



# National Strategy for the Environment 2050

Feedback by The Malta Chamber of  
Commerce, Enterprise & Industry





## Overview

The National Strategy for the Environment (NSE) 2050 is welcome even if it is long overdue.

The Malta Chamber of Commerce, Enterprise and Industry (The Malta Chamber) affirms the need to **move from vision to action with clearly mapped timelines**. The Malta Chamber therefore urges haste in **outlining the KPIs and a tangible action plan** to implement the NSE given that in the interim, Malta's environment remains under pressure, with implications on the national economy and its long-term impact on quality and well-being.

Policy coherence between the various initiatives and strategies, such as the Low Carbon Development Strategy and the Long-Term Renovation Strategy, needs to be ensured. Recognising that this is the intention of the NSE, The Malta Chamber acknowledges the Ministry's intention to pass the NSE through Parliament and secure a high-level legislative dimension, guaranteeing that the report would translate into strategic implementable action for future legislatures. **It is vital for Malta to embrace a strategy which goes beyond a piecemeal legislature-long policy plan**. The Malta Chamber believes that, following the necessary debates and possible amendments, Parliament should aim to reach unanimity as this is the only way that one can **secure a commitment on future Governments**.

Due emphasis should be attributed to **urban planning and its impact on Malta's attractiveness and citizen's wellbeing**. It is encouraging to note that in the Budget 2023 speech the Minister of Finance and Employment announced the establishment of a Board for the assessment of quality and aesthetics features of new developments. We look forward for a swift implementation of this policy to enhance the country's attractiveness. Also, the investment in energy renewables should help address empirical findings<sup>1</sup> which state that on average, in Malta, more than 500 people die prematurely every year due to air pollution.

In this report, **The Malta Chamber has gone beyond its call of duty to just providing feedback on the NSE document**. We have taken a proactive role by outlining several recommendations which contribute to a concrete action plan. Industry insights shared by The Malta Chamber reflect a wide-ranging consultation with industries and businesses hailing from different sectors, which involved engagement with its 3 Economic Groups: (a) Importers, Distributors and Retailers, (b) Manufacturers and other Industries and (c) Service Providers; its 15 Business Sections, its 10 Thematic Committees, its Working Groups as well as the Young Chamber Network (the younger generation entrepreneurs who are members of The Malta Chamber).

This national strategy can only come to fruition if, without any further delay, it is complemented with a detailed action plan with **clearly outlined milestones and KPIs addressing**:

1. Binding policies with clear definitions on all governments and to ensure consistency in decision-making.
2. An unequivocal understanding by all parties that environmental policy must be science-based and well-grounded in research rather than pandering to popular demand.
3. A deeper understanding by our politicians of their role as guardians of our common heritage and a solid commitment to safeguarding it for future generations.
4. Good governance across the board with a land use planning system that is transparent with strong policies that clearly guide development.

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<sup>1</sup> <https://www.eea.europa.eu/publications/air-quality-in-europe-2019>



5. An inclusive and holistic educational system that emphasises mutual respect towards the common good, clearly explaining the implication of pollution and environmental degradation linked to citizens' health.
6. National progress and development measuring tools on both the economy and the environment, in such a way that the two complement each other with the environment, serving as the catalyst of economic growth; and
7. An effective public stakeholder participation at all levels and an increased awareness of responsible citizenship.



## Strategic Goal 1: Clean Air for Wellbeing, Healthy Humans and Thriving Nature

Strategic Objective	The Malta Chamber Feedback and Recommendations
<p><b>1.1 Sustainable mobility will be achieved and the need to travel reduced to respect air quality and climate targets</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. However, a bold culture change, both by business and domestic is required, particularly to shift from private vehicles to shared mobility and to reduce travel. It is to be noted that businesses are aware of the ever-increasing pressures and responsibilities to go green and to embark on this green journey, not least by replacing their transport fleet from internal combustion engine to electric</p> <p>In this context The Malta Chamber recommends the following:</p> <ol style="list-style-type: none"><li><b>1. Introduction of an e-wallet concept for shared mobility:</b> The creation of an integrated travel card is mentioned as an opportunity in the Plan. The Malta Chamber conceptualises it as an app, which may in turn facilitate impersonal data and allow for journey planning across modalities. This proposal is titled the “e-wallet” concept and would provide a certain amount of funds which users can redeem across different alternative modes of transport across the year.</li><li><b>2. Introduction of Parking fees:</b> Parking fees in congested areas, through parking meters commonly used in other countries, could encourage a modal shift in commuter transport. If any parking fees paid go directly into the proposed personal e-mobility wallet, there would not be an additional expense for people because the fee paid would be available for use for shared rides. This would also incentivize people to use shared mobility, further encouraging the modal shift.</li><li><b>3. Licence payment linked to use:</b> Drivers should pay as much as they use their vehicle, by factoring in mileage covered since the previous renewal in addition to the existing criteria of engine type, size and age of vehicle.</li><li><b>4. Improve Green Travel Plans:</b> Facilitating uptake of current schemes, such as those falling within the ambit of the Employee Transportation Deduction Act, designed to promote carpooling. The Malta Chamber believes that the schemes are too restrictive and do not allow the use of shared mobility services which require a minimum of 8 people in a vehicle and believes should scale down to 4. It should be reworked - or more general incentives implemented - to shift commuters to shared mobility solutions.</li><li><b>5. Commercial transport sustainability incentives:</b> The Malta Chamber notes that the report does not tackle enough other emissions beyond private cars, such as trucks, buses and construction vehicles. Vehicles carrying goods amount</li></ol>



to around 5% of national traffic on a typical weekday. However, during the morning peak hour, the proportion of these vehicles increases significantly to represent almost 11% of the total traffic composition. 88.7% of freight movement relate to internal distribution of goods. The Malta Chamber believes that incentives directed to night and shift operations for freight forwarders, manufacturers, importers and distributors can alleviate the demographic burden on already congested road infrastructure. The Malta Chamber also believes that greening the logistics fleet, as well as those vehicles which are most frequently in use (salespeople, delivery vehicles, doctors on call, police vehicles, etc) should be prioritised particularly because heavy vehicles may be costlier to upgrade. The setting up of a centralised logistics hub can also minimise warehousing and distribution costs for suppliers with the added benefit of reducing congestion and pollution.

