Nature</p> <p>Target 1</p> <p>Action 1.4 is much needed, given issues both locally and internationally with poor effectiveness of the management of protected areas. However, there needs to be a clearer link between the results of evaluations carried out through Action 1.4 and the revision of conservation objectives and measures proposed through Action 1.2. There also needs to be a clear commitment to accountability and transparency across both these measures – both in defining who is responsible for carrying out a measure and in evaluating the success of measures carried out.</p> | <p>ERA concurs with the importance of periodic management effectiveness evaluations of Natura 2000 sites, and hence its inclusion in the NBSAP.</p> |
| | | <p>In particular, it is crucial that some form of ‘yardstick’ is used to measure management effectiveness, and there exist various appropriate indicators that can be employed for this task. In the event that a set of indicators is devised, it is likewise important that success is not measured on a one-off occasion merely to acquire a snapshot of status; rather, an ongoing process of monitoring into the medium term is encouraged.</p> | <p>Action 1.2 highlights that conservation objectives and measures are to be revised as necessary; this necessity may arise through the process of management effectiveness.</p> |

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| | | <p>In line with actions proposed under Policy Area 5, there should also be a commitment for management effectiveness evaluation results to be publicly available.</p> | <p>In relation to the comment in relation to actions proposed under Policy Area 5, much as ERA is responsible for evaluating the success of all the actions under the 5 Policy Areas, it is also responsible for reporting on the national progress to the UN Convention on Biological Diversity Secretariat. These national reports are and will remain to be publicly available.</p> |
| | | <p>Target 2 While the importance of Natura 2000 sites and species/habitats of Community Interest is fully recognised, it should also be acknowledged that there are features of local conservation concern that do not necessarily fall under these categories. This should be made more explicitly clear in the wording of this target.</p> | <p>ERA agrees that there are features of local conservation that do not necessarily fall under species and habitats of Community Interest. In fact, Target 2 opens with the emphasis on the conservation of “ecosystems, including their key habitats and species”. This goes beyond species and habitats of Community Interest.</p> |
| | | <p>Related to this, there should be an action that sets a clear target for delivery of an updated Red List for the Maltese Islands. The Red Data Book for the Maltese Islands was last published in 1989. Since then, notwithstanding the hard work by ERA professionals, the impact of development across the country has continued to fragment Malta’s biological resources into ecological refugia, and numerous species have likely become extirpated with numerous others on the verge of eradication. These refugia are often too small to maintain even a minimum viable population (MVP), which is detrimental to the positive conservation outlook for any species that is not ubiquitous.</p> | <p>ERA recognises the need to update the red data lists, and is currently working on such update so as to fulfil Action 19.3.</p> |
| | | <p>An additional recommended action under this target would focus on the wider context of Natura 2000 sites. The focus of the Habitats and Birds Directives on habitats and species does not fully reflect their dependence on the broader environmental setting (including abiotic factors), and this may lead to the proposed conservation targets and measures falling short of the expected results. The safeguarding of relevant geological, geomorphological and hydrological aspects should therefore be explicitly considered under this target.</p> | <p>ERA acknowledges the importance of safeguarding the relevant geological, geomorphological and hydrological aspects. ERA construes this to be addressed under Action 5.3 which focuses on landscapes and landscape characteristics. Moreover, hydrological aspects are also addressed under Action 2.8.</p> |
| | | <p>It is the landform (or geomorphology) that provides the setting for any abiotic habitat, in which the myriad of natural processes such as soil formation, sedimentation, vegetation establishment and growth, dispersal mechanisms across terrain for metapopulations, and foraging, nesting and shelter within a species’ home range can take place. It is a major flaw of the Natura 2000 initiative that landform and associated dynamics, including hydrology, have</p> | <p>Regarding Natura 2000, it is worth noting the variety of sites forming part of this network across the islands, encompassing different natural elements including but not limited to water bodies, cliffs, screes, islets and a doline.</p> |

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| | | <p>been omitted, when they are probably as vital as ecology to the conservation of biological diversity.</p> | |
| | | <p>Action 2.3 refers to the identification of ecological corridors; the action should ideally define more clearly what species groups these corridors are intended for. The notion of greenways or ecological linkages in the form of corridors, stepping-stones, etc. is crucial for conservation. However, the habitat requirements for different groups are likewise diverse. If such initiatives are to lead to meaningful interventions, it is therefore vital that species and their individual behavioural characteristics are well researched in association with a given habitat.</p> | <p>With respect to ecological corridors, ERA agrees that habitat requirements for different groups are diverse and therefore ecological corridors will vary depending on the species. This will be taken into consideration during the implementation of Action 2.3.</p> |
| | | <p>Action 2.5 sets a target date of 2027 for initiating implementation of a framework on pollinators. This is very late given the urgency of the matter, and it is inadvisable to allow another three years of environmental devastation, which is taking place at an unprecedented rate, before any tangible action is implemented. The target date is also only three years short of the proposed end date of this strategy, and this date should be brought forward in order to reflect greater ambition in addressing pollinator decline.</p> | <p>With respect to Action 2.5, it should be noted that work towards the development of Malta's National Strategy and Action Plan for Pollinators (NSAPP) to 2035 has already started. However, the current extensive data gaps provide a barrier in understanding the current status and trends of pollinator species and to develop meaningful policy. Therefore, ERA, together with the University of Malta, the Malta College of Arts, Science and Technology (MCAST) and SPRING Project have meanwhile launched the Malta Pollinator Monitoring Scheme (MPOMS).</p> |
| | | <p>Any action plan concerning the environment and biodiversity must consider the importance of the soil, and it is encouraging that the development of a national policy that protects, enhances and monitors soil is included in Action 2.6. It is essential, however, that the function and dynamics of local soil are fully investigated and understood before such a policy is drafted; organic matter mineralisation, nitrogen transformation and soil losses are among the areas which urgently require further research. Also crucial is the constant monitoring of soil health once soil protection policies have been established and implemented. An education campaign to tackle the lack of public awareness of the importance of soil should also be considered.</p> <p>Recommendations for soil protection in the natural environment include minimising erosion by maintaining and promoting adequate vegetation cover, reducing the threat of compaction, reducing sealing, and preventing pollution of sensitive areas.</p> <p>The inclusion of separate measures for soil preservation in the natural environment (within this target) and in the agricultural environment (Target</p> | <p>With respect to Actions related to soil, the comments are duly noted and will be considered during the implementation of the relevant actions.</p> |

