

Ministry for European Affairs and Implementation of the Electoral Manifesto

STRATEGIC ENVIRONMENTAL ASSESSMENT ON MALTA'S NATIONAL RURAL DEVELOPMENT PROGRAMME FOR THE PROGRAMMING PERIOD 2014-2020

ENVIRONMENT REPORT

Version 2: September 2014



Report Reference:

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THIS IS A DIGITAL COPY OF THE REPORT.

RESPECT THE ENVIRONMENT – KEEP IT DIGITAL



NON-TECHNICAL SUMMARY

- 1. This non-technical summary summarises the Environmental Report, which describes the Strategic Environmental Assessment (SEA) in relation to Malta's Rural Development Programme 2014-2020 (RDP). The Rural Development Programme 2014-2020 (RDP) is coordinated by the Rural Development Managing Authority within the Ministry for European Affairs and Implementation of the Electoral Manifesto (MEAIM).
- 2. The assessment was carried out in accordance with the SEA Regulations (Legal Notice 497 of 2010), which transpose the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

RURAL DEVELOPMENT PROGRAMME 2014-2020

- 3. Regulation (EU) No 1305/2013 on support for Rural Development by the European Agricultural Fund for Rural Development outlines the following objectives:
 - (a) fostering the competitiveness of agriculture;
 - (b) ensuring the sustainable management of natural resources, and climate action;
 - (c) achieving a balanced territorial development of rural economies and communities including the creation and maintenance of employment.
- 4. These objectives are then supported by six Priorities and related Focus Areas, see **Table 1**. Furthermore specific actions and interventions are prescribed as Measures based on the articles contained within Regulation (EU) No 1305/2013's Articles.



Table 1: RDP Priorities and Focus Areas

Priority 1: Fostering knowledge transfer and innovation in agriculture, forestry, and rural areas with a focus on the following areas:

Focus Area IA: Fostering innovation, cooperation, and the development of the knowledge base in rural areas;

Focus Area IB: Strengthening the links between agriculture, food production and forestry and research and innovation, including for the purpose of improved environmental management and performance;

Focus Area IC: Fostering lifelong learning and vocational training in the agricultural and forestry sectors.

Priority 2: Enhancing farm viability and competitiveness of all types of agriculture in all regions and promoting innovative farm technologies and the sustainable management of forests, with a focus on the following areas:

Focus Area 2A: Improving the economic performance of all farms and facilitating farm restructuring and modernisation, notably with a view to increasing market participation and orientation as well as agricultural diversification;

Focus Area 2B: Facilitating the entry of adequately skilled farmers into the agricultural sector and, in particular, generational renewal.

Priority 3: Promoting food chain organisation, including processing and marketing of agricultural products, animal welfare and risk management in agriculture, with a focus on the following areas:

Focus Area 3A: Improving competitiveness of primary producers by better integrating them into the agri-food chain through quality schemes, adding value to agricultural products, promotion in local markets and short supply circuits, producer groups and organisations and inter-branch organisations;

Focus Area 3B: Supporting farm risk prevention and management.

Priority 4: Restoring, preserving and enhancing ecosystems related to agriculture and forestry, with a focus on the following areas:

Focus Area 4A: Restoring, preserving and enhancing biodiversity, including in Natura 2000 areas, and in areas facing

natural or other specific constraints, and high nature value farming, as well as the state of European landscapes;

Focus Area 4B: Improving water management, including fertiliser and pesticide management;

Focus Area 4C: Preventing soil erosion and improving soil management.

Priority 5: Promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy in agriculture, food and forestry sectors, with a focus on the following



areas:

Focus Area 5A: Increasing efficiency in water use by agriculture;

Focus Area 5B: Increasing efficiency in energy use in agriculture and food processing;

Focus Area 5C: Facilitating the supply and use of renewable sources of energy, of by-products, wastes and residues and of other non food raw material, for the purposes of the bio-economy;

Focus Area 5D: Reducing green house gas and ammonia emissions from agriculture;

Focus Area 5E: Fostering carbon conservation and sequestration in agri-culture and forestry;

Priority 6: Promoting social inclusion, poverty reduction and economic development in rural areas, with a focus on the following areas:

Focus Area 6A: Facilitating diversification, creation and development of small enterprises, as well as job creation;

Focus Area 6B: Fostering local development in rural areas;

Focus Area 6C: Enhancing the accessibility, use and quality of information and communication technologies (ICT) in rural areas.

