



Public Consultation Submissions & Responses

National Strategy for Preventing and Mitigating the Impact of Invasive Alien Species (IAS) in the
Maltese Islands & National Sector-Specific Codes of Good Practice in relation to Invasive Alien
Species in the Maltese Islands

March 2020

Environment & Resources Authority

CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
Submissions Made During Consultation Meeting held on 12/03/2019			
1	Mario Tufigno 12/03/2019	Have there been studies on Invasive Alien Species (IAS) in terms of trophic levels and in terms of botanical aspects? Before decisions are taken, it is important to ensure that actions on invasive alien species do not have negative repercussions.	Yes, scientific studies were carried out and assessments have been made in relation to IAS, especially botanical studies. These studies have confirmed that such species are indeed replacing indigenous species. In relation to IAS of EU Concern, such a process has been carried out for all 28 EU member states.
2	Luqa Local Council 12/03/2019	In Luqa, people often dump freshwater turtles and domestic ducks in public garden ponds. What should Local Councils do in such cases? Are there systems in place for their exportation?	The Environment and Resources Authority (ERA) is carrying out discussions with Ambjent Malta to identify locations where such animals can be kept. Transport within the EU is not possible since even their movement is illegal within the EU.
3	Dingli Local Council 12/03/2019	Can ERA provide assistance for the removal of invasive alien species?	ERA can provide technical assistance and may consider individual requests for funding. For further information, refer to info@era.org.mt .

Submissions Made During Consultation Meeting held on 14/03/2019			
4	Vincent Attard Nature Trust Malta 14/03/2019	<p>My first comment concerns procedures and protocols required for fauna. Nature Trust Malta has an agreement with ERA on wildlife rescue. We often encounter invasive alien species during rescue operations such as terrapins. There is currently no one taking care of these. Nature Trust Malta does not have the capacity to take care of these. I think it is important that a protocol between different agencies is set up, to determine what should happen in cases when these species end up at our end. We have had cases with terrapins as well as with feral ducks.</p>	<p>Discussions are underway with Ambjent Malta in order to see how housing can be provided for such species. The selling of <i>Trachemys scripta</i> is illegal throughout the EU. Pet shops in Malta have been duly informed about this and have been given informative booklets on the subject. It is not illegal to keep such species as long as they are kept contained. If someone does not wish to keep such species, they should be given to somebody else to keep.</p>
		<p>Regarding plants, whilst acknowledging that the management of protected sites is importance, we also have to look at the origins of these alien plants in protected areas. For example, in Wied Ghollieqa, the castor oil plant is problematic. These originate from outside the site. These originate from industrial areas and private areas, leading to seed or cuttings ending up in protected areas. Site managers cannot enter private property to eradicate IAS from these sites.</p>	<p>The Flora, Fauna and Natural Habitats (Amendment) Regulations, 2019, are seeking to assist in this regard by allowing for notices to ERA to intervene in private property.</p>
5	Joseph Borg Biology Department, University of Malta 14/03/2019	<p>The Biology Department carries out research on IAS. Therefore, I would like to appeal to anyone who encounters any such species to report it to the department. We should collaborate more with ERA to ensure that any reports are followed up.</p>	<p>ERA agrees that the Department should be notified whenever IAS are detected. ERA would like to further promote citizen science to allow for more recording of IAS. ERA is willing to develop protocols with the University in this regard.</p>

6	Maria Grazia Cassar Din L-Art Helwa 14/03/2019	<p>I would like to know more about the policy regarding Agave plants. Does the policy cover all of Malta or only certain areas. In some areas, this species has become a characteristic of the landscape. In such cases would they be protected or does it need to be eradicated from everywhere?</p>	<p>All <i>Agave</i> species are alien to Malta and are damaging to the natural environment. <i>Agave</i> species should be eradicated, wherever practical and possible. ERA has already carried out control or eradication measures on the species in some areas, including I-Għadira s-Safra, Rdum tal-Madonna, Selmunett and parts of Kemmuna.</p>
7	Charles F Grech 14/03/2019	<p>Regarding residences found in areas outside the development zone (ODZ), these are major sources of IAS. I would like to recommend to ERA to approach and inspect residences found in ODZ to inform and control that certain species should not be planted in these areas.</p> <p>Citizens who encounter IAS along roadsides are not aware of their dangers and then choose such species to plant in their properties since they think they are suitable for planting since they are used in landscaping.</p>	<p>ERA agrees that its role as regards landscaping should be strengthened. ERA assesses planning applications involving landscaping and makes recommendations accordingly. ERA carried out various educational and communication initiatives including on national channels. ERA agrees that more awareness is needed. MEPA landscaping guidelines need to be revised and updated since they are not completely in line with current legislation.</p>
		<p>I would also like to recommend that ERA sends their reports when they are being consulted. In my opinion, there are three types of reports. One of these is when ERA decides that the application results in large amounts of environmental damage and is not acceptable. A number of conditions are given if the permit is granted. The Planning Authority has an internal policy that gardens in ODZ should be planted with indigenous species listed in the landscaping guidelines.</p>	<p>ERA has a number of ways in which feedback is submitted to the Planning Authority. Research, which is being carried out by ERA, shows that a number of times, ERA's recommendations are not reflected in the final decision. However, ERA is always clear in its recommendations, including relevant conditions where applicable.</p>
		<p>Regarding pets, specifically cats, these are alien animals, which should be kept at home. A campaign on cats is necessary since these are problematic.</p>	<p>Comments on the impact of domestic and feral animals are noted, and referred to the relevant competent authorities.</p>

