

**SUMMARY OF THE CONSULTATION  
PROCESS AND SUGGESTIONS FOR  
AMENDMENTS TO THE TEXT  
TO THE FIRST DRAFT OF THE**

**STRATEGY FOR  
SUSTAINABLE  
DEVELOPMENT FOR  
MALTA**

**Compiled by  
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January 2006**

## INTRODUCTION

In 2004 and 2005, the National Commission for Sustainable Development conducted a Consultation process with different population groups regarding the sustainable development strategy for Malta. Following the consultation meeting, a number of individuals also send suggestions for changes in the text.

The overall consultation process was coordinated by Lino Briguglio.

The objectives of the consultation process were:

1. To review the document on the draft strategy for sustainable development in Malta (available on <http://home.um.edu.mt/islands/ncsd/draftstrategydocument.pdf>)
2. To discuss issues of importance to the population group concerned.

Consultation meetings were organised with the following major groups:

- Women (Coordinator: Grace Attard/Marguerite Camilleri)
- Farmers (Coordinator: Tony Meli)
- Youth (Coordinator: Jean Paul De Lucca/Lino Briguglio)
- Science and Technology (Coordinator: Jennifer Harper)
- NGOs (Coordinator: Vince Attard/Lino Briguglio)
- Workers and their Unions (Coordinator: Saviour Rizzo)
- Local Authorities (Coordinator: Joe Borg)
- Senior Citizens (Coordinator: Carmel Mallia/Charles Arrigo)
- Construction (Coordinator: Kevin Buhagiar/Lino Briguglio)
- Industry (Coordinator: Jonathan Borg)
- Tourism (Coordinator: MaryLouise Mangion/Lino Briguglio)
- Energy (Coordinator: Maria Attard)
- Transport (Coordinator: Maria Attard)
- Regional meeting for Gozo (Coordinator Lino Briguglio)
- Cabinet Committee on the Environment (Coordinator Lino Briguglio)
- Social Committee, House of Representatives (Coordinator Gordon Cordina)
- Malta Environment and Planning Authority (Coordinator Marguerite Camilleri)
- Council for Economic and Social Development (Coordinator Gordon Cordina)

There were additional meetings with a number of focus groups, coordinated by Marguerite Camilleri, and intended to complement the more formal consultations, as follows:

- The Media
- University law students
- Young mothers
- Girls government secondary school students
- MCAST Agriculture students
- Local Band Club committee members.

A number of communications were received by individuals following the consultation meetings. An important letter was received from the United Nations Division for

Sustainable Development, which generally approved the approach and the contents adopted by the draft strategy.

### **Views regarding the Document**

Regarding the draft strategy, most groups and individuals agreed that the document was very comprehensive and covers all aspects of sustainable development. There were various suggestions for improvements to the text, and this is summarised in the attached document. A major shortcoming identified at the Gozo regional meeting was that the regional characteristics, particularly Gozo, were not given enough importance in the strategy document

### **Views regarding sustainable development in Malta**

In most groups there was a general understanding that sustainable development has various dimensions. The issue of lack of enforcement was highlighted in many meetings. There was a general recognition that economic instruments are useful for environmental management. In most groups there was a recognition that membership of the EU was overall conducive to sustainable development in Malta.

There were contrasting views regarding the balance between economic development and environmental concerns. Some wanted to assign centre stage to economic development, others to environmental concerns.

There were also contrasting views regarding the role of the government. Some groups (especially NGOs) wanted a larger role assigned to civil society.

### **This Document**

This document compiles and summarises the most important suggestions made during the consultation process to improve the text of the draft strategy document.<sup>1</sup> It lists the comments and identifies the sources of such comments. This document also suggests how the suggestions of the groups and individuals consulted can be inserted in the draft strategy.

The exercise was carried out by Ronald Camilleri (Ernst & Young, Malta) who was commissioned to carry out the exercise by the National Commission for Sustainable Development.

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<sup>1</sup> The document was printed and placed online on:  
<http://home.um.edu.mt/islands/ncsd/draftstrategydocument.pdf>

## Draft National Strategy for Sustainable Development - Public Consultation (sorted by subject)

Section	Source of comments	Comments received	Proposed insertion in the Strategy
1 Introduction	MEPA	Given the desire to engage with a wide audience (and assuming a lack of knowledge in parts of that audience) it might be useful at some stage in the introduction to have a short discussion on what sustainable development is - for the purposes of this Strategy.	Should be inserted
1.3 The Main Benefits of a Sustainable Development Strategy	MEPA	Add the following: 'Another advantage of the strategy would be to serve as a guide and prioritise the actions that should be undertaken locally to ensure the prudent use and management of resources in a way that meets the needs of the present without compromising the needs of future generations, thus contributing to a better life for everyone'.	Should be inserted
2 The Main Directions for Malta	MEPA	Despite the chapter heading, it doesn't really set out the main directions for Malta, nor does it set out a vision – it is a discussion of facets of sustainable development, which is in part philosophical (and therefore not uncontentious because it is set at a (too) general level). A short coherent vision would be quite useful – with broad objectives that could then be followed through into the Strategy.	Should be inserted
2.2 Sustainability is multifaceted	Focus Groups	The importance of non-environmental issues for sustainable development. This suggests that there should be more focus on the social aspects of sustainability in the NSSD.	The social dimension is one of the 3 pillars on which the strategy is based.
2.2 Sustainability is multi-faceted	General Workers' Union	There should be some form of synergy between the three dimensions of sustainable development namely: environmental; economic and social. It would be counterproductive, and indeed may ultimately prove to be unsustainable, to prioritise any one of the three.	Should be inserted
2.2 Sustainability is Multifaceted	Malta Enterprise	Sustainable development should be achieved within the context of the Lisbon Criteria.	Should be inserted
2.2 Sustainability is multifaceted	MCESD	There is need to place development at the centre of the meaning of sustainable development. The strategy does well to emphasise the need for economic development	No need to amend since already included.

2.2 Sustainability is multifaceted	MEPA	The Strategy should indicate the benefits of environmental policy, where we could save money. Government and citizens need to be made aware that environment protection can have significant impacts on the social and economic spheres of Malta's development.	Should be inserted
2.2 Sustainability is multifaceted	MEPA	The Strategy needs to ensure that there is the right balance between its three pillars. Clear guidance is needed with respect to the position of this balance, for example, what environmental resources should be sacrificed for economic and/or social reasons? Also what economic and / social benefits should be sacrificed for environmental reasons? Unless this is clarified we will remain talking about striking the right balance and everybody will continue to have his right balance.	Should be inserted
2.2 Sustainability is multifaceted	MEPA	Many times, certain approaches to the environment are still based on old concepts/views of environment. Environment is still seen as something to be protected in its own. Environment protection should be considered as being part of a country's overall development strategy and part of the normal way of life. Environment protection for many still means what birds to protect, how many trees to plant, which land is not to be built up, how much pollutant is in the air/sea. There needs to be a bridge between the WHAT and HOW MUCH and the WHY of environment protection. For example, less pollutants - better air quality – less health problems - better quality of life for citizens - less pressures on health systems - less stress on finances of the country - more financial resources available for other sectors - enhanced development. Environment protection should not only be an end in itself, but also a means for further development. For example, economic instruments related to environment protection, such as emissions trading and Clean Development Mechanism (CDM) can, if properly taken advantage of, serve as sources of finances for projects that in turn serve to further development	Should be inserted
2.2 Sustainability is multifaceted	MEPA	Arguably too great a burden is placed upon sustainable development in relation to what it is desired to achieve – for example the eradication of poverty and the removal of social injustice, whilst unquestionably desirable, are unlikely to be achieved solely (or at all) through sustainable development – as in the following “This holistic approach requires a long term view of development, and not one based on short term economic gains. It assigns major attention to the integrity of nature, as well as to the eradication of poverty, removal of social injustice and other factors that work against human welfare of current and future generations. For this reason economic development must be planned and executed within a framework that respects environmental capacity constraints and conservation priorities.” Some of the statements in the above need to be revisited – it not clear why the framework needs to respect solely environmental capacity and conservation priorities if one wants to work towards the	Should be inserted

		eradication of poverty etc – in this case these constraints and priorities need to be balanced with other concerns.	
2.3 The Democratic Dimension: Participation is necessary	MCESD	There is need for public support of the strategy to ensure success in its implementation	Should be inserted
2.3 The Democratic Dimension: Participation is necessary	MCST	Pg 11 Para 2 to add: "Apart from public consultation, the full involvement of local and international non-governmental organisations is highly beneficial in view of their ability to provide local capacity building and sharing of experiences"	Should be inserted
2.3 The Democratic Dimension: Participation is Necessary	MEPA	"Public participation ... publics have the democratic right to participate in decisions that affect their lives, locally, nationally and internationally." Unfortunately this isn't actually true in real life yet – it might be appropriate to elaborate here on which decisions the discussion is concerned with.	It is better to leave the statement as general as possible. So no need to amend.
2.3 The Democratic Dimension: Participation is necessary	National Council of Women	Our country will be all the richer if women contribute together with men in making full use of their potential in the economic, social, cultural and environmental spheres.	Should be inserted
2.4 The Ethical Dimension	MEPA	"It is important that scientific and technological developments have, as their central aim, improvement in the quality of life of current generations, without compromising that of future ones." Again it is not clear if this is or could ever be true (of all scientific and technological developments) – improvement in the quality of the life may be in the rhetoric used to justify them but ultimately the creation of surplus value is the central aim of the economic system. Also there is no way of controlling the use of scientific discoveries.	There is no need to amend since it is a generic statement that refers to the ethical dimension.
2.5 The Political Dimension: Integrative Legislation and Policy	MCESD	There is need for integrated action	Should be inserted
2.5 The Political Dimension: Integrative Legislation and Policy	Ministry of Foreign Affairs	Page 12 first paragraph should read: "Sustainable development is multifaceted. In this context, the National Commission for Sustainable Development is a useful and important vehicle for co-operation and effective interface, both at the national and local level, between the various Government Departments and Parastatal Organisations."	Should be inserted
2.5	Ministry of Foreign	Page 12, paragraph 2, perhaps consideration should be given to join the two sentences since they are	Should be inserted

The Political Dimension: Integrative Legislation and Policy	Affairs	referring to the same concept, which is the political dimension of sustainable development.	
2.5 The Political Dimension: Integrative Legislation and Policy	National Council of Women	Citizens need a one stop-shop to address them to the right government department.	Should be inserted
2.5 The Political Dimension: Integrative Legislation and Policy	National Council of Women	Integration of Commissions working on all the aspects of sustainable development is essential.	No need to amend since the National Commission for Sustainable Development aims to have wide representation to do precisely this.
2.6 The International and Regional Dimension	MEPA	Care needs to be taken to ensure that all current international commitments have been taken on board, for example in Section 2.6, all Section 3, 4.3 and 5.3.	Meeting of National Commission for Sustainable Development of 5 <sup>th</sup> December 2005 decided against listing all international commitments in the strategy.
2.6 The International and Regional Dimension	Ministry of Foreign Affairs	Page 12, penultimate paragraph, 4th sentence. It is suggested that the last part of the sentence be deleted, putting a full-stop after WSSD.	Should be inserted
3.1.1 The Main Environmental Challenges	Gozo consultation meeting	One environmental impact leads to other repercussions on other issues.	Should be inserted
3.1.1 The Main Environmental Challenges	Individual	One environmental impact leads to other repercussions on other issues.	Should be inserted

3.1.10 Natural and Technological Risks	Gozo consultation meeting	The country should take into consideration any severe natural hazards that might take place such as for example the effects of climate change and sea level rise.	Should be inserted
3.1.10 Natural and Technological Risks	MCST	Amend/add bullets as follows: Promote awareness among policy-makers and the parties concerned that a major oil spill incident in Malta's territorial waters would have dramatic short and medium term repercussions on Malta's economy.  Ensure that the National Marine Pollution Contingency Plan (NMPCP) is rendered, at all times, readily-implementable.  Put in place further efforts to ensure that the operations of the Civil Protection Department fully complement those of the Armed Forces, the Malta Police and the relevant environmental authorities as stipulated in the Agreement signed between the EU and Malta in March 1990.	Should be inserted
3.1.10 Natural and Technological Risks	MEPA	New bullet: Adopt a national policy on the maintenance of valley systems as part of freshwater storage and flood relief projects" could be included as an additional strategy.	Should be inserted
3.1.11 Enjoying the environment	Gozo consultation meeting	It was noted that noise and light pollution is absent from the draft Strategy.	Should be inserted
3.1.11 Enjoying the Environment	Individual	Something must be done about noise pollution.	Should be inserted
3.1.11 Enjoying the Environment	Focus Groups	Citizens' understandings of environmental issues tend to be wider than expert views, involving also issues of the cleanliness and general upkeep and attractiveness of urban and rural areas. In order to ensure that the Strategy resonates with public environmental expectations, it is suggested that these issues are also given attention in the Strategy.	Should be inserted
3.1.11 Enjoying the Environment	Focus Groups	Some Focus Group participants thought of the environment in positive terms as a place where they could relax and enjoy the beauty of nature or the countryside, other participants thought of pollution, dirt and dilapidation when they thought about the environment. The Strategy will need to address both these perspectives in its environmental section, both protecting what is good so that it can continue to render those services to society, and bringing what is not so good up to acceptable standards.	Should be inserted
3.1.11 Enjoying the environment	Nature Trust	Adopt the Dark Sky Heritage areas as included the Draft Gozo Comino Local Plan – it is important to reduce light pollution especially in coastal areas.	Should be inserted

3.1.2 Air Quality	Gozo consultation meeting	Bio-diesel should be available also in Gozo especially for heavy vehicles.	Should be inserted
3.1.2 Air Quality	Gozo consultation meeting	Pollution from landfills has to be more directly addressed.	Should be inserted
3.1.2 Air Quality	Gozo consultation meeting	There should be ongoing study of transboundary pollution, particularly that originating from Sicily.	Should be inserted
3.1.2 Air Quality	Individual	Amend bullet as underlined: Promote the adoption of new technologies, including mandating use of catalytic converters <u>and encourage people to make more use of the public transport or adapt carpooling practices</u> to affect significant cut-backs in vehicle emissions.	Should be inserted
3.1.2 Air Quality	Individual	New bullet: A review of sea transport between islands is necessary a regular sea link between Mgarr and Sa Maison is far more efficient in the reduction of vehicular movements on main land Malta resulting in less traffic congestions and emissions.	Should be inserted
3.1.2 Air Quality	Individual	The Gozo-Malta Ferry service should concentrate more on Mgarr-Pieta trips in order to cut down on heavy vehicular traffic from the Inner Harbour Area to Cirkewwa.	Should be inserted
3.1.2 Air Quality	Individual	Reduce or eliminate the importation of two-stroke engines. These pollute the sea and air by the emission of oil in droplet form in the exhaust and also create high levels of noise.	Should be inserted
3.1.2 Air Quality	Malta Enterprise	New Bullet: Diversify economy towards the services sectors as opposed to the manufacturing sectors	Should be inserted
3.1.2 Air Quality	MEPA	Will improved “efficiency in electricity generation” per se necessarily improve air quality – surely it is more to do with reducing the emissions from electricity generation, which is not the same thing?	No amendment required.
3.1.2 Air Quality	MEPA	“eco-system” is more commonly written as ‘ecosystem’.	Should be inserted
3.1.2 Air Quality	MEPA	para 2 Has it been scientifically proven that quarrying and building activities are the main contributors to particulate air pollution? What about transport? Particulates from the latter are certainly more biologically active than limestone dust.	No amendment required.

3.1.2 Air Quality	National Council of Women	Marsa and Cottonera must be considered as hot spot for attention of air quality and environmental degradation.	Should be inserted
3.1.2 Air Quality	Nature Trust	Encourage the use and production of Biodiesel especially for use in the agriculture sector.	Should be inserted
3.1.2 Air Quality	Nature Trust	Set up an efficient and regular public transport system exploring the possibility of introducing smaller buses (electric mini vans) or making use of Biodiesel	Should be inserted
3.1.2 Air Quality	MEPA	Greenhouse gas emissions and climate change are cross-cutting issues whose sources are widespread: energy and transport, waste management, industry, land-use change, agriculture. Mitigation and adaptation issues and the political and economic aspects of climate change should also be taken into consideration as they have strong impacts on a country's development. Adaptation to increasing global surface temperatures and anticipated rise in sea-level will have to strongly feature in future development strategies, especially considering the local small island state scenario.	Should be inserted
3.1.2. Air Quality	Nature Trust	Encourage the change to four stroke engines especially i.c.w. petrol marine engines	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Focus Groups	One issue that makes Malta a good place to live is the climate. Malta's climate is a good example of free ecosystems services provided by nature. The Strategy could give more prominence to protecting this excellent feature of Maltese quality of life by prioritising climate change prevention measures.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Gozo consultation meeting	More importance to heating systems and solar energy should be given.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Gozo consultation meeting	The harvesting of wave or wind energy for electricity for small islands can be of benefit.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Gozo consultation meeting	More adequate energy policy is needed for the islands.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Gozo consultation meeting	More efficient street lights are needed.	Should be inserted
3.1.3	Gozo consultation	Using energy from farms is another possibility which can be explored.	Should be inserted

Renewable Resources and Greenhouse Gas Emissions	meeting		
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Gozo consultation meeting	More detailed studies have to be done in the use of resources..	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Gozo consultation meeting	More awareness on such issues has to be implemented	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Individual	Amend as underlined: Drastic reductions in CO2 are likely to be attained through the use of small CHP plants by industry, introduction of electric motors and installation of adequate speed controls, proper dimensioning of air conditioning units and attendant ducting, and further use of compact fluorescent lamps. <u>Installation of solar heaters for domestic purposes should be legally introduced.</u>	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Individual	Amend bullet as underlined Put in place a policy for rapid introduction of renewable energy sources <u>and energy saving equipment for the use of daily activities in our lifestyles.</u>	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Malta Enterprise	Incentives (such as a 0% tax on first three years of operation) could be provided to operators of new renewable energy sources. Although such a fiscal policy discriminates on a sectoral basis, a case may be raised to the European Union for its adoption on the grounds of promoting a cleaner environment.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Malta Enterprise	New bullet: Devise a national educational/awareness campaign across all socio-economic groups to increase awareness on emission hazards.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	MCST	New bullet: More commitment on the part of Government for the promotion of renewables, as market forces alone will not generate their widespread use and development.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	MEPA	Air Quality and Greenhouse gas emissions are an example of where targets (and indicators) should be used – there are clear EU targets in terms of the reduction of greenhouse gases 8% reduction on 1990 levels between 2008 and 2012 although they do not apply to Malta. Nevertheless Malta might have to meet post-Kyoto (i.e. post-2012) targets at some point, so it should gear up to GHG reductions. How is Malta going to get there? We are told for example that greenhouse gas emissions	No amendment required.

		<p>have increased but to what extent? What level is it at now? An indicator on this would help.</p> <p>When we come to 3.1.3 the introduction repeats much of what has been said in the preceding section. This points to the need for a tighter and clearer focus.</p>	
3.1.3 Renewable Resources and Greenhouse Gas Emissions	MEPA	<p>“Direct the construction industry to improve design for thermal efficiency and to adopt energy saving measures prior to being granted development permission.” What is the significance of the second part of this? To what extent does the construction industry have responsibility for design? Really what it points to is the need for Building Regs. which would include requirements on thermal efficiency. A lot of this is directed towards energy saving rather than air quality per se – so why not have a section on energy (use etc).</p>	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	MEPA	<p>Bullet 2 “Take steps to CONTINUE REDUCING greenhouse gas emissions - this will at the same time enable Malta to fulfil its commitments under the “UN Framework Convention on Climate Change”. What is meant by Malta fulfilling commitments under the UNFCCC? Malta does not have any emissions reduction or limitation commitments to date due to its non-Annex 1 party status. Moreover, in the preceding discussion we have been told that emissions are increasing. We do need to reduce greenhouse gas emissions – but how? By how much? Over what timescale? By whom? More solid formulations would be more useful.</p>	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	MEPA	<p>Bullet 3 “Step up funding for research to improve knowledge on local materials and conditions in building and in the use of renewable energy sources.” How does the first part of this relate to the discussion – it does not appear to me to come out from it at all? What precisely do we need to know about the use of renewable energy sources? Could there also be other areas on which we need research?</p>	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	MEPA	<p>With regards to section 3.1.3, maybe it would be better if the two issues are separated in two sections thus:</p> <ul style="list-style-type: none"> <li>• Energy and renewable resources.</li> <li>• Greenhouse gas emissions and climate change.</li> </ul> <p>This section may be emphasizing too much a link between energy and greenhouse gas emissions. While this is true in a local context, mitigation and adaptation issues and the political and economic aspects of climate change have a much wider context, as these will have stronger implications on development in the future across many sectors.</p>	Should be inserted

		Energy is an important sector in the development of a country. It is a sector that is influenced by many other sectors especially in relation to consumption: domestic, industry, mobility, water supply, tourism, etc. While the energy sector is actually the main source for greenhouse gas emissions, it still is just one source of emissions and a cause of climate change, and using renewable sources is just one way of partly reducing greenhouse gas emissions.	
3.1.3 Renewable Resources and Greenhouse Gas Emissions	MEPA	When considering renewable resources, the document could propose promoting also opportunities to make small scale renewable-energy interventions since these also have significant potential to reduce emissions. One example is imposing on owners of new buildings the obligation to install only solar water heaters. The concept of incentives could be advocated for wider use: for example incentives for the purchase of energy efficient appliances can be introduced. These appliances often cost more than their classic equivalents, and so inevitably the majority of consumers buy the latter.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	MEPA	Amend Bullet 1: “Put in place a <u>national</u> policy for rapid introduction of renewable energy sources”. This would highlight the need for national consensus.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Ministry of Health, the Elderly and Community Care	Regulations 594/91, as amended by Council Regulations (EEC) 395/92 and Regulations (EC) 2307/2000 give the legislative basis for the proposed phase out of CFC (chlorofluorocarbons) in Metered Dose Inhalation products (MDIs). The treatment of asthma and chronic obstructive pulmonary disease (COPD) by MDIs containing CFCs has been acknowledged as an essential use. Alternatives to CFC-containing MDIs are now becoming available throughout the European Community. Suitable alternatives include dry powder (DPIs) and MDIs with HFC instead of CFC propellant. Under the rules of the essential uses exemption, CFCs will no longer be authorised for products where acceptable alternatives are available. Before CFC-free MDIs can be prescribed to patients, they need to receive marketing authorisation from the competent authorities. Such authorisation is only granted when the competent authority is satisfied that the proposed alternative product is safe and effective. The switch to new technologies or alternative products could have a negative impact on industry, particularly small and medium-sized enterprises (SMEs)	No amendment required
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Nature Trust	Turn off floodlighting at 1am and avoid other electricity wastage especially in Government buildings (such as schools)	Should be inserted