6. **Lower Customs & Anti-Dumping Fees for imported EVs:** Such measure will make electric vehicles more advantageous than ICE vehicles. Less than 10,000 electric or plug-in hybrid motor vehicles are currently in Malta while we set ourselves, as a country, a target of 65,000 EVs by 2030. The Malta Chamber notes that action needs to be undertaken to ensure that the uptake of EV would be more affordable to business and public.
7. **Improve E-kickscooters legislation:** Currently, E-Kick scooters are treated as motorcycles, rather than as bicycles. Rental bicycles do not have to pay insurance, which is evident of further unfair treatment. The insurance available to these scooters is insufficient to cover many circumstances and damages. In the past months The Malta Chamber facilitated contact between the operators and TM to address difficulties outlined.
8. **Underground charging infrastructure which compliments electrification of the vehicle fleet:** Electrification of the vehicle fleet should be paired with an adequate underground charging infrastructure and projects for reallocation of on-road parking spaces to new multi-story underground parking spaces suited for vehicle charging to free up the space on the road. One must also ensure proper integration to park and ride services, adequate walking and cycling infrastructure as well as shared mobility solutions.
9. **Improve the new national policy for electric vehicle charging infrastructure:** **Opening** up the market as a new economic niche allowing the involvement of the private sector needs to be complimented with more industry-friendly incentives to allow private investors to become charging point operators.
10. **Ensure a skilled workforce on EVs:** The proper training infrastructure must be reinforced to upskill the workforce from dealing with combustion engine vehicles (ICE) to also work with EVs. Therefore, training programmes should be



	<p>upscaled and made more widely available at competitive prices so that mechanics and workshops may also receive training.</p> <p>11. <b>Better use of ferries and water taxis:</b> The Malta Chamber recognises the importance of an improved uptake of short sea trips as means of transport to minimise congestion on our roads. This alternative should be part of a wider intermodal mobility scheme.</p>
<p><b>1.2 Energy and economic sectoral activities will be performed in a manner that reduces emissions and improves air quality</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective to the reduce of our collective carbon footprint. The Malta Chamber advocates the need to act on climate change and global warming by switching to energy efficiency, evaluate our routine practices and adopt ways which invest in our future wellbeing by:</p> <ol style="list-style-type: none"><li>1. Emphasising that the <b>construction industry needs to align to the revised standards put forward by the EU Energy Performance in Buildings Directive for new buildings</b>, incentivised through fast-track processing of zero-emission applications. Lower energy costs, loans and fiscal incentives for green products/services, as well as innovative financing options, such as Energy Performance Contracting will support further this qualitative transition.</li><li>2. Reaffirming the <b>importance of aesthetically qualitative and sustainable projects</b>. Policies should be tightened to protect streetscapes and raise the quality of buildings. As a reputable organisation we commend Design-and-Build Contracts which include Quality Assurance / Quality Control as part of their remit to ensure quality of the built product.</li><li>3. Calling upon the <b>Planning Authority to issue a minimum pass mark for planning applications</b> without which applications cannot be processed further. Planning Fees should be proportionate with featuring factors including provision of water cisterns and domestic water recycling systems, reconstituted or recycled building materials, passive cooling designs, renewables, energy efficiency, and proper water piping to benefit from recycled grey water for flushing and other uses.</li><li>4. Recommending the <b>introduction of renovation trigger points</b> to prioritise the speedy implementation of a Long-Term Renovation Strategy and its measures through:<ol style="list-style-type: none"><li>a) The introduction of minimum energy performance criteria for buildings to be rented or sold.</li></ol></li></ol>



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|  | <ul style="list-style-type: none"><li>b) Deep renovation scheme targeting less efficient buildings with potential for achieving a good energy efficiency rating, which differently from “<i>Irrestawra Darek</i>”, will also support measures such as space heating and cooling, water heating and lighting.</li><li>5. Reiterating that <b>manufacturing companies should be incentivised to invest in PV systems on their industrial roofs</b> by removing rental charges for installing PVs on roof space of INDIS tenants and through government guarantees where required. Companies which opt not to invest in PVs on their industrial roofs should be charged. The scheme can be extended to parking areas which can use space more efficiently.</li></ul> |
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Strategic Goal 2: Quality Environment for Liveable Towns and Villages, Conducive to Healthy Living	
Strategic Objective	The Malta Chamber Feedback and Recommendations
<p><b>2.1 Investment in the availability and accessibility of open spaces will increase, for the wellbeing of the community</b></p> <p><b>and</b></p> <p><b>2.3 People-friendly routes within towns and villages will increase</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. We need to <b>preserve our natural open spaces while also creating more open spaces</b> while keeping in mind that the <b>open spaces being created must blend in</b>.</p> <p>Being surrounded by nature is <b>proven to improve concentration, lessen attention fatigue and drive productivity</b>.</p> <p>The Malta Chamber acknowledges that more open spaces, including more pedestrianised areas are required to improve wellbeing and quality of life. Our policy framework should allow the <b>regeneration of the country's urban areas</b>, while helping the country to meet its EU energy efficiency targets and addressing the affordability of property which is of a higher quality.</p>
<p><b>2.4 Towns and villages will be clean and well-maintained to increase liveability</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective.</p> <p>Waste management in our urban community remains a steep challenge. <b>Improved Waste Management is required as established in the last waste management strategy published in late 2021</b> and reiterated in Malta's Recovery and Resilience Plan. Establishing these regulatory standards will require upskilling and training of the workforce and a change in culture which should be partially addressed through:</p> <ul style="list-style-type: none"><li>• <b>Mandatory garbage collection solutions for all new developments of multiple units</b>, such as dedicated garbage rooms for coordination of refuse collection. This should be a requirement across the board for all new applications with the dimensions of garbage rooms relative to the size of building.</li><li>• <b>Introduction of a Garbage Bag Barcode system</b> to regularize householders who sort their garbage incorrectly. This measure will contribute towards a higher proportion of waste sorting at source and a higher degree of value recyclable products in Malta.</li></ul> <p>Furthermore, the Government should <b>reinvest taxation deriving from certain specific locality-based initiatives back into the community</b>. It is a way how the Government would acknowledge value provided by the businesses and residents of that</p>