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| | | <p>10) is positive, given the different management needs involved. It is suggested that this strategy also considers soil of the urban environment.</p> | |
| | | <p>Target 3 In the case of Action 3.1, restoring degraded ecosystems “in line with environmental principles” will require substantial research given the dearth of experience with and data on ecosystem restoration locally. A partnership with the University of Malta may therefore be beneficial and should be explicitly noted, both in this action and in Action 3.2 for nurseries and botanic gardens. This recommendation has the potential of providing an ideal partnership situation wherein specialist knowledge at the University can be combined with regulator input for a win-win scenario.</p> | <p>Partnership with research institutions is of utmost importance, not only in the case of ecosystem restoration, but also in a wide range of areas. Hence, ERA has proposed Action 19.1 to act as a catch-all action that addresses research and pilot studies that improve the understanding of biodiversity. In this regard, it is also worth noting that ERA has already facilitated research with the University of Malta and the Malta College of Arts, Science and Technology through Memoranda of Understanding.</p> |
| | | <p>Action 3.4 – while the need to plant indigenous trees is recognised, removal of invasive alien species (IAS) should be done sensitively and only when there is clear net gain. It must be recognised that IAS, despite their alien status, can nonetheless provide important ecosystem services and that insensitive removal may cause more harm than good. Some non-native trees have been in-situ for numerous decades, and it is highly likely that a suite of faunal species have, over this time, become dependent on the micro-habitat that the trees provide. A case in point is the chafer beetle (<i>Anoxia matutinalis</i>) which thrives within the <i>Arundo donax</i> stand at Għadira. Removal of this stand would thus lead to the potential extermination of the Għadira population of the beetle.</p> | <p>Comment regarding Action 3.4 has been duly noted and will be taken into consideration during the implementation of the action. As for invasive alien species, these are one of the main threats to biodiversity and the related ecosystem services. As there are a number of invasive species within the Islands, priority for management is given to IAS of Union or local concern or specimens that have invaded protected or sensitive areas. Moreover, the eradication of certain non-native species that are widely spread, such as the <i>Arundo donax</i>, is not usually feasible or possible and instead containment and control measures would be applied where and as relevant.</p> |
| | | <p>Policy Area 2: Addressing the drivers of biodiversity loss Target 5 Action 5.1 is weak when considering that poor planning decisions are a major driving force of biodiversity loss. Stronger mechanisms for influencing planning decisions need to be sought. In particular, ERA should have the privilege of a veto where the natural environment is concerned. Unless such a measure is taken on board, the environment will remain at the mercy of the profit-making few, to the detriment of future generations and their right to enjoy benefits such as the aesthetic, spiritual and feel-good factors the environment can provide.</p> | <p>In relation to Action 5.1, the competent authority for spatial planning, including marine spatial planning and integrated coastal zone management, is the Planning Authority as per the Development Planning Act (Cap. 552). This Act provides for the consideration of environment as part of planning decisions.</p> |

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| | | <p>Action 5.2 – a further consideration should be whether any follow-up will take place relating to the proposed systematic monitoring of implementation and effectiveness of EIA and AA recommendations. In other words, will there be any consequences if recommendations are found not to have been followed? In addition, the disadvantage of having recommendations presented via EIA or AA reports is that such studies tend to present a snapshot situation of a restricted Area of Study, even if the report’s recommendations are adhered to faithfully.</p> | <p>Comments regarding Action 5.2 are duly noted and will be taken into consideration during the implementation of the action.</p> |
| | | <p>Action 5.3 – Malta is the only signatory state not to have ratified the European Landscape Convention (ELC) which provides a holistic framework for landscape conservation, planning and management. Given that landscape is an integrative concept and that it makes little sense to conserve only characteristics that are “significant...for the conservation of biodiversity”, a specific action under this target should be to ratify the ELC, followed by an update of the now-outdated Landscape Assessment exercise. Given that there is absolutely no reasonable justification for not ratifying the Convention, it is understandable why the idea of ‘trading in influence’ tends to gain traction locally among critics.</p> | <p>An assessment for the ratification of European Landscape Convention is ongoing.</p> |
| | | <p>Target 7 The Actions proposed under Target 7 do not show sufficient ambition, particularly given the urgent need to establish opportunities for nature contact in the heavily-urbanised Maltese context. A generic commitment to greening initiatives is vague and also does not adequately consider inequities (and related injustice issues) pertaining to nature access. In addition, it is pertinent to note that greening in the Maltese context is taken to mean the planting of trees, when it is grasslands that, in reality, are more biodiversity rich.</p> | <p>Although the actions under Target 7 might be viewed as general commitments, it should be noted that the implementation of these actions comprises amongst others the investment of €700 million towards environmental projects through the new agency, Project Green. Moreover, one has to keep in mind the strategic nature of this policy document, which encompasses all greening efforts, at a national scale, over the coming seven years.</p> <p>With respect to grasslands, it should be noted that these would be addressed under Targets 2 and 3, while ecological connectivity and coherence is also captured under Action 7.2.</p> |
| | | <p>Target 8 Actions 8.6, 8.7 and 8.8 are positive but it is not clear how successful implementation can be ensured given lack of clarity on how these provisions will be enforced. The poor track record in addressing noise/light pollution issues even within Natura 2000 sites (such as Comino) does not inspire confidence. There is a perception that enforcement in connection with any type of infringement tends to be undertaken with reluctance, probably because of the spectre of political interference and hindrance.</p> | <p>ERA’s Compliance and Enforcement Directorate serves a crucial function within the Authority and carries out numerous enforcement and compliance activities; indeed, there has been enhanced capacity building in this regard. Moreover, Target 21 of the proposed NBSAP also provides that ‘By 2030, compliance with and enforcement of biodiversity-related legislation is strengthened to ensure more timely and effective interception and deterrence of illegalities’.</p> |