- 5. The strategy for rural development in Malta has been based on a wide consultation with the rural stakeholders and the potential beneficiaries. It has identified five themes reflecting the RDP needs. The identified themes are:
 - Water, wastes and energy: improving sustainable use and generating renewable energy;
 - Maltese quality produce: improving quality, traceability, strategic marketing, adding value, branding and promotion;
 - Sustainable livestock: improving resource efficiency, competitiveness and productivity, and welfare;
 - Landscape and environment managing habitats and features; and
 - Wider rural economy and quality of life developing rural tourism, rural skills and promoting social inclusion.

The cross-cutting themes consist of:

- Environment;
- Climate change mitigation and adaptation; and
- Innovation.



- 6. A number of measures and sub-measures have been identified for implementation. The measures seek to fulfil the objectives of the various focus areas and ultimately priorities. Some measures are relevant under more than one focus area and/or priority because they contribute to reaching more than one objective.
- 7. **Table 2** presents a list of the measures and sub-measures. The measures are derived directly from the relevant articles in Regulation 1305/2013 these are also referenced in the table.

Table 2: Measures and Sub-Measures of draft RDP

EAFRD Reg Art No.	Measures & Sub-Measures
14	Knowledge Transfer and Information Actions
	1.1 - support for vocational training and skills acquisition actions
	1.2 - support for demonstration activities and information actions
	I.3 - support for short-term farm and forest management exchange as well as farm and forest visits
15	Advisory Service, farm management and farm relief services
	2.1 - support to help benefiting from the use of advisory services
	2.2 - support for the setting up of farm management, farm relief and farm advisory services as well as forestry advisory services
	2.3 - support for training of advisors
16	Quality schemes for agricultural products and foodstuffs
	3.1 - support for new participation in quality schemes
	3.2 - support for information and promotion activities implemented by groups of producers in the internal market
17	Investment in Physical Assets
	4.1 - support for investments in agricultural holdings
	4.2 - support for investments in processing/marketing and/or development of agricultural products
	4.3 - support for investments in infrastructure related to development, modernisation or adaptation of agriculture and forestry
	4.4 - support for non-productive investments linked to the achievement of agri-environment-climate objectives
19	Farm and business development
	6.1 - business start up aid for young farmers
	6.2 - business start up aid for non-agricultural activities in rural areas
25	Investments improving the resilience and environment value of forest ecosystems
28	Agri-environment-climate



EAFRD Reg Art No.	Measures & Sub-Measures
	10.1 - payment for agri-environment-climate commitments
	10.2 - support for conservation and sustainable use and development of
	genetic resources in agriculture
29	Organic Farming
	11.1 - payment to convert to organic farming practices and methods
	11.2 - payment to maintain organic farming practices and methods
31	Payments to areas facing natural or other specific constraints
	13.3 - compensation payment to other areas affected by specific constraints
35	Co-operation
	16.1 - support for the establishment and operation of operational groups of the EIP for agricultural productivity and sustainability
	16.2 - support for pilot projects and for the development of new
	products, practices, processes and technologies
	16.3 - co-operation among small operators in organising joint work
	processes and sharing facilities and resources, and for developing and
	marketing tourism
	16.4 - support for horizontal and vertical co-operation among supply chain actors for the establishment and development of short supply
	chains and local markets and for promotion activities in a local context
	relating to the development of short supply chains and local markets
	16.5 - support for joint action undertaken with a view to mitigating or
	adapting to climate change and for joint approaches to environmental
	projects and ongoing environmental practices
	16.6 - support for cooperation among supply chain actors for sustainable
	provision of biomass for use in food and energy production and
	industrial processes
	16.9 - support for diversification of farming activities into activities
	concerning health care, social integration, community-supported agriculture and education about the environment and food
	agriculture and education about the environment and lood
37	Risk Management
	LEADER local action groups/LEADER start-up kit/LEADER co-operation
42-44	activities
	19.1 - preparatory support
	19.2 - support for implementation of operations under the CLLD strategy
	19.3 - preparation and implementation of cooperation activities of the local action group
	19.4 – support for running costs and animation
	20.1 - Support for technical assistance (other than NRN)
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EAFRD Reg Art No.	Measures & Sub-Measures	
	20.2 – support for establishing and operating the NRN	

STRATEGIC ENVIRONMENTAL ASSESSMENT FRAMEWORK

- 8. The objective of the SEA Directive is to provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. It is the process of evaluating the environmental impacts of any proposed plan/programme likely to have significant effects on the environment. The SEA process helps to inform the decision making process with the aim of improving the final plan or programme and promoting sustainable development. In addition, the SEA process aims to increase public involvement in decision making at a strategic level, with consultation at various stages in the SEA process being a requirement of the Regulations.
- 9. The five main steps required as part of the SEA process are summarised in **Table 3** below.

