



# Public Consultation Submissions & Responses

Intent and Objectives: Conservation Objectives and Measures for Malta's Terrestrial  
Natura 2000 sites

August 2021

Environment & Resources Authority



## CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Polina Venka BirdLife Malta 30/08/2021	<p>As a reaction to the public consultation on the intent and objectives of the “Conservation Objectives and Measures for Malta’s Terrestrial Natura 2000 sites”, we would like to contribute with our feedback.</p> <p><b>Contribute to maintain or restore, at a favourable conservation status, the natural habitat types and species of wild fauna and flora of community interest for which the sites were designated</b></p> <ul style="list-style-type: none"> <li>• By regularly evaluating and revising (at least once in 5 years) the management plans for each Natura 2000 site to maintain FCS of the protected areas, relying on most up-to-date data regarding habitats and species dynamics</li> <li>• By establishing an ongoing monitoring programme to keep track of any changes in the protected habitats and species populations, and amending the mentioned management plans accordingly, as well as updating and enhancing the Standard Data Forms</li> </ul>	<p>As per Regulation 14(6) of the Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44), ERA, as the Competent Authority, shall review the management plans of each SAC or SPA, at least every five years, and regularly assess the state of the protected site and the progress made in the implementation of the management plan. The current process is in fact part of the reviewing process for the measures published in 2016.</p> <p>Surveillance and monitoring is an integral part of the routine work carried out by ERA in line with Article 11 of the Habitats Directive. The continuation of such surveillance and monitoring is being ensured through various processes, and is reported to the European Commission as required by the same Directive.</p>
		<p><b>Reduce direct and indirect pressures and threats affecting the conservation status of habitats and species of community interest and hence their future prospects</b></p> <ul style="list-style-type: none"> <li>• By mapping the anthropogenic pressures and threats each site is exposed to and working out feasible mitigation measures to reduce their impact. These shall be incorporated into the respective sites’ management plans</li> <li>• By establishing a network of buffer zones around the protected areas to minimise any adverse impact on the vulnerable natural environment. The major idea of buffer zones is to enhance and foster the conservation capacity of a</li> </ul>	<p>The identification of site-specific pressures and threats is indeed an integral part of the conservation objectives/measures development process. A main aim of this process is to address and mitigate the identified pressures and threats present within Natura 2000 sites, in particular those which are affecting the conservation status of habitats and species of community interest, and hence their future prospects.</p> <p>During the designation process, a holistic approach was taken into consideration, whereby it was ensured that the habitats and species for which sites are to be designated</p>

		<p>protected area, or in other words, buffer zones are to insulate areas where the conservation of biological diversity is the primary aim. Buffer zones shall ensure proper implementation of the conservation objectives of a given protected area. Among other, it should be defined:</p> <ul style="list-style-type: none"> <li>○ the appropriate schemes of land use and management of the areas adjacent to the scheduled protected sites;</li> <li>○ the economic activities which pose a potential pressure on the protected areas and which shall be separately regulated within the buffer zone;</li> <li>○ design considerations (specifically, the height) and nature of certain types of developments occurring within the buffer zone of the protected natural territories which can be lead to negative impact on the N2K sites;</li> <li>○ depending on the site, certain light and noise generating activities shall be limited;</li> <li>○ rural areas adjacent to the scheduled protected areas shall be granted a special consideration as such that are natural buffer zones. Any activities likely to cause degradation of the rural environment around the protected areas should not be favoured.</li> </ul> <p>According to the Habitats Directive, all measures taken under the Directive must aim to reach or maintain a favourable conservation status, therefore buffer zones can be considered as a valuable asset towards reaching this goal.</p>	<p>are afforded the protection that they merit. Indeed, the designated sites go beyond such habitats and species, generally including a wider area within the designation boundary. In this regard, areas at the periphery of a site are considered as buffer areas and are important to avoid edge effects, by reducing and mitigating the impact of detrimental activities occurring from nearby built/non-natural areas. Meanwhile, the pressures from outside Natura 2000 sites that can impact the sites themselves are taken into consideration in the formulation of the objectives/measures process where and as relevant, as well as through permitting and assessment procedures and practices through which certain aspects and criteria are taken into consideration on a case-by-case basis.</p>
		<p><b>Improve knowledge on and monitoring of habitats and species</b></p> <ul style="list-style-type: none"> <li>• We recommend establishing of scientific research programmes to conduct research studies and provide scientific data to enhance the Standard Data Forms for each Natura 2000 site and fill existing data gaps</li> <li>• Regular exchange of knowledge and information with the</li> </ul>	<p>Operational objectives related to scientific research will be taken into consideration and included as necessary. Meanwhile, surveillance and monitoring is an integral part of the routine work carried out by ERA in line with Article 11 of the Habitats Directive. The continuation of such surveillance and monitoring is being ensured through</p>