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| | <p>Notwithstanding the fact that enforcement is a thankless job, it is an important responsibility of the Agency that requires to be carried out without fear or favour.</p> | |
| | <p>Policy Area 3: Using biodiversity sustainably Target 9 This is much needed given known instances of the keeping of wild animals in Malta clearly in breach of the Directive’s requirement to ensure that animals are kept under conditions which satisfy their “biological and conservation requirements”. The action should also safeguard against makeshift token conservation programmes that only seek to lend a thin veneer of credibility to zoos that are first and foremost money-making or capricious enterprises.</p> | <p>Comments are duly noted and will be taken into consideration during the implementation of the actions.</p> |
| | <p>Target 10 Cultivation reduces biodiversity within the soil, and the need for proper agricultural soil management should be emphasised. It is therefore essential to ensure that the management agreements under Action 10.2 include measures to keep salinity and sodicity levels low, reduce erosion, increase organic carbon reserves, promote conservation tillage, encourage intercropping, and reduce contamination.</p> | <p>Comments are duly noted and will be taken into consideration during the implementation of the actions.</p> |
| | <p>It is noted that there is no clear mention of the direct involvement of the farming community, and of the need to educate land users, particularly farmers, in how to protect and safeguard biodiversity through good agricultural practices and through the use of artificial intelligence to predict crop/animal needs. There is a clear need for training and hands-on practice in this regard.</p> | <p>The involvement of the farming community is captured to different degrees through the implementation of Malta’s CAP Strategic Plan (Action 10.1), management agreements with farmers (Action 10.2), synergistic partnerships with relevant cooperatives and associations (Action 18.2), efforts to preserve and transfer traditional knowledge (Action 19.4) and Target 17 on communication, education and public awareness.</p> |
| | <p>Target 13 The proposed actions under Target 13 could go much further in advancing an understanding and appreciation of the value of biodiversity for health. Additional actions could focus specifically on (i) research into the health and social benefits of nature contact and (ii) research into possible implementation of nature-based therapy programmes locally.</p> | <p>It should be noted that a catch-all research action (Target 19.1) is intended to cover a range of research topics.</p> |
| | <p>There appears to be an error within this section, in that the text of Action 13.3 exactly repeats the preceding Action 13.2.</p> | <p>Meanwhile, as noted in this comment there is an oversight in Action 13.3, which in fact should address the development of biodiversity indicators to enable the integration of biodiversity in wellbeing and quality of life indices and assessments. This will be updated accordingly.</p> |

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| | | <p>Action 13.4 is positive, and country walks with minimal impacts on biodiversity should be encouraged, with the proviso that access to certain sensitive areas may be prohibited so as to reduce anthropogenic impact on wildlife.</p> | <p>Comment has been duly noted and will be considered during the implementation of Action 13.4.</p> |
| | | <p>Target 17 Action 17.2 should more explicitly commit to going beyond teaching about sustainability to ensuring that all children have the opportunity for frequent and meaningful interaction with nature through, for example, nature-based learning programmes. This is fundamental to ensuring that future generations develop meaningful nature connectedness, and for this to occur, open green spaces need to be safeguarded scrupulously.</p> | <p>Comment has been duly noted and will be taken into consideration during the implementation of Action 17.2.</p> |
| | | <p>Target 18 Partnerships with researchers from relevant entities of the University of Malta are strongly recommended within the citizen science projects proposed under Action 18.1.</p> | <p>When it comes to citizen science projects, ERA welcomes partnerships with different entities, organisations, and groups, including with researchers. Indeed, ERA has already partnered with the University of Malta, as well as with the Malta College of Arts, Science and Technology, for the Malta Pollinator Monitoring Scheme (MPOMS) citizen science project.</p> |
| | | <p>Target 19 Similarly as for the actions under Targets 3 and 18, partnership with the University of Malta would be beneficial in connection with Action 19.1 and should be explicitly noted. The support of such research through funding and incentives to researchers is recommended. It is strongly recommended that the National Biodiversity Database to be established under Action 19.3 be accessible to researchers.</p> | <p>It is worth noting that ERA has already facilitated research with the University of Malta and the Malta College of Arts, Science and Technology through Memoranda of Understanding. Additionally, with respect to Action 19.1, ERA has made reference to “research institutions”, which would naturally include the University of Malta, whilst including other research institutions.</p> <p>As for the National Biodiversity Database, this is envisaged to be publicly available.</p> |
| 3 | <p>Marthese Cassar Gozo Regional Development Authority 28/03/2023</p> | <p><u>National Biodiversity and Strategy and Action Plan to 2030 feedback by the Gozo Regional Development Authority</u> <u>Introduction</u> As highlighted within the National Biodiversity Strategy and Action Plan to 2030, biodiversity needs to be safeguarded due to the ecosystem value it provides and also for its intrinsic value. The Gozo Regional Development Authority is broadly in agreement with the targets and actions in order to minimise the threats and loss of biodiversity. However, it is important, that more concrete measures will follow this strategy, in order to determine exactly how the mentioned targets will be reached.</p> | <p>Comments are duly noted. Whilst keeping in mind the strategic nature of this policy document, it should be emphasised that the development of the strategy does not end here. Further consultations with stakeholders will be held to discuss concretely how actions will be implemented and to develop specific indicators to measure progress.</p> |

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| | <p><u>Gozo’s perspective and the Regional Development Strategy for Gozo</u></p> <p>Over the past years, Gozo has registered a marked increase in population, which resulted in an increase in build up areas, as well as a rise in registered vehicles. This resulted in some loss of biodiversity, either directly by negatively effecting species or indirectly by damaging the habitats. The draft Regional Development Strategy for Gozo focuses on various measures, under different priority areas, which support and encourage biodiversity protection. Such measures include:</p> <ul style="list-style-type: none"> • The rehabilitation of valleys, which are pristine areas, home to unique biodiversity • The promotion of sustainable farming, even amongst the younger generations since this is essential for thriving biodiversity • The re-introduction of Gozitan livestock species • The preservation of the Maltese honey-bee species • Targeting waste and light pollution • Mitigating climate change through promoting sustainable mobility and green buildings, encouraging new renewable sources of energy, as well as, promoting afforestation areas, opening green public spaces and people centred streets. • Controlling invasive species, which are of threat to local biodiversity • Urban planning | <p>ERA welcomes measures in the Regional Development Strategy for Gozo that contribute to the targets and actions of the NBSAP. ERA looks forward to collaborating with all entities to strengthen synergies.</p> |
| | <p><u>Mitigating climate change</u></p> <p>As highlighted, one main threat for biodiversity is climate change. Gozo was recently chosen for the EU Mission “100 climate-neutral and smart cities by 2030”, a fund under Horizon Europe. The aim of this mission is to have 100 climate neutral and smart cities by 2030, an ambitious target of the European Green Deal and in line with the EU’s commitment to global climate action under the Paris Agreement. Through this mission, Gozo, through the Gozo Regional Development Authority, will receive technical advice and assistance from the Mission Platform (managed by the NetZeroCities consortium), which</p> | <p>ERA acknowledges that the recognition of the interlinkages between climate change and biodiversity is of utmost importance. ERA looks forward to collaborating together with entities working towards the mitigation and adaptation measures that integrate nature-based solutions and avoid negative impacts on biodiversity.</p> |

