

Italia Nostra's Dossier
on the 2018 Report on the State of Conservation In
accordance with the Decision of the World Heritage
Committee 41 COM.7B.48

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Introduction

Italia Nostra, a national NGO, is Italy's oldest association for the protection of cultural heritage and the environment. It was founded by preeminent Italian intellectuals and officially recognised in 1958 by a Decree of the President of the Republic¹ as an Association that works to protect and promote Italy's historical heritage; Italia Nostra was also recognised by a 1987 Decree of the Minister of Environment as an association for environmental protection².

In 2011 and 2012, Italia Nostra sent UNESCO three letters to inform the World Heritage Committee that the preconditions for maintaining *Venice and its Lagoon* on the World Heritage List no longer exist, due to the lack of protection for the site on the part of the Italian government and local administrations.

Following our warnings, the World Heritage Committee, in its *Decision 38 COM 7B.27*, sent a Reactive Monitoring mission to the World Heritage Site *Venice and Its Lagoon* (October 2015) and, in the subsequent *Decision 40 COM 7B.52*, set out eight recommendations that the Italian state had to meet.

Decision 40 COM 7B.52 also requested the State Party to provide a detailed report on the state of conservation of the property and the implementation, by 1 February 2017, for examination by the World Heritage Committee at its 41st session in 2017. The *2018 Report on the State of Conservation according to the World Heritage Committee Decision 40 COM.7B.52* (hereinafter the *2017 Report*), however, was not prepared by the State Party, which had this responsibility according to the obligations assumed when the site was inscribed in the World Heritage List, but by the Municipal Council of Venice.

The following *Decision 41 COM.7B.48* of the World Heritage Committee indicated an interest in the commitments set out in the *2017 Report*: it requested the State Party to provide by 1 December 2018 another detailed report on the state of conservation of the property and the implementation of measures, for examination by the World Heritage Committee at its 42nd session in 2019. The *Decision* thus allowed the State Party two years to define actions for the protection of the site before a further review and decision whether to include Venice in the Danger List.

The *2018 Report on the State of Conservation In accordance with the Decision of the World Heritage Committee 41 COM.7B.48* (hereinafter the *Report*), as the the *2017 Report*, was not written by the State Party but once again buy the Municipal Council of Venice.

Consequently, the Italian State did not fulfill its formal obligations and did not respond itself, neither to the request in *Decision 40 COM.7B.52* nor that in *Decision 41 COM.7B.48*.

Our national association has nonetheless decided to respond to the *2018 Report* with a series of precise Observations, even though this *2018 Report* does represent the interests of the State Party, nor of the site of *Venice and its Lagoon*, but rather the (legitimate) interests of a very large municipality, of which the territory falling under the protection of UNESCO constitutes only a part.

The Mayor of Venice in fact administers the 15th largest local government in terms of territory, in which Venice itself is only a small urban area compared to the mainland. This is the result of the union of Venice and Mestre (the mainland city) when Italy was under Fascism. Since that period, the dimensions of the Lagoon and mainland populations of Venice have reversed. In 1927, the inhabitants of Mestre and other parts of the mainland were only 37,419 while the Venetians numbered 159,262; today, there are 179,539 mainland inhabitants and (according to the official data of 31 December 2017), but Venetians are only 53,799, a minority that is growing ever smaller and risks disappearing if current trends do not change. Venice loses about 800 inhabitants each year.

¹ Decree n. 1111 of 22 August 1958.

² According to the of the Law no. 349, Article 13, of 8th of July 1986.

The local political leaders are thus the expression of the electoral choices of the majority who live on the mainland and who, on the one hand, may not know Venice itself – or, may even gain advantage from using Venice as an economic resource³.

The Mayor of Venice also has the role of “Metropolitan Mayor”, that is he is the head of an even larger administrative area (which replaced the former Provincia of Venice), bringing together the City of Venice with 44 mainland municipalities that have profoundly different interests from those of Venetians.

Consequently, it is not by chance that the *2018 Report* presents a mainland viewpoint, even in the terms it uses for Venice – terms not used by Venetians. It refers to the «old town» (*«città antica»*, pp. 29 and 55), to the «island city» (*«città insulare»*, p. 58) and «historical centre» (*«centro storico»*, p. 57). This last term makes clear the vision that the administrators have of Venice: it is the centre of the mainland city of Mestre. Instead, Venice is a city whose periphery is the Lagoon and its islands, not Mestre – which is another city. Le Corbusier wrote: «Venice is a city that has been completed, because, and only for this reason, it is built on the water: it is surrounded by the water»⁴.

And not only in the *Report*: many official documents talk about the “city on water” or the “old city” without naming Venice (or Venice). It is necessary to let go of this logic which implies the mistaken idea that there is an old part (or a water part) and a mainland or modern part of the same city⁵. These are instead two different cities.

Venice instead is becoming a specialised neighbourhood of Mestre – and Mestre has not yet found its identity. Both need the formal dignity of a city, with two separate administrations, for their protection and their renewal.

For this reason, in 2013 and 2014, a petition to hold a referendum that would give both Venice and Mestre the role of autonomous municipalities (with both remaining within the larger metropolitan area of 44 municipalities) received 8965 signatures⁶.

The current Mayor, Luigi Brunaro, in fact signed an agreement with another party during his electoral campaign, under which he pledged to hold a referendum on the administrative separation of the two cities if elected (Fig. 1). This pledge was not honoured: in fact, the current City Government as well as the government of the Metropolitan City supported with public money six appeals to the Regional Administrative Court (TAR) against citizens promoting such a referendum to stop it from taking place⁷.

It is thus no surprise that this World Heritage Site is in a poor and deteriorating condition. In 2006 the magazine *National Geographic* conducted a study of the places that UNESCO has declared World Heritage Sites. Of the 830 World Heritage Sites in 2006, 94 were chosen for the study, including

³ For example, a few decades ago the renovation of Piazza Ferretto in Mestre was financed with funds from the Special Law for Venice. The current mayor, having promised during the election campaign the reduction of parking costs in Mestre, in 2015 has established that the financial coverage of the operation would have come from the increase in the cost of the Ztl buses, that is the parking of tourist buses that bring Venice daytrippers coming from across Europe.

⁴ Letter from Le Corbusier to the Mayor of Venice, of the 3th October 1962, Ospedale Civile Venezia, Fondo Atti nuovo ospedale 1959-1977.

⁵ The concept implies many negative consequences, first of all the chance to move over the decades most of the public offices to the ‘mainland’ part of the supposedly ‘one’ city, in doing so leaving empty in Venice entire buildings to Venice ready to be converted into hotels.

⁶ The *Città Metropolitana* (Metropolitan City) is a local authority, planned since 1990, but established only in 2014 by law n. 56/2014 concerning *Provisions on metropolitan cities, provinces, unions and mergers of municipalities* (or “Delrio law”). In regions with ordinary statutes the law has provided for the establishment of 10 metropolitan cities with the same territorial delimitation of the relative province simultaneously suppressed.

⁷ In 1999 the coastal hamlets of Cavallino-Treporti, which were considered sacrificed in the interests of a municipality as vast as the Venetian one, separated by referendum. The ruling of the Veneto Regional Administrative Court no. 864/2018 has adopted the assessments of the Municipality and of the Città metropolitana (Metropolitan City) of Venice, stating that in the municipal capitals of the ten Italian metropolitan cities the municipal boundaries can no longer be reviewed on the proposal of voters, but only by the majority (2/3) of the city council, based on the law on metropolitan cities (No. 56/2014). This authoritarian position is discriminatory if compared to all other Italian municipalities.

Venice and its Lagoon. Venice came in 90th of the 94 sites. The experts' comments weren't published in full, but here is an excerpt: «One gets a sense of the decay of the city everywhere and almost regrets coming as a result of feeling like an accomplice to the deterioration of the city. One does not get any glimpse of the *real* life that people lead»⁸.

Thirteen years later, the situation has grown dramatically worse: « only in the last 10 years, at least 100 small and large buildings, empty and unused, have been transformed into hotels»⁹, «AirBnB out of control in Venice, lodgings doubled in 3 years» reads another headline ¹⁰.

And the Lagoon of Venice – the largest wetlands in the Mediterranean – faces grave problems of erosion caused by ship traffic, despite the restrictions and protections in European and national legislation¹¹. The national Special Laws for Venice call for the restoration of the Lagoon's equilibrium, something that is still possible and feasible (as we describe on p. 70 below). Claiming that this equilibrium is by now lost (as in the *Update*, see p. 69 below) opens the door instead to infrastructure and economic development projects with potentially severe impacts.

Ernesto Galli della Loggia, the Italian historian and academic, wrote in 2015: «Venice is now irremediably a ghost-city, the original of a Disneyland that is equal to its copy»¹².

Venice is truly a ghost city: pollution threatens the health of its inhabitants and corrodes the centuries-old stones; motorboat wakes (*moto ondosò*, as it is called in Venice, the waves and screw wash from motorised boat traffic) disintegrate the embankments and threatens the stability of the buildings; tourism pressures build exponentially and without effective restraints, expelling the inhabitants; our children leave the city that only offers jobs in tourism; the erosion of the Lagoon and highly damaging infrastructure projects are turning this part of the World Heritage site into a sea bay by destroying its morphology.

Venice today is small, peripheral place, squeezed by the economic interests of the hotels, the port and the airport. The Mayor said in 2016, « The future of the City is not Venice, it is Mestre where the people live»¹³; and he confirmed this view in 2017, « The future of Venice is in Mestre »¹⁴; and then repeated it one year later, « our future is in Mestre»¹⁵.

The Mayor's scandalous decision to transfer to Mestre nothing less than the ancient book and manuscript collections of the Correr Museum, after 200 years of history, is very recent. An appeal for the Municipal Council to withdraw the project received consent from 250 scholars from all over the world in one day. A member of the Mayor's political party replies: «I believe that the centre of Mestre deserves the same dignity as the centre of Venice». It certainly has more electoral weight.

Venice instead has always been an example of a large, cosmopolitan city. Le Corbusier defined it as «le plus prodigieux événement urbanistique existant sur la terre» (the most prodigious urban event on earth).

Venice is now a ghost city, but we are not resigned that this has to be the case forever.

For this reason, we are asking UNESCO's help, hoping that it will support Venice and its Lagoon – not the City Government nor the Italian State.

⁸ National Geographic Traveler, <http://traveler.nationalgeographic.com/2006/11/destinations-rated/europe-text/10>. Quoted in P. LANAPOPPI, *Dear Tourist*, Venezia 2012, p. 10.

⁹ nuovavenezia.geolocat.it, 2017 giu. 8.

¹⁰ *Airbnb fuori controllo a Venezia, alloggi raddoppiati in 3 anni: "Basta concorrenza sleale"*, www.veneziatoday.it, 2018 set. 25.

¹¹ The Lagoon of Venice is Site of Community Importance, Sic, e Special Protection Area, Zps, areas set up to protect biodiversity.

¹² E. GALLI DELLA LOGGIA, *Così il turismo è come veleno: Lo Stato salvi Venezia e l'Italia*, «corriere.it», 2015 feb. 17.

¹³ E. TANTUCCI, «*Il futuro è a Mestre? Brugnaro tradisce Venezia*», «nuovavenezia.geolocat.it», 2016 mag. 31.

¹⁴ F. BOTTAZZO, «*Turismo, delocalizzare a Mestre*». *Con 4 hotel rinasce via ca' Marcello*, «Corriere del Veneto», 2017 giu.13.

¹⁵ F. SPOLAOR, *Brugnaro sceglie Mestre "Qui c'è il nostro futuro"*, «Il Gazzettino», 2018 feb. 12.

«At this point, I can only hope that UNESCO finally issues the red card»¹⁶. This is not the statement of a Venetian association or committee but an economist, Professor Jan van der Borg, University of Venice Ca' Foscari, an expert on tourism in Venice.

Italia Nostra calls on UNESCO, on the basis of the evidence that we present in the following pages, to add the UNESCO site *Venice and its Lagoon* to the *Danger List* without further delays and with the goal of rousing the authorities to truly protect the city, its Lagoon and its last remaining inhabitants. Only this way can the major development policies and projects that would damage Venice and its Lagoon be avoided, only this way can we hope that the Italian State and the City Government will change their mindsets, only this way will there hope of avoiding the irremediable loss of a thousand-year old civilisation¹⁷.

On the following pages we present the Recommendations set out in Decision 41 COM.7B.48, followed by reply provided in the *2018 Report* and then our comments. We also refer, for important points, to the *2017 Report*.

¹⁶ “Non c’è alcuna strategia. Comune da cartellino rosso”, «la Nuova Venezia», 2018 dic. 2.

¹⁷ Mario Pirani, after the Doha Convention (Decision 38 COM 7B.27) wrote: «Speriamo che l’allarme UNESCO venga recepito dalle forze politiche nazionali e dal governo che non possono abbandonate le sorti di Venezia» (*Solo l’Unesco in difesa della Laguna*, «la Repubblica», 2014 ott. 13).

DECISION 41 COM.7B.48, RECOMMENDATION NO. 3

«Notes with appreciation that the State Party and all the institutions involved, having recognized the major risks to the property, are working collaboratively and in an engaged manner to protect the Outstanding Universal Value (OUV) of the property».

The *2018 Report* seeks to prove this assumption in four points:

- **Implementation of the Pact for the Development of the City of Venice;**
- **Works of the Steering Committee;**
- **Interventions for the protection of monuments, landscapes and archives;**
- **Other activities of strategic relevance for the conservation of the property.**

We review in detail each of the four points.

- **«Implementation of the Pact for the Development of the City of Venice»**, hereinafter we refer to this agreement as the *Pact*. (*Report*, pp. 13-14. It was signed on 26 November 2016 between the City of Venice and the Italian government, and it promises 475 million Euros for a long series of works in Venice and in the Lagoon

The *Pact* had a distinctly electoral objective¹⁸: The *Pact* had a distinctly electoral objective: it was signed by the head of the national government at the time, Matteo Renzi, in a moment of political difficulty on the eve of a constitutional referendum he sponsored (and that was rejected by the voters). In the months leading up to the vote, Renzi signed a series of pacts with Italian cities (Bari, Cagliari, Catania, Genoa, Florence, Messina, Naples, Palermo, Turin) and also with whole regions (Abruzzo, Apulia, Basilicata, Campania, Lazio, Molise, Sardinia, Sicily). Much of the financing announced in the pacts had already been allocated: for Calabria, “there was no additional financing on top of already allocated European and national funds”¹⁹ ²⁰ and for Milan, “they claimed as news the extension of the M5 [metro line] to Monza, which was practically already in construction »²¹.

In this section we review all the spending lines of the *Pact for Venice*, with the state of work as of 29 October 2018, as provided in *Annex 1 Racc. 3* of the *Report*, along with our observations.

- *Pact*, p. 11: «*Design of infrastructure necessary to resolve traffic in the Canals of St Mark's and the Giudecca for ships above 40,000 gross tonnes*», total cost of EUR 2 million.
As explained on p. 13 of the *Pact*, this infrastructure is the «project entitled “Tresse Nuovo”», a new artificial channel supported by the Mayor to allow large cruise ships to pass through the Lagoon. The government committed to support it without making the necessary reviews or an obligatory environmental impact assessment (EIA) procedure. A few months after the *Pact* was signed, the government abandoned the project in favour of another, dredging the Victor Emmanuel channel.
The *Annex 1 Racc. 3* to the *2018 Report* only mentions “San Giuliano area hydraulic reorganisation design and port channel connections” and “Preliminary works for the excavation of the San Giuliano area channels and port connections” (though it is not possible to understand which projects are being referred to), and to “Railway refurbishment to the access road to the Macro-island First Industrial Zone of Porto Marghera” (total cost, 200,000 Euros). None of which resolves the problem of ship transit.
- *Pact*, p. 11: *Design of urban equalification works and buildings for Mestre station*”, total cost of 3 million Euros, for a “new, elevated train station” in Mestre.

¹⁸ As admitted by the Undersecretary Borletti Buitoni during a public meeting held in the spring of 2017 in the Sala San Leonardo.

¹⁹ M. TRIPODI, *PCdl Calabria, Renzi a Reggio firma patto per la Calabria che è aria fritta*, www.radiogammanostop.it

²⁰ M. TRIPODI, *PCdl Calabria, Renzi a Reggio firma patto per la Calabria che è aria fritta*, www.radiogammanostop.it

²¹ *Il Patto per Milano? L'ennesimo “pacco” di Renzi*, www.politici.openpolis.it

The Mestre station is the most important in all of Northeastern Italy: 85,000 passengers pass through her every day, though it is not functional as there is a lack of public spaces, also outside the station. The square in front of the station is small and parts of the public area of the square were granted, for free, to the Bologna Hotel in 2013 and the Plaza Hotel in 2014. Moreover, the station's tracks separate the urban fabric of Mestre from that of Marghera, and for some time urban planners have proposed a reconnection via an elevated structure with commercial activities.

In March, the Municipal Council gave the Mayor a mandate to sign an accord with the company *Grandi Stazioni* (which operates Italy's largest train stations) for the "Requalification of the urban area around the train station of Mestre and the construction of a connecting structure between Mestre and Marghera". The accord does not guarantee what it promises, however: it does not affect the station's main building, it does not guarantee a connection between Mestre and Marghera with the construction of a connecting structure – instead, it foresees two, 80-metre-high skyscrapers destined for hotels and shopping over one-third of the public square. This project is even more absurd considered that the two towers are not required to create a connecting structure between Mestre and Marghera. The objective of this "connecting structure" (for which there are not funds) appears to be only an excuse for the construction of major new buildings.

The Annex 1_Racc. 3 to the 2018 Report doesn't mention the funds for the train station.

- *Pact*, p. 11. *Interventions for the significant maintenance (dredging of canals), acquisition and conservative restoration of buildings to be used as residences, social, cultural and artisan activities; repair of bridges and canals (tranche 1a) – total cost, EUR 45 million.*

This is a commitment to "put in place the initiatives necessary for refinancing under the national Special Law for Venice". The 2017 Report (pp. 15-16) states: "costs of maintenance and utilities are higher than any other and amount to EUR 41 million per year" and that the funds once accorded by the Special Law have in recent years instead gone to the Mose project. In this way, close to 1.25 billion Euros over 10 years have not been available.

In the Annex 1_Racc. 3, the total amount indicated for these actions totals to under 4.5 million Euros, allocated in 2017. Although these are defined as "non-routine interventions", these seem to include maintenance works to support transport (including water transport in Venice) as well as school buildings, sewer systems, cemeteries, theatres and more.

The dredging of the canals is vital for hygiene in Venice as well as economic health: "the average sedimentation of canals in Venice is on the order of 2 centimetres per year", which means that a quantity of "at least 10,000 cubic metres of mud" must be dredged each year²². These sediments are principally of human origin, coming from sewers, as well as runoff from the streets and the erosion of canal walls due to the *moto ondoso* (the incessant force of motorboat wakes), together with rubbish that falls into or is intentionally thrown into the water.

It is evident that in a city where emergency services and goods travel via water, dredging to maintain canal depths is vital: the photos attached (Fig. 2) showing the build-up of sediment in canals are from this past winter (when low tide levels reached 50 centimetres below the standard for the mean level).

As was mentioned, the sediment deposited in the canals comes in large part from the sewers: Venice lacks an integrated sewer network as well as wastewater treatment – the European Commission has brought Venice (along with 700 other urban agglomerations in Italy) to the European Court of Justice for the violation of EU requirements for sewers and wastewater treatment²³. For several decades, Venice has started to require the installation of septic tanks in every building restoration project, but there have been derogations²⁴. Modern areas, such as the Lido of Venice, where there are no major obstacles to the construction of

²² www.insula.it/index.php/comunicati-stampa, 2019 mar. 20.

²³ live.comune.venezia.it

²⁴ R. DE ROSSI, *Rifiuti, bollette contestate esposto alla Corte dei Conti*, «La nuova Venezia», 2019 feb. 24.

sewer networks, incredibly still partially lack them. Other source of pollution of the sediment in the canals comes from the combustion of hydrocarbons by marine motors, from rubbish. Automobile tyres used by boats as bumpers when they dock, despite being classified as special waste, are also found in the canals, are also found in the canals²⁵. This winter, during a voluntary campaign to clean the canals led by gondoliers, a large quantity of tyres were collected (Fig. 3)²⁶.

The sampling of sediment deposited in the canals²⁷ carried out by Insula (city-owned company created to maintain the canals and streets) is in fact extremely alarming (Fig. 4). Since 1993, the *Protocollo fanghi*²⁸ classifies Venetian sediment into four categories according to their level of hazard. Of the 82,866 cubic metres of sediments to be dredged, 61,731 cubic metres are of type C and 21,155 are of type D (i.e. “beyond C”), meaning that there are toxic-hazardous and should be discarded in landfills outside of the Lagoon, according to the rule. Instead, they are found under our homes. We believe that Venetians are not aware of the level of pollution in their city’s waters.

The dredging of Venice’s canals, suspended during World War II, was only restarted in the 1990s after decades of citizen protests, thanks to the financing provided by the national Special Law for Venice of 1992. This work should have been carried out over 25 years – however, almost all of the funds of the Special Law have been diverted to the Mose project, reducing this fundamental maintenance activity to the point of halting it. Only recently has the City Government restarted dredging, providing 1 million Euros in 2016 and a further 3.5 million in 2019 for work on 28 canals. In the 1990s, dredging was carried out by closing off canals and pumping out the water: doing allowed an assessment of the damage to the embankments (which are the foundations of Venice’s buildings) caused by motorboat wakes and their repair. The City Government has now chosen instead to dredge the canals without closing them off, meaning that this vital repair work is not being carried out²⁹. Moreover, this approach to dredging can disperse pollutants in the sediment.

- *Pact*, p. 11: «Opere di completamento rete marginamento delle macroisole del SIN di porto Marghera», [Completion works for the margin network of the SIN Marghera macro-areas] total cost 250 million. The project was in large part already financed: a good 178 million came from the *Accordo di programma per la chimica di Porto Marghera* [The Porto Marghera Chemical Industry Programme Agreement] dating back to October 1998 and a subsequent agreement of 2012. The 2017 Report (p. 12) describes the operation as «a huge challenge for environmental reclamation», and a «remedial work» (2017 Report, p. 28). To us, it seems the conclusion of a work of marginalization of the shores of the industrial site of Marghera, to prevent harmful toxic wastewater from continuing to percolate and to pollute the Lagoon.

In *All. 1_Racc.3* such an important intervention is cited, without mentioning the sum.

- *Pact*, p. 11: *Completion of the wastewater treatment plant – Integrated Fusina Project*, with a total cost of 13 million Euros.

This plant will treat urban wastewater and rainwater runoff from Mestre, Marghera and the Mira area as well as industrial wastewater from Porto Marghera and the polluted groundwater under the industrial area, as well as runoff from potentially polluted sites. The plan is vital for addressing water pollution but its siting was a mistake: it is built on an artificial island – called *Cassa di colmata A* – that once was a salt marsh. In the 19602, the

²⁵ According to DGLS 152/2006, Art. 184, paragraph 3.