3.1.3 Renewable Resources and Greenhouse Gas Emissions	Nature Trust	Instead of installing more streetlights explore the possibility of better use of cats' eyes etc for rural country roads.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Nature Trust	New buildings should adopt energy efficient technologies – if research is still needed the a pilot scheme could be launched on a small scale to test these technologies in new buildings or offices. Governmental departments should also help lead the way.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Transport and Energy consultation	New bullet a balance should be found between the costs of introducing alternative fuels and the benefits of the reduction targets.	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Transport and Energy consultation	New bullet changes in behaviour should be promoted through the energy policy to try and reduce energy consumption both in the fields of energy and transport	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	Transport and Energy consultation	replace “take steps to continue reducing greenhouse gas emissions – this will at the same time enable Malta to fulfill its commitments under the UN Framework Convention on Climate Change” with “take steps to reduce greenhouse gas emissions with a long term energy policy which looks at internalizing energy costs”	Should be inserted
3.1.3 Renewable Resources and Greenhouse Gas Emissions	UHM	Clear target should be set about the use of renewable energy in which Malta is lagging behind other Mediterranean countries.	Should be inserted
3.1.3. Renewable Resources and Greenhouse Gas Emissions	Individual	There should be an energy audit of street lighting with the aim of reducing energy consumption by 10%, thus leading to a reduction in Greenhouse Gas Emissions.	Should be inserted
3.1.3. Renewable Resources and Greenhouse Gas Emissions	Nature Trust	Mandatory use of energy efficient street lighting to replace current fixtures which are often inefficient and which are the cause of extensive Light Pollution	Should be inserted
3.1.4 Fresh Water	Gozo consultation meeting	Pollution, from pesticides used for agricultural purposes, has to be studied, in more details, for organic purposes.	Should be inserted
3.1.4	Gozo consultation	There is urgent need of damming water from valley streams plus the exploring of possibilities of	Should be inserted

Fresh water	meeting	creating more underground storage of water.	
3.1.4 Fresh water	Gozo consultation meeting	Spring water should be more sensibly used.	Should be inserted
3.1.4 Fresh Water	Gozo consultation meeting	Second class water is going to be used for agriculture purposes but it can be used for other purposes including perhaps hotel use and industry. A more efficient use of this water has to be encouraged.	Should be inserted
3.1.4 Fresh Water	Gozo consultation meeting	A strong policy (and enforcement) for the protection for groundwater is vital.	Should be inserted
3.1.4 Fresh Water	Gozo consultation meeting	Big projects on the islands have to be studied carefully as they consume a lot of water resources. For example, projects, as in the case of Golf Courses, that would eventually need large amounts of water to maintain should be well studied before permission is granted. (Of course other environmental considerations would have to be taken.	Should be inserted
3.1.4 Fresh water	Gozo consultation meeting	Illegal water extraction has resulted in the need of building more Reverse Osmosis Plants	No amendment required.
3.1.4 Fresh Water	Individual	Amend bullet as underlined: Encourage <u>efficient</u> further water conservation measures, including the use of cisterns, and further enforce regulatory measures with regard to illegal abstraction.	Should be inserted
3.1.4 Fresh Water	Individual	New bullet Illegal abstraction of the water resources should be monitored and enforced	Should be inserted
3.1.4 Fresh Water	Individual	Amend bullet as underlined: Optimise the use of second class water <u>with a particular reference to the hotel industry.</u>	Should be inserted
3.1.4 Fresh Water	Individual	Malta Resources Authority has not even brought out its policy on Groundwater months after a consultation exercise, and has not even licensed WSC to supply water after over a year. This is a weakness from an institution which raises concerns about the implementation of any strategy.	Should be inserted
3.1.4 Fresh Water	MEPA	There should be mention of a strategy to control the illegal groundwater abstraction and its associated negative effects.	Should be inserted
3.1.4 Fresh Water	MEPA	“Unsustainable water consumption patterns need to be checked. Furthermore stakeholders’ requirements and the relative costs and benefits accrued, as well the value of the externalities	Should be inserted

		generated by their use, need to be taken into account.“ It is not clear what this means – which stakeholders? Does this means users? Consumers? Taken into account in what? Decisions on whether to check unsustainable water consumption patterns? This could be clarified.	
3.1.4 Fresh Water	MEPA	The “strategic directions” are a mixture of actions and strategy – no. 5 would, for example, be one action to achieve no. 1 – similarly 4 and 2. It is not clear at all how no. 3 fits in here – it is not referred to in the discussion.	Some directions are strategic; others are less strategic.
3.1.4 Fresh Water	MEPA	“safeguard the quality of freshwater resources so as to protect human health, and satisfy the requirements for human use” – Apart from satisfying the requirements for human use, freshwater resources support a range of organisms, many of which are rare. Safe-guarding such resources is beneficial to humans, however, freshwater resources should be safeguarded first of all because of their inherent value.	Should be inserted
3.1.4 Fresh Water	MEPA	P3 Enforcement should be the key tool to combat illegal abstraction of ground water, in order to conserve this resource. It is not very useful to introduce other conservation measures, such as economic incentives or disincentives, prior to improving the current enforcement systems, as illegalities will keep on occurring. Efficiency should be improved by first targeting current systems and then introducing new ones.	Should be inserted
3.1.4 Fresh Water	Ministry of Health, the Elderly and Community Care	Groundwater supplies and its control falls under the responsibility of the Malta Resources Authority while the quality of Drinking Water intended for Human Consumption falls under the responsibility of the Department of Public Health following the transposition of the EU related Directive by L.N. 23 and L.N. 116 of 2004. This Department is currently working together with the MRA and WSC to achieve the required quality for drinking water.  The Department of Public Health has also issued a new regulation under the Food Safety Act related to private water supplies intended for human consumption i.e. water being distributed by water tankers as water ‘fit for drinking’. These private water supplies have to be registered with the Department of Public Health following applicants providing relevant information in view of water quality as per schedules in L.N. 116 of 2004.  As regards to the use of second class water the Department of Public Health has always made it clear that this water (even water from cisterns) may only be used for flushing and washing of floors and not for domestic personal use.	Should be inserted
3.1.4	Nature Trust	A drive to eliminate any remaining illegal extraction of freshwater	Should be inserted

Fresh Water			
3.1.4 Fresh Water	Nature Trust	Strict and continuous monitoring of pesticide and nitrate levels in freshwater springs, galleries and aquifers	Should be inserted
3.1.4 Fresh Water	Nature Trust	Abandoned quarries which have not been used for dumping can be turned into large underground water storage units which can also be roofed and used for organic farming or restored to a natural habitat	Should be inserted
3.1.4 Fresh Water	Nature Trust	Roads should have adequate channels to direct water in underground cisterns/reservoirs	Should be inserted
3.1.4 Fresh Water	Nature Trust	Some valleys should have their valley bed reinstated by removing present roads and closing them off from vehicular traffic (unless required for farming purposes in which case some form of suitable bridges could be devised to allow access to fields)	Should be inserted
3.1.4. Fresh Water	Individual	The country should soon have significant quantities of second class water available from sewage treatment plants. A drive should be initiated for Industry, especially hotels and factories, to use this water for cleaning and other non-culinary uses.	Should be inserted
3.1.4. Fresh Water	Nature Trust	It is hoped that the planned sewage treatment plant will be of a high enough standard which uses good and efficient technology to produce a viable source of second class water.	Should be inserted
3.1.5 Nature and Biodiversity	Gozo consultation meeting	Conservation of the specific sites has to be adequately done. It is not enough to conserve certain sites as has been done, but there needs to be on going monitoring of the situation of each particular area.	Should be inserted
3.1.5 Nature and Biodiversity	Gozo consultation meeting	Not only the protection of the various species is needed but also of the habitat around it. -This is vital.	Should be inserted
3.1.5 Nature and Biodiversity	Individual	Amend bullet as underlined: Promote and fund research to gain a better understanding of local biodiversity, including the establishment and funding of a national inventory/database of biodiversity. <u>Public awareness and education on the subject are necessary.</u>	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	Para 5. Insert the following after first sentence: Such an environmental campaign should target a wide-range of stakeholders.	Should be inserted

3.1.5 Nature and Biodiversity	MEPA	P4 The Strategy contains a number of prescriptive statements, some of which are already being implemented. For example on page 18, statements indicate that management plans need to be written for every SAC, however the preparation of such management plans is already in progress, and some have already been finalised.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	Bullet 1 Endemic species are already legally protected in Malta. It is also important, before proposing new measures, to ensure that measures currently in force are being fully implemented and enforced, in order to be sure that new measures will indeed be effective. Furthermore it is also important to ensure that any new measures do not act in a counter-productive manner with respect to existing measures.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	“The total area of protected terrestrial habitat on the Maltese Islands is small relative to the total surface area”. Is this true?	‘small’ has been amended to ‘respectable’.
3.1.5 Nature and Biodiversity	MEPA	On GMOs, Malta now has a policy, which is to take things on a case-by-case basis, in line with EU policy.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	On page 19, the text should mention Natura 2000 and Bullet 2 in particular should include it.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	The Strategy should mention the fact that Malta is now preparing a National Biodiversity Strategy	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	No strategic direction is envisaged to counteract the negative impacts of development on biodiversity. An additional strategic direction could be included reading “adopt an official policy on the assessment of development with regards to protected areas” Alternatively, this could be included as a strategic direction to section 3.1.8.	This is already included in the Environmental Impact Assessment Regulations.
3.1.5 Nature and Biodiversity	MEPA	New Bullet Set up a National Biodiversity Strategy for Malta based on the aims of the Convention of Biological Diversity that is, conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources. These goals are key elements of sustainable development.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	Bullet 1 “ <i>Monitor and legally protect .... and take active measures for their conservation</i> ” should read “ <i>Monitor and legally protect .... and take active measures for their favourable conservation and restoration</i> ”. N.B. Rare and/or threatened endemic species are already legally protected by L.N. 257/03 and L.N.	Should be inserted

		12/01 amongst others – enforcing is another issue. To add: <i>This will entail the allocation of financial, physical and human resources to enable effective short-term and long-term monitoring as well as in order to undertake <u>in-situ</u> and <u>ex-situ</u> conservation (e.g. propagation, habitat restoration, containment, control or eradication of invasive alien species and reintroduction programmes of native species).</i>	
3.1.5 Nature and Biodiversity	MEPA	Bullet 2 “Designate habitats.....to protect these habitats” seems to be a mistaken phrase. Perhaps this should read “Designate further protected areas (including Marine Protected Areas).....to protect the important habitats within them from incompatible development.” Then, “and to manage them” should be deleted and a further bullet included re the preparation of management plans: “Draft and implement appropriate management plans in order to protect the 31 Candidate SACs of International Importance; drafting and implementation should be completed prior to the deadlines set by EU“.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	Bullet 5 “ <i>Adopt an official policy on the introduction of alien species ...</i> ” should read “ <i>Adopt an official policy on the introduction/ eradication of alien species ...</i> ” An official policy on GMOs was introduced once Malta joined the EU and consequently Should be inserted Directive 90/219/EEC and Directive 2001/18/EC. The policy is mainly based on the precautionary principle and on the assessment of applications on a case-by-case basis. According to the legislation, the main interests and concerns relate to the protection of the environment and human health. Therefore, GMOs should be placed in a separate bullet.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	Bullet 6 This could be divided as follows: “Promote and fund research in order to gain a better understanding of local biodiversity.” Another bullet “Hasten the process for the establishment of a National Database on Biodiversity, especially by obtaining the human and financial resources necessary for its compilation.” Another possible bullet: “Draft and implement a Research Policy.”	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	Bullet 7 This could read as follows: “Devise schemes and programmes to improve awareness on local biodiversity, highlighting its uniqueness and importance; as well as to make people aware of the invasive alien species present across the islands, clearly indicating their negative impacts.”	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	P1/L1 To add: Such an environmental campaign should target a wide-range of stakeholders. Moreover, environmental issues on the local scene should be included in scholastic curricula in order to educate students of all ages and hence make them aware of the problems and threats faced by local biodiversity.	Should be inserted
3.1.5	MEPA	P1/L1/2	Should be inserted

Nature and Biodiversity		To add: In addition, the intrinsic value of local biodiversity is not much appreciated by the Maltese community. This lack of appreciation might stem from a lack of knowledge and interest. Local communities are not aware of the role biodiversity has in ecosystem functioning and also its importance in the provision of services.	
3.1.5 Nature and Biodiversity	MEPA	P1/L3 “Biodiversity is the basis of local ecosystems’ functionality”. To add: “Biodiversity is indispensable to sustain life on earth. Loss of biodiversity i.e. irreversible loss of species and ecosystem processes, entails a loss of scientific discoveries, potential new medicines and food sources, which are dependent on the variety of species”.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	P1/L4 “In fact, a number of endemic species are of evolutionary and biogeographical interest, some being relics of past Mediterranean flora and fauna, whereas others are unique to these islands – their study is therefore of significant scientific importance” could be rephrased as: “A number of endemic species, that is, unique to the Maltese Islands, and also sub-endemic species, are not only of scientific importance, but also of evolutionary and biogeographical interest, whereby some species are also relics of the past Mediterranean”.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	p19 P2/L1 To add words in italics: Exploitation, <i>whether illegal or unregulated</i> , of a number of wildlife....	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	p19 P2/L2 “(and in some cases possibly increased)” might be better rephrased as ‘(and in some cases possibly increasing)’	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	p19 P3/L4 The involvement of NGOs in the management and administration of protected areas is indeed commendable. However, since there aren’t many NGOs involved in such work, other organisations/private companies/ consortia should be involved too so as to alleviate the workload of NGOs. A tender may be issued so that interested parties are given the opportunity to be involved.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	P2 “Environment Protection Directorate” should read “Malta Environment and Planning Authority” as referred to on page 19 3 <sup>rd</sup> paragraph.	Reference has been removed.
3.1.5 Nature and Biodiversity	MEPA	P2/L3 After “....species remain under threat” insert “ <i>by human-mediated activities (e.g. overexploitation, illegal capture and killing, development), and also due to the consequences of such activities (e.g. loss and degradation of habitat, fragmentation, pollution, disruption of food webs, erosion, eutrophication) bringing about changes in ecosystems</i> ”.	Should be inserted
		The paucity of data available on species at risk and their exact status impedes their proper	

		management and conservation. It is also stated that enforcement of existing regulations is lacking. This is incorrect, because enforcement does take place. <i>Resources</i> for enforcement are lacking rather than enforcement itself.	
3.1.5 Nature and Biodiversity	MEPA	P2/L5 “require considerably more resources”: the resources necessary should be identified more clearly; they certainly include human and financial resources, among others.	The issue of resources is a general theme throughout.
3.1.5 Nature and Biodiversity	MEPA	P3 General comment: GMOs should be dealt with separately from alien species, because even though certain principles are similar, the procedural systems applied to the former are completely distinct from those relating to alien species.	There is no need to amend since the reference in the text just relates to the importance to address the negative effects of GMOs and alien species.
3.1.5 Nature and Biodiversity	MEPA	P3/L1 “The introduction of alien species into local ecosystems continues to be of serious concern”. Add the following: <i>It is widely documented globally that human mediated activities namely trade and tourism, facilitate the entry and transfer of these species into new environments. Once alien species are introduced either deliberately or accidentally into the environment they can become established. In certain cases alien species start to compete with native species in which case they become invasive, whereby they become the dominant species or replace keystone species. Invasive alien species involve and affect a wide range of social, environmental and economic activities as well as public health.</i>	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	P3/L6 “Malta should ratify and implement the Cartagena Protocol on Biosafety in order to prevent any possible invasive behaviour of GMOs.” This comment should be included in the box “Main strategic directions....” of page 19, and should read as follows “ <i>Malta should ratify and implement the Cartagena Protocol on Biosafety in order to control transboundary movements of GMOs between countries with the aim to provide a comprehensive and holistic approach to the conservation of biological diversity, the sustainable use of natural resources and the fair and equitable sharing of benefits deriving from the use of genetic resources</i> ”.	Should be inserted
3.1.5 Nature and Biodiversity	MEPA	P3/L6 It is suggested that the following text is added: “ <i>Applications to deliberately release or place on the market GMOs are reviewed and evaluated on a case-by-case basis and by means of a thorough</i>	Should be inserted

		<i>scientific assessment.”</i>	
3.1.5 Nature and Biodiversity	MEPA	P4/L3 “There are still no marine protected areas” should read “ <i>Although no marine site has been officially designated a marine protected area, the area from Rdum Majjiesa to Ras ir-Raheb has been proposed as the 1<sup>st</sup> marine protected area in the Maltese Islands</i> ”. However, it should here be specified that the marine area around Filfla is protected. Details can be found in GN 173/90 – No Berthing Zone / No Entry Zone except for Fisheries.	Should be inserted
3.1.5 Nature and Biodiversity	Nature Trust	Set up a green warden system to patrol all rural areas and coastal zones	Should be inserted
3.1.5 Nature and Biodiversity	Nature Trust	Revise the current list to include important habitats such as Il-Qortin tal-Magun, Isopu and Ta Cenc	Should be inserted
3.1.5 Nature and Biodiversity	Nature Trust	Devise a program for control of existent alien invasive species	Should be inserted
3.1.5 Nature and Biodiversity	Nature Trust	As a precautionary approach Gozo and Malta should be a strict GMO-free zone	This contrasts with the proposal by MEPA to adopt a case-by-case approach in relation to GMOs.
3.1.5 Nature and Biodiversity	Nature Trust	Ban spring hunting and trapping	There is an international obligation as part of the EU Treaty dealing with this issue.
3.1.5 Nature and Biodiversity	Nature Trust	Discourage land reclamation in ecological areas by encouraging the re-use of recently abandoned fields	Should be inserted
3.1.5 Nature and Biodiversity	Nature Trust	Encourage Organic farming, Land Stewardship and the use of ecological corridors	Should be inserted
3.1.5 Nature and Biodiversity	Individual	The dwindling areas of Garigue, Sand dunes, Cliff faces and other endangered habitats should be protected by the adaptation of suitable laws and effective enforcement policies. Laws to control Off roading, Camping and Abseiling are just an example.	Should be inserted

3.1.5 Nature and Biodiversity	MEPA	p19 P3/L2 “an extensive network of 31 Special Areas of Conservation” It should here be specified that these are “31 <b>Candidate SACs of International Importance</b> ” and possibly it should also be stated that another 7 SACs of <b>National Importance</b> have been designated (38 SACs in all). Also, note that the 31 Candidate SACs of International Importance amount to 12.46% of the area of National Territory.	Should be inserted
3.1.5. Nature and Biodiversity	Nature Trust	Set up the required management plans for SAC and Proposed Natura 2000 sites	Should be inserted
3.1.6 Wastes	Ministry of Health, the Elderly and Community Care	The Ministry of Health, the Elderly and Community Care has committed itself to replace the incinerator at St Luke’s Hospital. This has been considerably delayed due to tender/contractual issues. St Luke’s Hospital has to date received two enforcement notices from the MEPA for the decommissioning of the incinerator. A new tender process is proceeding.	Should be inserted
3.1.6 Wastes	Gozo consultation meeting	There can be more effective waste management especially of the building rubble.	Should be inserted
3.1.6 Wastes	Gozo consultation meeting	Waste can be a useful resource. One should invest more on how this can be this achieved.	Should be inserted
3.1.6 Wastes	Gozo consultation meeting	The collection of domestic waste has to be reviewed.	Should be inserted
3.1.6 Wastes	Gozo consultation meeting	Sewage should be treated before discarded or reused. The strategy has to cater for a balance between the development and the usages of the treated sewage.	Should be inserted
3.1.6 Wastes	Gozo consultation meeting	We need to study how to generate less waste. Then we need to act accordingly.	Should be inserted
3.1.6 Wastes	Individual	A certain amount of so called “rubble waste” is a resource. Used masonry blocks can be utilized for the weights used in Lampuki fishing as one example. A tax on new stone and subsidy on used stone will adjust prices making the re utilization of used stone economically practicable.	Should be inserted
3.1.6 Wastes	Manufacturing Industry Consultation	The setting-up of a <i>waste-to-energy</i> plant to help with finding a solution to solid waste.	Should be inserted
3.1.6 Wastes	MEPA	According to the Waste Management Strategy, the primary waste management option is still landfilling. Is this sustainable or should we look elsewhere?	The Waste Management Strategy is being updated.