	<p>geographical area towards the national interest. The Investment could take the form of qualified opportunity zone programmes. Localities would qualify subject to established criteria defining demographically distressed communities.</p> <p>Furthermore, The Malta Chamber believes that <b>local councils should be better resourced to cater for the seasonal increase in tourists</b> and cater for the upkeep of locality cleansing.</p>
<p><b>2.5 Community exposure levels to noise, dust and light will be managed in a manner conducive to healthy living</b></p>	<ul style="list-style-type: none"><li>• <b>Noise:</b></li></ul> <p>The Malta Chamber agrees with the intention of this Strategic Objective. The Malta Chamber in fact acknowledges ERA's noise mapping exercise which is meant to indicate the number of people exposed to noise pollution from road traffic. Nevertheless, the action plan to reduce noise is still unclear as are the necessary standards and guidelines to be enforced.</p> <p>Our territory puts our country at a disadvantage as compared to other countries. A total of 113,700 people living in the agglomeration area, are exposed to traffic noise exceeding 55dB(A). The right equilibrium needs to be sought without detrimental impact on business industries. Noise Action Plans should be prepared to reduce and control noise pollution in the agglomeration areas of 54Km<sup>2</sup>. Ambient noise in the urban areas, inside and outside the agglomeration, is made up of several sources such as: ship-repair yards, freeport, boat parties, vehicle servicing workshops, band clubs, wedding halls, street vendors, street parties, and the noisy neighbours. Whilst acknowledgement industry contribution to the economy, a balancing act should be sought through stakeholders and industry players engagement to ensure that noise standards are respected by coordinating economic activities as necessary.</p> <p>More clarity is required to render the noise regulations less ambiguous, and more fit for today's purpose. There are far too many regulatory authorities intended to regulate noise but, as a country, we lack the means or ability to enforce the regulations. If regulations are enforced, the reprieve is temporary, and delivery is far too late.</p> <ul style="list-style-type: none"><li>• <b>Dust:</b></li></ul> <p>Construction and traffic contribute to chemicals particles of coarse dust particles that make up more than half the particulate matter in the air. Businesses are faced with ever increasing pressures and responsibilities to go green and to embark on this green journey. The country needs to invest in long-term thinking and efforts which will bear fruit through appropriate and focused incentives. A collaborative approach between private enterprise and government is therefore not an option but a must.</p>



Sustainable construction products are available on the market – Insulated Concrete Form (ICF) concept, just to mention one example. ICF construction is completely dust free since material is composed from a combination of insulation and recyclable materials. This means that NZEB material will offer a dust free environment for the neighbours if practices are adopted, well ingrained, and effectively enforced.

The mandatory requirements of the revised Energy Performance of Buildings Directive must also be taken account of.

On transport, ERA's own data shows that Msida exceeds the permissible limits of dangerous particles (PM10) in the air. Government's data also shows that the priority areas to tackle dangerous pollution from traffic are Pietà, and parts of Floriana, Msida, Marsa, Hamrun, Qormi, Luqa and Paola. Residents and those who work in these localities are exposed to dangerous levels of pollution regularly.

Apart from the main Malta Chamber proposals on mobility outlined in the feedback given to Strategic Objective 1.1, The Malta Chamber looks forward to having an Air Quality Plan in accordance with the EU's Ambient Air Quality Directive. Low Emission Zones (LEZs) and Ultra Low Emission Zones (ULEZs) in which the most polluting vehicles are banned, could also be introduced. Proper and safe routes for bicycles and other zero emission personal transporters would contribute towards the realisation of this objective in the spirit of what is already provided in the Transport Masterplan 2025 and what announced recently by the Minister for Transport.

- **Light:**

According to a University of Malta study<sup>2</sup> several areas in Malta are heavily light polluted, with the main sources of light pollution being the lighting of public monuments, churches, football grounds, harbours, showrooms and excessive street lighting.

The Malta Chamber believes that moving away from a one-size-fits all criteria would consider that each area (being urban or rural) has to have its specific lighting conditions which should be streamlined but not restrained by specific lighting regulations.

Industrial Estates require a secure environment were to operate without being at the risk of damage to its premises that happen to lie close to rural areas. Streetlighting within developed areas in the vicinity of a rural area would require a different approach, with a proper balance based on scientific evidence catering for security and environment protection.

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<sup>2</sup> <https://timesofmalta.com/articles/view/large-part-of-malta-is-heavily-light-polluted-and-getting-worse.767887>



	<p>Existent rules ban high intensity searchlights or lasers pointing into the sky, often used for publicity or entertainment purposes. Upward Light Ratio should be kept to the lowest possible and maintained even when luminaires are tilted at a required angle. Lighting should be dimmed to 50% between midnight and dawn, however, commercial cannot totally switch off showrooms at night. Dimming lighting intensity and motion related anti-theft systems should be considered both to cutting down on energy use and light pollution.</p> <p>In essence, controlling light pollution should not translate into unnecessary development restrictions or banning of all artificial lighting since an element of artificial lighting is required especially in an urban environment. Installing less-intrusive luminaires with no wasted light spilled in the sky or onto areas which are not meant to be illuminated are recommended.</p>
<p><b>2.7 Towns and villages showing commitment in becoming more environmentally sustainable will be supported and rewarded</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. The Malta Chamber was proactive in drafting and presenting a new vision for Malta’s economy and beyond. Through its <a href="#">Economic Vision 2020-2025</a>, The Malta Chamber called for ‘a Smart, Sustainable Island’, in which it recognised that economic development must ultimately lead to an improved quality of life, yet it reiterates that over-prescriptive obligations will hardly advance the common cause.</p> <p>The development and the construction industry must improve and evolve with full respect for Malta and Gozo’s heritage, history, culture, natural environment and well-being. The country urgently needs a holistic master plan and revised local plans supported with clear policies which do not leave room for abusive exploitation in their interpretation and application. The <i>ad hoc</i> planning approach adopted over the years has uglified Malta, created uncertainty, excessive speculation and a non-level playing field between industry players as well as the general public. The Malta Chamber believes that a piecemeal approach to planning goes against the very spirit of planning itself. Development brief changes, partial reviews and incongruent policy interpretation and applications must stop.</p> <p>One could consider:</p> <ul style="list-style-type: none"><li>• The introduction of a ‘<b>Planning Gain for locality projects scheme</b>’ to promote the urban improvement and/ or introduction of new environmental projects on a locality basis improving quality of life. The channelling of funds to these projects (similar concept to the funding by NDSF) may find a balance between the development happening in a locality and the social projects being created for the micro population in the same locality.</li></ul>



- **Facilitating Urban Regeneration** by helping private owners of scheduled properties to access more tailored fiscal incentives to assist them in building upkeep and maintenance, going beyond the current limits of “Irrestawra Darek”. The regeneration of urban areas is to be further promoted through schemes which incentivise retailers to operate within those areas.
- **Complimenting compliance certificates with a building logbook** reflecting the structural and fabric history of the building, as well as its certification relative to its construction and post commissioning, noting the obligations of the owner to maintain the building in a good state of repair. This may anticipate the potential introduction by the EU of renovation passports.

More measures may be referred to under Strategic Objective 1.2.