²⁶ «www.veneziaradiotv.it»; *Cnr: laguna di Venezia scarica di ruote di camion e barchini*, «tv.iltempo.it»

²⁷ Report, *All. 2_Racc. 3. Relazione Scavo rii e ripristino fondamenta*, tabella a p. 10, *Classificazione dei sedimenti*.

²⁸ Sludge must be disposed of according to the *Protocollo per lo smaltimento dei fanghi* (Criteri di sicurezza ambientale per gli interventi di escavazione trasporto e reimpianto dei fanghi estratti dai canali di Venezia, art. 4, comma 6, Legge 360/91). This Agreement was drawn up in 1993 by the Ministry of Environment, Magistrato alle Acque, Regione Veneto, Provincia di Venezia, Municipality of Venezia and Chioggia (www.arpa.veneto.it).

²⁹ <https://live.comune.venezia.it/it/2019/02/scavo-dei-rii-da-luned-iniziano-i-lavori-rio-de-san-daniele-castello-zaccariotto-dopo>

area was filled in, and part of the natural Lagoon was destroyed, with the goal of enlargening the industrial zone, which happily did not take place. It should have been restored as a natural area by reopening its channels – this did not happen.

The *2018 Report (All. 1 Racc. 3)* notes a smaller amount than the *Pact*, 11.4 million Euros, of which only 1.14 million have been confirmed.

- *Pact*, p. 11: *Burial of the Terna high-tension electrical lines, foreseen by the AdP Vallone Moranžani?*. This project comes from a 2006 Programmatic Accord – and thus its 90 million Euros were already allocated before the *Pact*. Under this Accord, toxic sediment coming from the dredging of the Malamocco-Marghera Channel and other industrial channels would be stored on the inner shore of the Lagoon, at Moranžani (the deep shipping channels continue to fill in with sediment as they are not a natural feature of the Lagoon). The sediment would have been amassed in small hills, 16 metres high, which would have stood out in the horizontal panorama of the Lagoon of Venice and its inner shores (Fig. 5). The *2017 Report* claims that this is a “work of highest environmental value”. We contend that it is a landfill that is peddled as an urban park. Italia Nostra opposed the project. The local population accepted it with reluctance, as they were promised that together with the landfill, the high-tension electrical lines running past their community would be buried underground (an action that should have been done without bargaining). Nonetheless, the burial of the electrical lines remains to be implemented.

In December 2014, the European Court of Justice condemned Italy³⁰ for this and other landfills that did not respect EU norms, setting an initially penalty of 40 million Euros and a further penalty of 42.8 million Euros twice a year as long as the landfills did meet EU norms.

Nell’*All. 1_Racc. 3* the project is quoted.

- *Pact*, p. 11: *Restoration of the Marghera Fort (1st tranche)*, total cost of 12 million Euros. This sum is to be provided in its entirety by the national Ministry of Cultural Heritage. In the *Annex1_Racc. 3* to the *Report*, the sum allocated up to today is reported as only 500,000 Euros.
- *Pact*, p. 11: *Functional restoration of the Doge’s Palace (1st tranche)*”, total cost of 8 million Euros. This project would restore the outer surfaces of the Palace and improve its fire prevention system. We are taken aback by the assertion in the *Pact* (p. 7, point 4b) that the walls of the Palace need restoration “as they are affected by a de-cohesion due to the characteristics of the material used in construction, the climate of the Lagoon and the exposure to atmospheric agents in general”. More to the point, the grave air pollution in Venice degrades the materials of its monuments – a topic that the *Pact* does not mention. In the *Annex 1 Racc. 3* to the *Report*, however, the total amount has been reduced to 5.5 million Euros, of which just over 5 million have been provided (another 250,000 Euros have been disbursed for work on the Correr and other museums in Venice).
- *Pact*, p. 11: *Experimental tourism management systems in Venice (1st tranche)*, total cost of 10 million Euros. In the *Annex to the 2018 Report (All. 1, Racc. 3)*, the amount provided is only 682,000 Euros, of which 265,00 went for the “experimentation with different landing points for non-scheduled boats (so-called *Gran Turismo*)”. In other words, the Italian state spent 265,000 Euros to move the landing points for private tourism boats that are extremely damaging for the city and the Lagoon – they produce large boat wakes (which erode the city’s foundations and the natural features of the Lagoon) and bring to Venice rivers of tourists. The experiment is presumed to have failed as it has been cancelled³¹. Other actions foreseen are for minor and largely ineffective measures. All this shows that the measures adopted are not effective to contain tourism (for this, see pp. 30-39 below).

³⁰ <http://curia.europa.eu/juris/document/document.jsf?text&docid=160245&doclang=IT>

³¹ *Brugnaro sul turismo fa come i gamberi*, «nuovavenezia.gelocal.it», 2019 apr. 25.

- *Pact*, p. 11: *Research on conservation and restoration technologies*, total cost of 3 million Euros for the Ca'Foscari and IUAV universities.
The Annex 1, *Racc. 3* to the *2018 Report* shows that the amount disbursed has only been 300,000 Euros.
- *Restoration of public buildings and places of socio-economic important and actions against illegality on the mainland*, total cost 21 million Euros.
Here too there are failures: in the last two years, Mestre has become Italy's capital of drug overdose³² and Venice, once a safe city even at night, has seen cases of violence such as the phenomenon of underage gangs (called "baby gangs" in Italy) that terrorise both Venice and Mestre³³, as well as attacks on migrants, such as the Bengali community³⁴.
The Annex 1_ *Racc. 3* to the *2018 Report* (*All. 1, Racc. 3*) shows the amount disbursed. These have been for the most part actions for the maintenance of cemeteries, schools and sports facilities as well as actions in underprivileged neighbourhoods.
- The Annex 1, *Racc. 3* to the *2018 Report* (*All. 1, Racc. 3*) lists in its last line "Technical assistance to support the implementation of the City of Venice Development Pact", a total of 200,000 Euros of which only 20,000 have been disbursed.
- In addition, the *Pact* states that the national government would enlarge the Customs Free Zone of the port and on the island of Murano – which would be recognised as an industrial area in crisis. Nonetheless, in March 2017 the City Government authorised the conversion of two historical glass factories on Murano into hotels.
In sum, the *Pact* promised 457 million Euros – however, the great majority of this money, 340 million Euros, comes from three previous Programmatic Accords dating back to 2012, 2006 and 1998. The national government promised about 110 million Euros of new funding.

- **«Works of the Steering Committee»**

(*Report*, p. 14): «The frequency of the meetings and the substantial participation of the entities to the Steering Committee, meetings, held both for institutional representatives and technical experts, prove the commitment to address the main questions related to the property's management and the willingness to contribute to the implementation of the requests by the World Heritage Committee, in order to guarantee the conservation and the sustainable development of the property and its Outstanding Universal Value for future generations».

This implies that the Steering Committee has worked in harmony and that, in accordance to the World Heritage Committee's Recommendation, **«all the institutions involved, having recognized the major risks to the property, are working collaboratively»**, This is not the case. For example:

- Steering Committee: The Mayor of Chioggia declared to the press that «there was only one meeting of the [steering] committee at which the municipalities of the inner shore [of the Lagoon] participated on 2017 March 14», and he accused the Mayor of Venice of not having involved Chioggia in the preparation of the *2018 Report* to UNESCO: «the dossier was made by Venice without consulting the other municipalities»³⁵.
In the two years of delay granted by UNESCO, there have been two meetings of the Steering Committee:
 - 14 March 2017, when the *2017 Report*, presented on 1 February 2017, was ratified;
 - 16 November 2017, when the Mayor of Venice simply presented what had been "decided" in the *Comitatone* (the national inter-ministerial committee charged with Safeguarding the Venice Lagoon) on the plan to move large cruise ships to Marghera, inside the Lagoon – however, this was not a decision but only an invitation to develop the proposal. In this

³² I freddi numeri di un'emergenza in corso: "La droga mestrina finora ha ucciso 14 persone", «veneziatoday», 2018 apr. 20.

³³ Baby gang, la stretta delle forze dell'ordine, «nuovavenezia.gelocal.it», 2019 apr. 24.

³⁴ M. ARTICO, La denuncia: provocati e picchiati da bande di ragazzini solo perché siamo bengalesi, «nuovavenezia.gelocal.it», 2019 mar. 2.

³⁵ A. ZO., Dossier Unesco, faida nei 5 stelle "Noi siamo stati delegittimati", Corriere del Veneto, 2018 dic. 19

meeting, the Steering Committee also agreed to enlarge the Buffer Zone, increasing the number of municipalities from the nine on the shores of the Lagoon to 132, and the number of provinces from two, Venice and Padua, to include those of Vicenza, Treviso and Rovigo. A perimeter this large obviously renders the Buffer Zone ineffective.

There were also four meetings at technical level:

- 12 October 2017 on the Buffer Zone

- 9 November 2018

- 27 June 2018 on tourism and the Buffer Zone

- 25 July 2018 on the Buffer Zone and on advertising on the *vaporetti*, Venice's transit ferries

In this situation, and with the deadline for the delivery of Italy's Report to UNESCO, on 2 December 2018 the Mayor of Chioggia decided to send a letter to the Mayor of Venice with a set of specific requests, which unfortunately have not been fulfilled: «We would ask that the report to UNESCO reiterates the need to prevent large ships from entering the Lagoon, limiting passage to those up to 50,000 tonnes and that opposition to the construction of a new LPG deposit in Chioggia, which would put the environment at risk, be confirmed»³⁶ (for further information on the proposed LPG project, 300 metres from schools and the centre of the city of Chioggia on its lack of proper authorisations, please see p. 59 below).

In conclusion, the most important political fact is that the 2018 Report on the state of conservation presented in December 2018 was not approved by the Steering Committee in any of its meetings, but is the work only of Mayor Brugnaro of Venice.

Not only was the Steering Committee not convened regularly, but also the *2018 Report* by the City of Venice was not discussed or even presented in the Municipal Council. Even after its delivery to UNESCO, City Councillors did not receive a copy of it. Italia Nostra had to make a formal access to information request to obtain the *Report*.

– Relationships between the institutions involved in the protection of the site

Problems are not only seen with the Steering Committee. On 31 January 2019, the Regional Commission for the Cultural Heritage of Veneto made a declaration that the Grand Canal, St. Mark's Basin and the St. Mark's and Giudecca Canals are of cultural interest (as per Art. 10 of national Legislative Decree 42/2004). For the first time in Italy, urban waterways were recognised as being of historical and artistic interest. Italia Nostra is pleased with this recognition and notes that the Venice Chapter underlined the need to do so in a letter of October 2013 to the national Minister of Cultural Heritage and Activities at that time, Massimo Bray. Italia Nostra and other associations hope that this protection can be extended to the whole complex of canals and channels of the Lagoon, also to overcome the fragmentation of institutional competences that exist today.

And to ensure a better definition of the canals protected by the Regional Commission, our associations have presented an appeal that under the current declaration, asking to extend the route of the Giudecca Canal to the west, which in the legal bond does not reach the Venice Maritime Station, contrary to what is shown in the cartography (Fig. 6).

The Government of the City of Venice has instead declared its intention to appeal against this protection in the Regional Administrative Court, as it “holds that the provisions represent a heavy, useless and ineffective invasion of the competences... given to the City”³⁷. The Port Authority (in full, the Authority of the Northern Adriatic Sea Port System) has given its lawyers a mandate to oppose this recognition³⁸. The City and the Port are thus, for different motives, opposed to a protection measure that would make it more difficult

³⁶ E. TANTUCCI, *Unesco, Chioggia contro Venezia: “Brugnaro condivide il dossier”*, La nuova Venezia, 2018 dic. 2.

³⁷ G. PIETROBELLI, *Venezia, Mibac “blocca” le Grandi Navi. Comune ricorre al Tar: “Inutile invasione nelle competenze delle autorità cittadine”*, *ilfattoquotidiano.it*, 2019 mar. 30.

³⁸ G. PIETROBELLI, *Venezia, Mibac “blocca” le Grandi Navi. Comune ricorre al Tar: “Inutile invasione nelle competenze delle autorità cittadine”*, *ilfattoquotidiano.it*, 2019 mar. 30.

- In our opinion, the statement «**all the institutions involved, having recognized the major risks to the property ...**» (Decision 41 Com.7b.48, Recommendation no. 3) is not true. The City Government does not recognise the dramatic situation of the site. Proof can be seen in the initial statements of the *Report*:
 - (p. 6): «a city able to react to decline and to be relaunched by giving value to metropolitan excellences and by attracting national and international investments to create jobs». The new jobs are many but unqualified, mostly related to exponentially growing tourism, and young people who have completed the study cycle are forced to leave the city;
 - (p. 6): «it is important to debunk the notion that the ancient city is just a hotel. The City Council blocked the new accommodation facilities for the next three years, but unfortunately it has no authority over tourist rentals». The so-called block on hotels is however subject to many exceptions – according to the estimates made by a City Councillor from the opposition, “the block is in place for perhaps 15% of the city’s territory”³⁹. It is true that the City “has no authority over tourist rentals”, but the law that liberalised these rentals was put in place by the Veneto Region in 2013⁴⁰ – and the City Government at the time did not oppose it.
 - The Mayor of Venice, when asked about photos of the city suffocated by tourists during the Carnival, commented “if you don’t want confusion, go and live in the countryside and not at Rialto”⁴¹, and “we are trying to relaunch the city this way”⁴² (Fig. 7). His City Councillors declared, “tourism is growing, the number of tourist beds must increase”⁴³.
- It appears that also the national government is not aware of the grave risks that the Lagoon faces. This natural area is undergoing severe erosion – as shown by dozens of scientific studies – but the national government promotes project plans for the port that would only increase erosion (see pp. 50-60 below).
- Both the seaport and the airport are growing rapidly, and this is not compatible with the preservation of the site (see p. 28 below), as the 2015 Reactive Monitoring Mission understood.
- The State Property Agenzia (*Demanio*) is selling palaces and islands in the Lagoon to raise money – and these will surely be converted into hotels (see p. 41 below).

Based on these elements, **it is not possible to agree** with Decision 41 COM.7B.48, Recommendation no. 3 «... **the State Party and all the institutions involved, having recognized the major risks to the property, are working collaboratively**», which the *2018 Report* tries to prove.

- **«Interventions for the protection of monuments, landscapes and archives».**

This point (*Report*, pp. 15-18) is about the regular activities that the *Soprintendenze* for Venice – the local offices of the Ministry of Cultural Heritage and Activities – has undertaken throughout the postwar period, together with a few ministerial projects. Under this point, the *2018 Report* also cites (p. 17) the important restoration and recovery project promoted by the Municipality of Chioggia for: «the San Felice Fort in Chioggia, testimony of the defensive system of the Venice lagoon built at the time of the Republic of Venice, which has an invaluable landscape, historical value, environmental and architectural». The restoration was carried out “with the compensation funds of the Mo.S.E.”, required by the European Union to compensate in part for the grave environmental damage caused by this project in the Lagoon.

- **Other activities of strategic relevance for the conservation of the property**

The *2018 Report* (pp. 19-20) refers to two other actions: a proposal for a resolution of the Regional Government for the «Allocation of resources financed from the funding of the Special Law for

³⁹ G. PRADOLIN, *Cambi d'uso, la maggioranza alza il muro*, «Il Gazzettino», 2017 giu. 17.

⁴⁰ Si tratta della legge regionale n. 11 del 14 giugno 2013, *Sviluppo e sostenibilità del territorio*.

⁴¹ E. TANTUCCI, *Caos di Carnevale, Brugnaro: “Andatevene in campagna”*, «La nuova Venezia», 2018 gen. 29.

⁴² M. PI., *L'assalto dei 50 mila. Ressa a Cannaregio per la festa sull'acqua*, «La nuova Venezia», 2017 feb. 12.

⁴³ F. FENZO, *Stazione, sì all'accordo e colpi bassi*, «Il Gazzettino», 2019 mar. 15.

Venice with regional jurisdiction derived from verified savings in expenditures»: 15 million euro from savings of the Special Law for Venice to be allocated not to Venice, but to a large area «that contains more than 108 municipalities»! This concerns 15 million Euros in savings – however, they are not destined specifically for Venice but for a vast area “that contains more than 108 municipalities”! The second action is the “restoration of SIC IT 3250003 and SIC IT 3250023, situated in the territory of the Municipality of Venice and the Town of Cavallino Treporti”: this restoration measures would address damages caused by the Mose.

In conclusion, based on the information we have provided above, we contend that Decision 41 COM.7B.48, Recommendation no. 3 has not been fully observed: the State Party and all institutions have not demonstrated a full recognition of the risks to the property and they are not all working collaboratively.

DECISION 41 COM.7B.48, RECOMMENDATION NO. 4

«Notes that progress has been made towards the implementation of some of the 2015 Reactive Monitoring mission recommendations endorsed by the Committee and reiterates its request that the State Party continue to implement all the recommendations put forward in the Decision 40 COM 7B.52, including immediate, short, medium and long-term measures»

We list here the eight recommendations of **Decision 40 COM 7B.52**:

- **DECISION 40 COM 7B.52, RECOMMENDATION NO. 3:**

«Expresses its extreme concern that the combination of previous developments, ongoing transformations and proposed projects within the property which are threatening serious deterioration of the eco and cultural systems of the Lagoon and irreversible changes to the overall relationship between the City and its Lagoon, as well as the loss of architectural and town-planning coherence of the historic city, all of which would lead to substantive and irreversible loss of authenticity and integrity»

Every day, new economic development projects appear on the horizon. Many could bring a “serious deterioration of the eco and cultural systems of the Lagoon”. Some are under constructions, others approved and others still in preparation and others only under discussion. A few appear to have been shelved but could easily be revived. And many of these projects have appeared after the 2015 Reactive Monitoring mission (for some of these projects see p. 59-69 below)

- **DECISION 40 COM 7B.52, RECOMMENDATION NO. 4:**

«Considers that the property requires an immediate improvement to the planning tools available through the creation of:

1. an integrated strategy for all on-going and planned developments within the property,
2. a three-dimensional morphological model and
3. a sustainable tourism strategy, all of which should be reflected in an updated Management Plan for the property; this revised planning approach should also be founded on a shared vision of authorities and stakeholders which affords priority to sustaining the Outstanding Universal Value (OUV) of the property and its landscape and seascape setting»

The information presented above concerning Decision 40 COM 7B.52, Recommendation no. 3, shows that «**an integrated strategy for all on-going and planned developments**» does not exist.

Nor «**A three-dimensional morphological model**» has not been prepared. In fact, the project for an *Update of the Morphological Plan of the Lagoon (Aggiornamento del Piano per il recupero Morfologico e Ambientale della Laguna di Venezia)*, presented in December 2017 by the Consorzio Venezia Nuova (New Venice Consortium, the consortium which is building the Mose gates) and the CORILA (Consortium for coordination of research activities concerning the Venice Lagoon system), was rejected by the Ministry of Environment – in part following to the detailed Observations presented by Italia Nostra to the Ministry. The project is now being revised. Incredibly, the task has been given again to CORILA, which received a further 10 million Euros in financing (see pp. 69-71 below)

Nor has an effective «**sustainable tourism strategy**» been prepared (see pp. 30-38 below), and there is no indication of a «**revised planning approach... founded on a shared vision of authorities and stakeholders**» (see p. 11-13 above).

- **DECISION 40 COM 7B.52, RECOMMENDATION NO. 5:**

«Reiterates its request to the State Party to enforce speed limits and regulate the number and type of boats in the Lagoon and in the canals»

Nothing has been done in this regard. The Lagoon and above all the Grand Canal remain at great risk (see pp. 34-35 below).

- **DECISION 40 COM 7B.52, RECOMMENDATION NO. 6:**

«Also reiterates its request to the State Party to adopt, as a matter of urgency, a legal document introducing prohibition of the largest ships and tankers to enter the Lagoon and requests the State Party to put in place all necessary strategic, planning and management frameworks to this end»

No «legal document introducing prohibition of the largest ships and tankers to enter the Lagoon» has been produced. This despite the fact that the 2015 *Mission Report*, which studied *in situ* the risks that the Lagoon faces, calls for the «**adoption of a legal document introducing prohibition of the largest ships and tankers to enter the Lagoon**».

On the contrary, the Marghera project (see pp. 53-55 below) wishes to bring into the heart of the Lagoon ever larger ships. But if the “Marghera option” is a project, the construction, 300 metres from the city centre of Chioggia, in Val da Rio, of an LPG and diesel fuel storage system with a total capacity of 10,350 cubic metres, is nearing completion (see p. 59 below). The refuelling of this plant will take place by sea via gas transport vessels which, passing through the port of Chioggia, will enter the Venice Lagoon, unload the fuel in the depot and pass through the Lagoon again to reach the Adriatic in "empty" mode.

This cycle will take place several times a month.

The gas, therefore, will be loaded on tankers to reach the entire Po Valley via road freight.

Not only, therefore, does it not work to "avoid the transport of petroleum and by-products to the Lagoon", as indicated in Art. 3 of the Law no. 798/1984 (*Nuovi interventi per la salvaguardia di Venezia, New interventions for the safeguarding of Venice*), but even this transport is increased through the entry into the Lagoon of oil derivatives far more dangerous than the oil itself.

- **DECISION 40 COM 7B.52, RECOMMENDATION NO. 7:**

«Also requests the State Party to halt all new projects within the property, prior to the mid-term assessment of the Management Plan, and the submission of details of proposed developments, together with Heritage Impact Assessments (HIAs) and Strategic Environmental Assessment (SEA), to the World Heritage Centre, in conformity with Paragraph 172 of the Operational Guidelines, for review by the Advisory Bodies».

No project has been blocked. Indeed, in December 2018 the Safeguard Commission approved a project for an embankment of the Canale Malamocco-Marghera, as we have noted above (see p. 60 below). This embankment, among its impacts, would divide the Lagoon in two – despite the fact that the Special Law of Venice insists on the morphological unity of the Lagoon. Italia Nostra has opposed this invasive project, presenting an appeal to the Tribunale Amministrativo Regionale (TAR, Regional Administrative Court) on 30 March 2019.

No «**Heritage Impact Assessments (HIAs)** have been produced, nor a **Strategic Environmental Assessment (SEA)**» (on this topic, see pp. 59-71 below).

- **DECISION 40 COM 7B.52, RECOMMENDATION NO. 8:**

«Endorses the recommendations of the 2015 mission and further requests the State Party to fully implement these recommendations».

This Recommendation underlines that the recommendations of the 2015 Reactive Monitoring Mission should be respected. In its *2018 Report*, the City of Venice refers to its responses to Recommendations nos. 3 to 9 of Decision 40 COM 7B.48 – none of which provide an adequate answer, as we have shown.