3.1.6 Wastes	MEPA	New Bullet: The treatment and reuse of wastewater is a major EU policy direction.	Should be inserted
3.1.6 Wastes	MEPA	Bullet 6 Rephrase along these lines: “Improve enforcement and strengthen deterrence with regard to illegal tipping.”	Should be inserted
3.1.6 Wastes	MEPA	Para 4 This says that separation at source from households has yielded a high percentage of recoverable material. Is this correct? Can it be substantiated?	
3.1.6 Wastes	MEPA	Quite a few of the strategic directions are (a) detailed actions, and (b) largely planned, underway or carried out. Again there is a need for indicators so the reader is aware of the scale of the problem and what is happening – and for targets – it is fine to say “encourage waste prevention, minimisation, reuse and recycling” but there should be targets for these and for final disposal to land fill with timescales – then it would be clear what the strategic direction is. Strangely there is no mention of inert waste from “development” which in terms of volume is the major source of “waste”.	Should be inserted
3.1.6 Wastes	Ministry of Health, the Elderly and Community Care	Although the disposal of pharmaceutical waste has been of major concern during the past few years this section of the report fails to mention this aspect. In the area of pharmaceuticals an alternative strategy for waste disposal needs to be in place because waste should not be allowed to accumulate at source.  Prior to accession into the EU, pharmaceutical waste was either incinerated or disposed of in the Maghtab landfill. It had been identified that this situation could no longer be tolerated and the Ministry of the Environment, in collaboration with the Ministry of Health, had embarked on a project whereby pharmaceutical waste would be collected, sorted and exported for its proper disposal. This project has not materialized yet. It is of prime importance that a system for the disposal of pharmaceutical waste be identified since at present such waste is accumulating at source. Local manufacturing companies have their own systems of exporting such waste.	Should be inserted
3.1.6 Wastes	Ministry of Health, the Elderly and Community Care	As regards domestic waste the only involvement by the Department of Public Health is through the processing of the Malta Environment and Planning Authority’s applications and the review of related Environment Impact Assessments (EIA). The main concern highlighted in the report is the upgrading of the non-compliant incinerator at St. Luke’s Hospital.	Should be inserted
3.1.6 Wastes	Ministry of Health, the Elderly and	As regards liquid waste, this is still being discharged without any treatment into the sea. This directly affects certain bathing areas negatively. Once the new proposed three sewage treatment plants are	Should be inserted

	Community Care	<p>installed and running this should have a positive result on the already well classified bathing water quality. This will eventually help in view of the new proposed bathing water directive.</p> <p>In view of the reuse of effluent water which would be available in large quantities once these three sewage treatment are functioning at their maximum capacity (i.e. treating all the sewage), this has to be discussed with the competent authorities on its actual uses. Use of this water will depend on its final chemical and microbiological quality.</p> <p>Continuous upgrading and improvement of the main sewerage systems has to be on-going as most of the main sewers are very close to our bathing areas and once a stoppage occurs this would immediately find itself into our bathing areas which would have an immediate health impact on bathers. The size of the sewerage system has to be of a size to cope with the influx of local summer residents and tourists at the peak season at particular localities.</p>	
3.1.6 Wastes	Moviment Graffitti	The importance of waste separation at source (for example, in households) should be emphasized.	Should be inserted
3.1.6 Wastes	Moviment Graffitti	More bring-in sites should be introduced around Malta and Gozo	Should be inserted
3.1.6 Wastes	Moviment Graffitti	Enforcement against fly-tipping, disposal of waste in roads and the countryside, disposal of waste by households and commercial establishments (f.eg restaurants and nightclubs) at night should be increased.	Should be inserted
3.1.6 Waste	National Council of Women	Waste separation is useless if the waste is then again lumped all together. Households need to feel comfortable that waste that is being separated is recycled.	
3.1.6 Wastes	Nature Trust	Waste consisting of used cooking oils should be collected even at household level.	Should be inserted
3.1.6 Wastes	Nature Trust	Is there a policy for collection of organic household waste and for all other waste streams which are not suitable for the bring in sites?	Should be inserted
3.1.7 Marine and Coastal environment	Focus Groups	One issue that makes Malta a good place to live in is the seaside. The Strategy could give more prominence to protecting this excellent feature of Maltese quality of life by protecting coastal areas.	Should be inserted
3.1.7	Individual	There is a need for an environmental hazards plan, in particular due to the heavy oil tanker traffic in	Should be inserted

Marine and Coastal Environment		the central Mediterranean.	
3.1.7 Marine and Coastal Environment	MEPA	Bullet 4 Marine conservation area – should this be <i>marine protected area</i> for uniformity’s sake?	Should be inserted
3.1.7 Marine and Coastal Environment	MEPA	p. 22 para 2 / L5 <u>Marine and Coastal Environment</u> : The word “organisations” seems out of place – could the word be <i>organotins</i> ?	Should be inserted
3.1.7 Marine and Coastal Environment	Nature Trust	Create a Marine protected area around Comino and designate other areas for zonation and management – for instance sensitive sites which are probably important nesting and nursing grounds for fish such as at Hondoq ir-Rummien should be safeguarded from development and from boat anchoring	Should be inserted
3.1.7 Marine and Coastal Environment	Nature Trust	Protect the coastal landscape from further development such as yacht marinas and tourist complexes	Should be inserted
3.1.7 Marine and Coastal Environment	Nature Trust	Allow public access to all parts of the coast	Should be inserted
3.1.7 Marine and Coastal Environment	Nature Trust	Moratorium on new tuna farms or extensions of present ones.	Partly Should be inserted stating that “the effects of fish-farming and tuna-penning need to be further studied so that the evidence gathered can serve as a guide for possible future granting of permits.
3.1.7 Marine and Coastal Environment	Nature Trust	There has been a long felt need for a coastal and marine wardening system at sea to curb illegal fishing, hunting, dumping etc and to deal with marine protected areas which should be on the increase	Should be inserted

Environment		in the near future.	
3.1.7. Marine and Coastal Environment	Nature Trust	Introduce legislation to ban spearfishing carried out with the aid of SCUBA equipment	Should be inserted
3.1.8 Land Use	Focus Groups	<p>Two areas do not emerge strongly in the environmental section (3.1) of the Strategy. These are</p> <ul style="list-style-type: none"> <li>• Historical heritage (particularly in the inner harbour area)</li> <li>• Local environmental quality (including issues related to dilapidation, shabbiness and littering – the ‘embellishment’ issue).</li> </ul> <p>Even though these issues do not necessarily affect the long-term viability of the planet’s life support systems, they do affect the way people feel about the place they live in. They are important contributors to the sense of what makes Malta what it is, and therefore to the pride people take in their surroundings, including the natural environment by extension. Historical heritage was the most prized feature that participants thought made Malta a good place to live in and the two issues also emerged strongly when participants were asked to prioritise. It is therefore recommended that both the issues of heritage protection and local environmental quality be given more attention in the Strategy.</p>	Should be inserted
3.1.8 Land Use	Construction Consultation	Resources on Site, ie build using stone quarried on site thereby saving on quarrying activities, transport and generating a new philosophy regarding building (traditional knowledge). Eg Mater Dei site was a good quarrying site and material was dumped.	Should be inserted
3.1.8 Land Use	Construction Consultation	Encourage of adaptation of existing buildings and reuse and recycle existing materials through incentives eg granting certain advantages to buildings that reuse and recycle materials (e.g. tax credits)	Should be inserted
3.1.8 Land Use	Construction Consultation	Land reclamation viewed positively, but should be done with caution due to environmental sensitivity. Areas not environmentally sensitive should be selected.	Should be inserted
3.1.8 Land Use	Construction Consultation	Encourage research on reuse and recycling of construction material.	Should be inserted
3.1.8 Land Use	Construction Consultation	It is important to educate all parties involved in construction (architect, developer, contractor, end-user) in incorporating sustainable practices in their trade or profession.	Should be inserted
3.1.8	Construction	Right of initiative and support for ventures promoting sustainable development.	Should be inserted

Land Use	Consultation		
3.1.8 Land Use	Construction Consultation	A new section of the sustainability of the built environment which would include land use and construction, maybe including it in section 3.1 and 3.2	Amendment not made.
3.1.8 Land Use	Construction Consultation	The lack of structure plan which is not approved creating uncertainty as what constitutes “legal development”.	Probably refers to local plan. Should be inserted in the context of local plan sense.
3.1.8 Land Use	Gozo consultation meeting	As regards land efficiency it was suggested that this should be administered more properly, especially in the planning of residential, office and other buildings. The authorities concerned should consider changing the structure plan for buildings, such that permits for buildings with more storeys than the existent should be issued. Malta being a small island has land space constraints and it would be more beneficial for the people if buildings were to consist of more storeys, thus utilizing more air space rather than land. Better planning to manage land-use more efficiently is required.	Should be inserted
3.1.8 Land Use	Gozo consultation meeting	Renovation of existing buildings	Should be inserted
3.1.8 Land Use	Gozo consultation meeting	Reuse of natural resources such as the Maltese stone in the construction industry, should be encouraged.	Should be inserted
3.1.8 Land Use	Gozo consultation meeting	Better accessibility should be made to land suitable for agriculture.	Should be inserted
3.1.8 Land Use	Gozo consultation meeting	There should be a study regarding the prevention of very high buildings in Gozo.	Should be inserted
3.1.8 Land Use	Individual	After ‘coastal location’ in para 5 insert “Common restoration environmental plans should be a priority”.	Should be inserted
3.1.8 Land Use	Individual	New Bullet: The protection of the landscape has also to be defined as this is one of the unique visual aspects which the island has. This should be enforced most on the island of Gozo where urban development is not so widespread as the main land Malta.	Should be inserted

3.1.8 Land Use	Malta Enterprise	New bullet: Develop sectoral benchmark typologies of commercial/industry units and employment densities and develop incentives for industry to keep within the established benchmarks	Should be inserted
3.1.8 Land Use	Malta Enterprise	New bullet: Encourage the Development of Industries with high value added and high employment densities;	Should be inserted
3.1.8 Land Use	MEPA	P1 Land should be provided to preferred waste management activities eg. storage prior to treatment and recycling.	Should be inserted
3.1.8 Land Use	MEPA	P2 / L2 Figures for the number of cars need to be update since this has grown since 2000.	Should be inserted
3.1.8 Land Use	Ministry for Urban Development and Roads	Urban Development and regeneration projects should be sustainable in the economic, social and environmental contexts and seen as helping regenerate the Maltese Islands. A national urban development policy for the Maltese Islands that will provide guidance for the formulation and delivery of all urban development initiatives should be designed and promoted. Urban Development and regeneration projects should conform to Malta's Structure Plan and local plans	Should be inserted
3.1.8 Land Use	Moviment Graffiti	Fiscal measures such as tax on vacant property should be introduced to penalize speculation and discourage property-owners to leave property vacant.	The principle, though not particular to property, is included section 3.4.3 <i>Promoting the Use of Economic Instruments</i>
3.1.8 Land Use	National Council of Women	Use of brown field instead of green fields must be encouraged. Multi-storey buildings must be encouraged.	Should be inserted
3.1.8 Land Use	National Council of Women	Use of brown fields should not result in loss of village core buildings.	Should be inserted
3.1.8 Land Use	National Council of Women	Rent laws that do not allow low rented properties to be used profitably are resulting in empty property.	Should be inserted

3.1.8 Land Use	National Council of Women	Empty properties are resulting in environmental degradation due to such properties being used to dump waste.	Should be inserted
3.1.8 Land Use	Nature Trust	Designate one degraded site for high impact activities such as offroading, mass abseiling etc – this could be part of a quarry re-use scheme	Should be inserted
3.1.8 Land Use	UHM	The feasibility of land reclamation should be examined in order to decide whether it should feature in a strategy about Sustainable Development.	Should be inserted
3.1.8. Land Use	Nature Trust	Identify public footpaths and routes for people wanting to walk through the countryside and curb all illegal RTO and closed access paths.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Focus Groups	Although transport is under the environment section this does not quite reflect the common understanding of transport with the focus group participants. Their concerns included the quality of roads, traffic congestion, as well as the need for sustainable alternatives to the private car. This matter could be resolved by placing transport under cross-cutting strategic issues, since transport could fit equally under all three typical pillars of sustainable development (environment, society – the accessibility aspect - and economy).	The cross-cutting issues that the strategy refers to deal more with different aspects of how to make things happen.
3.1.9 Promoting a Sustainable Transport System	Gozo consultation meeting	Transport should be better organised and better channeled for daily working activities. Heavy duty trucks should be restricted from going through particular routes especially those circulating around the village core.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Gozo consultation meeting	Teleworking, and the introduction of more electricity vehicles, in the future, can also alleviate the traffic congestion problem.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Kummissjoni Nazzjonali Anzjani	Il-hajja ta' l-anzjani tista tkun affetwata positivamente kemm-il darba jsiru zviluppi godda u komdi fit-trasport. In-nuqqas ta' mobilita kemm għall-anzjani kif ukoll għal persuni b'disabilita jikkagunaw frustrazzjoni fl-aspirazzjonijiet tagħhom. Access tajjeb għat-trasport huwa għodda tajba biex tassigura l-indipendenza u l-partecipazzjoni soċjali għal din il-kategorija tal-popolazzjoni.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Malta Enterprise	New Bullet A detailed study on commuting in Malta should be carried out to establish critical routes and peak times of traffic and develop alternative transport alternatives to these destinations.	Should be inserted

3.1.9 Promoting a Sustainable Transport System	Malta Enterprise	New Bullet Promote use of Public Transport and upgrade level of service provided	Should be inserted
3.1.9 Promoting a Sustainable Transport System	MEPA	Bullet 3 Is the Strategy being referred to the NSSD or the Integrated Transport Strategy?	Strategy referred to is the National Strategy for Sustainable Development.
3.1.9 Promoting a Sustainable Transport System	MEPA	Emphasis is made on the need for better public transport system and traffic management. Another important issue in the local context would be reducing the average age of vehicles on local roads through incentives or economic measures to remove older vehicles from use.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Ministry for Urban Development and Roads	Malta should plan and provide for a sustainable, high quality, safe, integrated, and efficient land transport system that will meet people's travelling needs in Malta within the national framework of sustainable development characterized by economic development, social inclusion, and protection of the environment. In this regard, Malta should set out a 10-year land transport strategy for the Maltese Islands, the aim of which is <i>Sustainable Mobility</i> . Research, Policy changes, Education and Enforcement all play an important role in this regard.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Ministry for Urban Development and Roads	Public transport should be improved to help achieve modal shift from private to public transport modes. This can be achieved through review of the public transport administration; re-organisation of public transport operations; bus infrastructure upgrade; and encouragement of multi-modal trips. Non-essential car usage should be restrained through parking management; employment schemes; car access restrictions; integrated land use and transport planning; road infrastructure and role of authorities and local councils. Alternative, safer and healthier forms of transport such as walking and cycling should be promoted.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Ministry for Urban Development and Roads	Infrastructure should be accessible to all.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Ministry for Urban Development and Roads	Fiscal incentives and disincentives should be introduced to help ensure effective transport policy and implementation.	Should be inserted
3.1.9 Promoting a Sustainable	Ministry for Urban Development and	In the White Paper European Transport Policy for 2010, there is mentioned that the Commission proposes to place an emphasis on exchanges of good practice between member states, aiming at	Should be inserted

Transport System	Roads	making better use of public transport and existing infrastructure. This may be effective with member states which are reported to be reluctant about action at community level. This exchange of good/best practice may also help Malta in its national strategy for sustainable development (International and Regional Dimensions), in this case in the transport sector.	
3.1.9 Promoting a Sustainable Transport System	Ministry of Health, the Elderly and Community Care	New Bullet Integrate environment and health dimensions into transport policies in achieving sustainability and reducing transport related disease burdens.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Ministry of Health, the Elderly and Community Care	Insert at the end of para 1: “There is also and increasing awareness of the health risks and effects of transport, suggesting an increased urgency for action to reduce these effects and related risks. The integration of environment and health dimensions into transport policies is necessary for achieving sustainability and reducing the disease burden.”	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Nature Trust	See point 3 of Nature Trust’s comments in section 3.1.2.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Transport and Energy consultation	Replace ‘it also has significant environmental implications due mostly to congestion and polluting emissions’ with ‘it also has socio-environmental implications related to pollution, congestion and exclusion’.	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Transport and Energy consultation	The following short definition of sustainable transport should be should be inserted at the beginning of the section: ‘Sustainable transport is defined as a transport system which caters for the current needs and safeguards the needs of future generations. In order to achieve this, four inter-related objectives are defined:  - achieving modal shift - improving road safety - achieving healthier travel - making infrastructure accessible to all.’	Should be inserted
3.1.9 Promoting a Sustainable	Transport and Energy consultation	last paragraph should be replaced with ‘The Government should adopt a road safety strategy which looks at the various aspects of road	Should be inserted

Transport System		design, user behaviour and motor vehicle technologies to reduce the number of injured and killed on the road and try to improve the roadside environment for all users, including pedestrians and cyclists'	
3.1.9 Promoting a Sustainable Transport System	Transport and Energy consultation	New bullet: 'a car restraint policy should be Should be inserted to restrict cars in town centres where the impact of traffic and congestion is greatest'	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Transport and Energy consultation	New bullet a sustainable transport policy should aim at internalizing as much as is possible all external costs of transport including environmental and social costs	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Transport and Energy consultation	new bullet a balance should be found between the economic benefits of tourism and the impacts of tourism transport as they effect negatively sustainability	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Transport and Energy consultation	new bullet an objective of the strategy should be to increase accessibility and reduce private mobility, thus encouraging economic development and promoting modal shift	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Transport and Energy consultation	new bullet transport policy should be integrated with other sectors, such as social policy, employment and environment	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Transport and Energy consultation	new bullet the authorities should aim at introducing both hard policies of car restraint and soft policies aimed at changing user behaviour to achieve modal shift	Should be inserted
3.1.9 Promoting a Sustainable Transport System	Youth Consultation	The organisation of the Public Transport system is a measure that meets the needs of young people and that provides effective environmental education.	Should be inserted but widened to all people who use public transport.
3.2 Promoting Sustainable Economic Development	Malta Enterprise	New bullet: Create employment opportunities in sectors involving high value added activities whilst at the same time attending to the needs of the unemployed most of which are relatively unskilled;	Should be inserted

3.2 Promoting Sustainable Economic Development	Malta Enterprise	New Bullet Align Educational Institutions, training programmes with sectors targeted by Malta for further development	Should be inserted
3.2 Promoting Sustainable Economic Development	Malta Enterprise	Create synergies across sectors so as to build on core competences and resources with minimal impact on limited resources.	Should be inserted
3.2 Promoting Sustainable Economic Development	Malta Enterprise	Encourage economic diversification both at the sector level and at the company level to reduce the country's vulnerability on a specific sector and/or individual player.	Should be inserted
3.2.1 Malta's main economic challenges	Education Division	Par 3.'increased investment in human capital"  The country is spending a lot of time and using lots of resources on children at risk and this is important but it is not taking care of the high flyers who will be the leaders of tomorrow. These will be the ones to introduce innovation and entrepreneurship.	Should be inserted
3.2.1 Malta's main economic challenges	Education Division	Another aspect of competitiveness. We will never go for the cheap labour option but we can start selling excellence (e.g. i/c/w/ English). We have to act fast because other countries are already catching up and soon we are going to lose our headstart advantage.	Should be inserted
3.2.1 Malta's Main Economic Challenges	Focus Groups	The issue of availability of pensions should be given more prominence either in the social or economic sections of Chapter 3.	Should be inserted
3.2.1 Malta's Main Economic Challenges	Gozo consultation meeting	As regards economic growth it was suggested that this term should be clarified and more defined.	Should be inserted
3.2.1 Malta's Main Economic Challenges	Gozo consultation meeting	More focus should be made on the quality of life. The standard of living in general should be given more importance.	Should be inserted
3.2.1 Malta's Main Economic	Gozo consultation meeting	The level of the public sector should be improved.	Should be inserted

Challenges			
3.2.1 Malta's Main Economic Challenges	Gozo consultation meeting	Double insularity should be taken into consideration as regards Gozo's peripherality.	Should be inserted
3.2.1 Gozo	Gozo consultation meeting	Fiscal stability or monetary stability are not mentioned in the strategy. Include (in Bullet 4) budgetary balance and monetary policy.	Should be inserted
3.2.1 Malta's main Economic Challenges	MCST	Amend Bullet 2 as underlined: Increase investment in human capital, knowledge and innovation efforts, and in the scientific infrastructure in order to step up innovation, research and development <u>from an early age.</u>	Should be inserted
3.2.1 Malta's Main Economic Challenges	Occupational Health and Safety Authority	An enterprise which opens shop, and which does not give due importance to safeguarding workers' health and safety does not have a very bright future.  Although the document makes brief references to "health" and "safety", these are interspersed throughout the whole document, and are not presented as an overall objective to be met, or as an essential pre-requisite for sustainable development. <u>The level of occupational health and safety within any place of work can be used as a clear indicator of the sustainability of that place of work.</u> The same holds true for any particular sector or industrial activity.  It would appear that one has to strike a balance between encouraging or facilitating the opening of new opportunities while ensuring occupational health and safety. This is not unattainable. At the same time, one cannot mention the fact that an ever-increasing number of foreign companies require to be shown evidence of adequate health and safety before allocating any contracts- this is because they are well aware of the fact that a "good" company has more chance of meeting any agreed-upon deadlines and of guaranteeing the quality of the product if its health and safety standards are acceptable.	Should be inserted
3.2.1 Malta's Main Economic Challenges	United Nations Division for Sustainable Development	Bullet 1: Spell out how creating "employment opportunities to generate income and improve the quality of life of the population, in the context of sustainability" is going to be promoted:	Should be inserted
3.2.2 Promoting Sustainable	Gozo consultation meeting	Production is a long-term process. Therefore a long term perspective should be identified.	Should be inserted

Consumption and Production Patterns			
3.2.2 Promoting Sustainable Consumption and Production Patterns	Gozo consultation meeting	Amend Bullet 1as follows: “...economize on the use of non-renewables...” to be replaced with “should be gradual reduction”.	‘Economise’ implies reduction as well.
3.2.2 Promoting Sustainable Consumption and Production Patterns	Malta Enterprise	Increase the export of services to the levels achieved by Ireland;	Should be inserted
3.2.2 Promoting Sustainable Consumption and Production Patterns	Malta Enterprise	Increase the proportion of export of goods attributable to local companies;	Should be inserted
3.2.2 Promoting Sustainable Consumption and Production Patterns	National Council of Women	There are a lot of old cars that must be taken off the roads.	Should be inserted
3.2.2 Promoting Sustainable Consumption and Productive Patterns	UHM	The draft should address issues like the eco-contribution and the consumption and price of fuel.	Should be inserted
3.2.2 Promoting Sustainable Consumption and Production Patterns	Youth Consultation	One of the participants suggested that tenders should state that environmental and social issues will be taken into consideration.	Should be inserted
3.2.3 Reliance of Market Forces and Fair Trading	Consumer and Competition Division	In the economic development field, it is nowadays argued that competition law is generally the best way to allocate resources and the most efficient means of providing for technological and commercial innovation as well as consumer satisfaction. Though competition is beneficial for society as a whole, firms have incentives to acquire market power, in effect, to be in a position to influence	Should be inserted

