

THE COALITION OF LOCAL ENVIRONMENTAL NGOs



Recommendations for Electoral Programmes 2017

Presented to: AD, PD, PL, PN, Patrijotti Maltin and Alleanza Bidla

The following document provides 10 environmental recommendation areas for policy and decision-makers within Malta's five political parties in view of the upcoming General Elections 2017.

The following proposals should be implemented within the first five-year electoral term, i.e. June 2017 – June 2022.

1. CONSTITUTIONAL ENSHRINEMENT OF OUR ENVIRONMENT

Constitutional entrenchment of ODZ areas, with the listing of ODZ areas and the prohibition of development and commercialisation of said areas. The citizen has to be given a universal right of action to sue the State for breach of this and other Constitutionally-entrenched environmental provisions, including the duty to protect biodiversity.

2. LAND USE AND PLANNING

The PA and ERA must be placed on an equal footing with an equal say. One cannot dominate the other. Every rejection of an ERA recommendation should be fully justified in writing by the respective planning board. **The Planning Authority boards and ERA should include members of civil society and NGOs** in far greater number than at present. The three-membered **Planning and Environment Commissions and the Environmental Review Tribunal** should include planners and more professionals besides architects. No architect still active in their profession should be allowed to act as a consultant to government on land reform. The fees NGOs and ERA are charged in connection with any **planning appeal** need to be significantly reduced so as not to render this tool out of reach due to prohibitive costs.

A complete overhaul of the **2014 ODZ policies** (Rural Policy and Design policies) should be effected within the first year, following extensive consultation with NGOs, so as to close off the current loopholes. Any new petrol station approved for an ODZ area should not have ancillary facilities such as a car wash, showroom etc. No net uptake of ODZ land through the publication of any **revised local plans** should be contemplated. Such a revision should not take place before 20 years since the last such revision. All large-scale (to be defined *a priori*) ODZ development should be subjected to approval through a 2/3 Parliamentary majority and to the condition that an equivalent developable parcel of land becomes ODZ. The need for small-scale ODZ development (e.g. reservoirs, tool rooms, etc) should be fully justified by applicants with ERA and with eNGOs, with permits being withdrawn within the first year in case of abuse of permit conditions.

Masterplans for high-rise buildings and for land reclamation should be in place prior to further approvals of such projects. Current development proposals for Ta' Ċenċ and Hondoq ir-Rummien should be definitely shelved.

Legislation on Noise Pollution should be put in place. Objective measurements should be applied and enforced, in line with WHO and EU recommendations¹.

¹ http://www.euro.who.int/_data/assets/pdf_file/0017/43316/E92845.pdf

3. AFFORESTATION, NATURA 2000 MANAGEMENT AND BIODIVERSITY PROTECTION

Renewed afforestation efforts should be initiated on public government land, with community involvement to encourage ownership. At least one site should be afforested with significant numbers of indigenous trees every year. A legally-recognised **Natura 2000 site management agency** should be set up, with the aim of relieving ERA of the day-to-day management of such sites and with the mandate to apply for external funds to further implement management measures within these sites. **Approved management plans for Natura 2000 sites** should be urgently implemented. The list of protected floral and faunal species should be increased, coupled with fines for handling and poaching such species.

4. CLIMATE CHANGE

A vision for a fossil fuel-free Malta must be drawn up and researched, and plans for a fossil-fuel free Malta put in place. **Climate Change adaptation strategy** should be put in place, given inevitable climate change effects in the coming decades even if all emissions were to stop tomorrow.

5. TRAFFIC AND TRANSPORT

Traffic should be tackled head on, both as an economic AND public health challenge. **Initiatives for electric cars** must be put in place, with increased subsidies, possibly funded for by increased taxation on traditionally fuelled cars, or by tax credit for those who scrap old cars. **Enactment of a network of pedestrian and bicycle-only roads** (not bike lanes – existing roads **entirely exclusive** for biking). Heavy subsidisation of electric bikes is highly recommended. The use of polluting fuels used in shipping should be addressed and technology allowing the **on-the-road assessment of fume generation by vehicles** should be purchased by Transport Malta and related fines be spiked.