		<p>stakeholders is necessary for the efficient environmental monitoring, as well as relevant stakeholders engagement into the research activities</p> <ul style="list-style-type: none"> <li>• Encourage and initiate projects aimed at closing data gaps with regard to various elements of Maltese terrestrial habitats and species (including, but not limited to LIFE projects) which shall also involve different stakeholders and contribute to knowledge exchange</li> </ul>	<p>various processes, and is reported to the European Commission as required by the same Directive. Relevant information is also used to update the Natura 2000 Standard Data Forms.</p> <p>An integral component of the management planning process is stakeholder engagement. Clear communication of site-specific conservation objectives and related measures will aim to increase stakeholder knowledge and commitment as relevant. In recognition of this vital stakeholder role, ERA will continue to engage stakeholders and increase CEPA (communication, education and public awareness) initiatives, which aim to inform relevant stakeholders, to guarantee the long-term successful management of Malta's terrestrial Natura 2000 sites.</p> <p>ERA has been and is involved in various projects and other initiatives with the aim of closing data gaps, to increase awareness and to implement measures on the ground. It also provides support towards various projects led by other entities (government and non-governmental). ERA commits to continue in its endeavours in connection with Natura 2000 sites and the implementation of objectives and measures.</p>
		<p><b>Increase conservation and restoration efforts for pertinent habitats and species following a prioritised approach</b></p> <p>The lion's share of Maltese Natura 2000 network is spread over the coastal areas which are recognised for their importance to seabird populations. Our interest here is mainly focused on the safeguarding of nesting sites of the 3 vulnerable seabird species: Yelkouan Shearwater (<i>Puffinus yelkouan</i>), Scopoli's Shearwater (<i>Calonectris diomedea</i>) and Mediterranean Storm-petrel (<i>Hydrobates pelagicus</i>)</p>	<p>The first phase of the public consultation process aims on informing the public of its intent to initiate the revision process for the "Conservation Objectives and Measures for Malta's Terrestrial Natura 2000 sites".</p> <p>With regard to Natura 2000 site-specific issues and recommendations, relevant stakeholders will be consulted at a later stage and invited to provide their views and proposals to come up with concrete</p>