## Strategic Goal 3: Biodiversity Valued, Conserved, Restored and Sustainably Used for the Benefit of Our Nature, People and Climate

### Strategic Objective

### The Malta Chamber Feedback and Recommendations

This Strategic Goal is multifaceted and requires consideration in its widest sense. The legislative framework is also very vast and besides others, it incorporates the following:

1. Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44)
2. Special Areas of Conservation (SACs)
3. Special Protection Areas (SPAs)
4. EU Habitats and Bird Directives
5. Convention on Biological Diversity
6. Convention on the Conservation of Migratory Species of Wild Animals.
7. Trees and Woodland Protection Regulations (S.L. 549.123)
8. Conservation of Wild Birds Regulations (S.L. 549.42)
9. National Biodiversity Strategy and Action Plan (NBSAP)

The Malta Chamber is of the opinion that **the simplest changes in our eco system can have direct and serious implications on our authenticity**. Our distinctiveness underpins the benefits that businesses derive from certain key industries, like tourism. Our ecosystem is intrinsically part of the experience we have to offer. Population growth, particularly during the summer months, poses an impact on our biodiversity and is a concern because pressure is intensified due to restricted demographic carrying capacity.

The **collective responsibility towards biodiversity** entails that we need deal with biodiversity policy strategically. Issues need to be integrating into existing environmental management and sustainability strategies because biodiversity is critical for most businesses, either because their processes require biological materials or because a healthy and stable environment is an integral part of the operation with a direct or indirect effect on quality.



<b>3.1 Biodiversity loss will be reduced by addressing the main pressures and threats</b>	The Malta Chamber agrees with the intention of this Strategic Objective. In addition to feedback provided for Strategic Objective 1.2, 2.1, 2.5 and 2.7, it is worth pointing out that <b>licensed environmental experts</b> should be allowed to complement guided tours to expand on educational experiences which goes beyond the historic narrative which is currently provided.
<b>3.2 Protected areas will be effectively managed to safeguard biodiversity and their services for current and future generations</b>	As explained earlier on, The Malta Chamber agrees with the intention of this Strategic Objective. Protecting and safeguarding our biodiversity is important for our tourism product since it contributes significantly to the overall uniqueness. In November 2021, <b>The Malta Chamber called for a renewed vision on Tourism<sup>3</sup></b> which seeks to connect the traveller to our country. The concept of travel is changing. For many, travel is seen as a way of understanding and appreciating alternative ways of life, learning new things about cultural and natural landscapes, and even as a means of self-discovery. To mention 2 proposals: <ul style="list-style-type: none"><li>• Any present and future development should stop undermining Malta’s natural and cultural assets.</li><li>• Halting any further encroachment of ODZ land to preserve the islands’ natural and cultural assets.</li><li>• Gozo to be given a special protection status to conserve what ultimately makes it unique and different from Malta.</li></ul>
<b>3.4 The urban fabric will improve by integrating green infrastructure and increasing the provision of accessible green spaces</b>	The Malta Chamber agrees with the intention of this Strategic Objective. Refer to Feedback given in Strategic Objective 1.2
<b>3.7 Appropriate mechanisms will be strengthened, investments mobilised and knowledge improved to enable the necessary transformative change</b>	The Malta Chamber agrees with the intention of this Strategic Objective. Adding to feedback provided for Strategic Objective 1.2, The Malta Chamber would like to add that Government should consider <b>fiscal Incentives</b> targeted to: <ul style="list-style-type: none"><li>a) <b>Property buyers or renovators</b> through ‘<b>Green Loans</b>’ to align with energy performance obligations in buildings. Government may guarantee for the deposit requested by the bank, with a preferential rate for first time buyers on stamp duty. Possibility of reimbursing a percentage of VAT on expenses disbursed on energy performance complaint buildings may also be considered.</li></ul>

<sup>3</sup> <https://www.maltachamber.org.mt/loadfile/5604f192-2f7a-464c-a8de-7829b03027ae>



	<p>b) <b>Developers</b> to invest in sustainable construction materials and operations by reducing final withholding tax from 8% to 4%. A 25% reduction on Planning Authority fees when upon commitment to specific green building standards may also be considered.</p> <p>c) <b>Building contractors</b> through a tax credit at development phase to alignment to high environmental standard obligations.</p> <p>The Malta Chamber notes that the Government has a role in facilitating a knowledge-sharing culture. The exchange of knowledge, insights and experience in order to drive a business toward key strategic goals from a tried and tested point of view will help the dual transition of our businesses.</p>
<p><b>3.8 A behavioural shift will be sought to increase citizens', land managers' and businesses' contribution to biodiversity conservation</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective.</p> <p>Further to feedback provided in Strategic Objective 1.1 and 1.2., the Malta Chamber believes that a significant part of the <b>VAT proceeds from projects</b> in localities bearing a significant impact on the residents should be reinvested in the local urban regeneration. Every Euro invested should be pegged with a rate of return tied to green investment criteria. Providing incentives to promote preservation of biodiversity within green building practices should also become customary. Voluntary schemes for construction planning should pave the way to provide reward and compensation linked to sustainable initiatives with scaling forms of support emphasising on (a) resource management (b) whole-lifecycle design and (c) design for human and environment in construction.</p> <p>Stepping up our resource management will also reduce, reuse and recycle construction inputs to avoid wastes, pollution and cost overruns. <b>Whole-lifecycle design</b> is to maintain a balance between environmental concerns and traditional requirements in construction in the design, construction, and occupation stages in construction project delivery within biodiversity parameters. The design of our surrounding environment will reinforce human within the context of the environment and ecosystem realities.</p>



## Strategic Goal 4: Responsible and Efficient Resource Use that Reflects the Value of Raw and Waste Materials in Support of Zero Waste to Landfill

Strategic Objective	The Malta Chamber Feedback and Recommendations
<p><b>4.1 Malta will transition to a circular economy to support responsible and efficient resource use</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. Official EU data shows that the target of 55% recycled packaging waste was met by all Member States, except Croatia (48.9 %), Hungary (47.3 %), Romania (44.6 %) and Malta (33.7 %).<sup>4</sup> The same data indicates that the target of 22.5 % recycled plastic packaging waste was met by all Member States, except Malta (15.4 %).<sup>5</sup></p> <p>The Malta Chamber believes that we should step further our efforts in this regard to complement the <b>Beverage Containers Refund Scheme (BCRS)</b> whose implementation is expected to start later this month. The recent new gate fees announced by WasteServ should incentivise waste separation. The Malta Chamber has called for the revision of such fees earlier this year to render them more effective without preventing the private sector from offering competitive waste management prepositions. The Malta Chamber cautions not to render such fees counterproductive and increase illegal dumping by way of circumventing this obligation. Legislation should be accompanied by adequate safeguards thereof.</p> <p>Furthermore, The Malta Chamber believes that whilst businesses are subject to mandatory compliance to waste separation, the domestic should be equally responsible to such collective obligation, especially when discarding waste in <b>black bags</b>. Piecemeal responsibility for waste policing complicates enforcement efforts. Litter includes any kind of solid or liquid waste, originating from domestic or commercial. Regardless of the specific source, discarding irregularly is offence with should be reprimanded irrespectively not selectively.</p>
<p><b>4.2 Industry-led action will contribute to sustainable production and consumption and improved waste management</b></p>	<p>While the Malta Chamber agrees with the intention of this Strategic Objective, it warns that the significant amounts of money earmarked by government for waste management risk is not having the intended effects.</p> <p>The current situation is more akin to one whereby <b>WasteServ competes with private industry</b>. The Malta Chamber believes there is a leading role for private enterprise which is essential. If the new waste management facilities being planned are to</p>