Table 3: Key stages in the SEA process

Stage in SEA Process	Details of Process Required
Screening	Screening is required to determine whether the proposed plan/programme is likely to have significant environmental effects and whether an SEA is required.
Scoping	Scoping enables the coverage and level of detail of the Environmental Report to be determined
Environmental	The Environmental Report details the anticipated environmental impacts of the
Report	programme and any proposed amendments to the plan to mitigate its effects. It must be consulted upon.
Adoption	The Adoption report details the results of consultation; how comments have been incorporated into the programme; the final programme; and the proposals for monitoring the environmental impacts of the programme.
Monitoring	The Monitoring stage is undertaken during implementation of the programme and serves to identify the level of monitoring required and, should adverse impacts be identified, any remediation proposals.

10. A Scoping Report was prepared by Adi Associates to describe the methodology for the SEA together with an analysis of key policies, plans and programmes that the RDP should consider. Consultation on the draft Scoping Report was undertaken with a number of identified stakeholders including the SEA Focal Point, the Malta Environment and Planning Authority, the Malta Resources Authority, the Department of Agriculture, the Department of Fisheries, and the Environmental Health



- Directorate. Consultation with the general public was undertaken during June 2014 when the Scoping Report was made available through the Ministry's website.
- II. The Scoping Report, including the response to comments received during public consultation, is reproduced in **Appendix I** of the Environment Report.
- 12. This Environment Report takes into account the comments received during the public consultation on the Environment Report. The public consultation comments are included in Appendix 2 of this report.

Assessment Methodology

13. Although the SEA Directive does not specifically require the use of objectives or indicators in SEA, they are a recognised way through which environmental effects can be described, analysed, and compared. SEA objectives encompass the relevant national and EU environmental priorities that can be inferred from a number of relevant national documents as outlined below (in the absence of a national environmental strategy). The RDP is assessed in light of the SEA objectives. The RDP's performance against the SEA objectives is generally measured by indicators. The SEA objectives are distinctly different from the RDP's objectives, though the two influence each other, and they may overlap. To fulfil the requirements of the SEA Directive and the SEA Regulations 2010, the SEA objectives must cover: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage; and landscape, as well as the interrelationships between them where these are relevant to the sector being addressed by the plan or programme. Those objectives relevant to the Strategy are described in **Table 4**.

SEA objectives & indicators

- 14. **Table 4** defines the set of objectives relating to environmental issues, in support of which, relevant assessment criteria and possible data sources have also been identified.
- 15. The SEA indicators are measurements of trends over time. Changes in the indicators show whether the implementation of the RDP would be, or has been, successful in improving the environment. It is to be noted however, that changes in the indicators could be the result of factors outside the influence of the Strategy.



Table 4: SEA Environmental Objectives & Indicators for Assessing Impacts

Issue	SEA Objective	Criteria	SEA Indicator	Data source
Biodiversity, Flora & Fauna	To maintain biodiversity (including terrestrial and marine) To avoid negative effects on protected habitats and species To avoid introduction of non-indigenous species into the natural environment To ensure that populations of native species are within safe biological limits To retain connectivity and avoid habitat fragmentation	 Affect the integrity of designated areas? Affect protected species and habitats? Affect take up of land which supports a natural environment? Affect the introduction of nonindigenous species into the natural environment? Affect the creation / maintenance of natural corridors and stepping stones? 	 Conservation status of habitats and species Records of non-indigenous species in the natural environment that may have been introduced as a result of agriculture activities Number of projects specifically targeted for the conservation and management of natural assets/protected natural sites 	Environmental monitoring through Environmental Impact Assessment (EIA), Appropriate Assessment (AA), or other regulatory requirements as relevant. Malta Environment and Planning Authority (MEPA) Natura 2000 site managers
Human health and Population	To ensure agricultural/livestock products are within the legal safety requirements (pesticides and diseases) for human consumption To ensure ground water quality does not deteriorate as a result of agricultural activity To reduce noise, dust, odour, and light	 Affect the safe consumption of agricultural/livestock products? Affect ground water quality? Affect dust generation from construction and waste handling activities? Affect noise from construction, traffic and livestock farms? Affect light pollution from development? Affect odour generation? Affect the provision of access to the countryside and outdoor 	 Ground water quality results Area under organic farming Number of projects providing public open space / recreation activities 	Malta Competition and Consumer Affairs Authority (MCCAA) MEPA National Statistics Office (NSO) Department of Agriculture Ministry for Sustainable Development, Environment and Climate Change Ministry for Gozo