	<p><i>melitensis</i>). To contribute to their conservation status, we recommend taking simultaneous measures on land and at sea to protect these birds during their full life-cycle. The population of Yelkouan Shearwater has been decreasing over the last decade, and the species is classified as Vulnerable to extinction. Malta hosts about 10% of the global population of Yelkouan Shearwater and has to take feasible measures to contribute to the restoration of FCS of the species. In this view, we recommend:</p> <ul style="list-style-type: none"> <li>• Granting further protection to St. Paul’s Islands as a Special Protection Area as proposed by BirdLife Malta under the Bird’s Directive. The islands support a recently established colony of up to 70 pairs of individual birds which are expected to benefit from further protection (please see the attachment 1, 2) (<i>maps were provided with submission</i>)</li> <li>• Considering the establishment of a SPA site at Il-Majjistral Nature History Park And Cumnija for Yelkouan Shearwaters (as also proposed by BirdLife Malta) – which areas is already designated as the Rdumijiet ta’ Malta: Ir-Ramla tač- Ćirkewwa sal-Ponta ta’ Bengħisa (MT0000024) SAC (please see the attachment 1, 2) (<i>maps were provided with submission</i>)</li> <li>• Taking measures to eliminate or minimize the pressures and threats the birds face, such as predation by rats, disturbance from recreational activities, light and noise pollution, loss of breeding habitat, illegal hunting. One of the biggest threats was proven to be predation of eggs and chicks by rodent species, namely rats. Despite the rat control programme implemented during several LIFE projects (LIFE Yelkouan Shearwater Project (2006 -2010), LIFE+ Malta Seabird Project (2011-2016) and LIFE Arčipelagu Garnija Project 2014 – 2020), rats remain a serious threat for the seabirds due to presence of litter on sites adjacent to the colonies. Efforts should be put to strengthen the enforcement of environmental legislation and paying more attention to setting of a viable</li> </ul>	<p>conservation objectives and measures for habitats and species which are site-specific.</p> <p>The designation of additional Natura 2000 sites is not part of the scope of the current process of defining conservation objectives and measures. However, the proposals being made have been taken note of.</p>
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		<p>waste management strategies and plans for the Maltese islands in general and especially for the sensitive protected areas</p> <ul style="list-style-type: none"> <li>• Granting stricter protection to certain caves and cave systems which are valuable in terms of establishment of Yelkouan Shearwater (such as Għar Ħasan cave system located within the <i>SAC/SPA Rdumijiet ta' Malta: Mix-Xaqqa sal-Ponta ta' Bengħisa</i>). The additional measures can include limiting the access to the caves; restricting noise and light generating activities in close proximity to the site.</li> </ul>	
		<p><b>Manage activities within terrestrial Natura 2000 sites</b></p> <ul style="list-style-type: none"> <li>• In order to guarantee that economic activities implemented by the private sector within Terrestrial Natura 2000 sites abide by the management plans, it is necessary to allocate a sufficient budget to cover all costs arising from managing the N2K sites, partly provided by the private entity and partly provided by the government in joint agreement</li> <li>• The impacts related to the various economic activities could be as follows: <ul style="list-style-type: none"> <li>○ litter present on sites</li> <li>○ disturbance from recreation activities (BBQs, camping, etc.)</li> <li>○ light and noise pollution</li> <li>○ unsustainable tourism</li> <li>○ proximity of roads and development areas</li> </ul> </li> <li>• Nature Permit should be a required precondition for granting a permission to conduct any activities which can threaten the ecosystems and their elements within the N2K network. Besides other, this should include the authorisation for trapping on sites falling within the N2K sites. Trapping should not be favoured on protected habitats.</li> </ul>	<p>While developing the objectives and measures, ERA ensures pertinent discussions related to financing for their implementation by relevant entities, and this through national public funds, private funding and through funding instruments.</p> <p>Meanwhile, ERA has a nature permitting system in place addressing activities within Natura 2000 sites as pertinent.</p>

		<p><b>Ensure stakeholder involvement and cooperation among entities</b></p> <ul style="list-style-type: none"> <li>• The responsibilities should be explicitly defined within governmental structures to avoid conflict of competencies where one authority is responsible for the management of the sites, ideally within the Environment and Resources Authority. To effectively implement the management plans and strengthen the enforcement on the sites, we strongly recommend allocating a sufficient budget on these needs</li> <li>• A responsible management authority shall be appointed for each scheduled Natura 2000 site. Such a management body will be in charge of the implementation and revision of a pertinent management plan, overseeing the activities on the site, as well as monitoring of the protected habitats and species</li> <li>• To avoid tension and conflicts amongst different stakeholders operating in the area of N2K sites, potential impacts, threats, and opportunities have to be identified and addressed. It has to be guaranteed from both, governmental side and private sector, that all planned activities will be implemented in close cooperation and consultation with the responsible management authority for N2K sites, at all times considering the sustainable management of Malta's Natura 2000 network and the importance to maintain and contribute to its FCS. The cooperation can be strengthened by actively involving non-governmental organisations and other relevant stakeholder into the implementation actions agreed upon under the sites' management plans and distribute responsibilities amongst involved stakeholders.</li> </ul>	<p>Assigning responsibilities following reciprocal agreement with pertinent entities and stakeholders is one of the steps to be considered through the objectives/measures development process.</p> <p>ERA is the current main regulatory entity in terms of site management, also ensuring discussions related to financing of measures on the ground. It works in close collaboration with governmental (e.g. Ambient Malta) and non-governmental organisations for the management of the sites on the ground, and will continue to do so. Indeed, a number of sites are already covered by management agreements or other similar arrangements, which generally include or consider an action plan for the implementation of measures.</p> <p>ERA commits to continuously assess and hence evaluate the current system, to ensure the most effective working arrangements possible.</p>
		<p><b>Fulfil the obligations under the European Union Nature Directives, namely the Habitats Directive (Directive 92/43/EEC) and the Birds Directive (Directive 2009/147/EC) and related multilateral environmental agreements</b></p>	<p>ERA ensures the consideration of all relevant policies, especially those related to nature conservation, when developing conservation objectives and measures. Streamlining is hence guaranteed to lead to effective and efficient conservation steps.</p>