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| | | <p>will lead to the publication of the Climate City Contract. The Climate City Contract entails the commitments, action plan and investments in order to reach climate neutrality by 2030. Through the label of Climate Neutral and Smart City, Gozo will have an increased opportunity for funding relevant projects and participating in pilot projects related to climate neutrality. Achieving this target will be beneficial for Gozo, its inhabitants and even its biodiversity.</p> | |
| | | <p><u>Conclusion</u> The GRDA examined this document in view of the Regional Impact Assessment (RIA) as per Article 8 (1) (f) of the GRDA Act. In line with the established methodology, the GRDA has initiated a Screening Process to determine whether a RIA study is required. From preliminary analysis, the Screening Process does not suggest that the proposed intervention / strategy, requires a full Regional Impact Assessment Study.</p> | <p>This conclusion was duly noted.</p> |
| 4 | <p>Nicholas Barbara BirdLife Malta 28/03/2023</p> | <p><u>BirdLife Malta's comments on the National Biodiversity Strategy and Action Plan to 2030 28th March 2023</u> Whilst welcoming the first draft of the National Biodiversity Strategy (NBS) and Action Plan to 2030, BirdLife Malta would like to take this opportunity to bring up some points in relation to the document.</p> <p>Appreciating the hard work behind the draft, we noticed some omissions, such as lack of background information on the previous Strategy period (2012-2020) implementation, its successes and failures. Evaluating the job already done and highlighting the problems and challenges faced is beneficial as it creates room for improvement and helps avoid the same mistakes, as well as provides the public with a more transparent and realistic picture.</p> <p>Although the Plan does set specify deadlines for a number of Actions, we recommend further refining the wording to ensure the Actions are tangible enough, as some of them are formulated too broadly which would not allow their proper implementation (please see comments below on this). Relevant steps are required to ensure the enforcement of the Strategy and Action Plan, including but not limited to increase ERA's staff capacity and training.</p> | <p>ERA has carried out an assessment of the NBSAP 2012-2020 in response to reporting obligations under the United Nations Convention on Biological Diversity. This served as a basis for the development of the draft NBSAP to 2030.</p> <p>Keeping in mind the strategic nature of this policy document, it should be emphasised that the development of the strategy does not end here. Further consultations with stakeholders will be held to discuss concretely how actions will be implemented and to develop specific indicators to measure progress.</p> <p>Additionally, ERA is proposing the establishment of an NBSAP Forum (vide Action 22.2). The NBSAP Forum is an opportunity to share progress and monitor implementation whilst strengthening collaboration between key actors.</p> |

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| | <p><u>General comments:</u></p> <p>➤ Some Actions in the Plan are phrased rather vague and require clarification or elaboration. Such as:</p> <ul style="list-style-type: none"> - Action 8.2 “Chemicals policy is strengthened to improve the protection of the environment and human health” should be more explicit and needs to explain in what way/s the policy is to be strengthened. - Another example is Action 16.2: “The relationship between the environment and the economy informs decision-making” which is rather an ambiguous statement than a call for a certain action. - Action 17.2 states that “By 2027, environmental sustainability, including biodiversity protection, is further integrated into the national education system”, but does not explain what exact actions/steps/measures it entails. - Same for Action 21.3: “By 2027, aspects related to environmental liability are strengthened” which is quite generic to lead to the lack of action. <p>Such undetailed wording leaves enough room for interpretation which in turn can lead to insufficient action taken; it also will add significant difficulty at the stage of monitoring and evaluation.</p> | <p>Keeping in mind the strategic nature of this policy document, it should be emphasised that the development of the strategy does not end here. Further consultations with stakeholders will be held to discuss concretely how actions will be implemented and to develop specific indicators to measure progress.</p> |
| | <p>➤ While promoting better environmental management and setting ambitious targets, authorities should be consistent in their actions. This, for instance, would mean that no controversial regulations or policies contradicting the NBS are proposed and adopted, such as:</p> <ul style="list-style-type: none"> - the amendments to waste legislation which proposed lowering the minimal fine for illegal dumping of waste https://meae.gov.mt/en/Public_Consultations/MEW/Pages/Consultations/Establishmentofmandatoryseparationofwastewithinnationalwastelegislation.aspx; - the proposed amendments to daily penalties for violating environmental legislation which are not perceived as a positive step, since they would generally contribute to lower charges for such violations https://era.org.mt/daily-penalties-environment-amendment-regulations-2022/; | <p>As the national policy driver in relation to the conservation and sustainable use of biodiversity, the NBSAP to 2030 will strive to integrate biodiversity concerns across different regulations and policies as well as strengthen compliance and enforcement as outlined in Target 21.</p> |