We would like to repeat the two key recommendations of the 2015 Reactive Monitoring Mission:

2015 REACTIVE MONITORING MISSION RECOMMENDATIONS:

- **A vision for Venice shared among all stakeholders concerned at national, regional and local levels and common strategy should be developed towards protection of all components of the property.**

The tasks and competences of the established Steering Committee should be clearly defined so that the Committee can survey compliance with provisions of the Operational Guidelines for the Implementation of the World Heritage Convention and the enforcement of regulatory and protection measures.

The Mission's focus on stakeholders, as we have seen, is also seen in Decision 40 COM 7B.52, Recommendation no. 4, concerning a sustainable tourism strategy: «**this revised planning approach should also be founded on a shared vision of authorities and stakeholders**».

It was not easy for Italia Nostra, one of the longest standing stakeholders for the protection of Venice and its Lagoon, or for other actors in Venice, to find a space in the visit of the three Commissioners, as per Decision 38 COM 7B.27. We only received an invitation to meet them the evening before, following our requests via UNESCO in Paris. Our delegation was introduced to the Commissioners by two officials of the Ministry of Cultural Heritage with the words that the hearing would not last «more than five minutes» as the Commissioners were «tired». Our discussion was hurried by the continuous requests of these officials to finish up.

The relations between City Government and the associations for the protection of Venice and its Lagoon – as those for many citizen groups – have not improved: our association had to make a formal freedom of information requests to receive copies of first the *2017 Report* and then the *2018 Report*.

On the topic of a vision for Venice and a common strategy, the City refers to its responses to Recommendations nos. 3 and 10 of Decision 41 COM.7B.48: on our opinion these responses are not adequate. We have referred to the work of the Steering Committee (see p. 11 above) and the fact that the Mayor of Chioggia was not involved in the preparation of the *2018 Report*. The City of Chioggia in fact did not see a copy of the *2018 Report* – nor did City Councillors in Venice.

- **Management Plan. A mid-term review of the Management Plan of the property should be conducted ...**

To our knowledge the Management Plan has expired in 2018.

- **A risk management strategy should be developed ...**
- **A sustainable tourism strategy should be developed ...**

Nor an appropriate risk management strategy neither an effective sustainable tourism strategy has been prepared.

- **Boundary issues. In conformity with the Committee decision, the State Party should undertake the revision of its preliminary proposal in line with the ICOMOS technical review and submit to the World Heritage Centre the minor boundary modification by 1 February 2017**

This issue, which implies a different vision between the State party and the Municipal administration, has not been fully resolved.

- **Planned developments: regulations and cumulative impact assessment.**

The Mission considers that it is crucial to develop a virtual three-dimensional geomorphological plan of the territory derived from assembly of the substantial scientific and technical available data sets and to use this combined information in an integrated manner. The plan should include all aspects of the lagoon, nature, infrastructure, urbanism, architecture, sociocultural aspects. It should be conceived as a dynamic instrument, which should allow modelling of new projects in order to simulate their overall cumulative impacts in the future.

As indicated above, this has not been prepared. The many mathematical models built by universities and scientific institutes prove beyond a shadow of a doubt that Malamocco-

Marghera Channel and other artificial channels have changed the hydrological dynamics of Central Lagoon and this, along with ship traffic and wind factors, has led to the process of erosion.

- **Within the framework of existing procedures and plans, a Master Plan should be developed to define a set of regulations for all on-going and planned developments within the boundaries of the World Heritage property and its future buffer zone. It should be adopted as a matter of urgency for the recovery and preservation of the Outstanding Universal Value of the property and its associated landscape and seascape values. The Master Plan should be revised periodically.**

A Master Plan for the recovery and preservation of the Outstanding Universal Value of the property and its associated landscape and seascape values has not been prepared.

- **The system of artificial flood gates (MoSE) and its related Lagoon monitoring system that soon will be in function ... The functioning of the system should be used as a large-scale experiment»**

The *Mission Report* was prepared in 2015. The date that the Mose will start working has been regularly put off – and now in fact no date has been set.

- **Within an integrated long-term territorial planning process, it is important to remove large harbour facilities for large ships (of the 20/21 century), incompatible with the natural and cultural values of the WH property, outside of its boundaries**

The previous national government as well as the current Mayor and the Port Authority instead all wished to bring cruise ships from the current Maritime Station to Marghera, on the inner shore of the Lagoon, thus making them cross the whole Lagoon. But nothing was decided.

The current national government is now examining a project to bring the ships to the port of the city of Chioggia, therefore also within the Lagoon.

- **«The Mission strongly supports the principle that a multi modal terminal for oil tankers and container transport vessels be established outside of the Lagoon and not necessitating navigation of such ships inside the Lagoon».**

The multi-modal terminal – planned under the former President of the Port Authority – has been rejected as too costly. But it is still possible to use a simple buoy system to dock large container ships, a buoy formed by floating (see the transshipment terminal container on the North see) or sinkable modules (off-shore LNG terminal on the Delta of the river Po).

- **The Mission strongly supports the need and efforts for further work to clean contaminated groundwater and soil. The Port Authority is encouraged to continue and terminate this programme.**

The reclamation has not been completed and much has yet to be done.

- **The Mission is convinced that, as part of an overall SEIA comparing different options for tourist terminal facilities, the feasibility for a tourist port at the Lido di Venezia, including its connection with the city and the hinterland (access by road and rail), which is at a conceptual stage only, should also be analysed.**

There are two projects, but both present problems, albeit of different magnitude. Neither the municipality Government nor the State Party had considered them

- **The Mission clearly supports the strategic aim adopted by the local authorities, to prevent large ships (including cruise liners) from using the San Marco basin and Giudecca Canal. A new location for passenger terminal facilities needs to be found outside of the Lagoon. The location should avoid large cruise ships to move inside the Lagoon.**

As noted above, no progress has been made. In fact, as noted, there is a plan to move the cruise ship docks to Marghera, meaning that the cruise ships would travel along the Canale Malamocco-Marghera and cross all the Central Lagoon, and there is another plan to move the cruise ships to Chioggia, meaning that they would cross all the Southern Lagoon.

- **The Mission is convinced that the existing airport facilities have reached carrying capacity as well as the limit of compatibility with the maintenance of the heritage values of the Lagoon, notably in the surroundings of the airport and its connection with the City of Venice. Substantial expansions of the current international airport facilities need therefore to be planned for another location outside of the WH property and its future buffer zone**

The *2018 Report* by the City of Venice 2018, on p. 24 (Table II “2015 Reactive Monitoring mission – Recommendations”), states: «See the response to the recommendation n. 8 of Decision 40.COM.7B.52». But if we check the cross-reference (*2018 Report*, p. 22), we find: «See Table II “2015 Reactive Monitoring mission – Recommendations”». The two responses only refer to each other!

The *2018 Report* does not address the crucial problem of the airport’s unsustainable growth: it only refers to tickets to the airport (p. 53), transport operators and carriers (p. 70) of partnerships (p. 71) and of a discussion in the Steering Committee on plans for the Venice Marco Polo Airport (p. 88).

The Veneto Region’s *Destination Management Plan Venezia 2016-2018*⁴⁴ (*Dmp*) defines strategic directions for tourism across the whole region. Among its objectives is: «valuing and development of the Marco Polo Airport... promoting new international routes» (on the development of the airport).

- **Big Cruise-ships in the Lagoon. Strategic environmental planning for the relocation of the Marittima passenger transport terminal, as well as the Marghera large ship harbour facilities outside of the Lagoon should be undertaken. A priority aim would be to consider an alternative location for the passenger terminal location that would not require crossing of the Giudecca Canal and San Marco basin or other passage of large cruise ships across the Lagoon.**

The 2015 Reactive Monitoring Mission did not close its eyes in front of the problem of Marghera’s harbour for large commercial ships. However, from 2018 – due to new dredging works – container ships of up to 8500 TEU can now enter the Lagoon⁴⁵.

- **Digging New Channels for Big Cruise-ships**

Thorough and integrated water and sediment flow models should be established to forecast possible water flow and sedimentation changes as consequences of the digging new deepwater waterways. Based on such integrated modelling studies, more detailed assessments should be undertaken to calculate the consequences of the digging of new deepwater waterways on the Lagoon hydrology, sedimentation and erosion, its biodiversity and species communities, including commercially exploited fish and shellfish. Only if such studies exclude any negative effect on the Lagoon ecosystem, digging of new deepwater waterways could be considered.

Repeated scientific studies have shown the damages created by the dredging of ship channels in the Lagoon.

- **Speed Limits in Canals. The mission encourages the authorities to install the automatic speed monitoring system in all relevant canals and to enforce speed limits through fining of any transgressors (incl. taxis).**

The Argos system for automatic speed monitoring was not calibrated and the fines that were given have been cancelled. Only GPS requirements could address the problem of speeding throughout the Lagoon, but the current Mayor and the transport and taxi interests oppose this solution. It can be noted that the Mission Report underlines «(incl. Taxis)»: in a week of stay at the site the Mission understood the problem perfectly.

- **Lack of Maintenance of Buildings. The mission noted the lack of effective maintenance works on buildings of medium and minor architectural value and**

⁴⁴ www.regione.veneto.it/web/turismo/dmp

⁴⁵ G. FAVARATO, *Escavo finito, via libera alla grande nave*, «nuovavenaziageolocal.it», 2018 giu. 18.

recommends ... appropriate measures, including those in conformity with the Special Law for Venice, in order to prevent deterioration of architectural and urban planning coherence.

Support under the Special Laws for Venice was once disbursed to help private owners restore less renowned residential buildings in the city. In recent years, all these funds have gone to the Mose. For Venice itself, nearly «1.250 millions» Euros have been lost over the past ten years, according to the *2017 Report* (pp. 15-16).

– **Tourism Pressure**

The Mission recommends that urgent measures to manage tourism ... The main objectives are:

- **To install tools for precise and differentiated statistics on tourism**
- **To develop a comprehensive sustainable tourism strategy, and**
- **To implement efficient measures to decrease the number of tourists, especially the one-day-tourists, to a level in accordance with the City's capacity.**

Almost none of this has been done except for a few contradictory and ineffective actions

– **Change of Use of Buildings**

The Mission recommends to install efficient legal measures to discourage the purchase of flats for second residences and to change of use from ordinary habitation into any form of hotel industry (hotels, B&B, etc.) and to encourage the reconversion of B&B facilities into rented flats.

No «**legal measures to discourage the purchase of flats for second residences**» have been taken. Meanwhile, islands that were once immune from this, such as the Lido of Venice, are now under assault from wealthy foreigners buying apartments and even entire villas for prices that Venetians cannot match.

Nor are there any «**legal measures... to encourage the reconversion of B&B facilities into rented flats**». It can be noted that the City is considering a rule to require all tourist facilities to have septic tanks: «30 to 40% do not have this feature... And it would be impossible to meet such a requirement due to the high costs and the opposition of co-owners to the works. More than one in three dwellings could thus be reconverted, returning to be available to those who wish to rent a home in Venice... This would be fundamental as finding a home today in Venice has become impossible»⁴⁶. We hope that this important rule will be adopted.

– **Crowding-out Inhabitants**

Based on the principles of the 2011 UNESCO Recommendation on the Historic Urban Landscape a plan for stabilising and increasing the number of inhabitants should be prepared, including measures for bettering the conditions of life for inhabitants

There is no plan, and conditions for inhabitants are becoming ever more difficult.

– **Loss of Traditional Craftsmanship**

Local craftsmen and traditional manufacturing should be encouraged and supported by facilitate adequate and affordable atelier-spaces and by ensuring a clear declaration of provenance.

According to a report⁴⁷ by the Artisan association (Confartigianato Imprese Venezia) the number of artisans in Venice has halved: «With the expulsion of its artisans, Venice has signed its own condemnation». The leader of the study states: «The hemorrhage of enterprises is seen in terms of quantity by above all in terms of quality... young people, the middle class and all those who do not live directly or indirectly from tourism are going. The same fate is seen for artisans... it is evident that in the absence of drastic and long-term

⁴⁶ «*Turistici solo gli alloggi con fosse settiche*»: la norma di Brugnaro piace agli albergatori, «veneziatoday.it, 2019 apr.9.

⁴⁷ Report submitted on 15 February 2018 during the conference: *Sappiamo dove va Venezia? Quel che resta della Città d'acqua e del suo artigianato (Emorragia di artigiani, in quarant'anni dimezzati: "Salvaguardare le peculiarità di Venezia"*, «Veneziatoday.it», 2019 feb. 11).

actions, the city is destined to irreversibly lose its character of urban complexity». And the President of the association adds that it is clear that «the protection of Venice cannot take place without the protection of and support for its artisans, who are still a social glue, a generator of income and jobs and also of beauty and value». According to another report by Confcommercio, the association of shopkeepers, more than 200 hotels, restaurant and cafe enterprises were established in the last ten years⁴⁸ (Fig. 8).

Our conclusion: the information provided here puts in doubt the affirmation in Decision 41 COM.7B.48, Recommendation no. 8: «Notes that progress has been made towards the implementation of some of the 2015 Reactive Monitoring mission recommendations...»
To our opinion the recommendations of the *Mission Report* have not been implemented.

- **DECISION 40 COM 7B.52, RECOMMENDATION NO. 9:**

«**Requests furthermore the State Party to revise the proposed buffer zone for the property in line with the ICOMOS technical review and submit it to the World Heritage Centre as a minor boundary modification, by 1 December 2016, for examination by the Committee at its 41st session in 2017**»

Subsequently, in the meeting of the Steering Committee on March 14, 2017, the Site Referent (Municipality of Venice), disregarding the WHC indications, proposed a considerably larger Buffer Zone, including the Metropolitan City of Venice, the Drain Basin of the Venice Lagoon and the Regional Landscape Plan (PPRA) "Adriatic Coastal Arch, Venice Lagoon and Po Delta" (the latter instrument, moreover, never adopted).

Decision 41 COM.7B.48 adopted in Krakow in 2017 refers to Decision 40 COM.7B.52, therefore also relating to the Buffer Zone of the Unesco site "Venice and its Lagoon".

Subsequently, the Ministry of Cultural Heritage and Activities, in the session of the Regional Commission for Cultural Heritage on 30 October 2017, expressed a favourable opinion on the confirmation of the delimitation of the Buffer Zone as defined in 2012, previously defined on the basis of numerous investigations carried out by the Offices operating in the territory, with the maintenance, therefore, of the body of water before the Lagoon, already part of the 2012-2018 Management Plan, shared at the time by the Steering Committee, published on the website www.veniceandlagoon.net and approved by the Municipality of Venice by resolution of the City Council November 9, 2012, No. 527. In addition, the Ministry of Cultural Heritage and Activities expressed a non-favourable opinion on the extension proposal illustrated by the Website Referent (Municipality of Venice) at the Steering Committee meeting of 14 March 2017.

At the meeting of the Steering Committee on 16 November 2017 and in the subsequent *2018 Report* on the Conservation Status of the Site presented in December 2018, the Site Referent (Municipality of Venice) confirmed its "extended" proposal.

The concerns expressed by the Ministry of Cultural Heritage and Activities appear to be shared: a Buffer Zone of remarkable dimensions but without any legal and direct protection tool has no use (the site "Venice and its Lagoon" is protected according to the article 136 of the legislative decree no. 42/2004).

- **DECISION 40 COM 7B.52, RECOMMENDATION NO. 10:**

«**Finally requests that the State Party implement all urgent measures highlighted in the mission report and submit to the World Heritage Committee a detailed report on the state of conservation of the property and the implementation of the above, by 1 February 2017 for examination by the World Heritage Committee at its 41st session in 2017, with a view, if no substantial progress is accomplished by the State Party until then, to consider inscribing the property on the List of the World Heritage in Danger**».

Since the **urgent measures highlighted in the Mission Report** have not been fully observed, the World Heritage Committee at its 41st session in 2017 has made a mistake not having

⁴⁸ E. PENDOLINI, *Solo una politica illuminata salverà il commercio in città*, «da Nova Venezia», 2019 mar. 8.

registered **the property on the List of the World Heritage in Danger** and giving instead two years of extension.

As the **urgent measures highlighted in the mission report** have hardly been implemented the World Heritage Committee, in our opinion, made a mistake at its 41st session (2017) by not inscribing the property **on the List of the World Heritage in Danger**.

In conclusion, the informations provided here show that not even the eight Recommendations put forward in Decision 40 COM 7B.52 have been totally implemented, nor the Recommendations put forward in the *Mission Report*.

We have now reviewed all the Recommendations put forward in Decision 40 COM 7B.52 and those in the *Mission Report* (which were endorsed by Decision 40 COM 7B.52, recommendation no. 8). We now return to the review of the other Recommendations of Decision 41 COM.7B.48.

DECISION 41 COM.7B.48, RECOMMENDATION NO. 5

«**Acknowledges** the drafting of the Climate Plan and encourages the State Party to take into account the “Policy on the Impacts of Climate Change on World Heritage Properties” in the development of the plan, considering that ‘Venice and its Lagoon’ is in a privileged position and might have the potential to influence monitoring and adaptation processes that can be applied elsewhere».

The Report, as a response to Recommendation no. 5, presents some key issues numbered from no. 2 to no. 5 and many projects, such as the *Patto dei sindaci* (Covenant of Mayors), to reduce emissions. There are also reported reductions in consumption due to the “large-scale introduction of LEDs”, moreover “The consumption of the vehicle fleet fell from 1,528 MWh to 1,010 MWh”. It is difficult for non-technicians to assess this data, so we shall not dwell on it⁴⁹.

However nothing is planned to reduce the naval emissions that represents a large and growing source of greenhouse gas emissions. Maritime transport emits around 940 million tonnes of CO₂ annually and is responsible for about 2.5% of global greenhouse gas (GHG) emissions (according to the [3rd IMO GHG study](#)).

Moreover, ships are also a major source of local air pollution «In order to document the air pollution NABU⁵⁰ did air quality testings in different port cities, in particular next to cruise and ferry terminals. No matter if Hamburg, Venice, Barcelona or Bergen: All ports showed a similar result which gives rise to concern. The levels of ultrafine particulates (a subgroup of particulate matter), which are especially harmful for human health in the ship’s exhaust gases were up to 100 times above the normal load, the so called background pollution. Compared to what has to be considered as “clean air” the particle numbers exceeded the concentration level by more than a factor 400. While 1,000 particles per cubic centimeter are harmless, NABU’s scientist found up to 400,000 (pt/cm³) next to the terminals. Air pollution levels like this even surpass concentrations next to main roads with dense traffic between 50 to 80 times. As ports are often located in city centers or close by cities, their air pollution endangers many people’s health. Particulate matter causes and worsens coronary and pulmonary diseases. There are no numbers for port cities in particular, but studies show that about 50,000 people in Europe die prematurely because of the ship emissions emitted in European high-seas»⁵¹.

Cruise ship emit almost three time as much black carbon as the average container ship⁵², and in addition to health issued, black carbon has an impact on climate that is 460-1500 times stronger than Co₂⁵³.

In the *2018 Report* (p. 38), item no. 5 «**Other environmental policies linked to mitigation and adaptation strategies**» is very important as is focused on pollution which affects greatly the site:

- «**Measures for containing atmospheric pollution**» (Report, pp. 38-40)

The *2018 Report* (p. 38) refers to «Measures for containing atmospheric pollution»

⁴⁹ The desire to reduce consumption does not emerge, however, in other contexts: we recall the Mayor's idea of celebrating the 100th anniversary of the Marghera industrial hub by illuminating a lighthouse called "Ramses", a 72,000 KW light beam pointing towards the sky, 12 thousand metres high and visible from Monte Grappa (Fig. 9). This is in contrast with the Regional Law on Light Pollution (No. 22/1997) and he subsequent No. 17/2009. Statements were presented by some astronomers to the Procura della Repubblica (Public Prosecutor's Office) and to the Corte dei Conti (Court of Auditors) for revenue damage, public money having been spent for a *contra legem* plant.

⁵⁰ NABU, Nature And Biodiversity Conservation Union, is one of the oldest and largest environment associations (more than 700,000 members) in Germany. His commitment is the conservation of threatened habitats, flora and fauna, climate protection and energy policy.

⁵¹ *NABU measures air pollution from cruise ships*, <https://en.nabu.de/issues/traffic/air-testing.html>

⁵² This assertion and the one reported in the following note have been reproduced in some posters put up along the Venetian streets by the association “We are here Venice”. B. COMERS ET AL., *Black carbon emissions and fuel use in global shipping*, 2105. *Report*, 2017 (www.theicct.org).

⁵³ *Climate & Clean Air Coalition 2017-2018 Annual Report*, 2018, www.ccacoalition.org/en/resources/climate-clean-air-coalition-2017-2018-annual-report.

Venice is perhaps the only European city to lack a complete network of air quality monitoring stations. Until 2017, there was only one station, on the Island of Sacca Fisola in front of the Maritime Station. And here we see how the City Government is centred on the mainland: all the other monitoring stations were all located there.

In November 2014, many associations (including Italia Nostra) and private citizens together presented a petition for the application of the requirements set out in the EU's Air Quality Directive (2008/50/EC).

This petition (no. 2014/2288) is based on several observations grounded on the infringement of the directive 2008/50/EC and refers to ships and boat traffic in Venice:

- a) non-compliance with Artt. 6 and 7: location of sampling points;
- b) non-compliance with the PM10 limit value for the protection of human health;
- c) non-compliance with the NO2 limit value for the protection of human health.

The petition 2014/2288 was admitted on June 13, 2015: la Committe on Petition so summarized it: «According to the petitioner, the fixed sampling point located in Venice on the artificial island of Sacca Fisola is not in conformity with criteria established by the directive mentioned above. This state of affairs is allegedly giving rise to distorted pollution readings that are therefore not representative of the actual levels of pollution to which the population is exposed. The petition also highlights the fact that, in spite of the above, the thresholds laid down by European legislation for particulate matter (PM10) and nitrogen oxide have reportedly already been largely exceeded without any action being taken by the competent authorities».

The *Commission reply*, on 30 march 2016, claims: «Where confirmed, the above circumstances may represent a breach of Articles 6 and 7 of Directive 2008/50/EC The Commission has already opened two infringement procedures for the breach of Articles 13 and 23 of Directive 2008/50/EC with regard to PM10 and NO2 concentrations in Italy. And it is currently investigating whether the facts raised by the petitioner would justify an additional letter of formal notice with regard to the number and location of sampling points in the city of Venice, as well as the lack of adjusted air quality plans for NO2 in the Veneto region, as required by Commission Decision C (2012)4524 final of 6 July 2012»⁵⁴ and to ensure that the measurement of pollutants is extended to PM2.5.

In fact, the only sampling point in the territory of Venice (that does not measure PM2,5 but only PM10) is located upwind with regard to the above source of emissions, while the Directive requires measuring air quality close to traffic sources, and is reported as “background station”. This amounts to not assessing the impact of local and maritime transport on air quality and thus not measuring the real exposure of population and of 30 million of tourists. For example measures of nanoparticles taken close to the sampling station are low as 2000 particles per cm³. Measures of nanoparticles taken closer to the traffic and downwind are from 4 to 80 times bigger (Fig. 10 e 11)⁵⁵.

