

26 January 2023

Sustainable Development Directorate  
Ministry for the Environment, Energy and Enterprise  
6, Qormi Road, Santa Venera

Director,

**Repubblika's response to the draft of Malta's Sustainable Development Strategy for 2050**

Thank you for the opportunity to comment on your document.

We share your view that any plan for our country's future must not merely be economically viable, as indeed it must, but it must also leave no one behind, and it must allow future generations to enjoy our country and our planet in an environment that is at least as healthy as it was when we inherited it from our forebears.

We do not share your view that your strategy meets sustainability goals. It does not provide us with the confidence that our country has a plan for 2050.

We are also particularly concerned that the country has still no visibility of an action plan to implement the UN's Sustainable Development Goals for which Malta signed up in 2015. Here we are 8 years later debating at a very high and superficial level principles that this country had long committed to. This response will attempt to demonstrate why the idea that we are at a stage of having a strategy is disproved by all the contradictions and the inconsistencies in the draft document you published.

To begin with, any 'sustainable development strategy' must be in and of itself a 'development strategy'. Your document is hopelessly vague in spelling out the economic vision and the strategy to secure it, that you may have for this country. Although we appreciate the intent of the adjectives "green" and "blue" these remain adjectives. How will people living in Malta be making money in 2030, 2040, and 2050? What will the economic profile of the country be? What are the tax revenue prospects of these economic models?

These questions need answers because you require them to be able to give us answers to two even more important questions.

Firstly, what will be the net ecological impact of the economic activities that will be creating wealth in Malta over the next 27 years?

And secondly, and no less importantly, what will be the cost of the public initiatives hinted at in your strategy and how will this cost be met?

We would refer to another consideration that we would have thought fundamental to even attempt to strategize for the next 27 years, and which appears to be missing altogether in your document.

Since 2014 Malta's population grew at a rate greater than 2% per annum, a growth rate never seen in modern times. Clearly the human impact on our environment is in some way proportionate to the size of the human population and any attempt to neutralise human impact must be multiplied by any expected growth in population. What are your department's demographic assumptions for 2030, 2040, and 2050?

We put these questions because Minister Miriam Dalli claims in this report that "it is crucial that every sector and actor is actively involved throughout the entire process." To sell us your plan you need to be entirely transparent about your workings and assumptions as, clearly, we need to be aware of those if we are to judge your plan achievable in the real world.

There is much in your report that forces us to doubt your plan is realisable. Let us begin with some glaring contradictions.

You claim to want to make the tourism industry "more sustainable" (page 18), and yet you propose "to attract more tourists" (page 33). The unspecified incremental number is just in the unsustainable style of outdated development plans that considered growth as an inexhaustible value in and of itself. We would have expected that rather than "more", the strategy would plan for a changing tourism industry that relies less on numbers and more on value, particularly a contributory value to the environmental and social well-being of the country.

Similarly, you claim as a general principle that you have the goal of "reducing GHG emissions" (page 48) all while "encouraging stronger air connectivity" (page 45) which we take to mean that you are planning for more flights in and out of Malta. Whilst, like anyone else, we appreciate the need for air travel connections to and from an island country we are asked by your document to expect and work for an economic and social change that has a net zero impact on the ecology. More flights are not how that will be achieved.

The reference to GHGs in a document published on 20th January is especially ironic when by the 25th January, all of 5 days later, the government announced speculative exploration to extract fossil fuels from our waters. The intentions you declare in your draft strategy to reduce our contribution to the planet's carbonisation cannot be taken seriously when you actively seek to profit from what you hope will be the most harmful contribution to the environment this country has so far managed to make.

Also, similarly, you claim you intend to "further invest in greening our buildings" (page 35) and yet you propose to start assessing "projects that have the potential of generating large amounts of construction and demolition waste" (page 21), a perhaps unintended declaration of an intent to change nothing about the aggressive and unsustainable practices of the construction sector.

The contradictions in the text betray the irrepressible multiple personalities of an incohesive government, unable to suppress political ambitions that are inconsistent with the overall objective of transforming Malta into an inclusive, sustainable country.

Also consider the gulf between some of the dreamlike aspirations declared in the document and the existing reality overseen by the administration that has published this document. An obvious reference to the national experience of the construction industry is inevitable because if the country is to even aspire to claim to be sustainable, the current expectations of the construction industry need to be radically diverted.

Your report promises “enhanced regulatory frameworks, permitting processes and enforcement mechanisms ... to mitigate noise, dust and light emissions from industrial and construction activities” (page 35). Forgive our scepticism but if your claim is to be credible, we would need to understand much more of how you plan to behave differently than you heretofore have in this respect.

The credibility gulf yawns especially wide in the annex to your report where you set targets for 2030. To properly assess these targets, we would need to see your assumptions and your workings and subject your plans to public scrutiny, particularly measuring against interim milestones for corrective measures when needed along the way.

We will refer to three examples from the targets set by the Ministry of Transport which at face value look particularly dramatic. You propose to “reduce modal share of car drivers to 41% compared to 1990” (page 68). National Household Travel Surveys found that car drivers made 41.3% of trips in 1989, 56.4% of trips in 1998, 59.4% in 2010, and over 84% in 2021. We are understanding the target in your document to mean that you intend to take the modal share of car drivers down to 41% of all trips by 2030, to reverse within 7 years a deteriorating trend aggravated over the past 33 years.

