

The Environmental Concerns of the Maltese Church

Introduction

Pope Francis' 2015 encyclical *Laudato si'*, *On the Care of Our Common Home* has been described as "one of the most significant statements on human-environment relationships ever made within the Catholic Church."¹ Yet this was by no means the first ever Church pronouncement on care for the environment. In fact, the "Green Encyclical" itself quotes several sources within the tradition of the Church and even beyond, going as far back as the Canticle of Francis of Assisi, and even quoting the 9th century Muslim mystic Ali Al Khawas. Pope Francis also relies heavily on his predecessors who likewise gave importance to safeguarding creation.²

The local Church's concern for the environment did not start with *Laudato si'* either (hereafter *LS*). It would suffice to mention, *inter alia*, the Diocesan Synod held between 1999 and 2003. Even before that, Prof. Carmelo Sant, the distinguished biblical scholar, had dedicated his 1986 oration to theology

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¹ Dominic Wilkins, "Pope Francis, *Care for Creation*, and Catholic Environmental Imagery," *Environmental History* 25 (2020): 361.

² See for example, Cristina L. H. Traina, "Sources of Authority in *Laudato si'*" in *Laudato si' and the Environment: Pope Francis' Green Encyclical*, ed. Robert McKim, 1st ed. (London: Routledge, 2019), 152-166.

graduands precisely on the matter.³ In any case, the pronouncements and initiatives taken by the local Church on environmental matters allow the Church to engage in dialogue in the “public square” on consequential issues to contemporary and future generations. At the same time, however, they ought to form consciences for responsible citizenship and faithful stewardship among its own members.⁴

It is a pity, therefore, that the teachings and initiatives of the local Church on the environment are not widely known. While an opinion position or statement might make it to the local media, there has been no sustained documentation of these proposals. This article, therefore, has the purpose of remedying this, by outlining and summarising the local Church’s pronouncements related to the environment.

The broad aim of this present article is therefore to document the environmental concerns of the local Church and their context. The four objectives of the study are (i) to collate the various statements and proposals done by the Church in Malta in one place; (ii) to allow readers to familiarise themselves with the various statements and proposals that the local Church has made; (iii) to show that the local Church has not been silent on environmental matters; (iv) to show that Church statements have not been partisan in nature, for they deal with issues which have plagued the islands under various political and ecclesiastical administrations; (v) to see which issues have been at the forefront, and which ones might not have been a pressing concern till now.

This article will first outline the concerns of the local Church before *Laudato si’*, and then present the proposals which the Interdiocesan Environment Commission put forward to citizens and the government (*ad extra*) as well as to the Church itself (*ad intra*) following the publication of this landmark encyclical. Though it is not the intention of this article to see which proposals have been taken up or not, the article proceeds to outline further proposals made to the government, then discusses four scenarios in which the Church itself (or its affiliates) were challenged on an environmental issue, and finally concludes by looking at how the Church celebrated the Season of Creation in the past few years.⁵

³ Carmelo Sant, “Natural Environment: The Biblical Perspective,” published in this issue of *Melita Theologica*.

⁴ See United States Conference of Catholic Bishops, *Forming Consciences for Faithful Citizenship*. This document, first issued in 1976, is revised every four years, with the current version being approved in November 2019 and published in 2020.

⁵ This is “an annual Christian celebration of action and prayer for our common home.” See <http://seasonofcreation.org>.

Environmental Concerns before *Laudato si'*

The Diocesan Synod, held in Malta between 1999 and 2003, had recognised that: “we have taken so long to start seeing the protection of the environment as our primary duty as Christians. As time goes by, however, we further recognise how environmental justice is at the core of our responsibilities as Christians”⁶ and that “the Church has to be a witness of all this even in the administration of its own property.”⁷

The Synod dedicated an entire chapter of the synodal document *Culture, Society, Church* on the Church and the Environment. This document recognised that already then, ecological problems were increasing in Malta, while pointing out the moral character of the ecological crisis and the responsibilities of Christians.⁸

Recognising that “the environmental question is a question of justice,”⁹ the Synod thus called for the setting up of an Environment Commission within the Pastoral Secretariat with the aim of

disseminating knowledge, sensibility and education about the environment, especially in light of the Word of God and the social teaching of the Church, and to formulate a policy-guide, both for those who bear responsibility in all the institutions of the Church as well as for every Christian.¹⁰

The Synod also held that environmental concern should be the task of the whole Church, lay, clergy and religious alike, with parishes collaborating with local councils to protect the local environment.¹¹

The synodal document continues to argue that the Church must retain its prophetic voice and issue public statements to clarify her position as it had done various times.¹² It refers to Church statements on incidents of vandalism on historical places and public property,¹³ in the year leading to the new

⁶ Sinodu Djoċesan, *Djagonija u Ġustizzja* (Malta: Arcidjoċesi ta' Malta, 2003), para. 20.

⁷ Ibid., para. 20.

⁸ Sinodu Djoċesan, *Kultura, Soċjetà, Knisja* (Malta: Arcidjoċesi ta' Malta, 2003), para. 52.

⁹ See Sinodu Djoċesan, *Djagonija u Ġustizzja*, 20. Cited in Sinodu Djoċesan, *Kultura, Soċjetà, Knisja*, para. 53.

¹⁰ Ibid., para. 53.

¹¹ Ibid., para. 54.

¹² Ibid., para. 56.

¹³ See Gużeppe Mercieca and Nikol Ġ. Cauchi, “Il-Harsien tal-Wirt Naturali, Kulturali u Storiku: Dikjarazzjoni tal-Isqfijiet,” n.d., *Bullettin ta' l-Arcidjoċesi* 81 (June 1994): 142.

Millennium,¹⁴ in the case of the building of a cement factory in the centre of Malta close to habited space,¹⁵ in the case of the Rabat Golf Course,¹⁶ vandalism on the Mnajdra temples,¹⁷ the Archbishop's message for Christmas 2001,¹⁸ and the Pastoral Letter on the occasion of the Feast of the Assumption 2002.¹⁹ In working for justice, the document continues, the Church should not be

¹⁴ See Ġużeppi Mercieca, Nikol Ġ. Cauchi and Annetto Depasquale, "Il-Kelma ta' Alla dwar in-Natura u l-Annimali: Messaġġ tal-Isqfijiet ta' Malta" (14 January 1999), *Bullettin ta' l-Arċidjoċesi* 101 (September 1999): 488-491. Here the bishops emphasise the importance of caring for the environment based on the Genesis creation narrative, Jesus' words on the Kingdom of God and the need for educating all Catholics to recognise this responsibility.

¹⁵ See "L-Iżvilupp Ekonomiku u l-Harsien ta' l-Ambjent: Staqarrija tal-Isqfijiet Maltin," n.d., *Bullettin tal-Arċidjoċesi* 102 (September 1999): 589-590. The bishops weighed in on the controversy of the setting up of a cement plant that was being proposed to be built in the centre of Malta at the time. They were particularly concerned about the impact that this plant would have on the health of the people living in the area and on the workers themselves, apart from the environmental damage.

¹⁶ See "Kjarifika tal-Knisja: Dwar il-Kaž tal-Golf Course tar-Rabat," n.d., *Bullettin tal-Arċidjoċesi* 108 (March-April 2001): 279-280. The bishops made reference to several articles that appeared in the media about the proposed golf course. In particular they reiterated that the land in question (that covers more than 5000 acres of fertile land) is land that had been passed on to the State according to the agreement between the Holy See and the State of Malta on 28 November 1991 and which was ratified on 18 February 1993. Article 2.1 of the Agreement had stated that the land must be used for the safeguarding of the environment, to promote agriculture and to respond to the most pressing social issues such as social housing, etc.

¹⁷ See Ġużeppi Mercieca, Nikol Ġ. Cauchi and Annetto Depasquale, "Staqarrija tal-Isqfijiet Maltin dwar il-Hsara fl-Imnajdra," n.d., *Bullettin tal-Arċidjoċesi* 109 (May-June 2001): 360. In response to acts of vandalism carried out on the prehistoric temples, the Bishops reiterated the responsibility that every Maltese citizen has to respect and safeguard creation and the environment, and all that which shows the dignity of humankind and the gifts given to it by the Creator.

¹⁸ See Ġużeppi Mercieca, "Messaġġ ta' Mons. Ġużeppi Mercieca għall-Milied 2001," n.d., *Bullettin tal-Arċidjoċesi* 113 (January-February 2002): 61. The Archbishop recalled how the birth of Jesus in a cave shows how there is nothing in the natural environment that is not to be celebrated. Therefore, everything in our power must be done to protect the natural environment and to make sure that any damage to the environment is avoided, including that done with economic interest.

¹⁹ Ġużeppi Mercieca, Nikol Ġ. Cauchi and Joe Magro, "Dmirna fil-Harsien tal-Holqien u l-Ambjent: Ittra Pastorali mil-E.T. Mons. Ġużeppi Mercieca, Arċisqof ta' Malta u mil-E.T. Mons. Nikol Ġ. Cauchi, Isqof ta' Għawdex fl-Okkażjoni tal-Festa ta' Marija Mtellgħa s-Sema - 2002," (7 August 2002), *Bullettin tal-Arċidjoċesi* 116 (August-October 2002): 352-355. The bishops took the opportunity to remind the faithful of the responsibility of the world leaders to protect the natural environment, especially the seas and that the land which was handed on to the State in the 1993 agreement is to be used only for the most important social purposes, humanitarian, educational and cultural.

disheartened and, since all forms of work in favour of justice requires courage and perseverance, the Church should encourage and support those working on environmental protection.²⁰

Following the Diocesan Synod, the Environmental Commission (hereafter, Commission, Kummissjoni Ambjent, or *KA*) was set up by a decree dated 23 August 2003, with the aim of “creating awareness of the responsibility and the ethics of safeguarding the environment, defining the policy/rules that should guide those responsible in the Church in environmental questions and offer technical and scientific suggestions to Church Authorities in specific matters concerning the environment.”²¹

Following extensive consultations, on 1 April 2005 the *KA* published guidelines aimed at leading the Maltese Church “to achieve ISO14000 and Eco-Management and Audit Scheme standards.”²² The then commission’s chair, Victor Axiak, told a news conference that an environmental audit “would start with the Curia and its administrative offices, RTK and the Media Centre, and the Zejtun parish,”²³ and that the *KA* “would take a stand both when the issues involve others but especially when they involve the Church.” In the words of Paul Pace, who had compiled the guidelines, the Church was trying to lead by example.²⁴

²⁰ Sinodu Djoċesan, *Kultura, Soċjetà, Knisja*, para. 56.

²¹ <https://church.mt/archdiocese/interdiocesan-commissions/interdiocesan-environment-commission/> (accessed on 10 July 2021). The aims were also explained by Archbishop Mercieca: Curia Communications Office, *Messaġġ ta’ Merħba minn Mons. Arcisqof Ġużeppi Mercieca Dmirna fil-Ħarsien ta’ l-Ambjent*, Press Release 66/2004, 21 May 2004. <http://www.maltachurch.org.mt/Press/2004/2004-066.pdf> (no longer online; accessed more than 10 years ago).

²² Rosanne Zammit, “The Church in Malta is Set to Become More Environment Friendly,” *Times of Malta* (2 April 2005), <https://timesofmalta.com/articles/view/church-to-become-eco-friendly> (accessed on 5 January 2021).

²³ Most probably this parish was chosen because its parish priest, Rev. Eric Overend (1966-2013) was an ardent environmentalist and a member of the Environmental Commission. See also, Eric Overend, *Our Ecological Responsibility: Philosophical and Theological Perspectives*, SThL dissertation, University of Malta, 1994.

²⁴ Zammit, “The Church in Malta is set to become more environment friendly.”

