

# Developing a Sustainable Diving Industry in the Maltese Islands

A STRATEGY FOR THE FUTURE 2022



GOVERNMENT  
OF MALTA

MINISTRY FOR TOURISM  
MINISTRY FOR GOZO



**Malta**  
Tourism Authority



# 1. CONTENTS

<b>1. Introduction .....</b>	<b>4</b>
Scope.....	4
Stakeholder Involvement.....	5
<b>2. Situation Analysis .....</b>	<b>7</b>
Overview of the Diving Industry In Malta.....	7
Status of the Industry Pre-COVID-19 Pandemic .....	7
Current Status of the Industry Emerging from the COVID-19 Pandemic .....	9
Outlook of the Industry Emerging from the COVID-19 Pandemic .....	10
Challenges for the Diving Industry.....	10
Way Forward for the Diving Industry .....	11
Profile of the Diving Tourist in Malta.....	12
The Diving Product in Malta .....	13
Shore Diving .....	14
Boat Diving .....	16
The Diving Industry and Diving Regulation .....	18
The Diving Industry and Environmental Regulation .....	22
International Designations - Marine Protected Areas, Special Conservation Areas, Special Protection Areas, and Natura 2000 Sites .....	22
Local Designations .....	23
European Marine Strategy Framework Directive .....	23
Malta as a Competing Dive Destination .....	27
Industry Gap Analysis .....	27
Key Issues .....	27
<b>3. Strategic Objectives for a Sustainable Diving Industry .....</b>	<b>33</b>
Way Forward for the Diving Industry .....	33
Strategic Objectives.....	34
<b>4. Strategy Implementation .....</b>	<b>47</b>
Implementation Plan.....	47
Implementation Responsibilities.....	47

# 1. INTRODUCTION

The Malta Tourism Authority (MTA), the Ministry for Tourism (MTF), and the Ministry for Gozo (MGOZ) have embarked upon a process to update the Diving Master Plans for Malta and Gozo. Adi Associates Environmental Consultants Ltd have been entrusted with the preparation of a Strategy for the future development of the diving industry in the Maltese Islands, hereinafter referred to as 'the Strategy'.

The initial work on the update and preparation of the Strategy commenced prior to the onset of the COVID-19 pandemic, but the work was then put on hold. The preparation of the Strategy was reactivated in the first quarter of 2021. Surveys of the main shore dive sites were conducted to inform the Strategy; these surveys were updated in June / July 2021. It is acknowledged that the MTA and the MGOZ have subsequently undertaken a number of interventions at certain of the shore dive sites since that time.

The Strategy updates and supersedes the ***Masterplan to Support a Sustainable Diving Industry in Malta***<sup>1</sup>, adopted in 2011, as well as the 2006 ***Diving Masterplan for Gozo and Comino***<sup>2</sup>, which was never formally adopted.

A strategy for the sustainable development of the diving industry is timely, with the launch of Malta's new Tourism Strategy for the period 2021 - 2030<sup>3</sup>. The Tourism Strategy aims to manage and formulate the future development of tourism to Malta in line with sustainability principles, including through strategies aimed at making the best use of the islands' natural attractions and enhancing those tourism market segments in which Malta possesses a competitive advantage, such as diving tourism.

## Scope

The Strategy outlines a framework to guide the sustainable development of the diving industry in Malta, and in line with the guiding principles of the new Tourism Strategy. The COVID-19 pandemic has critically affected the diving industry globally, and the impacts of the pandemic on diving tourism in Malta are still being felt at the time of the drafting of this Strategy. The Strategy has been developed following an evaluation of the current status of the diving industry in Malta, as well as a review of the status pre-pandemic, and an analysis of how the industry should now be targeted as the industry slowly emerges from the pandemic.

The Strategy takes account of what are considered to be the current and emerging international trends and what is needed to enhance Malta's competitiveness in the Mediterranean region, and globally, as the industry recovers from the pandemic.

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1 Masterplan to Support a Sustainable Diving Industry in Malta, 2011. Malta Tourism Authority

2 Diving Masterplan for Gozo and Comino (2006). Ministry for Gozo

3 Recover Rethink Revitalise Malta Tourism Strategy 2021-2030. Malta Tourism Authority

In line with the Tourism Strategy, the Strategy for the diving industry aims to recover the losses inflicted by the COVID-19 pandemic, whilst outlining a framework of actions to strengthen the industry based on the principles of sustainability. Additionally, the Strategy has been developed after a period of critical reflection of the strengths and weaknesses of the industry, afforded by the pandemic, and a recognition of what is necessary to enhance the competitiveness of the diving industry. The importance of diving tourism in contributing to the recovery of tourism generally, and Malta's competitive advantage globally, have also been key considerations.

The Strategy includes an Implementation Plan, with actions designed to implement the Strategy in the short-term, as well as the measures appropriate for guiding the longer-term development of the industry.

The focus of the Strategy is recreational diving, especially as practised by tourists visiting Malta on a diving holiday and tourists who include a dive(s) as one of their activities whilst on holiday.

It is acknowledged that there is a growing interest in more technical diving in Malta, attracting experienced divers with specific interest in diving at depth<sup>4</sup>. Prior to the COVID-19 pandemic, technical diving was a relatively small element of the industry, although interest had been growing. Particularly as Malta emerges from the pandemic, the diving industry in Malta considers technical diving to present one of the most important opportunities for product diversification, serving to enhance Malta's competitiveness in the European market, in particular, and likely to also increase Malta's attraction amongst recreational divers.

Accordingly, the Strategy addresses technical diving in the context of product diversification in the shorter rather than the longer-term. However, the Strategy envisages further analysis and the preparation of a specific, stand-alone strategy, or policy paper, for what is a very specific market with considerably different needs to the recreational diving market. The Strategy document provides an analysis of Malta's diving industry prior to the onset of the COVID-19 pandemic and currently, as the islands emerge from the pandemic. In this context, the Strategy outlines:

- An overview of Malta's recreational diving product, examining, and including the status and quality of the existing shore and boat dive sites and industry regulation;
- A gap analysis, identifying the current shortcomings of Malta's diving industry, including with regard to future trends internationally;
- The strategic objectives for Malta's diving industry, to address the current issues and the challenges going into the future; and
- An Implementation Plan, with the specific actions required to ensure the sustainability of Malta's diving industry.

#### **Stakeholder Involvement**

It is critical that the Strategy has key Government support to ensure the implementation of the measures identified, where these address the land use, environmental, and transportation considerations necessary in the designation and improvement of the dive sites and in managing the direction taken for the diving industry.

<sup>4</sup> At depths below 50 m, where there is a requirement for the use of mixed gases

Development of the Strategy involved consultation with the Planning Authority (PA), the Environment and Resources Authority (ERA), Transport Malta (TM) – Ports and Yachting Directorate, the Department of Fisheries and Aquaculture, and the Centre for Maritime Archaeology, as well as the MTA and the MGOZ. These entities were involved in the initial discussions on the status and form of the Strategy document, held before the COVID-19 pandemic, and were consulted on the Strategy, including the Implementation Plan.

There was also consultation with the Professional Diving Schools Association (PDSA), the Federazzjoni ta I-Ghaqdiet tas-Sajjeda Dilettanti Malta, the Federation of Underwater Activities Malta, and the Malta Skin Diving Club.

Finally, the Strategy has been informed by responses to a questionnaire circulated to Malta's diving industry over the period June and July 2021. The purpose of the questionnaire was to gauge opinions on the status of the industry following the impact of the COVID-19 pandemic and how best to move the industry forward as Malta emerges from the pandemic.

Respondents were asked to identify the current strengths and weaknesses of the diving industry and the priority measures / actions required to support the industry and to enhance Malta's competitiveness post-pandemic, including in respect of diversification. Respondents were also asked to comment on the condition and quality of the infrastructure and facilities available at shore and boat dive sites in Malta and Gozo.



## 2. SITUATION ANALYSIS

### Overview of the Diving Industry In Malta

At the time of writing this Strategy, the diving industry in Malta continues to feel the effects of the COVID-19 pandemic. Dive tourist numbers remain lower than the pre-pandemic levels, although there has been a significant increase in the numbers of dive tourists to Malta since the lifting of COVID-19 restrictions across Europe in particular.

As Malta emerges from the pandemic, there are signs that the Islands will continue to be attractive dive destinations, and that the key features that sold Malta pre-pandemic will remain important for the recovery of the diving industry post-pandemic.

The pandemic has served to highlight the importance of enhancing Malta's competitiveness on a European and global scale, however this requires a focus on those features of interest on which the industry previously relied, as well as consideration of how the industry should develop and diversify, to ensure that it is safeguarded and sustained going into the future.

Malta's main attributes, and pulls for dive tourists, have been (and are likely to remain) its warm waters, good visibility, and the spectacular underwater scenery. An additional attraction is considered by divers to be the close proximity of the dive sites, and their variety, as well as the potential to combine diving with other activities, particularly beneficial for visitor groups including those who don't dive, or who aren't fanatic divers. This attraction too is likely to remain a pull for dive tourists.

### Status of the Industry Pre-COVID-19 Pandemic

Over the recent decade, the diving industry has become an important driver for Malta's tourism sector. Prior to the onset of the COVID-19 pandemic, there were an increasing number of divers from overseas and the number of local divers had also been increasing. The Islands' dive attractions were serving to promote Malta as one of the top dive destinations in the world.

In the 2019 Scuba Travel poll of the top ten dives in Europe, Malta featured twice, with Cirkewwa at number three and the Blue Hole in Gozo at number five<sup>5</sup>. In the global ranking of the top 100 dives<sup>6</sup>, Cirkewwa ranked 66<sup>th</sup> and the Blue Hole ranked 97<sup>th</sup>.

**Table 2.1** illustrates the number of dive tourists visiting Malta over the period 2016 to 2019, as in the number of inbound tourists visiting Malta specifically for diving<sup>7</sup>. **Table 2.2** illustrates

5 <http://www.scubatravel.co.uk/topdiveseurope.html>. Website accessed July 2019

6 <http://www.scubatravel.co.uk/topdiveslong.html>. Website accessed July 2019

7 Source: The Profile of Diving Travellers in Malta 2019 (September 2020) Malta Tourism Authority

the number of inbound tourists engaging in diving when visiting Malta<sup>8</sup>.

In 2019, the number of inbound tourists who came to Malta specifically for diving represented 4.8% of the total number of visitors. The percentage of visitors who engaged in diving when visiting Malta in 2019 was 6.5%. This was an increase in the number who engaged in diving in 2010 (4.8%) but a decrease from 2016 (7.3%). Approximately 30% of divers using licensed dive centres in 2019 were repeat clients<sup>9</sup>.

**Table 2.1: Tourists Visiting Malta for Diving (2016 – 2019)**

	2016	2017	2018	2019
Total inbound tourists	1,965,928	2,273,837	2,598,690	2,753,240
Number of tourists visiting Malta to dive	101,700	117,300	127,350	131,382
Share of total inbound tourists (%)	5.2	5.2	4.9	4.8

Source: The Profile of Diving Travellers in Malta in 2019 (September 2020). Malta Tourism Authority

**Table 2.2: Tourists Engaging in Diving When Visiting Malta (2010 – 2019)**

	2010	2015	2016	2017	2018	2019
Total inbound tourists	1,338,840	1,783,364	1,965,928	2,273,837	2,598,690	2,753,240
Number of tourists who dived during their stay	64,300	113,322	142,800	155,300	169,850	177,645
Share of total inbound tourists (%)	4.8	6.4	7.3	6.8	6.5	6.5

Source: The Profile of Diving Travellers in Malta in 2019 (September 2020). Malta Tourism Authority

There had been a steady increase in the numbers of the more fanatic divers visiting Malta in the years prior to the onset of the pandemic. However, the broader profile of dive tourism saw the majority of tourist-related diving arising in the case of tourists trying diving, possibly for the first time, and where diving was just one of a number of activities undertaken during their stay in Malta.

In 2019, the island of Malta was the more popular destination, compared to Gozo and

<sup>8</sup> Ibid.

<sup>9</sup> Source: Performance of the Diving Industry in Malta 2019 (May 2020). EMCS



Comino. In 2019, approximately 13% of diving tourists only dived in Gozo<sup>10</sup>. Research undertaken for the PDSA revealed that in 2019 Gozo was particularly attractive to divers from the French and German markets<sup>11</sup>.

Malta's main source market pre-pandemic was Europe. Hence, Malta has tended to compete primarily with other European diving destinations, although Egypt / Red Sea had attracted significant numbers of dive tourists from Europe, despite the political instability in the region. The Maldives was also an attractive destination for European divers pre-pandemic.

Pre-pandemic, the main competitor markets for Malta globally were:<sup>12</sup>

- Egypt / Red Sea;
- The Maldives;
- Cyprus;
- Greece;
- Spain (including the Balearic and Canary Islands);
- Portugal (including Madeira and the Azores);
- Italy (including Sardinia and Sicily);
- Croatia; and
- Turkey.

Diving in Malta pre-pandemic was highly seasonal. In 2019, the majority of divers travelling to Malta specifically for diving visited during the peak summer months of July to September (61%)<sup>13</sup>. Approximately 21% visited in the period April to June, approximately 15% during October to December, and only approximately 3% of divers visited during January to March.

#### **Current Status of the Industry Emerging from the COVID-19 Pandemic**

With Malta still emerging from the COVID-19 pandemic, there is a relative lack of quantitative information available on the current state of the industry. Furthermore, the state of the industry is quickly evolving, as COVID-19 restrictions are being lifted world-wide. Research carried out for the PDSA in May 2020 reveals the impacts on Malta's diving industry in the opening months of the pandemic (in the period March to July 2020) and covering the first national shut down<sup>14</sup>.

The average loss of earnings of dive centres for the periods March to July and August to

<sup>10</sup> Source: The Profile of Diving Travellers in Malta 2019 (September 2020) Malta Tourism Authority

<sup>11</sup> Source: Performance of the Diving Industry in Malta 2019 (May 2020). EMCS

<sup>12</sup> Information derived from discussions with the Professional Diving Schools Association Malta

<sup>13</sup> Source: The Profile of Diving Travellers in Malta 2019 (September 2020) Malta Tourism Authority

<sup>14</sup> Source: The Impact of Covid-19 on the Diving Industry in Malta 2019 (May 2020). EMCS

September 2020 was anticipated to likely amount to €47,125 and €51,200, respectively<sup>15</sup>. The losses were expected to vary between centres, with, at the time of the survey, 43% anticipating losses of between €20,000 and €40,000 in the period March to July, 51% anticipating losses of between €20,000 and €60,000 in the period August to September, and close to a third indicating losses in excess of €60,000 in both periods. 70% of the dive centres indicated their need to refund confirmed bookings for 2020.