Issue	SEA Objective	Criteria How will this measure	SEA Indicator	Data source
	 pollution To protect and improve the health and wellbeing of the population 	 recreation activities? Affect access to fresh, quality and nutritious food? Affect access to locally sourced food? 		
Water	To meet the standards required by the Water Framework Directive To minimise pollution on groundwater from activities directly arising from the agricultural sector To improve drinking water quality and supply To avoid deterioration of water bodies Contributes to development of nonconventional water resources	 Affect drinking water quality while meeting demand? Affect the existing supply infrastructure? Affect the ecological status of inland surface waters? Affect water efficiency within the sector? Affect management of water resources? 	 Groundwater quality over time. Chemical analysis Area (ha) concerned by investments for saving water (e.g. more efficient irrigation systems) Quality of freshwater bodies Proportion of water abstraction by use Distribution of nitrate concentration Location of project with respect to the groundwater safeguard zone 	Malta Resources Authority / WSC
Emissions to air	To ensure odours and other are minimised	Affect odour and other emissions?	 Number of complaints related to odour from agricultural/livestock operations Emission trends of key pollutants over time from the sector 	MEPA, MSDEC
Climatic factors and climate change	To contribute to climate change adaptation and/or mitigation	Affect climate change (considering in particular mitigation, adaptation, renewable energy and GHGs?	 GHG emission trends over time Use of renewable energy over time Total investment in renewable energy production (projects funded 	MEH, MRA



Issue	SEA Objective	Criteria	SEA Indicator	Data source
		How will this measure		
	 To increase reliance on renewable energy resources To reduce GHG emissions 		by the RDP) • % of agricultural and forest land under management to foster carbon sequestration/conservation • % of Land Units concerned by investments in livestock management in view of reducing GHG and/or ammonia emissions • % of agricultural land under management contracts targeting reduction of GHG and/or ammonia emissions • % of agricultural and forest land under management to foster carbon sequestration/conservation	
Soil	 To prevent soil erosion To prevent soil sealing To prevent soil contamination 	Affect soil quantity and quality?	Number of projects implemented through the RDP that include soil conservation	Environmental Impact Assessment, Environmental monitoring as part of permit
Material assets	 To ensure efficient water management within the sector To ensure sustainable waste management within the sector 	 Affect sustainable water management practices? Affect sustainable waste management practices? 	 Water consumption by the sector over time Number of water management projects funded by the RDP Number of waste management projects funded by the RDP 	MRA, WasteServ, Department of Agriculture, MSDEC
Cultural heritage	To maintain the conservation status of cultural heritage sites / areas with known	Affect cultural heritage including archaeological heritage?	Number of projects targeting the restoration of cultural heritage features and improvement of the cultural landscape	MEPA Heritage Malta Superintendent of Cultural heritage



Issue	SEA Objective	Criteria How will this measure	SEA Indicator	Data source
	cultural / archaeological			
	remains			
Landscape	To maintain landscape	Affect landscape quality	Environmental Impact Assessment	MEPA
	quality distinctiveness	distinctiveness?	results on landscape assessment	
			 Number permitted projects located 	
			in Areas of High Landscape Value.	



Assessing significance

- 16. Significance is assessed in accordance with the criteria listed in Schedule 2 of the SEA Regulations, 2010. It is already well established in Environmental Impact Assessment (EIA) literature whereby significance is a function of impact magnitude and the sensitivity of receptors. Significance may be determined in a number of ways, including expert judgement, the use of thresholds, reference to legislation, and consultation with stakeholders. Although this SEA draws on each of these methods, expert judgement and consultation predominate.
- 17. The assessment of significance is based on the probability of the impact occurring, on the scale of the impact, its duration, reversibility, whether it has transboundary effects, and the certainty of impact prediction.