		<p>prices and other factors determining business transactions. When firms exercise their market power this leads to inefficient results. The purpose of competition law is thus to control market power in order to promote economic efficiency.</p> <p>As to competition law in Malta, the Consumer and Competition Office aims to ensure that there is free and fair competition in the domestic markets by taking action against business practices which restrict competition, examining mergers to see if they reduce competition, and cooperating with other competition authorities, particularly within the European Competition Network (ECN) and the EuroMed Market Programme frameworks.</p>	
3.2.3 Reliance of Market forces and Fair Trading	Focus Groups	The following issues should be stressed: affordability and cost of living (relationship between wages and prices, particularly land and house prices), income distribution and a better work ethic.	Should be inserted
3.2.3 Reliance on Market Forces and Fair Trading	General Workers' Union	The values and principles of Sustainable Development should be spelled out in the policy of corporate social responsibility of the enterprise.	Should be inserted
3.2.3 Relevance of Market Forces and Fair Trading	Gozo consultation meeting	FDI is lacking in Malta and there is no strategy in this connection. More possibilities should be explored in order to identify Malta's competitive advantage.	Should be inserted
3.2.3 Reliance of Market Forces and Fair Trading	Malta Communications Authority	Pg 29 After para 2 insert the following: The role of regulatory authorities is important when such role is targeted to (1) ensure that certain goods and services are provided to all members of society irrespective of income and (2) ensure the efficient use of resources.	Should be inserted
3.2.3 Reliance of Market Forces and Fair Trading	Malta Communications Authority	Whilst recognizing the needs for a long-term approach to the planning and utilisation of critical environmental resources, emphasising the need for flexibility is deemed as very important... The reduction of bureaucracy and the possibility of having procedures, which are technologically neutral, will definitely help in this regard.	Should be inserted and widened in order not just to include environmental resources but also other resources.
3.2.3 Reliance on Market Forces and Fair Trading	Malta Enterprise	Encourage local competitors to collaborate and share costs to be able to compete on a global scale;	Should be inserted
3.2.3	Malta Enterprise	Direct assistance towards investment in Human Resource Training and Research and Development	Should be inserted

Reliance on Market Forces and Fair Trading		Activities. This investment has been lacking due to market failure.	
3.2.3 Reliance of Market force and Fair Trading	Ministry of Health, the Elderly and Community Care	The reliance on market forces for the supply of pharmaceuticals may lead to uncontrolled prices for pharmaceuticals on the private market. The proposal for the setting of a pricing policy for pharmaceuticals in Malta, which was drafted, was not implemented. The introduction of a system for registration of medicines has lead to increased impact of market forces on the availability of medicines in Malta. The public health perspective should prevail to ensure the availability of essential medicines in Malta.	Should be inserted
3.2.3 Reliance of Market Forces and Fair Trading	UHM	One of the main problems in today's society is the incompatibility between economic activities. To quote one example, fish farming, which has become a lucrative business to some entrepreneurs, is causing harm to the environment and tourism.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	A national priority for Science and Technology in support of Sustainable Development: cleaner, sustainable and more efficient technologies (such as renewable energy technologies, energy efficiency of electrical and electronic equipment);	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	A national priority for Science and Technology in support of Sustainable Development:enable the optimized use of natural resources ( such as through recycling applications).	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Gozo consultation meeting	More importance should also be given to research and development.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Malta Enterprise	Design a legal and economic framework for the development of Venture Capital and Public Private Partnerships in Malta;	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Malta Enterprise	Maximise use of EU funding provided for research and development	Should be inserted

3.2.4 Promoting Innovation, Science and Technology	Manufacturing Industry Consultation	The EU Innovation Scoreboard (2002) results clearly indicate a low assessment for the overall innovation performance for Malta e.g. the number of Maltese <i>patent</i> applications is negligible compared to the mean of the current 15 EU members. Increased prosperity needs to be obtained in Malta by the manufacture of higher value added products. This is because innovative products have a high value added as they can command higher prices due to their scarcity. According to the FOI, a significant number of Malta-based larger SMEs rely on their parent foreign companies for their design and product innovation. FOI argues that innovation and research are an essential component in order to improve Malta's competitiveness. In this scenario, Maltese enterprises thus need technical and financial support to 'innovate' in the way products are produced and also in the way products function.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Manufacturing Industry Consultation	Promote and fund research to help industry develop innovative products and processes.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Manufacturing Industry Consultation	Insert after the first paragraph on page 30...  It is relevant to note that Malta's innovation potential is currently weak when compared with the other EU 15 member states.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Manufacturing Industry Consultation	New bullet: Setup and sustain a National Research Programme as in other EU member states	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Manufacturing Industry Consultation	New bullet: Phase-in an increase in Malta's gross expenditure on R&D (GERD) up to 2006 and beyond, bringing Malta's R&D spending closer to the enlarged EU average.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Manufacturing Industry Consultation	New bullet: As with other many EU member states set up a 'Malta Innovation Council' to provide industrial stakeholders with technological and/or organizational innovation support when they need it. As with for instance the UK Design Council, this entity would explicitly help Maltese industry exploit design to help <u>create</u> innovative products people want to buy, as well as make manufacturing processes more efficient and hence competitive;	Should be inserted
3.2.4 Promoting Innovation,	MCST	New Bullet: Strengthen the local Science and Technology base and related capacity through the development of a	Should be inserted . The last proposal

Science and Technology		specific government funding line focused on environmental Science and Technology and applied Research and Development within the National Research Programme currently run by MCST (co-financed through Structural Funds). The research needs also to focus on indicators, monitoring and evaluation of progress in achieving sustainability targets.	mentioned will be the responsibility of the permanent secretariat.
3.2.4 Promoting Innovation, Science and Technology	MCST	A national priority for Science and Technology in support of Sustainable Development: making available tools for achieving Sustainable Development (such as observation networks, knowledge networks, decision support systems).	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	Exploit Science and Technology as an enabling factor of Sustainable Development in order to ensure sustained livelihoods and sustainable economic growth. Examples of this: <ul style="list-style-type: none"> <li>○ agriculture and fisheries (targeting greater productivities);</li> <li>○ industry (such as to lower greenhouse gas emissions, making operations more effective);</li> <li>○ housing (mainly in improving practices for household energy efficiency);</li> <li>○ infrastructure (providing alternative energy technology solutions);</li> <li>○ communications (by promoting knowledge networks and especially through the use of our IT resource in activities targeting the addition of value to knowledge in the preparation of innovative applications and supply of more efficient services).</li> </ul>	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	There is a lack of graduates in Science and Technology. Moreover, there is also the need for more women graduates in this area.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	Innovation and creativity are both important for sustainable development and social aspects.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	New Bullet: Raise public awareness of science	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MEPA	Ongoing scientific research is also an important foundation for Strategy for example in order to enhance the information available with respect to environmental issues (biodiversity, air quality, wastes, etc.).	Should be inserted
3.2.4	Ministry of Health,	The local manufacturing of pharmaceuticals is of generic products and to date there is no indication of	Should be inserted

Promoting Innovation, Science and Technology	the Elderly and Community Care	other types of pharmaceutical manufacturing occurring in Malta such as Research and Development of new chemical entities and biotechnology products. Malta should exploit its ‘advantage’ in terms of lack of patent protection for most medicinal entities, which favors the manufacture of generic products for the next 10 to possibly 15 years.	
3.2.4 Promoting Innovation, Science and Technology	Ministry of Health, the Elderly and Community Care	The strategy in this document lacks reference to how research could be financed, developed and sustained and falls short to mention any tangible outcomes to meet the real needs of the scientific community.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	Ministry of Health, the Elderly and Community Care	The lack of availability of skilled workers in the pharmaceutical sector may deter the possibility for development in this area. There us a lack of research and development in this area in Malta (refer to 3.2). Seeing that Europe is losing its competitiveness in this area it is unlikely that there will be developments in Malta in the near future.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	A national priority for Science and Technology in support of Sustainable Development: conservation and sustainable use of genetic resources for food and agriculture.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	A national priority for Science and Technology in support of Sustainable Development: improve agricultural production in a sustainable manner, providing technological solutions to improve yields without increases costs on the environment.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	A national priority for Science and Technology in support of Sustainable Development: promote sustainable agricultural technologies and practices, including the safe use of biotechnologies.	Should be inserted
3.2.4 Promoting Innovation, Science and Technology	MCST	<p>There is not enough emphasis in the Draft Strategy on the most essential requirement for making the strategy work <u>as far as Science and Technology is concerned</u>, namely, the all-important matter of retaining on our soil the top-notch human resources that we have now, and those that will become available to us in the near future. There is only one possible motivation, which can dissuade brilliant brains from leaving our shores, (the much feared brain-drain).</p> <p>Incentives could include:</p> <ul style="list-style-type: none"> <li>- Remuneration that is comparable to that obtaining in other EU centres of excellence.</li> <li>- High-quality work-place infrastructures.</li> <li>- <u>Minimal</u> bureaucratic interference.</li> <li>- Satisfying inducements for aiming at superior standards.</li> </ul>	Should be inserted

<p>3.2.4 Promoting Innovation, Science and Technology</p>	<p>MCST (may repeat detailed recommendations submitted for other sections)</p>	<p><b>1. Integrating Science and Technology into the Sustainable Development Strategy</b></p> <p>Chapter 3 ‘Developing the Strategy’ does not articulate/incorporate adequately the element of Science and Technology within the Sustainable Development Strategy. Chapter 3 divides the strategy into separate themes that implicitly invoke a sectorial approach; whilst on the other hand the framework of the Sustainable Development strategy should reflect a more coherent and holistic approach. There needs to be a better integration economic, social and environmental issues and the development of more cross-sectoral approaches to the Strategy. The Strategy needs to focus not only on the environment but also on man’s place in the environment. Chapter 3 does not mention the opportunities opened up by science and technology in providing solutions to environmental concerns, for example tools that can be applied in the construction industry in the cutting of stone. It is recommended that local science and technology expertise and research be utilized to the full and that applied research and development by local researchers is better supported to produce specific solutions tailored to Malta’s particular environment. In this regard, one recommendation that could be considered is the development of a specific government funding line focused on environmental Science and Technology and applied R&amp;D within the National Research Programme currently run by MCST. The research needs also to focus on indicators, monitoring and evaluation of progress in achieving sustainability targets. It is important that the local Science and Technology base and capacity is strengthened. Thus this chapter needs to explicitly point out the critical role of Science and Technology at the service of Sustainable Development, both in terms of supplying tools and solutions, as well as generating new applications that can in parallel lead to improved quality life and economic advantage.</p> <p>Ch4 ‘Implementing the Strategy’ needs to explicitly address Science and Technology as an enabling factor of Sustainable Development. Sustainable Development is not simply concerned with the conservation of environmental health and the safeguarding of resources, the prime focus of this chapter, but should also include an emphasis on sustained livelihoods and sustainable economic growth. The way that Science and Technology can specifically support this should also be a prime concern of the Sustainable Development Strategy.</p> <p><u>Why focus on Science and Technology in an Sustainable Development Strategy?</u></p> <p>In the design and implementation of an Sustainable Development Strategy, funding for scientific research and technological development is as crucial as investing in public health, education and well-being. Through Science and Technology one is able to transform data and information into useful knowledge, and to subsequently enable effective, useful and cost-effective actions and solution. The</p>	<p>Should be inserted</p>
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		<p>main targets of Science and Technology in Sustainable Development are:</p> <ul style="list-style-type: none"> <li>- to ensure better use of scarce resources (natural and human) through integrated resource management and to conserve them for future generations</li> <li>- to exploit emerging economic opportunities opened up through Science and Technology</li> <li>- to develop Sustainable Development skills and related job opportunities.</li> </ul> <p>The emphasis should be on deploying Science and Technology to enable economy-wide and society-wide Sustainable Development:</p> <ul style="list-style-type: none"> <li>- to help resolve pressing problems</li> <li>- to help fulfill Sustainable Development commitments through the deployment of innovative initiatives using as much as possible indigenous capacities rather than resorting to readymade imported solutions.</li> </ul> <p>Developing the national Science and Technology base is a necessary pre-requisite for achieving these goals.</p> <p><u>An indicative list of national priorities for Science and Technology in support of Sustainable Development (not a comprehensive list)</u></p> <ul style="list-style-type: none"> <li>- cleaner, sustainable and more efficient technologies (such as renewable energy technologies, energy efficiency of electrical and electronic equipment);</li> <li>- making available tools for achieving Sustainable Development (such as observation networks, knowledge networks, decision support systems);</li> <li>- enable the optimized use of natural resources ( such as through recycling applications);</li> <li>- conservation and sustainable use of genetic resources for food and agriculture;</li> <li>- improve agricultural production in a sustainable manner, providing technological solutions to improve yields without increases costs on the environment;</li> <li>- promote sustainable agricultural technologies and practices, including the safe use of biotechnologies.</li> </ul> <p><u>How can the contribution of Science and Technology to Sustainable Development be more effective?</u></p> <p><b>The key thrust should be to seek to match existing indigenous capacity and knowledge with modern Science and Technology to bring about improvements in:</b></p> <ul style="list-style-type: none"> <li>- agriculture and fisheries (targeting greater productivities);</li> <li>- industry (such as to lower greenhouse gas emissions, making operations more effective);</li> </ul>	
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		<ul style="list-style-type: none"> <li>- housing (mainly in improving practices for household energy efficiency);</li> <li>- infrastructure (providing alternative energy technology solutions);</li> <li>- communications (by promoting knowledge networks and especially through the use of our IT resource in activities targeting the addition of value to knowledge in the preparation of innovative applications and supply of more efficient services).</li> </ul> <p>This requires:</p> <ul style="list-style-type: none"> <li>- training of human resources and upgrading of skills (see human resources section below);</li> <li>- an effective local community participation to avoid the domination of the development process by outside technology and know-how;</li> <li>- greater involvement of SMEs.</li> </ul> <p><b><u>Main recommendations for enhancing the national Science and Technology base in support of Sustainable Development:</u></b></p> <ul style="list-style-type: none"> <li>- to promote more problem-oriented research and development;</li> <li>- to target Science and Technology capacity building</li> <li>- to link R&amp;D to actions and support applications for Sustainable Development</li> </ul>	
3.2.5 Sustainable Agriculture and Fishing	MEPA	New bullet Provide the necessary education and training in agriculture	Should be inserted
3.2.5 Sustainable Agriculture and Fishing	Gozo consultation meeting	Farmers and fishermen should be given more motivation especially the farmers. These should be provided with some form of training and should be encouraged to use modern machinery. Where necessary, some form of aid or subsidy should be given.	Should be inserted
3.2.5 Sustainable Agriculture and Fishing	Gozo consultation meeting	The protection of soil from erosion processes should be tackled without delay.	Should be inserted
3.2.5 Sustainable Agriculture and Fishing	MEPA	Para 1. “Maltese agriculture is characterised by ... low quality products”. This is an unfounded statement and should be removed. Such a statement reflects lack of appreciation for Maltese produce. It is not considered appropriate to include such comments in this document.	Should be inserted
3.2.5	Nature Trust	Set up a monitoring system to assess extent of pesticide drift in valleys, protected sites and areas of	Should be inserted

Sustainable Agriculture and Fishing		intensive agriculture – this is necessary both in terms of assessing health risks as well as establishing the basis for encouraging organic farming	
3.2.5 Sustainable Agriculture and Fishing	Nature Trust	The Strategy does not seem to tackle the issue of high impact unsustainable activities such as tuna farming. The practice is unsustainable both in terms of the coastal degradation which is caused in general by aquaculture operations but also especially due to the crisis in bluefin tuna stocks – a species which is threatened by commercial extinction. This will have negative effects on the species but also on the livelihood of fishermen. A clear policy should be introduced which prohibits the setting up of new tuna farms or extensions to present ones.	Already partly Should be inserted in 3.1.7 stating that “the effects of fish-farming and tuna-penning need to be further studied so that the evidence gathered can serve as a guide for possible future granting of permits.
3.2.5 Sustainable Agriculture and Fishing	Nature Trust	Organic farming and agri-tourism need to be given support and incorporated within the text.	Should be inserted
3.2.5 Sustainable Agriculture and Fishing	Farmers’ consultation	REVISE THE WHOLE SECTION AS FOLLOWS:  <b><u>SUSTAINABLE AGRICULTURE AND FISHING</u></b>  Maltese agriculture is characterised by small fragmented holdings and irregular rainfall. A recent development is that the opening of the domestic market to increased international competition is likely to render certain types of agricultural products less profitable. A high population density with associated land scarcity has also led to a high opportunity cost of farmland. These negative factors, compounded by climate change, could give rise to abandonment of agricultural land, which would then lead to increased soil erosion, with consequent land degradation and undesirable changes in the landscape. Safeguarding agriculture is therefore crucial.  The farming community has always constituted an important component of Malta’s social structure, contributing to the maintenance and enhancement of Malta’s rural environment and landscape and, indirectly, to Malta’s tourism industry. Furthermore, in view of Malta’s island status in the periphery	Should be inserted

		<p>of the production centres of Europe, Maltese agriculture provides a vital source of fresh food security despite precarious water supply. The provision of a holistic national water conservation programme is essential so as to assure long-term sustainability of the sector.</p> <p>In recent decades, the agricultural sector experienced continuous decline in its share of GDP as well as employment generation, mainly due to an increase in the manufacturing and tourism sectors. Given inherent constraints associated with small holding size and fragmentation, complete reliance on the market mechanism is not likely to stall or reverse the trend. Towards this end, the Maltese Government has Should be inserted a Rural Development Programme plus a Special Market Policy Programme for Maltese Agriculture to specifically support the rural sector. Through such measures, farmers, as providers of environmental public goods, may apply for financial assistance.</p> <p>On the other hand, conditional to assistance is the observation of a number of environmentally orientated EU directives particularly the Code of Good Agricultural Practices, the Nitrates Directive and the Water Framework Directive. Other than conforming to environmentally beneficial approaches, conservation of Malta's rurality not only provides fresh food to the local population, but also provides an aesthetically pleasing landscape that is, for all intents and purposes, the remaining green lung of the country, which also complements tourism.</p> <p>Without farmers' intervention, the provision of public goods – in particular the range of environmental and cultural goods such as biodiversity, the preservation of the rural heritage and areas of high landscape value - and the externalities arising from farming activities will not be realized. Such intervention also has the added benefit of checking a number of undesirable effects associated with farm land abandonment particularly soil erosion and dilapidated rubble walls. The abandonment of cultivated areas may also lead to further intrusion by building development in an ever decreasing agricultural area that has diminished to about one-third of total land area. Agriculture and its associated benefits command its continued existence.</p> <p>Fishing in Malta is seasonal, as the main commercial species are migratory. Although Malta is surrounded by sea, fishing generates limited income and employment, a situation exacerbated by the dwindling catches in the central Mediterranean. As a result, the share of GDP contributed by this sector has remained small. The fishing vessels tend to be small and multipurpose. In recent years there was a rapid development in aquaculture fish production, most of which is exported.</p> <p>Malta has recently negotiated an arrangement with the EU that will allow management of a 25-mile fisheries zone around the coast for conservation purposes. The aim is to promote sustainable fishing</p>	
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		<p>within that zone. Only vessels smaller than 12 metres will be allowed to fish in the zone so that only small scale coastal fishing which is least harmful to the natural environment will be allowed. In addition, the number of fishing permits will be limited and will not exceed current numbers.</p> <p>The arguments in favour of government intervention applicable to agriculture also apply to fishing, since this sector also provides public goods which contribute to the culture of the islands and could serve as tourist attractions.</p> <p><b>Main strategic directions with regard to the agricultural and fisheries sectors:</b></p> <ul style="list-style-type: none"> <li>• Encourage farmers and fishermen to, as much as possible, achieve financial viability of their enterprises, through improved competitiveness, using environmentally sustainable methods.</li> <li>• Remunerate farmers and fishermen, through correlated EU measures, to compensate for their multifunctional roles, particularly the supply of environmental public goods.</li> <li>• Help farmers and fishermen upgrade and modernise their technology and equipment in an environment where resource sustainability, particularly the provision of water, is assured.</li> </ul>	
3.2.6 Sustainable Construction and Quarrying	Gozo consultation meeting	There should be a better strategy and monitoring for vehicles used at the quarrying industries.	Should be inserted
3.2.6 Sustainable Construction and Quarrying	Gozo consultation meeting	Dust pollution issue, including that generated during construction works has to be better addressed.	Should be inserted
3.2.6 Sustainable Construction and Quarrying	Individual	New bullet: Regulate the quarrying industry to adopt more environmental friendly measures in particular the reduction of dust pollution.	Should be inserted

3.2.6 Sustainable Construction and Quarrying	National Council of Women	Law on construction waste must be enforced.	Should be inserted
3.2.6 Sustainable construction and quarrying	Construction Consultation	The section on construction is too negative and too much built on enforcement. Better suggest incentives (the carrot and stick concept).	Should be inserted . Changed the title to 'sustainable construction and quarrying' from 'curbing the damage of construction and quarrying'.
3.2.6 Curbing the Damage of construction and Quarrying	Gozo consultation meeting	People working in the construction industry need to be educated and should have training and retraining exercises.	Should be inserted
3.2.6 Curbing the Damage of Construction and Quarrying	Gozo consultation meeting	Common restoration environmental plans should be a priority, for example as regards quarries.	Should be inserted
3.2.6 Curbing the Damage of Construction and Quarrying	MEPA	NewBullet: Internalise the environmental and other externalities of quarrying	Should be inserted
3.2.6 Curbing the Damage of Construction and Quarrying	Nature Trust	All quarries must have a restoration plan for the site they have used for extraction.	Should be inserted
3.2.6 Curbing the Damage of Construction and Quarrying	Nature Trust	The impact of blasting and the impact of powerful tremors should be assessed as a lot of damage is being done to buildings, cliff faces, sensitive sites etc.	Should be inserted . 'Monitored' has been used instead of 'assessed'.
3.2.6 Curbing the Damage of Construction and Quarrying	Nature Trust	Encourage research and initiatives which seek to re-use lower quality stone or stone which has become part of the waste stream.	Should be inserted
3.2.6 Durbing the Damage of	Nature Trust	Monitor dust pollution from quarries	Should be inserted