As 2020 and 2021 progressed, with there being a second, more protracted shut down, the situation for the diving industry became more acute. This period in particular saw the loss of a substantial proportion of the industry's employees, where dive centres are significantly reliant on foreign staff (especially diving instructors). In general, the dive centres have lost over 50% of their employees as a result of the COVID-19 restrictions<sup>16</sup>.

The impact of Brexit, in restricting freedom of movement between the UK and Malta<sup>17</sup>, has coincided to exacerbate the employment situation, where the UK has traditionally served as the primary recruitment base for Malta's dive centres.

Since the diving industry has opened up, there has been a steady increase in inbound dive tourists, with an estimated 25% improvement in turnover compared to 2020<sup>18</sup>, although turnover is not yet back to pre-pandemic levels.

The launch of the MTA-sponsored €100 voucher scheme for diving tourists, in June 2021<sup>19</sup>, was recognised by the industry as being an important inducement to the recovery of the industry. Government assistance to dive centres through the wage supplement scheme introduced in 2020 has also been important, in allowing centres to retain staff.

#### **Outlook of the Industry Emerging from the COVID-19 Pandemic Challenges for the Diving Industry**

Prior to the onset of the COVID-19 pandemic, the industry had identified the constraints that were then considered to potentially impact the long-term growth of Malta's diving industry<sup>20</sup>. Unsustainable fishing practices and a poor marine environment were identified as the primary challenges, followed by low levels enforcement of regulations, and issues related to access to, and the infrastructure and facilities available at, dive sites (EMCS, 2019).

As Malta emerges from the pandemic, it is clear that these challenges remain relevant,

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15 Ibid.

16 Information derived from discussions with the Professional Diving Schools Association Malta in October 2021

17 Freedom of movement restrictions came into force on 1st January 2021

18 Information derived from discussions with the Professional Diving Schools Association Malta in October 2021

19 Announced in April 2021

20 Source: Performance of the Diving Industry in Malta 2019 (May 2020). EMCS

and of similar priority. Responses from the industry questionnaire conducted in June / July 2021 highlight the same major challenges and concerns. Over half of the respondents to the questionnaire (61%) identified threats to the marine environment (from overfishing / inappropriate fishing methods and from construction / other coastal activities) to be the biggest challenge for Malta's diving industry.

Almost a quarter of respondents (21%) identified the lack of awareness of the importance of conserving marine life, and of the relationship of this to the diving industry, as being a significant weakness.

Issues with the management and regulation of the industry, including in relation to the infrastructure and facilities available at dive sites were also identified as major challenges as the industry emerges from the pandemic.

The majority of the respondents (95%) rated the condition and quality of the infrastructure and facilities available at shore dive sites on Gozo as being of between 3 Star and 1 Star quality; 82% rated the condition and quality of the infrastructure and facilities available at shore dive sites on the island of Malta as being of between 3 Star and 1 Star quality. Almost two thirds of respondents (67%) rated the condition and quality of the infrastructure and facilities available at boat dive sites as being of between 3 Star and 1 Star quality.

Operational challenges identified by the industry<sup>21</sup>, and considered to be critical constraints to the recovery of the industry, include the shortage of trained staff locally and the difficulty in recruiting foreign employees, a consequence of Brexit, as well as the pandemic.

#### **Way Forward for the Diving Industry**

The research undertaken by the industry at the onset of the pandemic<sup>22</sup> highlighted marketing as being important to ensure that Malta remained competitive and as a destination of choice once the pandemic was over.

Investment in the product, to compliment the marketing, was also considered to be important. The establishment of marine reserves / parks (beginning with the Cirkewwa / Qammieħ area), the scuttling of wrecks, and the upgrading of the infrastructure and facilities at existing dive sites were identified as areas for further investment.

At the outset of the pandemic, the industry highlighted the need for a planned and targeted approach to the recovery of the industry, by Government, the MTA and the PDSA, to maximise the potential of investments already made and to safeguard the industry in the future.

Again, it is clear that these priorities remain relevant. Responses from the industry questionnaire identified the top three priority measures / actions required to support the diving industry and enhance Malta's competitiveness post COVID-19 to be: preserving

<sup>21</sup> Information derived from discussions with the Professional Diving Schools Association Malta in October 2021

<sup>22</sup> Source: The Impact of Covid-19 on the Diving Industry in Malta 2019 (May 2020). EMCS

and protecting the marine environment, maintaining and enhancing the infrastructure and facilities available at dive sites, and the management, regulation and promotion of the industry.

Almost all respondents to the questionnaire (95%) identified the variety of fish and marine life and water quality to be very important factors in contributing to the quality and sustainability of the diving product. 85% of respondents identified the variety of dive attractions and the infrastructure and facilities available for divers to be very important factors.

Other operational priorities identified by the industry<sup>23</sup>, and considered necessary to aid recovery of the industry, include investment by the Government in supporting the dive centres, including assistance in the area of staff recruitment.

Another area for investment identified includes facilitating the 'greening' of the industry, in respect of reducing plastic use and waste, for example.

### **Profile of the Diving Tourist in Malta**

Prior to the onset of the COVID-19 pandemic, the majority of dive tourists to Malta were European, the largest markets in 2019 being the United Kingdom (UK), Italy, Germany, and France, representing approximately 16%, 15%, 12% and 12%, respectively<sup>24</sup>.

The primacy of the European market is expected to remain post-pandemic. The experience of the industry emerging from the pandemic has been that Malta's competitiveness compared with destinations outside of Europe has been enhanced. There is evidence that European dive tourists consider it safe to travel to Malta to dive. The travel distance is also an attraction factor as dive tourists regain confidence in travelling. These aspects will afford Malta some advantage in the short-term as the global industry recovers.

It has been the experience that, relative to other visitors, dive tourists tend to have larger disposable incomes and are typically in the age range of 25 to 54 years old. The spending impact of divers on Malta's economy is further enhanced as dive tourists are more likely to hire cars and rent self-catering accommodation. Additionally, dive tourists typically stay for relatively longer visits than other inbound tourists (the average length of stay in 2019 was 9 nights<sup>25</sup>).

A review of dive tourists' total per capita expenditure in 2019 reveals that Australians spent the most (€527), with the largest spenders from the European market being the Swiss (€357), the Irish (€355) and Scandinavians (€330)<sup>26</sup>. The total per capita expenditure by Malta's largest markets in 2019 were: UK (€287), France (€274), Italy (€267), and Germany (€256).

<sup>23</sup> Information derived from discussions with the Professional Diving Schools Association Malta in October 2021

<sup>24</sup> Source: The Profile of Diving Travellers in Malta 2019 (September 2020) Malta Tourism Authority

<sup>25</sup> Ibid.

<sup>26</sup> Source: Performance of the Diving Industry in Malta 2019 (May 2020). EMCS. These figures exclude the cost of flights and accommodation.

Dive tourists to Malta tend to decide on Malta as a destination having browsed the internet and used social media (63%) and on the recommendation of friends or relatives (39%)<sup>27</sup>. In 2019, approximately 30% of dive tourists to Malta were returning visitors<sup>28</sup>.

### The Diving Product in Malta

Diving, and shore diving in particular, occurs all around the coasts of Malta, Gozo, and Comino where there is unrestricted access to the coast.

**Figure 2.1** identifies the location of the most popular shore and boat dive sites around the Maltese Islands<sup>29</sup> <sup>30</sup>. In Malta, the popular dive sites are generally concentrated along / off the eastern and northern coasts of the Island, whereas the steeper coastal terrain and deeper waters renders diving off the western and southern coasts less attractive. Diving occurs more generally around Gozo and Comino.

The MTA and MGOZ has been marketing dive sites for a number of years, and the most popular sites are also described in a number of publications on diving in the Maltese Islands. However, there are, as yet, no officially designated dive sites. The Strategy seeks to address this, by identifying what are known to be the most popular recreational dive sites for tourists.

The official recognition of dive sites will facilitate the better management of the diving resource, ensuring a coordinated approach by those Government entities with direct involvement in the industry – the MTA, the Planning Authority (PA), the Environment and Resources Authority (ERA), and Transport Malta (TM) – as well as those with indirect involvement, including the Department of Fisheries and Aquaculture.

Designation of dive sites, together with their official recognition by Government, will also afford the MTA, and the industry, greater certainty in promoting dive tourism.

The **Strategic Plan for the Environment and Development (SPED) 2015** identifies areas where diving takes place around the coasts of Malta, Gozo, and Comino (referred to as 'dive sites'), with the policy objective of protecting these from conflicting uses<sup>31</sup>. These areas are intended to be indicative locations, but they have been identified with regard to the most popular dive sites identified in the previous diving masterplans for Gozo and Comino (2006) and for Malta (2011).

27 Ibid.

28 Source: The Profile of Diving Travellers in Malta 2019 (September 2020) Malta Tourism Authority

29 Information derived from discussions with the Professional Diving Schools Association Malta

30 It is to be noted that several other locations can be dived, and individual dive centres will identify other sites that can be safely dived. The Strategy focuses on the more popular and more regularly dived sites.

31 SPED 2015, Coastal Objective 3

The PA envisages formalising the location of the specific dive sites in the revised local plans, to support the policy objectives for the Coastal Zone. The Strategy will inform the local plans in respect of the location of the specific dive sites and the policy objectives for the provision of the required physical infrastructure.

With the exception of the **Gozo and Comino Local Plan 2006**, the existing local plans make little reference to diving. The Gozo and Comino Local Plan identifies the main diving sites on Gozo as Qawra / Dwejra, Reqqa Point / Qbajjar, and Xatt l-Aħmar / Ras il-Ħobż<sup>32</sup> and acknowledges the popularity of Comino for diving. The Strategy recognises these dive sites.

A number of the popular wreck dive sites are identified in TM's Notices to Mariners, which make special provision for activities in the vicinity of these sites (explained further below). The Strategy recognises also these dive sites.

### Shore Diving

There are 32 designated shore dive sites in the Maltese Islands - 15 off Malta and 17 off Gozo. There are no shore dive sites off Comino since the island has still to be accessed by boat. Some of the shore dive sites also function as boat dives. **Table 2.3** identifies the most popular shore dive sites in Malta and Gozo<sup>33</sup>.

The majority of dives undertaken by tourists to Malta are in relation to shore dive sites; in 2019, 69% of Maltese dive centres revealed that over 75% of their business related to shore diving<sup>34</sup>.

Many shore dives feature unusual and spectacular features of the marine topography, for example, the Blue Hole (GS06) and the Double Arch (GS13 and GB22) in Gozo, the Mini Blue Hole at Marsaskala (MS03) and the Ċirkewwa Arch (MS10).

Shore dives also provide divers with an opportunity to explore a variety of reef wildlife, for example, the Coral Gardens, Sliema (MS14) and the Ċirkewwa Reef (MS10).

Shore dive attractions include historic, typically war-period wrecks, such as the HMS Maori, St Elmo, Valletta (MS01), the SS Margit, Kalkara Creek (MS02), and the X127 Lighter, Manoel Island (MS13), to scuttled wrecks, including the Tugboats and the P33 patrol boat off Żonqor Point (MS04), Um el Faroud at Żurrieq (MS06), and the Xatt l-Aħmar Wrecks in Gozo (GS02).

There are currently 10 scuttled wrecks that are accessible from shore dive sites: the MV Rożi and P29, Ċirkewwa (MS10); the Um el Faroud, Żurrieq (MS06); the Tug 2 at Exiles, Sliema (MS13); tugboats Number Ten and the St Michael and the former patrol boat P33<sup>35</sup>, off

32 Gozo and Comino Local Plan 2006, paragraph 10.3.2: Coastal Recreation

33 Information derived from discussions with the Professional Diving Schools Association Malta

34 Source: The Profile of Diving Travellers in Malta 2019 (September 2020) Malta Tourism Authority

35 Unfortunately, this vessel suffered considerable damage during a recent storm (April 2022). The damage is being assessed with a view to decide on whether interventions are required.

Żonqor Point (MS04); and the MV Xlendi, MV Karwela and MV Cominoland at Xatt l-Aħmar, Gozo (GS02).

**Table 2.3: Most Popular Shore Dive Sites in the Maltese Islands**

	Malta	Gozo
1	<ul style="list-style-type: none"> <li>Ċirkewwa (MS10)</li> </ul>	<ul style="list-style-type: none"> <li>Dwejra (GS06)</li> </ul>
2	<ul style="list-style-type: none"> <li>East Reef, West Reef and Caves, and Um el Faroud, Zurrieq (MS06)</li> </ul>	<ul style="list-style-type: none"> <li>Xatt l-Aħmar Wrecks (GS02)</li> </ul>
3	<ul style="list-style-type: none"> <li>Għar Lapsi (MS07)</li> <li>Anchor Bay (MS09)</li> </ul>	<ul style="list-style-type: none"> <li>Reqqa Point, Żebbuġ (GS11)</li> </ul>
4	<ul style="list-style-type: none"> <li>HMS Maori, St Elmo (MS01)</li> <li>SS Margit, Kalkara Creek (MS02)</li> <li>X127 Lighter, Manoel Island (MS15)</li> </ul>	<ul style="list-style-type: none"> <li>Inland Sea, Dwejra (GS07)</li> </ul>
5	<ul style="list-style-type: none"> <li>Tugboats, Żonqor Point (MS04)</li> <li>Tug 2, Exiles (MS13)</li> </ul>	<ul style="list-style-type: none"> <li>Xwejni Bay, Żebbuġ (GS14)</li> </ul>

Source: Professional Diving Schools Association Malta

The site surveys conducted to inform the Strategy reveal that the access to, infrastructure available at, and the characteristics of the shore dive sites vary considerably. Despite the popularity of some dive sites, at the time the site surveys were undertaken the basic infrastructure (for example, ladders / railings giving access to the water) was, in some cases, missing or requiring maintenance or replacement<sup>36</sup>. At other locations, as identified by the industry, there are issues related to littering, vandalism of dive trucks, and overcrowding of the site / car park, which are creating problems for site users.