6. WASTE, WATER USE AND AGRICULTURE

The **introduction of compulsory separation of all waste at home is to be implemented.** Given our climate, the government may choose to support the introduction of garbage disposal units fitted inside kitchen sinks to handle bio-waste. Urgent measures should be introduced to curb the entry of plastic litter into our seas, with coastal catering and accommodation facilities (HORECAs) being encouraged to cut down on the use of plastic and single-use utensils.

Malta should pull its head out of the sand and realise that it is one of the top 10 water-scarce countries in the world.² **This country does not have a National Water Management Plan.** There is a need to enact legislation to establish that **groundwater** in Malta is a public resource, and must be administered as such. Ensure rainwater re-use at source in buildings, and introduce a flood tax for all buildings not having rainwater re-use infrastructure.

² (<http://www.investinginwater.org/Water+Scarcity/>)

GMO products in food must be properly labelled and regular checks must be done, including testing for pesticide residues in both local and imported consumables. Such testing facilities should be available in Malta and results should be released promptly to prevent the sale of the contaminated food in question. Enforcement of current pesticide use constraints should be strengthened up.

7. ARCHITECTURAL/BUILT HERITAGE

Prevent the demolition of heritage properties, including those outside of **Urban Conservation Areas (UCAs)**. Establish a system of maintenance grants to owners of heritage properties, and tax exemptions/grants for NGOs preserving heritage properties. Empower the Superintendence of Cultural Heritage with more resources to adequately assess planning applications, and implement Superintendence and CHAC recommendation that the Planning Authority draw up appropriate policies for the treatment of surviving historic buildings in modern streetscapes.

Safeguard the UNESCO world heritage status of Valletta, protect its skylines, as well as those of **Mdina and Cittadella** against incongruous development proposals, together with other heritage sites of archaeological importance and their buffer zones and dark-sky heritage areas (from light pollution).

8. SUSTAINABLE FISHING AND THE MARINE ENVIRONMENT

Strict enforcement of already existing laws must be implemented. Any form of fishing by explosives, poisons, curtain nets and dragging is to be abolished. Concrete action must be taken to stop the sale or distribution of immature or protected species. A marine enforcement section within the ALE and within ERA should be instituted and supported financially by government as a rapid response unit once infringements (e.g. spearfishing with SCUBA gear) are reported by the public. The confines of no-take areas within designated **MPAs** should be clearly demarcated through buoys for seafarers and a small enforcement team should be seconded on land to each MPA as reference points for the public. Large-scale **land reclamation projects** outside harbours should not be considered. NGOs and ERA should be consulted on the drafting of the national **Marine Spatial Plan**, which should be completed by 2021.

9. HUNTING AND TRAPPING

Current **hunting fines** should not be relaxed while enforcement of environmental laws should fall under a new Wildlife Crime Unit of specialised trained police officers with the involvement of environment NGOs. **Malta should cease to unilaterally apply the trapping derogation**, for which there is no justification, in view of the extensive environmental damage that trapping exerts, besides the lack of a comprehensive and publicly-available register of trapping sites within Natura 2000 sites. Hunting derogations should be reconsidered and justified by scientific facts.

10. EIA STUDIES, ENFORCEMENT AND DONATIONS TO ENGOs

Major construction works should only be approved by Parliament after environmental studies have been carried out. The definition of ‘major construction works’ should be clearly stated and adhered to. The **EIA process** should be strengthened and not undermined or prejudiced by political statements anticipating the approval of such projects prior to conducting EIA studies. ERA should conduct the **alternative site selection exercise** included within EIAs and should be consulted on matters pertaining to site selection (e.g. motorsports track) from the very start when new projects are announced. Enforcement facilities should be strengthened up and **Direct Action**, rather than sanctioning, should be resorted to more frequently, especially for illegal developments in ODZ areas, in protected sites or public land.

The **Public Domain Act** should be broadened to allow the public to invoke it while implementation by the Authorities needs to be speeded up. The eNGOs additionally **request removal of VAT from donations** to environmental organisations, and the necessary systems put into place to make this possible.

The following NGOs and Organisations have approved the above recommendations:

Din I-Art Helwa

Flimkien għal Ambjent Aħjar

BirdLife Malta

Friends of the Earth

Gaia Foundation

Nature Trust Malta

Slow Food Malta

Ramblers Association

Għaqda Bajja San Tumas

Noise Abatement Society of Malta

TerraFirma Collective

Malta Water Association