The petition is still open.

In 2017 a second monitoring station was set up in Venice, in Rio Novo, a comparatively narrow and trafficked canal. The *2018 Report* (p. 38) claims that «Starting from September 1, 2017, the Municipal Administration has strongly campaigned for the installation of a traffic monitoring station in Rio Novo in the historic city centre of Venice, in order to obtain a more complete overview of trends in atmospheric pollution in the lagoon»

There is no indication that the Municipal Administration «strongly campaigned» for this station: the request came first from a citizen, Professor Mozzatto Gardazzo, in July 2015. Receiving no reply, the professor then appealed to the Office Guaranteeing Human Rights (*Garante dei diritti della Persona*) of the Veneto Region – and only in September 2017, following the determined actions of this citizen as well as the petition mentioned above, was the second monitoring station installed.

The *Report*, p. 39 states: «An analysis of the historical series of each of the monitored pollutants confirms what stated in the previous Report issued in February 2017 with respect to the significant

⁵⁴ See also the European Directive 2016/2284, effective since 31th December 2016, and enforced in Italy with Dlgs no. 281 of the 30th May 2018, which recently sets national emission limits.

⁵⁵ According to the survey campaign carried out in 2016 by professor Freidrich Axel (NABU) and the local associations Comitato Nogradinavi and Ambiente Venezia.

improvement in air quality accomplished and demonstrated by scientific evidence. Specifically, the trend is improving or stable for all parameters (with none worsening). There are still critical issues regarding the ozone, benzo(a)pyrene and particulate matter and an uncertain situation in relation to nitrogen dioxide».

According to Professor Mozzatto Gardazzo, who has followed air quality in Venice for some time, the reduction of PM10 exceedances in 2018 was principally due milder weather, which meant that heating systems were turned off earlier in the spring and turned on later in the fall. While for NO₂, measured in Rio Novo only from September 2017, the values in 2018 were much higher at Rio Novo than any other monitoring stations in the Province (now the Metropolitan City): there were in fact four exceedances of the limit value of 200 µg/m³.

In the first four months of 2019, both the Sacca Fisola and Rio Novo monitoring stations recorded record increases in daily levels of PM10 (at levels of 32 and 40 µg/m³, compared to peaks of 31 and 39 respectively in 2018), and six exceedances of the level of 200 µg/m³ between the two stations.

The *Report*, p. 39: «The Rio Novo station is confirming the typical spatial and temporal distribution characteristics of PM10 and is showing some critical issues related to levels of NO₂».

In late 2017 the Rio Novo monitoring station showed that the average level of nitrogen dioxide was above the annual limit value. The peaks of nitrogen dioxide levels were higher than those seen in all the mainland stations in the former Province of Venice. Also for PM10, problems were seen: in only four months, the 35 day limit value was exceeded.

Only in April 2019 did the City of Venice issue an ordinance for Rio Novo – after Professor Mozzatto received the data showing that limit values had been exceeded and after the District council of Venice, Murano and Burano (called *Municipalità*) voted unanimously request that the Mayor take action (in November 2018). But the ordinance appears inadequate compared to the problem: in the mornings, which is when the peaks in nitrogen dioxide levels are found, taxis boats will continue to pass through Rio Novo in both directions while freight boats will pass one way (from Piazzale Roma to the Grand Canal).

Moreover, local waterborne public transport is highly polluting.

Report, p. 42 «the Municipal Administration approved the ... replacement of traditional diesel-engine public means of transport circulating on the island of Venice Lido and Pellestrina (approximately 30 registered between 2000 and 2004) with the same number of electric vehicles.

In other words, the bus fleet is being modernised – but waterborne public transport vessels (the *vaporetti* as well as larger ferries) remain old, noisy and polluting. Years ago, electrically powered boats were tested but this didn't see permanent service.

Domestic water traffic in fact is a major pollution source. This traffic has greatly increased in recent years. More than 50,000 boats have received the “LV” authorisation that allows crafts with more than 10 hp motor to navigate in the Lagoon. Plus there are thousands more without the authorisation.⁵⁶ (Fig. 14).

The emissions from the *vaporetti* and ferries threaten health, attack the stones of Venice, as it is evident to all. The measurements made by NABU⁵⁷ have proven that in the *vaporetti* (public waterbuses) a concentration of 30,000 microparticles is reached, when the amount to consider clean air is 1,000-2,000 per cm³, and the Rialto bridge is as polluted as a highway tunnel (see Fig. 12: Scalzi bridge).

- «Implementation of the New Po Valley Agreement»

The *2018 Report* (p. 40) refers to this agreement in discussing air pollution: «The Municipal Administration enacted the important interregional agreement “Plan agreement for the coordinated and joint adoption of environmental rehabilitation measures to improve air quality in the Po Valleys». This agreement – between the regions and the national government – does not do a thing to address air pollution from waterborne traffic. Possible actions to restrict boat traffic during high-pollution episodes are not included (though the agreement does include actions to restriction motor vehicle

⁵⁶ *Polveri killer, piazza San Marco è più inquinata di Pechino*, www.raiply.it/programmi/petrolio/.

⁵⁷ <https://youtu.be/bP21MzRwM7Q>

traffic in mainland cities); nor are contributions to replace the most polluting boat engines or to support the distribution of alternative boat fuels.

- «Blue Flag 2018 Agreement»

The *Report*, p. 40 refers to «The Blue Flag 2018 Agreement».

«Again in 2018, the Municipality of Venice, the North Adriatic Sea Port Authority and the shipping companies operating in the lagoon signed the voluntary agreement “Venice Blue Flag 2018”. As already described in the State of Conservation Report dated February and April 2017, under this agreement, cruise companies undertake to fuel the main and auxiliary engines of their ships on marine fuels with a sulphur content no higher than 0.1% in mass and this when at berth as well as during navigation and manoeuvring within the Venice port area».

So the *Blue Flag* agreement signed by the cruise ship companies foresees a limit of 0.1% sulphur in fuel during navigation in the Lagoon and when ships are at dock. But this agreement is a red herring: the limit of 0.1% sulphur is 100 times higher than that required for fuels used on the mainland⁵⁸! Moreover, no reductions are foreseen for the emissions of fine particles!

The great majority of cruise ships do not use any emissions control system – something that ordinary automobiles do. The ships leave behind them huge quantities of pollutants (particulates, black carbon, sulphur oxides and nitrogen oxides) that are grave health risks, provoking illnesses including cancer, asthma, cardiovascular and neurological diseases. In fact, air pollution from ships causes 50,000 premature deaths in Europe each year. This pollution also damages ecosystems, contributes to acidification and to the eutrophication of waters, and it deposits sulphur on the stones of buildings, a major risk for Venice. Venetian stone is largely white Istrian limestone. This stone is used not only as an ornamental stone but for structural purposes, as columns and pillars. Sulphure dioxide and nitrous oxide reacts with its calcium carbonate to produce a gypsum crust (the fragile black exterior) (Figs. 13, 14 e 15).

The European Commission has opened two infringement procedures, for the breach of Articles 13 and 23 of Directive 2008/50/EC with regard to PM10 and NO2 concentrations in Italy: Procedure n. 2014/2147, Bad application of Directive 2008/50/EC on ambient air quality – Exceedance of PM10 limit values in Italy, now in the phase of reasoned opinion; and Procedure n. 2015/2043, Bad application of Directive 2008/50/CE on ambient air quality and in particular the requirement to respect levels for nitrogen dioxide (NO2), also in the phase of reasoned opinion⁵⁹.

Pollution is persistent, not limited to transit along the Giudecca Canal. The Port of Venice is within the historical centre, a few hundred meters from the populated district of Santa Marta (Fig. 16). A study carried out in the port city of Civitavecchia by the Lazio Region’s Department of Epidemiology estimated that the population living within 500 metres of that city’s port was subject to a 51% increase in mortality from neurological diseases and a 31% increase from lung cancer⁶⁰. A large ship (120,000 TSL) during transition consumes 3.5 tonnes of fuel per hour, and at berth, 3.3 tons of fuel per hour. The average stay is 19 hours so fuel consumed amounts to 34 tons for each cruise ship and each stay. Venice receives 5-7 of them each weekend in the spring and summer.

And there are summer days when even more cruise ships: on 21 September 2013, a day when there were protests in Venice against cruise ships, 12 were in the port⁶¹. The Ambiente Venezia committee estimated the impacts on that day – a total of 771,978 gross tons, 19,539 passengers and 8,370 crew members for a total of 27,909 persons (half of all the citizens of Venice!). And – 1,334 tonnes of PM2.5 emitted, the equivalent of 2.668 million automobiles (twice the number that are found in Milan) driving an average of 50 km/day (or 89,000 automobiles driving 24 hours a day). Plus 30 tonnes of NOx, equivalent to the emissions of 5.217 million automobiles driving 50 km⁶².

⁵⁸ *Piano regionale di tutela e risanamento dell’atmosfera - Regione Veneto*, p. 309.

⁵⁹ eurinfra.politichecomunitarie.it/ElencoAreaLibera.aspx

⁶⁰ www.deplazio.net/images/stories/files/rapporto-coorte-civitavecchia-maggio2016.pdf. Citata dalla lettera dall’associazione Cittadini per l’aria ai Ministri Costa e Toninelli.

⁶¹ <https://www.youtube.com/watch?v=EXYGfbIaLmc&feature=share>

⁶² From the hydrodynamic point of view, moreover, at each passage of large ships the water level in the neighboring canals drops by 20 centimeters, as can be seen with the naked eye (www.youtube.com/watch?v=1Qw4wjFppXE) and confirmed

On 3 May 2019, the group *Cittadini per l'aria* (Citizens for the air), together with other associations⁶³, sent a letter to Ministers Costa and Toninelli calling on the government to join France and Spain in the proposal to adopt an Emissions Control Area in the Mediterranean and in all European seas. The proposal will be discussed during the next Environment G7. The letter reads:

«...as indicated in the European Commission's recent study, the largest share of maritime [air] pollution in Europe is produced in the Mediterranean Sea.

“Among transport emissions, those from maritime sources are growing... The analysis shows that, in the absence of these courageous measures for maritime transport in Europe, this sector's CO₂ emissions will grow 130% by 2050. A similar growth is foreseen for NO_x emissions from maritime transport which, if not reduced as soon as possible, will by 2050 exceed those produced on the mainland...”

“The pollutant NO₂ is associated with tumours and with leukaemia in children... the World Health Organization has shown that there are impacts on health at levels well below the current legal limit of 40µg/m³. By using heavy oil... and without any system of emissions controls, ships emit enormous quantities of particulates that contain dangerous pollutants for health, among them sulphur, which determine – only as one example – an increase in stomach tumours of 92%, while black carbon has, in relation to its mass, a climate impact 460-1500 times higher than those of CO₂. Sulphur emitted by ships was, only a few months ago, identified by the Environmental Protection Agency of the Emilia Romagna region in significant quantities in [the inland city of] Parma, a sign that ship emissions from the Ligurian Sea are transported hundreds of kilometres into the mainland... The maritime sector... only at European level, over 50,000 premature deaths a year».

NABU states: «this irresponsible behaviour of a whole industry has to stop!»⁶⁴. The German Association demands: «All cruise ships need to switch to low sulfur fuel immediately» and to «built in emission after treatment techniques (diesel particle filters and SCR), that effectively limit the black carbon, SO_x and NO_x emissions».

In fact, «a switch to low sulphur fuel combined with the installation of particulate filters and SCR catalysts would reduce air pollution by up to 99,9%»⁶⁵.

We contend that NOTHING EFFECTIVE HAS BEEN PLANNED TO reduce air pollution.

We also complain that the *2018 Report* does not discuss the serious problem of air traffic pollution or the depollution of the Marghera industrial areas problem. On the contrary, below we briefly deal with these two very serious problems:

- Pollution from air traffic

Airplanes arriving at and departing from Venice's Airport (p. 59) also produce pollution in the Lagoon. In 2005, the Environmental Protection Agency of the Veneto Region estimated these emissions as in Fig. 17⁶⁶. However airport traffic has increased significantly since then.

Moreover, Italy's national government is funding a further increase: the Ministry of Infrastructure has guaranteed financing of 540 million Euros for the period 2017-2021 so that the airport can increase from 9.5 million passenger in 2017 to 11.6 million in 2021 and 13 million in 2035⁶⁷. The President of the company managing the airport commented: “It will be an airport every more focused internationally to support the growth of tourism in Venice and the Northeast [of Italy]”⁶⁸.

by the Port Authority, Municipality, CNR. So that day we had, in addition to the normal and slow tides, other 24 high and low tides, provoking the disruption of the millennial rhythm of the Lagoon.

⁶³ Among them: Associazione Ambiente Venezia, Comitato No Grandi Navi - Laguna Bene Comune, Italia Nostra Ancona, We Are Here Venice.

⁶⁴ *This stinks!* – NABU's campaign for a cleaner cruise industry, <https://en.nabu.de/issues/traffic/cruiseships.html>.

⁶⁵ NABU measures air pollution from cruise ships, <https://en.nabu.de/issues/traffic/air-testing.html>

⁶⁶ http://www.arpa.veneto.it/arpav/chi-e-arpav/file-e-allegati/dap-venezia/aria/Relazione_tecnica_emissioni_aeroportuali.pdf

⁶⁷ M. CHIARIN, *L'aeroporto raddoppia: 16 milioni di passeggeri entro il 2035*, «nuovavenezia.geolocal.it», 2018 dic. 17.

⁶⁸ N. BRILLO, *Marchi: strategia vincente*, «La nuova Venezia», 2017 mag. 19.

Venice needs the provision of a serious plan that requires ships to use filters or other pollution control devices – “like in normal towns” for car traffic. These requirements should affect ships, vaporetta, commercial boats and taxis. Venice needs also a plan to buy back the oldest, most polluting marine motors is necessary, possibly using EU structural funds⁶⁹.

The exponential growth of the airport must be stopped. The situation is very severe.

- Depollution of the Marghera industrial areas

The *2018 Report* does not address here the problem of the contamination and cleanup of the industrial areas in Marghera, on the mainland. The *2018 Report* does refer (p. 90) to «The general Plan of the interventions for the safeguard of Venice and its lagoon “Mose system”» which involves a vast programme of works, entirely funded by the Italian State», which includes among other things, «the containment of dumps and canals in the Porto Marghera industrial zone (7 polluted sites and protective barriers placed along 40 km of banks and shore)». On pp. 101-102, the *2018 Report* refers again to the industrial areas but only mentions the «Programme Agreement for the industrial conversion and requalification of the complex industrial crisis area of Porto Marghera».

Nothing further is written on the serious problem of pollution in this area and the nearby waters of the Lagoon.

The principal soil contaminants found at Porto Marghera include heavy metals, cyanides, IPA, dioxins, PCBs, chlorinated solvents, benzene and its derivatives, pesticides, CVM, all at levels reaching hundreds of times the admissible limits.

The first Master Plan for the cleanup of Porto Marghera was issued in 2004. While the analyses of this pollution are largely complete, the cleanup projects are moving slowly.

So far, only 50 hectares have been cleaned up. The recovery of the whole industrial area could see the launch of an area for new industry, an occasion to relaunch the local economy – this area already contains the necessary infrastructure and its reuse would reduce land take and sprawl linked to the construction of industrial areas around the mainland shores of the Lagoon.

The plan includes the construction of an underground barrier about 40km in length (Fig. 18) to stop contaminated groundwater leaching into the Lagoon. But in September 2016, an investigating committee at the national Parliament found that this work was not completed, with about 4.5 km missing, while some of the underground metal barriers installed were already corroding (Fig. 19).

At this moment, 4 km of work is still needed to complete the barrier, but the gaps are particularly difficult to fill as they coincide with areas where underground pipes pass. An important part of the overall plan is the cleanup of the groundwater – a large draining tube, buried 4 metres underground and running along the barrier line, should collect groundwater and send it to a new wastewater treatment plant (the so-called *Progetto Integrato Fusina* plant). But this facility can't enter into operation until the line of barriers is closed. So far, 800 million Euros have been spent and another 300 million are needed to close the barriers – without a closure, contaminated groundwater will continue to percolate into the Lagoon.

The barrier, 12 to 20 metres deep, should substantially reduce the quantity of hazardous substances that enter the Lagoon from this contaminated site – but it will not cleanup the site itself, which will take decades.

One key concern is that the boundaries of the industrial site of Porto Marghera SIN (*Sito di interesse nazionale*), originally identified in 2000 (Fig. 20), were redrawn in 2013 (Fig. 21). The Industrial Channels, whose sediments are particularly contaminated, are now excluded from the perimeter; this excludes the oversight of the Ministry of Environment.

The first update of the River Basin Management Plan for the Eastern Alps (*Primo aggiornamento del Piano di Gestione delle Acque*) (2016) indicates that all the water bodies of the Lagoon of Venice have “good” chemical status (as per the requirements of the EU's Water Framework Directive), while seven have poor ecological status (and three have satisfactory status and for other six of them the ecological status is unknown).

⁶⁹ This proposal is by the association Gruppo25aprile.

However, since the first Plan was adopted, the industrial channels have not been included in this assessment – and this is an incomprehensible decision, given that these industrial channels are highly contaminated. In fact, of the million cubic metres of sediment dredged from the channels between 2004 and 2012 (to allow large ships to pass⁷⁰), over half – 525,200 cubic metres, were classified as particularly polluted, needing to be disposed in secure areas or treated outside the Lagoon. Moreover, dredging had to be halted for alack of appropriate treatment plants.

If we look at Fig. 22 and 23 (available from the Port Authority's web site), we see that the passage of two commercial ships stirs up the sediment from the bed of the ship channels. The highly contaminated sediments are then spread by the Lagoon's currents! Strictly speaking, the passage of ships in the industrial channels should be prohibited by law as it stirs up these contaminated sediments.

In conclusion, based on the information we have provided above, we contend that Decision 41 COM.7B.48, Recommendation no. 5 has not been fully observed: NOTHING EFFECTIVE HAS BEEN PLANNED TO reduce Aviation and maritime emissions, increasing rapidly, which affect enormously human health, the conservation of monuments and global warming.

⁷⁰ In the Lagoon, the sediment displaced by the wash from boats, the wind and clam fishing settles in part in the canals. For this reason, since 2004 until 2012 over 7,000,000 cubic metres of sediment have been dredged from the Canale dei petroli and other Industrial Channels (per permettere l'esistenza di un porto profondo dentro una Laguna poco profonda). Tutto ciò è stato possibile solo con the institution of the Special Commissioner regime.

DECISION 41 COM.7B.48, RECOMMENDATION NO. 6

«**Welcomes** the details submitted regarding the new sustainable tourism strategy that will make use of the consultative model proposed by the UNESCO Sustainable Tourism Programme»

Tourists (both those staying overnight and day trippers), hotels and other tourist residences are all increases – due also to the two years of delay conceded by the WHC, and Decision 41 COM.7B.48 was understood by the City Government as an approval for its approach to the ‘protection’ of Venice.

The City’s 2018 Report dedicates extensive space to the **new sustainable tourism strategy** and refers to a programmatic document in Italian entitled *Progetto di governance territoriale del turismo a Venezia* (*Project of territorial governance of tourism in Venice*, hereinafter the *Project*)⁷¹.

This strategy is, in our estimation, ineffective and contradictory: two of the principal provisions (both debatable) have already been cancelled⁷²: the turnstiles and the repositioning of the large tourism boats (the so-called *Gran Turismo* motorboats). In our view, the strategy has no intention of reducing tourism, only spreading the flows throughout the city and thus increasing tourism overall.

The 2018 Report (p. 42) claims that the *Project* “is the synthetic result of the complex work carried out by the Municipal Administration with the involvement of Trade Associations, sector experts and operators and ordinary citizens”. In reality, neither citizens nor associations for the protection of Venice nor Venetian committees contributed to the *Project*.

It is true that between October 2016 and February 2017, there were meetings of citizens, committees and associations with four commissions of the Municipal Council. Professor Jan van der Borg, an expert on tourism at the Ca’ Foscari University of Venice, reports that «there was a sort of popular consultation to gather a series of ideas, some of them sophisticated, for the management of tourism in Venice, which has become unsustainable. These ideas, after being published on the City’s web site, were then very rapidly put aside. They were too sophisticated, evidently, for the ‘*paron de Venesia*’ (the ‘master of Venice’).

Italia Nostra participated in one meeting, on 7 November 2017. The results were discouraging: a City Councillor for the majority claimed that our project to progressively contain the number of tourists, formulated with the goal of moving towards the level of carrying capacity identified in two celebrated studies (by Costa and van der Borg⁷³ and by COSES⁷⁴) were not scientific; the «40,000 people in Venice live from tourism and the 1800 stalls» for tourists were instead highlighted⁷⁵.

This is the point: all recent city administrations and governing coalitions have lacked a long-term strategy – they have been incapable of producing a vision of the city different from the easy prospect of tourism. As a City Councillor said back in 2011: «tourism impedes Venice from making choices... Venetians are no longer able to make choices, they have a one-way socio-economic configuration that impedes any initiative: either they work in the tourism sector or they leave. Tourism has become ever more invasive, while other sectors in Marghera, Murano and the centre have become deserts. We have made grave mistakes: we are making the same wrong choices with tourism that we made 20 years ago

⁷¹ Report 2018, Annex 2_Rec. 6.

⁷² Brugnaro sul turismo fa come i gamberi, «nuovavenezia.gelocal.it», 2019 apr. 25.

⁷³ P. COSTA, J. VAN DER BORG, *Un modello lineare per la programmazione del turismo. Sulla capacità massima di accoglienza turistica del Centro Storico di Venezia*, «COSES informazioni», 32-33 (1998). According to the study, the city was on the verge of capacity with 20,750 tourists per day, 13,000 overnight guests and 7,750 day-trippers. There are now about 30 million tourists per year, which means on average 82,000 tourists per day, twice the size of local populations (P. LANAPOPI, *Caro Turista*, Venezia 2011).

⁷⁴ *Turismo sostenibile a Venezia*, COSES, Rapporto 141.0, marzo 2009.

⁷⁵ “Troppi 30 milioni di turisti, vanno ridotti”: le proposte di Italia Nostra. *Crovato: ma ricordiamo i 40 mila che vivono di turismo*, «la Nuova Venezia», 2017 nov. 8; E. LORENZINI, *Il pontile Actv diventa un ‘ostello’. E sui limiti di Italia Nostra è scontro. La proposta piace al Pd, ma è bocciata dai fucsia. Crovato: dati non scientifici*, «Il Corriere del Veneto», 2017 nov. 8. Another city councillor objected that there were still areas of the city not frequented by tourists, where visitors could be diverted. Of course it is not difficult to oppose that few tourists would be willing to visit campo della Celestia instead of Piazza San Marco.

with the chemicals sector in Marghera, and we risk finding ourselves in 15 years with the same crisis conditions. We need to have the courage to promote weaker activities to recreate the complexity of the city»⁷⁶.