		<p>In addition to the mentioned Directives, we would like to draw your attention to the importance of aligning with such policies and legal frameworks as:</p> <ul style="list-style-type: none"> <li>• the EU Biodiversity Strategy</li> <li>• EU Regulation 1143/2014 on Invasive Alien Species</li> <li>• Bern Convention</li> <li>• Convention on the Conservation of Migratory Species of Wild Animals</li> <li>• Ramsar Convention</li> </ul>	
2	<p>Sephora Sammut</p> <p>The Cliffs Interpretation Centre</p> <p>30/08/2021</p>	<p><b><u>Do you agree with the proposed intent and objectives presented?</u></b></p> <p><b>2. Pressures and threats brought about by Land use change</b></p> <p>The illegalisation of finch trapping practices between 2008 and 2013, and between 2017 and 2019, brought about a change in land-use. Halting finch trapping resulted in land being leased or sold to different users for different uses that could have been less or more detrimental to the conservation status and environment of the designated Natura 2000 site, especially to local species that inhabit and breed in the area.</p> <p>Fulfilling the obligations of the Nature Directives is a must, however secondary potential local repercussions from land use changes must be considered beforehand.</p> <p><b>5. 6. 7. Conservation efforts, activities and stakeholder involvement</b></p> <p>In ten years of experience running The Cliffs Interpretation Centre, we can conclude that to be able to increase conservation and restoration efforts, manage activities and ensure stakeholder involvement in the Natura 2000 site, all types of stakeholders and land users should be prioritised – starting with landowners, tenants and followed by all other main land-uses (farming, hunting and trapping, visitors – either local, national and international).</p>	<p>ERA has taken note of the comment made and clarifies that the measures shall be addressing pressures and threats on the individual sites. It is also being clarified that the trapping regulations and the regulation of changes in land use fall beyond the remit afforded to the Authority by legislation.</p> <p>This public consultation on the intent related to the development of conservation objectives and measures is the first step of stakeholder consultation/involvement initiatives ultimately intended at gathering information from all those who are directly or indirectly involved in the management of the sites or have an interest in providing their input during the process.</p> <p>The formulation of conservation objectives and measures for Malta's terrestrial Natura 2000 sites shall build upon Malta's first "Management Plans and Conservation Orders</p>