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| | | <ul style="list-style-type: none"> - Controversial and deleterious changes to conservation of wild birds regulations which allow the transfer of taxidermy collections, indirectly facilitating the persecution of protected species and the illegal killing of birds; - Constant violations of the Birds' Directive through the application of questionable hunting and trapping derogations, etc. | |
| | | <p>➤ The Action Plan would benefit from:</p> <p>+ Each Target and/or Action being associated with the leading entity/authority(s) responsible for its implementation. We noted and appreciated the suggested whole-government approach; clearly, environmental policy is an integral one and should be incorporated in each sectoral policy, yet spreading responsibility across sectors can also result in mismanagement of resources or inadequate implementation, especially if responsibilities are not fully defined or tasks allocated not clearly. Many Actions under this Action Plan fall outside the scope of ERA's competence, or intertwine with remits of other entities, therefore strong cooperation and clear assigning of tasks is essential.</p> | <p>ERA has already engaged in extensive inter-ministerial consultations and continues to engage with key entities to ensure clear responsibilities and effective collaboration for the NBSAP implementation, and ultimately the mainstreaming of biodiversity across sectors. Further discussion in this regard will continue through the NBSAP Forum (vide Action 22.2). It should also be emphasised that the NBSAP is a national policy that necessitates cooperation across government.</p> |
| | | <p>+ The scoreboard containing a precise timeline for each Action would support greatly with implementation monitoring. Given the generic character of present Actions, we recommend splitting them into sub-Actions/Tasks, specifying exact timeframe for their implementation, efficiency indicators, responsible entity/s and progress status. Same as the Action Plan itself, such a scoreboard shall be a living amendable document.</p> | <p>It should be emphasised that the development of the strategy does not end here. Further work to clearly identify how the actions will be implemented is ongoing, through discussions with responsible actors on indicators for measuring progress. Additionally, actions are generally time-bound; where a timeline is not provided it is assumed that implementation is ongoing, by 2030. This is specified under section 3.3 of the draft NBSAP.</p> |
| | | <p>+ Establishing a Committee to oversee and support with the implementation progress would greatly contribute to the overall efficiency of the Strategy realisation and evaluation. Such a Committee would consist of different stakeholders involved in the process.</p> | <p>ERA is proposing the establishment of an NBSAP Forum (vide Action 22.2). This will enable an opportunity to share progress, monitor implementation and strengthening collaboration between key actors.</p> |

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| | | <p>Feedback on certain actions:</p> <p>➤ Target 1. Action 1.1 sets the 30% target for protected areas on land and at sea. It is better to specify that protected areas shall form part of the Natura 2000 network. Furthermore, 1/3 of those protected areas should gain from strict protection (for instance, establishment of no-take zones in some parts of MPAs)</p> | <p>Action 1.1: Since Malta has a different range of designation types covering a range of features and circumstances, it is preferred not to limit the 30% target to Natura 2000 sites. With respect to strict protection, it should be highlighted that Malta’s national specificities, such as its small size and high population density, together with the fact that most Nature 2000 sites coincide with areas used for leisure purposes make it challenging to leave natural processes essentially undisturbed. Therefore, it is not deemed realistic to assign the status of strict protection to one third of protected areas.</p> |
| | | <p>➤ Target 1. Action 1.2 contains the requirement to revise management plans for N2K sites “as necessary”, while we suggested amending the wording to “as necessary, but at least once every 5 years”.</p> | <p>Action 1.2: ERA concurs that management plans and their effectiveness do need to be assessed in a periodic manner and as such ERA is working in this context. To this end, given the strategic nature of the NBSAP it is in our view more suitable to retain the current wording of this action. Meanwhile, it is noted that the EU Habitats Directive does not include a specific amount of years when a revision should be made.</p> |
| | | <p>➤ Target 1. Action 1.4 also needs clarification on how often “periodically” means for the assessment of N2K management.</p> | <p>Action 1.4: “Periodically” will be determined as part of the development of the system for the evaluation of management effectiveness of Natura 2000 sites.</p> |
| | | <p>➤ Target 1 could benefit from widening its focus onto local designations, since strategically sites of national level (such as Sites of Scientific Importance, Areas of Ecological Importance, Tree Protection Areas, Sites of High Landscape Value, protected beaches, etc) are meant to form a coherent network and a set of green corridors thus ensuring connectivity of natural areas.</p> | <p>Target 1: The National Ecological Network does include various designation types which are characterised by features as stipulated in the Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44).</p> |
| | | <p>Research and permanent environmental monitoring should play a leading role in the NBS implementation.</p> | <p>ERA concurs with the importance of research and monitoring in the implementation of the NBSAP. For example Target 19 and Action 19.1 of the NBSAP are focussed on enhancing scientific research.</p> |
| | | <p>➤ Target 3 should stress on <i>Posidonia oceanica</i> habitat restoration, which qualifies as a priority ecosystem contributing to climate change mitigation and adaptation.</p> | <p>Given the comprehensive scope of the Targets, ERA does not consider it suitable to specify a specific ecosystem/habitat over others. Moreover, the prioritisation of ecosystems with potential for climate change adaptation and mitigation is already highlighted in Target 3. This said, the comment is duly noted and will be taken into consideration during the implementation of pertinent actions.</p> |

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| | <p>➤ Target 4 does not emphasise enough the crucial role of data collection and research which is needed to address the issue of genetic contamination of local fauna. Certain harmful practices, such as release of captive-bred birds (such as captive-bred <i>Coturnix coturnix</i> and <i>Streptopelia turtur</i> releases by hunting groups) whose genetic background is not assessed in depth, should be regulated and controlled. Another example demanding urgent attention is the lack of understanding of the impact of domestic honey-bee imported from other countries on local genetic resources.</p> | <p>The role of research in assessing genetic contamination is construed to be addressed by Action 4.4. ERA has taken note of the further comments and will discuss relevant matters with the relevant competent authorities, as applicable.</p> |
| <p>➤ Target 5. Action 5.2 concentrates on the importance of assessment of environmental risks and impacts of projects, yet, as we know from past experience, it is not enough to assess the impacts and propose mitigation measures. We feel that it is crucial for ERA to have the right to veto projects and developments which are proven to cause harm to the environment, directly or indirectly. Full enforcement of the relevant legislation and regulations should be guaranteed including by ensuring an adequate number of staff to monitor and oversee the implementation of EIA/AA recommendations, and an adequate follow-up for mitigation measures proposed at EIA stage to be undertaken and enforced, and if necessary have the ability to issue sanctions or impose remedial measures to contractors/developers where these are not met.</p> | <p>Whilst noting the points raised, reference is made to the fact that the NBSAP is a strategic document providing direction for the conservation of biodiversity to 2030, a part of which is the assessment of environmental risks and impacts of projects. In this regard, the provisions of legislation linked to Environmental Impact Assessment and Appropriate Assessment play a critical role vis-à-vis the provision of recommendations and mitigation measures linked to environmental impacts. To this end, EIA/AA recommendations/mitigation measures proposed by ERA are included as conditions to a respective development permit, ERA being a statutory consultee. These are followed-up by ERA's enforcement as relevant. In case of environmental permits issued by ERA, compliance is ensured by ERA and where necessary, a third party monitor is engaged specifically to monitor the implementation of the permit. The NBSAP itself is designed to support the implementation of such legislative instruments and processes within the wider context.</p> | |
| <p>➤ Target 5. Action 5.3 should clearly state that no harmful interventions on protected landscapes shall be allowed.</p> | <p>It is deemed more suitable for the framework policy addressing landscape, rather than the NBSAP, to define such specific objectives, following the relevant stakeholder consultations.</p> | |
| <p>➤ Target 7. Policy tools referred to in Action 7.1 should include among others planning and development policies, agricultural policies, regulations on hunting and trapping, local policies, procurement procedures, traffic regulations (including maritime transport), waste management legislation, etc.</p> | <p>Comments are duly noted and will be taken into consideration during the implementation of the action.</p> | |
| <p>➤ Target 7. Action 7.2 should make it clear that mentioned green initiatives are to be implemented on a systematic, regular basis and across all localities as opposed to random projects aiming rather at gaining public attention than creating a green urban network across the Maltese Islands.</p> | <p>Comments are duly noted and will be taken into consideration during the implementation of the action. It should be noted that the implementation of Action 7.2 comprises the investment of €700 million towards environmental projects through the new agency, Project Green.</p> | |