As mentioned, 95% and 82% of respondents to the industry questionnaire conducted in June / July 2021 rated the condition and quality of the infrastructure and facilities available at shore dive sites on Gozo and on the island of Malta, respectively, as being of between 3 Star and 1 Star quality.

In the case of two of the Gozo shore dive sites - Wied il-Għasri (GS09) and Billingham Cave, Żebbuġ (GS10) - all the respondents identified the condition and quality of the infrastructure and facilities available to be only fair to very poor.

In the case of three of the Malta shore dive sites, all the respondents identified the condition and quality of the infrastructure and facilities available to be only fair to very poor - St Elmo, Valletta (MS01), SS Margit, Kalkara Creek (MS02), Mini Blue Hole Marsaskala (MS03), and East Reef and South Reef, Delimara Point (MS05). Notably, since the questionnaire was carried out, the MTA has upgraded the infrastructure and facilities at St Elmo, Valletta (MS01) and maintained the infrastructure at other sites.

Conversely, in the case of seven of the Gozo shore dive sites, some of the respondents rated the condition and quality of the infrastructure and facilities available to be excellent - Xatt l-Aħmar (Wrecks) (GS02), Ras il-Ħobż (GS03), Mġarr ix-Xini (GS04), Xlendi Bay (GS05), Dwejra (GS06), Wied il-Mielah (GS08), and Ħondoq ir-Rummien, Qala (GS17).

<sup>36</sup> The site surveys were conducted in June / July 2021. It is acknowledged that the MTA and MGOZ have subsequently undertaken a number of interventions.

In the case of only five of the Malta shore dive sites did respondents rate the condition and quality of the infrastructure / facilities to be excellent - Għar Lapsi (MS07), Black John, Għar Lapsi (MS08), Ċirkewwa (MS10), Exiles, Sliema (MS13), and X127 Lighter, Manoel Island (MS15). In the case of Ċirkewwa (MS10), all of the respondents rated the condition and quality of the infrastructure and facilities available to be good or excellent.

When asked to identify what is required to improve the infrastructure and facilities available at shore dive sites, the respondents cited issues with accessibility, in relation to access being prohibited to certain sites, the lack of parking and kitting up facilities, and the lack of infrastructure to facilitate access to / from the sea. The need for better security at dive sites was also cited by respondents.

### Boat Diving

There are a range of boat diving attractions around the Maltese Islands (see **Figure 2.1**). There are over 60 boat dive sites in total – 23 off Malta, 26 off Gozo, and 13 off Comino, with some historical wrecks being made available for diving (mostly technical diving) from time to time, by the Underwater Cultural Heritage Unit of Heritage Malta. As mentioned, some of the boat dive sites are also shore dives. **Table 2.4** identifies the most popular boat dive sites in Malta, and the most popular boat dive sites in Gozo and Comino<sup>37</sup>.

Malta's boat dive attractions vary from sites with specific morphological features, for example, overhangs, swim throughs, and arches and reefs, to historic and scuttled wrecks.

In addition to the shore-accessible historic wrecks mentioned earlier, there are 12 historic wrecks off the coast of Malta accessible only by boat. These are: the Bristol Beaufighter (MB01), the HMS Hellespont (MB02), the HMS Drifter Eddy (MB03), the HMS St Angelo (MB04), the Schnellboot S-31 E-Boat (MB05), the Italian E-Boat (MB06), the HMS Southwold (MB07), the Le Polynesian (MB08), the Blenheim Bomber (MB09), the Mosquito Bomber (MB10); the HMS Stubborn (MB16); and the Lockheed P-2 Neptune Plane (MB19).

In addition to the historic wrecks, there are also currently a further five scuttled wrecks that are accessible only by boat: the Scotts Craig (MB12); the MV Pippo (MB17); the Imperial Eagle (MB18); the Dredger Anadrian (MB20); and the Patrol Boat P31 (CO10).

Furthermore, a number of technical boat dive sites have also been recently made available for diving by the Underwater Cultural Heritage Unit. A special permit is required to dive these wrecks. Examples include: the B-24 Liberator Bomber, off Marsaxlokk; the HMS Nasturtium; the HMS Russell; the HMS Aegusa, off the southeastern coast of Malta; and the SS Luciston Collier, off Delimara.

As mentioned, almost two thirds of respondents (67%) to the industry questionnaire conducted in June / July 2021 rated the condition and quality of the infrastructure and facilities available at boat dive sites as being of between 3 Star and 1 Star quality.

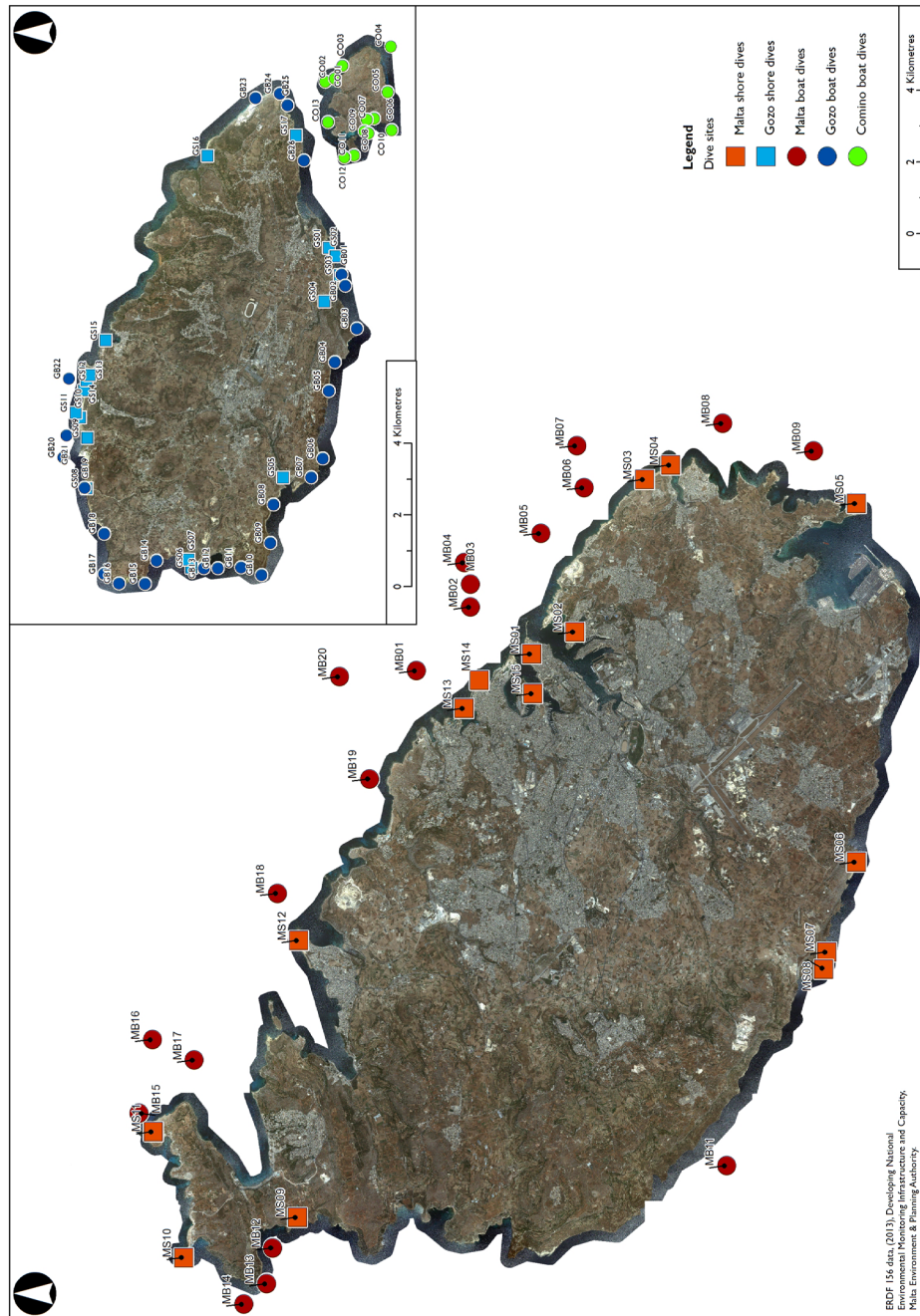
When asked to identify what is required to improve the facilities available for boat dives, the majority of respondents cited the need for the provision and regulation of the use of mooring buoys, in order to address the environmental impacts from anchoring. The need

<sup>37</sup> Information derived from discussions with the Professional Diving Schools Association Malta



for upgrading of launch facilities and jetties was also mentioned, together with the need for a greater number of boat operators, and for regulation and control of the boat dive market.

Figure 2.1: Dive Sites on the Maltese Islands



ERDF 156 data (2013). Developing National Infrastructure and Capacity. Malta Environment & Planning Authority.

Table 2.4: Most Popular Boat Dive Sites in the Maltese Islands

	Malta	Gozo / Comino
1	<ul style="list-style-type: none"> <li>MV Imperial Eagle / Qawra Reef and Cave (MB18)</li> </ul>	<ul style="list-style-type: none"> <li>Double Arch (GB23)</li> </ul>
2	<ul style="list-style-type: none"> <li>Bristol Beaufighter (MB01)</li> </ul>	<ul style="list-style-type: none"> <li>Patrol Boat P31 (CO10)</li> </ul>
3	<ul style="list-style-type: none"> <li>HMS Hellespont (MB02)</li> </ul>	<ul style="list-style-type: none"> <li>Wied il-Mielgħ (GB20)</li> </ul>
4	<ul style="list-style-type: none"> <li>Blenheim Bomber (MB09)</li> <li>Lockheed P-2 Neptune Plane (MB19)</li> </ul>	<ul style="list-style-type: none"> <li>Ras San Dimitri (GB16)</li> </ul>
5	<ul style="list-style-type: none"> <li>Devil's Reef, Qammieġ (MB13)</li> </ul>	<ul style="list-style-type: none"> <li>Taċ-Cawla (GB19)</li> <li>Crocodile Rock (GB13)</li> </ul>

Source: Professional Diving Schools Association Malta

### THE DIVING INDUSTRY AND DIVING REGULATION

There has been a steady growth in the number of dive centres on both Malta and Gozo over the last decade. In 2006, there were only 11 licensed dive centres on Gozo (including 1 on Comino) and 33 on Malta.

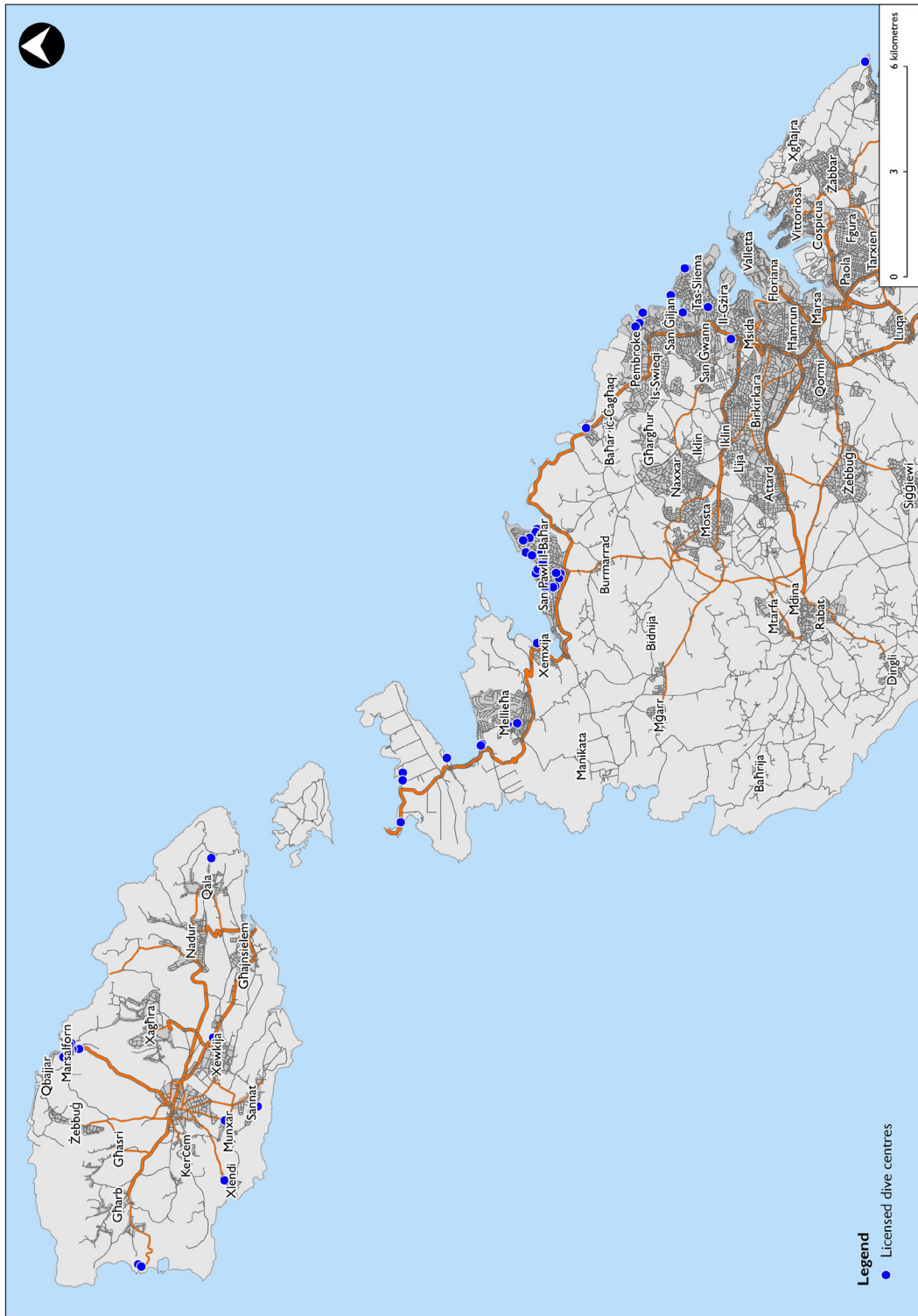
There are currently 60 licensed dive centres across the Maltese Islands (**Figure 2.2**); these include 42 on Malta and 18 on Gozo. The COVID-19 pandemic has not impacted to reduce the number of licensed dive centres, although the industry has concerns that staff shortages may see the closure of centres in the near future<sup>38</sup>.

The majority of the dive centres are Maltese-operated; there are currently two centres affiliated with international dive operators.