Since then, the *KA* has been quite active, responding to a number of public consultations,²⁵ and issuing a number of statements and press releases.²⁶ The remit of the *KA* was widened to include the Gozo diocese by a decree dated 26 September 2008, creating the Interdiocesan Environmental Commission, set up with the aim:

to assist the Church in our country to reflect on matters connected with the protection of the environment and the promotion of sustainable life-styles, in the light of its pastoral responsibilities; to undertake useful initiatives in this field; to suggest appropriate action to Church members for the protection and development of the environment and the implementation of the principle of sustainable development and to offer its support where necessary; to place its reflections on the environment at the service of the whole of Maltese Society.²⁷

Environmental Concerns after *Laudato si'*

The publication of *LS* gave a greater impetus to the local Church to continue the work in favour of the environment that had already begun by the Diocesan Synod. Within months of the launching of the Maltese translation of the encyclical, the Commission forwarded a series of proposals to citizens and the government (*ad extra*), and to the Church (*ad intra*). Environmental concerns were also present in some of the local bishops' pastoral letters.

Launch of the Maltese Translation

The Maltese translation of *LS* was launched by Archbishop Charles J. Scicluna during a presentation at the Archbishop's Seminary, Rabat, on 24 June 2015. The

²⁵ For example, on the Archdiocese's document *Nirrestawraw il-Festi Flimkien* (29 November 2009); and on the local Waste Management Plan (9 February 2013); on Fireworks Factory Complexes (8 February 2014); on the Solar Farms Draft Policy (9 February 2015); on the Draft National Tourism Policy (13 February 2015).

²⁶ Among those not cited elsewhere in this article, see for example, *Press Release about Respecting Animals* (28 October 2011); *Fireworks, Health, and the Environment* (25 May 2012); *Armier: Protecting the Rights of Those Who Observe the Law* (30 August 2014); *The Development of the South-East Coast of Malta* (15 December 2014); *Position Paper on the Paceville Masterplan* (24 November 2016); *Statement about the Application for an IPPC Permit at Delimara* (17 December 2016); *Statement about the Azure Window Collapse* (10 March 2017); *Statement about the Need of a Master Plan for Marsa and the Inner Grand Harbour Area* (26 January 2018); *Worrisome Decisions by Planning Authority and Environment Resources Authority* (13 March 2018); *Is the Fate of St George's Bay Hanging in the Balance?* (30 May 2018).

²⁷ *Direttorju Ekkleżjastiku tal-Arċidjoċesi ta' Malta u tad-Djoċesi ta' Ghawdex* (Malta: Archbishop's Curia Communications Office, 2021), 152-153.

encyclical seems to have been well received locally,²⁸ with Friends of the Earth (Malta), an NGO that strives for environmental justice, stating that Francis has shown “impressive and inspiring leadership” where many elected leaders had failed.²⁹

The Immediate Context of the Local Launch

The launch of the encyclical coincided with a hotly debated environmental issue in Malta. This was a proposal to give pristine, undeveloped, outside-development-zone land in Żonqor Point (Marsaskala, Malta) to build a new “American University,”³⁰ and to “build at least two hotels and a promenade on a large stretch of land on the south eastern coast – from Żonqor point to Smart City!”³¹ The Commission was very clear:

In two opinion papers issued under different administrations, the Church Environment Commission has warned that if we persist in finding ways and means to justify construction on land which is ODZ, our country will continue

²⁸ See, for example, Hector Scerri, “Hearing the Cry of the Earth: We are All Responsible for It,” *Times of Malta* (21 June 2015), <https://timesofmalta.com/articles/view/hearing-the-cry-of-the-earth-we-are-all-responsible-for-it>; Leo Brincat, “Impact of Papal Encyclical,” *Times of Malta* (24 June 2015), <https://timesofmalta.com/articles/view/impact-of-papal-encyclical>; Kristina Chetcuti, “Christians Must Defend Nature, Archbishop Says,” *Times of Malta* (25 June 2015), <https://timesofmalta.com/articles/view/christians-must-defend-nature-archbishop-says>; Ranier Fsadni, “Pope’s New Middle Ages,” *Times of Malta* (25 June 2015), <https://timesofmalta.com/articles/view/Pope-s-new-Middle-Ages>; Colm Regan, “Pope Speaks to Us Too,” *Times of Malta* (26 June 2015), <https://timesofmalta.com/articles/view/Pope-speaks-to-us-too>; Joe Inguanetz, “God saw that it was good,” *Times of Malta* (28 June 2015), <https://timesofmalta.com/articles/view/God-Saw-That-it-Was-Good>; Mario Attard, “A Prophetic Encyclical,” *Times of Malta* 3 July 2015, <https://timesofmalta.com/articles/view/A-prophetic-encyclical>; Ray Azzopardi, “Why We should Listen to the Voice of the Church,” *Times of Malta* (5 July 2015), <https://timesofmalta.com/articles/view/Why-we-should-listen-to-the-voice-of-the-Church>; Joe Borg, “Are we the Children of Cain?,” *Times of Malta* (12 July 2015), <https://timesofmalta.com/articles/view/Are-we-the-children-of-Cain>; Maurice Cauchi, “A Prophetic Message,” (17 July 2015), <https://timesofmalta.com/articles/view/A-prophetic-message> (all accessed 30 March 2021).

²⁹ “Pope Calls for ‘Action Now’ to Save Planet, Stem Warming,” *Times of Malta*, (19 June 2015), <https://timesofmalta.com/articles/view/pope-calls-for-action-now-to-save-planet-stem-warming> (accessed on 30 March 2021).

³⁰ Kummissjoni Ambjent, *Reaction to the Proposal for the Construction of a University at Marsaskala: All that Glitters is not Gold* (18 May 2015).

³¹ Kummissjoni Ambjent, *Statement by the Interdiocesan Commission for the Environment: The Development of the South-East Coast of Malta* (6 January 2015).

to suffer irreparable damage to the natural environment with all the repercussions on social and economic development.³²

This led to the creation of a “citizens’ movement” named *Front Harsien ODZ* (Front for the Protection of Outside Development Zones), which then organised a protest near Parliament on Saturday June 20, 2015, calling “on the government to abide to the local plan for the south of Malta and reconfirm the designation of the entire Żonqor area as a national park where no development is allowed and where the livelihood of farmers is protected.”³³

Commenting on “the biggest environmental demonstration ever seen in Malta till then,”³⁴ Joseph Borg, a priest and well-known media commentator, wrote:

Żonqor was just one of the reasons why so many people participated. Demonstrators were cross and angry. They were protesting against the taking over of Malta by land speculators who are now cashing the pre-electoral secret deals. These speculators are now claiming their pound of flesh and a bit more as well.³⁵

It is interesting, however, that Borg continued: the Pope’s “strong position has now to be translated into concrete action by the Church in Malta as well.”³⁶ While not chiding the Maltese Church, he was certainly nudging certain sectors within it to heed the call to environmental justice.

Borg pointed out that among the protesters, there was “a contingent of Jesuits/Jesuit sympathisers.”³⁷ Their presence was a reminder that the protest was not only about Żonqor; among other things, Russian speculators were proposing to build a very large shooting range in a large ODZ in the limits of Mosta which would impact not only the life of nearby residents, but also the

³² Ibid. Citing, Kummissjoni Ambjent, *Opinion Paper: It-tibdil fil-konfini tal-iżvilupp* (2006); and Kummissjoni Interdjoċesana Ambjent, *Reazzjoni tal-Kummissjoni Ambjent tal-Knisja fuq l-abbozz ta’ policy li tittratta l-iżvilupp li jsehb barra mill-konfini tal-iżvilupp* (“ODZ policy”) (2013).

³³ Philip Leone-Ganado, “Public protest against Żonqor Point development on June 20,” *Times of Malta* (6 June 2015), <https://timesofmalta.com/articles/view/public-protest-against-żonqor-point-development-on-june-20> (accessed on 5 July 2021).

³⁴ <https://timesofmalta.com/articles/view/massive-turnout-for-protest-against-development-on-odz-land> (accessed on 5 July 2021).

³⁵ Joe Borg, “Crossed pencils and crossed people,” *Times of Malta* (21 June 2015), <https://timesofmalta.com/articles/view/crossed-pencils-and-crossed-people> (accessed on 5 January 2021).

³⁶ Ibid.

³⁷ Ibid.

thousands who visit Mt St Joseph (a Jesuit retreat house) every year.³⁸ As Borg was quick to point out, however, the Jesuits cannot be accused that they were protesting because of “their” interests: “This is not the first time that the Jesuits have taken an active role to save the environment. Malta’s Jesuit communities had actively participated in the Front Kontra l-Golf Course movement some years back.”³⁹ He lamented, however, that “the pro-environment activism of the Jesuits is not supported by other religious orders; not even by the children of the patron of the environment.”⁴⁰

Seminar

The Maltese Church was not hesitant to take action on *LS*, and in December 2015 the *KA* organised a two-day conference in which State and Church representatives were invited to discuss and possibly commit themselves to a number of proposals inspired by the encyclical. Entitled “*Laudato si’: From the document to action*,” the first session discussed proposals which the *KA* was forwarding to citizens and the government,⁴¹ while the second session, held in the Bishop’s Curia, Rabat, Gozo, on the morrow, considered proposals inspired by the encyclical which the Commission addressed to the Church.⁴² The recommendations are very comprehensive and summarising them would not do them justice. Only the main themes will therefore be reproduced here, and the reader is encouraged to read them in their entirety.

³⁸ See Kummissjoni Ambjent, *Press Release on the Proposed Complex of Shooting Ranges at Busbesija, Mosta* (16 June 2015).

³⁹ Borg, “Crossed pencils and crossed people.”

⁴⁰ *Ibid*; the reference is to the Franciscan Order. One notes, however, that the Conference of Religious Major Superiors, whose President at the time was a Franciscan Capuchin friar, had issued a press release against the construction of the shooting range in Mosta. See “Conference of Religious Major Superiors appeals against construction of shooting range in Mosta”, *Times of Malta* (15 May 2015), <https://timesofmalta.com/articles/view/conference-of-religious-major-superiors.568300> (accessed on 20 September 2021).

⁴¹ The first session was held on Friday, 4 December 2015, at the Catholic Institute, Floriana, at 6pm. The panel included the Hon. Prime Minister Joseph Muscat, the Hon. Leader of the Opposition Simon Busuttil, Carmel Cacopardo (*Alternattiva Demokratika*), Joanna Spiteri Staines (*Din l-Art Helwa*), Prof. Simone Borg (Malta’s Ambassador for Climate Action), and Dr Mark Mifsud (Centre for Environmental Education & Research, University of Malta), with Dr Marie Briguglio moderating the discussion.

⁴² The panel included Rev. Mgr Karm Refalo and Rev. Gordon Refalo (President of the Council of Parish Priest Council in Gozo and Malta, respectively), Rev. Mark Ciantar OFM (Youth Alive Foundation) and Reuben Pace (General Secretary of M.U.S.E.U.M.).

Proposals for Citizens and the Government

Beginning with the premise that one should not fall into the trap of thinking that citizens are powerless to improve the environment or of concluding that our country's small size means that it cannot make a difference on the international level, the Commission offered twenty points for reflection and action to Maltese citizens and the Maltese Government.⁴³

Addressing citizens, the Commission pointed out that all residents are responsible for the environment and proposed a continuous examination of conscience on one's lifestyle and consumption practices (Proposal 1).

The second proposal was to invite the best minds in the country to propose ideas how the country can develop without harming the environment and using the least land possible (Proposal 2).

The Commission then appealed to Maltese businesses (including property and land developers) to develop innovative ideas (Proposal 3), and abandon common ideas of the past which have led to loss of resources and which have harmed the environment and the common good.