			for Terrestrial Natura 2000 Sites in Malta & Gozo” which were adopted in 2016, for which the project has been awarded the CIEEM Best Practice Award for Stakeholder Engagement.
		<p><b><u>What do you envision for Malta’s terrestrial Natura 2000 network to 2030?</u></b></p> <p><b><u>What aspects do you retain to be crucial to safeguard Malta’s terrestrial Natura 2000 network to 2030?</u></b></p> <p><b>Water</b></p> <p>Malta has undergone almost seven years of drought with escalation of issues related to water scarcity for agriculture and maintenance of the natural habitat. In consideration of the effects of climate change which have already started being felt and the implications of increased droughts, sustainable solutions are a requirement to improve water scarcity in the area. With such solutions, not only agriculture will flourish but even the general natural habitats. Radical reduction of wild trees has become a norm, hence, sustainable issues need to be found to ensure that trees remain healthy.</p>	Malta’s terrestrial Natura 2000 sites will include conservation objectives and measures aimed at increasing the resilience of biodiversity, which is an important component for climate change adaptation; while it is being clarified that aspects related to water scarcity are catered for through other policy considerations.
		<p><b>SO value</b></p> <p>Unlike other Natura 2000 site in the Maltese Islands, most of the Dingli Natura 2000 site is privately owned and not government-owned. Farmers, being the main land users are aware of this, and hence, their sense of belonging to the area is higher.</p> <p>Farmers play an important role in Natura 2000 areas, in consideration that current land-use is a direct result of traditional agricultural practices. Despite the role of farmers in Natura 2000 areas, they are not directly involved in the management of the sites, so the inclusion and participation in decision-making of farmers, landowners and local people on planning and managing sites could</p>	Farmers are recognised as one of the main stakeholder groups in most Natura 2000 sites given their vital role as land managers. Farmers will be able to play an active part in contributing towards landscape management and ecological conservation with the aim to meet the Natura 2000 sites’ conservation objectives. While individual farmers are welcome during the discussion process, the respective Agriculture Ministry will also be consulted to ensure that agricultural issues related to the conservation of habitats and species are taken into consideration as relevant, ensuring the safeguarding of the farming community.

	<p>improve the habitat of these areas with lower costs due to their continuous presence.</p> <p>A national challenge that real farmers are facing in the Maltese Islands is eviction by owners from their fields. Whilst not entering into the matter as to whose right it is, it should be noted that some real farmers really do exist and the only way, from experience, to detect the right farmers is from the Standard Output Value, a tool existing for Malta which has never been used at the national level. Yet again, such an argument is being flagged up only in view of the change in land-use that can follow after the removal of the existing real farmers. The SO tool needs to be used when considering other policies and choosing the right farmers.</p> <p>Moving forward, the revision of the Flora, Fauna and Natural Habitats Protection Regulations should consider the EU's Biodiversity Strategy for 2030 whose second stage, from three, states; <i>'Restoration - Restore damaged ecosystems and rivers, improve the health of EU protected habitats and species, and for transforming at least 30% of Europe's lands and seas into effectively managed protected areas and bringing back <b>at least 10% of agricultural area</b> under high-diversity landscape features.'</i></p>	<p>The process of developing conservation objectives and measures for Natura 2000 sites does not go into the merits of land ownership issues <i>per se</i>.</p> <p>It should be noted that the intent is for the revision process of the "Conservation Objectives and Measures for Malta's Terrestrial Natura 2000 sites", in line with the Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44). Restoration is considered as part of the objectives and measures that will be developed.</p>
	<p><b>Pesticides</b></p> <p>Yearly pesticide bans from the EU became the norm. These substances can contaminate water sources and poison ecosystems. New more environmental friendly products (Even bio-pesticides) are reaching our market and replacing the typical more detrimental previous ones. Why not start educating farmers within the Natura</p>	<p>Education and information dissemination is indeed considered of benefit on this and other subject matters, and will be considered accordingly.</p>

		<p>2000 sites about such products to enhance agricultural practices that do not disturb the ecology of the site? From experience, education works better than enforcement in the long term and is less expensive, with clearer benefits.</p>	
		<p><b>Timing of projects</b></p> <p>Timing of works even for small and large projects that do not need a planning permit such as trenching works in SAC's need to be given importance by ERA. The existence of Bat breeding colonies, breeding local avifauna etc are issues that in the coming years need to be considered when certain construction works are proposed.</p>	<p>Site-specific measures to address such aspects will be included where and as pertinent. Meanwhile, ERA has a nature permitting system in place addressing activities within Natura 2000 sites as pertinent.</p>
		<p><b>Hunting</b></p> <p>For the last eight years, a drop in wild rabbits was experienced in the area. The cause was mainly the Rabbit Haemorrhagic Disease Virus. Hunting for the few remaining wild rabbits was almost negligible in the hope that the rabbit populations will increase. Through lack of selfishness, almost none of the rabbit hunters continued with their practice, all hoping that one day immunity will win and rabbits will thrive. It is only this year that slight increase in wild rabbits was seen. Could be that due to the hot longer summer, carriers such as mosquitos and flies did not thrive well!</p> <p>It is the sense of belonging that made hunters halt the practice – It is also them and the farmers that noted such a drastic drop back in 2013. Including the main stakeholders, being the same people within the Natura 2000 site, is a must for the coming years both for policy making and also for their management.</p>	<p>ERA agrees that stakeholder engagement is an important component of the conservation objectives/measures development process, as it will ascertain the long-term successful management of Malta's terrestrial Natura 2000 sites. Stakeholder consultation is indeed part of this ongoing process.</p>
		<p><b>Top-ranking Invasive alien species</b></p> <p>Setting targets on the two most detrimental invasive flora and fauna species is a must. Two prominent species within the Dingli Cliffs SAC are the African Fountain Grass and stray cats. Removal of the fountain grass will help safeguard the indigenous plants in the area. Local stakeholders that are familiar with the Natura 2000 site know</p>	<p>One of the main themes that will be considered in the formulation of conservation objectives and measures for Malta's terrestrial Natura 2000 sites will be the ongoing monitoring, data collection and effective follow-up management of invasive alien species. This will be in line with the pertinent regional and national policies/legislation.</p>