Pre-pandemic, Malta enjoyed a good reputation arising from the performance of Maltese dive centres, including the willingness of the centres to tailor dive schedules to meet divers' requirements. In this respect in particular, Malta had an advantage over some of the larger dive centres at the Red Sea. This advantage will serve to facilitate the recovery of Malta's diving industry post-pandemic. However, it is important to sustain this advantage, by further improving the product, especially through improving the support infrastructure and designating conservation areas to protect and enhance marine life.

<sup>38</sup> Information derived from discussions with the Professional Diving Schools Association Malta

Figure 2.2: Licensed Dive Centres in the Maltese Islands



### Recreational Diving Regulations

The Diving Regulations in Malta were updated in 2012<sup>39</sup>. At the time of writing, the regulations are currently under review again<sup>40</sup>.

The aim of the Recreational Diving Regulations is **“to establish the licence and other requirements for service providers in the field of recreational scuba diving”**. The Regulations fall under Article 47 of the Malta Travel and Tourism Services Act and are implemented by the MTA.

The Regulations require that persons offering recreational diving services hold a valid license, issued by the MTA under the terms of the Regulations. Their primary purpose is to ensure that:

- the applicant is sufficiently qualified and competent to provide diving services;
- the infrastructure, equipment, and operations of the dive centre meets required standards; and
- the applicant has sufficient third-party liability insurance.

Once granted, licenses are renewed annually, and each license requires an appointed ‘director of diving’ who is ultimately responsible for ensuring compliance with the Regulations.

The Regulations focus primarily on safety and operational issues (requirements to undertake risk assessments and safety drills, prepare dive logs and ensure client medical checks). A new measure introduced in the draft revised regulations is the requirement for divers over 60 years of age to present a medical certificate to the dive centre.

### Notices to Mariners

In 2008, the Malta Maritime Authority (now the Ports and Yachting Directorate of TM) issued Notice to Mariners No 5 of 2008<sup>41</sup>, which established ‘Conservation Areas’, identified as ‘No Stopping Areas’, around seven wreck dive sites. Two subsequent Notices to Mariners in 2009 and 2013 introduced new ‘No Stopping Areas’ at two new scuttled wrecks<sup>42</sup>. In May 2019, Notice to Mariners No 41 of 2009<sup>43</sup> updated the previous notices and established a further five ‘No Stopping Areas’ around wreck dive sites.

Currently, there are a total of 12 designated ‘No Stopping Areas’ (see **Table 2.5**).

39 Legal Notice 359 of 2012: Recreational Diving Services Regulations (as amended, S.L.409.13

40 Draft revised regulations were issued for public consultation in February 2016

41 Notice to Mariners No 5 of 2008 – Conservation Areas around Wrecks

42 Notice to Mariners No. 60 of 2009 – Scuttling of Patrol Boat P 31 and Notice to Mariners No. 19 of 2013 – Chart Correction

43 Notice to Mariners No 41 of 2019 – Conservation Areas around Wrecks – Updated May 2019

In June 2021 (following the declaration of Archaeological Zones at Sea and the opening of a number of historic wrecks for technical diving against a special permit from Heritage Malta), the Ports and Yachting Directorate issued Notice to Mariners No 19 of 2021<sup>44</sup>, reminding mariners that the Superintendence of Cultural Heritage (SCH) has designated protected sites (described as Archaeological Zones at Sea) under the Cultural Heritage Act 2019. The buffer zones to these Archaeological Zones at Sea are identified as 'No Stopping Areas'.

Table 2.5: Dive Sites with Designated Conservation Areas (No Stopping Areas)

Site Name (in Notices to Mariners)	Site Name (in Figure 2.1)
Um el Faroud	MS06 - Um el Faroud
MV Xlendi, MV Cominoland and MV Karwela	GS02 - Xatt L-Aħmar Wrecks
Tug St Michael / Tug 10 / P33	MS04 - Żonqor Point
Imperial Eagle	MB18 - Imperial Eagle
Rożi / P29	MS10 – Cirkewwa
Blenheim Bomber	MB09 - Blenheim Bomber
Bristol Beaufighter	MB01 - Bristol Beaufighter
Patrol Boat P31	CO10 - Patrol Boat P31
Tug 2	MS13 – Exiles, Sliema
Scotts Craig	MB12 – Scott Craig
MV Pippo	MB17 – MV Pippo
HMS Stubborn	MB16 – HMS Subborn

The new 'No Stopping Areas' designated under Notice to Mariners No 19 of 2021 include a number of boat dive sites (mostly technical dives):

- Xlendi Underwater Archaeological Park (Gozo);
- Off il-Ponta tal-Qawra (JU88);
- Off il-Bajja ta' San Giljan, comprising Fairey Swordfish;
- Off il-Port il-Kbir (Valletta), comprising HMS Olympus, Schnellboot, and HM Trusty Star;
- Off il-Bajja ta' Marsaskala, comprising ORP Kujawiak, HMS Southwold (Bow); HMS Southwold (Stern), SS Polynesian (Bow), SS Polynesian (Stern), HMS Nasturtium, HMS Russell, JU88, and Maryland bomber;
- Off il-Ponta ta' Bengħajsa, comprising B24 Liberator and Douglas A-1 Skyraider.

<sup>44</sup>The 'No Stopping Areas' are areas where anchoring is only allowed in the case of dive boats (and following pre-notification to the Valletta Vessel Traffic Service). The Notice to Mariners Archaeological Zones at Sea – Superintendence of Cultural Heritage, consolidated 2021.

also prohibits spear fishing and the use of set bottom lines, trammel, gill, entangling and encircling nets, demersal pots, and traps within the 'No Stopping Areas'. The only form of fishing that is allowed is surface fishing, including trolling lines, and angling for pelagic fish.

## THE DIVING INDUSTRY AND ENVIRONMENTAL REGULATION

### International Designations - Marine Protected Areas, Special Conservation Areas, Special Protection Areas, and Natura 2000 Sites

**The coastline of the Maltese Islands, both the sea and the terrestrial component, is relatively well protected in terms of environmental designations.**

The entire coastal waters of Gozo and Comino, and the coastal waters around the majority of the island of Malta, are designated as Marine Protected Areas (MPAs) – see **Figure 2.3**.

In Malta, designation of areas under the EU Council Directive 92/43/EEC<sup>45</sup> on the **Conservation of Natural Habitats and of Wild Fauna and Flora** (the Habitats Directive) (1992) and under the Council Directive 2009/147/EC on the **Conservation of Wild Birds** (the Birds Directive) provide a basis for the designation of MPAs.

EU Council Directive 92/43/EEC provides a basis for the protection of land and marine habitats that are recognised as being of Community Importance. The Habitats Directive requires the establishment of Special Areas of Conservation (SACs).

EU Council Directive 2009/147/EC aims to protect all European wild birds and the habitats of listed species, in particular through the designation of Special Protection Areas (SPAs).

The network of SACs together with the SPAs form a network of protected sites across the European Union called Natura 2000.

Malta's marine Natura 2000 (MPA) network is extensive, as mentioned; it excludes only the eastern / southeastern shores of Malta (from Spinola Bay in St Julians to Birżebbuġa).

The network of terrestrial Natura 2000 sites is less extensive but includes the entire coastline of Comino and the majority of the coastlines of Malta and Gozo (see Figure 2.4).

The majority of the current boat dive and shore dive sites are located (accessed from) within or close to Natura 2000 sites. Accordingly, proposals for any new infrastructure will likely require screening for Appropriate Assessment (AA), to determine the impacts of the development on the SAC.

Malta has a legal obligation under Article 4 of the EU Habitats Directive to manage Natura 2000 sites. Management Plans, and in some cases Conservation Orders, have been prepared for all terrestrial sites within the Natura 2000 network<sup>46</sup>.

ERA has commenced the process of preparing management plans for the marine Natura

45 This Directive was transposed into local legislation by LN 311 of 2006

46 The Management Plans were formally adopted in 2016, having been prepared by the then Malta Environment and Planning Authority (now ERA) in collaboration with Epsilon International SA – Adi Associates Environmental Consultants Ltd Consortium

2000 sites<sup>47</sup>.

The management plans for terrestrial and marine Natura 2000 sites are seen as important delivery tools for facilitating the implementation of this Strategy, in respect of raising awareness of the importance of marine life and marine habitats and enhancing regulatory powers to ensure the better protection of the diving resource.

### **Local Designations**

#### **Marine Habitats**

In addition to the international environmental designations, there are a number of protected marine habitats in Malta, designated because of their importance locally. In all cases, the protected marine habitats lie within the designated MPAs.

#### **Marine Parks**

A management plan is currently being prepared for a marine park focussed on the area of Ċirkewwa / Qammieħ (Malta). The brainchild of the MTA, the management plan is being formulated by Nature Trust-FEE Malta, which is also the designated Managing Body for the park<sup>48</sup>.

As described below, the 'Marine Park' designation envisages regulatory powers through the implementation of the management plan, with the main aim being environmental protection, in particular of fish stocks, which are the primary attractions for the diving industry.

The management plan will include actions to survey and monitor the quality of the environmental habitat and marine life within the park, as well as actions to sustain and restore the habitat and marine life as necessary.

### **European Marine Strategy Framework Directive**

The Marine Strategy Framework Directive<sup>49</sup> has been transposed into Maltese Legislation through Legal Notice 73 of 2011. This Legal Notice establishes the Office of the Prime Minister (OPM) as the Competent Authority for the implementation of the Directive.

In accordance with these Regulations, the OPM has delegated its tasks to the Ministry responsible for the Environment, with ERA entrusted with its technical implementation.

The goal of the Directive is to establish a national marine strategy, taking an 'ecosystem-based approach' whereby management of marine activities is driven by the prime intention to protect and preserve the marine environment. The aim is to achieve Good

<sup>47</sup> Public consultation to inform definition of the objectives and measures for the management of the Marine Protected Areas was undertaken by ERA in April / May 2017.

<sup>48</sup> The eight-month period for formulating the management plan was initiated in September 2021. The process will involve extensive stakeholder engagement.

<sup>49</sup> Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive) (Text with EEA relevance).

Environmental Status (GES) in marine waters by 2020.

Following an initial assessment of the marine waters, ERA has developed a Monitoring Programme and a Programme of Measures designed to achieve and maintain GES by addressing predominant pressures and impacts identified in the initial assessment. The Strategy for a sustainable diving industry in Malta will facilitate ERA's further assessment to inform implementation of the national marine strategy.

Figure 2.3: Marine Natura 2000 Network in Malta





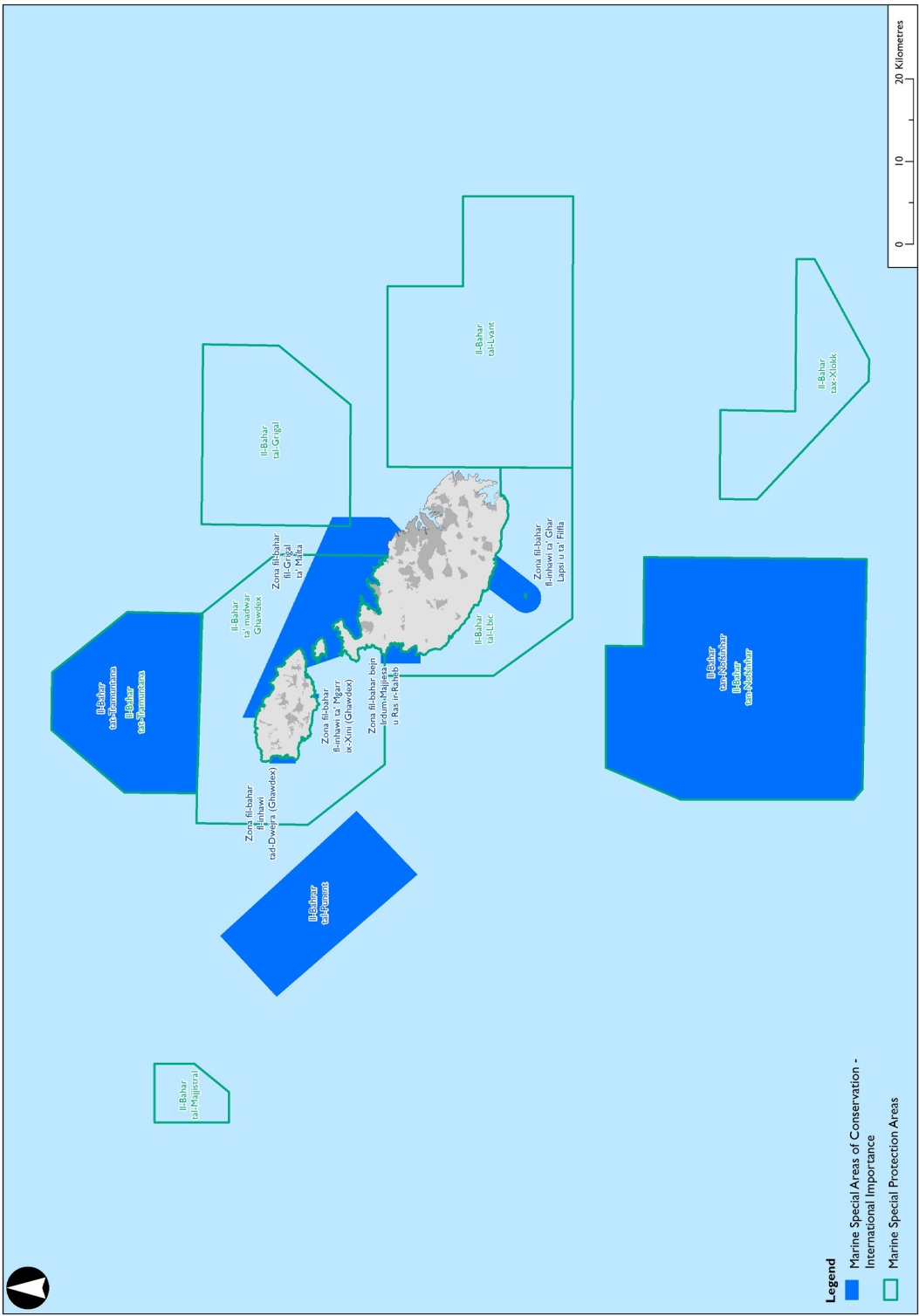
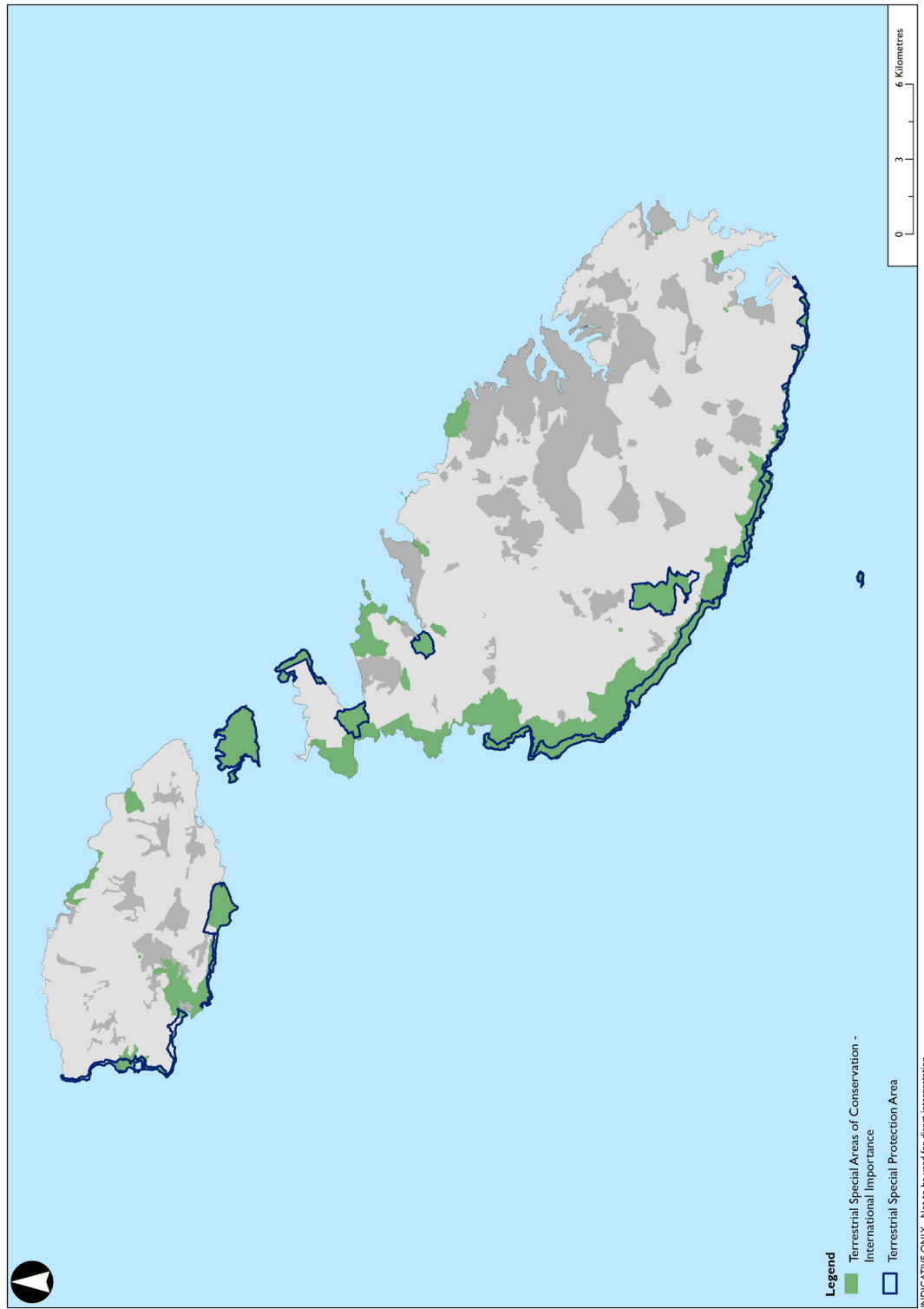