Noting that the installation of solar panels and water heaters have created a visual disaster in the urban landscape, decreasing its aesthetic value, the Commission invited professionals to propose innovative ideas for the design and use of solar energy which the Creator has given to the country. It also called on the Planning Authority to provide best practice guidelines related to design (Proposal 4).⁴⁴

The fifth proposal was addressed to the government and authorities to enforce regulations without fear or favour since unequal enforcement creates unfair competition. The Commission, for instance, drew attention to indigenous trees that are destroyed in order to then declare land as "abandoned" in need of rehabilitation (that is, development); the illegal use of public land which

⁴³ Kummissjoni Ambjent, *Proposals addressed to civil society and Government, inspired by the Encyclical Laudato si'* (in Maltese); http://knisja.mt/files/article/137_KA_PROPOSTI_-_PAJJIZ.144965332175.pdf (accessed on 5 January 2021). Already in 1967 Malta had proposed establishing the Ocean's deep sea bed as part of the heritage of humankind. This had the effect of ensuring that this resource is used only for peaceful purposes and for the benefit of future generations. Similarly, Malta placed climate change on the International political agenda in 1988. The authors are grateful to the anonymous reviewer who pointed out this particular detail.

⁴⁴ The KA had already presented a policy document responding to the public consultation on the Government's Solar Farms Draft Policy Document. Kummissjoni Ambjent, *Solar Farms Draft Policy Document* (9 February 2015).

deprives others from its peaceful enjoyment; and the illegal use of untreated sewage, fertilisers and pesticides.

The Commission then invited citizens to better appreciate the rich biodiversity of the Maltese Islands, including migratory birds and fish, which are “sometimes ... the forgotten species of the Maltese Islands” (Proposal 6).

The Commission even appealed to politicians and public officials to ensure that the places they visit or the events they participate in (even in the case of fundraising for noble causes) are covered with the necessary planning and environmental permits lest illegalities be condoned (Proposal 7).

The appeal to politicians was also broadened, encouraging them to give an example in their private life in all the things they do which involves development (Proposal 8). Rather than resorting to legal and regulatory loopholes for their benefit, they should remove them; and authorities considering applications by politicians should show no fear or favour.

The next proposal invited the government to allocate funds for the study of the demand and supply of property in Malta and the economic and fiscal environment in which this operates (Proposal 9).

The Commission then invited enterprises to look at their Corporate Social Responsibility in a wider way (Proposal 10), rather than seeing this simply as an occasion for good publicity. Companies should carefully examine the products they produce, the processes they adopt, making sure they are not harmful to the environment, employees, or ordinary citizens.

The next proposal appealed to political parties not to make pre-election promises (either in secret or in electoral manifestos) which refer to a particular project involving land use, or to identify a specific land for a particular development (Proposal 11). Moreover, politicians must make it clear that the demands of the few who knock on party doors should never take precedence over the common good.

The *KA* then appealed to the Government and authorities to ensure transparency, scrutiny and real public participation in the planning process (both private and public projects) (Proposal 12), arguing that “some irreversible damage would not have been done” had this been the case in certain developments in the past.

Proposal 13 appealed to the Government (the largest landowner in Malta) to make the necessary reforms in the way it leases or passes ownership of public land to third persons, and to ensure transparency and justice in tendering processes.

The next proposal appealed to the government to make the best use of local talent in the decision making processes related to planning and the environment

and that political leanings should not determine promotion or appointment (Proposal 14).

Proposal 15 appealed to the government to protect the limited space of the Maltese Islands by establishing processes and a planning framework which are truly responsible and rigorous, and to strengthen the Planning Authority while making sure that there are mechanisms of checks and balances. The Commission lamented the replacement of the “Pjan ta’ Struttura” (Structural Plan) with the very weak Strategic Plan for the Environment and Development (*SPED*), together with a change in policies which made it easier to allow non-agricultural developments in outside development zones. The Commission thus argued that *SPED* should be reviewed, and any process for approval should include a public consultation on the strategic directions prepared by Cabinet in consultation with the Planning and Environment Authorities. Authorities should then study different policy options which would be subsequently open to public consultation before Cabinet approval.

Proposal 16 invited the government, relevant authorities and developers to change the culture of car use, and to recognise the relationship between development and accessibility and therefore plan accordingly. Unfortunately, accessibility (which is not only about providing roads and parking spaces) has not been a key consideration when planning projects.

Proposal 17 invited the Planning and Environment Authorities to publish an annual report on the effect of policies and procedures on the natural, built, social and economic environment, as well as on people’s wellbeing.

Proposal 18 invited the Government and the Environment and Planning Authorities to prepare and implement regulations on sound and light pollution to protect the rights of those who would like to enjoy silence and peace.

Proposal 19 appealed to the Government to intensify its national and international efforts to fight climate change. The Commission also appealed to citizens to examine how their lifestyle affects climate change and to think of alternative products and lifestyles. The vision Malta had when it proposed to the UN that climate should be considered as a common heritage of mankind should inspire the Maltese to change their lifestyle.

Proposal 20 appealed to the participants in the seminar to write one resolution for the year dedicated to the Jubilee of Mercy “in order to create harmony between yourself, your citizen brothers, and the environment.” As the Commission put it, “Change starts now.”

The participants were addressed by Archbishop Scicluna who started off by pointing out that Pope Francis preferred to speak of creation, rather than the

environment, for the former is a relational term which implies not only the existence of a Creator, but also that of a subject of love.⁴⁵ Pointing out that the Prime Minister had been in Paris for discussions on climate change that same week, the Archbishop highlighted the fact that one needs to look at politics as an expression of great love, as the pope had pointed out in *Evangelii Gaudium* (EG, 205). We thus pray, said the Archbishop, that those who enter politics do so to give their life to society and to the common good, which should be promoted by the structures of state.

The local context, the prelate continued, required particular attention, for small as we are in resources, the greater the duty to careful attention. “Every piece of land is precious; every tree has a name and surname;” indeed, he pointed out, trees have become landmarks in the country, and the smallness of our land demands a strong sense of responsibility from politics as well as the Church.

Mgr Scicluna continued by focusing on the question of beauty which is essential in environmental commitment and which should be transgenerational:⁴⁶ not only should we pass on to future generations the significant heritage of cultural and architectural beauty which we have inherited, but we must “make justice” to the beauty that past generations have left to us.⁴⁷ It is not enough, therefore, to install photovoltaic technology that works well; for this should be done as a “mission” not to uglify the same environment which it is meant to protect. Indeed, there is a link between environmental and architectural beauty and the value of life.

The Archbishop continued by saying that, as a society, we need to be honest about the temptations we face, for this honesty will enable us to be courageous in the face of important decisions. One of these relates to the rule of law, a principle which applies to everyone, and without which there would be a culture of impunity. We have suffered a lot, argued the Archbishop, from generations of politicians who did not have the courage, or political will, in front of clear

⁴⁵ Message by Archbishop Charles J. Scicluna, Catholic Institute, Floriana, 4 December 2015 (in Maltese). <https://church.mt/proposals-addressed-to-civil-society-and-government-inspired-by-the-encyclical-laudato-si-environment-commission/> (accessed on 5 January 2021).

⁴⁶ Beauty is a concept which the Maltese bishops have returned to often. See, for example, Charles J. Scicluna, Mario Grech, *Cherishing what is beautiful and good*, Pastoral Letter for Lent 2018 (10 February 2018). See also, Charles J. Scicluna, Mario Grech, *Merciful like the Father*, Pastoral Letter at the beginning of the Jubilee of Mercy (8 December 2015): “... need to safeguard the beauty of God’s creation ... to sow beauty and not pollution and destruction.”

⁴⁷ For more on intergenerational environmental justice, see Emanuel Agius, “Intergenerational Justice,” in *Handbook of Intergenerational Justice*, ed. Joerg Chet Tremmel (Cheltenham: Edward Elgar, 2006), 317-332.

illegalities. Moreover, while working to protect the environment and looking forward to a life worth living, one needs to resist a spirit of entitlement. This needs to be controlled for nothing protects the environment better than a politics and an attitude which does not look at the short term but rather on the consequences of one's decision.

In conclusion, the Archbishop thanked "Providence for the clear word of Pope Francis," while promising to listen to the proposals that the Commission would be making to the Church on the morrow, committing himself to humbly hear the proposals of the Commission which, he pointed out, is known for being a discomfiting voice also for the Church, and to implement whatever is necessary.

Proposals for the Church

The following day, the second session of the conference debated the *Kummissjoni Ambjent's* proposals to the local Church in the light of *LS*.⁴⁸ This exercise in calling on the local Church to take on certain proposals related to the environment indicated how ready or otherwise the Church is to listen and to implement changes on such issues of great import.

In its proposals to the Church, the *KA* focused on the last chapter of the encyclical, in which the Pope calls for ecological conversion and the development of new convictions, attitudes and ways of life, for the most important and fundamental change in the environmental question must be that of the person. In front of this new cultural, spiritual and educational challenge, the Commission argued that the Church must "re-evaluate, in the light of the Encyclical, its role as a Mother (who loves, cares for and welcomes everyone), as a Teacher (for the Truth), but also of a Sister (who accompanies human beings at all times of their lives) and of a Servant (who serves especially the marginalized)," as it focuses on the educational process which leads to harmony between oneself, others, nature, and God.

These proposals were structured around an educational process which included four main points: (1) gaining *awareness and sensitivity* to what is happening around us; (2) developing *attitudes and values* that build an environmental ethic that responds to both the cry of the land and the cry of the poor; (3) developing *skills that enhance creativity* and the drive to solve the world's problems; and (4) *active involvement* in actions that improve quality of life.

⁴⁸ Kummissjoni Ambjent, *Proposals addressed to the Church inspired by the Encyclical Laudato si'* (in Maltese). http://knisja.mt/files/article/138_KA_PROPOSTI_-_KNISJA.144933985025.pdf (accessed on 5 January 2021).

With respect to (1) *awareness and sensitivity*, the *KA* started by pointing out that (a) in the formation it offers to people, the Church needs to focus more on how the concept of “creation” can become the context of individual and collective spirituality (*LS*, 217), rather than speaking about more “environmental” themes. (b) A *theological discernment* is necessary, especially on the last part of the sixth chapter of the encyclical, and the results of this discernment should be disseminated and implemented in the fields of teaching related to the Church. (c) The principles of an integral ecology (with its environmental, social and human dimensions) should be regularly treated in homilies and catechetical programmes, from those prepared for the youngest to those prepared for adults, especially families (*LS*, 213). This can only happen if integral ecology would have a non-peripheral role in the of formation of clerics and religious communities (*LS*, 214). (d) The Church should take the initiative to partner with local and national entities to offer programmes of environmental education which focus on integral ecology and which help to develop a community committed to resolve the problems which are harming the world (*LS*, 219).⁴⁹

With respect to (2) *attitudes and values* which answer the cry of the earth and the cry of the poor, the Commission asked the Church (a) whether it was ready to move away from “the current economic model built on consumerism that leads to overuse of resources, land use and feasts”; and (b) whether it was willing to promote moderation by being a living example of the simplicity of a life without ties to the objects she possesses (*LS*, 223). The Commission was clear: (c) “We would like to see a Church that is not afraid of the truth about environmental issues that concern it and is ready to take action to prevent abuses within it” (*LS*, 218).

Focusing on the (3) *skills* needed to solve environmental problems, the Commission proposed that any education programs offered by the Church should (a) offer a time of *spiritual reflection*, “for this is the root of motivations which arouse passion to care for the world” (*LS*, 216), while (b) providing concrete and practical ways of *translating principles into actions*, which manifest love for God and his creation (see *LS*, 211), “simple daily gestures which break with the logic of violence, exploitation and selfishness” (*LS*, 230).

Turning to (4) *active involvement* to improve the quality of life, the Commission proposed seven ideas. The first was that, while avoiding all forms

⁴⁹ This can be seen, for example, in the local church’s partnering with Nature Trust during some Seasons of Creation as explained elsewhere in this article; and with *Din l-Art Helwa* to appeal that St Ignatius Villa in St Julians would be scheduled and protected. Kummissjoni Ambjent, *Sqarrija mill-Kummissjoni Ambjent dwar Villa San Injazju f’San Giljan* (6 December 2017).

of partisanship, the Church should be “a strong voice which guards and defends creation” (*LS*, 217), generating public pressure so that decisions are taken in favour of environmental policy (*LS*, 179) and in order to ensure a broad process of public consultation and participation in decisions related to projects which impact communities (*LS*, 183).