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| | <p>Target 8. Waste management on protected sites should be careful and proportionate. Biosecurity plans for such sites should be compiled (relevant for Target 6) and the waste management section is to be integrated into those (BirdLife Malta produced Biosecurity plans for different sites falling under the LIFE PanPuffinus! Project which could be used as templates for drafting similar plans for other protected areas).</p> | <p>Comments on waste management of protected areas are duly noted and will be taken into consideration during the implementation of Action 1.2. To this end waste management and biosecurity measures are being taken into account during the revision of the terrestrial Natura 2000 management plans.</p> |
| | <p>➤ Target 8. Action 8.6 could cater for stronger protection of the International Dark Sky Heritage sites in Malta. Clear and precise noise and light reduction targets should be included into the management plans for the N2K sites (including by updating the plans which do not contain such targets). Underwater noise issues should be studied further and addressed accordingly, especially within the MPAs.</p> | <p>Comments are duly noted and will be taken into consideration during the ongoing revision of conservation measures of terrestrial Natura 2000 sites. Underwater noise is addressed under the Marine Strategy Framework Directive (refer to Action 2.8). Additionally, we would highlight that alignment of the MSFD monitoring and management processes with the Natura 2000 management process is ensured throughout the implementation of both policy processes. In this regard we would make reference to the Monitoring programme under the MFSM which can be found here: https://era.org.mt/wp-content/uploads/2023/06/Monitoring-Strategy_Underwater-Noise_Public-Consultation.pdf</p> |
| | <p>➤ Target 9. Action 9.1 (as most other actions) should be divided into further sub-actions, one of which shall be compiling a National Action Plan (under the Rome Strategic Plan for Eradicating illegal Killing, Taking and Trade of Wild Birds in Europe and the Mediterranean Region) to reach 50% reduction in IKB till 2030.</p> | <p>It is important to note that the NBSAP is designed in a manner to provide headline actions which will be implemented to obtain strategic objectives. The means of implementation of these actions are governed by internal processes within ERA in conjunction with identified key stakeholders. To this end, to ensure that the NBSAP allows for the ease of understanding, it was deemed necessary to limit the number of sub-actions. ERA has taken note of the further comments and will discuss relevant matters with the relevant competent authorities, as applicable.</p> |
| | <p>➤ Target 9 should also have regard for such sensitive issues as release of captive-bred specimens into the wild, a procedure for which is not regulated at the moment and can lead, (if not already) to environmental risks associated with genetic contamination of wild fauna, pathogens spread, etc.</p> | <p>ERA has taken note of the further comments and will discuss relevant matters with the relevant competent authorities, as applicable. In relation to the specific issue on Target 9, the release of captive-bred species are addressed through existing national legislation under the competence of ERA includes safeguards in relation to the re-introduction of species.</p> |
| | <p>➤ To achieve Target 10 such a symptomatic indicator as Farmland Bird Index (FBI) needs to be effectively applied. For this, FBI should be updated annually as per EU obligations.</p> | <p>ERA has already engaged in discussions with key actors in order to lay the way and fine tune the Farmland Bird Index together with other indicators being developed to concretely measure progress.</p> |

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| | | <p>➤ Target 11. The issue of unsustainable fishing practices is urgent to address, since it does not only destroy the marine environment, but affects the food security in a longer perspective. Supporting local low-scale fisheries, improving monitoring of fishery activity (such as installing REM on all vessels, ensuring frequent on-board observations and more effective landings control), providing incentives to fishers to apply mitigation measures, eliminating harmful subsidies, conducting timely and efficient impact assessments, raising awareness on the repercussions of overfishing, bycatch and other unsustainable practices, etc. are vital measures to address the problem. No-take zones within the designated MPAs should be established to give opportunity for passive restoration of damaged ecosystems and depleted fish stocks. Such no-take zones shall fall within the areas of Marine N2K sites with stricter protection.</p> | <p>Comments are duly noted and will be taken in consideration during the implementation of the relevant actions. As the national policy driver in relation to the conservation and sustainable use of biodiversity, the NBSAP to 2030 will strive to integrate biodiversity concerns across different regulations and policies. The specific issues raised are addressed through the implementation of the EU Common Fisheries Policy, the Natura 2000 management process and through the implementation of the MSFD. These sector-specific policies are a more suitable vehicle for addressing the issue raised.</p> |
| | | <p>➤ Principle declared under Target 14 should be duly applied to the allocation of relevant funds (such as EMFAF, funds under the CAP, etc.).</p> | <p>Target 14 is designed to encourage the notion of 'nature positive' in terms of promoting actions and projects which result in positive outcomes for biodiversity, and is meant to be applied cross-sectorally.</p> |
| | | <p>➤ Local councils should be given a strong and empowered role in the implementation of all Targets, especially Target 16 and whole Policy Area 5. The local initiative should be welcomed and supported; the local councils' opinion regarding large-scale projects and developments within their boundaries should be duly valued and their concerns prioritised.</p> | <p>ERA concurs that local councils have an important role in the implementation of the NBSAP and will continue to welcome and support local initiatives and opportunities for collaboration with them. It should be noted that while the Development Planning Act (CAP 552) provides for the consideration of environment as part of planning decisions, the Act itself falls beyond ERA's competency.</p> |
| <p>Comments submitted during stakeholder consultation meeting on 3rd March 2023</p> | | | |
| 1 | <p>Dylan Farrugia Koalizzjoni għall-Konservazzjoni tan-Naħla Maltija 03/03/2023</p> | <p>Good to see that genetic diversity of native species is being referenced in this action plan for biodiversity. We understand that biodiversity is priceless, and once lost we will not be able to get it back. Our group's role gives particular importance to the Maltese honey bee that is an endemic subspecies that is only found in the Maltese Islands. Unfortunately, this subspecies is experiencing an existential crisis since there are no regulations on the importation of other non-native honey bees, resulting in hybridisation, thereby reducing the unique characteristics of Malta's honey bee.</p> | <p>In the NBSAP there is a target and a number of actions which address genetic diversity. ERA has established what needs to be done. It should be noted that the development and publication of the NBSAP is considered as the starting point for actions which are iterative in their design, allowing for evolution over time where and when appropriate. Additionally, further discussions with stakeholders will be held to help further develop indicators through which implementation of targets and actions will be measured.</p> |