Figure 2.4: Terrestrial Natura 2000 Network in Malta



Malta as a Competing Dive Destination

There are a number of factors that influence a diver's choice of dive destination, and these factors are a combination of the practical and more qualitative considerations.

Practical considerations include: value for money; travel time to the destination; the climate, and water temperature in particular; and the distance between the accommodation and potential dive sites when at the destination.

More subtle considerations relate to perceptions of the quality of the overall experience; for example, a dive tourist might ask:

- *Is the water clear and is there good visibility?*
- *What is the quality of the marine environment? Will I be able to see a range of sea life?*
- *Is there plenty to do and see underwater? Will there be a good range, quality, and variety of dive sites? (Particularly a question for technical divers and more experienced recreational divers)*
- *Are there good facilities for divers (close to dive sites and accommodation)?*
- *Will the dive centre staff speak my language?*
- *Will there be other activities that my partner / family can do whilst I'm diving? and*
- *Are there other cultural, sports, leisure attractions and activities that I can see / do when I'm not diving?*

Additional considerations for divers, at least in the short-term as Malta emerges from the COVID-19 pandemic, are likely to relate to the relative safety of the Islands as a destination, as perceived by dive tourists, and assuming the number of COVID-19 cases remain low. This will be especially relevant in the case of the important European market.

### **Industry Gap Analysis**

The gap analysis that has been conducted to inform the Strategy takes account of the current situation, as Malta emerges from the COVID-19 pandemic and the review of the status of the industry pre-pandemic.

It was clear in 2019 that, whilst Malta's diving industry had experienced considerable expansion over the previous decade, there were a number of issues already influencing the quality of the dive tourism product.

Recent consultation with the industry has revealed that these issues are still very relevant. With Malta's diving industry needing to enhance its competitiveness as it emerges from the pandemic, these issues need to be addressed with priority in order to facilitate recovery, and to be regularly kept in check, in order to ensure that Malta can continue to reasonably compete with other dive destinations in the Mediterranean region and globally.

### **Key Issues**

The key issues the diving industry in Malta is considered to be facing currently can be categorised under two broad areas – in relation to **environmental stewardship of the diving resource** and the **management of the diving industry**. There is some overlap between the two areas; however, the particular challenges for the diving industry in Malta going into the future can be summarised as:

- The relatively low levels of marine life and the continued threats from unsustainable

fishing, indiscriminate anchoring, construction, and other activities that are damaging marine habitats;

- low levels enforcement in relation to fishing and mooring / anchoring, even where regulations are in place, and a lack of awareness of the regulations, and of the threats to the marine environment from specific activities;
- State of the shore-based infrastructure at individual dive sites, and the fragmented management of the upkeep and maintenance of this infrastructure;
- The availability of qualified diving instructors and staff generally, especially relevant in the short-term, and given the industry's current reliance on foreigners.

**Table 2.6** summarises the issues currently facing the diving industry in Malta, as well as the possible solutions to these issues. The issues are further discussed below

### **Environmental Stewardship**

The primary weakness of the Maltese diving product is the relatively low levels of fish and marine life in Maltese waters, compared with Malta's competitors. The industry has identified unsustainable fishing practices and a poor marine environment to be the primary issues of concern for the industry and potential constraints for the development of the industry.

The threat from fishing activity, as a result of both overfishing and inappropriate fishing methods (indiscriminate fishing with nets, for example), is a significant issue therefore for the sustainability of the industry going into the future.

Similarly, anchoring activity at or close to boat dive sites, which can damage marine habitats, is an important concern. In most cases, there are no moorings available. There is also a risk to the safety of divers from the indiscriminate dropping of anchors, as well as from net fishing activity.

In the case of 12 of the recreational wreck dive sites, regulations are in place to prevent boats from stopping at these sites, unless for the purpose of diving. As mentioned, the Notices to Mariners identify 'No Stopping Areas', as well as prohibit spear fishing and fishing using nets, bottom lines, demersal pots, and traps.

There is a recognised lack of awareness of the regulations, however, including from those involved in the diving industry, as well as a low levels enforcement, and evidence of fishing activity and indiscriminate anchoring still taking place within the 'No Stopping Areas'. In respect of enforcement, the Notices to Mariners simply act as a conduit for relaying information to mariners.

Notices to Mariners are issued by TM; however, the responsibility for enforcing the regulations of the Notices also lies with the Department of Fisheries and Aquaculture.

Monitoring of the Conservation Areas / No Stopping Areas is conducted by the Armed Forces of Malta (AFM) and the Administrative Law Enforcement (ALE) section of the Malta Police Force.

The poor environmental stewardship of the marine environment is also a result of the lack

of awareness of the importance of the conservation of marine life and marine habitats, including by those often involved in the industry (those dive boat operators and crew not affiliated with a dive centre, for example). Raising awareness of the existing environmental designations, as well as increasing the number of MPAs and designating Marine Reserves / Parks around the most sensitive dive sites, would help address this issue. The training (and better regulation) of those involved in the industry would also work towards enhanced environmental stewardship.

### **Management of the Industry**

The industry also cites the availability and state of the infrastructure and facilities at dive sites to be a concern and a potential constraint for the development of the industry. The detailed site surveys conducted to inform the Strategy reveal shortcomings in the quality of the infrastructure at, and amenity of, the on-shore facilities for diving.

The main issue is the inadequate infrastructure in some cases, for entering / exiting the water, in terms of the number of ladders / railings, etc., available and their year-round availability. The lack of suitable changing ('kitting out') facilities and poor amenity generally (cleanliness and general safety), as well as poor vehicle and pedestrian access to the sites and the lack of adequate (or any) parking at / near the sites are also issues that need to be addressed. Of recent concern are problems divers are experiencing in accessing certain of the shore dive sites, most notably those on the northern shore on Gozo.

The specific inadequacies and improvement needs of the individual shore dive sites are summarised in **Table 3.1** below.

In Malta, providing infrastructure to facilitate divers getting into / out of the water is the responsibility of the MTA (currently the works are contracted out to either the Government Works Department or the PDSA). Where dive sites are close to swimmer zones and ladders / railings are shared with swimmers, the Cleansing and Maintenance Division (Beach Cleansing Unit) of the Ministry for Tourism, as well as certain local councils, also have responsibility in this area.

In Gozo and Comino, the responsibility for provision of infrastructure for accessing the water is clearer – this lies with the MGOZ. Again, there is sharing of facilities with swimmers in places.

There is a similar fragmented approach in respect of the provision of changing / kitting out facilities, sanitary facilities, signage, and safety / first aid equipment, where local councils in Gozo, as well as in Malta, also have a role. Additionally, those dive centres located at / close to dive sites generally make available facilities for changing / kitting out, as well as sanitary facilities and basic first aid.

The sharing of facilities, with swimmers (and other recreational users), is acceptable to the industry, and obviously this is also desirable in terms of the environmental management of the coast. However, any strategy for the diving industry should ensure that due consideration is afforded to divers in both the provision of shore-based infrastructure and their year-round enjoyment of dive sites.

The MTA has invested in placing infrastructure which can be on site all year round at the

most popular dive sites, including ladders / railing access to the sea, and in recognition of industry concerns..

A related issue is the overcrowding of dive sites during the summer season, particularly at the most popular dive sites. This results from the lack of adequate facilities for getting into / out of the water at the less popular dive sites, where dive centres will generally advise divers to visit when the facilities are available. The recent approach of the MTA to install proper diving ladders in the popular dive sites has help to counter this matter.

The performance of the diving industry itself is an issue for the sustainability of the industry going forward, where there is an uncoordinated approach to management by the dive centres.

The overcrowding of dive sites is also symptomatic of the lack of cooperation between dive centres, to the detriment of their own clients. Better liaison between the centres regarding the scheduling of dive trips, particularly in the case of large groups, would reduce overcrowding, for example.

Similarly, the sharing of knowledge on weather / sea conditions, and of other factors likely to influence diving on the day, would also serve to improve the service to clients. In this regard, the use of a web-based system to relay real-time information to dive centres would facilitate the service of, and the cooperation between, centres.

The issue of divers being unable to gain access to certain dive sites may require interventions that lead to the obtainment of measures that ensure and secure access for divers to the designated dive sites.

The challenges identified by the industry in retaining and recruiting staff are considered by the industry to be critical constraints to the recovery of the industry in the short-term especially. The impacts of the COVID-19 pandemic have been exacerbated by the freedom of movement restrictions between the UK and Malta arising from Brexit.



Issue	Main Causes	Possible Solutions
<p><b>Environmental Stewardship</b></p> <p>Low levels of fish and marine life</p>	<ul style="list-style-type: none"> <li>▪ Overfishing and inappropriate fishing methods,</li> <li>▪ Anchoring (which can damage marine habitats)</li> <li>▪ Construction activities on the coast and offshore</li> <li>▪ Other activities with damaging effects on the marine environment</li> </ul>	<ul style="list-style-type: none"> <li>▪ Effective enforcement of existing regulations in respect of the designated Conservation Areas / 'No Stopping Zones' (Notices to Mariners)</li> <li>▪ Additional regulatory control, through the designation of additional Conservation Areas / 'No Stopping Areas', through the designation of new Marine Reserves / Parks, and through the management plans for the Marine Protection Areas</li> <li>▪ Fostering greater understanding between the diving industry and fishermen</li> <li>▪ Installing permanent moorings at dive sites</li> <li>▪ Assessment of the impacts of competing marine uses (e.g., fish farming, bunkering, yachting, etc) and better control of these activities to minimise these impacts</li> </ul>
<p>Low awareness of the regulations and lack of enforcement</p>	<ul style="list-style-type: none"> <li>▪ Low awareness of the existing regulations (Conservation Areas / 'No Stopping Zones' - Notices to Mariners)</li> <li>▪ Limited resources to enforce the existing regulations</li> </ul>	<ul style="list-style-type: none"> <li>▪ Raising awareness of the existing regulations, including through training of those involved in the industry and public outreach campaigns</li> <li>▪ Increasing the resources dedicated to enforcement of the regulations</li> </ul>
<p>Low awareness of the importance of marine conservation</p>	<ul style="list-style-type: none"> <li>▪ Low awareness of the importance of conserving marine life and marine habitats, and of the relationship of this with the diving industry</li> </ul>	<ul style="list-style-type: none"> <li>▪ Raising awareness of the marine environment, marine ecology, and of existing environmental designations, as well as emerging designations and management plans</li> <li>▪ Awareness-raising through training of those involved in the industry and public outreach campaigns</li> </ul>

