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National Strategy and Action Plan for Pollinators to 2035

FoE Malta is very pleased to hear that ERA is finally embarking on setting up a National Strategy and Action Plan for Pollinators to 2035. Three valuable years have passed since FoE Malta had proposed, in a letter to the Ministry and ERA (dated 06.05.2020), that such a policy should be in place as soon as possible.

The strategy should aim to set a number of key proposals to safeguard all pollinators given their role in pollinating many food crops and wild plants and their contribution to our food production and the diversity of our environment. As you are aware, bees and other pollinators face a wide range of environmental pressures and some species are threatened. There are growing concerns that these pressures are leading to declines in the number, diversity and geographical ranges of individual species.

The proposed Strategy could serve as a way of combining all pollinator related initiatives, such as the National Biodiversity Strategy and Action Plan for Malta (NBSAP) and the National Agricultural Policy for the Maltese Islands. By having this strategy in place, government should send out a strong message on the importance of pollinators in nature and our well-being. This could also serve to inspire action at all levels by many other organisations and individuals, guided by the strategy's vision, aims and actions.

Malta is legally committed to protecting biodiversity and pollinators, at EU and global levels. The European Union's Habitats and Wild Birds Directives oblige Member States to protect and enhance wild species and habitats through the implementation of the 1982 Bern Convention. On a global level, Malta is a signatory to the legally binding Convention on Biological Diversity, first signed at Rio de Janeiro in 1992 and re-pledged in Japan in 2010, where the 'Aichi Targets' were formed. Unfortunately we believe that the current legal protection for pollinators in Malta is patchy and incomplete, hence why we believe that this strategy needed is required.

We hope that this strategy will also take into account the recent adoption of the EU's Biodiversity Strategy for 2030, announced in 2020, which also demands the full implementation of the EU Pollinators initiative.

One crucial gap we find in our work is the lack of research and data related to pollinators in Malta and their current status. We feel that so far this has been sporadic and mainly due to the very keen interest of researchers. We believe that this strategy will require a solid basis built on reliable scientific data.

We hope that such a policy would address:

- Support independent research to close knowledge gaps in pollinator ecology and conservation.
- Specifically, priority should be given to under-studied pollinator groups, a valuation of pollinator ecosystem services, agricultural management for encouraging pollinators and the quantifying of benefits of pollinators in urban areas (some of this work is already being done by individual researchers).
- Introduce and support a long term National Pollinator Monitoring Scheme to establish a measure of pollinator abundance and also consider adding the need for clear monitoring and relevant information.
- Develop an action plan to reduce the importation of honeybees, which have introduced and spread disease and pose a risk to the native Maltese bee. After performing research, consider also a cap on honeybees (hives) in order to ensure that wild bee species are not out competed by commercial beekeeping.
- Introduce more measures to protect and build wildlife corridors and increase landscape scale connectivity in both rural and urban landscapes;
- Introduce legal measures to protect habitats that support pollinators, such as abandoned fields, roadsides (especially country roads) and garigue;
- Encourage and direct funding towards projects – both community-based and commercial – which create pollinator habitat in urban areas;
- Encourage the need for developing a list of suitable / preferred plant species to use (and which to avoid) for public gardens, greenery and green infrastructure.
(<https://foemalta.org/wp-content/uploads/PollinatorPlants.pdf>)
- Take action to protect, restore and expand protected natural areas including national parks, nature reserves and gardens which encompass pollinator habitat;
- Ensure that there is funding for species recovery work to save the most endangered pollinator species from further decline.
- Ensure that all areas of farming policy support environmentally friendly farming practices;
- Promote the increase in area and impact of organic/sustainable agriculture/agro-ecology; The Biodiversity Strategy for 2030 demands that 25% of the EU's agricultural land must be organically farmed by 2030.

- Ensure all parts of the CAP, particularly agri-environment schemes, greening and cross-compliance; work together to deliver improvements for pollinators across the farmed environment;
- Monitor implementation of greening projects, and strengthen the protections it provides, as a priority, if it is found that it is not delivering sufficient benefits for pollinators;
- Increase and improve in quality the area under agri-environment pollinator habitat;
- Monitor the impacts of CAP reforms annually to ensure benefits are being delivered for wildlife and other pollinators.
- Work with agriculture experts to ensure that independent advice and training is provided to farmers on sustainable pest management approaches;
- Provide training to landscapers, local councils and relevant government departments on pollinator friendly measures. This will ensure that urban landscaping projects around the islands provide refuge to pollinators.
- Work and collaborate with NGOs on awareness raising initiatives and also initiatives on the ground. FoE Malta has over 8 years of experience working on the topic in terms of awareness raising and working with beekeepers.
<https://foemalta.org/beecause>
- Place a high priority on developing and promoting safe alternatives to pollinator harming pesticides, both chemical and non-chemical, especially when used on flowering crops; The Biodiversity Strategy for 2030 demands a reduction by 50% of the overall use of – and risk from – chemical pesticides by 2030 and also reduce by 50% the use of more hazardous pesticides by 2030.
- Introduce measures to enhance protection of wildlife within development and planning policy, and complement existing environmental protections;
- Ensure that the PA give adequate weight to quality green infrastructure;
- Provide clearer guidance when surveys for protected species are required as part of the planning permitting process, to ensure consistency of interpretation and to prevent planning permission from being granted without necessary surveys being carried out;

This strategy will not be effective without clear enforceable provisions. One has to ensure that protection measures are made enforceable by means of a specific policy and by inclusion and reference in planning laws and policies.

Considering that the strategy should also include targets to have a monitoring programme, it should commit to be eventually reviewed once viable data is obtained.