Recreate the complexity of the city. This should be the *motto*, the lodestar for Venice. Instead, the City Government focuses on saving and increasing jobs in the tourism activities, with a plan, even for the long term, to change an economy centred on tourism: «the easy money from tourism crushes the good intentions of people who seek to bring back the artisan and industrial configurations of the territory»⁷⁷. It shouldn't just be individuals who seek to change the trends and open traditional activities for residents who are leaving. It should be the national government and the City Government, using financing from the Special Laws for Venice to provide incentives for non-tourism activities for residents.

Italia Nostra had figured out and proposed a number of measures aimed at reducing the loss of population and at encouraging residency. Such proposals were ignored by all administrations, national and regional as well as local. They included: 1. The imposition of well defined limits to the transformation of apartments into touristic structures, improperly called “bnb” or “bed and breakfast”. Many cities worldwide already have implemented measures for the same purpose, and those cities can provide useful benchmarks (Barcellona, Paris, New York, San Francisco and many more, often with an explicit mention of the need to avoid the “Venice effect”, also called “the venetian disease”); 2. The institution of a “Fiscal Bonus” (following the example of the existing “Art Bonus” recently introduced in Italy, a tax discount for donations in support of art and culture). Such Bonus should be aimed at encouraging apartment owners to rent to residents (instead of tourists) and at encouraging the young to buy their homes in Venice.

The main objectives that the City Government identifies in its **new sustainable tourism strategy**, as a response to Decision 41 COM.7B.48, Recommendation no. 6, are grouped in four thematic areas that we will review in detail. Please note that the objectives mentioned here do not include a limitation, reduction or moderation of the touristic flows, including the day trippers who stay in the city only a few hours:

A. Managing the resource

B. Protecting the residents

C. Balancing extra costs to promote the improvement and development of the city

D. Innovating communication and marketing. Educating towards responsible and sustainable tourism

A. MANAGING THE RESOURCE. Here there are many objectives:

A.1.

Control Room: know the resource in order to plan decisions e

A.2. Smart Control Room

The *2018 Report* says that it is necessary to create a «smart control room ... for planning decisions». For now (*2018 Report*, p. 46 note 36) the smart control room «is currently practically concluding “Stage 2 for assigning the tender including the navigation control system ARGOS”». But the ARGOS system is in part a failure (see p.32 below).

A.3.

- Monitor and control entry points and mobility within the city, also to make it safer

Testing of people-counting systems

Report, p. 47: «In January 2018, the Municipal Administration ... tested technologies for monitoring pedestrian flows in the historic city centre of Venice in order to formulate specifications for a tender aimed at choosing the most appropriate technology for accurately counting tourist flows ... The

⁷⁶ D. GHIO, “*Il turismo impedisce a Venezia di scegliere*”, «Il Gazzettino», 2011 ott. 16.

⁷⁷ D. GHIO, “*Il turismo impedisce a Venezia di scegliere*”, «Il Gazzettino», 2011 ott. 16.

Administration is now drafting an agreement with Venis S.p.a. for the subsequent call for tender to choose the supplier of people-counting systems».

In the two and a half years since Decision 40 COM 7B.5240 there is not yet a system to count tourists. Venetians ironically say that all you need to do is open the windows of your house to understand the situation (Figs. 24-29).

- Policies for the safety and security of people and the local area, control of water traffic and tackling the phenomenon of wave motion

Only two pages of the *2018 Report* (pp. 48) are dedicated to the supposedly important “Onda Zero” (Zero Waves) project, rolled out in July 2017, described as «a consolidated, detailed intervention plan». The lack of space given the important objective of reducing motorboat wakes (*moto ondosso*, Figs. 30, 31) may be due to the fact that the Zero Waves project has been a partial failure.

The *2018 Report* (p. 49) states that the project «measured the speed of 146,561 boats and checked 7,431 boats ... with fixed controls at San Marco Basin, the Grand Canal and Rio Novo, Canale delle Navi». Boat velocities were measured using a laser system and the ARGOS system, according to press articles⁷⁸ (this isn't specified in the City's *2018 Report*). Unfortunately, neither the laser system nor the ARGOS system were approved and many fines were then contested and ended up being annulled by the Justice of the Peace (*Giudice di pace*), which also condemned the City Government to pay appeal costs⁷⁹. *Argos e telelaser bocciati, oltre 400 multe a rischio. "Il comune le annulli"* (*Argos and telelaser failed, more than 400 fines at risk. The City should annul them*) is the title of one article⁸⁰. The *2018 Report* (p. 49) states that ARGOS is «currently being replaced». According to press reports, it appears instead that this system will be updated⁸¹ (and, one hopes, properly calibrated).

In addition, the Justice of the Peace has annulled numerous fines given out in the last five years in waterways around the Lagoon because these are state waters and not city waters, also requiring the city to pay «legal fees that exceed even by three times the amount of the fines»⁸². How is it possible that the city's forces were not aware of this?

ARGOS and the laser systems present further problems; they can't be used at night or in fog because at these times they can't read license plates, which on taxis are placed on the sides in non-reflective characters.

The transit of passenger motorboats, for the most part taxis, takes place along only a few main routes: from the airport to Venice, from Piazzale Roma to St. Mark's and from Piazzale Roma to Rialto. These routes include both urban canals⁸³, for which the City is responsible; urban canals where the Harbour Master's Office is responsible⁸⁴; and Lagoon channels⁸⁵ that used to be the responsibility of the former Venice Water Office (*Magistrato alle acque*), now the Interregional Office for Public Works (*Provveditorato Interregionale per le Opere Pubbliche*). A review and unification of these responsibilities is necessary: is it not possible that the City is responsible in the Grand Canal and then the Harbour Master's Office is responsible in the adjacent St. Mark's Basin!

Taxis are almost totally used by tourists, and this creates a macroscopic distortion not seen in any other city in the world. The route from Venice to the airport costs at least 100 Euros, from Piazzale Roma to St. Mark's, 50 to 70 Euros, and the tariffs increase with the number of passengers and suitcases (and also vary by the time of day). These prices are outside the reach of Venetians. The taxis consequently do not provide a service to the city and its inhabitants but rather are a source of *moto ondosso* (motorboat wakes) and air pollution (in many cases, neither the owners nor the drivers live in Venice or even in the City territory.) In the Figs. 32-35 a moment of rare grace in the Grand Canal can be seen: the water is still during the taxi strike of 13 and 14 November 2013 (from the web site of the newspaper *La Repubblica*).

⁷⁸ E. LORENZIN, *In due mesi 219 multe ma Argos non frena i taxi e i granturismo*, «Corriere del Veneto», 2017 mar. 29.

⁷⁹ M. FULLIN, *Canal Grande, multe annullate "Argos e laser non sono tatati"*, «Il Gazzettino», 2017 mag. 30.

⁸⁰ E. LORENZIN, *Argos e telelaser bocciati, oltre 400 multe a rischio. "Il comune le annulli"*, «Corriere del Veneto», 2017 mag. 31.

⁸¹ *Aggiornamento in vista per Argos*, «la Nuova Venezia», 2010 feb. 20.

⁸² M. FULLIN, *Multe in laguna, "mazzata" sul Comune*, «Il Gazzettino», 2017 feb. 3.

⁸³ Canal Grande, Rio di Cannaregio, Rio Novo.

⁸⁴ Canale Darsena Ovest, Canale della Giudecca, Bacino di San Marco, Canale di San Marco, Canale dei Marani, etc.

⁸⁵ Canale di Tessera, Canale degli Angeli, Canale delle Fondamente Nove, Canale degli Orfanelli, etc.

The “Onda zero” (Zero Waves) project – described in the *2018 Report* (p. 48) – has yielded practically zero results.

The city is lashed by *moto ondosos* that grind down its foundations. To resist these wakes, the walls of the canals are now rebuilt with non-traditional methods, even with cement: this is absurd in Venice, which is now changing in terms of its physical substance (Fig. 36).

In the city, many embankments are lined with steel sheet piles [*palancole*] to reduce the damage. Even San Michele, the monumental church designed by Mauro Codussi, a jewel of the Venetian renaissance, is surrounded by steel sheet piles (Fig. 37). In St. Mark’s Basin, to protect the Piazzetta San Marco, a wave barrier has been installed.

In Venice the *moto ondosos* destroys buildings and embankments. In the Lagoon it destroys the saltmarshes (in Venetian *barene*) and salt marshes and erodes and flattens the Lagoon’s bed. The sediments eroded by the waves are transported by the currents and finish in part in the sea and in part the network of channels, which are filled in and start to disappear. The wakes thus are destroying the morphology of the Lagoon, which has survived for 6000 years.

The *moto ondosos* represents an emergency produced by the growth of tourism (Fig. 38). But recently a new phenomenon has aggravated it: the opening of hotels on the islands around Venice has created motorboat traffic in areas where previously only oar-powered boats passed. And the future will be worse: the national property agency (*Demanio*) is expected to sell or give in concession all of the islands it owns, most likely to go to hotel developments.

Along the Grand Canal speed limits are set at 7 km/hr for taxis, 11 km/hr for the public transport *vaporetti* (which however can go 14 km/hr in St Mark’s Basin); the limits are 5 km/hr in the city’s smaller canals. In the Lagoon, speed limits are inexplicably higher: 11 km/hr in the external canals around Venice, and 20 km/hr in other channels, such as the Tesserà Channel to the airport, but these limits are not respected.

It is impossible to control the whole Lagoon: this would require GPS devices on boats, but the taxi owners and goods transporters have always opposed this. A provincial regulation that introduced such a requirement was annulled by the Regional Administrative Court (*Tribunale Amministrativo Regionale, TAR*) on an appeal from the motorboat operators, stating that only the Mayor of the Metropolitan City (who is also the Mayor of Venice) could establish a requirement for a GPS. The deputy head of the Mayor’s office replied that «This seems to us the occasion to reopen a dialogue with the operators, to find an agreed solution»⁸⁶.

The position of the mayor has been clear since 2015, when in a meeting with economic interests he claimed that the GPS requirement is «an exaggerated measure, and other methods can be found». His proposal then was to increase the speed limit from 7 to 9 km/hr to “streamline” traffic, and to prepare an ethical code⁸⁷.

A GPS system would allow 24-hour traffic control. It could provide a visualisation of the real dimensions of taxi and goods traffic in Venice and in the Lagoon.

Speed limit violations are fined in the same way for all boats: 102 Euros in the channels of the Lagoon and 150 in the city’s canals. A very little amount for a taxi boat that can take in thousands of Euros a day.

The *2018 Report* (point a.3, p. 49) reports that «Ordinance no. 433/2018 was adopted to limit circulation of pleasure boats in the Grand Canal and the historic city centre for both motorboats and row boats, such as kayaks, canoes and similar».

This is a serious provision adopted to improve traffic and safety, limiting and in many cases forbidding the passage in the Grand Canal of canoes, kayaks, pedal boats and other craft for tourists that have been seen more and more frequently in recent years in the canals of Venice. The Venice Kayak srl company, however, made an appeal and the Regional Administrative Court struck down the restrictions of Ordinance no. 433/2018. The company claims: “these are boats with zero environmental impact”. Bicycles too have zero environmental impact but they shouldn’t go on highways – and the canals of Venice are in terms of safety as dangerous as a highway.

⁸⁶ A. VITUCCI, *Battaglia sul Gps, contrari i motoscafisti*, «La nuova Venezia», 2015 ott. 14.

⁸⁷ F. BOTTAZZO, *Traffico acquatico: niente Gps sui taxi Aumenta la velocità in Canal Grande*, «Corriere del Veneto», 2015 lug. 23.

The *2018 Report* only spends four lines (p. 49 it 50) on the problem of freight transport: «Freight transport grows in proportion to the increase in supply volumes, as well as to interventions of urban maintenance and urban solid waste collection and it is proportional to the number of activities in the area and tourist presence».

Only this – no reference to the difficult topic of the Goods Inter-exchange Logistical Centre (CLIM, *Centro Logistico Interscambio Merci*). This Centre was planned to rationalise good traffic in Venice, reducing the transit of boats, the resulting congestion and thus making traffic safer while reducing *moto ondoso*. This could be a fundamental project for the city, one supported by the parties now in opposition and by citizen's associations.

The project was launched by the City Government in 2001, following studies, such as one carried out by the Venice Project Center (VPC)⁸⁸ from 1997 to 2001, which estimated that this approach would reduce the movement of goods boats by 80%. According to another study, which the City requested from the TransCare company of Wiesbaden, Germany, (costing perhaps 900,000 Euros), estimated a 75% reduction. In 2015, the Public Prosecutor at the court of Venice (*Procura della Repubblica*) wrote to the city, stating that this approach was necessary and estimating that it could reduce the number of boats by 50%.

The first study, by VPC, imagined that boats carrying goods would be organised by destination area rather than by clients or products as currently done: motorboats now make numerous tours around the city and numerous boats stop at the same embankment to unload different goods. A freight centre would allow goods for a specific area of Venice to be transported together in fewer boats. Figs. 39-41 show the advantages in terms of the reduction in traffic and distance covered by the boats. The CLIM is a very smart solution. VPC also contacted freight transporters, which indicated their openness to this approach.

In 2002, the Minister for the Interior named the Mayor of Venice at the time, Paolo Costa, as Commissioner of the national government for waterborne traffic in the Lagoon of Venice, to «address the emergency seen in the City of Venice and its Lagoon, including the maritime channels, due to the *moto ondoso* provoked by intense waterborne traffic». The blight of motorboat wakes had finally been understood by the national government.

In 2003, Costa approved a project to build the CLIM on the island of Tronchetto (near Piazzale Roma and the bridge to the mainland). This approval was essentially the only important action taken by the Commissioner.

The City constructed a large building costing 25 million Euros for the Centre for goods traffic (CLIM) (Fig. 42). In 2013, the City launched the first competition for a company to manage the Centre itself (for 40 years with an annual charge of 500,000 Euros) – but no companies responded⁸⁹. A second competition in 2015 saw two groups of companies present offers by the 15 July deadline. However, Brugnaro took office as mayor in 2015. More than 300 days after the deadline, on 17 May 2016, the competition was suspended. The Democratic Party, now in opposition, wrote: «the good Terminal on Tronchetto has been inexplicably blocked after the competition was carried out and the offers already submitted»⁹⁰.

Since 1936, a cooperative company, *Scalo fluviale*, has held a concession from the City to operate the embankment where the CLIM centre was built. No competition was ever held for this concession and the rent is low. Previous city administrations had only extended the concession a yearly basis and “until the activation of the new CLIM”. Brugnaro had other plans.

In October 2018, the Municipal Council approved a proposal to reorganise Tronchetto Island and to cancel the CLIM, designating the building instead for a new wholesale fish market and also allowing the construction of three new hotels (one approved by the previous administration plus two new ones).

⁸⁸ <http://www.veniceprojectcenter.org/vpc>

⁸⁹ For the story of the CLIM, see on youtube: *esposto M5S sul centro logistico interscambio merci Clim*.

⁹⁰ A. FERRAZZI, *Sul moto ondoso c'è immobilismo*, «Il Gazzettino», 2017 apr. 18.

This meant «throwing away more than thirty years of urban planning and the possible resolution of the problem of waterborne traffic and *moto ondoso*»⁹¹.

There is no trace of the once-important CLIM project in the City's *2018 Report*.

The *2018 Report* (point A.3, p. 49) does cite another provision: «testing ways of deviating water traffic from San Marco Basin as the peak area for large-scale tourism boats (so called “Gran Turismo”)».

A City order⁹² moved the docking point of these motorboats on an experimental basis from St. Mark's, as well as by environmental groups, as the heavy *moto ondoso* affecting this area only increased.

The point is that moving the *Gran Turismo* motorboats from one part of Venice to another is not a solution – rather the number of boats needs to be reduced. They arrive also from other municipalities (Cavallino-Treporti, Jesolo, Musile di piave, Quarto d'Altino), dumping hundreds of day trippers in the city streets. «Considering that the average capacity of these boats is roughly 100/120 passengers, overall more than 50,000 people were redirected to the moorings in Fondamente Nove». This is not «managing the flows of tourists from the Municipalities of Quarto d'Altino, Cavallino-Treporti and Jesolo» (*2018 Report*, p. 49), but simply transferring the problem in an area that, on days of high tourist levels, already suffers from the invasion of tourists heading to the islands (Figs. 43-45).

The Mayor of Venice is also, as noted, the Mayor of the Metropolitan City whose territory corresponds to that of the former Province of Venice, suppressed by an administrative reform. This Metropolitan City contains 44 municipalities, among them the municipalities of Quarto d'Altino, Cavallino-Treporti, Jesolo, and Musile di Piave.

In any case, this provision – like that of the turnstiles – has been cancelled⁹³. And this provision closes the list of actions to contrast *moto ondoso* and ensure the safety of navigation. These provisions are ineffective and, in our view, have only been masks. The City Administration should instead take measures to contain and regulate waterborne traffic, as the *moto ondoso* threatens not only the physical structure of palaces, houses, and embankments but also the morphology of the Lagoon itself. These impacts would create huge economic losses that the public as a whole would suffer.

A water traffic consultancy, commissioned by the Prosecutor's Office at the court of Venice (*Procura*), well known even by the Municipality government, is very worrying because it establishes that on the Grand Canal «the compatibility between traffic flows ... is not guaranteed, **nor are navigation safety conditions guaranteed**»⁹⁴.

A few simple measures could tackle the *moto ondoso*, if the political will existed:

- first of all a GPS requirement;
- a reduction of speed limits, above all in the Lagoon;
- stronger traffic controls;
- a system of clear license plates for all boats, with large reflecting characters on the roof or another prominent location (such as the roll bar where the GPS antenna is located);
- the installation of speed cameras that can be used also at night, along the channels of the Lagoon (using a properly calibrated ARGOS system);
- the creation of a register of traffic violations so that monetary fines can grow with repeated offences (starting at a minimum of 1000 Euros up to the sequester of a craft for repeated

⁹¹ www.youtube.com/watch?feature=youtu.be&v=SbBZhW0PM_Y&app=desktop, video by M5S. The Partito Democratico expressed similar opinions (FERRAZZI, *Sul moto ondoso c'è immobilismo*, «Il Gazzettino», 2017 apr. 18)..

⁹² Annexes10 and 11_rec. 6.

⁹³ *Brugnaro sul turismo fa come i gamberi*, «nuovavenezia.gelocal.it», 2019 apr. 25.

⁹⁴ *Relazione tecnica di consulenza per la Procura della Repubblica presso il Tribunale di Venezia sul tema della sicurezza della navigazione nel Canal Grande di Venezia*, pro manuscripto, 2015.

violations and the suspension of nautical licenses for an appropriate period (pursuing the boat, not the driver);

- a slow reduction in the horsepower allowed for motors, perhaps with incentives to introduce alternative fuel and hybrid electric motors;
- and forbidding motorboats from using shallow channels, thus reducing erosion;
- introducing taxis using oars (an innovation likely to be appreciated by tourists); and
- importantly, creating the CLIM, the long-discussed multi-modal centre.

We intend to bring these solutions to the attention of the prefect's office – the representative of the Ministry of the Interior in Venice.

A.4. Coordinate the control and security functions.

This section describes three types of actions:

- Reinforcing the local police force (p. 51)

This point discussed the «reinforcement of the local police» (*2018 Report*, p. 51): «The total number of agents on the local police force has risen from 375 at the end of 2015 to 469 at the end of 2018. A new recruitment is scheduled over the coming months».

The need to recruit an ever-growing number of agents on the local police force is due to the exponential increase in tourists, whose conduct is becoming uncontrollable (Figs. 47-51). This is a huge cost for citizens who seek to live in a normal city.

- Regulations and measures to protect decorum and tackle urban disrepair and unregulated activity.

The *2018 Report* (pp. 51-52) refers to «a series of ordinances ... related to tackling the abuse of alcoholic beverages, the regulation of the so-called “paraders”, a ban on collecting signatures on the streets and disrepair deriving from displaying goods on public streets» and to the new Regulation of the Urban Police which «introduces the so-called “Daspo” provisions which apply fines of between Euro 100 to Euro 300 and an order to leave or ban to access the municipal area defined sensitive for a series of types of behaviour deemed against the decorum of the city, such as diving into Venice's canals, consuming alcohol outside refreshment areas after a certain time of the evening and littering». The need for these provisions has been evident in recent years, as tourism has exploded. The provisions can only address the problem partly – it's not possible to put an agent on every bridge. The problem is always the same: overtourism.

- Agreements with accommodation reservation system operators and agreements with railway operators.

This point (*2018 Report*, p. 52) is surprising. It's stated that: «As part of its #Enjoy RespectVenezia awareness campaign, the Municipal Administration has formed a partnership with Expedia, one of the world's largest online travel agencies. For travellers who choose to book via Expedia, their reservation confirmation includes an invitation to visit the City of Venice».

The accords are to «implement commercial actions to promote travels in periods of lower demand». Venetians fear such moves, as they can mean that there will no longer be a period of the year with a break from tourism. Unfortunately, in the last two years, there has been frequent advertising by the two main Italian railway companies offering low-cost tickets for Venice, already an action that appears to have increased low-season tourism.

A.5. New strategies of urban and metropolitan mobility

Testing a bus quota setting

According to the *2018 Report* (p. 51): «The Administration began preliminary activities for possibly setting a daily maximum limit of ZTL», a positive measure, if implemented.

On p. 53, there is a reference to a provision for the «Activation of Priority access for city users» (on public transport), important for Venetians who on days of maximum tourist visits have difficulty boarding the *vaporetti*. But this priority access is not guaranteed: on the Lido, for example, there is only one entrance for line 5 (and the priority access isn't always available). At the train station and

the bus station (Piazzale Roma), priority access isn't provided in the "red" days and there are long queues to the boats, so Venetians cannot live a normal life.

The *2018 Report* (again on p. 53) refers to provisions for «managing tourist flows to mitigate the critical issues ... on days of greater tourist flows». Specific ordinances of the mayor to «limit pedestrian access in the direction of Piazzale Roma, Santa Lucia Station and Strada Nova, deviating flows to less popular alternative routes». This is the often-debated provision, now well-known in Venice as the "turnstyles".

«The objective is to diversify the distribution of tourist flows to alternative routes»; ; thus, the goal is not to limit tourism put to displace visitors from more congested, central areas to other zones where there is still a remnant of true city life – and which could then be overrun. For this reason, Venetians are against this.

In fact, the turnstyles installed during the 2019 Carnival at the passages leading to St. Mark's Square (Fig. 52) reduced overcrowding there, but the crowds went elsewhere and the city streets become impassable (Figs. 53-55).

The point is not to divert the flows, but to place a maximum ceiling on arrivals.

Professor Jan van der Borg (in the interview cited above)⁹⁵, has said: «Much closer to the disposition and temperament of our mayor... have been instead a few simple, essentially symbolic actions, intended only to fight the symptoms of overtourism in Venice. The war against fast food restaurants and scooters, on the one hand, and crazy turnstyles on the other, are the most striking examples of this tourism non-strategy».