Issue	Main Causes	Possible Solutions
<p><b>Management of the Industry</b></p> <p>State of shore-based infrastructure</p>	<ul style="list-style-type: none"> <li>▪ Inadequate infrastructure for entering / exiting the water in some cases - the number of ladders / railings, etc., available and their year-round availability</li> <li>▪ Lack of suitable changing ('kitting out') facilities</li> <li>▪ Poor amenity (cleanliness and general safety)</li> <li>▪ Poor vehicle and pedestrian access to the sites and inadequate parking at / near the sites</li> <li>▪ Fragmented management responsibility for the provision and maintenance of facilities at dive sites</li> </ul>	<ul style="list-style-type: none"> <li>▪ Prioritising the provision / upgrading of shore-based infrastructure at the most popular dive sites</li> <li>▪ Ensuring the all-year-round presence of at least one means of entering / exiting the water at every dive site, with the access infrastructure being properly designed and installed to withstand storm conditions</li> <li>▪ Improving the security and surveillance at the dive sites most sensitive to vandalism and poor amenity</li> <li>▪ Clarifying the loading / unloading and parking needs at the individual dive sites</li> <li>▪ Clarifying the responsibility for provision and maintenance of shore-based infrastructure, including appointing a single entity having overall responsibility for diving-related infrastructure.</li> <li>▪ Increasing the resources dedicated to providing and maintaining shore-based infrastructure</li> </ul>
<p>Problems accessing certain shore dive sites</p>	<ul style="list-style-type: none"> <li>▪ Access routes to certain dive sites being closed off and access restricted</li> </ul>	<ul style="list-style-type: none"> <li>▪ Establishing agreements / measures, as necessary, to ensure and secure access to designated dive sites around the islands</li> <li>▪ Formal designation of dive sites (establishing official dive sites)</li> </ul>
<p>low levels qualified diving instructors / staff</p>	<ul style="list-style-type: none"> <li>▪ Reliance on foreign diving instructors / staff, with a particular reliance on the UK for staff recruitment</li> <li>▪ Loss of staff during the Covid-19 pandemic</li> <li>▪ Implications of Brexit on freedom of movement, and impact on the recruitment of staff from the UK</li> </ul>	<ul style="list-style-type: none"> <li>▪ Establishing training for dive instructors locally, to increase the availability of local instructors / staff</li> </ul>



### 3. STRATEGIC OBJECTIVES FOR A SUSTAINABLE DIVING INDUSTRY

Even prior to the onset of the COVID-19 pandemic, there was recognition that Malta's diving industry could not be complacent in relying on the strengths that had been attained over the previous decade. Pre-pandemic, it had been expected that competition from destinations such as Egypt / Red Sea, Turkey, and North Africa would heighten, as the political situation in these regions normalised.

The risk of being complacent at this stage, as the global diving industry emerges from the pandemic, is high and there is an essential need to take action to safeguard and develop a sustainable diving industry into the future in Malta.

The Strategy highlights the need for immediate action to improve both the diving resource and the management of the industry, essentially to consolidate in order to ensure that divers continue to be attracted to Malta in the numbers previously experienced (and as competing destinations gear up to attract divers as the industry recovers world-wide).

Continued action in the short and longer-term will guide the industry in a direction that will guarantee that Malta remains competitive in the market and works towards enhancing its competitiveness and increasing the number of divers attracted to the Islands year-round.

#### **Way Forward for the Diving Industry**

The research undertaken by the industry at the onset of the pandemic<sup>50</sup> highlighted marketing being important to ensure that Malta remained competitive and as a destination of choice once the pandemic was over. Investment in the product, to compliment the marketing, was also considered important. The establishment of marine reserves / parks (beginning with Ċirkewwa / Qammieħ), the scuttling of wrecks / deployment of artificial reefs, and the upgrading of infrastructure and facilities at existing dive sites were identified as areas for further investment.

At the outset of the pandemic, the industry highlighted the need for a planned and targeted approach to the recovery of the industry, by Government, the MTA and the PDSA, to maximise the potential of investments already made and to safeguard the industry in the future.

Again, it is clear that these priorities remain relevant. Respondents to the industry questionnaire conducted in June / July 2021 identified the top three priority measures / actions required to support the diving industry, and to enhance Malta's competitiveness post-COVID-19, to be: (i) preserving and protecting the marine environment, (ii) maintaining and enhancing the infrastructure and facilities available at dive sites, and (iii) the management, regulation, and promotion of the industry.

<sup>50</sup> Source: The Impact of Covid-19 on the Diving Industry in Malta 2019 (May 2020). EMCS

Almost all respondents (95%) identified the variety of fish and marine life and water quality to be very important factors in contributing to the quality and sustainability of the diving product. 85% of respondents identified the variety of dive attractions and the infrastructure and facilities available for divers to be very important factors.

Other operational priorities identified by the industry<sup>51</sup>, and considered necessary to aid recovery of the industry, include direct investment by the Government in dive centres, including through assistance in the area of staff recruitment.

Other areas for investment identified include in the 'greening' of the industry.

### **Strategic Objectives**

The Strategy identifies five strategic objectives to guide the sustainable development of Malta's diving industry going forward, and as it emerges from the COVID-19 pandemic. These objectives will be achieved through the implementation of short-term and longer-term actions. An Implementation Plan for execution is included in **Section 4** below.

Where the longer-term actions reflect analysis of the industry as it is currently, there will be the need to periodically review these actions, to take account of trends and changes in the industry internationally and locally.

- **Objective 1: Upgrade the essential infrastructure at the dive sites**
- **Objective 2: Improve the protection and management of the dive sites and the diving resource**
- **Objective 3: Improve the regulation of the diving industry**
- **Objective 4: Support the industry in the training and recruitment of staff**
- **Objective 5: Diversify the diving product**

#### **Objective 1: Upgrade essential infrastructure at the dive sites**

##### **Action: Undertake the necessary infrastructural improvements at the shore dive sites**

The site surveys conducted to inform the Strategy identified the priority interventions required to ensure the sustainability of the shore dive sites.

These surveys were conducted in June / July 2021 and informed the identification of the infrastructure interventions for each shore dive site. The responses to the industry questionnaire similarly conducted over June and July 2021 also served to identify what

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<sup>51</sup> Information derived from discussions with the Professional Diving Schools Association Malta in October 2021

is required. Table 3.1 summarises the infrastructure interventions for the shore dive sites, where the interventions are categorised as being of high, medium, or low priority. Notably, as mentioned, the MTA and the MGOZ have subsequently undertaken a number of interventions at the shore dive sites, such that some of the proposed interventions might have already been implemented in the meantime.

**Action: Assess what is required to establish permanent mooring buoys at the boat dive sites**

The consultations conducted to inform the Strategy have identified the need for infrastructural improvements to ensure the sustainability of the most popular boat dive sites. As a priority, there should be the provision of permanent mooring buoys, especially at the more environmentally sensitive sites, including those sites where anchoring activities have been identified as being particularly harmful. These sites are: the HMS Southwold (MB07); Le Polynésien (MB08); HMS Stubborn (MB16), and Miġra l-Ferħa (MB11); Ras l-Irġieqa (CO06); the Patrol Boat P31 (CO10); the Santa Marija Caves / Comino Caves (CO02); Mġarr ix-Xini (GS04); and around Fungus Rock, Dwejra (GS06). The MTA (in consultation with other relevant government entities, such as ERA / TM), will assess the requirements for the deployment and maintenance of such infrastructure.

Different mooring systems can be employed for different circumstances, accounting for different seabed characteristics. Additionally, the mooring buoys may require illumination, where they are in the vicinity of busy ship transit lanes, for example, around the Grand Harbour or, alternatively, be submerged without hindering maritime traffic.

Early consultation on the detailed design, location, management, and long-term maintenance of moorings buoys will be necessary.

Protection from anchoring will also be an important consideration for the future management plans to be developed for the Marine Protection Areas (MPAs) / marine Natura 2000 sites. The deployment of permanent mooring buoys should be linked to the declaration of 'No Anchor Zones', especially in areas rich in *Posidonia oceanica* meadows and maerl grounds.

**Action: Assess what shore-based infrastructure is required to support boat diving**

The industry identifies an issue with the lack of access to jetties / quays for dive boats, because of competing interests (tour / cruise boats and fishing boats, for example), as well as a general lack of mooring facilities on the coast.

Furthermore, the industry considers that the problems of overcrowding on the shore at the more popular dive sites in the summer season could be part way addressed by increasing access to these sites by boat. This would give further justification to improving access to jetties / quays for dive boats.

The situation could be improved by establishing priority times for dive boats at strategic locations, for example, Sliema / Għira, St Paul's Bay / Buġibba, Mellieħa and Marsaskala in Malta, and Marsalforn, Xlendi, and Mġarr in Gozo.

There may also be the need, following this initial analysis, to consider the provision of new jetties / quays to accommodate the diving industry in the longer term. The Strategy envisages an assessment of the needs of the diving industry in this regard.

Table 3.1: Proposed Interventions at Shore Dive Sites

Designated Dive Site Reference	Designated Dive Site	Replace handrails	Install new handrails	Replace existing ladder/s	Install new ladder/s	Improve steps
<b>MALTA</b>						
MS01	HMS Maori, St Elmo	M				
MS02	SS Margit, Kalkara Creek				M	
MS03	Mini Blue Hole, Marsaskala				M	
MS04	Żonqor Point					
MS05	East Reef and South Reef, Delimara Point					
MS06	East Reef, West Reef and Caves, and Um el Faroud, Żurrieq					
MS07	Għar Lapsi					
MS08	Black John, Għar Lapsi		M			
MS09	Anchor Bay				M	
MS10	Ċirkewwa					
MS11	Dahlet ix-Xmajjar					
MS12	Qawra Point North					
MS13	Tug 2, Exiles	H				
MS14	Fortizza Reef and Coral Garden, Sliema					
MS15	X127 Lighter, Manoel Island					
<b>GOZO</b>						
GS01	Xatt I-Aħmar					
GS02	Xatt I-Aħmar Wrecks				H	
GS03	Ras il-Ħobż				M	
GS04	Mgarr ix-Xini				M	
GS05	Xlendi Bay					
GS06	Dwejra					
GS07	Inland Sea, Dwejra					
GS08	Wied il-Mielah			H		
GS09	Wied il-Għasri					
GS10	Billingshurst Cave, Żebbuġ					
GS11	Reqqa Point, Żebbuġ					
GS12	Anchor Reef	M	M			
GS13	Double Arch, Żebbuġ					
GS14	Xwejni Bay, Żebbuġ					
GS15	Outer Marsalforn Bay					
GS16	Dahlet Qorroġ, Nadur					
GS17	Ħondoq ir-Rummien, Qala					

Provide new steps	Improve kitting up facilities	Provide new kitting up facilities	Provide signage and interpretation	Provide litter bins	Delimit and manage access and parking	Provide dedicated parking / unloading bays	Install CCTV cameras	Improve access road	Improve footpath(s) / walkway(s)	Remove dangerous features	General clean up	Provide mobile toilets
		H	H			M						
			H			L						
			M					M				
						M	M		M			
		H	M			M						
		H				M						
			M									
		M				M		M		M	M	
			M	M								
	M					M						
			L									
		M										M
	M						H					M
		M			M			M				
			M					M	M			
			M							M		
		M	H			M	H					
						M						
				M								M
			M		M			M	M			
			M	M			M					M
			H	H			H				H	M
				M								
		M	M									M
			L									
		M				M						

**Objective 2: Improve the protection and management of the dive sites and the diving resource**

**Action: Formally designate the official dive sites**

The Strategy envisages the formal designation of the most popular recreational shore and boat dive sites (identified in **Figure 2.1**), to be referred to as 'Designated Dive Sites', and in order to recognise their importance to the sustainability of Malta's diving industry.

There is an array of benefits that will be derived from the formal designation of the most popular dive sites. These include:

- Raising the profile of the diving industry as an essential and growing strand of Malta's tourism offer;
- Enhancing environmental protection, where designation of the dive sites together with the Marine Reserves envisaged (see below), will ensure the protection of the marine life and marine habitats, which are a critical element of their attractiveness;
- Raising awareness of the sites, thereby also working towards enhancing environmental stewardship and compliance with the regulations that control competing activities;
- Giving greater weight to the regulatory powers that control competing activities and facilitating enforcement of the regulations;
- Formalising the status of the dive sites in the context of land use planning policy (local plans, and subsidiary plans, as relevant) and environmental policy (including the monitoring plans envisaged for the MPAs), which could serve to simplify the procedures for maintaining and upgrading the infrastructure at the dive sites.
- Indicative boundaries for each of the Designated Shore Dive Sites are included in the individual dive site reports available in supporting documentation to the Strategy. The Strategy does not identify boundaries for the Designated Boat Dive Sites; however, these may be identified in the future.

The extent of the proposed boundary in the case of the Designated Shore Dive Sites differs for each site, taking account of the specific characteristics of the site. The smallest designation, at Wied il-Mielatħ, covers an area of 5,731 m<sup>2</sup>; the largest designation is at Delimara and covers an area of 0.64 km<sup>2</sup>).

The Strategy envisages the control of activities that can take place within the Designated Shore Dive Sites, specifically where boats will be prohibited from entering the area. This goes further than the regulations currently in force at the wreck dive sites under the Notices to Mariners (through the Conservation Areas / 'No Stopping Areas') but is designed to control the impact of fishing and indiscriminate anchoring, as well as to enhance the safety and enjoyment for divers (in a similar manner to the controls currently in place in relation to the designated 'Swimmer Zones').

As mentioned, 12 of the recreational dive sites are covered by the Notices to Mariners. In the case of the Designated Shore Dive Sites, it is envisaged that the Conservation Areas / 'No Stopping Areas' will be supplemented by the new regulations taken forward for these sites.

In the case of six of the Designated Shore Dive Sites, the designations partly overlap with the 'Swimmer Zones' designations. Hence, these areas already benefit from regulations where fishing (with the exception of shore fishing) and boat activity is prohibited.

**Action: Establish Marine Parks**

The low level of marine life has been identified to be the primary weakness of Malta's diving product, and the Strategy envisages the taking forward of a number of actions aimed at increasing (or at least sustaining) fish stocks and other marine life at the most popular dive sites.

These actions relate both to raising environmental awareness and to the management and the enforcement of regulations to control fishing and anchoring; they include establishing, and regulating for, the Designated Dive Sites referred to above.

There is a general recognition, however, that establishing larger 'Marine Parks' around the most sensitive and threatened of the most popular of the Designated Dive Sites (and encompassing a number of dive sites in some cases) would be an effective way of improving Malta's competitiveness.