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| | What tangible measures and actions will be taken, including from the aspect of the Maltese Honey Bee, to ensure the protection of the genetic diversity of these species and biodiversity (in general)? | |
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LATE COMMENTS

| Ref No. | Name of Stakeholder / Date | Comments Received | Response / Remarks |
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| 1 | Fondazzjoni għall-Konservazzjoni tan-Naħla Maltija 29/03/2023 | <p><u>KONSULTAZZJONI PUBBLIKA DWAR L-ISTRATEĠIJA NAZZJONALI TAL-BIJODIVERSITÀ U PJAN TA' AZZJONI SAL-2030</u></p> <p>B'referenza għall-konsultazzjoni pubblika imsemmija hawn fuq, bħala organizzazzjoni li qed naħdmu favur il-konservazzjoni tan-Naħla Maltija (<i>Apis mellifera ruttneri</i>) nixtiequ nżidu l-kummenti tagħna dwar l-istrateġija proposta. Ser inkunu qed niffukaw il-kummenti tagħna fuq azzjonijiet li b'mod dirett jolqtu l-vitalità tan-Naħla tal-Għasel Maltija.</p> <p><u>L-importanza tal-bijodiversità</u> Il-bijodiversità hi essenzjali għax hija l-varjetà tal-ħajja fid-Dinja, inkluża l-varjetà ta' pjanti, animali, u mikro-organizmi, id-differenzi ġenetiċi bejniethom, u l-ekosistemi li jiffurmaw. Hija kejl ta' din il-varjetà u l-proċessi tagħha, inkluż in-numru ta' speċi u sottospeċi (u varjanti), il-livell ta' diversità ġenetika, u l-varjetà tal-abitati u ekosistemi. Filfatt bijodiversità hi kkategorizzata fi tlett tipi; ġenetika, speċi u ekoloġija. Il-bijodiversità hija importanti għal ambjent b'saħħtu, billi tipprovdi servizzi essenzjali bħall-pollinazzjoni, il-kontroll tal-pesti, il-ħażna tal-karbonju, il-filtrazzjoni tal-ilma, u l-arrikkiment tal-ħamrija; filwaqt li tipprovdi wkoll riżorsi vitali bħal ikel, riżorsa t'enerġija u mediċini fost ħafna oħrajn.</p> <p>In-Naħla tal-Għasel Maltija, u l-isfidi li qed taffaċċja Fost ir-regġuni li l-ispeċi tan-Naħla tal-Għasel (<i>Apis mellifera</i>) hi indigena insibu dak Mediterranju. In-Naħla tal-Għasel hi speċi ta' dakkara importanti ferm. Mhux biss minħabba l-irwol ta' dakkara ġeneralista li għandha din l-ispeċi u għaldaqstant is-servizz ekoloġiku importanti li</p> | Despite the late submission of these comments, ERA has taken note of this feedback and will ensure that the forthcoming national strategy on pollinators will be streamlined with the overarching NBSAP. |