	<p>that cats kill indigenous snakes, geckos, birds, wild rabbits etc, hence an effective solution needs to be found by the relevant authorities to conserve the indigenous animals species in the area.</p> <p>Article 22(b) of the Habitat Directive (<i>to ensure regulation on deliberate introduction of non- native species</i>), Article 2 of the Birds Directive (<i>obligating member states to take measures to maintain naturally occurring birds</i>) and Article 6 of the Habitats Directive (<i>member states to take the necessary conservation measures</i>) are in place.</p> <p>So, shouldn't the way forward be an increase in monitoring and data collection that can provide ample scientific information on the extent of feline damage, that can lead the way to effective and adequate management?</p> <p>Eucalyptus trees are not being mentioned due to their importance to bees and total eradication of such trees will be detrimental to pollinators and some stakeholders.</p>	
	<p><b>Contiguous Natura 2000 land-uses</b></p> <p>The ability to ensure proper management of Natura 2000 sites is dependent not only on the area of the site itself but also contiguous zones. Waste collection sites next to/or contiguous to such areas are leading to a major overspill of light waste material when prevailing winds are in the direction of the Natura 2000 sites.</p>	<p>Pressures and threats originating from outside the designated Natura 2000 areas will be taken into consideration during the formulation of conservation objectives and measures.</p>
	<p><b>Fires</b></p> <p>When winters are relatively wet and grass grows tall, it is a norm that large grass fires occur in summer. With natural barriers that prevent fire engines from reaching the spot, grass management needs to occur before summer when winters are hopefully wet. Local stakeholders shall be helped to organise themselves before summer and manage tall grass areas.</p>	<p>Fire management strategies will be taken into consideration in the formulation of conservation objectives and measures for Malta's terrestrial Natura 2000 sites.</p>

	<p><b>Conclusions</b></p> <p>Cross-knowledge between local stakeholders and Government agencies is a must to adapt and reach the right targets. Educating local stakeholders can lead to lower management costs, keeping in mind that sustainable economics is one of the three pillars of sustainability.</p> <p>Natura 2000 sites are today valuable because of the way they were managed up till now by locals and main stakeholders. Management is best done by working closely with these groups within individual Natura 2000 sites and respecting culture, local, socio-economic issues and the environment.</p> <p>Past and current practices created today's Natura 2000 sites. Stakeholders were able to manage and address conflicts between them. The actions of undue externalities with a different agenda are not helping. Their propaganda of choosing certain issues (without a clear knowledge of what is happening, obviously because they are externalities) and deliberately avoiding issues that were and still are their responsibility, became a norm.</p> <p>Creating friction between local stakeholders by externalities will only lead to marginalise stable stakeholders and ruining such areas.</p>	<p>ERA agrees that stakeholder engagement is an important component of the conservation objectives/measures development process, as it will ascertain the long-term successful management of Malta's terrestrial Natura 2000 sites.</p> <p>In recognition of this vital stakeholder role, ERA will continue to engage stakeholders and increase CEPA initiatives, which aim to inform relevant stakeholders, to guarantee the efficient management and surveillance of all Natura 2000 sites.</p>
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