Construction and Quarrying			
3.2.6 Curbing the Damage of Construction and Quarrying	Nature Trust	Many quarries, especially in Gozo do not have the necessary permits and most operate illegally or apply for sanctioning AFTER the damage is done. In such cases works should be stopped or operations slowed down until all abuses stop.	Should be inserted
3.2.7 Sustainable Manufacturing	Gozo consultation meeting	The manufacturing industry should be enforced to educate and train people who are interested in joining the industry. Training and retraining exercises should be organised.	Should be inserted
3.2.7 Sustainable Manufacturing	Malta Enterprise	Develop a technical competitiveness council comprised of members of the public sector (ME, MTA and MFSA) and the Private Sector reporting directly to the MCESD.	Should be inserted
3.2.7 Sustainable Manufacturing	Malta Enterprise	Devise measures aimed at developing clustering potential between local enterprise and foreign direct investors across the value chain.	Should be inserted
3.2.7 Sustainable Manufacturing	Malta Enterprise	Devise measures aimed at developing synergies between clusters to increase the competitiveness of the island particularly by improving factor condition and access to appropriate markets.	Should be inserted
3.2.7 Sustainable Manufacturing	Malta Enterprise	Devise measures aimed at reducing dependence on single industry players.	Should be inserted
3.2.7 Sustainable Manufacturing	Malta Enterprise	Focus efforts on key sectors which maximise the use of Malta's core competences and which have an attractive market over the long term.	Should be inserted
3.2.7 Sustainable Manufacturing	Manufacturing Industry Consultation	New bullet: Incentives and advice should be provided by Government agencies to help the manufacturing industry conserve energy, recycle water and to also actively engage in R&D so as to become more innovative in both the products manufactured and also the manufacturing processes utilized.	Should be inserted

3.2.7 Sustainable Manufacturing	Manufacturing Industry Consultation	Manufacturing contributes to about 23% of GDP and hence for this reason, it needs to be treated with great care. Given that since the generation of the draft document, Malta has now formally embarked on becoming a full EU member on 1 <sup>st</sup> May 2004, this new status needs to be reflected in the section.	Should be inserted
3.2.7 Sustainable Manufacturing	Manufacturing Industry Consultation	Some bullets are too vague eg: “take (which?) measures to enhance competitiveness in the manufacturing sector, and develop a competitiveness strategy in this regard”. As it is, this bullet is proposing the development of another strategy (ie a competitiveness strategy) rather than recommend key actions that enhance manufacturing industry’s competitiveness. It is therefore essential that at least key actions be explicitly disclosed in the Strategy.	No amendment since there is no indication from the public consultation of what key actions should be included.
3.2.7 Sustainable Manufacturing	Manufacturing Industry Consultation	Given that the Maltese manufacturing industry needs to manufacture products that are either designed locally or abroad, then clearly concrete actions that enhance Malta’s manufacturing industry need to be based on a holistic view at <i>product development</i> activities, technologies and methodologies.	Should be inserted
3.2.7 Sustainable Manufacturing	Manufacturing Industry Consultation	New Bullet: In correlation with the 6 <sup>th</sup> EU Environment Action Programme 2001-2010, introduce an Integrated Product Policy approach to promote the greening of products and processes through for instance the promotion of intelligent product design that reduces the environmental impacts of products from their conception to the end of their useful life;	Should be inserted
3.2.7 Sustainable Manufacturing	Manufacturing Industry Consultation	New Bullet: Promote the use of relevant ICT as an enabling technology to improve manufacturing businesses <sup>2</sup> e.g. process planning, decision support systems, collaborative design;	Should be inserted
3.2.7 Sustainable Manufacturing	MEPA	Mention should be made of the promotion of voluntary measures such as ISO 14001, EMAS or eco-labelling. These are very important tools which can be used for industry and also local authorities, as these have the added benefit of not only improving the environmental performance of the organisation, but also result in cost savings.	Should be inserted
3.2.8 Promoting Sustainable	Heritage Malta	It may be correct to add that tourism not only impacts the physical environment but also non-renewable resources such as cultural heritage.	Should be inserted

<sup>2</sup> *ManuFuture 2003* European Manufacturing of the Future: Role of Research & Education for European Leadership. A conference organized by the European Commission on 1-2 December 2003, Milan, Italy.

Tourism			
3.2.8 Promoting Sustainable Tourism	Malta Enterprise	Promote and Encourage increases in Tourism Levels in the Shoulder Months.	Should be inserted
3.2.8 Promoting Sustainable Tourism	Nature Trust	<p>Add Bullet: Assess the possibility of marketing ecotourism and agri tourism and similar forms of low impact sustainable forms of tourism.</p> <p>(The World Tourism Organisation defines sustainable tourism development as a form of tourism development that meets the 'needs of present tourists and host regions while protecting and enhancing opportunity for the future. It is envisaged as leading to management of all resources in such a way that economic, social and aesthetic needs can be fulfilled while maintaining cultural integrity, essential ecological processes, biological diversity and life support systems. Sustainable tourism operates in harmony with the local environment, community and culture, so that these become the permanent beneficiaries and not victims of tourism development.')</p>	Should be inserted
3.2.8 Promoting Sustainable Tourism	Tourism Consultation	Insularity is a reality and limits the carrying capacity of small islands. Carrying Capacity should take seasonality into account. There is therefore the need to cap tourist inflows but at the same time attract higher quality tourism.	Should be inserted
3.2.8 Promoting Sustainable Tourism	Tourism Consultation	Winter tourism should be encouraged to spread tourism inflow. However one has to balance the objective of sustainability with practicality	Should be inserted
3.2.8 Promoting Sustainable Tourism	Tourism Consultation	Local Councils are not consulted enough and often localities are burdened with providing tourism facilities without being adequately compensated. There is the need to fund local councils in tourism zones to compensate for tourism presence i.e. more cleaning etc.	Should be inserted
3.2.8 Promoting Sustainable Tourism	Tourism Consultation	The tourism operators should give more importance to product development rather than to making quick profits. This relates to the tradeoff between free market vs. sustainability.	Should be inserted
3.2.8 Promoting Sustainable Tourism	Tourism Consultation	Importance should be assigned to domestic tourism, which also generates income and employment.	Should be inserted
3.2.8 Promoting Sustainable Tourism	Tourism Consultation	Tourism has various social negative impacts, and the local communities should be consulted when tourism developments take place.	This already takes place through the development planning process.

			So no need to amend.
3.2.8 Promoting Sustainable Tourism	Tourism Consultation	Tourism operators should be incentivised to take a green approach and to be more aware of the negative impacts on the environment.	Should be inserted
3.2.8 Promoting Sustainable Tourism	Tourism Consultation	The Malta Tourism Authorities should take advantage of events e.g. the Olympic games in Greece were not exploited here to attract sports tourism.	Not Should be inserted since the comment was not clear.
3.2.8. Promoting Sustainable Tourism	Moviment Graffiti	Tourist development that eats up large tracts of land (f.eg golf courses, mega-projects, etc..) should be avoided.	Should be inserted
3.2.9 Linking Infrastructural Needs to Sustainable Development	Nature Trust	Add Bullet: Infrastructural works should not be above the law – the necessary studies should be undertaken before embarking on heavy impact infrastructural projects and no permits should be granted before adequate mitigation measures are agreed upon and works should be supervised to guide contractors and workers especially in sensitive areas.	Should be inserted
3.2.9 Linking Infrastructural Needs to Sustainable Development	Gozo consultation meeting	As regards Bullet 2, the integration of different services is important. To include the word ‘linkages’	The concept of integration is already clear. So no need to amend.
3.2.9 Linking Infrastructural Needs to Sustainable Development	Gozo consultation meeting	A more efficient redistribution system of electricity generation is necessary.	Should be inserted
3.2.9 Linking Infrastructural Needs to Sustainable Development	MEPA	P2 It might be useful to define what is meant by “ <i>environmental footprint</i> ”.	
3.3.1 The social dimension of Sustainable Development	National Council of Women	The task of promoting equality between men and women is not an easy one. It requires a change in mentality and practical and innovative approaches to bring about real equality. All sectors of society have a role to play to improve the quality of life in three key areas, namely (a) economic growth and equity, (b) social development and (c) conserving natural resources and the environment. Their balance cannot be achieved without solving the prevailing problems of gender inequality and inequity	Should be inserted

		Malta together with other European countries is adopting a number of measures, in line with the EU Sustainable Development Strategy, including gender mainstreaming in social protection and social inclusion, gender equality in employment to promote stable and quality employment for all women and men who are capable of working. Policies are being developed to promote reconciliation of work and family life including the provision of child-and dependent- care.	
3.3.1 The social dimension of Sustainable Development	National Council of Women	There are major gaps and emerging issues that need to be addressed. These include the need to integrate gender concerns and to mainstream gender issues into development policies.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Kummissjoni Nazzjonali Anzjani	Ix-xjuhija qed iggib bidliet fis-socjeta. Kemm il-kultura kif ukoll il-qafas tal-policies taghna jridu jilqghu ghal din l-isfida l-gdida. Statistikament nafu li n-numru ta' anzjani ha jizjed b'ritmu mgħagħel fis-snin li gejjin. Dan huwa rizors gdid u minhabba l-kompetitivita hemm htiega li l-anzjani jdumu aktar jahdmu sa kemm ikunu b'sahhithom. Is-suq tax-xogħol irid johloq spazzju, jinvesti u jisfrutta l-hiliet tal-haddiema ta' 'l fuq minn 50 sena, ta' voluntiera u ta nies ta' negozju.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Kummissjoni Nazzjonali Anzjani	Irridu nharsu lejn l-anzjani bhala konsumaturi u ghaldaqstant nifthu toroq godda li jattiraw il-gosti u l-htigijiet tagħhom biex b'hekk inkabbru l-attivitá ekonomika.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Kummissjoni Nazzjonali Anzjani	Irridu niehdu hsieb is-sahha u l-kura ta' l-anzjani.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Kummissjoni Nazzjonali Anzjani	Ma nittraskurawx l-income security tal-pensjonanti. Nassiguraw li jkollna sistema ta' pensjoni adegwata u sostenibbli. Importanti li l-pensjonanti ma jkunux eskluzi mis-socjeta jew f'riskju ta' faqar.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Kummissjoni Nazzjonali Anzjani	Ma ninsew qatt il-kontribut li jghatu l-anzjani lis-socjeta, fil-volontarjat, fl-ekonomija, fil-familja, bl-esperjenza etc. L-anzjan huwa izors u mhux piz.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	National Council of Women	Flexible working methods are essential to help woman and man balance their work and family life.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	United Nations Division for Sustainable	Most of the main strategic directions are well mapped out. A few, however, could use better specificity. For example, 3.3.1 calls for promoting "intragenerational and intergenerational equity." These are such huge and complex goals, I suggest that it is important to spell out more clearly how	Since this is a strategic goal, there is no need to

	Development	they would be promoted.	specify in the strategy the implementation tools to foster awareness on intragenerational and intergenerational equity.
3.3.1 The Social Dimension of Sustainable Development	Youth Consultation	New Bullet: Appoint a Guardian of Future Generations as part of the strategy for sustainable development. The appointee should represent the interests of future generations on the NCSD and, if and where necessary, on other state bodies/agencies.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Department of Industrial and Employment Relations	The Department is responsible for monitoring the implementation of the principle of equal treatment in relation to employment as provided in the Equal Treatment in Employment Regulations, LN 461 of 2004, issued in terms of the Employment and Industrial Relations Act. This Legal Notice transposes the relevant provision of EU Directives 2000/78/EC and 2000/43/EC.	No need to amend.
3.3.1 The Social Dimension of Sustainable Development	Focus Groups	Gender issues, which are also a priority in Malta's National Action Plan for Social Inclusion, should be given more holistic attention in the Strategy.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Focus Groups	Respondents were also very concerned with the issue of prices, including house prices, and their relationship to wages. This again could be given more importance by the authors of the social or economic sections of Chapter 3.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Focus Groups	Issues related to immigration are on people's minds. There are also concerns relating to intolerance and racism.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Focus Groups	The following factors contribute positively to quality of life and therefore merit protection through the Strategy: safety from crime, fair distribution of wealth, traditions and culture, and close families.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Foundation for Social Welfare Services	Although the social dimension is contemplated under the section 'Promoting Social Cohesion in Malta', which delineates various social targets, the issue of asylum seekers seems to be omitted. We believe that the Sustainable Development Strategy should be consistent with the Government's other	Should be inserted

		strategy on Social Cohesion, which gives relevance to the issue of asylum seekers, more so since this is also an important target set by the EU for the promotion of social cohesion. Therefore, we recommend that this issue be added to the targets contemplated in your Strategy.	
3.3.1 The Social Dimension of Sustainable Development	Foundation for Social Welfare Services	The influx of refugees to our shores, is a relatively recent phenomenon for the Country and therefore much still has to be done to ensure sustainable development in this regard. However, Government, in its endeavour to eliminate discrimination, acknowledges that all persons coming to Malta, be it legally or illegally, have rights that should be respected. In this context, we are obliged to provide these human beings with basic essential services and necessary information to help them understand the Maltese culture and be able to integrate themselves, although temporarily, in Maltese society. This entails providing them also with appropriate training and support to help them obtain necessary skills to seek employment and become self-sufficient, thus eliminating the risk of social exclusion. Social inclusion is one of the targets of the EU, and through the development of asylum seekers, the Country would be fulfilling this obligation, while benefiting of varied competences these individuals hold and cross fertilization of cultures.	Should be inserted
3.3.1 The Social Dimension of Sustainable Development	Individual	<p><b>The Role of Women in Sustainable Development</b>  <i>'Human Development if not engendered is endangered'</i> (UN Human Development Report 1995.)</p> <p>Raising the value of gender equality is a key priority. The task of promoting equality between men and women is not an easy one. It requires a change in mentality and practical and innovative approaches to bring about real equality. Our country is all the richer if women contribute together with men in making full use of their potential in the economic, social, cultural and environmental spheres.</p> <p>The Act to promote Equality for Men and Women has provided the legal framework to eliminate discrimination on the basis of sex in a number of areas including employment, education and vocational guidance, discriminatory advertising for employment and sexual harassment at the workplace among others. The role of the Commission for Equality for Men and Women is to work towards the elimination of discrimination between men and women and to take measures to promote equality in all areas.</p> <p>The European Union Strategy for Sustainable Development, in line with the UN strategy was incorporated in the Lisbon Strategy (2000). Malta together with other European countries is adopting a number of strategies including gender mainstreaming in social protection and social inclusion, gender equality in employment to promote stable and quality employment for all women and men who are capable of working. Policies are being developed to promote reconciliation of work and family life including the provision of child-and dependent- care.</p> <p>All sectors of society have a role to play to improve the quality of life in three key areas: economic</p>	Should be inserted

		<p>growth and equity, social development and conserving natural resources and the environment. Their balance cannot be achieved without solving the prevailing problems of gender inequality and inequity. The role of women in addressing these needs and at the same time ensuring sustainable development has been a key element for the last two decades. After the Earth Summit in Rio in 1992, <b>Agenda 21</b>, Chapter 24 '<b>Global Action for Women Towards Sustainable and Equitable Development</b>' outlined strategies to achieve the full and equal participation of women in order to bring about sustainable development. Its aim is to strengthen the role of women in sustainable development, particularly focusing on the elimination of obstacles to women's equal participation in decision making activities.</p> <p>The following are some of the objectives which provide an important framework for achieving gender equality:</p> <ul style="list-style-type: none"> <li>- Women's human rights and control over their lives.</li> <li>- Poverty eradication</li> <li>- Preventing the risk of exclusion</li> <li>- Protection of the most vulnerable such as those who have a disability</li> <li>- Women's access to resources, goods and services</li> <li>- Women's control and management of resources</li> <li>- Finance for development</li> <li>- Health, including environmental health in relation to biotechnology and chemicals</li> </ul> <p>However there are also gaps and emerging issues that have to be addressed such as:</p> <ul style="list-style-type: none"> <li>- Integrating gender and environment concerns into development.</li> <li>- Gender-mainstreaming of environmental policies and programmes. including addressing gender specific impact of environmental degradation and conservation</li> <li>- Women's participation in decision and policy making.</li> </ul> <p>Specific areas such as energy use also need to be addressed:</p> <ul style="list-style-type: none"> <li>- Non governmental organisations should ensure integrated and holistic energy policies which take into account women's needs</li> <li>- Educate themselves and their members on sustainable energy uses and concerns relevant to women's needs</li> <li>- Participate as stakeholders in energy policy and planning resources</li> <li>- Gain technical education to increase access to women friendly energy technologies</li> </ul>	
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3.3.1 The social dimension of sustainable development	National Council of Women	Young couples are finding it very difficult to find new homes. Many elderly are prisoners in their homes due to steps. Plan for moving elderly to ground floor must be implemented.	Should be inserted
3.3.2 Promoting Social Cohesion	Kummissjoni Nazzjonali Anzjani	<p>Hemm bzonn bidla fl-attitudni tan-nies biex ikollna socjeta mibnija fuq kull eta, li tippromovi solidarjeta bejn il-generazzjonijiet biex fl-ahhar twassal ghal rikonoxximent li l-anzjani qed jaghtu kontribut xieraq lis-socjeta.</p> <p>Hemm diversi toroq fejn l-anzjani jistghu jghinu fl-istrategija ghall-izvilupp socjali li jkun sostenibbli fl-Ewropa. Tajjeb li nsemmu il-prioritajiet li jikkoncernaw lil din il-faxxa ta’ nies. Dawn huma:</p>	Should be inserted

		<ul style="list-style-type: none"> <li>• Is-Sahha</li> <li>• Il-Faqar u l-Eskluzjoni Socjali</li> <li>• Socjeta li qed tixjiegħ</li> <li>• Il-Mobilita u t-Trasport.</li> </ul>	
3.3.2 Promoting Social Cohesion	Kummissjoni Nazzjonali Anzjani	L-ideja li socjeta anzjana hija ta' piz finanzzarju għas-socjeta u ma tistax tkun sostenibbli trid tigi kkonfrontata. Huwa ta' sodisfazzjon kbir li kemm l-irgiel kif ukoll in-nisa ser jibdew jgħixu għal zmien itwal. Dan għandu jkun apprezzat minn kulhadd u jitqies bħal grazzja u mhux disgrazzja.	Should be inserted
3.3.2 Promoting Social Cohesion	Kummissjoni Nazzjonali Anzjani	<p>L-istrategija għall-Inkluzjoni Socjali tal-Kummissjoni hija l-aktar iffokata fuq ix-xogħol għax temmen li tista tilqa hafna għal Eskluzjoni Socjali. Fl-opinjoni ta' l-AGE (network ta' 148 għaqda li jirrapreżentaw 22 miljun anzjan fl-Ewropa) din mhiex is-soluzzjoni biex jitharsu l-interessi ta' l-anzjani kontra l-faqar u l-eskluzjoni.</p> <p>L-ISSUES li jehtiegu attenzjoni speċjali huma:</p> <ul style="list-style-type: none"> <li>• Id-Dhul Finanzzarju</li> <li>• Id-Diskriminazzjoni</li> <li>• Is-Sahha</li> <li>• Id-Dipendenza</li> <li>• L-Isolament</li> </ul> <p>Dwar ix-xogħol jidher li l-għan propost fil-Lisbon Agenda, li sas-sena 2010 ir-rata ta' min jahdem fil-faxxa ta' bejn 55-64 titla' sa 50% mhux ser jintlahaq.</p>	Should be inserted
3.3.2 Promoting Social Cohesion	MCST	<p>New bullet:</p> <p>Enhance the work/life balance through various measures (such as, for example, teleworking, home working, etc.) as a result of an increase in skills training among the present and potential workforce.</p>	Should be inserted
3.3.2 Promoting Social Cohesion	MCST	We have to think on how Science and Techology can contribute towards more social inclusion.	Should be inserted
3.3.2 Promoting Social Cohesion	MCST	<p>Amend bullet 3 as underlined:</p> <p>Ensure sustainability of pension and social welfare schemes <u>irrespective of gender</u> in the context of increased life expectancy, ageing population and other socio-demographic changes.</p>	Should be inserted
3.3.2	MEPA	This section could usefully draw in some of the main prioties and targets of the National Action Plan	All national

Promoting Social Cohesion		on Social Inclusion.	sectoral strategies should feed into the strategy and vice-versa. This should be the role of Ministries' representatives on the NCSD.
3.3.2 Promoting Social Cohesion	Ministry for the Family and Social Solidarity	Bullet 3: Add the words " and adequacy" immediately after the word sustainability. The same insertion is to be made on page 58 under the heading Fostering Sustainable Communities, immediately after the words Ensure sustainability. Although at first sight these additions may seem cosmetic, they are indeed very important in terms of Govt policy as declared in the White Paper on Pensions just published, as well as in terms of the Lisbon Agenda.	Should be inserted
3.3.2 Promoting social Cohesion	Ministry of Health, the Elderly and Community Care	MHEC has successfully submitted a project for EU funding under the European Social Fund Facility, which is directed towards the further integration of women in the health care workforce through various training initiatives. This is in line with the objectives under this section, namely the "attraction of more women into the labour force in view of their relatively lower rate of participation".	No need to amend.
3.3.2 Promoting Social Cohesion	Ministry of Health, the Elderly and Community Care	The draft document has not given sufficient weight and attention to the issue of sustainable development for the health and social sector. The strategy in this document focuses deeply on environmental issues but seems to treat the economic and social aspects more superficially. Overall there is no balance and this imbalance may be reflected in the implementation strategy.	An attempt has been made to widen the focus of the strategy by taking on board comments made during the public consultation phase.
3.3.2 Promoting Social Cohesion	Moviment Graffiti	Given that Malta has the highest illiteracy rate and the lowest level of post-secondary students in the EU, stipends should be retained at post-secondary and tertiary level to encourage students to further their studies.	Should be inserted the general principle that "environmental educational

			projects with international co-operation should be carried out as happened in various instances in the past”.
3.3.2 Promoting Social Cohesion	Moviment Graffitti	Streaming at primary and secondary schools should be abolished. Sociological studies, both local and international, confirm that streaming results in class reproduction and inequality in educational achievement.	Partly Should be inserted by inserting the statement that “Moreover, a review of streaming in primary and secondary schools should be carried out in order to evaluate whether this system is enhancing inequality in educational achievement.”
3.3.2 Promoting Social Cohesion	Moviment Graffitti	Affordable and accessible day care centres should be introduced by the Government to encourage women to seek gainful employment. Sociologists argue that the lack of day care centres is one important factor which explains the low level of female gainful employment in Malta.	Should be inserted
3.3.2 Promoting Social Cohesion	Moviment Graffitti	Social benefits such as paid parental leave and optional reduced hours should be extended as family-friendly measures.	Should be inserted
3.3.2 Promoting Social Cohesion	National Council of Women	Elderly women are among the most likely to be poor. Inactive women do not pay for their pension. A safety net for such persons is essential.	Should be inserted
3.3.3	Focus Groups	Finally, a topical cross-cutting issue is ‘work-life balance’, since it touches key issues such as work,	Should be inserted