The 'Marine Park' designation envisages regulatory powers through the eventual preparation of a management plan for each park, and with the main aim being environmental protection, in particular of fish stocks, which are the primary attractions for the diving industry. This management plan would include actions to survey and monitor the quality of the environmental habitat and marine life within the park, as well as actions to sustain and restore the habitat and marine life as necessary.

It is also envisaged that the management of the Marine Parks will be the responsibility of site-specific wardens / rangers.

The establishment of Marine Parks will have the additional benefit of supporting the existing environmental designations and affording areas outside the MPAs, Special Areas of Conservation (SACs), and other marine designations a level of environmental protection. Another benefit is that of enhancing Malta's eco-tourism profile, with dive sites marketed as being within a Marine Park.

Establishing Marine Parks will also benefit the fishing industry in the longer term, as fish populations spill over into the areas adjacent to the Marine Parks, where fishing would be permitted. Where Marine Parks exist abroad, it has been demonstrated that fishermen ultimately benefit from the curbing of over-fishing, and in a relatively short time (for example, see: Hilborn *et al.*, 2004<sup>52</sup>; Shiple, J.B., 2004<sup>53</sup>; Sanchirico *et al.*, 2006<sup>54</sup>; Hart, D.R., 2006)<sup>55</sup>.

52 Hilborn, R., K. Stokes, J.J. Maguire, A.D.M. Smith, L.W. Botsford, M. Mangel, J. Orensanz, A. Parma, J. Rice, J. Bell, K.L., Cochrane, S. Garcia, S.J. Hall, G.P. Kirkwood, K. Sainsbury, G. Stefansson, C.J. Walters. 2004. When can marine reserves improve fisheries management? *Ocean and Coastal Management*: 47/3-4:197-205

53 Shipley, J. Brooke. 2004. Aquatic Protected Areas as Fisheries Management Tools. *American Fisheries Society, Symposium 42*, Bethesda, Maryland. 299p

54 Sanchirico, J.N., U. Malvadkar, A. Hastings, and J.E. Wilen. 2006. When are no-take zones an economically optimal fishery management strategy? *Ecol. Appl.* 16:1643-1659

55 Hart, D.R. 2006. When do marine reserves increase fishery yield? 2006. *Can. J. Fish. Aquat. Sci.* 63:1445-1449

As mentioned, a management plan is currently being prepared for the Ċirkewwa / Qammieħ (Malta) Marine Park, where Nature Trust-FEE Malta has been given responsibility for the management of the Park. The Strategy recommends a number of additional potential Marine Parks at:

- St Julian's Point to Fortizza, Sliema (Malta);
- Żonqor Point (Malta);
- Delimara Point to Il-Ħofriet (Malta);
- Ras San Dimitri (Gozo);
- Xlendi (Gozo);
- Wied il-Għasri to Reqqa Point (Gozo); and
- Comino - the coastal waters all around the island and up to approximately 200 m from the shoreline<sup>56</sup>.

The area of Mġarr ix-Xini and il-Kantra, in Gozo and the area around Filfla are already protected as Special Areas of Conservation (SACs). The priority here is to establish the management regime for these SACs, where site-specific wardens / rangers are also envisaged. These Marine Parks / Marine Protected Areas, are not necessarily to follow the model used at Ċirkewwa and may have a more environmental raison d'être; and, hence, may not necessarily require the input of the MTA.

**Action: Appoint a single entity with overall responsibility for the provision and maintenance of infrastructure at Designated Shore Dive Sites in Malta**

There is a fragmented approach currently to the provision and maintenance of infrastructure at the shore dive sites in particular, and in Malta especially.

In Malta, as mentioned, the provision of infrastructure to facilitate divers getting into / out of the water is the responsibility of the MTA (contracted out to either the Government Works Department or the PDSA). Where dive sites are close to Swimmer Zones, and ladders / railings are shared with swimmers, the Cleansing and Maintenance Division (Beach Cleansing Unit) of the Ministry for Tourism, as well as certain local councils, also have the responsibility.

In Gozo and Comino, the responsibility for providing infrastructure for accessing the water lies with the MGOZ.

There is a clear need for the simplification of responsibility for the provision and maintenance of infrastructure at the shore-based dive sites in Malta in particular, including through the appointment of one managing entity.

The Strategy envisages the review of the current management arrangements for the provision and maintenance of infrastructure at the Designated Shore Dive Sites, and the appointment of a single entity with overall management responsibility. This entity would have overall responsibility for managing the infrastructure at the dive sites, including the putting in place of new / replacement infrastructure as necessary, and to ensure that the infrastructure remains fit for purpose over time.

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<sup>56</sup> The area identified in the Gozo and Comino Local Plan 2006 and recognised in the MPA designation.



**Action: Ensure the year-round availability of infrastructure for entering / exiting the water at Designated Shore Dive Sites**

As mentioned, and since the consultations with the diving industry, the MTA has invested in installing properly designed, year-round infrastructure, including to facilitate access to the sea. Nevertheless, the situation whereby ladders / railings facilitating access to the sea are removed after the summer season at some sites, significantly hampers diving year-round.

The Strategy envisages that the MTA builds on its current programme to provide properly designed and durable infrastructure in at least one location at each Designated Shore Dive Site. This would facilitate diver entry to and exit from the water all year round.

**Action: Improve safety and facilitate the management of the Designated Shore Dive Sites**

Where problems of vandalism and theft (including from vehicles) have been identified as problems at many dive sites, web-based technology, and particularly Closed-Circuit Television (CCTV) cameras, have the potential to improve safety and facilitate the better management of these sites.

There are a number of dive sites where the installation of cameras could significantly improve security for divers and dive trucks. CCTV cameras could also be used to provide information to dive centres, divers (and swimmers), such as real-time wave and weather conditions, as the potential of which is also addressed in the context of a broad web-based management regime under **Objective 4** below.

The Strategy envisages the installation of CCTV cameras at the following dive sites: Ċirkewwa (MB10); Żonqor Point (MS04); Billingham Cave (GS10); Reaqa Point (GS11); Dwejra - Blue Hole (GS06); and Xatt L-Aħmar (GS01 and GS02).

**Action: Undertake the necessary action to ensure and secure access to shore dive sites**

A recent issue has come to the fore in the matter of divers experiencing problems accessing certain dive sites.

The issue of divers being unable to gain access to certain dive sites may require interventions that lead to the obtainment of measures that ensure and secure access for divers to the designated dive sites. As necessary, there should be agreements and appropriate measures put in place to ensure and secure shore access for divers to such important dive sites.

The formal designation of the dive sites also envisaged under **Objective 2** may also serve to ensure and secure access into the future.

**Action: Promote environmental stewardship within the industry**

The Strategy recognises the need to raise awareness within Malta's diving industry, where the industry is wholly reliant on the quality of the marine environment.

Whilst the more responsible of the dive centres already acknowledge the intimate

relationship between the marine environment and the continued success of the industry, there is a recognised need for awareness-raising within the industry.

Accordingly, it is important that the dive industry operators (dive centres, individual dive instructors, dive boat operators, and boat crew) are trained to understand the potential impacts of their activities on the marine environment (and sensitive terrestrial environments in the case of shore dive sites), the current environmental and operational regulatory powers, and their own responsibilities in respect of adhering to and implementing the regulations.

Similarly, foreign instructors who visit Malta to work periodically with the dive centres should also be required to attend such training courses.

The Strategy envisages the establishment of a 'Code of Practice' and 'Standard Operating Procedures' for the diving industry in Malta, to apply to all those involved in the industry (including dive boat operators / skippers and crew not affiliated with a dive centre). The Strategy also envisages that there be an environmental stewardship scheme for divers / dive centres.

Furthermore, and in respect of training, the Strategy envisages an on-going environmental awareness training course for divers and diving instructors, including visiting instructors in Malta on a temporary basis. This training course could be developed through the collaboration of the MTA, ERA, MGOZ, the PDSA and the individual dive centres. The Institute of Tourism Studies (ITS) has recently launched a new Bachelor of Science in Diving Safety Management, covering the management aspects of the industry (business elements and human resource management, health and safety and risk assessment, and the technicalities of diving equipment). There is the potential for the ITS prospectus to be expanded to include environmental awareness within the diving industry.

**Action: Raise awareness of the regulations in force at Designated Shore Dive Sites**

There is widespread recognition that there is both a lack of awareness of the current Conservation Areas / 'No Stopping Areas' in force under the Notices to Mariners, and a lack of enforcement of the regulations. The latter is addressed directly under **Objective 3** below.

With the establishment of Designated Shore Dive Sites, the Strategy envisages regulations which go further than those currently in force under the Notices to Mariners. In respect of awareness-raising, the Strategy also envisages awareness-raising amongst fishermen and the diving industry, including dive boat operators, of these new regulations and in advance of them coming into force.

Raising awareness generally, amongst all boat owners / operators, and especially those involved in boat excursions, would also serve to protect sensitive dive sites, as well as the safety of divers.

Where awareness-raising of the new regulations may take some time, and in the meantime, it is envisaged that there will be awareness-raising of the current regulations in force within the existing Conservation Areas / 'No Stopping Zones'.

Raising awareness of the regulations will include a requirement on the operators of dive

boats to become trained (and certified) on procedures and practices to be employed

during boat dives. The certification could cover basic diver safety and could be required periodically (annually or biannually).

**Objective 3: Improve the regulation of the diving industry**

The Recreational Diving Regulations ensure industry-wide adherence to safety standards, providing a level of quality assurance in Malta that is not matched at many of the competing destinations. Nevertheless, there are a number of actions that could improve the industry in respect of its regulation.

**Action: Strengthen the enforcement of the provisions of the Notice to Mariners establishing Conservation Areas / 'No Stopping Areas'**

There is widespread recognition of limited enforcement of the regulations currently in force under the Notices to Mariners, mostly due to lack of resources / personnel.

The responsibility for enforcing the regulations of the Notices to Mariners lies with both TM and the Department of Fisheries and Aquaculture, with the monitoring of the Conservation Areas / 'No Stopping Areas' conducted by the Armed Forces of Malta (AFM) and the Administrative Law Enforcement (ALE) section of the Malta Police Force.

The Strategy envisages clarifying the management responsibilities for the regulations, and increased capacity to ensure adequate enforcement of the regulations, including through the appointment of wardens / rangers for the Marine Parks (see **Objective 2** above).

**Objective 4: Support the industry in the training and recruitment of staff**

**Action: Establish a training course(s) for dive instructors / dive staff locally**

The COVID-19 pandemic has resulted in the loss of a substantial number of qualified, primarily foreign dive instructors and other foreign staff from the dive centres. As the industry recovers, this loss has been exacerbated by the coming into force of the Brexit freedom of movement restrictions, affecting recruitment from the UK, where the dive centres are heavily reliant on the UK for recruitment of dive instructors, in particular. There is a lack of qualified instructors locally.

The Strategy envisages establishing the facility to train dive instructors locally. Where the ITS now offers a Bachelor of Science in Diving Safety Management, there is the potential for expansion of the prospectus to include training for diving instructors.

**Objective 5: Diversify the diving product**

The gap analysis revealed that Malta was competing well with its primary competing destinations prior to the onset of the COVID-19 pandemic. Nevertheless, the potential to expand and diversify the dive product in Malta must be considered to enhance the industry's competitiveness as it emerges from the pandemic, and with the aim of sustaining the industry going into the future.

**Action: Provide new dive attractions**

The previous diving masterplans advocated the creation of new dive sites through the scuttling of wrecks, and six new wrecks have been scuttled since the preparation of the

2006 masterplan for Gozo and Comino. This has significantly improved the diving product in this sense.

Furthermore, the opening in 2019 of a number of underwater archaeological zones, comprising historic wrecks for diving against a special permit, has also improved the diving product for technical diving.

The Strategy now moves away from the former approach that promoted scuttling of wrecks in shallow waters. Although not precluding scuttling altogether and considering that a new dive wreck<sup>57</sup> is planned to be scuttled in 2022, it is generally considered that there is sufficient attraction in relation to this type of diving to sustain Malta's competitiveness going forward.

In addition to the planned scuttling of the MT Hephaestus, the potential for further scuttling would only be actively promoted in the case of an extraordinary attraction (very large vessel, historic wreck, or vessel of a similar calibre) and at a site well offshore and in deep water (subject to clearance from a navigational point of view), and ideally in areas that are not currently popular for diving (and away from environmentally sensitive sites). One such site could be off Dohlet Qorrot in Gozo (subject to further assessment in the event that a suitable wreck is identified).

The Strategy does however envisage the promotion of new dive attractions in the form of appropriately designed and located artificial reefs, where artificial reefs can promote fish stocks and increase marine life generally. This will necessitate the identification of suitable sites, in consultation with the relevant entities, ERA and TM.

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57 The MT Hephaestus is planned to be scuttled off Gozo's south coast.



The decision on the precise location of the site for any artificial reef will be informed by the necessary detailed technical studies, including the assessments conducted for the development of the management plans for the MPAs and project-specific Environmental Impact Assessment.

Artificial reefs would have to be guided by scientific parameters, be properly designed and constructed to aid the attraction of fish species and to enhance production. Reefs would typically be constructed out of concrete to specific designs. Extensive experience exists from various Mediterranean countries in this sense, with different shapes / designs developed to attract specific fish species.

The Strategy envisages that the MTA works with the University of Malta, the ERA, and dive industry stakeholders to identify the appropriate types of artificial reef that could best facilitate the enhancement of the diving product and the raising of Malta's profile as a diving destination.

**Action: Employ web-based technology to improve the diving offer**

Web-based technology generally could also be employed to provide information to divers (and swimmers), such as real-time wave and weather conditions (electronic spy glass), and for divers to provide feedback on the quality of the dive site and their enjoyment of the diving experience.

Online facilities could be synced for compatibility with 4G / Smart Phones to allow for streaming of weather conditions to phones, geo-caching of under-water trails / features, etc.

A network of cameras at dive sites could also provide information to dive centres to assist in day-to-day management, including on-site usage and overcrowding (whether the car park is full, for example). The use of a coordinated on-line system could be a platform for dive centres (and individual divers) to report illegal activities at dive sites in real time, enhancing enforcement mechanisms.