<sup>4</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Packaging\\_waste\\_statistics#Recycling\\_and\\_recovery\\_targets\\_and\\_rates](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Packaging_waste_statistics#Recycling_and_recovery_targets_and_rates)

<sup>5</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Packaging\\_waste\\_statistics#Recycling\\_and\\_recovery\\_targets\\_and\\_rates](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Packaging_waste_statistics#Recycling_and_recovery_targets_and_rates)





	<p>operate optimally, Government should not monopolise the most profitable waste streams. To the contrary, The Malta Chamber believes that Government’s role should be facilitating an implementation framework for business to venture within in line with the established regulatory provisions and obligations. The Malta Chamber therefore suggests that:</p> <ul style="list-style-type: none"><li>• The <b>Material Recycling facility</b> should either be entirely owned and managed by the private sector, or alternatively, if owned by government, should at least be operated by private industry. Any other complexes linked to the Ecohive project should also be privatised. The private sector should be invited by means of the Private Financing Instrument to identify, build, finance, operate and maintain waste management technology that enhances recycling reuse.</li><li>• <b>Establishing qualitative regulatory waste management standards</b> will require upskilling and training of the workforce and a change in culture which should be partially addressed through measure like:<ul style="list-style-type: none"><li>a) Mandatory garbage collection solutions for all new developments of multiple units, such as dedicated garbage rooms for coordination of refuse collection. This should be a requirement across the board for all new applications with the dimensions of garbage rooms relative to the size of building.</li><li>b) Food donation programmes: Restaurants, catering establishments, supermarkets, bakeries to donate excess safe, unserved food to charity, etc</li><li>c) Launch of a national clothing recycling programme matched by an awareness campaign on waste from clothing.</li></ul></li></ul> <p><b>Sustainable consumption and production</b> is about doing more and better with less. It is also about bridging economic growth with environmental practices which increase resource efficiency and promote sustainable lifestyles. Given Malta’s water scarcity on its food and energy security challenges, The Malta Chamber is committed to help government leverage its efforts with the commercial community in pursuing water security and explore alternatives which include wastewater reuse, increased awareness, use of alternative energy sources, rainwater harvesting, and implementation of nation-wide strategic water policies.</p>
<p><b>4.3 Behavioural change will be facilitated to reduce waste generation and move away from a ‘make, use, dispose’ attitude</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. Malta must aim to increase not only the quantity of secondary raw materials but also their quality, while guaranteeing safety and proper standards for the protection of human health and the environment. Construction and Demolition (C&amp;D) waste is considered the heaviest and most voluminous waste stream generated in the Maltese Islands, amounting to over 1.5 million tonnes of waste generated annually. This constitutes the largest share of waste generated in Malta, accounting to roughly 80% of the total waste</p>



arising each year:

- **Implement New Regulatory Framework for C&D Waste** to properly manage construction and demolition waste while promote a transition to a more circular economy. It would also promote the development of secondary markets for end-of-life resources. A minimum percentage of construction material, verified through an audit function, should be made up of reused material or materials recycled locally with a possibility of further reuse or recycling at the building's end of life.
- **Licensing of Building and Road Contractors should be complemented by minimum skill requirements for the construction workers** (mandatory skill card or equivalent), that must be continuously maintained through lifelong learning, as is the case in education. Uptake of certain skills may be incentivised by offering tax credits to workers, and to companies which provide corresponding apprenticeships.
- **Rudimentary site practices that are currently adopted need to be addressed.** The Government has the difficult task, as can be seen with the introduction of the Building Construction Authority, to introduce and enforce strict measures on how to manage construction works. An alternative approach would focus on the setting up of the voluntary Consolidated Contractors scheme which would guide, classify, and screen contractors on their work site practices. This can be incentivized by recognizing enrolment, investment in green measures, establishing of proper SOPs and the like. Ultimately, the scheme will reward all contractors who elevate their standards.
- **Pilot a junk mail reduction program** and entice businesses to switch to electronic newsletters.
- Preparation of a **guide on how public procurement can underpin the circular economy and prevent waste**, e.g. through requirements for the life span of products and for products that have been designed for disassembly and repair.

Having said that, **C&D Waste is not the only waste generator** and was just mentioned to cite an example which conceptualises The Malta Chamber position, which is aimed at highlighting the need to **move beyond take-make-disposal (linear economy) to take-make-use (circular economy)**. Circular economy business opportunities could be reaped if the private sector is involved in waste collection, inorganic waste processing, paper, plastic, metal, rubber, textiles and organic waste processing



	<p>(composting). The Malta Chamber believes that the circular concept fosters wealth and employment generation especially when supply chains functioning adequately given our insularity and international trade dependence. Much needs to be addressed in terms of removing institutional silos, lack of decision-making streamlining and consumers behaviour to maximise returns of a truly smooth functioning circular economy.</p>
<p><b>4.4 The efficiency and capacity of waste collection and waste management systems will be improved</b></p>	<p>The Malta Chamber is of the conviction that such Strategic Objective could be achieved if waste classification and source separation is improved coupled with <b>changes in routine cultural practices</b>. There are multiple factors which contribute to the effectiveness of such measure, amongst them what explained above re (a) <b>financial penalties to those inadequately disposing of their waste</b> and (b) <b>enforcement</b> by making best use of digital solutions and best deployment of our limited human resources.</p> <p>Lack of targeted investment on effective public transport systems, inadequate spatial planning, failure to integrate the location of land uses and accessibility, as well as a systematic removal of space for people on our roads to accommodate vehicles and parking; requires reflection. Clustering all delivery, transits, opening hours and routine daily exigencies at the same time is unsustainable. According to NSO statistics, over 415,000 cars are currently licensed, 5,000 of which obtained their license during the first 3 months of the year, with short of 60 licensed motor vehicles placed on our roads every day.</p> <p>Given the daily occurrence of motor vehicle journey exigencies, The Malta Chamber recommends that <b>waste carriers services should shift to the night when our roads are less congested</b>.</p>
<p><b>4.5 Government will lead by example by reducing its waste footprint, including through green public procurement</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. Amongst the 36 recommendations put forward by The Malta Chamber in its <a href="#">Public Procurement Report</a> 2021, it was remarked that Government should strengthen what has already been achieved and address challenges to progressively increase the share of government's procurement in greener products within its tenders.</p> <p>The Malta Chamber sees <b>public procurement as a strategic tool for Malta</b> to meet its environmental obligations to promote economic operators who are not only complying with the law but who are also pushing for progress in other priority areas.</p> <p>Being the largest consumer, government can create a critical mass which makes it economically feasible for suppliers to invest accordingly. The Malta Chamber therefore believes that all public authorities should seek to procure, goods, services and</p>