Fostering Sustainable Communities		family life, stress, female participation in workplace rates, education and childhood, urban living and human health.	
3.3.3 Strengthening Public Health	Focus Groups	The issue of infrastructure provision related to sports makes up an important element of quality of life and preventative health care. This could be incorporated in the health section.	Should be inserted
3.3.3 Strengthening Public Health	MCST	New Bullet: Promote research into preventative health care and health education including diseases most prevalent in Malta (such as, eg., cardiac, diabetes, asthma)	Should be inserted
3.3.3 Strengthening Public Health	MCST	New bullet: Promote a national environmental health action plan supported by research into environmental and occupational health related diseases.	Should be inserted
3.3.3 Strengthening Public Health	Ministry of Health, the Elderly and Community Care	<p>This section deserves further elaboration in view of the current scenario where the development of health and health care in Malta has become unsustainable within the current model. The draft strategy provides a comment on the costliness of the health care service. This is not only due to the increasing elderly but also due to other drivers such as cost of new medicines, new technology and increased activity levels. The MHEC feels that healthcare issues, in the perspective of sustainability have not been treated with sufficient depth. Quality issues and standards in healthcare sector and how these could be adversely affected unless sustainable development of this sector is addressed have not been mentioned in the document. MHEC would therefore like to propose the inclusion of the following material in the national strategy for sustainable development.</p> <p>The public health sector is experiencing funding shortfalls as it becomes increasingly difficult for Government to supply the necessary resources to match spiraling demands. This, notwithstanding the fact, that between 1993 and 2002, recurrent expenditure for health and long-term care in the public sector has increased by 71%. Although our healthcare system has been commended by the World Health Organisation as being one of the best in the world, this achievement is being threatened. Waiting lists for certain services and the financial difficulties in introducing new medicines will affect access. Quality is being affected by the overcrowding phenomenon, a phenomenon that is entirely due to the impact of the aging population and their health and long term care needs.</p> <p>These challenges are not unique to Malta and are being faced ubiquitously across Europe. Malta's accession to the European Union has given health professionals easier access to the health care market overseas. It has also bestowed certain rights on patients. This scenario continues to make further demands on the financing and resourcing of the health care sector.</p>	Should be inserted

		<p>In order to address these challenges the following strategic directions should be included:</p> <ul style="list-style-type: none"> <li>• Introduce changes to the mechanism of health care funding in order to render it sufficient and sustainable</li> <li>• Introduce higher efficiency gains coupled with accountability and transparency for public resource utilisation</li> <li>• Refocus away from curative care towards healthy living and prevention</li> <li>• Involve of all stakeholders including health care workers and patients in health care policy</li> </ul> <p>Furthermore, it should be recognized that the difficulties being faced now are set to increase as a result of the changing demographic situation over the coming two decades.</p>	
3.3.3 Strengthening Public Health	Ministry of Health, the Elderly and Community Care	MHEC is proposing that decision making in the health sector become more transparent. All key stakeholders should be involved in determining the priorities and the mechanism of funding the identified priorities in a sustainable and equitable manner. Good industrial relations are a sine qua non for the promotion of sustainable development with shared commitment from all partners.	Should be inserted
3.3.3 Strengthening public health	National Council of Women	Central focus on primary care is needed. Patients must be left as much as possible in their own community thus, for example, days in hospital must be minimised, persons must be integrated back to their workplace as soon as possible. Home based services in the EU are becoming always more important.	Should be inserted
3.3.3 Strengthening public health	National Council of Women	Government does not provide any funds for breast-feeding. More breast feeding leads to lower imports of infant products and less waste as well as healthier women and children	Should be inserted
3.3.3 Strengthening public health	National Council of Women	Elderly must be left in their own environment as much as possible.	Should be inserted
3.3.3 Strengthening Public Health	Youth Consultation	promotes the protection of the environment in order to provide a better standard of living and a higher level of public health. Open spaces and urban recreational green areas need to be a necessary aspect of planning policies, such as pedestrian village cores;	Should be inserted
3.3.3 Strengthening public health	Ministry of Health, the Elderly and Community Care	MHEC feels that the strategy in this document does not provides recommendations for a national public health policy. This is essential to ensure that other policies incorporate a healthy public policy dimension.	Should be inserted

		MHEC proposes that health impact assessments (HIA) are conducted with ex-ante evaluation of public policies prior to their implementation. HIA is a structured method for assessing and improving the health consequences of projects and policies and is a means to ensure that health is taken into consideration when designing and executing policies in other areas of the economy.	
3.3.4 Education for Sustainable Development	Education Division	Direct reference to the educational dimension is made in section 3.3.4 where, in less than a page, the present situation within the formal sector, is defined and in one small paragraph shortcomings are cited and suggestions made for ' a clear policy (which) remains to be Should be inserted about education for sustainable development in the NMC ' (p. 37). It needs to be pointed out that the issue of sustainable development is tackled in another subject apart from those referred to, namely Home Economics.	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	Strategy does not take on the concept of Lifelong learning limiting itself almost exclusively to National Minimum Curriculum in compulsory education, ie criticising without making concrete suggestions for way forward in other areas.	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	Strategy wrongly equates Education for Sustainable Development with Environmental Education thus ignoring other curricular areas such as Technology Education, Education for Democratic Citizenship and Human Rights Education.	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	Although lip-service was given to non-formal and informal education there is no hint of a strategy for sustainable development education for other bodies apart from schools . (eg NGO's)	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	No hint at adult education and for including sustainable development education in both initial and continuing Vocational Education and Training.	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	No mention of the media as a vehicle for sustainable development education.	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	One might also mention the UNESCO Associated Schools and PMO Western Mediterranean Project UNESCO which have been working on Sustainable development for several years, including several annual PMO Summer Camps (In Malta 2002 organised by International Relations Section DSSIR)	Should be inserted without mentioning specific organisations.

3.3.4 Education for Sustainable Development	Education Division	Environmental Education can be included as one of the topics that schools will get funds from the NCC to conduct a project.	No need to be specific since this would fall under the funding section.
3.3.4 Education for Sustainable Development	Education Division	Being the European Year of Citizenship through Education, a thrust can be made in the direction of young eco citizens.	Not relevant now since the year has passed.
3.3.4 Education for Sustainable Development	Education Division	If people are to participate we need to promote a culture of participation. The media is leading the way with 'phone in' programmes but we need to start from the schools with roles for every stakeholder defined and people trained for that role. One important point is developing participation in School Councils and encouraging (even mandating) Student Councils. If we leave things to chance we stand no chance of moving quickly and perhaps things may never happen at all. Schools have had a trial period but now we need to show we mean business.	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	We also need to better exploit existing resources through wider co-operation. E.G. the NSO which has made great strides recently is engaged in giving information to certain bodies, but could give a service to schools as well. In UK the <u>stats 4 schools</u> programme is available online complete with teacher resources. This is how one builds a culture of making informed decisions which is vital if we are to increase competitiveness.	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	Train green leaders and all necessary people, then give schools a deadline by when they are to become environmentally friendly schools. Maybe this should be staggered in three phases. Monitor compliance. This should be included in the external audit.	Should be inserted
3.3.4 Education for Sustainable Development	Education Division	The new Design and Technology curriculum which is being introduced in Secondary Schools will promote values in relation to safeguarding the environment. The Ministry disposes of all obsolete computers through WasteServ Ltd.	Should be inserted
3.3.4 Education for Sustainable Development	Focus Groups	The section on education could provide more direction in terms of what values should be promoted (responsibility, pride, a more open and tolerant outlook, an 'ethic of care', less bullying, etc).	Should be inserted
3.3.4 Education for Sustainable Development	General Workers' Union	In order to instil and nurture the values of Sustainable Development they should feature prominently in the school curriculum.	Should be inserted
3.3.4	Gozo consultation	Public awareness and education on the subject are necessary.	Should be inserted

Education for Sustainable Development	meeting		
3.3.4 Education for sustainable development	Heritage Malta	Traditional Maltese lifestyles included many of time-honoured strategies to optimize sustainable use of the limited and fragile resources of a small island context. Educational programmes at all levels should explore this traditional knowledge base and use it to help today learn about, maintain or revive sustainable strategies that developed historically in a Maltese context. The interpretation of archaeological and historic sites to the public may play a significant role in this process.	Should be inserted
3.3.4 Education for Sustainable Development	Individual	The Strategy has to stress more on Education and informative systems. There should be more awareness on environmental issues.	Should be inserted
3.3.4 Education for Sustainable Development	MCST	New bullet: Design positive measures to encourage students, in particular women, to take up scientific careers.	Should be inserted
3.3.4 Education for Sustainable Development	MCST	New bullet: Create measures and opportunities to retain skilled human resources to retain experts and reduce the brain drain.	Should be inserted
3.3.4 Education for Sustainable Development	MCST	New bullet: Ensure that the whole educational system equips students with relevant life skills such as creativity, critical thinking, and develops inquisitiveness, tolerance, solidarity, respect for diversity, self-discipline and skills for research (PSD exists as a subject but should be expanded to include all schoolchildren).	Should be inserted
3.3.4 Education for Sustainable Development	MEPA	Environmental issues on the local scene should be included in scholastic curricula in order to educate students of all ages and hence make them aware of the problems and threats faced by local biodiversity.	Should be inserted
3.3.4 Education for Sustainable Development	MEPA	University still lacks a first degree in environmental science. Moreover, basic knowledge on the environment should be included in most if not all courses at all levels.	Should be inserted
3.3.4 Education for Sustainable Development	MEPA	The former EPD was a local pioneer in disseminating environmental information on the internet.	No need to amend.
3.3.4 Education for Sustainable	MEPA	Education for sustainable development could also involve introducing modules relating to the environment in University and other courses, which will eventually lead the students to deal with	Should be inserted

Development		these issues at their workplace. Such courses to be targeted include architecture, engineering, teaching, etc.	
3.3.4 Education for Sustainable Development	National Council of Women	The educational system has improved and it cannot be stated that it is ignoring aspects of sustainable development.	Should be inserted
3.3.4 Education for Sustainable Development	National Council of Women	Problem of illiteracy still exists. This problem must be eliminated.	Should be inserted
3.3.4 Education for Sustainable Development	National Council of Women	Curriculum not developed enough to include environmental, waste management, home management. Hotels need to cater for the specific needs of particular groups as elderly.	Should be inserted
3.3.4 Education for Sustainable Development	National Council of Women	“A” level and intermediate level syllabi need to incorporate sustainable development.	Should be inserted
3.3.4 Education for Sustainable Development	National Council of Women	Education in schools has radically improved. A culture change is very difficult. The selfishness of people causes environmental problems. Streaming of students in schools in itself ingrains selfishness in children.	Should be inserted
3.3.4 Education for Sustainable Development	National Council of Women	Women need preparation for mothering. Adequate childcare centres are essential.	Should be inserted
3.3.4 Education for Sustainable Development	NGOs consultation	NGOs should target government to educate it about renewable energy priorities, and the hefty penalties Malta will be incurring due to pollution from energy production.	Should be inserted but widened to other areas not just renewable energy.
3.3.4 Education for Sustainable Development	Youth Consultation	There is the need for education on sustainable development not only in formal education but especially in a non-formal setting to reach those people who would not attend conferences or seminars on the subject. The notion of “Environmental Studies” in schools needs widening.	Should be inserted
3.3.4 Education for Sustainable Development	Youth Consultation	It is important to educate teachers, politicians and other professionals.	Should be inserted
3.3.4 Education for Sustainable Development	Youth Consultation	The need is felt for greater accessibility of young people to the environment was also mentioned during the meeting. There should be the proper planning of nature trails and cycle lanes. People, and especially young people, have to be in touch with the environment in order to appreciate it.	Should be inserted

3.3.4 Education for Sustainable Development	Youth Consultation	Research is important. While the strategy remarks that there is lack of information, a number of theses and specialised studies are deposited at the library of the University of Malta and are rarely consulted if not for research purposes by other students or researchers. This research offers an excellent venue for the involvement of young people (young students/researchers). The work of young analysts can be diffused to a wider audience by promoting it better, not least through the use of the internet.	Should be inserted
3.3.4 Education for Sustainable Development	Youth Consultation	Environmental awareness should be stepped up and promoted as an intrinsic attitude;	Should be inserted
3.3.4 Education for Sustainable Development	Youth Consultation	Environmental awareness programmes and projects should be included in the national curriculum from the early school years.	Should be inserted
3.3.4 Education for Sustainable Development	Youth Consultation	Programmes in environmental management and protection, in which young people can participate, such as the establishment of new Nature Reserves, should be set up.	Should be inserted
3.3.4 Education for Sustainable Development	Youth Consultation	Young people are to be encouraged to adopt environment-friendly measures, such as the use of recycled paper and energy-saving apparatus.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	Focus Groups	The issue of strengthening local communities could also be given more prominence, perhaps by stressing the need for in-kind government support to local voluntary associations.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	Individual	The need is felt to enhance women's participation in decision and policy making.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	Individual	The government, the business community, non-governmental organizations and trade unions should promote gender equality. Towards this end there is the need to challenge and change negative and stereotypical attitudes and assumptions regarding female participation in decision making and policy making. In this regard it is imperative to sensitise members of these organizations to the need for equal opportunities for women and men and the positive benefits that women bring to the work place	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision Making	MCST	Amend bullet 2 as underlined: Devise schemes to enable people to acquire sustainable development skills required for effective participation <u>in order to strengthen democratic practices.</u>	Should be inserted

3.3.5 Promoting Stakeholder and Major Group participation in Decision-Making	Ministry for Urban Development and Roads	A culture of public consultation with stakeholders and research should be the norm with regard to Government policy development and programme implementation. With regard to Sustainable Development, the principles of the Aarhus Convention should be practised. Malta is a signatory of this convention, which emphasizes the importance of public consultation and access to information.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision Making	Ministry of Health, the Elderly and Community Care	The Ministry of Health, the Elderly and Community Care recognizes the fact that public participation in decision-making is an essential factor for sustainable development. In addition, it should be emphasized that the remarkable effort of the National Sustainable Development Strategy aims to promote convergence between the interests of current and future generations. In this dimension, the Ministry of Health, the Elderly and Community Care acknowledges that the strategy drawn up in this document is overall a very positive initiative and is conducive to improvements in social concerns quality of life in general.	No need to amend.
3.3.5 Promoting Stakeholder and Major Group Participation in Decision Making	Moviment Graffitti	Civil Society representation and participation should take place in all levels of decision making in Malta and Gozo. Non-Governmental Organisations, Local Councils and other civil society organizations should be consulted by right. Civil society representatives should also form part of boards of national institutions such as MEPA, MCESD, NCSD, Broadcasting Authority, Malta Resources Authority, Malta Transport Authority, etc.. Such representatives should be chosen by civil society groups and not appointed by Government.	Should be inserted for some bodies but not all of those mentioned.
3.3.5 Promoting Stakeholder and Major Group Participation in Decision Making	Moviment Graffitti	MCESD should incorporate the environment and sustainable development as an important pillar with regard to Economic and Sustainable Development. Environmental NGO representation should be included in MCESD.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision Making	Moviment Graffitti	NGO Legislation should be introduced at the earliest. NGOs are facing various problems due to the lack of legislation. NGOs are charged VAT and pay taxes but then cannot benefit from Bank Guarantees due to their non-legal status. For this reason NGOs are also finding difficulties in tapping EU opportunities for funding. The NGO white paper should be issued as soon as possible and the consultation process should be at least 8 weeks long. In this regard, Government should take heed of opinions of different NGOs, which may have different needs and concerns which are to be taken into account in order that NGO Legislation may be comprehensive and truly representative of civil society. Principles such as freedom of association and freedom of expression should be guaranteed through NGO legislation.	Should be inserted

3.3.5 Promoting participation in decision making	National Council of Women	Opinions of persons that do not have a high level of education should be incorporated in the Strategy.	An attempt was made to include in the strategy all comments received.
3.3.5 Promoting participation in decision making	National Council of Women	Visible results must come out of the sustainable development strategy rather than being another exercise in lip service. Everyone must take responsibility and do their small share to promote sustainable development. Stumbling blocks faced in implementation of the strategy experienced abroad must be taken into account to prevent from such problems occurring in Malta.	Should be inserted
3.3.5 Promoting participation in decision making	National Council of Women	Best way to reach grassroots is through media as other methods may result in a gender bias.	Should be inserted
3.3.5 Promoting participation in decision making	National Council of Women	Both political parties need to raise awareness for environmental protection and depoliticise the environment issue.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	NGOs consultation	Often consultation in Malta is only paid lip service. People who take part in consultation exercises need to be shown that <u>what they say has been followed-up</u> . The view of NGOs by government is fragmented, and there is a serious <u>need for a legal framework for NGOs</u> . Until NGOs are considered viable social partners by Government, sustainable development will be difficult to implement.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	NGOs consultation	The economic and moral weight of NGOs should not be underestimated. In EU 15, NGOs account for 10% of GDP. One important area that NGOs are concerned about is the lack of transparency and accountability. For example NCSD meetings are not announced in the press.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	NGOs consultation	NGOs should also have places on important decision-making committees such as MEPA and MCESD.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	Youth Consultation	Environment and related issues should feature more prominently on the agenda of the Malta Council for Economic and Social Development (MCESD).	Should be inserted

3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	Youth Consultation	A number of participants complained that government entities do not always make available environment data.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	Youth Consultation	The involvement of local councils and, especially, the people of a particular locality in the preservation of their immediate surroundings, is important.	Should be inserted
3.3.5 Promoting Stakeholder and Major Group Participation in Decision-Making	Youth Consultation	Young people should be assisted to take an active role in the protection and improvement of the environment for a sustainable future.	Youth is implied in the term 'local communities'.
3.3.6 Raising Public Awareness	MCST	Amend bullet 2: Promote an understanding of the environmental information and science in general available in a way that it can empower stakeholders and the public in general to fully comprehend the dimensions and the implications of the issues involved.	Should be inserted
3.3.6 Raising Public Awareness	UHM	The culture of open consultation, which in the last few years has been consolidating itself, raises the level of consciousness about current issues. It also makes the actors who shape and influence policy making aware of their responsibilities to show solidarity to the present and future generation.	Should be inserted
3.3.6 Raising Public Awareness	Youth Consultation	Create an awareness of the perils of pollution and to minimise its presence in any form.	Raising public awareness deals with all issues and therefore there is no need to mention all issues regarding which awareness should be raised.
3.4.1 The Need for Integrated Planning	MCST	Cross-cutting issues The Strategy should take account of other national strategies being developed such as the MCESD work and the recently launched ICT Strategy in order to exploit possible areas of synergy.	Should be inserted
3.4.1	MCST	New Bullet:	Should be inserted

The Need for Integrated Planning		Use foresight methodologies in strategic planning processes.	
3.4.1 The Need for Integrated Planning	MEPA	Main Strategic direction with regard to integrated planning: The relationship between an integrated spatial development plan and the Structure Plan needs to be further explained.	NCSD has to decide on the role of the ISDP.
3.4.1 The Need for Integrated Planning	United Nations Division for Sustainable Development	If I understand correctly, the NSDS is seen largely as a framework strategy which should guide and be implemented through the Integrated Spatial Development Plan (ISDP). In many respects, I think that this is an excellent proposal. It avoids duplication and supports real integration. My concern is that the ISDP, however comprehensive it might be, could not take into account everything in the NSDS. How would those issues be accommodated?	The NCSD needs to decide on the role of the ISDP.
3.4.1 The Need for Integrated Planning	United Nations Division for Sustainable Development	What is the relationship between the NSDS and the proposed ISDP, on the one hand, and the waste and tourism strategies, on the other? Perhaps it would be good to specify this as well.	The NCSD needs to decide on the role of the ISDP.
3.4.1 The Need for Integrated Planning	United Nations Division for Sustainable Development	The functions that are proposed for the National Commission for Sustainable Development are consistent with our approach. A body, and presumably the Commission, should monitor implementation, guide the review and redrafting stages, foster public participation, ensure the flow of information, and promote sustainable development., as well as undertake other activities Malta may wish to encourage (e.g., working on indicators). What is not clear to me is this: if the NSDS is largely implemented through the ISDP, then what would be the role of the Commission vis-a-vis the MEPA? What is the current relationship between these two bodies?	The NCSD needs to decide on the role of the ISDP.
3.4.2 Indicators and Target Setting	General Workers' Union	Since Malta is lagging behind in many aspects (for example in the use of renewable energy) the strategy for sustainable development should set out short, medium and long term targets. A demarcation of stages would give a better sense of direction. Otherwise the gap between targets and achievement may remain wide.	Targets, indicators and priorities are currently being set.
3.4.2 Indicators and Target Setting	Individual	I am wary of accepting strategies that do not include the indicators and the actions that will be taken to achieve the strategies.	Targets, indicators and priorities are currently being set.
3.4.2 Indicators and Target Setting	Malta Enterprise	Integrate and frame sustainability indicators within the context of a national balanced score card.	Indicators are still being set up.
3.4.2 Indicators and Target Setting	MEPA	An omission, which is surprising since much work on this has been done by a number of different bodies in Malta, is the lack of use of indicators – to tell us where we are (current state) and, over time,	Targets, indicators and priorities are

		whether we are heading in the right direction (monitoring).	currently being set.
3.4.2 Indicators and Target Setting	MEPA	New bullet: Provide/Promote funding for the monitoring of the chosen indicators.	This is already included in section 4.6 (Co-ordinating and funding the strategy).
3.4.2 Indicators and Target Setting	Ministry for Urban Development and Roads	Quantified objectives may be important in the implementation stage for policy makers, especially since the strategy is for a specific time frame.	Targets, indicators and priorities are currently being set.
3.4.3 Promoting use of Economic Instruments	Youth Consultation	Fiscal measures (e.g. eco-contribution) should be introduced which should discriminate on the basis of clear environmental objectives. The social dimension of such measures, which should be seen to be introduced only in the best interest of the environment, should be taken into account when devising the measures.	Should be inserted
3.4.4 Enforcement	General Workers' Union	Non compliance with the provisions laid down in the Environment Protection Act seems to be quite rampant. Sometimes this is done in a defiant manner. This type of attitude and behaviour tends to undermine the plan for sustainable development.	Should be inserted
3.4.4 Enforcement	General Workers' Union	Non compliance to and /or lack of enforcement of the law may be due to the diffused practice of patronage and clientelism in Maltese culture. Political polarisation may sustain rather than reduce this practice.	Should be inserted
3.4.4 Enforcement	Gozo consultation meeting	Local enforcement has to be highly active and efficient.	Should be inserted
3.4.4 Enforcement	Individual	There is a significant amount of legislation in this aspect. The next step should be to strengthen up enforcement sections and adapt a Zero Tolerance attitude towards Crimes against the Environment.	Should be inserted
3.4.4 Enforcement	Individual	The proposed law prohibiting the concurrent use of Aqualungs and Harpoons should be Should be inserted .	Should be inserted
3.4.4 Enforcement	MCESD	There is need for further enforcement of existing legislation	Should be inserted
3.4.4	MCST	There is skepticism relating to the implementation of the Strategy when one thinks of the problems of	Targets, indicators