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| | <p>tippovdi, iżda wkoll minħabba l-irwol fundamentali li għanda f'kuntest kulturali u apikulturali. Fil-gzejjer Maltin, insibu tgħammar is-sottospeċi (razza) tan-Naħla tal-Għasel Maltija (<i>Apis mellifera ruttneri</i>) li tinsab biss fl-arċipelagu Malti, fatt li jagħmilha endemika għal dawn il-gzejjer. Sforz id-distribuzzjoni limitata ta' din is-subspeċi ta' Naħla tal-Għasel, tagħmilha aktar sensittiva għal proċessi li preżentament qegħdin u 'il quddiem jistgħu jikkawżaw is-sitwazzjoni imwera tagħha. Konsegwentament dal-proċessi jkompli jgħawwru l-bijodiversità fraggħli li tinsab f'pajjiżna.</p> <p>Huwa ċar li l-karatteristiċi tan-Naħla Maltija qed jiġu imniġġsa min-Naħal tal-Għasel ta' razez barranin li qegħdin jiġu impurtat f'pajjiżna. Peress li n-Naħal tal-Għasel jitgħammar fuq barra b'distinzzjoni minima bejn sottospeċi differenti, dan qiegħed iwassal sabiex il-ġenetika tan-Naħla Maltija li kienet iżolata għal għexieren ta' snin tithallat (<i>hybridisation</i>). Konsegwentement, b'mod indirett in-Naħla Maltija qed tinqered għax ftit ftit, qiegħda titef il-karatteristiċi 'Maltin' minħabba dan it-taħlit. Iktar minn hekk, dan iwassal sabiex l-adattament li kellha biex tgħix f'abitat u klima lokali jintilef ukoll. Dan il-proċess ta' taħlit bla dubju tefa' lil din is-sottospeċi endemika għal pajjiżna f'riskju serju ta' estinzjoni, sottospeċi li tiffirma parti mill-patrimonju naturali Malti.</p> <p>Tajjeb li ssir ukoll referenza għas-settur apikulturali lokali, li jiddependi intrinsikament fuq in-Naħla tal-Għasel Maltija. Preżentament, sforz il-kontrolli minimi ta' x'jista jiġi impurtat minn barra, in-naħla lokali qed tiġi kontaminata ġenetikament. F'ambitu fejn fis-sajf 2022, f'temp ta' ftit ġimgħat intilfu madwar 70% tal-kolonji fl-imġiebaħ minħabba l-Bagħal taż-Żunżan (<i>Vespa orientalis</i>), għandna: (a) Nirrikonoxxu li kull studju li sar dwar il-prevalenza tan-Naħla Maltija issa hu skadut u għaldaqstant hemm bżonn ta' studji ġodda, u (b) Ikun hemm pjan urġenti li ma jhallix l-importazzjoni tan-naħal minn barra (kif ġara meta ġiet introdotta l-<i>Varroa</i>) biex jikkompensa għat-telfien tan-naħal.</p> <p>Fil-kuntest tat-tibdil fil-klima, il-protezzjoni tal-bijodiversità hija importanti ferm. Il-konservazzjoni tas-sottospeċi lokali hi ukoll importanti ferm minn dan l-aspett. Il-potenzjal t' addament għal klima iktar ħarxa fil-futur qarib qiegħda biss fil-konservazzjoni tas-sottospeċi endemika. L-importanza tal-konservazzjoni tan-naħla lokali u t-trobbija tagħha hu vantaġġ u ta' importanza. Fiha innifisha s-sottospeċi Maltija għandha valur intrinsiku sforz l-endemicità tagħha, li tkompli tarrikkixxi il-bijodiversità lokali. Il-</p> | |
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| | <p>konservazzjoni ta' din is-sottospeċi huwa neċessarju anke f'ambitu t'apikultura sostenibbli fil-gejjieni.</p> <p><u>Triq 'il quddiem</u> Hekk kif l-ERA bħalissa qiegħda tfassal (1) Strategija Nazzjonali tal-Bijodivesita u l-Pjan ta' Azzjoni sal-2030, u (2) Strategija Nazzjonali u Pjan ta' azzjoni għad-Dakkara sal-2035, huwa neċessarju li ż-żewg strateġiji jkunu jikkumplimentaw lil xulxin, u ma jsirux f'izolament, dan sforz l-importanza u l-korrelazzjoni li hemm bejniethom. Fost l-oħrajn aspekt importanti, u li jikkumplimenta iż-żewġ strateġiji hu l- bijodiversità fil-ġenetika.</p> <p>Għandha tiġi kkunsidrata bis-serjeta l-pass li titwaqqaf l-importazzjoni tan-naħal tal-għasel minn barra. Iktar 'il quddiem ser inkunu qed nippublikaw artiklu li fih jindirizza din il-kwistjoni, mil-lat legali, u kif dan hu possibli, kif ġa qed isir f'ċertu pajjiżi tal-Unjoni Ewropea. Permezz ta' dan il-pass tkun qiegħda tiġi ssalvagwardjata l-bijodiversita tad-dakkara lokali, fil-forma tan-Naħla Maltija. Iżda mhux biss. L-introduzzjoni ta' stokk ta' naħal barrani, iżid ir-riskju ta' introduzzjoni ta' mard li jaffetwa lin-Naħla Maltija kif diġa ġara fil-passat (<i>American foulbrood</i> u <i>Varroa</i>). Riċerka turi li mard li jaffetwa u li hu prevalenti fost in-Naħal tal-Għasel, għandu wkoll virulenza f'insetti oħrajn dakkara. Fost il-modi ta' kif jista' jixxerred dan il-mard hu permezz tal-fjuri stess, li jzuruhom naħal tal-għasel marid, li imbagħad imarrad lil dakkara oħrajn. Għaldaqstant pass li jipprojbixxi l-introduzzjoni tan-Naħal tal-Għasel minn barra, mhux biss ikun qed iħares is-saħħa tan-Naħla Maltija u sostenibilita tal-apikultura lokali, iżda wkoll b'mod indirett dakkara oħra lokali, u f'kuntest aktar wiesgħa, l-bijodiversità lokali.</p> <p>Sakemm nilhqu dan il-livell ta' konservazzjoni, b'mod immedjat għandha tibda' l-ħidma sabiex għal inqas, jiġu mwaqqfa Żoni ta' Konservazzjoni tan-Naħla Maltija fejn ċertu żoni fil-pajjiż tkun tista' tiġi mrobbija biss l-ekotip lokali. Dan għandu jsir kemm sabiex in-naħhala jkunu esposti għal din il-bidla fil-ħsieb b'mod gradwali, iżda wkoll ħalli tagħti ċans lill-pubbliku u lil istess naħhala jedukaw ruħu f'dan ir-rigward. Din il-proposta tista' tiġi inkorporata ma' Mira 1 li qed tippromovi li sa 2030, 30% tal-art Maltija sa tkun protetta u tkun tifforma parti minn netwerk ekoloġiku.</p> <p>Għandha tiġi riċerkata l-implikazzjonijiet ta' <i>carrying capacity</i> tal-abitati Maltin, speċjalment minħabba il-<i>mean high density</i> għoli li nsibu f'pajjiżna,</p> | |
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| | <p>u li b' mod dirett taffetwa l-produzzjoni fl-apikultura, iżda wkoll l-istatus ta' dakkara oħrajn. F'dan ir-rigward, għandhom jitnaqqsu kolonji ta' naħal li ġew minbarra, mill-banda l-oħra jeħtieġ wkoll studji fuq l-istokk ta' Naħal tal-Għasel Malti li għandna, sabiex nevitaw <i>inbreeding</i> li jwassal għal telf fit-tul fis-saħħa tal-istess naħal.</p> <p><u>Konkluzjoni</u> Kuntenti naqraw li Mira 4 qed tipproponi li diversita ġenetika ta' speċi Maltin sa tkun salvagwardjata. Importanti li l-konservazzjoni ma tkun tkunx biss <i>ex-situ</i> hekk kif propost taħt Azzjoni 4.2 imma wkoll <i>in-situ</i>. Tkun ta' dieqa li nippruvaw nikkonservaw speċi lokali li imbagħad ma jkunux kapaċi jgħixu fl-ambjent naturali tagħhom. Għaldaqstant il-konservazzjoni tal-abitati naturali hi ugwalment importanti għall-ambjent b'saħħtu.</p> <p>In-Naħla Maltija tista' tiġi konservata fl-intier tagħha biss jekk titwaqqaf il-kontaminazzjoni tal-ġenetika tagħha u wara jibda' stadju ta' purifikazzjoni tal-istokk lokali. Dan it-tip ta' taħlit hu wkoll meqjus bħala tniġġis, tniġġis tal-ġenetika (genetic pollution)!</p> | |
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