	<p>works with a reduced environmental impact throughout their life cycle when compared to goods, services and works with the same primary function that would otherwise be procured.</p>
<p><b>4.7 New opportunities will be created through digitalisation of waste management flows to improve waste data quality, modelling and handling, with a view to achieving real-time monitoring of waste flows and ensure sustainable waste management decision-making</b></p>	<p><b>Digitalisation of waste management</b> flows and based on improved waste data quality will be crucial to improve our recycling, sorting behaviour of consumer and improving options for recyclers. Technology can accurately identify various agents and distinguish nuances of the same material using AI algorithms and cameras, reducing labour costs and improving sorting precision while speeding accurately separating tons of trash per day. Cloud platforms, monitoring systems, and IoT devices can ensure better visibility of waste planning processes and operations. Today there are platforms that connect recyclers, collectors, and waste producers to facilitate traceable material flows and create digital marketplaces. There are others that add transparency, ensure correct handling, effective garbage disposal, and fair payments to contractors.</p> <p>The Malta Chamber agrees with the intention of this Strategic Objective. Amongst the measures proposed by The Malta Chamber there are:</p> <ul style="list-style-type: none"><li>a) The introduction of a <b>Garbage Bag Barcode system</b> to regularize householders who sort their garbage incorrectly. This measure will contribute towards a higher proportion of waste sorting at source and a higher degree of value recyclable products in Malta.</li><li>b) <b>AI-based smart waste bins</b>, designed for public places, enabling them to simplify recycling, compresses the waste automatically, controls the fill level and processes data for convenient waste management.</li><li>c) <b>CCTV cameras for Bring In sites</b> with 24/7 security to help mitigate criminal offences and duly disposal of waste.</li></ul> <p>The Malta Chamber believes that digital opportunities in waste management are still untapped, especially advanced <u>data analytics services</u> which allow to examine large data trends to initiate strategic changes, improve operating models, and develop more sustainable practices. Such digital solutions are key elements for creating intelligent workflows and driving innovation.</p>



## Strategic Goal 5: Land Resources Managed to Sustain Natural Functions and Increase Resilience to Climate Change

Strategic Objective	The Malta Chamber Feedback and Recommendations
<b>5.1 Land will be used more efficiently to ensure less demand for land take-up in natural, semi-natural and agricultural land, to contribute to reducing our vulnerability to climate change</b>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. The Malta Chamber is currently compiling its position as part of a consultation which will amend the <b>Lease Renewal Act</b> that provides legal definitions to a landlord's rights to regain his land and a tenant's rights to maintain that land. The Agricultural Land White Paper is wide ranging in its scope, tackling from safeguard agricultural land to the registration of such land leases. The Malta Chamber calls for coherence in both NSE and the Agriculture Land White Paper to ensure that both are in sync.</p>
<b>5.3 Spatial planning and the development permission process will be further strengthened to ensure that the environment is safeguarded for wellbeing while increasing resilience to climate change</b>	<p>The Malta Chamber believes that the <b>2006 local plans and the Development Control Design Policy, Guidance and Standards</b> need a complete review. This needs to be combined with an urgent review and publication of a new Strategic Plan for the Environment and Development (SPED), which should clearly address how our natural, historical and cultural fabric is to be preserved and how the built environment is to be developed. In addition, a comprehensive review of all planning policies is required. These policies need to be aligned with the revised SPED and they must be clear and unambiguous, leaving no room for a 'pick and choose' approach. To prevent abuses, misinterpretation and misapplication of policies, it is important to determine unequivocally which planning policies take precedence over others.</p> <p>As already mentioned, The Malta Chamber welcomes the initiation of work on a National Architecture Policy, which in our view should include support for aesthetically qualitative and sustainable projects and a set of minimum standards for all new buildings.</p>
<b>5.4 Malta's landscape quality will be managed through an</b>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. Malta needs to take stock of all land parameters, to focus on <b>land limitations, agriculture land re mapping</b> to make it productive.</p>



**integrated approach to sustain its socio-ecological systems and deliver climate solutions**

Malta's food security has been under pressure for some years. Farmers who hold small parcels of land strive to attain high productivity, despite the size of their lands which they have homestead in them too. However, with decreasing land sizes as a result of land subdivision, it is getting more difficult to survive on farming alone. In addition, Brexit led to an increase in food costs by 5.24% within a year. The latest data published by the Central Bank of Malta found that food inflation in Malta has exceeded that of the euro area from April 2021 onwards and by April 2022, food inflation in Malta stood at 1.2% higher than the euro area. As the pandemic hit Malta, people rushed to supermarkets to buy food supplies for imminent lockdowns, and the situation offered a glimpse of future crises and pressures which the country may face, particularly with climate change.

- **Piloting Agricultural Technology** to partially solve the challenges the country has in terms of availability of arable land, water scarcity and degradation and an ever-declining agricultural community.
  - a) Larger commercial scale hydroponics and aquaponics are known solutions that should be tested and incentivised in Malta. The infrastructure need may not be in rural zones but may be placed in underground industrial areas and urban locations.
  - b) Incentivize research to support the development of new technologies in the areas of alternative proteins such as algae farms.
- **Produce & Promote Compost:** Rather than convert organic waste into digestate, it should be turned into compost which can be used to regenerate Malta's soils. Businesses involved in food may be encouraged to take a proactive role to use compost to grow their own food and use that food in their kitchens, and then turn kitchen waste into compost.
- A 'Minn Taghna Campaign' promoting consumption of **locally grown and locally processed food and beverage products** which meet certain criteria and prove that they are truly Maltese or Gozitan goods.
- Invest in the **proper treatment of manure** from all livestock due to its high potential for future uses in terms of fertilisation, waste to energy and further treatment in terms of greywater. Allocate funds for a centralised treatment facility which can also be beneficial for agricultural irrigation purposes.