Enforcement		<p>enforcement of environmental regulations. A number of strategy points are either:</p> <ul style="list-style-type: none"> <li>(a) contemplated in the national law, or</li> <li>(b) commitments assumed under <u>binding</u> international treaties, (conventions, protocols), or</li> <li>(c) provisions in EU Council Directives, or</li> <li>(d) functions that are included in the performance mandate of a Government Agency.</li> </ul> <p>As such these are willy-nilly “<u>must-do</u>” items --- since laws are there to be obeyed. If observance of a law is to be a platform for a strategy, then, one should, at least, state clearly who is to obey it, and/or which Government Agency is to enforce it, possibly indicating the means and a time-frame.</p>	and priorities are currently being set.
3.4.4 Enforcement	MEPA	<p>New Bullet</p> <p>The need is felt for more capacity building with respect to enforcement.</p>	Should be inserted
3.4.4 Enforcement	MEPA	<p>New bullet:</p> <p>Settlement of disputes out of court with money channelled to environmental improvement should be encouraged.</p>	Should be inserted
3.4.4 Enforcement	Tourism Consultation	Enforcement of existing regulations is weak.	Should be inserted
3.4.4 Enforcement	UHM	The flexibility, which seems to be a characteristic of Maltese society, is being exploited by persons who tend to be insensitive to the harm their actions may be causing to the environment and the economy. It is high time to be more rigid in the application and enforcement of the law.	Should be inserted
3.4.4 Enforcement	Youth Consultation	There is fragmentation and lack of integration of enforcement practices. Enforcement of existing laws goes beyond simply punishing offenders.	Should be inserted
3.4.5 Promoting International and Regional Co-operation	Malta Enterprise	Explore and Evaluate possibility for signing other International Investment Agreements and Double Taxation Treaties with other countries particularly with US, China, Japan and India.	Should be inserted
3.4.5 Promoting International and Regional Co-operation	MCST	<p>New bullet:</p> <p>Cooperate with international organisations such as NGOs in local capacity building by identifying, promoting and supporting activities in the area of sustainable management of environmental resources.</p>	Should be inserted

3.4.5 Promoting International and Regional Co-operation	MEPA	Care needs to be taken to ensure that all current international commitments have been taken on board, for example in Section 2.6, all Section 3, 4.3 and 5.3.	Meeting of NCSD of 5 <sup>th</sup> December 2005 decided against listing all international commitments in the strategy.
3.4.5 Promoting international and regional co-operation	Ministry for Urban Development and Roads	<p>More emphasis should be made on international cooperation with other overseas policy makers in this field. This could be achieved through perhaps through further integration within the following:</p> <ol style="list-style-type: none"> <li>1. "Barcelona Process"</li> <li>2. The "new" Members States (perhaps Cyprus) who joined in May 2004</li> <li>3. One of the "original" fifteen member states</li> <li>4. One of the Commonwealth nations either Canada, Australia or New Zealand (have similar set up to Malta)</li> <li>5. Small Islands and States</li> </ol> <p>The following links may be interesting in this regard:  <a href="http://www.sustainable-development.gov.uk/links/location/int.htm">http://www.sustainable-development.gov.uk/links/location/int.htm</a>  <a href="http://www.sustainable-development.gov.uk/indicators/index.htm">http://www.sustainable-development.gov.uk/indicators/index.htm</a></p>	Should be inserted
3.4.5 Promoting international and regional co-operation	Ministry for Urban Development and Roads	<p>It would also be useful to include data from Malta as against other countries in the report.</p> <p>By adopting more of this "knowledge sharing" type of benchmarking process would create an "information pool" of useful policy information to be exchanged between parties and developed into key policy formulation. This would prevent any further "reinventing of the wheel", By determining what is the "best in class" on an international level could be applied to any number of the objectives in the strategy. Benchmarking could become the "central ingredient" of the policy.</p>	Should be inserted
3.4.5 Promoting international and regional co-operation	Ministry of Foreign Affairs	Para. 2, second sentence to read: "This is evidenced by Malta's active participation in a number of international organisations such as the United Nations and its Specialised Agencies, the Commonwealth (delete Secretariat), the OSCE, the Council of Europe, the International Maritime Organisation (IMO), the World Intellectual Property Organisation (WIPO) and the International Telecommunications Union (ITU)." Delete AOSIS since Malta	Should be inserted

		withdrew from the Alliance in May 2004. It is also being suggested that the words "planet Earth" be replaced by "our planet".	
3.4.5 Promoting international and regional co-operation	Ministry of Foreign Affairs	Para. 3 to read: "The commitment of Malta to the ideals of the United Nations, particularly in the environmental sphere, is evident in the leading role played by Malta when in 1967 it introduced the concept of the Common Heritage of mankind to the international seabed and ocean floor and the subsoil thereof leading to the adoption of the 1982 United Nations Convention of the Law of the Sea, and in 1989 initiative on the Protection of Global Climate for present and future generations of Mankind."	Should be inserted
3.4.5 Promoting International and Regional Co-operation	Movement Graffiti	Malta's neutral status should be emphasized. This is a major determinant of Malta's status as a country that can actively promote peace, diplomatic solutions and global justice. As one of the few remaining countries in the EU, Malta's role is even more important.	Should be inserted
3.4.6 Cross-cutting Strategic Issues	Focus Groups	Respondents brought up institutional concerns that are currently partly addressed in the Strategy under Enforcement and Integrated Planning. While these two items are very important foci for institutional strengthening, participants took a wider view of environmental governance. It is considered that this issue could be better addressed under section 3.4 in a new sub-section on institutional strengthening. This could focus on a process to ensure greater transparency, accountability, access to justice, efficiency and customer care within government. It would be best if this remained separate from section 3.4.1 on integrated planning (since this is more content- than procedure-oriented) and section 3.4.4 on enforcement (for this to retain its importance).	Although the comments relating to substance have been inserted, the comments relating to format were not inserted.
4.1 Institutionalising the development of the Strategy	Courts of Justice Division	The Division's contribution to sustainable development is: maintaining adequate staffing levels in this Division and the Public Service in general; public officers being made more accountable for their actions; more efficiency and better quality of service	Should be inserted
4.1 Institutionalising the development of the Strategy	Courts of Justice Division	The division is improving its Customer Care Service (Prospective Enhancement of Reception Area); improving the Quality of Service to the public (Setting up of Courts of Justice Website); the Court premises are being made more and more accessible to persons with a disability (setting up of slopes outside the main entrance); Officers are being made more accountable for their actions especially where Finance is concerned.	The principles underlying these actions have been inserted in
4.1 Institutionalising the	Focus Groups	There is a strong link between values, institutional structures, environmental quality and the idea of 'progress'. Institutional concerns are an important issue. It is therefore recommended that an expert in	No amendment required.

Development of the Strategy		public sector reform or governance be engaged to review the Strategy with a view to strengthening this area.	
4.1 Institutionalising the Development of the Strategy	General Workers' Union	Rendering the Coordination Unit at the Public Works Department more effective, and maybe setting a similar unit at national level, may go a long way in providing the coordination of tasks and the coherence of policies that are essential to reach the targets set out in the draft.	Should be inserted .
4.1 Institutionalising the Development of the Strategy	MCESD	The document deals with overarching principles and directions, and rightly, does not go into details of individual projects. The strategy must be properly implemented in an integrated manner so that it will not remain another report.	No amendment required.
4.1 Institutionalising the Development of the Strategy	MCST	Resources in Malta are not only limited to natural resources - of which we have hardly any - but also human resources.	Should be inserted .
4.1 Institutionalising the Development of the Strategy	MEPA	<p>It is not clear that an 'independent' Commission is the most appropriate mechanism for the preparation and, more importantly, the implementation of a Sustainable Development Strategy. To be effective, the Strategy needs to be a Government Strategy, and a statement of Government policy, including specific targets, programmes and actions, which Government will meet/carry out to implement the Strategy.</p> <p>As it is, it appears the Strategy has been prepared without any reference to Government – and the document recommends the establishment of a permanent body to review and implement the Strategy. It is not clear however that such a body would be able to implement the Strategy except by exhortation. It may be that Government will adopt the Strategy in its final form and take it forward but this still remains problematic, given the lack of involvement in its preparation; the potential for conflict between parts of the Strategy and other Government policy, the lack of commitment and, more importantly, the lack of finance for implementation measures.</p>	Amendment should be inserted stating that if Government adopts the Strategy, then Government will be responsible for its implementation.
4.1 Institutionalising the Development of the Strategy	MEPA	There is a problem with implementation especially by other government departments. There are also concerns about how much the various agencies working in the environmental field will actually be able to coordinate their activities, especially in terms of strategic planning.	Same as above.
4.1 Institutionalising the Development of the Strategy	MEPA	There are no major objections to the Strategy; the major concern is with implementation. Stronger enforcement, self-discipline and education are essential pre-requisites for sustainable development. Malta needs to focus much more on enforcing legislation.	Should be inserted

4.1 Institutionalising the Development of the Strategy	Moviment Graffitti	Meetings by the National Commission for Sustainable Development should be advertised, open to all.	The Environment Protection Act stipulates that the meetings are to be open to the public.
4.1 Institutionalising the Development of the Strategy	Moviment Graffitti	The National Commission for Sustainable Development should have clear contact information.	Although important, this point need not be should be inserted in the Strategy.
4.1 Institutionalising the Development of the Strategy	Moviment Graffitti	Green Leaders in Ministries should sit on the National Commission for Sustainable Development.	Sustainable Development goes beyond just 'green' issues. Moreover, Ministries are already represented on the Commission. So no need to amend.
4.1 Institutionalising the Development of the Strategy	Moviment Graffitti	It should be ensured that all representatives actively participate in NCSD meetings.	Although this point is important, there is no need to insert it in the Strategy.
4.1 Institutionalising the Development of the Strategy	Moviment Graffitti	Civil Society representatives should be chosen by Civil Society groups.	Should be inserted .
4.1 Institutionalising the Development of the Strategy	NGOs consultation	An action plan is needed for the NSSD to be implemented, and the plan must be based on coordinated decision-making between government departments. Targets aren't enough. Actions are needed to implement the targets.	Should be inserted in 4.2
4.1 Institutionalising the Development of the Strategy	Youth Consultation	The NCSD should have its own permanent secretariat so as to ensure the maximisation of its potential, the proper follow-up and monitoring of key issues and the suitable implementation of the strategy for the Sustainable Development of the Maltese Islands.	The NCSD will not be responsible for the actual implementation but

			for monitoring the implementation.
4.1 Institutionalising the Development of the Strategy	Youth Consultation	An adequately restructured NCSD could be given the additional task of serving as the body representing the interests of future generations at an institutional level. This could be one alternative to setting up a separate body such as a Guardian/Commission for Future Generations. The institutionalisation of generational justice should be included as one of the proposals in the Strategy for Sustainable Development, independently of whether the guardianship of future generations is entrusted to NCSD. This is already sustained by the ethical dimension of sustainable development (2.4), which should translate itself into a proposal for institutionalisation under sections 4.1 and 4.2. Other countries' initiatives and models of institutionalisation of intergenerational justice (e.g. Hungary and Israel) should be looked at closely once the strategy document's proposals reach the stage of implementation. A think-tank on this matter should be created within the NCSD itself once the strategy starts being implemented.	Should be inserted
4.2 Identifying Responsibilities and Structures	Local Councils Association	Very often Local Councils are blamed for inefficiencies and carelessness in major roads which are under the jurisdiction of the central government.	No need to include in the Strategy.
4.2 Identifying Responsibilities and Structures	MEPA	The report should indicate the need for better coordination, for example, on fly tipping, between MEPA and WasteServ.	This is a very specific example. The Strategy refers to the importance of better co-ordination. So there is no need to amend.
4.2 Identifying Responsibilities and Structures	MEPA	It would be best if an implementation plan, however, was more focused on the short to medium-term, for example from 2005 to 2010. This would also align it with other international processes such as the EU Sixth Environment Action Programme (EAP), which has a time frame of 2001-2010.	Should be inserted .
4.2 Identifying Responsibilities and Structures.	Ministry of Health, the Elderly and Community Care	In the implementation of the strategy there is identification of the drivers of environmental aspects and of economic aspects but not of the social perspective. It should be ensured that the health sector is equipped with the necessary structures and systems in order to implement the relevant components of this strategy.	This issue is already included within the phrase "strengthen national capacities".

4.3 Setting Targets, Monitoring and Evaluation	Gozo consultation meeting	Targets set to reach the required goals in order to promote sustainable economic development, must be bound with certain principles.	Targets will be prioritised. So no need to amend.
4.3 Setting Targets, Monitoring and Evaluation	Gozo consultation meeting	Deadlines must be established and action should be taken for the implementation of the <i>Agenda 21</i> programme.	Deadlines will be established for the targets of the Strategy and not of Agenda 21.
4.3 Setting Targets, Monitoring and Evaluation	MCST	In general, the Strategy currently reads more as an overview of the current situation. More work needs to be done to define the vision and strategy by setting clear targets with timeframes, implementing entities and resources required.	Targets are being prioritised.
4.3 Setting Targets, Monitoring and Evaluation	MEPA	Arising in part from the mode of and mechanism for preparation, the Strategy lacks specific targets, which would make it more concrete. The lack of targets and the width and diversity of the 'strategic directions' (many of which are not actually strategic directions but actions) mean that it may be too ambitious; undirected or unfocused; and unprioritised. There is no clear picture of the relative importance of the strategic directions and what precisely we want to achieve in relation to them within any specific time frame.	Targets are being prioritised.
4.3 Setting Targets, Monitoring and Evaluation	MEPA	In order to make the Strategy more implementable, it could, perhaps in its accompanying implementation plan, outline costs and who is responsible for the proposed measures, and to prioritise and indicate a time frame for implementation. The Strategy could also indicate where human resources are needed for sustainable development. The document needs to take into account the new EU financial perspectives, and the EU Sustainable Development strategy.	Targets are being prioritised. Resources required are included in the phrase "strengthen national capacities".
4.3 Setting Targets, Monitoring and Evaluation	MEPA	Care needs to be taken to ensure that all current international commitments have been taken on board, for example in Section 2.6, all Section 3, 4.3 and 5.3.	The NCSD meeting of 5 <sup>th</sup> December 2005 decided against such an approach.
4.3 Setting Targets, Monitoring and Evaluation	MEPA	Amend Bullet 3/Line 2 The word 'indicators' may be unnecessary in this line.	Should be inserted
4.3	NGOs consultation	Whenever the Strategy's targets are presented they should be shown with what the EU is expecting	The NCSD

Setting Targets, Monitoring and Evaluation		from us.	meeting of 5 <sup>th</sup> December 2005 decided against such an approach.
4.4 Devising Participatory Schemes	Education Division	On p 49, reference is made to the development of Local Agenda 21 where links between Local Councils and the local community are encouraged, that is, for the informal sector of environmental education. It is important to note that Local Agenda 21 needs to cover not just the informal but also the formal environmental education sector (that is, local primary school and the regional secondary and post-secondary institutions). The targets should go beyond awareness but should work towards ownership and empowerment within these educational institutions.	Should be inserted
4.4 Devising Participatory Schemes	Local Councils Association	The role of the Local Councils is of major importance for the administration of the Maltese Islands. However the sustainability of this role can be enhanced if there is better liaison between the central government, the parastatal authorities and the Local Councils.	Should be inserted
4.4 Devising Participatory Schemes	MCST	Take into account other strategies such as the National ICT Strategy. Strategic Objective 5 of this Strategy in fact is: Introduce e-Government services into new public realms such as e-Health, e-Education and e-Environment, all aimed at making a direct positive impact on the quality of life.	Should be inserted
4.4 Devising Participatory Schemes	MEPA	The NCSD may be involved in the review of strategic environmental assessments (SEAs). SEA should be extended to cover sustainability aspects of proposed plans and programmes.	SEA scope and procedures are regulated by the SEA directive which has now been transposed into Maltese law.
4.4 Devising Participatory Schemes	MEPA	The Commission should be vested with some executive power; otherwise it will remain a talk-shop.	The Environment Protection Act as it is at the moment gives only consultative status to the Commission. Moreover, it is proposed in the

			Strategy that the Commission will not be responsible for implementation.
4.4 Devising Participatory Schemes	Moviment Graffitti	The importance of the Aarhus Convention should be amplified. Malta is a signatory of this convention, which emphasizes the importance of public consultation and access to information. In this regard Government agencies, Local Councils, etc.. should be obliged to carry out public consultation when legislation is proposed.	Should be inserted
4.5 Collaboration between the Public and the Private Sectors	MCST	The public-private balance is not given sufficient attention. The fact that certain services like water and electricity are subsidized does not provide an economic incentive on the part of the private sector and consumers to invest in renewable. There needs to be serious consideration to the creation of incentives for industry to invest in clean technologies.	Should be inserted in 3.1.3
4.5 Collaboration between the Public and Private Sectors	MEPA	The private sector could take several roles in promoting sustainable development. It may be involved in research, in the drafting and implementation of management plans for Special Areas of Conservation, in the selection and monitoring of indicators. It is vital that the private sector engages with the drawing up of the strategy in order to aid in its implementation.	Should be inserted
4.5 Collaboration between the Public and Private Sectors	MEPA	The Science and Technology community could contribute to sustainable development through research projects, which lead to the establishment of environmental baseline datasets that are necessary in order to inform policy.	Should be inserted
4.5 Collaboration between the Public and the Private Sectors	Moviment Graffitti	Collaboration between these two sectors should not result in the Public Sector's abdication of certain responsibilities (f.eg social and environmental). The Public Sector has a vital leading role with regard to Sustainable Development. Sustainable Development should not be dictated by concepts such as profit maximisation and laissez-faire free markets, but should be guided by concepts such as environmental protection, social inclusion, equality, and so forth. Furthermore, the Private Sector operators should be obliged to live up to their various social and environmental responsibilities.	Should be inserted
4.5 Collaboration between the Public and the Private Sectors	UHM	There have been a number of cases when actions by government and/or officials did not conform to the principles and ethics of sustainable development. Governments should act as a model. Such contradictions tend to undermine any plan or strategy about sustainable development.	Should be inserted

4.5 Collaboration between the Public and the Private Sectors	Youth Consultation	Government entities and departments should lead by example in all areas that fall within the specific targets of the strategy for sustainable development (e.g. waste-separation).	Should be inserted
4.5 Collaboration between the Public and the Private Sectors	Youth Consultation	Greater assistance to be given to NGOs in order to help them push forward the strategy for sustainable development. These include incentives for the creation and strengthening of NGOs and entrusting them with the management of sites, as is already the case in some areas.  There is an urgent need for the publication of legislation in order to regulate and regularise the existence of NGOs in Malta.	Should be inserted
4.6 Coordinating and Funding the Strategy	Individual	The strategy as presented lacks such actions, costs and priorities and thus remains a vague adaptation of principles that can hardly be argued with, without any consideration of their relative cost of implementation or timeframe. That notwithstanding the issue of stormwater flooding is unmentioned, and the re-use of treated sewage effluent is glossed over.	Targets are being prioritized and actions will be drawn up. Flooding comments Should be inserted in 3.1.10 and comments on re-use of sewage treatment Should be inserted in 3.1.6
4.6 Co-ordinating and Funding the Strategy	Local Councils Association	There is not enough liaison between government departments and authorities and local councils. Often new roads resurfaced by Local Councils at great expense are re-opened by WSC or ENEMALTA soon after.	The issue of co-ordination has been Should be inserted in 4.1.
4.6 Co-ordinating and Funding the Strategy	Local Councils Association	Local Councils are underfinanced for new devolved works they are asked to carry out.	Should be inserted
4.6 Co-ordinating and Funding the Strategy	MEPA	The issue of funding underlies many of the measures that are needed for sustainable development. The Strategy could indicate from where this to be secured.	The Strategy is not specific about sources of funding. It refers mainly to 'domestic' sources.
4.6 Co-ordinating and Funding the Strategy	United Nations Division for Sustainable	Finally, whatever form the implementation plan takes, we would hope that it would prioritize, be specific and identify costs and financing.	Priorities are being drawn up. NCSD has to decide which

	Development		target priorities it is to present to Government for adoption.
5.1 Revising the Strategy	MCST	It is important to employ foresight techniques where both sustainable development and social issues are concerned.	Should be inserted
5.1 Revising the Strategy	MCST	<p>The Strategy needs to take account of other national strategies such as the MCESD work and the recently launched ICT Strategy in order to exploit possible areas of synergy, e.g. the National ICT Strategy makes reference to sustainable development as follows:</p> <p>Strategic Objective 3</p> <ul style="list-style-type: none"> <li>• Develop an eHealth system together with health on-line</li> <li>• Develop ICT instruments to develop solutions to support sustainable development, forecast adverse natural or meteorological conditions and assist rapid reaction to manmade disasters.</li> </ul> <p>Strategic Objective 5</p> <ul style="list-style-type: none"> <li>• Introduce e-Government services into new public realms such as e-Health, e-Education and e-Environment, all aimed at making a direct positive impact on the quality of life</li> </ul>	The general principle has been Should be inserted
5.1 Revising the Strategy	MCST	The Strategy needs also to take into account and build on other strategies developed at a more micro level, e.g. the water, tourism and transport strategies being deployed by the responsible authorities. The Strategy mentions no structural arrangements for achieving inter-sectoral coordination and it is recommended that a coordination structure for bringing together the relevant authorities and other entities at least on half-yearly basis is contemplated. This will improve coherence of missions and efforts. There needs to be a review of policy structures in Government in order to facilitate joined-up policies for sustainable development. It is also recommended that two key positions are opened up in Government at the highest levels: a Sustainability Watchdog and a Chief Scientific Advisor to the Prime Minister. The latter would be responsible for overseeing that national and international sustainability commitments are complied with and that strategic advisory reports (especially those commissioned by Government) are given due consideration. It is important that Government sets an example by introducing good practices for sustainable development in the public sector.	Should be inserted
5.1	MEPA	There is potential for a closer involvement of the industry sectors in environmental policy making	Should be inserted

Revising the Strategy		processes, in terms of agreeing a time frame for phasing in the new policy. Industry should be more involved in the process of drawing up the Strategy.	in 5.2
5.1 Revising the Strategy	MEPA	There is no doubt that the local economy is based on a number of unsustainable activities, eg. quarrying, waste landfilling, unsustainable mobility patterns. The Strategy should highlight the main unsustainable activities going on in Malta. A number of such activities cannot be phased out in the short term without significant implications on the economy and social sectors. The strategy should provide guidance on how unsustainable activities can be phased out and possibly replaced by sustainable ones.	Should be inserted
5.2 Ongoing consultation	UHM	In the case of Sustainable Development it would be healthier if consultation is held with the political class rather than with Government officials. As a trade union the UHM confirms its commitment to the goals set in the draft about sustainable development.	Should be inserted
5.2 Ongoing consultation	MCST	Many strategies fail because they are either unrealistic (given the country's size and budgetary and resource constraints) or because they do not achieve the required buy-in from all the stakeholders. Consultation with stakeholders has become common-place (a sine qua non), however the Strategy has to go beyond this and be based on real consensus-building.	Should be inserted
5.3 The Priorities	Focus Groups	When choices are made in the course of prioritising issues, the impacts on different groups should be evaluated and made explicit.	Should be inserted
5.3 The Priorities	Individual	A Strategy without any prioritisation indicates a document without focus and without a will for implementation.	Priorities are being drawn up.
5.3 The Priorities	MEPA	Care needs to be taken to ensure that all current international commitments have been taken on board, for example in Section 2.6, all Section 3, 4.3 and 5.3.	The NCSD meeting of 5 <sup>th</sup> December 2005 decided against such an approach.
Appendix	MEPA	The appendix is useful and it effectively summarises the strategy	No need to amend
Executive Summary	MEPA	p. 5 s. 2 A Sustainable Development Strategy for the period 2004-2009 is too short and should be extended further and in line with the criteria mentioned under section 1.4 on page 9 " <i>have a long-run perspective and an ethical dimension with regard to future generations</i> ". The need for development of a strategy with a long-term vision is referred to throughout the document whenever reference is made to future generations.	The Strategy is being proposed to cover the period to 2010 in order to achieve clear targets.