ASSESSMENT OF ALTERNATIVES

- 18. When considering alternatives, it is noted that the regulations governing European Funding Programmes prescribe certain requirements to be abided by in drawing up the RDP. In addition, the RDP must take account of country-specific recommendations, Europe 2020 targets, and national priorities. At the same time, the Regulation provides some flexibility in allowing Member States to select investment priorities. Based on the above three alternatives were selected:
 - Option I: Baseline Scenario (Do-Nothing Option): The do nothing option focuses on the scenario where the RDP is absent. Even though alternative funding might be found, the agricultural sector is deemed to decrease in terms of utilised agricultural land, employment and also income and productino.
 - Option 2: Competitiveness, marketing and productivity-focused RDP: This
 option reflects the development of a RDP with a focus largely on increased
 competitiveness, marketing and productivity with minimal investment in
 environmental measures and capacity building.
 - Option 3: Current Draft RDP: This option allocates approximately 63%¹ of the total contribution from the RDP on climate change mitigation and adaptation and other environmental issues. In addition, based on lessons learned from the 2007-2013 RDP, the 2014-2020 draft RDP also contributes a significant portion of the budget (approximately a third) towards capacity-building and cooperation in the sector.
- 19. To summarise the alternatives assessment, in terms of environment benefits, Option 2

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¹ Estimate provided by the Managing Authority EAFRD (e-mail dated 24th June 2014).



(Competitiveness, marketing and productivity-focused RDP) and Option 3 (Current Draft RDP) present the more favourable alternatives to Option I (Baseline Scenario/Do-Nothing Option). Most of the environmental benefits that can be expected from Option I are solely due to a reduction in the economic activity associated with agriculture.

- 20. From an environmental point of view, Option 3 (Current Draft RDP) will likely result in more enhanced and significant positive environmental impacts. This Option apportions over half the budget (c.63%) to investment in climate change adaptation and mitigation as well as other environmental issues. This significant investment is expected to increase the significance of potential environmental benefits across all the SEA objectives. It also apportions approximately a third of the budget towards training and cooperation. Option 3 attempts to address problems like insufficiency to maximise benefits from such investment and low level of ongoing technical, agronomic and business management and development advice available to farmers and rural businesses. It is anticipated that investing in capacity-building together with better cooperation amongst farmers will improve the efficiency and sustainability of the sector when compared to, for instance, Option 2, which can be considered to be of similar ethos to the 2007-2013 RDP in that it promoted investment in improving productivity without focussing sufficiently on human resources and capacity.
- 21. Option 3 i.e. the draft RDP (2014-2020) is the preferred option in terms of significance of environmental benefits that can be expected to be accrued whilst simultaneously investing in sustainable development of the sector.

IMPACT ASSESSMENT

- 22. The impact assessment described in Chapter 7 of the Environmental Report concludes that the RDP will result in direct environmental benefits through the implementation of Articles 14, 15, 17, 25, 28, 29, 31, 35 and 42-44. It is further noted, as stated in **Chapter 6** that the RDP will contribute approximately 63% of its budget to climate change and the environment. This estimate is based on calculations undertaken by the Managing Authority.
- 23. The themes of water, waste and energy feature in a number of the RDP measures as do biodiversity and landscape. The agri-environmental measures, Areas with Natural Constraints, the forest ecosystems, and the physical investments measures all contribute towards attainment of environmental goals. Management of the implementation of measures will be an important factor in ensuring that potential positive environmental impacts identified do in fact ensue and are maximised.
- 24. A strong element of the RDP is the emphasis on training. The SEA considers that indirect benefits to the environment will accrue if the training is successful in providing farmers and other rural actors with the knowledge and skills to understand the



important link between the environment and agriculture and to improve the efficiency of their operations. With respect to Article I5 and the provision of advisory services, it must be ensured that appropriate advisors with the appropriate capacity in both issues related to agricultural production and environmental management are recruited.