## Strategic Goal 6: Ecologically Diverse, Healthy and Productive Marine Waters, Capable of Supporting Sustainable Growth

Strategic Objective	The Malta Chamber Feedback and Recommendations
<p><b>6.4 Malta’s blue economy will continue to transition to a more resource-efficient, resilient and sustainable one for the wellbeing of current and future generations</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. Given the lapse of time which has passed since the publication of the most recent coastal strategy, <b>a revised Coastal Strategy</b> should be formulated to supersede the Coastal Topic Paper of 2002. Given the sheer extent of Malta’s maritime jurisdiction, The Malta Chamber believes that a comprehensive and holistic Marine Spatial Plan for the Maltese Islands is needed. On the ocean governance side, The Malta Chamber remarks that the strategy does not acknowledge Malta’s stated intention to claim a greater swath of its continental shelf as an exclusive economic zone and what this will imply for the national marine management framework.</p> <ol style="list-style-type: none"><li data-bbox="645 719 2098 858">1. Malta administers <b>Europe’s largest Shipping Registry</b> and the sixth largest in the world. Nevertheless, The Malta Chamber believes that the maritime is a sector brimming with untapped potential. Today, the maritime sector not only provides an enticing destination for yacht owners in terms of leisure, but a location that caters for repairs, refits, and maintenance.</li><li data-bbox="645 903 2098 1002">2. A holistic vision for the Maritime industry in Malta should include investment in infrastructure and a long-term plan on how to maximise <b>blue economy opportunities</b> primarily by investing in human resources, solidifying the vision into a mission implementable over a 5-to-10-year timeframe.</li><li data-bbox="645 1046 2098 1185">3. The outcome of a symposium organised by The Malta Chamber in July reaffirms that the super-yachts sector should be recognised as an integral, yet distinct, part of Malta’s tourism offering. The Malta Chamber recommends the nurture of an appropriate <b>yachting ecosystem</b> within the renewed Tourism Strategy to offer a high-end tourism product combined with the greening of the fleet.</li><li data-bbox="645 1230 2098 1359">4. The strategy also makes a nod to the need for effective <b>Marine Protected Areas (MPAs)</b>, but fails to give a timeline for the endorsement of management plans and for the initiation of actual implementation measures within the same MPAs in order to contribute towards the achievement of set conservation and management objectives for the same areas; a partnership with a number of users/stakeholders, notably the PDSA, should be entered into by ERA so as to ensure the</li></ol>



	<p>effective management and surveillance of a number of coastal and heavily-frequented areas, including the Cirkewwa MPA;</p> <ol style="list-style-type: none"><li data-bbox="645 395 2103 496">5. The strategy is also short on details on a number of technical proposals floated around within the same strategy, including the <b>involvement of fisheries</b> within citizen science campaigns and the analysis of the exchanges of energy and nutrients through marine food webs;</li><li data-bbox="645 539 2103 603">6. The Malta Chamber recommends that the <b>University of Malta</b> would be included as a contributing partner under this Strategic Objective due to the importance of research in congenial marine ecosystem restoration techniques.</li></ol>
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## Strategic Goal 7: Sustainable Water Resources that Ensure Long-Term Use and Support Water-Dependent Ecosystems

### The Malta Chamber Feedback and Recommendations

The Malta Chamber agrees with the intention of this Strategic Goal while acknowledging that Malta's **water resources** are insufficient to meet current demand, resulting in an increased dependence on unconventional water sources such as rainwater harvesting and RO technology.

The Malta Chamber notes that the proposed strategy makes no attempt at stating that Malta's **groundwater resources** will by 2050 be recognised to be a nationalised resource. This is necessary in view of a projected demographic increase and further uncontrolled water extraction and contamination. Reference is made to curb illegal water abstraction but more stringent metering of groundwater utilisation to better understand Malta's yearly water abstraction trends and allow for better groundwater recharge projections is solicited. The Malta Chamber believes that only through the availability of such data we would be able to identify the gap between natural water resource abstraction and recharge to aquifer systems will be narrowed.

The strategy acknowledges that Malta's **rainwater harvesting capabilities are not being maximised**. This is mainly due to urban sprawl and the lack of water harvesting considerations in urban infrastructure as well as the fact that current infrastructure cannot deal with periodic flash floods. It is encouraging that there is the mention of the experimental use of permeable materials instead of hard surfaces to encourage groundwater percolation. This practice might hopefully lead to the reversal of the paving of country lanes with concrete surfaces – a practice which encourages surface run off.

The increase in population and climate change should provide a sense of urgency within ERA to devise and enact enforceable measures that are tangible and measurable.

Action on groundwater extraction and groundwater protection is needed urgently. The Malta Chamber calls for a decisive approach with effective deterrents for anybody requiring large volumes of fresh water to step away from **drilling a borehole** to access this cheap source of fresh water. Such water is then pumped at will and at no charge.

The Malta Chamber is therefore of the opinion there more should be done, with clear timelines, on rainwater harvesting with adequate green stormwater infrastructure to help the country recover rainwater and bridge the gap between sustainable supply and demand, and aquifer recharge and demand.



## Strategic Goal 8: Enabling and Empowering the Required Green Transition

Strategic Objective	The Malta Chamber Feedback and Recommendations
<b>8.2 Mechanisms will be mainstreamed to catalyse a green economic transition in support of a circular and low carbon economy</b>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. With the overall goal of pushing Malta to meet its EU targets, and given the ability to achieve higher efficiency, cost-effectiveness and innovation through the private sector, The Malta Chamber endeavors to create a space for discussion on the role of private enterprise and private-public partnerships. This can be achieved through:</p> <ul style="list-style-type: none"><li>• <b>An Innovation Forum:</b> An innovation forum for green solutions and sustainable production with the aim of exploring how the private sector and government may partner on waste management.</li><li>• <b>The Right to Repair:</b> Directly encourage the repair of white goods rather than their disposal to contribute to circularity against end-of-product cycle.</li><li>• <b>Proper Enforcement and Governance:</b> Enforcement of environmental regulation and measures adopted towards the green economic transition is essential to enable the cultural shift necessary.</li><li>• <b>Facilitating Energy Efficient Technologies:</b> Facilitate the launch of a centralised database of energy efficient technologies enabling industry sectors and consumers to identify which product specifications best suited to their needs.</li><li>• <b>Implementing BCRS Without Further Delay:</b> Materials earmarked for export should instead be first offered to local manufacturers to promote a local circular economy and spare the costs and delays associated with importation of the raw materials.</li></ul>
<b>8.3 Investments and schemes that facilitate the redirection to greener sectors will be enabled while safeguarding competitiveness</b>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. While in principle there are a number of <b>funding schemes</b>, both repayable and non-repayable, afforded to the private sector through public funds and EU Funds, these schemes are often encumbered by terms and conditions that overly restrictive.</p> <p>A number of sectors such as the financial services, construction and transport sectors are frequently excluded from the eligibility criteria. This means that these schemes are focusing on a classification based on <b>NACE code</b>, rather than on the intervention that is being planned. Large companies are also often excluded from eligibility, although The Malta Chamber acknowledges that public</p>