The second was that “when the Church (including Religious Orders) is considering disposing of land or buildings it should adopt a transparent policy that includes genuine consultation with the Christian community especially those residing in the locality where the property is located.”

The third proposal was that a structure should be created in parishes “either as a new Commission or as another function of the PPC – with the aim of ensuring that the operation in the parish is in line with the values proposed by the Encyclical.”

The fourth proposal was that “during the liturgical year that has just begun, each parish and Religious Order must prepare a plan with measures that reflect the values proposed by the Encyclical. The measures shall be such that they can be measured annually so that their implementation can be evaluated.” The *KA* proposed that these should cover various areas and activities of the parish or Religious Order, including feasts and fireworks. While mentioning the following examples: resources, including property, which are being used or not; resources which will be diverted from current activities to improve the life of disadvantaged people; energy use and waste management, the Commission left parishes and Religious Orders free to be creative, but any adopted measures should be public so that they the Christian community might be inspired while parishes learn from each other.

The fifth proposal was that both at parish and national levels, pastoral plans should be designed in a way which places the practice of evangelical values in the context of an integral ecology. These should proclaim a new model of man, life, society and the relationship with nature which is offered as an alternative to the consumer model promoted by the means of communication and efficient market mechanisms (*LS*, 215).

The sixth proposal was that “the Church should be ready to, where necessary, refuse to carry out projects – even if it has all the legal permissions – in order to foster the common good and improve the quality of life of the community” (*LS*, 123). To drive this point home, the Commission continued to propose that “a point of reference in the Curia so that environmental or development projects proposed by any Church entity would first have to undergo scrutiny before being submitted to the authorities for permission.” This, the Commission

argued, would ensure that proposed projects would really be promoting the common good.” In addition, it proposed clear guidelines related to the use of land and buildings belonging to the Church so that these would be truly used for the common good.

The final proposal was that the Church should ensure that in its schools, Education for Sustainable Development, a cross-curricular theme required by the National Curriculum Framework, would be based on the principles of integral ecology, for a good education will sprout a seed that can bear fruit throughout life (*LS*, 213).

The conference’s second session was addressed by Bishop Mario Grech who focused on human health as part of ecology. The Gozitan bishop started his reflection by recalling that *LS* bolsters an integral ecology wherein the human and the natural environment are related such that “we cannot adequately combat environmental degradation unless we attend to causes related to human and social degradation” (*LS*, 48). The environmental question is to be placed in the net of human relations and responsibilities such that “a true ecological approach *always* becomes a social approach; it must integrate questions of justice in debates on the environment, so as to hear *both the cry of the earth and the cry of the poor*” (*LS*, 49). The central challenge humans face, the bishop opined, is to recognise that: “We are not God” (*LS*, 67). The ancient stories found in the book of Genesis “bear witness to a conviction which we today share, that everything is interconnected, and that genuine care for our own lives and our relationships with nature is inseparable from fraternity, justice and faithfulness to others” (*LS*, 70) and that “care for nature is part of a lifestyle which includes the capacity for living together and communion” (*LS*, 228). This therefore requires an examination of conscience and an acceptance of conversion, to go beyond what is politically correct and call things by their name. In the name of integral ecology, the bishop then proceeded to call out certain practices of unjust discrimination in the health care sector where those who could pay were given priority over the poor, citing *LS*, that “An integral ecology is also made up of simple daily gestures which break with the logic of violence, exploitation and selfishness” (*LS*, 230).

Proposals Made in Pastoral Letters

In many of their pastoral letters, the bishops often took the opportunity to deliver a strong message exhorting the faithful and the authorities alike to treasure and safeguard the environment. In so doing, they articulated the integral

ecology that Pope Francis laid out in *LS*, and which would be further elucidated in *Fratelli Tutti*.⁵⁰

Just before the 2013 general elections, the bishops pointed out “four aspects of great importance,” one of which was the protection of the environment as “an invaluable patrimony” which must not be spoiled beyond repair so that it can be enjoyed by future generations.⁵¹ Two years later, just after the publication of *LS* and at the beginning of the Jubilee of Mercy, the bishops proposed three concrete signs in which the faithful could be merciful just like their heavenly Father (see Luke 6:36). The first of these is safeguarding the weak and vulnerable including “the human person from the moment of conception (the human embryo) to the point of natural death” and immigrants. The second is caring for creation; while the third is forgiving one’s enemies. They insist that creation mirrors God’s mercy, and that our care of creation similarly manifests our mercy towards others.⁵²

Interestingly, while not a pastoral letter in the usual sense, the then Bishop of Gozo, Mgr Mario Grech, penned a letter to children in his diocese, bringing *LS* to their attention and urging them to be environmentally conscious and responsible.⁵³

Just before the 2017 general elections, the bishops issued a very short pastoral letter which, at first glance, did not mention the environment specifically. Yet the bishops guided voters’ conscience by stating: “Our vote is an answer to this question: what kind of society do we want for ourselves and for future generations?”⁵⁴ which, at least in the minds of the present authors, recalls Pope Francis’ question in *LS*, 160.

In a particularly powerful pastoral letter delivered on the occasion of the Nativity of Our Lady in 2018, the bishops used the Pope’s words to call out the injustices against the environment and against the disadvantaged in Maltese

⁵⁰ Pope Francis, *Fratelli Tutti*, Encyclical Letter on Fraternity and Social Friendship (2020).

⁵¹ Paul Cremona O.P., Mario Grech, Charles J. Scicluna, *Respect towards the Truth and one another*, Pastoral Letter regarding the General Elections 2013 (25 January 2013).

⁵² Charles J. Scicluna, Mario Grech, *Merciful like the Father*, Pastoral Letter at the beginning of the Jubilee of Mercy (8 December 2015).

⁵³ Mario Grech, *Letter to Children on the occasion of the World Day of Prayer for the Care of Creation (1st September 2015)* (26 August 2015). One notes that Archbishop Cremona had started the practice of summarising pastoral letters to children.

⁵⁴ Charles J. Scicluna, Mario Grech, *Shouldering our Responsibility*, Pastoral Letter for the 2017 General Election (13 May 2017).

society.⁵⁵ In particular, they criticised harshly the injustices in the housing sector which were leading to a lot of suffering especially among those of lesser means. They noted the “escalating rent crisis” as a result of which many “are ending up on the streets,” since some sections of society “do not even qualify for a bank loan.”⁵⁶ The bishops therefore called for a “solution and commitment from everyone” lest the Maltese become a society which is indifferent to these new types of poverty which is also destroying the hope of many.⁵⁷

“Home” was the theme of another pastoral letter, this time for Lent 2019, in which the bishops took the opportunity to point out, even if only briefly, several interrelated issues: “The erosion of trust in institutions, the lack of respect for human life from conception, poverty, destruction of the environment, corruption, and other issues.”⁵⁸

Finally, in their 2021 pastoral letter, the bishops take inspiration from *Fratelli Tutti*, where they focus on social friendship as the antidote to several vices that plague Maltese society, including “the uglification of our natural heritage.”⁵⁹

Renewed Proposals to the Government

General Elections 2017

The proposals of the Environmental Commission to civil society and the government were updated before the general elections in the year 2017.⁶⁰ Since these proposals were limited to political parties, the earlier proposals addressed to citizens (Proposal 1: Examination of conscience; and Proposal 6: Biodiversity and hunting, trapping and fishing), to land developers and enterprises (Proposal 2: Innovative, sustainable projects; Proposal 3: No greenwashing; Proposal 10: Corporate Social Responsibility), and to authorities (Proposal 4: Guidelines on

⁵⁵ The bishops point out to “the honesty needed to question certain models of development, production and consumption” (*LS*, 138), and the fact that lack of housing is a major issue for human ecology (*LS*, 152).

⁵⁶ Charles J. Scicluna, Mario Grech, Joseph Galea-Curmi, *Building our Houses on A Rock*, Pastoral Letter on the Feast of the Nativity of the Blessed Virgin Mary (3 September 2018).

⁵⁷ *Ibid.*

⁵⁸ Charles J. Scicluna, Mario Grech, Joseph Galea-Curmi, *Do not be Afraid to take Mary Home*, Pastoral Letter for Lent 2019 (9 March 2019).

⁵⁹ Charles J. Scicluna, Anton Teuma, Joseph Galea-Curmi, *Building a Society based on Care and Solidarity*, Pastoral Letter for Lent 2021 (20 February 2021).

⁶⁰ Kummissjoni Ambjent, *Twenty Proposals to Political Parties for the 2017 General Election* (11 May 2017). <https://church.mt/twenty-proposals-to-political-parties-for-the-2017-general-election/> (accessed on 5 January 2021).

solar panels and water heaters; Proposal 5: Enforcement of regulations) were dropped.

Some ideas which had been previously proposed to the government seem to have been abandoned (Proposal 17: Annual report on effect of policies and procedures on the environment; and Proposal 19: Fight climate change). Others were proposed once again: Proposal 18 on sound and light pollution became New Proposal 5: Noise Control policy, and New Proposal 6: Light Control policy. Proposal 9: National study on demand and supply of property became New Proposal 10: National property study. Proposal 7: Sanctioning illegal development with one's presence became New Proposal 7: Policy relating to the use of illegal establishments for political and philanthropic purposes. Proposal 11: Pre-electoral promises became New Proposal 11: No secret promises and New Proposal 12: No promises to be made relating to particular land-use projects or specific land. Proposal 16: Culture of car use, previously addressed to both developers and the government, now called for traffic solutions from the government (New Proposal 18).

Some proposals were strengthened. Rather than simply calling for transparency and public participation in the planning process (Proposal 12), the Commission called for full transparency and publication of Cost-Benefit-Analysis (CBA) studies (New Proposal 13) and for public consultation during the initial stage of a Cost-Benefit Analysis (CBA) on options for any project to be financed by the European Union (New Proposal 19). Rather than simply proposing transparency and justice in the tendering process for leasing and selling of public land (Proposal 13), the Commission now asserted that the environment, the national heritage and the common good of communities are not for sale (New Proposal 14), insisting on transparency and fair competition (New Proposal 15) and restrictions on the use of direct orders (New Proposal 16). Instead of simply asking for competent decision making which was not dependent on political leanings (Proposal 14) and a better planning framework and strengthening of the PA (Proposal 15), the Commission now requested checks and balances at the Planning Authority (New Proposal 17), as well as a full revision of planning policies relating to developments in the countryside (New Proposal 3) and a revision of development plans and planning policies (New Proposal 4). Moreover, instead of simply exhorting politicians not to resort to legal loopholes (Proposal 8), the Commission now proposed that Members of Parliament should be required to submit a written declaration related to permit applications (New Proposal 8), and to positions they hold in companies and private enterprises (New Proposal 9). Furthermore, instead of

hoping that regulations should be enforced without fear or favour (Proposal 5), the Commission called for granting the power of veto to the Environment and Resources Authority (New Proposal 1) and to the Superintendent of Cultural Heritage (New Proposal 2). The proposal before the General Election 2017 also included a proposal related to the proposed tunnel between Malta and Gozo (New Proposal 20).⁶¹ This is perhaps better clarified in Table 1 below.

Table 1: Changes in Proposals to the Government from 2015 to 2017.

Proposal number (2015)	Subject	Addressed to whom	2017 Proposals
1	Examination of conscience	Citizens	Dropped
2	Innovative, sustainable projects	Land developers and enterprises	Dropped
3	No greenwashing	Land developers and enterprises	Dropped
4	Guidelines on solar panels and water heaters	Authorities	Dropped
5	Enforcement of regulations without fear or favour	Authorities	Dropped; instead becoming: Granting the power of veto to the Environment and Resources Authority (New Proposal 1); and to the Superintendent of Cultural Heritage (New Proposal 2)
6	Biodiversity and hunting; trapping and fishing	Citizens	Dropped

⁶¹ On this proposal, see also Kummissjoni Ambjent, *Towards Sustainable Connectivity between Malta and Gozo* (21 March 2019); Kummissjoni Ambjent, *L-Ebda ġustifikazzjoni fl-assenza ta' studji pubblika tal-alternattivi għaliha. Rapport mill-Kummissjoni Interdjoċesana Ambjent dwar il-Mina bejn Malta u Għawdex* (6 February 2020).