The Municipal Council's leading initiative to manage tourism flows thus has a great media impact but only fought the symptoms, not the causes, of overtourism, and thus lacks substance and is even counterproductive – and, with the initiative to displace the large tourism boats (the so-called *Gran Turismo* boats) from St. Mark's to the Fondamente Nuove, has already been cancelled⁹⁶.

The *2018 Report* (pp. 53-54) cites another initiative, one that appears to favour more tourism arrivals: «a metropolitan ticket valid for 24 hours»: «a new integrated Avm/Actv-Trenitalia Veneto ticket for the Venice urban area and the Padua-Venice intercity link ... at a very favourable price», introduced on smartphones. «The aim of the new integrated ticket "Venezia Metropolitana 24" is to foster integrated mobility within the Venice metropolitan area". From March to June 2018, 85,175 tickets were sold. The initiative appears to allow tourists staying on the mainland to visit Venice more easily – thus favouring tourist accommodations on the mainland, which in the last two years have grown significantly.

A.6. Testing of reservation systems to access the area around San Marco

A.7. Reservation and tourist card systems

In the *2018 Report* (p. 54), it is stated that the Municipal Council in 2017 wanted to regulate access to the area of St. Mark's «via an entry card reservation system". The Administration decided, however, that «The best solution would seem to be the design, planning and execution of a configurable system capable of managing the introduction of reservations ... of the entire historic city centre". We hope that a system of reservations will be put in place, however a method to count the number of tourists has not yet been chosen.

Our association proposed in 2015 that a reservation system for the whole city be tested immediately, starting with organised groups, which can be easily identified via tourist agencies. We proposed this also during hearing at the Municipal Council – it would have been an important step forward.

A.8. Measures to support Venice's tourist guide professionals in order make the most of the cultural offering

A.9. Measures to regulate luggage-handlers

We don't comment on these measures; p. 54: «The pushcarts [of the luggage handlers] are often left unmanned, they are all of different forms and colours, and they are not arranged in a specific and organised manner. In this way, they contribute to a situation of neglect and disorder» (!).

⁹⁵ "Non c'è alcuna strategia. Comune da cartellino rosso", «la Nuova Venezia», 2018 dic. 2.

⁹⁶ *Brugnaro sul turismo fa come i gamberi*, «nuovavenezia.gelocal.it», 2019 apr. 25.

In sum, under point **A.**, in our judgement there has not been an adequate response to the recommendations on Tourism Pressure set out in the Mission Report (taken on by Recommendation no. 10 of Decision 40 COM.7B.52, which in turn was referenced in its entirety by Recommendation n. 4 del Decision 41 COM.7B.48):

The Mission recommends that urgent measures to manage tourism at the property should be developed and implemented, based on the consultative model of the UNESCO World Heritage and Sustainable Tourism Programme. The main objectives are:

- **To install tools for precise and differentiated statistics on tourism,**
- **To develop a comprehensive sustainable tourism strategy, and**
- **To implement efficient measures to decrease the number of tourists, especially the one-day-tourists, to a level in accordance with the City's capacity.**

In these two years of useless and damaging delay:

- a call for tenders for people-counting systems has yet to be issued;
- the comprehensive sustainable tourism strategy is very weak, as we have shown;
- efficient measures have not been taken to decrease the number of tourists, especially the day-trippers, to a level in accordance with the City's capacity – indeed, the number of tourists and tourist accommodations have increased terrifyingly.

The *Mission report* refers to the 'carrying capacity' of Venice.

According to the famous study by Jan van der Borg and Paolo Costa⁹⁷ at the University of Venice, now a point of reference, the city was already at the limits of its carrying capacity in 1998, when it had an average 20,750 tourists per day, 13,000 overnight stays and 7,750 day trippers. By 2011, however, there were an estimated 30 million tourists – meaning an average of 82,000 per day, twice the number of inhabitants⁹⁸.

According to Jan van der Borg, «The limit for tourist development in Venice, the so-called carrying capacity, was exceeded decades ago – and despite this, together with a steady increase in the number of day-trippers from 2016 to 2017, and thus more than two years since the arrival of Brugnaro [as Mayor], arrivals in the historical centre increased by 9% and [tourist] presences by 11%, a rate of increase decidedly above [the average] of European tourism. And while many other European cities are infected by the Venetian disease, including Amsterdam and Bruges, they are rapidly and radically changing their tourism strategies, preferring a reduction rather than growth and defending their city from types of visits that are not compatible with the interests of their citizens. In Venice, this growth is still celebrated as a victory. Incredible but true!»⁹⁹.

B. PROTECTING RESIDENTS

The problem had not been directly raised by the Decision 41 COM.7B.48, that doesn't talk about the inhabitants, but it was posed by the Recommendations of the 2015 Reactive Mission Report (assumed by the Recommendation n. 10 of the Decision 40 COM.7B.52, in turn assumed by the Recommendation n. 4 of Decision 41 COM.7B.48):

«Change of Use of Buildings

The Mission recommends to install efficient legal measures to discourage the purchase of flats for second residences and to change of use from ordinary habitation into any form of hotel industry (hotels, B&B, etc.) and to encourage the reconversion of B&B facilities into rented flats.

Crowding-out Inhabitants

⁹⁷ P. COSTA, J. VAN DER BORG, *Un modello lineare per la programmazione del turismo. Sulla capacità massima di accoglienza turistica del Centro Storico di Venezia*, «Coses informazioni», 32-33 (1998); *Turismo sostenibile a Venezia*, COSES, Rapporto 141.0.

⁹⁸ P. LANAPOPPI, *Caro Turista*, Venezia 2011.

⁹⁹ «Non c'è alcuna strategia. Comune da cartellino rosso», «la Nuova Venezia», 2018 dic. 2.

Based on the principles of the 2011 UNESCO Recommendation on the Historic Urban Landscape a plan for stabilising and increasing the number of inhabitants should be prepared, including measures for bettering the conditions of life for inhabitants and new housing projects».

A display called “contaveneziani”¹⁰⁰ has been installed in the window of the Campo San Bortolo pharmacy since 2006. This counter provides the number of residents, currently 52.845¹⁰¹. Next to it, a table illustrates the descending parabola: in 1951 there were 174.808 inhabitants, and therefore in the last 60 years Venice has lost 105.690 of them, 2/3 of the residents.

The *2018 Report* (p. 56) affirms: «Almost 70% of the population drop is due to the natural growth rate (difference between birth and deaths)». The table “Natural and social balances, January-July 2018” shows that the natural balance is negative: -312. The data means that Venice is a city of old people, and that young people cannot live there due to lack of homes and not touristic working activities.

The internal migration balance is negative too: -255; but the internal migration balance of the mainland is positive, respectively 225 (Fig. 56).

The *2018 Report* underestimates the issue: «Changes of residency (internal flows) indicate that, from January to July 2018, the historic city centre and the islands “lost” 225 people to the mainland ... the fact that the two parts of the Municipality are “divided” by a bridge makes it seem that it is not a true “loss”». Instead it is a true loss: these are not changes of residency within the same city but from one city to another, from Venice (a site protected by the UNESCO) to Mestre, a modern city on the mainland not included in the site but included within the same large municipality.

The sweetening of reality by the *2018 Report* continues: «The migratory rate (external flows) from the entire Municipality is positive ... Focusing on just the historic city centre, **in the first seven months of 2018 there were 601 new residency registrations while 582 residents left, a positive balance of +19 people which reverses the previous trend**» (bold is in the *Report*).

An opposition councillor comments: «It is evident not only that twice as many people die, but also that many move from Venice to the mainland... The mayor celebrates the positive balance of the 19 but ‘forgets’ of the 255 people who preferred the mainland in the first seven months»¹⁰².

In fact, reading the data we see that in Venice (even if the *2018 Report* insists on calling Venice not with its name but with the term «historic centre») the population as of December 31, 2017, is 53,799. As of July 31, 2018, the inhabitants are 53,251. In seven months the city lost 312 residents due to natural balance, 255 due to external migrations (of these, 225 have moved to the mainland) and gained 19 due to external migration balance, which in total makes 548 inhabitants lost.

We do not have official statistical data because the COSES¹⁰³ was dissolved in 2012¹⁰⁴ and therefore we use the estimates. The “Reset” movement¹⁰⁵ in October 2017 made an estimate of the citizens based not on the registration to the official registry (where those who have tax advantages but who live elsewhere, such as spouses of second-home owners, who are many, could be registered as residents), but on the lists of essential health services, used by those who reside permanently. According to Reset, out of 54,004 people enrolled in the registry office in October 2017 there would be 51,727 registered on the general practitioner's lists. Two years later, the situation should be even worse¹⁰⁶.

¹⁰⁰ Installed in 2006 by venessia.com. On the home page there is the updated data of (official) residents.

¹⁰¹ Daily updated also on the website www.venessia.com.

¹⁰² V. M(ANTENGOLI), *Dossier Unesco. Sambo: “Sui residenti i numeri sono falsati”*, «da Nuova Venezia», 2019 gen. 31.

¹⁰³ Consortium for the research and training of the Municipality of Venice and the Province of Venice, to which we owe the second study on the carrying capacity of the city, after that of the economists of the University of Venice, Costa and van der Borg.

¹⁰⁴ www.provincia.venezia.it/aziende-partecipate/coses-consorzio-la-ricerca-e-la-formazione.html

¹⁰⁵ resetvenezia.it/2017/10/23/ma-quant-i-sono-veramente-i-veneziani/

¹⁰⁶ Since October 2017, another 1159 inhabitants have moved from Venice; subtracting these transfers from the number estimated by Reset (51,727 assisted), it would appear that the estimated Venetians should be 50.568.

«The entire historic center of Venice needs a major strategic project to attract businesses and jobs, a necessary and urgent condition to bring at least 30,000 new residents to the center»¹⁰⁷. This was what Brugnaro declared during the electoral campaign. The “Gruppo25Aprile” did a search at the municipal registry to assess whether these 30,000 new residents actually arrived: «two years and a half from his [Mayor Brugnaro] settlement (and therefore halfway through his term) this is the budget: Venice had 56,072 residents on June 30, 2015; on January 1, 2018, 53.835 remained»¹⁰⁸. In two and a half years in Venice, 2,237 residents were lost. Extrapolating the figure, on average there are 74 transfers per month, 888 per year.

If we consider the whole Lagoon (which is a UNESCO site with Venice), we see that the Venetian islands (Murano, Burano, Torcello, Sant’Erasmus) and the coasts (Pellestrina and Lido of Venice) on June 30, 2015 «had 84,738 residents, by January 1, 81,827 remained. ... Balance: minus 2,911, in two and a half years. The average is 1,164 per year, or almost 100 per month. More than three per day, if you prefer».

A study carried out by a councillor of the mayor's list, president of the IX Council Commission, tries to reassess the question: based on the official water consumption of Venice, we should add to the registry office (53.076 in Venice and 27.759 in the estuary) the "Non-resident residents" (nice oxymoron!) to reach the total amount of almost 100,000 "residents"¹⁰⁹. But the city users are not citizens¹¹⁰.

According to the “Gruppo25Aprile”, the «depopulation concerns mainly the District council of Venice, Murano and Burano (in Italian called *Municipalità*), with a constant loss of one hundred residents a month in the last three years». To quantify it and understand the weight of the two components (natural balance and migratory balance), the Gruppo25Aprile carried out a search at the municipal registry office. Data as of November 2018 are, for Venice and the islands, very alarming: a parabola in descent that does not stop.

We still mention the study by Costa and van der Borg on the carrying capacity of Venice: the city was on the verge of capacity with 13,000 overnight tourists (and 7,750 excursionists) per day. And how many beds are there now? The data provided by the 2017 Tourism Yearbook (*Annuario del turismo 2017*), the most recent, are discouraging.

In 2013 in the entire Municipality the number of beds in hotels was 28,962 and those in complementary structures (b & b, tourist apartments etc.) 18,657, for a total of 47,619.

In 2017 throughout the Municipality the number of beds in hotel facilities was 30,715 but in the complementary structures they had become 32,502 (an increase of 44.2%), for a total of 63,217.

We have no more recent data, except for those of hotels, drawn up by research carried out by the Confcommercio Studies Office: in 2008 there were 387 hotels in Venice; ten years later they became 549¹¹¹ (and they will increase further).

In this last period they have opened or will open new huge "tourist containers" like the former “Catasto”, the former “Adriatica navigazione”, the former Ca’ di Dio, the former Murano glass furnaces (everything in Venice is ‘former something!’), the mega hostels of the Mestre station, the islands sold by the State and the Demanio without considering citizens. After San Clemente and Sacca Sessola, it’s time to sell the Spignon lighthouse, of the island of the Grazie, of San Secondo, of the Idroscalo, then they will sell the island of San Giacomo in Paludo and of Poveglia. A crown of

¹⁰⁷ *Visita di Brugnaro a Rialto*, «brugnarosindaco.it», 2015 May 8th.

¹⁰⁸ *Batman Brugnaro: la prova del nove, a metà mandato*, gruppo25aprile.org/tag/residenti-venezia/, 2018 feb. 10.

¹⁰⁹ *I “residenti-non residenti” a Venezia sono più del previsto: oltre 100 mila*, «veneziatoday», 2019 mar. 12.

¹¹⁰ The Gruppo 25 Aprile made a serious assessment of city users, those who have a constant relationship with the city. These are the results: "80,000 Venice residents and islands (source: Municipal registry); 20,000 university students and equivalent non-residents; 2,000 non-resident higher education students; 30,000 commuters in Venice (source: Avvm); 18,000 second home and family owners (estimate based on Imu data); Approximately 150,000 people, with the city having a "stable" ratio + 32,000 average overnight tourist numbers (source: Tourism Yearbook/*Annuario del Turismo 2017*). Total 182,000 "city users"». (gruppo25aprile.org/quanti-siamo/).

¹¹¹ E. PENDOLINI, *Solo una politica illuminata salverà il commercio in città*, «la Nova Venezia», 2019 March. 8th.

hotels in the Lagoon while the Venetians will be forever deprived of the islands, which for decades claimed to be reused for the city.

Tourism has recently literally exploded, especially with the construction of a new low-cost tourist district in Mestre, near the railway station by large foreign chains¹¹² (Fig. 58). The mayor, who inaugurated the works personally with great fanfare giving the first blow of pickaxe¹¹³ (Fig. 59), says: «The new hotels at the station are urban regeneration. People don't like them? Who cares!»¹¹⁴. Again near the station, as we have written before, the Municipal Council proposes to build two skyscrapers for receptive use. The councillor for urban planning in Venice, the surveyor De Martin, says: «The city is not saturated»¹¹⁵; the press article with his explanations is titled: *Hotel, the office of the 15 thousand beds. Other hotels in Mestre are planned next to the new M9 museum* (*Hotel, la carica dei 15 mila posti letto. Other hotels in Mestre are planned near the new museum M9*)¹¹⁶.

All these actions seem to contrast with what is stated in the paragraph **B1** (*Report*, p. 57): «With resolution no. 25 of June 15 2017 *Measures for protecting the physical, functional and social integrity of the Ancient City. Legislation amendment no. 18 to the Action Plan/General Urban Plan Amendment for the Ancient City*, the Municipal Council adopted an amendment to town planning regulations which prevents new tourist accommodation opening in the historic city centre of Venice along with the expansion of existing accommodation».

This is the famous “hotel block”¹¹⁷ resolution, hailed by the national and international press as an important intervention to protect Venice. But the international press does not know that the resolution includes very broad limitations and derogations: it does not refer to the estuary and the coast, that is to say to Murano, Burano, Torcello, Sant’Erasmo, Lido of Venice, Pellestrina and to all the former hospitals around the city, and not even to the Mainland, namely to Mestre and Marghera. In Venice itself, the resolution is not applicable to Giudecca and Tronchetto and «to the interventions included in the Implementation Urban Plans», that is to say in those areas subject to detailed plans namely Arsenale, Marittima, railway station, Piazzale Roma, former Piazza d’Armi of Santa Marta and San Basilio, former Botanical Gardens, San Pietro di Castello, Arsenale, former Actv yards, Gardens of the Biennale, former Celli building sites in Sant’Elena, Muner area¹¹⁸. It does not include even «to the interventions subject to agreements between public and private subjects and program agreements» (*Accordi fra soggetti pubblico e privati e Accordi di programma*), neither to properties included in the municipal plans of disposals (*piani comunali delle alienazioni e delle valorizzazione*), nor to the buildings owned by other public bodies. That is, the large historic buildings that could be alienated to make money are excluded. As the Budget Councillor stated, «the only sources of financing are urbanization and alienation charges. They are of crucial importance to make interventions especially on the mainland that cannot rely on the Special Law»¹¹⁹. Do we sell public buildings in Venice - which will become hotels - to finance public works in Mestre?

Davide Scano, local leader of the M5S party, calculated that in the resolution «the ban is perhaps valid for 15% of the municipal area»¹²⁰.

Apart from the limitations in the application, exceptions are always possible. We read from the resolution: «the Municipality ... can authorize ... the establishment or expansion of accommodation facilities ... where it deems the public interest», for example with regard to «the relevant economic and induced employment impact» or «to the extent of the extraordinary contribution for the

¹¹² The four major international groups are: Leonardo Hotels, 7 Days Plateno, Wombat's Hotels, Stay City Aparthotel.

¹¹³ live.comune.venezia.it, *Il sindaco inaugura i lavori per la realizzazione di nuove strutture in via Ca' Marcello a Mestre*, 2017 June 12th.

¹¹⁴ M. CHIARIN, “I nuovi alberghi alla stazione sono rigenerazione urbana”, «La nuova Venezia», 2018 Dec. 1st.

¹¹⁵ G. BERTASI, *Hotel, la carica dei 15 mila posti letto. Accordo sulla stazione di Mestre*, «Corriere del Veneto», 2018 Feb. 17th, now even on su www.pressreader.com.

¹¹⁶ *Non solo low cost: un albergo... ecco l'hotel a cinque stelle davanti all'M9*, «www.ilgazzettino.it», 2019 apr. 29.

¹¹⁷ *Report*, Annex 15_Rec. 6.

¹¹⁸ E. LORENZIN, *Cambi d'uso, non solo isole e Giudecca. Via libera a piazzale Roma e Giardini*, «Corriere del veneto», 2017 giu. 14.

¹¹⁹ *Turisti e park “salvano” la tari. “Niente nuove tasse e tagli”*, «Corriere del Veneto», 2017 Nov. 24th.

¹²⁰ G. PRADOLIN, *Cambi d'uso, la maggioranza alza il muro*, «Il Gazzettino», 2017 June 17th.

derogation». That is, if hotels create new jobs and if adequate money is paid to the Municipality, the administration can grant the derogation. The local PD party leader Andrea Ferrazzi comments: «the policy, instead of establishing equal transparent rules for all, gives itself the power to decide from time to time the exception to be granted»¹²¹.

The mayor Brugnaro replies: «The hotels bring work to Venice. Enough with complaining»¹²² and on the Tronchetto he declares: «With two hotels I can fix the whole island»¹²³. A few months before, the administration had approved in Murano «Hotels and gardens in glass factories»¹²⁴, while the unions warned: «Murano, stop at new hotels and false glass... we must stop the changes of use of the glassworks, decline of a millennial art»¹²⁵. Again a trade unionist: «The situation in Murano is increasingly alarming. Closed furnaces, “Sale” signs and a proliferation of hotel structures in the complete indifference of the Municipality and the Region, which do not seem to go in the direction of protecting a significant site such as the one in Murano ... Is this the meaning of being part of UNESCO heritage?»¹²⁶.

The most disheartening thing is that the administration reasons limiting themselves on individual areas: in Murano, Giudecca, Lido, Mestre, Marghera etc. there are not many hotels, so we can give permissions. As if the tourists who are guests of these structures came to visit Mestre and just stayed there!

And the exceptions have started to be granted in the city: the first one involved a former convent of nuns of San Giuseppe di Rivalba, in the Fondamenta degli Ormesini¹²⁷.

There are not only the limitations and the possibility of obtaining exceptions, there are also clever ways out: a hotel in San Zulian (near San Marco) has bypassed the obstacle of the resolution without having to ask for an exemption by expanding into a neighbouring condominium, a time inhabited by families; the apartments, bought at a price not «within the reach of a Venetian family», «were not formally incorporated into the hotel, because they remained apartments but to be rented to tourists»¹²⁸.

In fact, for tourist rentals nothing has changed: «We left them out because we need to study the legal aspect better», says the city planning councilor¹²⁹. Tourist leases are the most serious plague, deadly for the city, because they steal houses from the Venetians.

The houses disappear: in the last five years there have been more than a thousand changes of use destination and every two days a house becomes a hotel.

In 2013, according to the tourism yearbook 2017, in Venice the number of beds in structures complementary to hotels, and above all in apartments, was 13,433; in 2017 it became 25,301, an increase of 57%. In the last two years there has been a boom of demand: «Every day two houses become tourist accommodation: in one month 53 new activities»¹³⁰ (Fig. 60). Not to mention the squatters, from entire buildings with a private dock¹³¹ to tourist accommodation created illegally in boats (wittily nicknamed “boat & breakfast”¹³²) to the beds on balconies of Chinese illegal hosts¹³³.

¹²¹ E. T(ANTUCCI), *Blocco dei cambi d'uso, restano le deroghe*, «la Nuova Venezia», 2017 June 14th. All opposition parties agree: «Pd, Lista Casson, Misto e Cinquestelle all'attacco: “La politica non deve essere discrezionale”» (M. FULLIN, *Stop a B&B e hoteb, ok tra le polemiche*, «il Gazzettino», 2017 June 16th).

¹²² A. VITUCCI, *Brugnaro: «gli alberghi portano lavoro a Venezia. Basta con le lamentele»*, «La nuova Venezia», 2018 Dec. 4th.

¹²³ M. CHIARIN, *“I nuovi alberghi alla stazione sono rigenerazione urbana”*, «La nuova Venezia», 2018 Dec. 1st.

¹²⁴ E. TREVISAN, *«Hotel e giardini nelle fabbriche del vetro»*, «il Gazzettino», 2017 Apr. 4th.

¹²⁵ S.B., *“Murano, stop a nuovi alberghi e falsi vetri”*, «La nuova Venezia», 2017 March 7th.

¹²⁶ A. GASPARINI, *Interessi in conflitto*, «veneziatoday.it», 2018 July 18th.

¹²⁷ G. BERTASI, *Blocco degli hotel, la prima deroga. Polemiche sull'ex convento di suore*, «Corriere del Veneto», 2018 Oct. 31st.

¹²⁸ R. BRUNETTI, *Affittanza, il “trucco” per avere via libera*, «il Gazzettino», 2017 July 20th.

¹²⁹ R. BRUNETTI, *Affittanza, il “trucco” per avere via libera*, «il Gazzettino», 2017 July 20th.

