

KNZ Contribution to: 'Malta Low Carbon Development Strategy (LCDS)'

The National Youth Council of Malta, KNZ, welcomes the new LCDS. KNZ expresses its broad agreement with the overall aim, that of a zero-carbon economy by 2050. KNZ also recognizes that in outlining both mitigative and adaptive measures that are cross-sectoral in nature, the strategy can form a solid foundation for guiding climate action in the decades to come. Specifically, KNZ strongly supports and encourages the following measures to reduce emissions:

- Increased uptake of solar PV, introduction of offshore PV's and the eventual construction of Offshore Wind Farms,
- Improvements in service and electrification of public transport,
- Support for active transport and an ICE Cut-Off date of 2030,
- Measures supporting deep renovation of buildings,
- Establishment of re-use, repair centres and piloting smoking bans on several beaches,
- Treatment and re-use of greywater in hotels.

Furthermore, KNZ fully agrees with a significant number of the adaptation measures, such as but not limited to:

- Research into green infrastructure, green buildings in Malta, with subsequent introduction of shaded avenues, green roofs, community gardens,
- Modification of standards for road materials to be able to withstand higher temperatures, and absorb water,
- Climate retro-proofing public buildings,
- Strengthening the continuous and rigorous surveillance of infectious disease, considering the risk of new vectors introducing new diseases, vaccinations for new climate change related diseases,
- Introduction/Maintenance of drinking water fountains in urban areas and tourist areas.

However, KNZ requests clarifications on the following points:

1. Why do aviation and shipping emissions fall outside the scope of the Low Carbon Development Strategy? If so, where are aviation and shipping emissions accounted for?
2. Considering that the implementation of the LCDS is multi-ministerial, who will be the point of reference to ensure its implementation? What penalties are being considered, should emissions fail to fall as expected or anticipated?

Moreover, KNŻ is critical of the fact that although transport contributes significantly to Malta's carbon footprint (21.1% of GHG emissions generated in Malta), no measures actually specifically target reducing the number of private internal combustion engine cars on the road. It is the view of KNŻ, that this lack of a disincentive, greatly risks making a key aspect of the LCDS ineffective. Beyond incentives to pull people towards active transport, public transport, multi-modal travel, there must be disincentives that push people away from relying solely on the private car. Options that ought to be considered include congestion charges, parking tolls, a carbon tax and high emission vehicle taxes, which coupled with strict enforcement can strengthen the emission abatement potential.

Thus, although the LCDS marks an important step forward in Malta's National Climate policy, and can serve as a foundation to guide climate action, it must be strengthened further. As currently drafted, KNŻ expresses concern that the strategy will not deliver the emission reduction targets, which were not only promised, but needed if the worst effects of climate change are to be averted.

A handwritten signature in black ink, appearing to read 'Liam Axisa', written over a horizontal line.

Liam Axisa

KNŻ President

A handwritten signature in black ink, appearing to read 'SB', written over a horizontal line.

Steven Bajada

KNŻ Director of Climate and Sustainability