7	Sanctioning illegal development with one's presence	Politicians	Became: Policy relating to the use of illegal establishments for political and philanthropic purposes (New Proposal 7)
8	Exhorting politicians not to resort to legal loopholes	Politicians	Became: Members of parliament should be required to submit a written declaration related to permit applications (New Proposal 8); and to positions they hold in companies and private enterprises (New Proposal 9)
9	National study on demand and supply of property	Authorities	Reproposed as New Proposal 10: National property study
10	Corporate social responsibility	Land developers and enterprises	Dropped
11	Pre-electoral promises	Politicians	Became: New proposal 11 (no secret promises) and New Proposal 12 (no promises to be made relating to particular land-use projects or specific land)
12	No promises to be made; transparency and public participation in the planning process	Politicians	Became: full transparency and publication of Cost-Benefit-Analysis [CBA] studies (New Proposal 13); and for public consultation during the initial stage of a CBA on options for any project to be financed by the European Union (New Proposal 19)

13	Transparency and justice in the tendering process for leasing and selling of public land	Authorities	Became: the environment, the national heritage and the common good of communities are not for sale (New proposal 14); transparency and fair competition (New Proposal 15); restrictions on the use of direct orders (New Proposal 16)
14	Competent decision making not dependent on political leanings	Authorities	Became: Checks and balances at the planning authority (New Proposal 17)
15	Better planning framework and strengthening of the PA	Politicians	Became: Revision of planning policies relating to developments in the countryside (New Proposal 3); and Revision of development and planning policies (New Proposal 4)
16	Culture of car use	Addressed to both developers and government	Became: Traffic solutions from the government (New Proposal 18)
17	Annual report on effect of policies and procedures on the environment	Authorities	Dropped
18	Sound and light pollution	Authorities	Reproposed as noise control policy (New Proposal 5); and light control policy (New Proposal 6)
19	Fight climate change	Authorities	Dropped

20	The proposal before the General Election 2017 also included a proposal related to the proposed tunnel between Malta and Gozo (New Proposal 20).		
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The Importance of Planning

Every year, the *Kummissjoni Ambjent* issues a statement on World Urbanism Day (or World Town Planning Day, celebrated on 8 November since 1949) to highlight the importance of sound planning for Malta.

In 2015, the Commission focused on the ramifications of Bills relating to development planning and environment protection which were due to be debated in Parliament.⁶² The Commission believed that these would weaken procedures and planning policies at the expense of the common good. The *KA* had already voiced its concerns in an Opinion Paper stating that the adoption of the changes would lead to “the collapse of governance at the Planning Authority due to the lack of checks and balances, reintroduce legally-sanctioned ministerial involvement in the planning process and will also create the right climate for corrupt practices.”⁶³ The proposed changes, argued the Commission, are

aggravated by the fact that the replacement of the Structure Plan by the so-called Strategic Plan for the Environment and Development is itself a very weak document which does not even deserve the adjective ‘strategic’. Moreover, changes to policies that have been carried out render development in Outside Development Zones much easier.⁶⁴

Arguing that “transparency, scrutiny and proper public participation in the planning process is crucial” in both private and governmental projects, the Commission appealed to the Government to reverse its decision to exempt projects in hospital-designated areas from Environmental Impact Assessment procedures or from the development permit application process. The

⁶² <https://church.mt/message-by-the-interdiocesan-commission-for-the-environment-on-the-occasion-of-world-town-planning-day-2/> (accessed on 5 January 2021).

⁶³ Kummissjoni Ambjent, *Opinion paper on the Bills relating to Development Planning, Environment Protection and the Environment and Planning Tribunal* (7 August 2015).

⁶⁴ Ibid.

Commission lamented that “earmarking large tracts of land for ‘educational or health related purposes’ seems to be the latest fad adopted to silence objectors of the project and attempt to justify the irresponsible (and unnecessary) use of land.” Certainly, the Commission pointed out as an example, educating and training drivers did not necessitate the building of a racing track in ODZ.

The following year, the Commission’s statement reiterated its previous recommendation of a national study on the demand and supply of property on the islands (see Proposal 9 and New Proposal 10), as well as the fiscal and economic environment related to it. The exposure of local banks to this market, for example, is well known, as is the link of certain industries which might suddenly relocate elsewhere.

Once again, this statement had been preceded by an opinion paper on high-rise buildings which contained the same proposal.⁶⁵ Though the proposal was renewed prior to the 2017 Budget, the idea failed to be included in the Budget speech and the Commission therefore reiterated its call on World Town Planning Day 2016. While arguing that the increase in buildings should not be justified simply on the grounds that “the economy is growing” or that “Government should not interfere in the property market,” it was also true that some policy measures which intervene in the property market, even if intended to provide affordable housing, might actually create other problems (see *LS*, 20). The Commission thus invited the government to fund such a study and its updates since these would have important implications for “planning purposes, the safeguarding of the environment and truly affordable housing.”⁶⁶ Thus, “It is imperative that the study, its publication, its ownership and its updating is a transparent process. The study should be entrusted to the responsibility of an independent body that would have representatives (whose names should be made public) of all stakeholders.”⁶⁷

⁶⁵ Kummissjoni Ambjent, *Is the Gain of the Few Rising Above the Common Good?* (12 August 2016). The Commission held that: “statements to the effect that building upwards is the only alternative to avoid urban sprawl would only hold water if (i) all existing buildings in our islands are being effectively utilized, (ii) it is proven that the standard of living in our islands will improve thanks to these high rise buildings and (iii) absolutely no building activity is in fact being carried out beyond development zones.”

⁶⁶ Kummissjoni Ambjent, *Message on the Occasion of World Town Planning Day 2016* (8 November 2016). <https://church.mt/message-by-the-interdiocesan-commission-for-the-environment-on-the-occasion-of-world-town-planning-day/> (accessed on 5 January 2021).

⁶⁷ Ibid. See also, Kummissjoni Ambjent, *The Study by MDA on Property Development Cannot Substitute a National Property Study by Government* (13 February 2017).

For World Town Planning Day 2017 the Commission highlighted its concerns that the current planning system was developer-driven rather than community-centred. The revision of Local Plans should be published, rather than having piecemeal partial reviews, and “an exercise to identify and address conflicts that may exist between various planning policies, and between such policies and development plans” was needed.⁶⁸ The *KA* in fact questioned whether pre-electoral premises were hindering the publication of these revised Local Plans. Unfortunately, the national heritage was not a priority, and the *KA* reiterated its stand that the Environment and Resources Authority, as well as the Superintendence of Cultural Heritage should be granted the power to veto development applications. Since it was concerned that plans and policies were not drawn up on a community-based perspective, it once again highlighted the need for a national property study, especially to ascertain whether current developments were creating a bubble, which could easily burst, and “whether the Citizenship by Investment Programme (IIP) and possible money-laundering activities are contributing to the inflation of property prices in the country.” Moreover, “The Planning Authority, the Environment and Resources Authority, the Lands Authority, the Attorney General’s Office and Parliament are to exercise full transparency and respect of the laws, treating all bidders for public land equally,” and the *KA* appealed to all professionals working in these institutions “to uphold their responsibilities towards the current and future generations and resist any pressure in changing their professional opinion.” Furthermore, “the *KA* urges the Office of the Guardian for Future Generations to make its presence felt strongly in order to safeguard the environment for future generations,” and for trees to be protected when widening roads as well as included in road planning and design.⁶⁹

On the occasion of World Town Planning Day 2018,⁷⁰ the *KA* wrote to the European Commission and the European Parliament suggesting that in any EU-funded project needing a Cost-Benefit-Analyses (CBA), there should be a public consultation in the choice of options the CBA would study; these options would be listed in an addendum to the CBA report; the financial, economic, social and

⁶⁸ Kummissjoni Ambjent, *Planning for Today for the Few – Not for Tomorrow for Everyone*, Statement on World Town Planning Day (7 November 2017). <https://church.mt/planning-for-today-for-the-few-not-for-tomorrow-for-everyone/> (accessed on 5 January 2021).

⁶⁹ See also Kummissjoni Ambjent, *The Value of Trees* (1 September 2017).

⁷⁰ Kummissjoni Ambjent, *Message for World Town Planning Day – Public Participation in the Cost-Benefit- Analysis Process*. Letter to Jean-Claude Juncker and the College of Commissioners, and to Antonio Tajani, President of the European Parliament (5 November 2018).

environmental reasons why these public suggestions were rejected; and that the entire CBA report should be made public, with no “commercial reasons” being used as an excuse. The *KA* argued that communities impacted by EU-funded projects requiring a CBA should have a say “at the very initial stage” of the project’s consideration, rather than when the actual planning application is submitted, for this would be too late. This would also minimise the risk of the approval of less sustainable options and, to any objectors who would argue that this was yet another bureaucratic hurdle, the Commission argued that “bureaucracy which is at the service of communities, is commendable and should not be dismissed.”⁷¹

In 2019, the *KA* highlighted the importance of a planning process which is “not hijacked by vested interests.”⁷² It questioned whether long term planning was being discarded so as not to lose economic opportunities for growth, and the uncertain cumulative impacts of piecemeal revision of Local Plans. Moreover, it could not understand how the government could allow development in ODZ areas, claiming that the planning commissions were independent, when these in fact follow plans and policies which are formulated by the government and which the government can change. Indeed, it lamented the fact that its concerns about the 2014 Rural Policy and Design Guidance have been repeatedly ignored. Though a panel to review this policy has been set up, the *KA* questioned whether a consensus could actually be reached considering that “the interests

⁷¹ Antonio Tajani had replied that the European Parliament shares their views and that, as President of the European Parliament, he had forwarded the proposal to the rapporteurs working on the regulations for the EU financial programme for the years 2021-2027. The *KA* also took the occasion of the European Election in 2019 to invite Maltese candidates to promote, if elected, the *KA*’s proposal that “all citizens, both in Malta and in all other member states of the European Union, would be given the opportunity to express their views, effectively and at the right time, when all the alternatives in a development proposal financed by the EU are being considered.” Kummissjoni Ambjent, *Proposal to Candidates for the Malta European Elections 2019* (22 May 2019).

⁷² Kummissjoni Ambjent, *The Importance of Sound Planning in Malta*: Message on the Occasion of World Town Planning Day 2019 (8 November 2019). In 2021 the Planning Authority gave the green light to the “widening of main road linking Marsalforn and Victoria [in Gozo] and the building of another road, to reduce traffic congestion, and to improve road safety and add cycle lanes.” 11, 000 square meters of ODZ land will be affected and 300 trees uprooted. See Cristina Abela, “Major road works in Gozo given green light, despite lack of studies,” *Times of Malta* (8 July 2021), <https://timesofmalta.com/articles/view/major-road-works-in-gozo-given-green-light-despite-lack-of-studies> (accessed on 8 July 2021). At the time of writing, Environment NGO Din l-Art Helwa has appealed the PA decision. See “PA approval of Marsalforn road project to be appealed,” *Times of Malta* (3 August 2021), <https://timesofmalta.com/articles/view/pa-approval-of-marsalforn-road-project-to-be-appealed> (accessed on 3 August 2021).

of some stakeholders are so diametrically opposed to each other.” In the *KA* view: “Policy-making should aim to achieve the common good. Many times, this requires positive discrimination towards vulnerable sectors and protection of the environment which is to be enjoyed by all. This also means not giving undue weight to arguments put forward by narrow-interest groups that have no regard for the common good.”