¹³⁰ G. BERTASI, *Ogni giorno due case diventano alloggi turistici: in un mese 53 nuove attività*, «Corriere del Veneto», 2018 Apr. 20th.

¹³¹ *Affitti abusivi, a Venezia anche un palazzo antico: 100.000 euro al mese*, «secoloditalia.it», 2016 Aug. 20th.

¹³² M. FULLIN, *Boat & breakfast, barbe come hotel. L'ultima frontiera dell'ospitalità*, «il Gazzettino», 2019 Mar. 3rd.

¹³³ *Letti in terrazza per 10 euro a notte, chiuso b&b abusivo*, «ilgazzettino.it», 2019 Apr. 30th.

The Municipal Council seems to be worried above all about making illegal activities to emerge, since tourist leases are an important source of income for the public purse: the councillor for the Municipal Council says: «if you want to rent, do it legally»¹³⁴; he declares himself satisfied because the strict account of the evaders has given good results: «the amount of the tourist tax has practically tripled: it has gone from 217 thousand euros last year to 605 thousand this year» [2017].

It is evident that hotels and tourist locations carry a lot of money in municipal coffers.

A research by Federalberghi says that the number of houses offered as tourist rentals in Venice has doubled in a year¹³⁵. It is the Venetians themselves who prefer to go to the mainland and rent their family home, or who hasten to rent out the home of their deceased elderly relative to tourists. «Record in Venice, 73.8 tourists per resident»¹³⁶.

But, given the high profit margin, there are also real speculations: «there is someone who manages 134 housing»¹³⁷. According to Federalberghi and Ava it is not in fact «of integrative forms of income: they are economic activities in all respects, which very often refer to advertisers who manage more housing. Situation that in Venice concerns 71.02% of the portal's offers» [Airbnb]. And in 76.04% the lodgings are entire apartments, in which nobody lives. And it is not even an occasional activity: 1,809 accommodations refer to «hosts that manage more than 10 accommodations, therefore referable to “agencies”»; one host offers 135 accommodations, all in Venice, two others 98 and 90 respectively¹³⁸. A real business. The opportunity to make easy money also tickles individuals from all over the world. The Gruppo25aprile posted on the social media the photo of a shameless advertisement that appeared in a window of an agency: «Swiss notary urgently seeks in Venice in the historic center or islands an apartment with Venetian features, possibly in good condition as he wants to rent it for investment»¹³⁹. The article on «Le monde» of April, 5th, 2017 is interesting too: «Venise, pour louer tout l'année. Dans la cité des Doges, la durée toute l'année permet de rentabiliser facilement une location».

How will Venice ever be saved?

The *2018 Report* from p. 58 on p. 65 presents other minor measures to protect the Venetian residents:

B.2. Request for revision of regulations on short-lets

B.3. Limitation of take-away activities

B.4. Reorganisation of the occupation of public areas

B.5. Request for reform of the Special Law for Venice

B.6. Recycling actions and measures aimed at curbing the burden of waste generated by the presence of day trippers in the historic city centre of Venice and in the mainland to safeguard public hygiene and urban decorum

B.7. Actions to support residents

To be short, we do not comment on them in detail. Moreover, in our opinion these are minor measures, except those contemplated in paragraph **B.3** and in **B.7**, which suggest calls for public housing: in all, except errors, 6 to Giudecca, 18 in Murano, 90 + 57 in Venice and islands (*2018 Report* p. 64-65).

However, we comment on the measures provided in **B.2. Request for revision of regulations on short-lets**: «Alongside the traditional system of tourist accommodation, in recent years a new market of tourist lodgings has developed globally based on short-lets which, due to its extremely simplified character, has led to considerable changes in recent years in terms of accommodation within the Municipality, including the reduced availability of housing with traditional rental contracts for residents and the significant rise in rental prices, in addition to a strong alteration to the sector's

¹³⁴ E. LORENZIN, *Duecento denunce di b&b sospetti. Tassa di soggiorno, un milione in più*, «Corriere del Veneto», 2017 Jul. 19th.

¹³⁵ *Airbnb fuori controllo a Venezia alloggi raddoppiati in 3 anni «Basta concorrenza sleale»*, «veneziatoday.it», 2018 Sept 25.

¹³⁶ *Record Venezia, 73,8 turisti per residente*, «ilgazzettino.it», 2018 May 30th.

¹³⁷ M. FULLIN, *Airbnb, c'è chi gestisce 134 alloggi*, «il Gazzettino», 2018 set. 26.

¹³⁸ *Airbnb fuori controllo a Venezia alloggi raddoppiati in 3 anni «Basta concorrenza sleale»*, «veneziatoday.it», 2018 Sept. 25th.

¹³⁹ The photo is by Caterina Borelli.

traditional tourist accommodation systems. Accordingly, the Municipality of Venice has taken action into two directions on the one hand, invoking the government to propose a state intervention on the legal regime of short-lets and, on the other, calling on the Region to legislate on the residual aspects under its jurisdiction related to tourism».

And this because, as the *2018 Report* states on p. 6, the Municipal Council «unfortunately it has no authority over tourist rentals»: it is in fact a regional law, the n. 11 of June 14th, 2013¹⁴⁰, which has liberalized the tourist rentals.

However, what the Administration has the power to do and has not done is to prevent the change of use of the apartments, restoring the norm foreseen by the Town Plan for the historic city until 1999 (and in that year repealed), which prohibited the change of intended use of all units listed as a residence. If there were political will, in a few days it could be re-adopted, as a variation.

As the urban planner Luigi Scano claimed in 2004, «if the Regulatory Plan for the historic city had been in force at the end of 1992 ... the competent municipal offices could have rejected most of the complaints of commencement of landlord activity (or homologous)»¹⁴¹. And this is also true today.

Most of the 90,000 daily commuters (workers, students and cultural operators) would probably live in the city if availability of houses and housing market were not impractical.

If really and the city administration wanted to stop the exodus and protect the residents it should:

1. prohibit new tourist accommodations throughout the Municipality, with no limitations or exceptions;
2. reintroduce in the *Historic City Regulatory Plan* the existing standard up to 1999 that prohibited the change of use of all the units catalogued as a residence;
3. check that the b&b's follow the legislation and that they are truly a source of income integration for families and not used as tourist apartments;

Only by introducing these and other regulations (the second already existing in the past) the Municipal Council would really protect the residents.

We also comment briefly on the paragraph **B.4. Reorganisation of the occupation of public areas**. «The exponential growth of tourism in the Ancient City has led to an often-indiscriminate occupation of public areas by businesses, particularly street vendors and the outdoor areas of bars and restaurants ... Therefore, it was necessary to roll out actions to reorganise the public areas of the historic city centre, via the approval of a series of zonal planning ... Starting from 2016, no. 27 service conferences have been held to discuss actions for the reorganisation and adaptation of areas of occupation of public areas».

The problem is particularly felt by the inhabitants and the city committees. In the *campi*, (squares), the free space for the community, the meeting and the play of children (what makes the essence of Venice), is reduced, and often in the *campi* you can see the expansion of chairs (*plateatici*) to always welcome new tourists that in the traditional meeting place of Venetians eat at any time of the day. The reorganization does not seem satisfactory (for citizens): «Two new *plateatici* every month, in fields and shores where there had never been before. From the beginning of the year [2018] the Municipal Council has issued eighteen permits to as many public establishments for the occupation of public land with chairs and tables that have been added to another 650 among bars, *bacari* and restaurants with a garden in the historic center. Numbers in hand, between *calli*, *rive* and *campi*, the occupations of public land are 1,200»¹⁴². To favour the demand the Brugnaro Municipal Council extends from 210 to 300 days of duration the occupation of public land »¹⁴³; «Plateatici with a discount of 30 percent ... The city bursts, invaded by chairs and tables of more and more bars and restaurants for tourists. But the Municipal Council decides to charge less the tax on the occupancy

¹⁴⁰ Law named *Development and sustainability of the territory*.

¹⁴¹ L. SCANO, *PRG di Venezia e proliferazione di alberghi e affittacamere*, «il Gazzettino», 2004 Nov. 2nd.

¹⁴² *Due plateatici nuovi ogni mese e «spariscono» i limiti sui masegni*, «corrieredelveneto.corriere.it», 2018 Oct. 17th.

¹⁴³ E. TANTUCCI, *Plateatici provvisori tutto l'anno*, «la Nuova Venezia», 2015 dic. 15.

of public land. And precisely in the summer period, the most critical time of the year from the point of view of tourist presences»¹⁴⁴. No, we definitely prefer not to comment.

If there would be the will, the Municipal Council could intervene effectively: Legislative Decree n. 222 of 11/25/2016 introduces an innovative regulation that protects “areas or areas of particular archaeological, historical, artistic and landscape value where it is prohibited or subject to authorization ... the exercise of one or more activities ... identified with reference to the type or category of goods, as it is not compatible with the needs of protection and enhancement of cultural heritage”. Some cities, such as Florence, have already equipped themselves with a regulation that prohibits the opening of new activities and have forced to adapt within three years to the provisions in the commodity field (even in the case of takeover) those already existing.

Let's comment even the paragraph **B.5.Request for reform of the Special Law for Venice** because it concerns the now famous provision of the **landing fee** (2018 Report p. 62). «The conditions for the application of such fee ... are to be identified as landing in the city and on the islands that are part of its area. This to-be fee shall not be considered an alternative to the tourist tax ... but rather in addition to the later due to the substantially different application conditions. Indeed, the tourist tax is only incurred by a certain category of visitors who stay overnight at tourist accommodation and not by the category of day trippers coming from both the mainland and the lagoon... Such action would entail a suitable solution to the specific characteristics of the area, favouring the planning and management of the mass tourism phenomena in the City of Venice».

In November 2017 the Municipal Council requested to the Italian government legislative intervention in order to introduce a specific measure to the Special Law for Venice, enabling... the application of a landing fee for everyone entering the city. Instead, the provision was included in the state budget law (Article 1, paragraph 1129) that says: «The Municipality of Venice is authorized to apply, for access, with any carrier, to the Ancient City and to the other smaller islands of the lagoon...».

From the landing fee the Municipal Council expected a revenue of 10 million, of which most would have gone to reduce the *Tari*, the tax on waste, by 2.7%¹⁴⁵, tax that the same administration had increased in 2017 by 5.5%¹⁴⁶. «Each resident is in charge of the waste of two other “equivalent inhabitants”: tourists, students, commuters (up to 120 thousand on peak days), who transform a city of not even 54 thousand people into one that produces garbage even for 170 thousand ... This explains the almost 54 thousand tons of waste collected in 2016 between calli and campi of Venice, Murano and Burano: 870 kilos for each of the "real" resident in the city. A huge quantity! ... very far from the 456 kg per head of the average of Venetians»¹⁴⁷. From the landing fee would come the money to reduce the very expensive waste tax that the Venetian will pay to dispose of tourist waste. A contradiction: if we reduce the number of tourists, it is obvious that the tax will also decrease.

Many comments have been to this resolution. The most important: it is used only for making money and not to slow down or reduce tourist flows, given the small amount (probably less than 10 euros or even less); moreover, it is the demeaning awareness that living in Venice by now means living in a theme park, with an entrance ticket: «it may not be the last nail on the coffin of Venice... but ... it still has an important symbolic meaning: to enter the historic city you will pay a ticket»¹⁴⁸.

Difficulties of any kind are looming, from the number of carriers that would be involved, to the places of landings (those arriving by plane should not pay, since the airport is located on the mainland), etc. etc. Given the complexity of this heavy tax (and the many exceptions that the Venetians had fun imagining), the introduction of the shipping fee sled in September¹⁴⁹ (and who knows if it will ever be introduced).

¹⁴⁴ A. VITUCCI, *Plateatici con lo sconto del 30 per cento*, «la Nuova Venezia», 2018 Apr. 6th.

¹⁴⁵ F. BOTTAZZO, *Ventitré milioni in tre anni dal ticket*, «Corriere del Veneto», 2019 Mar. 3rd.

¹⁴⁶ *Stangata sulla Tari, aumento del 5%*, «nuovavenezia.geolocal.it», 2016 Nov. 28th.

¹⁴⁷ R. DE ROSSI, *Rifiuti, a Venezia in 54 mila pagano per 170 mila*, «la Nuova Venezia», 2018 Mar. 27th.

¹⁴⁸ F. GNECH, *Una modesta proposta per Venezia*, glistatigenerali.com.

¹⁴⁹ M. FULLIN, *Il ticket di accesso slitta a settembre*, «il Gazzettino», 2019 Mar. 3rd.

Italia Nostra cannot disagree with the Minister Centinaio who claims that the landing fee «does not help solve the problems of overcrowding that the city experiences» but «only to make cash ... Let's put a limited number without the tourists who enter to Venice having to pay. Let's decide that the city can accommodate a maximum number of tourists per day»¹⁵⁰. But noone talks about limited number, at all.

We do not comment on the final points of the **new sustainable tourism strategy** of the Municipal Council because in our opinion they are not very relevant for the purpose of containing tourism:

C. Balancing extra costs to promote the improvement and development of the city

D. Innovating communication and marketing. Educating towards responsible and sustainable tourism.

However, we would like to conclude by mentioning the Venice 2016-2018 *Destination Management Plan*¹⁵¹ (*DMP*), of the Veneto Region, a document that concerns the strategic lines on tourism in the whole region, and therefore of the 562 municipalities that are behind Venice: we remind that it was the *Regione Veneto* that promulgated the law (n. 11 of June, 14th, 2013) which liberalized the tourist rentals¹⁵².

First of all, the *DMP* is said to have been written «with the contribution» of many trade associations, such as ABBAV (Veneto Bed and Breakfast, guest house and tourist apartments). Among its objectives (pp. 49-50) it has: «Creation of events even in periods of low season to enhance the charm of the city all year round»; «Support for tourist activities aimed at enhancing the lagoon ... for the realization of innovative tourism projects in the lagoon area»; «Promoting the spread of tourism in the mainland»; «Development and development of the Marco Polo airport».

The entire Plan is focused on the increase of tourism in the Lagoon and in the mainland: «Identification brand (Venice) already positioned on international markets and with a strong identity. Venice is and remains one of the places to be seen at least once in your life» (*DMP*, p. 43).

In conclusion, based on the information we have provided above, we contend that Decision 41 COM.7B.48, Recommendation no. 3 has not been fully observed: an effective, «sustainable tourism strategy» has not been prepared

¹⁵⁰G. DE POLO, «Il ticket serve solo a spennare I turisti. Si al numero chiuso senza pagare», «la Nuova Venezia», 2019 Mar. 3rd.

¹⁵¹ www.regione.veneto.it/web/turismo/dmp

¹⁵² Law named *Development and sustainability of the territory*.

DECISION 41 COM.7B.48, RECOMMENDATION NO. 7

«Also notes that the State Party is exploring an option of using existing port channel (Canale Vittorio Emanuele III) with a view to halt the passage of large ships through the San Marco basin and the Giudecca canal, and to avoid the excavation of new ones and requests the State Party to submit detailed plans and a detailed timeframe for the implementation of the selected solution».

The *2018 Report* quotes the last meeting of the Interministerial Steering, Coordination, and Control Committee for the Safeguard of Venice» (called the *Comitatone*), which took place on 7 November 2017.

It should preliminarily be clarified that:

1. The *2018 Report* does not quote the document voted by the *Comitatone* on November 7, 2017¹⁵³, but only «The approved minutes».
2. Anyway, the Document voted by the *Comitatone* is NOT a real decision since the most important institutional members were absent, as the prime Minister, who acts as President, the minister for Cultural activities (present only in the first part of the meeting), the Minister for Environment, the Minister for the Universities and Scientific Research. A possible decision would therefore not have had legal value;
3. The Document voted by the *Comitatone* does not contain ANY REAL DECISION on cruise ships. It only states that «the Committee **invites** the concerned Authorities to verify and evaluate the concrete feasibility of the above mentioned itinerary», that is, the hypothesis Marghera-Northern Canal, the feasibility of excavating the Vittorio Emanuele III channel, the feasibility of a decree by the *Capitaneria* (Harbour Master's Office) about keeping the limitation to 96.000.000 tons, and to examine the possibility of revising the Clini-Passera decree.

The Document voted by the *Comitatone* is not a decision but only an 'invitation'!

There was no decision because no decision without contradiction was possible: as we shall show, keeping a Lagoon itinerary for large ships and preserving it is absolutely nonsense.

To the recommendation no. 7 the *2018 Report* replies in two points: **«1. Actions aimed at the resolution of the navigation route of Large Ships»; «2. New cruise terminal».**

1. Actions aimed at the resolution of the navigation route of Large Ships

The *2018 Report* at page 82, without quoting the document voted by the *Comitatone*, states: «As set down in the approved minutes, the Committee “identifies Marghera Nord, the landing place reached via the Malamocco Channel, as the best solution in terms of the safety of navigation, lead times, costs, administrative sustainability as well as being the option most consistent with the strategies for the planning and management of the maritime domain that Law no. 84 of 1994 assigns to the Port System Authority”».

At page 83 the *2018 Report* does again not quote the document voted by the *Comitatone*, but the approved minutes: «The proposed approach ... intends to provide a definitive and lasting solution that will overcome the problem of the passage of large ships to the San Marco Basin and Giudecca Canal».

It is useful to recall that in these five last years there was a lot of “definitive and lasting solutions” put forward by the last two governments, who decided:

1. to approve the excavation of the Contorta Channel, which was incredibly defined by the previous President of the Port Authority «a work of environmental restoration»¹⁵⁴! During the Environmental Impact Assessment (EIA, VIA in Italian) procedure for this project, a flood of technical observations were sent, including five by Italia Nostra. Taking into account these observations, the Port Authority let the decree drop;

¹⁵³ With the contrary vote of the Mayor of Chioggia.

¹⁵⁴ A. VITUCCI, “*Il Contorta, una grande opera per il riequilibrio della Laguna*”, «da nuova Venezia», 2013 ott. 8.

2. After that, the government endorsed the proposal of the Mayor of Venice Brugnaro to dredge a new channel, Tresse Nuovo. This plan, though never presented to the public, is inserted in the Patto per Venezia (Pact for Venice) signed in December 2016 and also in the 2017 *Report* delivered to UNESCO;
3. a few months later, to renounce this solution, opting instead to move the Maritime Terminal to Marghera, for larger ships, and to enlarge the existing Vittorio Emanuele Channel, to enable some smaller ships to reach the Venice Maritime Station;
4. The current government has instead dismissed this trend by the Comitato and the new Minister for Infrastructures requested to better study three other projects, which also appear unfeasible.

EVALUATION BY ITALIA NOSTRA OF THE IMPACT OF THE SOLUTION CONSIDERED BY THE COMITATONE (MARGHERA AND VITTORIO EMANUELE CHANNEL)

For the above evaluation, it is useful to recall some data on:

- a. the Lagoon
- b. the Malamocco-Marghera Channel (*Canale dei Petroli*);
- c. which actions would be necessary for preserving the Lagoon;
- d. the itineraries of the large ships (cruise, commercial and ro-ro ships) inside the Lagoon;
- e. which itineraries the 2017 Comitato asks to investigate;
- f. which ones are the weak points of the Vittorio Emanuele III channel;
- g. which ones are the weak points of the Malamocco-Marghera Channel;
- h. which ones are the weak points of the decree by the *Capitaneria* (Harbour Master's Office) on the bases of a Multicriteria Analysis carried out by the Port Authority;
- i. the water pollution and the Blue flag agreement

a. The Lagoon

It is useful to recall what the Lagoon is, in order to understand why there will never exist the possibility of very big passenger or merchandise ships in it, different from the one foreseen by the 2015 Reactive Monitoring mission and by the Decision 40 COM 7B.52, Recommendation no.6.

Those who don't know the Lagoon and its multifaceted beauty are liable to think of it as an undifferentiated stretch of water, out of which various famous islands of a certain touristic charm have arisen in some singular and strange fashion. But if we examine one of the many splendid Lagoon maps commissioned by the *Savi ed esecutori alle acque*¹⁵⁵, or if we have the opportunity to overfly some of the still intact areas of the Lagoon basin, what we see is a variegated arabesque of colours, light and dark blues, greens and browns: these are canals in their various articulations and depths, and patches of land emergent in their differing degrees. This is the Lagoon, in precarious equilibrium between horizons of sea and land: not a stretch of water then, but land and water intermingled.

From the three inlets from the open sea (Lido, Malamocco and Chioggia) strong and winding channels branch inwards in ever narrower rivulets as far as the *ghebi* (tidal creeks) over which, even at high tide, only the light, flat-bottomed *sandali*, designed for the purpose by our forefathers, are able to slip. These canals channel the tide ensuring a constant change of waters, washing over and through vast areas of submerged land, shallows and marsh flats more or less at water level, salt marshes barely above it, and clearly emergent islands, inhabited or otherwise. Blues indicating waters

¹⁵⁵ The water magistracy, that is the authority established by the Venetian Republic in the modern period to oversee the Lagoon.

of various depths, browns signalling land of differing height: an ‘ecomosaic’¹⁵⁶, not a simple, passive bowl of water but an active canal-riven environment with specific functions and precise dynamics¹⁵⁷; It is also a complex historical, cultural environmental mosaics, which was studied in all its aspects in hundreds of scientific publications.

Arriving in Venice on an airplane, one can observe very peculiar “lands” roughly at sea level, which make the Venice Lagoon be a Lagoon and not a trivial and deep marine bay. They are the *barene* (salt marches), which make the Venice Lagoon different from a trivial sea bay. They have their typical canals and small canals and ponds, which are typical of lagoons, and in particular of the Venice Lagoon. They have been formed during the 6.000 years of life of the Venice Lagoon.

Given their general status of between 20 and 25 cm above mean sea level (mSl), rising to +45 along the perimeters and canal edges, they are subject to cyclical total submersion during the spring tides coinciding with full or new moons, which can reach +60/+65 cm: in these periods the vegetation captures the sediment and organic detritus carried by the current. Thanks to their ability to mutate, their height above mean sea level has remained constant «through compression where the surrounding sea level falls, through sedimentation where it rises»¹⁵⁸. This extraordinary characteristic would be enough for ensuring its protection!

«Even where largely emergent, these formations form the true seabed of the Lagoon». The salt marshes have a very important role: they dissipate the force of the currents, protecting the areas permanently above sea level. Together with the shallows and marsh flats, the canals and the tidal creeks, the salt marshes form part of the system of interdependent functions that is the Lagoon. Without this complex synergy it would be a different thing. The very first of the *leggi speciali* (no. 171/1973) envisaged «the preservation of the physical and ecological unity of the Lagoon, the preservation of the salt marshes and an embargo on further land reclamation», the second (no. 798/1984) «the restoration of [the Lagoon’s] environmental equilibrium», and the third (no. 139/1992) called for the «recovery of the Lagoon’s original morphology” and “a halt to [it’s] deterioration».