General	Education Division	There should be a number of documents on each main section (Education being one of them). Each should deal with sustainability.	Strategy has to be concise. Therefore no amendment is required.												
General	Education Division	The draft puts the major emphasis on the actual proper management of the environment and its resources in Malta. There is only a brief overview of the different dimensions which, need to be in place to assure the proper management of the environment and its resources. In the draft, the dimensions specifically named are the democratic, the ethical and the political dimensions but in these pages no reference is made to the educational dimensions.	The education dimension has been enhanced in the report.												
General	Focus Groups	<p><b>Major specific Recommendations</b>  <i>A Vision for Sustainable Malta</i>  The findings from the focus groups regarding a vision for the future may be summarised as below. It is recommended following the discussion of this within the NCSD, that a vision statement is be incorporated in the Strategy, based on the vision findings from Question 3 but also on substantive debate within the editorial team of the NSSD and the NCSD. <i>Prioritisation of Issues</i>  The Table below lists the priorities that emerged from the focus group discussions. This list should, together with findings from the rest of the consultation process, be an important input for the priorities chosen for the implementation of the Strategy at least for the first years of its life. It is suggested that these priorities are debated along with the Vision within the editing team of the NSSD and also within the NCSD in order to arrive at a final list of priorities for the first term of the NSSD.</p> <table border="1"> <tr> <td><b>Society</b></td> <td> <ul style="list-style-type: none"> <li>Education (based on improving values: 'Christian values, human values', respect - and better parenting and instilling national pride)</li> <li>Gender issues (women's issues, sexual abuse, prostitution)</li> <li>Addressing particular social issues (drug abuse, stress, immigration) and areas of deprivation (e.g. Valletta and Cottonera)</li> <li>Access to social services (health care, pensions)</li> </ul> </td> <td></td> </tr> <tr> <td><b>Environment</b></td> <td> <ul style="list-style-type: none"> <li>Pollution and Waste</li> <li>Protecting the sea</li> <li>Protecting historical heritage</li> <li>Cleanliness and maintenance</li> </ul> </td> <td></td> </tr> <tr> <td><b>Economy</b></td> <td> <ul style="list-style-type: none"> <li>Wages that allow people to live decently (with respect particularly to house prices)</li> <li>Jobs and the economic sustainability of the agriculture and tourism industries</li> </ul> </td> <td></td> </tr> <tr> <td><b>Institutions</b></td> <td> <ul style="list-style-type: none"> <li>Governance and enforcement (efficiency, governance, customer care, discipline, enforcement with harsher penalties, even for Government)</li> </ul> </td> <td></td> </tr> </table>	<b>Society</b>	<ul style="list-style-type: none"> <li>Education (based on improving values: 'Christian values, human values', respect - and better parenting and instilling national pride)</li> <li>Gender issues (women's issues, sexual abuse, prostitution)</li> <li>Addressing particular social issues (drug abuse, stress, immigration) and areas of deprivation (e.g. Valletta and Cottonera)</li> <li>Access to social services (health care, pensions)</li> </ul>		<b>Environment</b>	<ul style="list-style-type: none"> <li>Pollution and Waste</li> <li>Protecting the sea</li> <li>Protecting historical heritage</li> <li>Cleanliness and maintenance</li> </ul>		<b>Economy</b>	<ul style="list-style-type: none"> <li>Wages that allow people to live decently (with respect particularly to house prices)</li> <li>Jobs and the economic sustainability of the agriculture and tourism industries</li> </ul>		<b>Institutions</b>	<ul style="list-style-type: none"> <li>Governance and enforcement (efficiency, governance, customer care, discipline, enforcement with harsher penalties, even for Government)</li> </ul>		<p><b>Priorities will be Should be inserted by NCSD and proposed to Government following the feedback from the public consultation.</b></p>
<b>Society</b>	<ul style="list-style-type: none"> <li>Education (based on improving values: 'Christian values, human values', respect - and better parenting and instilling national pride)</li> <li>Gender issues (women's issues, sexual abuse, prostitution)</li> <li>Addressing particular social issues (drug abuse, stress, immigration) and areas of deprivation (e.g. Valletta and Cottonera)</li> <li>Access to social services (health care, pensions)</li> </ul>														
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		<b>Transport</b>	• Improve transport system (better roads and alternative to cars)	
General	Focus Groups	<p>Restructuring of Strategy</p> <p>A vision statement and set of priorities should be should be inserted . The vision statement could possibly be incorporated in Chapter Two, however some device will be needed to link it to the strategic directions put forward in the various sections of the Strategy. It is suggested that an overall strategy for the document, could be prepared, which would be about half a page long and indicate the overall direction of the Strategy for its first term. This would, along with the vision statement, serve to integrate the various sub-sections of the Strategy, such as for example land use and health care This could also sit in Chapter Two, and this change might be easier if much of the more informational and theoretical material currently in Chapter Two was moved to the introductory chapter. This material follows logically on (or informs) the choice of criteria originally used to develop the strategy (the criteria are listed in Chapter One on pages eight and nine). Chapter Two could also present and explain the breakdown of the NSSD into the four main headings as listed on page six.</p>		Priorities will be should be inserted . Regarding a significant re-formatting of the document this was not possible due to time constraints.
General	Focus Groups	<p>It is also important that the timeframe for the Strategy be made clear, so that even if, for example, the vision is for where Malta should be in one generation's time (25 years), the overall strategy would be for what should be done in the first five, for example, or for the first 10 years.</p>		Strategy will be for 5 years.
General	Gozo consultation meeting	<p>The Strategy has to stress more on education and informative systems. There should be more awareness on environmental issues.</p>		Effort has been made to enhance the education dimension.
General	Individual	<p>There is a contradiction with the adoption of the declaration of all of Malta as a Nitrate Free Zone and the re-use of treated sewage. This issue is not entered into. The strategy is generally undermined throughout with a lack of supporting data to most of its assertions, except those in the well researched field of spatial planning.</p>		The Strategy is not meant to be an academic paper with footnotes to every assertion.
General	MCST	<p>Is sustainable development only related to the environment?</p>		No. In fact, following the public consultation, other facets of sustainable development have been amplified.
General	MCST	<p>The document would be more manageable and easier to refer to if headings, paragraphs and bullets were to be numbered.</p>		This can be made when the final

			version of the document is agreed to.
General	MEPA	Although the Executive Summary says (p6) “A number of strategic directions are proposed with regard to each heading. These are followed by proposed measures as to how the strategy could be implemented”, as noted above, there is, in fact, little differentiation between ‘strategic directions’ and implementation measures – this tends to lead to a loss of focus and will make prioritisation difficult. In addition many of the strategic directions, although desirable, are too general. There seem to be a mixture of policies, broad strategy and actions, as well as goals and objectives in the document. These need to be sorted out to make the document easier to read.	Priorities and targets to be achieved will need to be clear.
General	MEPA	The document needs an overall strategic direction rather than so many small ones. It tends to include too many so-called “strategic directions” and somehow it needs a clearer focus and greater coherence, together with specific targets – only in this way will it become a Strategy capable of informing policy and of implementation.	The NCS D meeting of 5 <sup>th</sup> December 2005 decided that there should not be many targets.
General	MEPA	Most, if not all, proposed strategic directions are too general for e.g. “require the construction industry to adopt measures for sustainable use of stone and resources and reduce noise and dust pollution impacts on residential amenity”. This strategic direction is wide and could be subject to a variety of interpretations. At the same time it is limited because it excludes measures to reduce the impact of noise and dust on biodiversity. It is recommended that a parallel document is drafted, whereby each strategic direction is resolved into tangible and prioritised measures that can be quantified and monitored. Each measure could be targeted for different sectors of the society, be it citizens, government or industry. For example, one specific measure could be to reduce the amount of inert waste generated by excavation of rock for purposes of laying foundations. In this case, the construction industry could be required to excavate such stone in a similar manner to that used in quarries in order to use mineral resources efficiently. At the same time, it is recognized that such details may, in part, be the subject of the Integrated Spatial Development Plan being proposed under section 3.4.1, and of other strategies such as the National Biodiversity Strategy. Thus although the strategy is wide-ranging and mentions many different sectors, the suggestions are vague and do not give a clear indication of what the way forward should be. This makes the Strategy subject to interpretation rather than proposing clear guidelines on how to achieve sustainable development in Malta.	Detailed action plans will not form part of the Strategy. Otherwise the Strategy will lose its strategic value.
General	MEPA	The Editor may wish to consider whether using gender inclusive language, i.e. avoiding the use of the	Should be inserted

		term 'man' when referring to human beings, may be advisable in a document promoting sustainable development.	
General	MEPA	Such a strategy may be required to be subjected to an SEA. An SEA should be done if it starts post 21 July 2004. It is exempted if it starts before 21 July 2004 and is approved before 21 July 2006.	The process for adopting the Strategy started in 2003 and should be approved prior to 21 July 2006. So there is no need for an SEA according to this comment.
General	Ministry for Urban Development and Roads	Ministries' Green Leaders should form part of the National Commission for Sustainable Development.	Sustainable Development goes beyond just 'green' issues. Moreover, Ministries are already represented on the Commission. So no need to amend.
General	Ministry of Health, the Elderly and Community Care	The strategic direction proposed in this document advocates sustainable development at a national level. The objectives established throughout the document aim to integrate these principles, and the Ministry of Health, the Elderly so far reaffirms the overall positive contribution of this document.	No need to amend.
General	Moviment Graffiti	Moviment Graffiti agrees with the general thrust of the Draft Sustainable Development Strategy for Malta (July 2004).	No need to amend.
General	United Nations Division for Sustainable Development	Very few strategies that we have seen really address economic and social issues, or cross-cutting issues. Another particularly good feature of the strategy is the extent to which it tries to integrate itself with other national strategies, and vice versa. This is an element largely missing from most strategies. And the same is true for the section on enforcement. Overall we found the strategy to be quite excellent in many respects.	No need to amend.
General - Strategic Directions	MEPA	It is not clear how some of the "main strategic directions" relate to the discussion which precedes them – and there is some overlap with later topics (which illustrates the problems of integration both	Some overlaps do occur. As far as

		in this document but more critically in the real world)	possible there was an effort to relate the directions with the discussions preceding them.
Glossary	MEPA	Include a glossary of terms and a list of abbreviations (for example, GDP, MTA, R&D, WHO, NGO). A minor note: sometimes items are referred to by their acronyms and sometimes in full (for example GDP and MTA).	This can be done after the approval of the strategy document.
Gozo	Gozo consultation meeting	Amend as underlined: Renewable energy sources, notably sun and wind, are not extensively used in Malta, although they have immediate local application. <u>Solar energy is used more in Gozo than in Malta. This has to be encouraged.</u> Solar water heating can offset a substantial proportion of annual generation, avoiding emissions of CO2. <u>The tourist industry can benefit from the use of the solar energy.</u>	Should be inserted
Gozo	Gozo consultation meeting	Transport between Malta and Gozo be considered as a merit good.	A section on Gozo is required.
Gozo	Gozo consultation meeting	SMEs should be encouraged to set up businesses in Gozo by giving them special incentives such as for example providing appropriate land space where these can start their business.	Should be inserted
Gozo	Gozo consultation meeting	Gozo should be advertised as a separate destination as regards tourism.	Should be inserted
Gozo	Gozo consultation meeting	An improvement of the transport systems is necessary. The number of vehicles in Gozo is on the increase. A more viable transport system is needed. Public transport in Gozo, in particularly land transport, is very scarce and inefficient. The idea of introducing smaller buses should be studied.	A section on Gozo is required. However, the comments are not wide enough to address adequately sustainability issues in Gozo. It is suggested that a section on Gozo is prepared which also incorporates such comments.
Gozo	Gozo consultation	There should be ongoing monitoring and revision of the Gozo-Malta transport.	See above

	meeting		
Gozo	Gozo consultation meeting	Particular emphasis was made regarding the fact that strategies and solutions devised for Malta may not necessarily be ideal for Gozo as well. It was suggested that the NCSO should have permanent, professional and reliable representation from Gozo. In the draft strategy the island of Gozo was not mentioned at all.	See above
Gozo	Gozo consultation meeting	Inter-island transport should be improved.	See above
Gozo	Gozo consultation meeting	Transport within the island should also be improved.	See above
Gozo	Gozo consultation meeting	Gozo has special needs and different solutions have to be found from that from mainland Malta. The consultants are to be professional Gozitans or specialists on Gozo issues.	See above
Gozo	Individual	Public transport in Gozo should be routed so as to be more efficient and practicable. From Mgarr harbour two vehicles can utilize two routes, one passing through Xewkija, Sannat and Munxar to Victoria and the other taking in Qala, Nadur and Xaghra. One of the vehicles can then go on to Gharb, Ghasri and St. Lawrence.	See above
Gozo	Individual	An improvement of the transport systems is necessary. The number of vehicles in Gozo is on the increase. A more viable transport system is needed. Public transport in Gozo, in particularly land transport, is very scarce and inefficient. The idea of introducing smaller buses for regular transport services should be studied.	See above
Gozo	Individual	New bullet: There should be ongoing monitoring and revision of the Gozo-Malta transport.	See above
Gozo	Individual	Gozo has special needs and different solutions have to be found from that from mainland Malta. The consultants are to be professional Gozitans or specialists on Gozo issues.	See above
Gozo	Individual	Gozo is not only the island, the building and the environment. Most of all Gozo is the people of Gozo.	See above
Gozo	Individual	Lack of unemployment opportunities, particularly for the white collar people (presently even for the labourers), coupled with exorbitant property prices are constraining young couples to move to Malta and remain there so that their children will not face the same difficulties they themselves are facing today. In the meantime property prices are now only reachable by well off Maltese and foreigners	See above

		who are making Gozo as their retirement residence. We cannot allow Gozo to become a place for old aged citizens only. Otherwise it will become a Ghost Island.	
Gozo	Individual	The characteristics of the villages need to be preserved. Hence MEPA should look well into this phenomenon before it is too late and make it more easy for young couples hailing from a village to own a residence in their own village of birth.	See above
Gozo	Individual	<p><b>Small Firms: Introduction</b></p> <p>The chances of survival of Gozo's small firms in a competitive setting depend on their ability to exploit the advantages and/or to minimise the disadvantages associated with small size.</p> <p>Gozo is a small island forming part of the Maltese archipelago, with an area of about 67 sqr km and a population of about 30,000. Its economy depends heavily on agriculture, tourism, and the public sector.</p> <p>The average size of firms is smaller than that of mainland Malta, and many firms are family businesses, often consisting of one or two employees. Small firms in Gozo operate in all sectors, ranging from retailing to small manufacturing enterprise. Many provide services for tourists.</p> <p>The manufacturing sector is in decline in the Maltese and even more so in Gozo, calling for a re-consideration of the type of activities which are sustainable in Gozo and which can offer the added benefit of synergies with other sector.</p> <p>The agricultural and fisheries sector is overall rapidly declining in the Maltese Islands. However in Gozo the potential to build on the relatively strong contribution of the sector to exploit high value market niches involving synergies with areas such as specialist tourism and environmental management.</p> <p>Construction activity may be reaching a saturation point in the Maltese Islands but their is in Gozo the potential to combine the skills in construction with the maintenance of the architectural heritage, offering the possibility of synergies with specialist tourism;</p> <p>The services sector is perhaps the only area showing a significant growth in Gozo, but it is still relatively underdeveloped in Gozo. There are opportunities for the creation of better-established year-</p>	See above

		<p>round tourist-based activities. Opportunities also exist in ICT.</p> <p>Gozo has distinctive qualities represented by a unique cultural and historical heritage and strong traditions in artisan and agricultural products.</p> <p>Gozo maintains a closely-knit society where the extended family and village connections can serve to prop the more vulnerable members of society. A generally good degree of social cohesion exists on the Island. The Gozitan society has been influenced to some degree by returned migrants. Rich returned migrants show off (or maybe express gratitude) by naming their houses after the countries to which they emigrated (eg USA, Australia and Canada) and from which they generated considerable income.</p>	
Gozo	Individual	<p><b>Small Firms: Special Disadvantages</b></p> <p>Gozitan small firms face a number of special disadvantages, arising from the following features:</p> <ul style="list-style-type: none"> <li>▪ Gozo is a small island depending on another small islands for its industrial supplies leading to “double insularity” and high transport costs</li> <li>▪ The domestic market is very small and local firms must either remain very small and inefficient or seek markets outside the Gozitan territory.</li> <li>▪ Gozo has a very fragile ecosystem, and there are various environmental constraints imposed on Gozitan business.</li> </ul> <p>As a result, many small Gozitan firms have very limited possibilities for exploiting the benefits of economies of scale, limited funds for research and development, and limited diversification possibilities.</p> <p>However, small Gozitan business enjoy a number of advantageous characteristics:</p> <ul style="list-style-type: none"> <li>• Business operators in Gozo tend to be very motivated and committed to their business</li> <li>• They are very flexible and tend to quickly adapt to changing circumstances.</li> <li>• They are very conscious of the need to seek market niches (particularly in the tourism sector and in agriculture).</li> </ul> <p>These positive and negative features are not mutually exclusive, and may offset or reinforce each other. The fact that many small businesses have survived and seem to be able to compete with larger firms, in the developed as well in the developing world, would seem to suggest that in many cases the positive aspects associated with small size outweigh the negative ones.</p>	See above

Gozo	Individual	<p><b>Small Firms: The Chances of Survival</b></p> <p>Many small Gozitan firms will face the risk of closing down if they fail to compete in a fiercely competitive setting. With the removal of import controls, a pre-requisite for EU membership, those enterprises producing goods and services which can easily be substituted with imports from the EU will be forced to either meet international competition or else close down.</p> <p>The Maltese and Gozitan experience in the past decade or so would seem to indicate that in a liberal setting, the overall economy, including the small firms, perform better than in a protective framework. One reason for this is probably the fact that in a liberalised framework, firms are forced to become more efficient, and generate more income per unit of time. However small Gozitan firms face serious constraints in this regard, as already explained.</p>	See above
Gozo	Individual	<p><b>Small Firms: Conclusion and Policy Implications</b></p> <p>Government policy should be conducive towards maximising the advantages of small size and minimising the disadvantages. The foregoing discussion suggests that the chances of survival of small Gozitan firms will be enhanced through a policy of business support, in order to help small firms (a) exploit niche markets (b) enhance competitiveness (c) improve access to funds and (d) encourage modern business attitudes.</p> <p><i>Help small firms exploit niche markets</i> The object of such policy measures should be to help Gozitan producers set up business in speciality Gozo products such as food and crafts. Demand for such products depends of quality rather than on price, enabling small firms to avoid competition with mass produced goods. In such circumstances, smallness need not be a disadvantage.</p> <p><i>Enhance Competitiveness</i> Small firms in Gozo who want to invest in improving efficiency should be encouraged to do so through special schemes intended to step up competitiveness. There are a number of areas where the Government can and should intervene, not to promote protection, but to enhance a competitive framework.</p> <p><i>Access to Funds</i></p>	See above

		<p>Policies aimed at supporting small firms should seek to reduce the disadvantages associated with raising funds. Small firms are not generally organised as shareholding entities, and they cannot offer as much collateral funds as larger firms when it comes to borrowing funds.</p> <p><i>Change of Business Attitudes</i> Educational schemes should be put in place to encourage and promote business attitudes, conducive towards an understanding of the dynamics of a liberalised market, promoting flexibility and adaptation to change, and fostering a drive towards for high quality products.</p>	
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