



28 May 2020

The Hon Prime Minister Dr Robert Abela
Cc The Hon Minister for The Environment, Climate Change and Planning
Dr Aaron Farrugia

Dear Sirs,

First of all, on behalf of the 60 organisations and NGOs forming part of the Spazji Miftuħa Coalition, we thank you for your time and interest in listening to our concerns related to the public open spaces of Aħrax and Mizieb, and the proposal to hand over their management to the FKNK.

During our meeting, we have highlighted these points of concern:

1. These venues should be open for the general public all year round, at all times. We highlighted the issue that even today, despite the lack of an appropriate legal framework, people are not allowed to enter these areas or even camp in designated campsites during the hunting seasons;
2. That irrespective to what is being said by FKNK, once an agreement is signed it will be hard for the government to guarantee accessibility and impose any accountability on matters concerning these areas. Enforcement in this country leaves much to be desired and the general public has, many times, found it hard to defend its own rights (like entering Mizieb and Aħrax) once they are stopped by members of a private lobby;
3. There is no justification for this agreement, for the following reasons:
 - a. The fact that other NGOs have management agreements simply does not automatically give FKNK the right to manage the land. Primarily, because FKNK is an entity based on the interest of its own members. Unlike NGOs forming part of this coalition, its mission is not the common good of the country but the leisure of its members.
 - b. The fact that FKNK claim to have been cleaning the areas for a number of years also does not mean they should manage it. There are

various entities that clean various parts of the island, including a camping organisation that from L-Aħrax, a few weeks ago, have cleared bags with hundreds of shotgun cartridges. We praise and appreciate the FKNK for doing their part, but this is not enough to give them this land. FKNK members are already privileged: their activities take from nature, from what is ours as a country, to the detriment of society. CSR and PR gestures such as their donation of €13k for COVID-19 are their way of paying society back for their privilege, and not a justification for Government to give them land.

- c. This land has been illegally administered by this group for long years. Over and above this, they have allowed multiple illegalities to take place, most notably illegal buildings such as the attached, which by law require PA permits. These areas are veritable meccas of illegalities because the FKNK do not have control of their own members. This track record is bad enough and cannot be rewarded by granting them legal management of the areas.
4. The areas the Government is thinking of giving to the FKNK is enormous. It has a size of approximately five times Buskett Gardens, or the equivalent of 230 football pitches.
5. We are not asking for hunting to be abolished from these areas. We are asking Government to invest in these areas for the benefit of all Maltese citizens. To this end, Ambjent Malta has good leadership and direction; with proper investment and resources they can manage these areas and others in the future by employing site wardens. The role of such wardens would be to educate, engage and enforce the regulations of each site. We believe this proposal will find the right balance between rights and duties for both hunters and general public.
6. Nature and open spaces in Malta have never had a Prime Minister who has given them the importance they deserve. This explains the ever-increasing pressure on open spaces and the general public's call for a better quality of life, through the protection of these open spaces and nature. After COVID-19, we can see that the economy will require a boost and we are concerned that the environment will be the first victim of this. In light of this, the proposal to hand over these areas to the FKNK is even less fair and rather anti-social. A walk in the countryside is the only form of free entertainment people can enjoy in their quality time. Anything done to restrict this would be an injustice.
7. The coalition has now the support of 15,500+ individuals and 60 formal or informal organisations that are in line with our position. Apart from that, a

survey handed to you during the meeting shows that public opinion is outraged at the proposal of handing these sites' management to the hunters.

We were pleased that you both of you have agreed with us that these sites should be open to the general public all year round, at all times.

We are also encouraged by the fact that you understood our concerns, primarily that while hunting can be guaranteed by an agreement between FKNK and Government, the management of the place will remain under the Government's wing so as to safeguard everyone's interests and not just that of the FKNK.

This will send a strong signal of leadership, and a direction that our open public spaces are for everyone to enjoy.

Kind regards

Wayne Flask
Mark Sultana
Claire Bonello
Matthew Abela

obo Spazji Miftuħa





Images 3 & 4. Illegally built trapping hides located within Mizieb.



Images 5 & 6. Some illegally built hides are freshly built and made of concrete whilst others are ramshackle collections of wood, stone and rubbish.