The *KA* also expressed its surprise that the policy was being reviewed by non-planners, rather than by planners within the Planning Authority: “This raises questions as to whether the Planning Authority is being divested of its policy-making function which is fundamental to its *raison d’être*.” Forward planning, in fact, was the reason for which the Planning Authority had actually been set up. The *KA* concluded that it hoped that the submissions made through the public consultation would be seriously considered, and appealed to the reviewers of the policy “not to be unduly influenced by stakeholders who have a narrow interest and who seem to be more relevant to the authorities, since these appear to listen to them more than they do to other stakeholders.”

To the authors’ best knowledge no statement was issued in 2020, most probably because the *KA* was dissolved at the time, and new members were being sought.⁷³

Consultation on Sustainable Vision for 2050

The *Kummissjoni Ambjent* also responded to a public consultation on Malta’s Sustainable Development Vision for 2050 which was carried out in November 2018. The Commission proposed that sustainable development should become part of the Prime Minister’s portfolio (since individual ministries are more focused on their own remit to respond to sustainability issues), that a bipartisan Parliamentary committee should be set up to decide on a national sustainable development strategy and its accompanying policy actions; and that the Government should make a commitment towards sustainability. According to the Environmental Commission, this might require “positive discrimination of policies to safeguard the environment and promote social wellbeing **over** shortterm economic gains,” “the Malta Council for Economic and Social Development (MCESD) evolves into the Malta Council for Sustainable Development (MCSD),” and that “consultants on matters concerning development are chosen from a cohort of persons who know what sustainable development means.”⁷⁴

⁷³ *Direttorju Ekkleżjastiku tal-Arcidjoċesi ta’ Malta u tad-Djoċesi ta’ Għawdex 2021.*

⁷⁴ *Kummissjoni Ambjent, Malta’s Sustainable Development – A Vision for 2050* (11 January

While the Environmental Commission praised the Ministry for the wide consultation exercise, it could not understand why the concepts of “carrying capacity” and “limits to growth” were not sufficiently probed (e.g. excessive use of private cars, and the sustainability of the construction industry). It also questioned whether a simple increase in the nation’s GDP was in fact leading to a sustained wellbeing of the present and future population.⁷⁵

While the Ministry had proposed four key normative governance principles for Malta’s Sustainable Development Strategy, namely, (1) long-term; (2) integration; (3) participation; and (4) reflexivity, the Environmental Commission proposed adding a fifth, that is, honesty, while pointing out certain aspects of the other principles which needed to be considered. Thus, with respect to (1), it is necessary to deal with the causes, rather than the symptoms; while recognising the need to integrate environmental, social and economic policies, the document still addresses them separately; that “participation cannot be relegated to a once-in-every-5-years approval of an electoral manifesto”; and that, with respect to 4, that a change in policy will not necessarily result in a change in behaviour unless it includes an evaluation of the past.⁷⁶

Consultation on Constitutional Reform

In November 2019, the *Kummissjoni Ambjent* also submitted its contribution to the public consultation on constitutional reform.⁷⁷ While noting that the Maltese Constitution already affirms the duty of the State “to protect and ‘conserve’ the environment and its resources both for the benefit of present and future generations ... [and] to act against pollution and environmental degradation,”⁷⁸ the Commission regrets the fact that:

2019). One needs to point out that Governments have political, multilateral commitments to reach Sustainable Development Goals.

⁷⁵ Ibid.

⁷⁶ Ibid.

⁷⁷ Kummissjoni Ambjent, *The Inclusion of Principles related to the Environment and Sustainability in the List of Fundamental Rights of the Individual in the Constitution of Malta (An initial contribution)* (1 November 2019), <https://riformakostituzzjonali.gov.mt/dokumenti/marie-therese-camenzuli-kummissjoni-interdjocesana-ambjent/> (accessed on 5 January 2021). The KA also “Lament[ed] the fact that the Committee for Constitutional Reform is made up only of representatives of the two major political parties – which is a serious affront to Maltese Civil Society, for the process should not be spearheaded by politicians...”

⁷⁸ Constitution of Malta, Chapter II (Declaration of Principles), Art. 9 (2).

Art. 21 of the Constitution also states that these principles 'shall not be enforceable in any court, but the principles therein contained are nevertheless fundamental to the governance of the country and it shall be the aim of the State to apply these principles in making laws.' The *KA* is of the opinion that the Constitution should not include romantic poetry and aspirations that are not enforceable in any court.⁷⁹

The Environmental Commission thus proposed a discussion on how these principles could be enforceable in court, auguring that a number of environmental rights would be added to the Fundamental Rights and Freedoms of the Individual (Chapter 5).⁸⁰ The Commission also recommended that "the present Office of the Guardian of Future Generations be elevated to that of an Ombudsman for the Protection of the Interests of Future Generations," and, influenced by the Constitution of the State of Pennsylvania (USA), recommended the adoption of the following statement: "Malta's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the State shall conserve and maintain them for the benefit of all the people."

Concrete Action by the Local Church

In 2017, when the national government improved the national minimum standards for homes for the elderly, the Church decided to publish a call for expression of interest for running its homes. In evaluating the six bidders, the Curia Administrative Secretary made it clear not only that the successful bidder would have to abide with the minimum standards and with national employment

⁷⁹ Kummissjoni Ambjent, *The Inclusion of Principles Related to the Environment and Sustainability in the List of Fundamental Rights of the Individual in the Constitution of Malta (An initial contribution)*.

⁸⁰ The *KA* proposed the following rights: (1) The right of present and future generations for a clean and healthy environment; (2) The right of present and future generations to be protected from adverse climatic changes; (3) The right of present and future generations for the enjoyment of the environment, including its aesthetic value, as a public good; (4) The right of present and future generations to water resources in a quality and quantity sufficient to guarantee a good quality of life; (5) The right of present and future generations for an environment that does not in any way impinge negatively on their physical and mental health and wellbeing; (6) The right of present and future generations of the inhabitants of the Maltese islands to the lawful access to all genetic resources present in the Maltese territory."

legislation, but that the Evaluation Committee would “be guided by Pope Francis’ encyclical on the environment and human ecology *Laudato si’*.”⁸¹

In 2018, reaffirming its interest in the protection of the environment, and the conservation of buildings of cultural heritage, the Church in Malta applied for, and was awarded, €2.2 million in EU funds for the conservation, protection and promotion of ecclesiastical cultural heritage.⁸² Later that year, the Archbishop’s Curia installed a PV system on its Floriana building, joining 40 other church entities (such as parishes and homes for the elderly) that were already making use of photovoltaic energy.⁸³ During the same year, the Archbishop’s Curia underwent maintenance changes including the affixing of energy-saving lamps and computer screens as part of the European Week for Waste Reduction. A Waste Management Policy was also launched for all employees of the Archbishop’s Curia for the purpose of serving as a guide in waste management.

Apart from these positive developments, however, the local Church was called to lead by example on planning and development. Four main issues will be discussed here, even though the first was not controversial and can be seen as an example of good practice.

⁸¹ Helena Grech, “Applicants for running of Church homes for elderly must respect institution’s ‘ethos,’” *Malta Independent* (12 February 2017), <https://www.independent.com.mt/articles/2017-02-12/local-news/Applicants-for-running-of-Church-homes-for-elderly-must-respect-institution-s-ethos-6736170265> (accessed on 5 January 2021).

⁸² Archdiocese of Malta Communications Office, *Archdiocese of Malta to further invest in Conservation through EU funds*. Press Release 54/2018 (8 May 2018). These funds were to be used, over a period of three years, by the archives of the Archbishop’s Curia and a total of 15 parishes to restore historical buildings and conserve cultural heritage. The importance to cultural heritage can also be seen in the fact that the restoration of the Archbishop’s Curia (Casa Manresa) façade, financed by the Archdiocese itself, was awarded the Prix d’Honneur award for architectural heritage by *Din l-Art Helwa*. <https://timesofmalta.com/articles/view/restored-curia-facade-receives-architectural-award> (accessed on 5 July 2021).

⁸³ “Church looks to the heavens for its energy. PV panels being installed on Curia roof,” *Times of Malta* (28 November 2018), <https://timesofmalta.com/articles/view/church-looks-to-the-heavens-for-its-energy> (accessed on 5 January 2021). See also “Catholic Action strengthens its commitment to environmental sustainability,” *Times of Malta* (9 June 2019), <https://timesofmalta.com/articles/view/catholic-action-strengthens-its-commitment-to-environmental> (accessed on 5 January 2021). The Malta Catholic Action installed 98 solar panels on the roof of its oratory in Mgarr, having previously installed 38 PV panels at its premises in Birkirkara.

Extending St Augustine's College

The Augustinians had set their mind to extend St Augustine College in Pietà by adding a primary school to their existing secondary school and had applied for planning permission. In 2012, MEPA's board voted against the proposal, arguing that the school should be moved to an ODZ site.⁸⁴ Later that year, however, an agreement was struck with the government to demolish the nearby old Medical School at the former St Luke's Hospital and build a primary school in its stead.⁸⁵ Yet this was not to be, for the agreement fell through following a change in government in 2013, which offered the Augustinians the former F.X. Attard Boys' Secondary School at Marsa, a dilapidated building built prior to 1968 which the Augustinians have since then rented out and refitted. This case clearly shows the possibilities that exist for schools to expand, when necessary, without having to encroach on ODZ land.

Constructing a New St Albert the Great School

The saga started when the Archbishop spoke against the decision to allow the building of a new American University on 90,000 m² of pristine land in Żonqor point. In response, the Prime Minister referred to plans to build two Church schools on 80,000 square meters of arable land in Ġhaxaq. Dr Muscat, the then Prime Minister, did not mince his words: "What's good for the goose is good for the gander. So what are people opposing the university project saying? No more building on ODZ (land), even when we need development related to education and healthcare? I will not take double standards."⁸⁶

There were, of course, considerable differences between the two proposals. Whereas the government was proposing giving unadulterated public land to foreign investors to run a private enterprise, the Church-owned land in Ġhaxaq had already been earmarked to be used exclusively for educational purposes by the 2006 South Malta Local Plan. Moreover, the Ġhaxaq site had been chosen after the school and the Planning Directorate within the Planning Authority had

⁸⁴ "Mepa Board turns down application to extend Church school," *Malta Independent* (3 February 2012), <https://www.independent.com.mt/articles/2012-02-03/local-news/Mepa-Board-turns-down-application-to-extend-Church-school-305256> (accessed on 5 January 2021).

⁸⁵ See Kummissjoni Ambjent, *Press Release about St Augustine College* (8 March 2012).

⁸⁶ Ariadne Massa, "Archbishop: We must not destroy precious agricultural land – even over Church school," *Times of Malta* (17 May 2015), <https://timesofmalta.com/articles/view/archbishop-we-must-not-destroy-precious-agricultural-land-even-over> (accessed on 5 January 2021).

studied more than 20 potential sites to ensure the least environmental impact. Nonetheless, when asked whether the Church should reconsider the plans which had been filed nine years previously when he had not yet been appointed archbishop, Mgr Scicluna argued that if other alternatives were found, precious pristine land “should not be sacrificed,” stating that “we cannot preach respect for God’s creations and then change our vision when it suits us – the Church should lead by example,” he told *The Sunday Times of Malta*.⁸⁷

A few days later, Marlene Farrugia MP wrote to the Archbishop asking him to retract the applications and seek land which has already been developed: “While I don’t have the words to thank you in the names in of the thousands of people who have been educated so impressively by Church schools over the years, I ask you to lead this country by example and promise the public that the Church will not request MEPA to sanction further development in ODZ areas.”⁸⁸ Asked for a reaction, the Curia stated that “the Archbishop will be heading a consultation process within the Church to formulate a policy to protect agricultural land both within and outside Development Zones.”⁸⁹ Reacting to this, *Front Harsien ODZ* welcomed the Church’s commitment to a land protection policy on its part, but continued:

There is still time to save this land, and the Church has an opportunity to give a powerful example to the rest of society, strengthening the environmental conscience of the nation on environmental and also ethical and moral grounds. We call on the Church to not only seriously reconsider but also relocate this project inside the development zone, or alternatively negotiate with the government to occupy one of the presently empty public schools.⁹⁰

Faced with these repeated calls to drop plans for the building of the College on virgin land, the Maltese Dominican Province defended its choice of relocating St Albert College from Valletta to Ghaxaq, maintaining both that comparisons with the plans for building a university at Żonqor were unfair, and that it “remained open to realistic proposals which may be offered to it by the

⁸⁷ Ibid.

