



Friends of the Earth Malta

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28/02/2018

Submission of Friends of the Earth Malta in response to Public Consultation – Trees and Woodlands Protection Regulations & Guidelines on Works involving Trees (2018)

While we welcome legislation on the protection of trees and guidelines for good practice in works on trees, in our opinion the legislation falls short in communicating the benefits and importance of the protection and safeguarding of trees and woodlands to our natural ecosystems, in terms of biodiversity and providing a home for other flora and fauna, and in our urban areas, in terms of benefiting people's physical and mental well-being. We would recommend the creation of a holistic policy and legislative framework that puts these benefits upfront and has as its core aim to increase and promote trees and woodlands on our islands, not merely to minimise damage inflicted on trees and woodlands.

Urban trees

Malta's urban area generally does not meet EU air and noise pollution regulation standards, and physical activity figures of the population are extremely low. As a result of these and other factors combined, we have the highest incidence of obesity in the EU, and alarming rates of asthma and other respiratory diseases, especially among children. The importance of adequate urban design, including the promotion of trees and greenery in urban areas, should not be overlooked: there is plenty of empirical evidence for the contribution of trees and greenery in cities to alleviating negative health effects due to air and noise pollution, and in bringing about positive physical and mental health benefits associated with access to green urban spaces.

One of the most common urban tree species, the Ficus, is a hardy specimen that provides several beneficial functions in our city and village squares, and along promenades and roadways, such as providing shade, air filtering, noise abatement and providing a home for many urban birds (such as the sparrow roosts in Valletta). This tree species is completely omitted in the legislative framework, and yet the loss of more of these trees and the benefits they provide with their grand canopies in our densely populated urban areas is not something we can afford to lose. We would therefore welcome seeing them included as a protected species in urban public open spaces.

We would encourage the inclusion of a mechanism to grant historic or landmark trees monument status, and as such schedule them as part of the national natural patrimony.

Alien or invasive species

In our work we work together with local beekeepers and support local apiculture in an effort to protect the local bee species *Apis mellifera ruttneri* and other pollinators, as their role in our ecosystems and food production system is vital. The Eucalyptus tree, while rightly indicated as an alien species, does however play an important role in supporting bees and other pollinators, as they flower during a time

when nearly no other local flora flowers, and as such are essential in supporting bees and pollinators throughout the year. We would like to see the role of this tree species in the context of the local ecosystem, and in particular in relation to apiculture, better reflected in the legislation, as eradication of this species will severely impact the local bee population.

While we welcome the protection of many tree species endemic to the Mediterranean region and/or compatible with our ecosystems, we do not believe eradicating all alien species will necessarily be the best approach to conserving our natural areas and ecosystems. While alien or invasive species do pose threats, they can also play valid roles in ecosystem management, such as through preventing soil erosion, sequestering carbon, acting as wind breakers and providing a habitat and food source for local fauna. We would not wish to see the Trees and Woodlands Protection legislation resulting in a de facto decrease of trees and woodlands on our islands, and therefore would advocate reconsidering your approach to eradicating alien and invasive species to include a more holistic perspective that can ultimately lead to the goal of increasing the number of trees and woodlands on our islands.

Decision-making framework and enforcement

The legislation lacks a clear framework that sets out on what parameters decisions will be based, apart from the generic factors set out in paragraph 20.2. We fear a lack of transparency in the decision-making process on what is permitted and what not could lead to applying double standards. We would highly recommend the inclusion of a transparent decision-making framework for granting or refusing permits in the legislation.

Lack of enforcement is a problem in the upholding of legislation in different fields. We encourage the set-up of a strong enforcement team to be able to enforce and act upon any lack of compliance with the new legislation.

In conclusion, we believe that in light of climate change, loss of natural habitats and access to nature, and for our own well-being and quality of life, increasing the number of trees and woodlands on the Maltese islands is of the utmost importance. We hope that a strong and holistic policy and legislative framework on the protection of trees and woodlands can aid in achieving this aim.

Best regards,

Friends of the Earth Malta