- 25. Cooperation is also considered to be an important aspect of the RDP that has the potential to result in significant environmental benefits as well as benefits for the sector and ensuring its sustainability. Given the difficulties associated with this element of the RDP in the past, facilitation for successful implementation from the programme proponent and other relevant stakeholders will be fundamental to ensure a successful result. Similarly, potential impacts from LEADER are largely unknown at this stage as these would depend on the projects to be funded and the Local Development Strategies that will be developed through LEADER.
- 26. The assessment also identified that although a number of environmental benefits are associated with the investment in organic farming, it was concluded that the RDP does not allocate sufficient budget to this measure (and related measures) to ensure any significant potential environmental benefits. The RDP provides an explanation for this related mainly to the perceived difficulty of moving towards organic farming for local farmers. Whilst this is acknowledged, the SEA encourages the programme proponent to consider ways in which the RDP can facilitate and further encourage farmers to move towards organic farming in the long term.
- 27. In terms of potential negative impacts from the proposed measures within the different articles, some impacts could occur when new infrastructure or development is located in environmentally sensitive areas. This is particularly relevant in the measures targeted under Article 17, for start-ups (article 19) and potentially the cooperation projects and the projects emanating from articles 42 to 44 (LEADER). It is also important that projects selected are in line with other policies and policy requirements.
- 28. In terms of climate change mitigation and adaptation, the RDP contemplates a number of initiatives such as the laying of a new pipeline to enable the distribution of treated sewage effluent to farmers, as well as measures related to water capture and improved water quality thus contributing to a reduction in pressure on the groundwater resource from this sector. Lowering GHG emissions is targeted through renewable energy schemes such as biogas generation, composting as well as solar energy. Climate change adaptation is also addressed through reference to the review of water management and storage techniques. According to the ex-ante evaluation, joint actions for climate change and cooperation for biomass activities are expected to reduce inputs of soil nutrients, water and energy. The €7.6m investment is estimated to lead to an 8% drop in cost of water and a 1% overall drop in bought inputs.



CUMULATIVE & SYNERGISTIC IMPACTS

- 29. Cumulative effects are those effects that result from incremental changes caused by other past, present, or reasonably foreseeable, actions together with the proposal. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.
- 30. Synergistic effects interact to produce a total effect that is greater than the sum of the individual effects.
- **Table 5** provides a general overview of the key issues identified for each environmental topic considered within the assessment process.

Table 5: Summary of cumulative environmental effects of the RDP

Environmental Receptor	Key impacts of the Draft RDP
Biodiversity, Flora and Fauna	Impacts on biodiversity, flora and fauna, as discussed above are largely expected to be positive because of the different contributions and interactions of the various articles and sub-measures. Of particular relevance to the achievement of positive impacts are the measures associated with training and advisory services (Articles 14 and 15) that will enable the farmer or operator to understand the link between agriculture and the environment and the importance of environmental sustainability. Direct impacts are expected from the implementation of a number of articles including investment in physical assets (article 17), investment in forestry (article 25), agri-environment measures (article 28), organic farming (article 29), payments to areas with natural constraints (article 31), cooperation projects (article 35) and potentially through the implementation of projects under LEADER (articles 42-44). As described in Table 7.2 some measures can be improved for enhanced benefits but overall the impact remains positive. In terms of potential negative impacts, attention must be given to habitats and species when projects are proposed in rural areas. Start-ups (under article 19) could negatively affect biodiversity, on a localised scale.
Human health	The RDP is beneficial in terms of human health through measures that will improve quality of production such as funding for quality schemes (article 16) and organic farming (article 29) (although the latter are likely to be insignificant for this programming period). Indirectly, an improvement in the environmental performance of the sector will also benefit human health. Investment in projects that increase access to the countryside (including the setting up of trails, walks, etc) will result in beneficial effects on health and well-being.
Water	The envisaged cooperation projects under water and the emphasis of improved water management across the RDP, coupled with a strong emphasis on educating farmers should result in cumulative positive impacts on water resources.
Emissions to air	Emissions are targeted mainly through the provision of measures to encourage energy efficiency, carbon sequestration and renewable energy. Training and advisory measures are also likely to further enhance the benefits in this area.
Climatic factors and	With a strong proportion of the RDP budget aimed at climate change and the environment



Environmental Receptor	Key impacts of the Draft RDP
climate change	(approximately 63%), impacts on climate change are expected to be positive. Although the emphasis is on climate change mitigation, there are various measures that address adaptation including the water harvesting and water management actions.
Soil	The impact on soils is generally positive as a result of a number of measures that address training, tree planting, agri-environment measures, organic farming and potential cooperation projects.
Material assets	The impact on material assets is considered positive from the proposed improvement in water management and investment in waste management.
Cultural heritage	Cultural heritage impacts are positive mainly through initiatives aimed at restoring rubble walls and other rural structures. Major negative impacts on cultural heritage are not anticipated, however, this would depend on the type of projects that would be proposed and funded.
Landscape	Landscape is one of the environmental parameters that is given priority in the RDP. Landscape partnerships are envisaged and the various measures to sustain the agricultural sector will contribute towards maintaining landscape quality. Restoration of rubble walls will also address landscape issues.

