

# National Strategy for the Environment

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## Public Consultation Document September 2022



The Gozo Business Chamber's Feedback to the Public Consultation Document

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**THE GOZO BUSINESS CHAMBER**

## 1. Introduction

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The Chamber notes with satisfaction this document which outlines clear actions for Gozo, and therefore adopts a regional approach. It also tries to involve stakeholders at all levels and sets out the complex context in which this strategy needs to be implemented. An important approach that has been adopted for this strategy is that it links with other national strategies that have been developed, thus ensuring a joined-up approach. The integrated and joined-up approach adopted throughout the whole strategy is to be commended.

## 2. The Specifics

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One of the positive aspects of this document is that it tackles construction and quarrying activities. The measures being advocated including the strict enforcement and inspection at construction sites (p. 18), and the establishment of building codes, are important steps for the regulation of the industry. The strategy also highlights that the “the construction regulatory framework will be further revised, implemented and enforced accordingly, putting wellbeing and quality of life at the forefront” (p. 31).

Another important point being advocated by this strategy is that of ‘understanding the economic cost of air pollution’ (p. 19). Assigning a cost to the damage that is being created is necessary for a country to adopt effective policies to curb this damage. The Chamber also agrees with making the integration of green infrastructure mandatory in major projects (p. 29).

The Chamber is also pleased to note the development of indicators such as the index of citizen’s wellbeing in relation to the sustainability of towns and villages (p.33). There is a sustained effort across the board to move away from indices which are focused only on the economy. A healthy economy cannot exist without having a healthy society. Consequently the development of such indices underlines the need to have a comprehensive overview of our society and economy which goes beyond merely monetary terms. It is only then that we will be able to create long-term economic value for all.

The management of Natura 2000 areas is also one of the key parts of the strategy. It is important that concrete measures are taken and actual monitoring carried out of the activities being undertaken in a particular area. The Chamber believes that Natura 2000 sites such as Dwejra and also Ta’ Ċenċ can also provide rich touristic experiences including also in related and ancillary activities such as walking, diving, and climbing. However, it is important that clear guidelines are provided and actual monitoring takes place. This also applies to protected coastal zones which may experience overfishing or where pleasure boating is causing irreparable damage in certain coastal areas, especially where it comes to the waste affluent from boats, and the uncontrolled anchoring. Moreover in areas where the anchoring of pleasure boats is being allowed, there is a significant impact of noise pollution from these same vessels. In many areas monitoring of what actually happens is currently non-existent. As regards planning it must be clear that no development is permissible on Natura 2000 sites except for that which is necessary for the actual maintaining of the site from an eco-system perspective.

The Chamber also agrees with the proposal to reduce construction and demolition waste (pp. 55 – 56) especially “the use of rock-cutting methodologies that enable the re-use of the excavated stone blocks as a valuable stone resource.” It is important to note as well that “waste management infrastructure will be integrated into the design of new buildings” (p. 59). In this area education/formation coupled with an adequate framework of taxation and incentives will be key to sustain the modal shift in this industry.

As regards the use of land resources which falls under Strategic Goal 5, there should be a holistic rethinking about a regional planning policy for Gozo. The present national planning framework has clearly failed the island of Gozo actually promoting the present overdevelopment and speculation. The Chamber would also like to positively note the drive identified in the strategy to “integrate and synchronise the national land governance structure in order to establish systematic lacunae that hinder achieving efficient and environmentally sound land-use, and as a result also addressing any economic

costs” (p. 66). Though the involvement of the Gozo Regional Development Authority (strategic objective 5.3) is positively noted, the proposal of a regional planning approach for Gozo should be considered.

An interesting and important part of this document is that it specifically tackles how this change should be sustained (‘Strategic Goal 8 – Enabling and Empowering the required Green Transition’). As regards businesses it is important to note that “ways in which the business community can take a stronger role in assessing the costs and impacts of green policy decisions on local businesses during the formulation of such policies, will be sought” (p. 118). This section also includes measures such as the uptake of strategic management accounting for environmental costs (p. 117). The Chamber understands that this involves a change in the strategic mindset for most businesses. While some initiatives may be achieved for larger businesses, one must take into account the reality of microbusinesses in both Gozo and Malta, where a more practical approach may need to be implemented to ensure a change in their mindset. This might be accompanied by a change in Malta’s taxonomy to favour businesses which are making the green transition.

### **3. The Importance of Adopting a Regional Approach**

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While the formulation of this strategy is a necessary step, it is important that a regional dimension is also adopted. Similarly to what the Chamber has been advocating for planning policies, a regional approach is also required when it comes to the environment. Both from a business and a community level the landscape in Gozo is significantly different from that of the main island of Malta.

In Gozo there is a significant predominance of micro businesses. Moreover the tourism dynamics have significantly changed with foreign inbound tourism being highly seasonal and a shift to an ever increasing reliance on domestic tourism, leading to significant pressure on the region’s infrastructure during the holiday season and weekends. Thus for example from a waste perspective the large proportion of Maltese people who have a second home in Gozo will not encourage for proper waste separation. On a negative note the lack of services during weekends may lead to the disposal of waste prior to when it is supposed to be collected. Consequently it is important that entities such as the Gozo Regional Development Authority, the Gozo Regional Council, and entities such as the Gozo Action Group Foundation, and also the Gozo Business Chamber and the Gozo Tourism Association are consulted upon in order to have specific initiatives for the island.

Such an approach for example is adopted as regards strategic objective 6.4 where the potential of Gozo’s Blue Economy is sought to be examined (p.90):

Furthermore, understanding and addressing regional challenges, such as Gozo’s double insularity, will be sought in recognition of environmental limits. In this respect, Gozo’s feasibility in serving as a hub and a showcase of sustainability initiatives and projects that contribute to the blue economy will be explored.

This regional approach should permeate all the actions that are undertaken to protect the environment.

### **4. Conclusion**

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Overall this document diverts from many other documents in that from a policy perspective it integrates the outcome and efforts of other national entities and their respective policy documents and actions. It also calls for joined-up efforts across multiple governmental entities.

The document also has an important regional perspective which should be continued to be developed further with the input of all stakeholders concerned.