⁸⁸ Tim Diacono, “Farrugia asks Archbishop to retract ODZ church school applications,” *Malta Today* (30 May 2015), https://www.maltatoday.com.mt/news/national/53535/farrugia_asks_archbishop_to_retract_odz_church_school_applications (accessed on 5 January 2021).

⁸⁹ Herman Grech, “Church to draw up land protection policy,” *Times of Malta* (31 May 2015), <https://timesofmalta.com/articles/view/church-to-draw-up-land-protection-policy> (accessed on 5 January 2021).

⁹⁰ “Church urged to set example on ODZ applications,” *Times of Malta* (13 June 2015), <https://timesofmalta.com/articles/view/church-urged-to-set-example-on-odz-applications> (accessed on 5 January 2021).

government, possibly in the south of Malta.”⁹¹ Reacting to this, Prof. Arnold Cassola (Alternattiva Demokratika Chairperson) said:

We welcome the Dominicans’ openness to relocate St Albert’s College beyond the previously planned Ghaxaq site. This is the real way forward. The college should be built on already disturbed land. It now becomes an urgent priority for the government to identify an area which suits such conditions.⁹²

It seems, however, that an alternative site has not been identified, and that the plan to build St Albert the Great College in Ghaxaq is still on track.⁹³ The current application, however, has a land uptake of 31500m² (much less than the original proposal) and will involve the removal of 98 trees which will be compensated – as required by law based on their ages – with the planting of 720 new trees. The site will also include a further 4500m² of land which will be retained in its current undeveloped state to accommodate educational horticultural activities.⁹⁴ One hopes, however, that the solution found for St Augustine’s College, namely, that of identifying a disused site which could be re-purposed, could also be found in this case.

The Carmelite Garden Which Was about to Become a Supermarket

In 2015, the public came to know that plans had been submitted to build a supermarket, offices and an underground three storey car park instead of the Carmelite priory garden in Balluta. Lying within the Urban Conservation Area

⁹¹ “Dominicans defend Ghaxaq site for new college – open to other government proposals,” *Times of Malta* (23 June 2015), <https://timesofmalta.com/articles/view/dominicans-defend-ghaxaq-site-for-new-college-open-to-other-government> (accessed on 5 January 2021).

⁹² AD Chairperson welcomes Dominicans’ openness to relocate St. Albert’s from planned Ghaxaq site, *Malta Independent* (24 June 2015), <https://www.independent.com.mt/articles/2015-06-24/local-news/AD-Chairperson-welcomes-Dominicans-openness-to-relocate-St-Albert-s-from-planned-Ghaxaq-site> (accessed on 5 January 2021).

⁹³ Kevin Schembri Orland, “New 700 student St Albert The Great College planned for Ghaxaq,” *Malta Independent* (11 June 2020), <https://www.independent.com.mt/articles/2020-06-11/local-news/New-700-student-St-Albert-The-Great-College-planned-for-Ghaxaq> (accessed on 5 January 2021). This article gives a good overview of the project as envisioned. See also, James Debono, “Church Order resurrects Ghaxaq college plans with reduced campus size,” *Malta Today* (10 June 2020), https://www.maltatoday.com.mt/environment/townscapes/102888/church_order_resurrects_ghaxaq_college_plans_with_reduced_campus_size (accessed on 5 January 2021).

⁹⁴ Kevin Schembri Orland, “New 700 student St Albert The Great College planned for Ghaxaq.”

of St Julian's, this was among the last green spaces in the area, and would lie next to the Carmelite priory and close to the Carmelite Parish Church, which were scheduled as Grade 2 and Grade 1 buildings, respectively, by the Planning Authority. Interestingly, the Cultural Panel of the Planning Authority found no objection to the development, while the Superintendence of Cultural Heritage declined to pronounce itself until it had more information. While residents had collected nearly 400 signatures petitioning against the development, being concerned mainly with traffic congestion, the proposal found its most ardent opponent in the Archbishop who was "dead set against" the development. In his words, "A garden should be a garden and should not be used for other things."⁹⁵

The Archbishop proved his mettle and in July 2015, through Dr Michelle Tabone LLD, requested the Court to issue an inhibition order to stop the Carmelites and the developer from proceeding with the development. The request was based on the fact that the 50 year lease agreement between the Carmelite Order and the developer was signed in 2011 when the Carmelite prior at Balluta was the developer's brother, and that this private contract allegedly breached the conditions of the original donation of the land to the Carmelites. Judge Caruana Demajo acceded to the request on a *prima facie* case of a right to protect, and issued a temporary order until a final decision could be made.⁹⁶

The controversial commercial development, including an 84 space car park, was rejected by the Planning Authority in March 2017, and an appeal was similarly rejected in December 2018. Undeterred, in 2019 the developer filed a new application for a 115 space car park, citing Local Plan policies promoting the introduction of car parks and pedestrianization schemes, as well as the recent approval of a new multi story car park proposed by the Sliema Local Council. Notwithstanding a judicial protest filed by the Carmelites against the developer and the Planning Authority – arguing that they had not consented to the new application, and the Planning Authority's rejection of the earlier application "had automatically cancelled any written agreement that may have existed between the parties"⁹⁷ – the Planning Authority decided to continue processing

⁹⁵ Caroline Muscat, "Archbishop 'dead set against' plan for priory supermarket," *Times of Malta* (9 August 2015), <https://timesofmalta.com/articles/view/archbishop-dead-set-against-plan-for-priory-supermarket.579831> (accessed on 5 January 2021).

⁹⁶ "Archbishop intervenes to stop Carmelites' contract," 15 September 2015, <https://www.tvn.com.mt/en/news/archbishop-intervenes-to-stop-carmelites-contract/> (accessed on 5 January 2021).

⁹⁷ James Debono, "Carmelite Order denies giving developer consent for car park in Balluta," in *Malta Today* (9 May 2019), <https://www.maltatoday.com.mt/environment/townscapes/94879/>

the application on the 2011 lease agreement, and approved the application in February 2020.⁹⁸

Consequently, both the Carmelites and the Archbishop, in his capacity as administrator of ecclesiastical entities, appealed to the Environment and Planning Review to revoke the permit, on the grounds that the application did not have the consent of the land's owners, that the private agreement signed between the two brothers in 2011 was allegedly in breach of the original contract donating the land to the Carmelite Order, and on grounds of planning policy, including those of safeguarding gardens in urban conservation areas and legal obligations to protect trees which were more than fifty years old. The appeal is still pending.

Augustinian Property in St George's Bay

In June 2018, *Malta Today* ran a story outing a rental agreement between the Augustinians and the owners of the Bay Street complex, sarcastically writing that: "Mendicant Orders tend to adopt a lifestyle of poverty, but Malta's Augustinian Order knows better than to ignore the property gold rush on St George's Bay."⁹⁹ The Augustinians had in fact rented a 2260 m² open area adjacent to their priory, at the time being used as a makeshift car park, to be developed into a 12 storey hotel and office complex, including 246 underground parking spaces.

Archbishop Scicluna asked the Environment Commission to draw up a report which they published on 5 October 2018.¹⁰⁰ The scathing report concluded that the proposed development infringed on planning policies; is excessive and encroaches on residents, while being unreasonably close to the priory, a Scheduled Grade 2 building. If any development were to take place on this site, the Commission argued that:

carmelite_order_denies_giving_developer_consent_for_car_park_in_balluta (accessed on 5 January 2021).

⁹⁸ James Debono, "Archbishop: Balluta monastery car park sacrilegious creation replacing God's greatness," *Malta Today* (13 February 2020), https://www.maltatoday.com.mt/environment/townscapes/100293/archbishop_balluta_monastery_car_park_sacrilegious_creation_replacing_gods_greatness (accessed on 5 January 2021)

⁹⁹ Matthew Vella, "Augustinians rent out St George's Bay land to Bay Street for 12-storey hotel extension," in *Malta Today* (6 June 2018), https://www.maltatoday.com.mt/environment/townscapes/87318/augustinians_rent_out_st_georges_bay_land_to_bay_street_for_12storey_hotel_extension (accessed on 5 January 2021).

¹⁰⁰ Kurt Sansone, "Augustinian Order receives flak from Church's Environment Commission," *Malta Today* (5 October 2018), https://www.maltatoday.com.mt/news/national/89954/augustinian_order_receives_flak_from_churchs_environment_commission (accessed on 5 January 2021).

this should take place within a public consultation exercise that determines the optimal use of such a site, and not exclusively in terms of future revenue streams for the owners, but in terms of the future benefits that can accrue to the Paceville/Swieqi communities and visitors to the area.¹⁰¹

Moreover, the proposed development, the Commission pointed out, also highlighted the need for “a total review of the Local Plan that incorporates these areas” and, since the commission had already made this proposal several times, the Commission “once again appeals to the authorities to undertake such a review as a matter of urgency.”¹⁰²

But, as an opinion writer on a local newspaper put it, the issue has less to do with the Planning Authority’s approval for there was nothing new in that the Authority had “sold its soul to the speculators’ lobby”; “the real scandal in this story are the actions of the Augustinians.”¹⁰³ While their actions were not illegal, and indeed would not have raised an eyebrow 50 years ago, “the Church in Malta is now far more sensitive to its environmental responsibilities, not only in terms of its preaching but, more importantly, in terms of its own actions ... In recent years its Environmental Commission has been boldly speaking inconvenient truths to both state and private power. Archbishop Scicluna has set new standards for the sale and use of Church property, especially on ODZ land.”¹⁰⁴

The author of this mordacious article thus argues that what was so objectionable in the Augustinians’ actions was that “firstly, they knowingly bypassed the Archbishop’s standards by leasing, rather than selling outright, their land, thus making a mockery of the Church’s principled stand on land use,” and, “secondly, they completely ignored the Church’s Environmental Commission’s report that condemned the lease in no uncertain terms.”¹⁰⁵

Though the Religious Order justified its actions as a way of funding their religious, social and educational programmes, the author not only argues that they have actually “aided and abetted” environmental degradation whose effects will be experienced by their own parishioners, but raises a number of questions:

¹⁰¹ *Report by the Church Environment Commission on St Rita Priory Site Project*, Archdiocese of Malta Communications Office, 5 October 2018.

¹⁰² *Ibid.*

¹⁰³ Sandro Spiteri, “The price of saving souls,” *Times of Malta* (10 February 2019), <https://timesofmalta.com/articles/view/the-price-of-saving-souls-sandro-spiteri> (accessed on 5 January 2021).

¹⁰⁴ *Ibid.* It should be clear that the development in question does not fall in an ODZ area.

¹⁰⁵ *Ibid.*

How, exactly, will they explain Pope Francis' *Laudato si'* to their parishioners in the shadow of the 12-story blank wall they and their children will have to put up with?

How, exactly, will they teach environmental sustainability in their schools they will be funding by the proceeds of this umpteenth priapic pillage?

How, exactly, will they teach that financial gain that undermines the common good does not justify the funding of good works?