Achieving this target would have a considerable positive impact on our country, but to believe there is any chance it may be achieved we would need to be seeing now dramatically perceptible improvements such as reduced car journey times, and reduced road congestions. At least anecdotally this is not happening. Not at all. You will need to conduct and publish frequent Household Travel Surveys between now and 2030 to show that you are in any way en route to achieving that target.

We are less sceptical, for example, about your target to exceed 50 million bus boarding numbers by 2030 (page 69) but we worry that this target is not achieved because of some healthy improvement in the sustainability of our country or a marked improvement in the provision of public transport but rather because of a growth in Malta’s population and tourist numbers, and an increase in social exclusion and poverty.

Also consider the target of introducing “around 65,000 electric vehicles” (page 69) by 2030. The ambitious target requires an infrastructural overhaul to accommodate the objective, which must commence practically immediately if it must secure the targeted impact in the projected time frame. We are not aware that any such program is underway or even planned.

The 2030 targets are conveniently placed beyond the horizon of the next general election. No sustainable development strategy is useful if it rests on targets thrown like letters to Father Christmas without any concern for the consequences – political, not to mention economic, social, and environmental – of failing to realise them. Consider that the strategy itself claims to spell out a realisable vision for 2050, well beyond the retirement of any politicians promising to deliver it. Once again forgive us our scepticism.

Also consider some of the political considerations made in the strategy document. You set as a strategic objective the empowerment of citizens with no regard to the significant erosion in democratic standards that your government has overseen over the past 10 years. These include excusing corruption at the highest level of government, engaging in environmentally harmful contracts justified by that corruption, reducing the public’s access to the Commission for Administration of Justice, reducing the independence of the Commissioner for Standards in Public

Life, failing to implement the recommendations of an independent inquiry your government appointed after the killing of Daphne Caruana Galizia, reducing suffrage in local elections, and several other examples that amount to the opposite of empowerment “of all citizens to make their voices heard” (page 60).

Most comically you set as a strategic objective to “ensure a timely and effective justice system” (page 59) where the consensus among people who touch the justice system whether as professionals, as administrators, as practitioners, as victims, or as clients is that we are experiencing a worrying deterioration.

One final comment about the lack of cohesion in the document is about the language you use when referring to migrants. You describe Malta as “vulnerable to arrivals of irregular migrants and asylum seekers” (page 59) as if we are victims of some invasion. Indeed, it remains your strategy “to ensure the expeditious determination of asylum claims and swift repatriation” (page 60) despite multiple European Court of Human Rights decisions that this strategy is in breach of the same human rights on which, in the same page of the report, you propose to raise public awareness.

In another section of your report, you speak of “successful migration and integration policies and programmes that will allow migrants to actively participate in society while contributing to our economy” (page 36). The spirit of your objective to include migrants in society and to expeditiously determine whether they can stay here at all is, at best, inconsistent.

We are not aware of any significant discussion on, let alone a clear vision for, the recognition as citizens of this country with no qualification or discrimination of people who have made Malta their home, or people born here to immigrant parents who call no other place in the world as their home. As far as we can tell, the best current policy can say about immigrants is that they can be used as resources for the enrichment of people who describe themselves as Maltese. We see no evidence of policy that is concerned with the aspirations, not to mention the political, social, and economic rights of residents of this country born elsewhere or born to parents born elsewhere.

It seems therefore that you are seeking to please those of us who argue that all people in Malta should enjoy their democratic rights including their right to participate fully in the democratic process and people for whom migrants only have a place on planes deporting them.

People who are today unable to “actively participate in society” should not be made to wait till 2050 to have their fundamental rights respected.

As we see it, a Sustainable Development Strategy for 2050 ought to be in effect a national plan for our economy but also for the governance of the country from measures ranging from education to social inclusion, to health, to environmental conservation. Your document suggests that you aspire to see this Strategy as indeed having that all-encompassing effect.

And yet the strategy does not appear to have the public ownership of the highest level of the government, in any case of ministers outside your ministry.

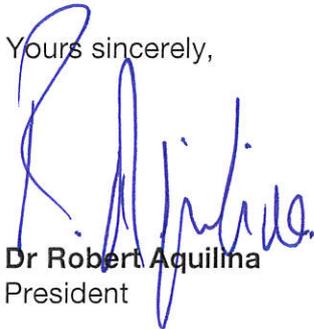
We applaud your desire to seek the commitment of civil society and the community at large to your vision, such as it is, but we fail to understand your hope to achieve this in any meaningful way while you appear not to have the public commitment of the prime minister and his ministers to this programme.

As you no doubt are aware, the first time we have had sight of your draft Strategy was at the moment that the consultation meeting of the 20th January of this year started. We look forward to seeing the revised version of the Strategy after you consider our and the public's reactions to your call for responses.

We also refer to your commitment to publish for public consultation the list of actions that would implement the final version of this strategy. Given the short time frame and the current state of play from which we are to seek the turnaround we need to become a net zero community, agreeing on an Action Plan must be as transparent, inclusive, carefully and fully budgeted, and backed by science, as it must be urgent.

We assure you of our constructive participation in this which ought to be a national effort.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'R. Aquilina', is written over the typed name and title.

**Dr Robert Aquilina**  
President