MITIGATION & RECOMMENDATIONS

32. Potential mitigation measures for each of the Articles (and relevant sub-measures) are described in Chapter 7 of the Environmental Report. These mitigation measures are discussed below.

Training and capacity building

33. The RDP places great emphasis on training and education for the proper implementation of the goals of the RDP. For environmental benefits to be really enhanced in the 2014-2020 programming period and for longer term benefits, training must be relevant to the needs of farmers and operators as well as educating them on the importance of environmental sustainability. Important areas highlighted in the RDP are climate change, water and waste management and energy. Other important sectors considered in the SEA are biodiversity, landscape and the promotion of organic farming. Climate change adaptation, in addition to mitigation, should also be emphasized. The provision of adequate advisory services is also important so that these environmental goals are achieved.

Cooperation projects

34. Important projects under the RDP are linked to the formation of partnerships with multiple stakeholders. Experience with past programmes has shown, as also acknowledged in the RDP itself, that cooperation projects are a challenge for Malta. In



order for such projects to be successful it is important that the Managing Authority is actively involved in promoting such projects and providing the necessary support to assist in the implementation of these important projects.

Selection of projects during implementation

35. One of the recommendations emerging from the SEA is the need to ensure that, during project selection, proposals / initiatives that address a number of environmental concerns should be given priority over those that do not. Environmental requirements during project selection should be allocated enough weighting to ensure that project proponents actively pursue environmental requirements.

Siting of new infrastructure

36. Certain interventions in the RDP may require the construction of new facilities / infrastructure. As a general recommendation, the reuse of existing buildings and the development within existing built-up areas is preferred to the uptake of new land. When considering the criteria for the selection process, priority should be given to projects that seek to use/re-use already existing buildings and structures over those that require new development. The SEA points out that certain projects may require an EIA, or an Appropriate Assessment, in the case of impacts on Natura 2000 sites. The SEA also recommends that regular consultation with the Environment Protection Directorate (EPD) within MEPA should be carried out and an EPD representative should be present on the Project Selection Committee.

Specific recommendations

- 37. With regards to the sub-measures under Article 25, specific recommendations are made with regards to the sub-measure related to the removal (felling) of trees, thinning, etc. It is recommended that such an action is not restricted to cutting down the tree as uprooting trees is often necessary particularly with alien and invasive species. Preference should also be given to projects that use local genetic material. Funding should also be targeted towards planting of indigenous species. The removal of alien species should be carried out in accordance with MEPA's guidelines for the removal of alien species (MEPA, 2011, Guidelines on managing non-native plant invaders and restoring native plant communities in terrestrial settings in the Maltese Islands Final Draft for Consultation).
- 38. It is also important to ensure that those sites identified for new woodland areas do not host Annex I habitats (Habitats Directive) or other habitats of conservation importance (as has occurred in the past) whereby they be lost as a result of the afforestation. An Appropriate Assessment or other suitable ecological assessment may be required prior to the designation of an area for afforestation.
- 39. With regards to the implementation of the agri-environment measures under Article 28 and the sub-measure to prune *Arundo donax* it is recommended that the measure should



- include support to plant cuttings or saplings of rare watercourse species along the watercourse following harvesting of the Giant Reed. The choice of trees should include the following, which are all rare and endangered, some of them critically: Salix alba, Salix pedicellata, Sambucus nigra, Ulmus canescens, Fraxinus angustifolia; and Populus alba.
- 40. With regard to the autochthonous Maltese species, in addition to the three species it is recommended that the measure should be extended to the following critically endangered species: Ulmus canescens, Rhus coriaria, Salix alba, Salix pedicellata; and Tulipa sylvestris. These species are all critically endangered, being found in only one or two locations in Malta, in each case on agricultural land.
- 41. The RDP makes a case that 'organic farming is extremely difficult to achieve on Malta' and therefore allocates a relatively small budget to this measure. While it is acknowledged that there are difficulties, the RDP should adopt a more positive approach and actively encourage and facilitate organic farming through the various measures (including through Article 14 as noted in the RDP itself).
- 42. The Local Development Strategy (LDS) that is supported by the RDP under LEADER should clearly support national environmental objectives and demonstrate how the selected projects are in line with strategic documents on the conservation of biodiversity in line with the National Biodiversity Strategy and Action Plan.

MONITORING

- **Table 6** summarises the proposed monitoring plan of potential negative impacts identified in the assessment.
- 44. Although positive impacts are expected from the RDP, it is recommended that these impacts are also monitored. **Table 6** proposes a monitoring plan for such impacts.