Here lies the real scandal. By their Paceville land lease, the Augustinians have deepened the Maltese chasm between personal piety and social justice.¹⁰⁶

Seasons of Creation

The Season of Creation runs from 1st September to 4th October every year. For the Orthodox Church, the former marks the beginning of the ecclesiastical calendar and, in 1989, Ecumenical Patriarch Dimitrios I, proclaimed it a day of prayer for the protection of the environment. On the other hand, the Catholic Church commemorates St Francis of Assisi – known for his *Canticle of the Creatures* – on 4th October (having died on 3rd October 1226), and, in 2015, Pope Francis choose 1st September as a World Day of Prayer for Care of Creation for the worldwide Roman Catholic Church as well.¹⁰⁷ Though the first season ran in 2016, the local Church celebrated the first Season of Creation in 2017.¹⁰⁸ While prayers for creation were offered in all Churches in Malta and Gozo on 1st September, Archbishop Scicluna launched the season by celebrating a Solemn Mass at St John's Co-Cathedral, Valletta, on Saturday 2nd September,¹⁰⁹ and the period was closed by Bishop Mario Grech who celebrated a Mass at the Conventual Franciscan Church in Republic Street, Valletta, on Sunday 1 October.¹¹⁰

¹⁰⁶ Ibid.

¹⁰⁷ Letter of His Holiness Pope Francis for the Establishment of the "World Day of Prayer for the Care of Creation" [1st September]. 6 August 2015. https://www.vatican.va/content/francesco/en/letters/2015/documents/papa-francesco_20150806_lettera-giornata-cura-creato.html (accessed on 5 January 2021).

¹⁰⁸ <https://church.mt/the-2017-season-of-creation/> (accessed on 5 January 2021).

¹⁰⁹ <https://church.mt/there-are-human-activities-under-the-guise-of-hobbies-sport-and-progress-that-destroy-creation-on-a-whim-and-with-abandon-the-archbishop-at-the-beginning-of-the-month-of-creation/> (accessed on 5 January 2021).

¹¹⁰ <https://church.mt/closing-of-the-2017-season-of-creation/> (accessed on 5 January 2021).

On this occasion, the *Kummissjoni Ambjent* published a position paper on *Respect for life in all its aspects*,¹¹¹ inspired by some thoughts from *LS*. The Commission argued that one should not only protect the vulnerable life of animals and plants or trees, but also human life, particularly in its very early stages. The environmental impact of the construction industry should be given the importance it deserves and the Planning Authority should do more than simply process development applications. Against the objections of some within the commercial sector, the *KA* pointed out that true development goes beyond financial gain and should safeguard the quality of life and dignity of all, including the dignity of workers (including minimum wage, maternal leave, sick leave, employment of people with special needs, etc).

During the 2017 Season, the *KA* also teamed up with Nature Trust Malta to mark the season with a visit to Xrobb l-Għagin Nature Park and Sustainable Development Centre;¹¹² a photographic exhibition in Gozo during the month of September; and a public meeting entitled “*Laudato si’*: Interfaith and Secular perspectives on the care for creation.”¹¹³ This meeting included speeches by representatives of the Christian, Jewish and Muslim faith, as well as representatives of environmental NGOs, while also being addressed by the President of Malta Marie-Louise Coleiro Preca, the Apostolic Nuncio to Malta Mgr Alessandro D’Errico,¹¹⁴ the Vicar General of the Archdiocese of Malta Mgr Joseph Galea Curmi,¹¹⁵ and by the European Commissioner for the Environment, Karmenu Vella. Held at the Millennium Chapel (St Julian’s) on October 4th, this meeting preceded the international conference “Our Ocean,” convened by the European Union on 5th and 6th October in St Julian’s.

In the Season of Creation Message for 2018 the Environmental Commission decided to focus on waste, especially because of its impact on the quality of underground water as well as on biodiversity in the sea.¹¹⁶ While it is very easy to be discouraged in the face of the scale of the environmental problem, the Commission decided to focus on the “little daily actions” (see *LS*, 211)

¹¹¹ Kummissjoni Ambjent, Position Paper: *Rispett lejn Il-Hajja fil-forom kollha tagħha* (30 September 2017).

¹¹² Held on 24 September at 9am, this included a talk on *Laudato si’* by Prof. Paul Pace of the University of Malta.

¹¹³ <https://church.mt/closing-of-the-2017-season-of-creation/> (accessed on 5 January 2021).

¹¹⁴ <https://church.mt/speeches-by-the-apostolic-nuncio-and-the-vicar-general-on-the-closing-of-the-season-of-creation/> (accessed on 5 July 2021).

¹¹⁵ *Ibid.*

¹¹⁶ Kummissjoni Ambjent, *Message on the Season of Creation 2018* (13 September 2018), <https://church.mt/season-of-creation-2018/> (accessed on 5 July 2021).

which can bring about real change. It thus focused its message specifically on the *Reduce, Reuse, Recycle* framework since this offers persons of good will the opportunity to do their part in a concrete way, for “whoever is faithful in very little is faithful also in much ...” (see Luke 16:10). The Commission pointed out that waste reduction is the most effective way to tackle waste, and pointed out that it was eagerly waiting for the political framework on single use plastic being developed by ERA for public consultations. It also highlighted local endeavours and Facebook groups which promoted reuse of unwanted objects, while calling on citizens to cooperate with authorities and waste management agencies. The year’s season came to an end with a mass celebrated by Mgr Galea Curmi. Children, he insisted in his homily, should inherit a country where creation is taken care of and respected, reminding his audience about the message on waste management by the *KA* as well as the Pope’s message on water on 1st September of that year.

The 2019 Season of Creation was opened on Tuesday 3rd September with the celebration of a Mass and a public talk by Prof. Carmel Agius on the charm of life on the seabed of Xghajra and the connection it has with local people.¹¹⁷

In its statement for the 2019 season of creation, the *KA* issued the statement *True Respect and Genuine Care for All Creation*, focusing on some examples of greenwashing which the Commission had witnessed in its sixteen years of operation, that is, “the practice of making unsubstantiated or misleading claims about the environmental benefits of a project in order to make it appear more environmentally friendly than it really is.”¹¹⁸ In its statement, the Commission highlighted a number of local examples in the previous sixteen years since it had been set up.

The *KA* is highly critical of the appeal to scientific studies to justify certain developments, arguing that serious scientific studies publish not only their results but also their methodology, which allows greater scrutiny and better decisions. Unfortunately, the Report on the Construction Industry and the Property Market in Malta (2017) has remained unpublished, as well as all the studies related to the tunnel between Malta and Gozo, and those of the Central Link Project. The Commission argued that citizens have a right (not a privilege)

¹¹⁷ Archdiocese of Malta Communications Office, Press Release *Fruh tax-Xabar tal-Holqien* 2019 (30 August 2019). [https://ms.maltadiocese.org/WEBSITE/2019/PRESS RELEASES/88 IX-XAHAR TAL-HOLQIEN.pdf](https://ms.maltadiocese.org/WEBSITE/2019/PRESS%20RELEASES/88%20IX-XAHAR%20TAL-HOLQIEN.pdf) (accessed on 5 July 2021).

¹¹⁸ Kummissjoni Ambjent, *Stqarrija Imhabba Vera u Rispett Sinċier lejn il-Holqien* (23 September 2019). For a synopsis in English, see <https://church.mt/true-respect-and-genuine-care-for-all-creation/> (accessed on 5 July 2021).

to access these reports irrespective of whether they have been paid for by private or public funds.

Moreover, though decision makers need to consult experts, expert advice should defend the interests of the people, and the people's voice should never be completely side-lined when decisions are taken. The Commission is highly cynical about projects being approved after the original plans are redesigned to "minimise" environmental harm; of plans for large projects being submitted in phases; of justifying tree removal because more will be planted elsewhere; or of so-called Green Corridors which might lead to more development in ODZ. The statement also scolds Church entities which have created environmental harm, or which have sold or leased land for irresponsible development on the premises of "pastoral needs." The Commission also points out procrastination in taking urgent action (for example, on single use plastic, and adopting the polluter pays principle) also as a way of bringing justice for those producers and importers who have already invested in sustainable alternatives. The statement also questions whether studies have been done to find out the Islands' "carrying capacity" – that being pro-business is not enough if this does not lead to better welfare; and appeals to environmental activists not to let their voice be hijacked by partisan politics.

In 2020 the Season of Creation was commemorated by circulating a letter by the Council of European Bishops Conferences (CCEE) and the Conference of European Churches (CEC). This letter focused on Jürgen Moltmann's observation that humankind relates with nature through "nihilism" which must be replaced with a "discernment of the God, who is present in creation through his Holy Spirit," and which "can bring men and women to reconciliation and peace with nature."¹¹⁹ The letter acknowledges the new awareness that the pandemic has brought of a more interconnected world, and a greater need to be sensitive to the ongoing "environmental devastation and the threat of climate change." Finally, it calls on European dioceses to celebrate the Season of Creation utilising the concept of Jubilee for the Earth, which "points us towards the need to restore balance in the very systems of life, affirming the need for equality, justice, and sustainability and confirming the need for a prophetic voice in defence of our common home."¹²⁰

On 1st September 2020, the day dedicated to Creation, in his daily homily during mass celebrated from the Archbishop Curia's chapel, Mgr Charles J.

¹¹⁹ Christian Krieger and Angelo Bagnasco, "Season of Creation: Jubilee for the Earth." <https://church.mt/season-of-creation-jubilee-for-the-earth/> (accessed on 5 July 2021).

¹²⁰ Ibid.

Scicluna called on one and all to safeguard the environment, to avoid uprooting trees unnecessarily, and even to plant new ones, since this would also be enjoyed by future generations and because it is also symbolic of one's commitment to the environment.¹²¹ There were no public events held during this season due to restrictions related to the Covid-19 pandemic, and the dissolution of the *Kummissjoni Ambjent*.

Concluding Remarks

This article has sought to document the environmental concerns of the local Church and their context. Though not offering an in-depth critical analysis of the documents which were presented, this preliminary study is a first step in that direction. It is hoped that the collation of this information allows readers to familiarise themselves with the statements and proposals done by the Church in Malta. Summarising the various statements and proposals in one place, allows past proposals to be re-presented and re-proposed, while allowing new proposals to be made.

This study also makes it possible to see which issues have been at the forefront, and which ones might not have been a pressing concern till now. It is clear for example, that many of the proposals are related to construction and planning. It is alarming for example to learn that only 1% of plastic utilised in Malta has been recycled in 2019.¹²² There is also scarce concern on climate change and the reduction of carbon emissions through changes in consumer behaviour. Future statements ought, no doubt, to focus on water conservation and desertification, loss of habitat and extinction of species, aquaculture production and possible related environmental degradation, local and seasonal food consumption or excessive consumption of meat and its environmental concerns, amongst other issues.

One ought to point out that the Maltese Episcopal Conference has reconstituted the *KA* by a decree on 20 May 2021. The authors would, however, recommend that the Interdiocesan Environmental Commission may be amalgamated with the Commission for Peace and Justice to form an Interdiocesan Commission for Integral Ecology. This is not only because some

¹²¹ Charles J. Scicluna, "Naghmlu eżami tal-kuxjenza fuq il-harsien tal-holqien – L-Arċisqof" <https://knisja.mt/naghmlu-ezami-tal-kuxjenza-fuq-il-harsien-tal-holqien/> (accessed on 5 July 2021).

¹²² Jessica Arena, "Only one per cent of Malta's plastic waste was recycled in 2019," *Times of Malta* (1 February 2021).

environmental issues are related to the question of justice, but also since it would more adequately reflect the Church's action in favour of the integral ecology which *Laudato si'* calls for.

It would be naïve to think that all these proposals, or at least a majority of them, have been taken up and implemented.¹²³ Man's sinful nature requires the Church's prophetic voice to call for eco-conversion. However, in the words of the local bishops, "today more than ever, the Church needs to lead by example."¹²⁴

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¹²³ For example, did the local Church actually acquire ISO certification? Are parishes actually cooperating with local councils to protect the local environment? How were principles of *LS* utilised to evaluate the bidders who applied to run the Church's homes for the elderly?

¹²⁴ Charles J. Scicluna, Mario Grech, Joseph Galea-Curmi, Pastoral Letter, *Building Our Houses On A Rock* (3 September 2018).