		<p>We also have a problem with pigeons. Abroad, falcons are used to deter and hunt these pests. A problem in Malta is that natural predators are not present. I positively note that a hunting organisation is re-introducing the barn owl in Malta. It is necessary to work with such organisations to control IAS.</p>	<p>The reintroduction and reinforcement of native predators is being promoted. Guidelines have been issued in 2014 and the reintroduction of species has started with necessary ERA permits and MESDC funds.</p>
8	Alfred E Baldacchino 14/03/2019	<p>Further emphasis is needed on the way IAS are eradicated and disposed of. Many times these procedures result in further spread of the species.</p>	<p>Comment has been noted. This is addressed in the Strategy and Codes of Good Practice.</p>
		<p>Other institutions and local councils should help, assisting in implementing environmental laws.</p>	<p>ERA is collaborating with various other entities such as Ambjent Malta and Eco-Gozo. ERA is seeking to collaborate more with Local Councils such as on issues relating to trees.</p>
		<p>I would like to ask whether these guidelines have legal strength. This is necessary to ensure that such policies are not ignored.</p>	<p>The Codes of Good Practice are not enforceable <i>per se</i>, but provide an important tool to favour citizen engagement, indicating what can and cannot be done, fostering stewardship of the environment and promoting awareness, citizen engagement and compliance through other means than enforcement and permitting. On the other hand, there are laws, which are enforceable such as SL 549.44 and SL 549.119, one of which is being strengthened in parallel and which was also subject to public consultation processes.</p>

	<p>Action is necessary on the balloon-vine, which is problematic and highly invasive in a number of valleys such as Wied Għollieqa. Further cooperation and projects are necessary to give opportunities to people who are willing to help to control this species.</p>	<p>To be discussed further with ERA and Nature Trust Malta, which is the entity designated by ERA as the Wied Għollieqa SAC site managers commissioned by ERA).</p>
	<p>Attention also needs to be given to alien viruses, fungi and other pathogens, which may lead to economic loss such as <i>Xylella fastidiosa</i>, which affects olives and citrus. Need to consider impacts of such disease and modify procedures.</p>	<p>Matter is noted and will be referred to the relevant competent authorities.</p>
	<p>Emphasis is being made on the use of indigenous species of trees, even in landscaping. In Malta, there is no one who grows indigenous trees on a commercial basis and therefore most are imported. One of the resolutions to the Bern Convention states that any trees imported from outside the country are regarded as invasive, even if they belong to the same species. This is because these may contaminate the local gene pool of indigenous trees.</p>	<p>Noted. Unfortunately, a number of indigenous trees have become extinct from Malta and therefore the Maltese stock no longer exists. ERA is working on a list to provide information on which species can be propagated from local stock and which are acceptable to be propagated from foreign stock. For some species, which have a good local gene pool, foreign stock, should not be used. There are certain species of which only males exist locally, and therefore females have to be imported to ensure their survival.</p>
	<p>Attention also needs to be given to insect plant parasites and their dispersal, such as the longhorn beetle larvae, which attack oak trees.</p>	<p>Comment has been noted and will be referred to the relevant competent authorities. This issue is addressed by the Strategy.</p> <p>(It is noted that the oak longhorn beetle, <i>Cerambyx cerdo</i>, is a threatened native animal, which is very rare in the wild and protected due to the important and beneficial ecosystem functions it performs, and is</p>