Table 6: Monitoring Plan

SEA Theme	Potential cumulative significant effects	Relevant Indicators (from Table 5.1)
Biodiversity, Flora and Fauna	Impacts on biodiversity, flora and fauna, as discussed in Table 7.2 are largely expected to be positive because of the different contributions and interactions of the various articles and submeasures. Of particular relevance to the achievement of positive impacts are the measures associated with training and advisory services (Articles 14 and 15) that will enable the farmer or operator to understand the link between agriculture and the	 Conservation status of habitats and species Number of projects specifically targeted for the conservation and management of natural assets/protected natural sites



SEA Theme	Potential cumulative significant effects	Relevant Indicators (from Table 5.1)
	environment and the importance of environmental sustainability. Direct impacts are expected from the implementation of a number of articles including investment in physical assets (article 17), investment in forestry (article 25), agri-environment measures (article 28), organic farming (article 29), payments to areas with natural constraints (article 31), cooperation projects (article 35) and potentially through the implementation of projects under LEADER (articles 42-44). As described in Table 7.2 some measures can be improved for enhanced benefits but overall the impact remains positive. In terms of potential negative attention must be given to habitats and species when projects are proposed in rural areas. Start-ups (under article 19) could negatively affect biodiversity, on a localised scale.	
Human health	The RDP is beneficial in terms of human health through measures that will improve quality of production such as funding for quality schemes (article 16) and organic farming (article 29). Indirectly, an improvement in the environmental performance of the sector will also benefit human health.	 Ground water quality results Area under organic farming Number of projects providing public open space / recreation activities
Emissions	Emissions are targeted mainly through the provision of measures to encourage energy efficiency, carbon sequestration and renewable energy. Training and advisory measures are also likely to further enhance the benefits in this area.	Number of complaints related to odour from agricultural/livestock operations Emission trends of key pollutants over time from the sector
Climate change	With a strong proportion of the RDP budget aimed at climate change and environment (approximately 63%), impacts on climate change are expected to be positive. Although the emphasis is on climate change	 GHG emission trends over time Use of renewable energy in the sector over time Total investment in renewable energy production (projects funded by the RDP)



SEA Theme	Potential cumulative significant effects	Relevant Indicators (from Table 5.1)
	mitigation, there are various measures that address adaptation including the water harvesting and water management actions.	 % of agricultural and forest land under management to foster carbon sequestration/conservation % of Land Units concerned by investments in livestock management in view of reducing GHG and/or ammonia emissions % of agricultural land under management contracts targeting reduction of GHG and/or ammonia emissions % of agricultural and forest land under management to foster carbon sequestration/conservation
Water	The envisaged cooperation projects under water and the emphasis of improved water management across the RDP, coupled with a strong emphasis on educating farmers should result in cumulative positive impacts on water resources.	 Groundwater quality over time. Area (ha) concerned by investments for saving water (e.g. more efficient irrigation systems) Quality of freshwater bodies Proportion of water abstraction by use Distribution of nitrate concentration Location of project with respect to the groundwater safeguard zone
Soil	The impact on soils is generally positive as a result of a number of measures that address training, tree planting, agri-environment measures, organic farming and potential cooperation projects.	Number of projects implemented through the RDP that include soil conservation
Material Assets	The impact on material assets is considered positive from the proposed improvement in water management and investment in waste management.	 Water consumption by the sector over time Number of water management projects by the RDP Number of waste management projects funded by the RDP



SEA Theme	Potential cumulative significant effects	Relevant Indicators (from Table 5.1)
Cultural heritage	Cultural heritage impacts are slightly positive mainly through initiatives aimed at restoring rubble walls and other rural structures. Major negative impacts on cultural heritage are not anticipated, but these would depend on the type of projects that would be proposed and funded.	Number of projects targeting the restoration of cultural heritage features and improvement of the cultural landscape
Landscape	Landscape is one of the environmental parameters that is given priority in the RDP. Landscape partnerships are envisaged and the various measures to sustain the agricultural sector will contribute towards maintaining landscape quality. Restoration of rubble walls will also address landscape issues.	 Environmental Impact Assessment results on landscape assessment Number permitted projects located in Areas of High Landscape Value.

NEXT STEPS

45. Following consultation on the SEA and the draft RDP, changes were be made to both the SEA and the draft RDP. Although following the SEA process the RDP was revised, the measures were essentially maintained the same, so no revision of the Environment Report was necessary.