	<p>funds must be targeted and cannot be applied in too broad a manner. However, one should also note that when utilising public funds the principle of transparency, fairness and good governance should always apply and therefore exclusions should also not be applied as a blanket measure.</p> <p>Furthermore, <b>greener investments</b> are often subject to restrictive state aid rules which greatly limit the amount of assistance that a company can receive. To give but one example, the current Article 38 of the GBER states that only the counterfactual cost of an investment, that is the difference between investing in a more efficient piece of machinery as opposed to a less efficient one, is eligible, rather than the whole cost attributed to the greener investment. This is further limited by the application of other conditions, such as the fact that investments made in order to comply with EU standards are not eligible for funding.</p> <p>In addition, the timeframes related to EU funding can also cause substantial issues. Companies require <b>approval for funding</b> before commencing any green investments. Furthermore, funding is reimbursement based, so companies are expected to carry out the investment first, according to the timeframes resulting from the evaluation procedure of the funding body, and then ask for reimbursement of the cost. This often takes the form of one interim payment claim and one final payment claim. The lack of advance payment limits the company's liquidity at the start of the project, and can be a huge obstacle that can put off companies from actually resorting to funding. This is exacerbated when it comes to co-financing schemes, where the portion of co-financing from public funds is usually fairly low.</p>
<p><b>8.4 Practices that improve environmental performance will be promoted and recognised</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. In drafting obligations to improve environmental performance, care must be taken to ensure that regulation is fit-for-purpose, with a workable due-diligence burden, given the limited resources of companies. In this respect government should ensure that <b>environmental reporting should not be excessive</b>.</p> <p>In putting into practice this strategic objective, importance should be given to the field of <b>green public procurement</b> whereby in the public procurement process an emphasis is placed on non-economic factors, particularly the promotion of environmental standards. By requiring high environmental and sustainability standards through its procurement process, government would be rewarding those companies who are investing in the green economic transition and recognising the important of this shift in the approach for the private sector.</p>



<p><b>8.6 Environmental knowledge and skills will be mainstreamed in education and training systems to support the green transition</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. <b>Education is an essential part of the green economic transition</b> and is pivotal to its long-term success. The Malta Chamber firmly believes that the integration of environmental knowledge and skills into mainstream education from a young age will have the dual effect of helping to develop the right cultural mindset as well as preparing these students to participate in the green economy of the future.</p> <p><b>Specialised state schools for trades and STEM</b> from a certain age onwards would complement a more wide-ranging mainstream exposure to environmental related skills and careers. These skills and careers must be publicised and well-marketed, with the necessary communication and training to allow for support from guidance counsellors. Furthermore, the €20m investment in science labs in schools should start off without further delay.</p> <p>However, The Malta Chamber is an advocate for <b>life-long learning</b>, and in order for business to be able to buy into the opportunities that the green economic transition can offer, they require a workforce that is suitably trained to do so. The government must therefore also focus on promoting the integration of this material into reskilling and training courses that are available to adults, both in a structured and formal educational format as well as in more flexible and work-friendly formats.</p>
<p><b>8.7 Effective communication efforts will mobilise a change in mindset and behaviour</b></p>	<p>The Malta Chamber agrees with the intention of this Strategic Objective. The Malta Chamber believes that <b>communication is key</b>, particularly given the foreseeable challenges related to changing mindset and behaviour.</p> <p>In the context of the current tight labour market, which is heavily limiting operational resources, businesses should be assisted to effectively access funding opportunities to mobilise this transition in behavioural practices. <b>Simplifying communication</b> will allow businesses and individuals to understand the targeted benefits of grants and fiscal incentives and will facilitate the take up of such energy efficiency opportunities in a more proactive manner. This communication strategy would be complimented by an increase in business-oriented energy efficient machinery schemes which incentivise companies to replace old machines, taking into consideration the remaining useful life of the machine that is being replaced. These schemes should be based on the power saving element as a pre-requisite qualifier and the percentage of the remaining useful life of the old machine when compared to the years of the new machine. This will enhance business return on investment and improve uptake.</p> <p>In addition to the above, one-to-one business clinics advising on energy efficiency investments and opportunities would help in conducting gap analyses.</p>



## Conclusion

The Malta Chamber calls for the speedy realisation and implementation of the NSE, linked to a concrete action plan and KPIs, with national political consensus. However, until Government Authorities remain fragmented, such Environmental policy is hard to implement.

The Malta Chamber policy making takes a holistic approach addressing sectors ranging from energy, circular economy, sustainable mobility, and building and construction, with the overarching message being that increased ambition is not only desirable but is a necessity.

The Malta Chamber recognises that economic growth must have increased quality of life, wellbeing and sustainability as its objective. Businesses must plan long-term, in sync with the European Green Deal and an economic transformation in which Malta can either lead or be dragged behind.

Within its economic vision for Malta 2020-2025 published a couple of years ago, The Malta Chamber had identified human capital, digitalisation, sustainability and good governance as the four pillars on which future economic growth needs to be built. If any of these four are weak, long-term prosperity will be compromised. Malta is making progress on digitalisation and good governance but is struggling with sustainability and human capital.

Sustainability is more challenging because it requires making more judicious use of resources today to improve future outcomes for society at large. The deferment of benefit and its accrual to society at large rather than the individual requires a lot of education and a radical change in value set to be truly embraced. There are reasons to believe that the moment we embrace this, even our biggest immediate problem – which is human capital – starts being alleviated.

Companies want to focus on addressing real sustainability issues encountered on the ground, not on writing reports. Excessive reporting obligations discourage investment, including investment to reach sustainability objectives. Enterprises need a strong alignment of sustainability standards globally to avoid a fragmentation of reporting requirements around the world.

The Malta Chamber takes this opportunity to thank its members within its various committees, including Circular Economy, Energy Efficiency and Conservation and Sustainable Mobility, as well as its Business Sections in Tourism, Health and Wellness, Electrical and Electronics, Yachting and others for their contribution towards this document.

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