			only regarded as a pest in relation to cultivated oak stock.)
		Further training and information is necessary for all stakeholders. More public involvement is also needed. The public is becoming more environmentally conscious. ERA should take advantage of citizens who are keen to be involved.	ERA is pushing for more citizen science as part of the strategy. This will allow for more data on IAS to be generated allowing ERA to take action where necessary and also allow for calculating risks. A number of apps already exist in this regard such as those to record alien species (e.g. alien fish in Malta and crimson fountain grass in Gozo).
		What steps are being taken regarding species which do not fall under international obligations. For example, what is being done about sales of IAS from garden centres?	Pet shops in Malta have been informed about this and have been given informative booklets on the subject. ERA is also working on informational and educational campaigns.
9	Adrian Gatt Grow 10 Trees Project 14/03/2019	There is a divergence between legislation and enforcement. For example, regarding the crimson fountain grass and the lead tree, we report to ERA sightings, however, there does not seem to have been any progress on their eradication. Response seems to be too slow.	Comment noted. The comment is appreciated, and ERA and other relevant entities will strive to publicise better their work, also because work has already been done to eradicate the crimson fountain grass from a number of areas in Malta and Gozo. Discussions with other entities such as Eco-Gozo and Ambjent Malta aim to control this species further.
		It seems that action is only being taken on those species listed in EU legislation. For example, the lead tree is not listed under any Directives and therefore no action is being taken on them.	Noted. However, ERA notes that the actions taken are based on risk assessment processes and related priorities, and not limited to EU listed species. For instance, work on IAS is not happening solely due to international obligations, and the species, which are being controlled, include <i>Agave</i> , some cactus species, Kaffir Fig and rats, which are not listed in EU legislation per se, but are known to be a major environmental issue in Malta.

10	Benjamin Camilleri ACT 14/03/2019	In addition to the Precautionary Principle, the Polluter Pays Principle should also be implemented. The largest problem is the industrial sector. This can be implemented in the form of a tax, rather than as a penalty. Responsibility should be on who is causing damage.	Noted. Follow-up meeting to be held.
11	Daniel de Castro Malta National Aquarium 14/03/2019	Various freshwater fish species, which are widely sold in pet shops, may not be invasive however may be damaging to local biodiversity.	Noted. Follow-up meeting to be held.
		Where should the national aquarium direct people who want to get rid of animals such as red-eared sliders?	ERA is carrying out discussions with Ambjent Malta to identify locations where such animals can be kept.
12	Kevin Mallia BirdPark Malta 14/03/2019	Regarding invasive and alien trees such as Acacia and Eucalyptus, ERA should inform more about possible substitutes for these trees, according to the habitat of the site, and possibly to offer funding.	ERA is working on relevant information documents and schemes. Moreover, the current MEPA landscaping guidelines will be revised and updated to indicate such alternatives.
		Regarding freshwater sliders, people have brought 111 specimens to the BirdPark to release them. ERA has never approached me in this regard. The authority should be more informed about these things.	Noted. Follow-up meeting to be held.
13	Max Galea Coastal Aquatics 14/03/2019	Regarding ornamental freshwater fish, these are imported to Malta at very small sizes and can grow up to 1 m long. This means that most aquarists would have to get rid of these fish eventually, due to the capacity of their tanks. However, such species cannot survive the local conditions. Other species however can be locally problematic, such as crayfish. We are working on a project for facilities to act as a quarantine and as a rescue centre for such animals using aquaponics. We can accommodate crayfish and freshwater fish. Piscopo Gardens is also involved in this project. We suggest we meet with ERA officials to investigate this further.	Noted. Follow-up meeting to be held.

14	Arnold Sciberras Malta Herpetological Society 14/03/2019	<p>Regarding terrapins, an option would be to fix these specimens prior to them being sold or given. The most worrying species are those which can damage native biodiversity.</p>	<p>Noted. ERA is carrying out discussions with Ambjent Malta to identify locations where such animals can be kept.</p>
		<p>A species, which we tend to forget, is the chameleon. This is not a native species, which is protected and is having negative effects on the endemic Maltese Wall Lizard.</p>	<p>Noted. The species is indeed one of the first protected species in Malta, since 1992, due to unregulated overexploitation and sale. Matter is being investigated.</p>
		<p>Regarding snakes, it is better for people to have dangerous species such as boa constrictors and pythons as pets since these will eventually die if they escape. More concerning are species, which are closely related to local species such as king snakes and corn snakes, which reproduce readily and are hybridising with local indigenous species.</p>	<p>Noted. Evidence of such hybridisation would be interesting to assess the extent of such risk and the impact of king snakes and corn snakes.</p>
		<p>Drastic measures are needed in certain measure. For example, at I-Għadira ta' Sarraflu, only invasive alien species are to be found since all native species have been eradicated. In such cases, eradication rather than control is needed.</p>	<p>Discussions are ongoing in order to eradicate IAS from I-Għadira ta' Sarraflu.</p>