Such a web-based system will likely require significant capital investment. The MTA is keen to explore potential funding sources. However, a pilot project could be pursued to gauge likely usage, and to fully explore all the potential benefits, at Ċirkewwa (MS10), for example. This could then be rolled out to the other popular dive sites – for example, SS Margit, Kalkara Creek (MS02); Għar Lapsi (MS08); HMS Maori, St Elmo (MS01); East Reef, West Reef and Caves, and Um el Faroud, Zurrieq (MS06); Xwejni Bay, Żebbuġ (GS14); Reqqa Point (GS11); Dwejra - Blue Hole (GS06); Inland Sea, Dwejra (GS07); and Xatt L-Aħmar (GS01 and GS02).

**Action: Explore the potential for developing the technical diving market**

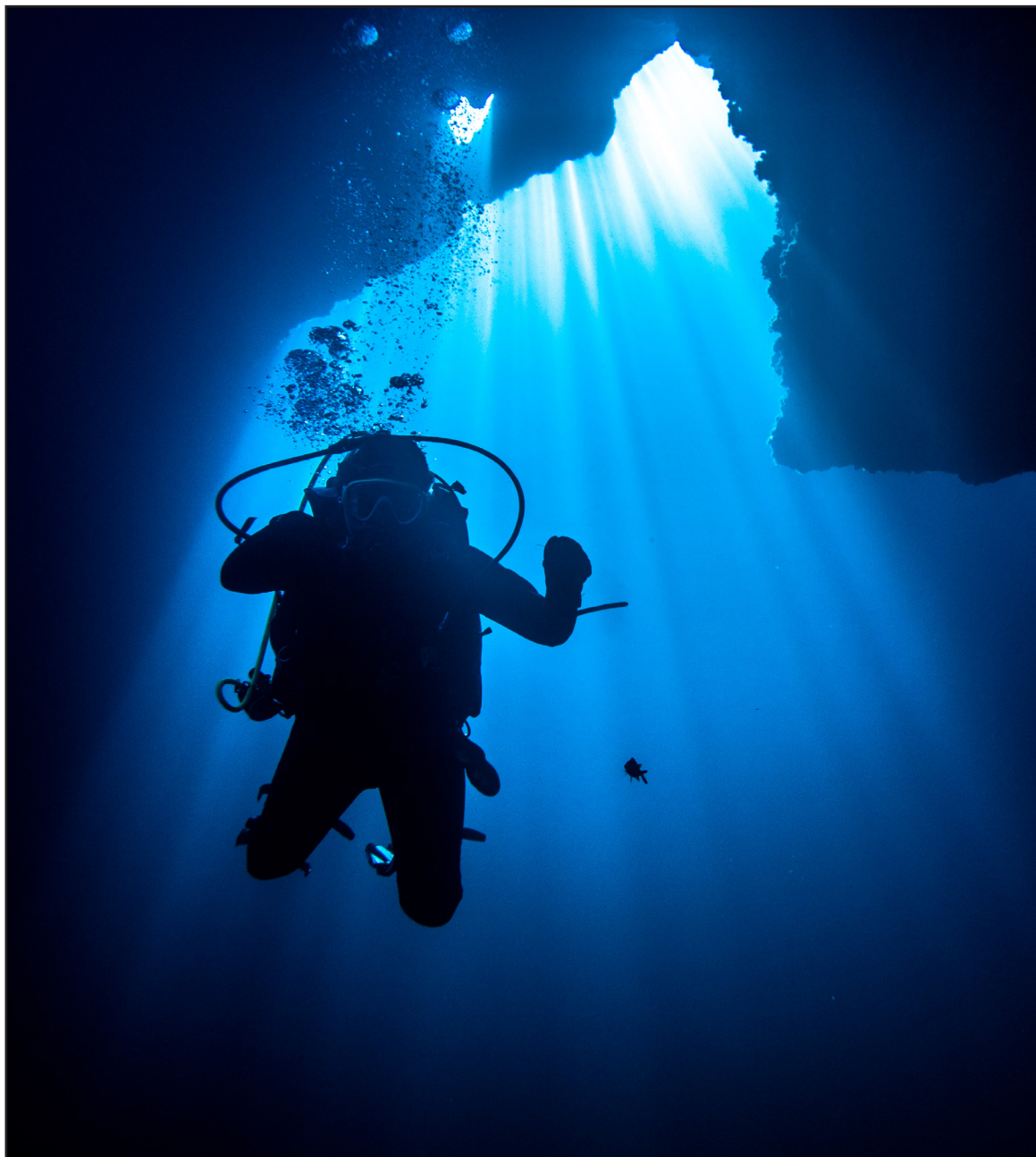
As mentioned, prior to the onset of the COVID-19 pandemic, there was a growing interest in more technical diving in Malta, attracting experienced divers with specific interest in diving at depth<sup>58</sup>. Emerging from the pandemic, the diving industry in Malta considers technical diving to present one of the most important opportunities for product diversification and for enhancing Malta's competitiveness in the European market in particular.

<sup>58</sup> At depths below 50 m, where there is a requirement for the use of mixed gases

The Strategy does not address technical diving in detail. However, in the context of product diversification, the Strategy recognises the benefits of diversification of the industry in this regard in the shorter rather than the longer-term, and as a way to enhancing Malta's competitiveness as the industry recovers.

The Strategy therefore identifies the need for further analysis of this element of the dive market and the preparation of a specific working document addressing the development of a sustainable technical diving industry.

The opening, in 2019, of a number of archaeological zones at sea comprising historic wrecks for diving purposes was an important first step in this regard. These sites are all technical dives, with the wrecks located at considerable depths in excess of 60 m. Diving at these sites requires a special permit from Heritage Malta.



## 4. STRATEGY IMPLEMENTATION

### Implementation Plan

The Strategy for a sustainable diving industry in Malta envisages a programme of actions to take the industry forward, designed to address the issues identified as necessary to improve the diving product, as well as the challenges in enhancing competitiveness as a top diving destination as Malta emerges from the COVID-19 pandemic.

The Strategy Implementation Plan, taking account of the identified strategic objectives for Malta's diving industry, is outlined in **Table 4.1**.

### Implementation Responsibilities

The Implementation Plan identifies the relevant agencies to be involved in its implementation. These include the MTA and the MGOZ, as well as a range of implementation partners. There are a number of implementation partners, taking account of the range of actions to be implemented.

The key implementation partners are: the Planning Authority (PA); the Environment and Resources Authority (ERA); Transport Malta - Ports and Yachting Directorate (TM); the Department of Fisheries and Aquaculture; and the Professional Diving Schools Association Malta (PDSA).

Other entities important for implementation of the Plan are the individual dive centres, dive clubs and the wider diving community, as well as the Federazzjoni tal-Għaqdiet tas-Sajjeda Dilettanti Malta, Federation of Underwater Activities Malta, and the Malta Skin Diving Club. The MTA will have overall responsibility for coordinating the implementation of the Plan. This will include actively assisting the industry in accessing funding where projects relate to actions identified in the Plan.

The MTA will have primary involvement in respect of marketing the industry and in implementing the Recreational Diving Regulations (LN 359 of 2012. S.L. 409.13).



Table 4.1: Strategy Implementation Plan

Action	Time Frame		Action by
	Short-term Action	Longer-term Action	
<b>Objective 1: Upgrade the essential infrastructure at the dive sites</b>			
<b>Undertake the necessary infrastructural improvements at the Designated Shore Dive Sites</b>	Infrastructural improvements at the Designated Shore Dive Sites as identified for priority action in <b>Table 3.1</b>	Infrastructural improvements at the Designated Shore Dive Sites as identified for all remaining sites in <b>Table 3.1</b>	MGOZ and the MTA, in liaison with the PA and ERA
<b>Assess what is required to establish permanent mooring buoys at the Designated Boat Dive Sites</b>	Analysis of what is required to install permanent mooring buoys at all Designated Boat Dive Sites.	Permanent mooring buoys to be provided at the Designated Boat Dive Sites, with the priority sites for action being: HMS Southwold (MB07); Le Polynesien (MB08); HMS Stubbarn (MB16), and Migra i-Ferħa (MB11); Ras l-Irjaqqa (CO06); the Patrol Boat P31 (CO10); the Santa Marija Caves / Comino Caves (CO02); Mgarr ix-Xini (GS04); and around Fungus Rock, Dwejra (GS06).	MGOZ and the MTA, in liaison with the PA, ERA and TM
<b>Assess what shore-based infrastructure is required to support boat diving</b>	Analysis of the potential for establishing priority times for dive boats at strategic locations (Sliema / Gzira, St Paul's Bay / Bugibba, Mellieħa, and Marsaskala in Malta, and Marsalforn, Xlendi, and Mgarr in Gozo)	Assess the need for provision of new jetties / quays to accommodate the diving industry, as necessary	MGOZ and the MTA in liaison with the PA, ERA and TM
<b>Objective 2: Improve the protection and management of the dive sites and the diving resource</b>			
<b>Establish Designated Dive Sites</b>	Establish boundaries for the Designated Shore Dive Sites	Establish boundaries for the Designated Boat Dive Sites	MGOZ and the MTA in liaison with the PA, ERA and TM



Action	Time Frame		Action by
	Short-term Action	Longer-term Action	
<b>Objective 2: Improve the protection and management of the dive sites and the diving resource</b>			
<b>Establish Marine Parks</b>	Formulation of the Management Plan for the Marine Park encompassing the stretch of coastal waters from Ċirkewwa to Qammieħ, Malta	Identification and subsequent establishment of the additional Marine Reserves at: St Julian's Point to Fortizza, Sliema (Malta); Żonqor Point (Malta); Delimara Point to Il-Hafriet (Malta); Ras San Dimitri (Gozo); Xlendi (Gozo); Wied il-Għasri to Reaqa Point (Gozo); and Comino (the coastal waters all around the island)	MGOZ and the MTA in liaison with the PA, ERA and TM and Department of Fisheries and Aquaculture
<b>Appoint a single entity with overall responsibility for the provision and maintenance of infrastructure at Designated Shore Dive Sites in Malta</b>	The entity should have overall responsibility for managing the infrastructure at the Designated Shore Dive Sites in Malta		MTA
<b>Ensure the year-round availability of infrastructure for entering / exiting the water at the Designated Shore Dive Sites</b>	Identify at least one entry / exit ladder or similar infrastructure for retention at each Designated Shore Dive Site		MGOZ and the MTA
<b>Improve safety and facilitate the management of the Designated Shore Dive Sites</b>	Install new Closed Circuit TV systems at Ċirkewwa (MB10)	Install new Closed Circuit TV systems at: SS Margit, Kalkara Creek (MS02); Għar Lapsi (MS08); Xwejni Bay, Żebbuġ (GS14); Reaqa Point (GS11); Dwejra - Blue Hole (GS06); Inland Sea, Dwejra (GS07); and Xatt L-Aħmar (GS01 and GS02)	MGOZ and the MTA
<b>Undertake the necessary action to ensure and secure access to shore dive sites</b>	Assess the situation with regards to access to the Designated Shore Dive Sites, with a view to secure access for divers at all such sites.		MTA and the MGOZ, in liaison with other authorities.

Action	Time Frame		Action by
	Short-term Action	Longer-term Action	
<b>Objective 2: Improve the protection and management of the dive sites and the diving resource</b>			
<b>Promote environmental stewardship within the industry</b>	<p>All those involved in the dive industry (dive centres, dive instructors, including foreign instructors in Malta temporarily, dive boat operators and boat crew) should receive training on the potential impacts of their activities on the marine environment and the current and proposed environmental and operational regulations</p> <p>There should also be a Code of Practice and Standard Operating Procedures for the diving industry in Malta, to apply to all those involved in the industry</p>	<p>There should be an environmental stewardship scheme for divers and dive centres</p>	<p>MGOZ and the MTA, in liaison with ERA and the PDSA</p>

Action	Time Frame		Action by
	Short-term Action	Longer-term Action	
<b>Objective 2: Improve the protection and management of the dive sites and the diving resource</b>			
<b>Raise awareness of the regulations in force which have relevance to the diving industry</b>		<p>There should be an awareness-raising campaign for fishermen, all those involved in the diving industry, and potentially all boat owners / operators involved in boat excursions</p> <p>Raising awareness of the regulations should include a requirement on dive boat operators to become trained (and certified) on the procedures and practices to be employed during boat dives (annually or biannually)</p> <p>This could be established in conjunction with the training course for diving instructors envisaged under Objective 4, and potentially as an expansion of the diving course being offered by the Institute for Tourism Studies (ITS)</p>	MTA, Department of Fisheries, ERA, TM, MGOZ and the PDSA
<b>Objective 3: Improve the regulation of the diving industry</b>			
<b>Strengthen the enforcement of regulations in respect of the 'No Stopping Areas' designated under the Notices to Mariners</b>	In advance of the establishment of the Designated Dive Sites, the management responsibilities for enforcing the regulations under the Notices to Mariners should be clarified		TM and the Ministry for Fisheries and Aquaculture

Action	Time Frame		Action by
	Short-term Action	Longer-term Action	
<b>Objective 4: Support the diving industry in the training and recruitment of staff</b>			
<b>Establish a training course(s) for dive instructors / dive staff locally</b>	This could be established in conjunction with the environmental awareness training envisaged under Objective 2.		MTA and the PDSA in liaison with the MGOZ
<b>Objective 5: Diversify the diving product</b>			
<b>Provide new dive attractions</b>	Pursue scuttling of MT Hephæstus	The potential for the creation of artificial reefs in other locations should be explored and the necessary studies be undertaken to establish the suitability of the sites	MGOZ and the MTA, in liaison with the PA, ERA, TM, the Department of Fisheries and Aquaculture, the Federazzjoni tal-Għaqdlet tas-Sajjeda Dilettanti Malta, and the PDSA
<b>Employ web-based technology to improve the diving offer</b>	The installation of CCTV cameras at the shore-based Designated Dive Sites, linked to a web-based information system for dive centres / divers, should be piloted at one site in the shorter term, for example, Ċirkewwa (MS10)	The installation of cameras at the other popular shore dive sites Żonqor Point (MS04); Billingham Cave (GS10); Reġqa Point (GS11); Dwejra - Blue Hole (GS06); and Xatt L-Aħmar (GS01 and GS02), and potentially all shore dive sites) should be studied further and considered in the longer term once the pilot project is completed and assessed	MGOZ and the MTA
<b>Explore the potential for developing the technical diving market</b>	There should be the preparation of a working document addressing the development of a sustainable technical diving industry		MTA, Underwater Cultural Heritage Unit, TM, PDSA





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OF MALTA

MINISTRY FOR TOURISM  
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