The *barene* are elements of a complex context, which has well defined ecological and hydraulic functions and which defines the Venice Lagoon. Each morphological unit, according to its level and function has a different venetian name, such as: *barena* (salt marsh), *velma* (intertidal mud flat), *bassofondo* (shallow mudflat), *chiaro* (salt pan), *ghebo* (tidal creek), *canale* (channel). A very old lagunar culture.

On the web a wonderful picture by Yann Arthus Bertrand¹⁵⁹ can be seen, which gives an idea of this morphological complexity (see also Figs. 61-63).

We can read in Criterion 5 for the admission of Venice and its Lagoon in the UNESCO heritage list inscription: «In the Mediterranean area, the Lagoon of Venice represents an outstanding example of a semi-lacustral habitat which has become vulnerable as a result of irreversible natural and climate changes. In this coherent ecosystem where the muddy shelves (alternately above and below water level) are as important as the islands, pile-dwellings, fishing villages and rice-fields need to be protected no less than the palazzi and churches»¹⁶⁰.

WHC e UNESCO stated that «In this coherent ecosystem ... the muddy shelves ... need to be protected no less than the palazzi and churches» since they are a part of the history of Venice. In the Lagoon, among the *barene* was built the city that we all love, as it is said in the medieval documents.

If the *barene* would disappear, if the Lagoon with its peculiar characteristics would disappear, Venice would remain Venice only for the large ships passengers and superficial short time visitors.

¹⁵⁶ This definition is due to the ministerial Committee (EIA VIA) which disapproved Mose (*La valutazione di impatto ambientale relativa agli Interventi alle bocche lagunari per la regolazione dei flussi di marea. Studio di impatto ambientale del progetto di massima*, Part iv, *Il sistema ambientale di riferimento e gli impatti*, p. 3, online on the Comune di Venezia website).

¹⁵⁷ L. BONOMETTO, *Il crepuscolo della laguna*, in *La laguna di Venezia. Ambiente, naturalità, uomo*, Portogruaro 2007, p. 181-243, online (www.politicheambientali.provincia.venezia.it) pubblicazioni).

¹⁵⁸ L. BONOMETTO, *Ecologia applicata e ripristino ambientale nella laguna di Venezia: analisi e classificazione funzionale delle “barene” e delle tipologie di intervento sulle barene*, Venezia 2003.

¹⁵⁹ yannarthusbertrand2.org/index.php?option=com_datagallery&Itemid=27&func=detail&catid=50&id=1412&l=1680.

¹⁶⁰ <https://whc.unesco.org/en/list/394>.

This is the Venice Lagoon, or at least it was: an environment which forms an unity with the city, which the Venetians have lived and known, as Tiepolo, Casanova, Turner (and partially also our grand fathers) did, but which is disappearing.

The total surface area of the *barena*, estimated to have been 255 sq.km. in the seventeenth century, had already shrunk by 1901 to roughly 170 sq.km. But it is in the last half century that the phenomenon has gathered momentum: the surface area in 2003 was barely 47 sq.km¹⁶¹.

Why are *barena*s disappearing? Among the reasons, there obviously is subsidence and eustatism, but if these would be the only reasons, there would not be any *barena* left in the whole Lagoon.

Although today we look on them as a resource, in past centuries the salt marshes were considered a disaster, threatening ruin for the Serenissima. It is well established that lagoons evolve, tending towards silting into marshland, or, in the opposite direction, towards absorption into the sea. Five hundred years ago the Lagoon was at risk of disappearing completely, gradually filling up with river silt. From early in the fourteenth century works were initiated to divert all the river-mouths outside the Lagoon, and from the mid sixteenth century the results of this superhuman effort begin to be seen: marsh flats, salt marshes and mounds of river deposits start to disappear underwater, while the Lagoon channels become deeper. The reduction, followed by the elimination, of river sediment was depriving the marshlands of their nourishment.

Since then, albeit gradually, the trend has been reversed. The Lagoon as conceived and shaped by the government of the Republic has succeeded in maintaining its essential morphological and hydrodynamic characteristics since the beginning of the nineteenth century: at that time large areas of the Lagoon basin would still emerge from the waters at low tide¹⁶² (Figs. 64-65).

By the end of the century, though, new and powerful technologies were available for the carrying out of major works liable to profoundly affect the dynamics of the Lagoon. New transit imperatives were leading to a growth in the dynamism of both port and Lagoon. Channelling jetties are built at the inlets, encouraging erosion of the seabed to enable the passage of larger vessels. None the less over two centuries ships' draught and tonnage continue to increase: the inlets are dredged further, and deep new canals excavated, the Vittorio Emanuele III canal in 1920-25 and, midway through the 1960s the Malamocco-Marghera Channel, more generally known as *Canale dei Petroli* (Oil Channel, as chiefly serving the oil industry at Marghera).

b. The Malamocco-Marghera Channel (*Canale dei Petroli*)

A controversial project from the outset, it has been responsible for destabilising the hydromorphology of the entire central Lagoon, according to researches of the Hydraulic department of the University of Padua, of the University Ca' Foscari of Venice, of the Italian National Research Council (CNR-ISMAR). These Institutions, together with various International Scientific Institutions found the origin of the erosion of Central Lagoon in the Malamocco-Marghera Channel (and in the ships navigating in it)¹⁶³.

¹⁶¹ L. D'ALPAOS, *Conoscere il comportamento idrodinamico della laguna del passato per progettare la laguna del futuro*, «Atti dell'Istituto veneto di scienze, lettere ed arti. Classe di scienze fisiche, matematiche e naturali», 162 (2003-04), p. 386.

¹⁶² L. D'ALPAOS, *Fatti e misfatti di idraulica lagunare. La laguna di Venezia dalla diversione dei fiumi alle nuove opere alle bocche di porto*, Venezia 2010, p. 232 (www.ivsla.it).

¹⁶³ J. RAPAGLIA ET AL., *Shipping-induced sediment resuspension in the Venice Lagoon, Italy*, «Rapp. Comm. int. Mer Médit.», 39 (2010), p. 790; J. RAPAGLIA ET AL., *Characteristics of ships' depression waves and associated sediment resuspension in Venice Lagoon, Italy*, «Journal of Marine Systems», 85, 1-2 (2011), pp. 45-56; M. GELINAS, *Industrial ships' wake propagation and associated sediment resuspension in the Venice Lagoon*, tesi di laurea discussa presso la Stony Brook University, 2011; M. GELINAS ET AL., *Sediment Resuspension by Ship Wakes in the Venice Lagoon*, «Journal of Coastal Research», 29-1 (2013), pp. 8-17; G.M. SCARPA, *Caratteristiche dell'onda di depressione generate dal traffico navale e risospensione dei sedimenti in un canale navigabile confinato. Il caso del canale Malamocco-Marghera*, tesi di laurea discussa presso l'Università degli studi di Ca' Foscari, a.a. 2013-14; M. GIONTA, *Effetti morfologici del traffico navale nelle aree lagunari prossime al canale Malamocco-Marghera*, tesi laurea Università degli Studi di Venezia, Ca' Foscari, a.a. 2013-14; K.E. PARNELL et al., *Ship-induced solitary Riemann waves of depression in Venice Lagoon*, «Physics Letters A», 379/6, (2015), pp. 555-559; J. RAPAGLIA et al., *Ship-wake induced sediment remobilization: Effects and proposed management strategies for the Venice Lagoon*, «Ocean & Coastal Management», 110 (2015), pp. 1-11; *Attività 3 e 4 - Valutazione degli effetti del moto ondoso da natanti e analisi idro-ecologica. Relazione finale, Giugno 2016*, in *Stato ambientale della Laguna di Venezia ed elementi per la pianificazione sostenibile delle attività portuali* (ISMAR-CNR, INSEAN-CNR); L. ZAGGIA et al., *Fast shoreline erosion induced by ship wakes in a coastal lagoon: Field evidence and remote sensing analysis*, «Plos One», 12/10, 2017; P. TEATINI et al., *Digging navigable waterways through lagoon tidal flats: which short and long-term impacts on groundwater dynamics and quality?*, «Geophysical Research», 19 (2017);

These studies prove that each ship going through a bordered passage (as the Malamocco-Marghera Channel) create a depression wave (the Bernoulli wake) which is followed by a rapid coming back of water. The wave breaks against the adjacent shoals and erodes them. Sediments go back to water ; those with larger size deposit in the network of natural canals (which tend to disappear) and in the artificial Malamocco-Marghera Channel, which therefore needs to be periodically escavated. The smaller particles are transported into the sea and remain there, creating a deepening of the Lagoon (Fig. 66).

Here the late nineteenth century modifications to the sea inlets, with their channelling jetties, have their say: during the ebb-tide the accumulated sediment is carried too far out to sea to be carried back in on the ensuing flood tide¹⁶⁴.

The overall loss of light sediment, silt and clay (eroded by the wash from boats and by other factors, as the wind or clam fishing), is difficult to quantify, but is likely to fall between four or five hundred thousand and a million cubic metres annually¹⁶⁵.

The straight form of the Malamocco-Marghera Channel facilitates also the propagation of the tidal wave: the incoming tide no longer ramifies along the natural canal beds but spreads by 'lamination', expanding over the surface of the shallows. Therefore the natural canal beds atrophy as a consequence (Fig. 67).

These processes (atrophying of the natural canals, erosion of the saltmarshes and shallows) have made the central part of the Lagoon a deep crater. Its existence has had "a devastating impact on the hydrodynamic circulation of the Central Lagoon and on the evolution of its morphology"¹⁶⁶. The Lagoon loses its morphological characteristics, and becomes a deep marine bay.

The current erosion speed, according to the studies of Professor D'Alpaos and of the Department of Hydraulics of Padova University, originates pessimistic forecasts: the average depth of the Lagoon bottom, which was less than 50 cm at the beginning of the 20th century, has become 1,5 meters in 2003 and tends to become 2.0-2.5 meters in the middle of this century¹⁶⁷.

A new study¹⁶⁸ by CNR on the erosion induced by Malamocco-Marghera Channel states:

«Besides the specific problem of Venice and its port, understanding the effects of navigation in confined channels surrounded by shallow water areas may be of help in addressing technical solutions for similar situations worldwide, improving criteria for environmental decision making and sustainable management of ecosystem services». «The proposal to reroute cruise ships from the Lido inlet to the MMC will avoid the historic center of Venice, but will increase the number of large ships in transit in the MMC [Malamocco-Marghera Channel] with S almost twice that of cargo ships currently using the channel. It is likely that implementation of this solution will result in higher impacts to the lagoon areas in the vicinity of the channel and rise maintenance costs». «Depression wakes are normally generated by displacement type vessels, and their amplitude increases with an increase in the blocking coefficient [*coefficiente di finezza*] (S , which is the ratio of the product of ship width and draught to the cross-sectional area of the channel), and ship velocity, usually expressed as the depth-based Froude number (Fr)». «The design and management of waterways in shallow water coastal systems is undoubtedly a challenge. Besides other environmental impacts, the effects of ship traffic can significantly affect the morphology of the channel margins and the surrounding shallow

P. TEATINI et al., *Hydrogeological effects of dredging navigable canals through lagoon shallows. A case study in Venice*, «Hydrology Earth System Science. Discussions», 2017. In general: M. LARSON, *Sediment movement induced by ship-generated waves in restricted waterways*, «Coastal Dynamics», 2017, pp. 300-311.

¹⁶⁴ D'ALPAOS, *Fatti e misfatti di idraulica lagunare*, (www.ivsla.it).

¹⁶⁵ 4-500 thousand according to D'Alpaos (*Fatti e misfatti di idraulica lagunare*, p. 256), 700.000 according to the Consorzio Venezia Nuova (www.salve.it), 800.000 for Sarretta (SARRETTA ET AL., *Sediment budget in the Lagoon of Venice, Italy*, «Continental Shelf Research», 30, 2010, p. 934-949), 1 million for the Ufficio di Piano (*La gestione dei sedimenti contaminati nella Laguna di Venezia*, on line).

¹⁶⁶ L. D'ALPAOS, *L'evoluzione morfologica della laguna di Venezia dal tempo del Dénaix ad oggi e sue conseguenze sul regime idrodinamico*, in *Conferenza lagunare. Storia, ingegneria, politica e diritto nella laguna di Venezia*, proceedings of the Bicentenario della Conferenza Lagunare conference, Venice, 14-16 Mar. 1991, Venezia 1992, p. 73.

¹⁶⁷ L. D'ALPAOS, *L'evoluzione morfologica*, p. 85.

¹⁶⁸ L. ZAGGIA, G. LORENZETTI, G. MANFÉ, G.M. Scarpa GM, E. Molinaroli E, K.E. Parnell, et al., *Fast shoreline erosion induced by ship wakes in a coastal lagoon. Field evidence and remote sensing analysis*, «PLoS ONE», 2017, p. 2, 3, 13.

water areas, as shown by this case study. From the results of our investigation it follows that a few decades of traffic in the Venice Lagoon caused extensive shoreline retreat along the waterway. The maximum recession over four decades is ~160 m and regression rates up to 4 m/y. The total volume lost from the studied system is 1.19×10^6 m³ corresponding to 3.0×10^4 m³/y most of which consists of protected areas for the conservation of fauna. The progressive erosion of the channel margins and of the adjacent mudflats determines the accumulation of the mobilized sediments on the channel bottom, increasing the frequency and cost of maintenance dredging. However, the economic implications of the erosion are not the only undesirable effect. Firstly, in the long term, the process can be responsible for a significant proportion of the total loss of habitat observed in the Central Lagoon basin with consequences on ecosystem services. Secondly the progressive deepening of the Central Lagoon basin also has consequences on the general hydrodynamics of the Lagoon, increasing its vulnerability to the effects of storm waves and exceptional high tides. Finally, the continuous sediment mobilization and re-aeration can mobilize contaminants into the water column, with potentially harmful effects on the whole lagoon ecosystem».

c. Actions to preserve the Lagoon

Therefore, to preserve the Lagoon, the Malamocco-Marghera Channel should be revised. A reduction in the depth of it was already called for in the *Piano Generale degli Interventi* (1991), also in the *Piano Morfologico della Laguna del Magistrato alle Acque* (1993) and again unanimously confirmed by the *Commissione per la Salvaguardia di Venezia* (2003). A «reappraisal of the assumed precedence of the Canale dei Petroli [Malamocco-Marghera Channel]» and a reduction of 12/13m in the depth of the first section.

But nothing was done.

d. Paths of the big ships (cruise, commercial and ro-ro ships) in the Lagoon (see the map in Fig. 68)

The cruise ships currently come inside the Venice Lagoon through the Lido entrance, go through the Saint Marc Channel, the Bacino, and the Giudecca channel for landing at the Venice Maritime station, in the center of the city, at Santa Marta, a part of Venice which is full of habitants and students.

The commercial ships go through the Malamocco entrance, then the whole Malamocco-Marghera Channel and finally arrive at the industrial site of Marghera.

The ro-ro ships follow the same path from the sea, but land at Fusina, at a special terminal built in 2014 in order the cruise ships to use the Venice Maritime Station in Venice itself.

e. Paths which the Comitatore 2017 asks to be investigated (These hypothesis only concern the cruise ships)

The large cruise ships, above 130.000 tons, should go through the Malamocco entrance and then follow the already described Malamocco-Marghera Channel until the end, the industrial pole of Marghera, following the same path as commercial ships and land to the Channel North, northern side (this was explicitly requested by Mayor Brugnaro). Smaller ships would also follow the Malamocco-Marghera Channel, but in Marghera would enter the Vittorio Emanuele channel, finally arriving at the current Venice Maritime Station in Venice itself.

Ships within 40.000 tons would continue entering, as they currently do, through the Lido entrance and go through the San Marco Channel and the Giudecca Channel until the Venice Maritime station.

The *2018 Report* (at page 82) explains the positive outcomes of the “solution” Marghera and Vittorio Emanuele channel, which the previous government intended to study and the current Minister for Infrastructures decided to disregard:

«The route outlined would make it possible to achieve the following key objectives:

- Halting the passage of big ships through the San Marco Basin;
- Safeguarding the Maritime Station as a cruise ship home port and therefore Venice’s world-class reputation as a cruise destination;
- Safeguarding the efficiency of the commercial and industrial port in Marghera by separating goods and passenger traffic;

- Identifying a solution with a minimal impact upon the lagoon»

One can object that:

- The matter is not to stop big ships going through the San Marco Basin, but to prevent them to enter the Lagoon, as mentioned in the 2015 Reactive Monitoring mission;
- it is not true that it safeguard the efficiency of the commercial and industrial port in Marghera, since, on the contrary, good and passenger traffic would follow the same itinerary through the Malamocco-Marghera Channel;
- Safeguarding the Maritime Station as a cruise ship home port and therefore Venice's world-class reputation as a cruise destination; it may be safeguarded also in other ways, as we already proposed to Prime Minister Gentiloni, and shall further explain;
- It is untrue that this solution would have a minimal impact on the Lagoon; on the contrary, the impact would be enormous.

In paragraph «2. New cruise terminal» the *2018 Report* (pp. 85-86) describes the Marghera terminal as contributing to the vitalisation of the industrial area: «The area will be provided with efficient road links connecting it to the main transport nodes. The project involves the construction of a passenger terminal with a 800-metre-long quay and will repurpose a decommissioned industrial site in a state of abandonment and environmental degradation, thereby favouring urban regeneration».

f. Critical points of the Vittorio Emanuele III Channel

According to the *2018 Report* (p. 82), «The project will involve refunctioning of the existing Vittorio Emanuele III channel joining the Malamocco-Marghera channel to the Venice Maritime Station», but, as we saw, any major, artificial channel in the Lagoon will become filled with sediment if not maintained, since the ship passages change the Lagoon hydrodynamics. The related traffic generates waves that erode the bottom of the Lagoon, whose sediments end up in the canal itself.

The Vittorio Emanuele channel is an old, artificial channel. It is not large enough for the dimensions of current cruise ships, and it has been semi-abandoned: at present it is 20 meters large and 4-5 meters deep.

Professor Gianni Fabbri, of IUAV University, in Venice, studied the characteristics of a new Channel with important traffic (on the bases of the Contorta Channel project): depth 10.50 meters, overall width 120 meters 10,40 meters. Since cruise ships move about 100,000 cubic meters of water, to avoid destruction of the Lagoon, any channel should be bordered by large stone to be put about 40 meters from the canal edge: «from a border to the other, such canal would be 200 meters large»¹⁶⁹. As the Port Authority states, it would be necessary to dredge about two million cubic metres of sediment¹⁷⁰ that for the most part are toxic.

Dredging millions of cubic metres of sediment contaminated with toxic pollution is not allowed under the Special Laws for Venice, nor by the *Area Plan for the Lagoon and Venice* (PALAV), and moreover it is not allowed by the *EU Water Framework Directive* (which restricts dredging of sediment and in particular toxic sediments, to not spread and increase pollution). As we noted early, Italy has yet to treat the sediment dredged to deepen the Malamocco-Marghera Channel in 2004-2013, and as a result pays high fines to the EU every six months;

The excavation of the new Vittorio Emanuele channel would worsen the problems of oxygen depletion in the stretch of the Lagoon between the Vittorio Emanuele Channel and the bridge to Venice: anoxic events have occurred in the Lagoon – during 2017 summer time all Venetian households could smell the miasma when they awoke – and the project for the Vittorio Emanuele Channel would increase their occurrence.

g. Critical aspects of the Malamocco-Marghera Channel.

This canal, as mentioned above, has led to the erosion and decay of the Central Lagoon. Since 1969, all commercial ships pass through it, since 2014 also Ro-Ro ships, which stop al Fusina, before Marghera.

¹⁶⁹ G. FABBRI, *Grandi navi alla Marittima, un enorme taglio alla laguna*, «la Nuova Venezia», 2018 feb. 5, G. FABBRI, *Grandi navi, il Vittorio Emanuele non è la soluzione giusta*, «la Nuova Venezia», 2015 set. 28.

¹⁷⁰ Autorità di Sistema Portuale del mare Adriatico settentrionale, *Piano operativo triennale 2018-2020*, p. 103.

The Ro/Ro traffic had an increase of 35%¹⁷¹ in 2018 and the new terminal will be able to host 1200 ships a year, which means 2,400 passages through the Malamocco-Marghera Channel.

Again in 2018, the commercial ships did 3,593 calls, that is, 7,186 passages.

The cruise ships passing through the saint Marc basin were 502.

Letting the cruise ships arrive in Marghera would mean to add to the 7.186 passages of commercial ships ant to the 2400 of Ro-Ro ships also 1004 passages of cruise ships. A total of 10,088 passages, an average of 27.6 a day. Foolish!

For meeting this traffic increase, the moving of the cruise terminal to Marghera (with or without its continuation through the enlarged Vittorio Emanuele channel) would oblige to enlarge the Malamocco-Marghera Channel and to reinforce it with rigid structures.

Professor Fabbri also made for the Malamocco-Marghera Channel the same simulation made for the Vittorio Emanuele channel (on the bases of the Contorta Channel project)¹⁷²: he concluded that the passage of cruise ships through the Malamocco-Marghera Channel and the Vittorio Emanuele channel would oblige excavations of 6 to 7 millions cubic meters of sediments. According to the The Comitato Nogradinavi this amount is equivalent to a cube with almost 200 meters on each side (Fig. 69) or to a St Mark's bell tower 48,611 metres high (Fig. 69 bis)

A final problem, difficult to be solved would be the stocking of the excavated material.

As we saw, the *Protocollo fanghi* of 1993 classifies the muds of Venice Lagoon into 4 classes of risk; only muds of A category may remain in contact with the water.

For the stocking of the material excavated between 2004 and 2012 from the Malamocco-Marghera Channel, the government needed to establish an Authority, with powers which were more important than usual urban planning laws, the as the Malamocco-Marghera Channel was filling with sediment (due to the fact that it is not compatible with the Lagoon's dynamics),

Between 2004 and 2012 27 million cubic meters of sediments were excavated (as the Malamocco-Marghera Channel was filling with sediment due to the fact that it is not compatible with the Lagoon's dynamics), out of which only 553,500 cubic meters could be used for the morphological reconstruction of the Lagoon, and remaining 6,545.968 cubic meters had to be put in the artificial Island of Tresse, for pollution reasons and danger in case of contact with the Lagoon water.

The percentage is probably similar now, because it is believed that the Vittorio Emanuele channel is also contaminated.

If the new path for megaships will follow the itinerary Malamocco-Marghera Channel - Vittorio Emanuele, where will be put the 6-7 millions of cubic meters of mud coming from the needed excavation of the new path? Will the institution of a new authority be needed, who may act outside existing laws?

The Interregional Office for Public Works (*Provveditorato Interregionale per le Opere Pubbliche*) has formed a working group, formed by experts from this Authority and from the University of Venice for rethinking the *Protocollo fanghi*. This protocol may be revised, but only toward a more severe safeguard of the public health and of the water quality.

An other problem, impossibile to be solved is the need to put on the edge of new very large Lagoon canals, a continuous rigid barrier, made of stones. A preliminary project of reinforcement of the edges of the Malamocco-Marghera Channel by big stones was actually already approved by the committee for the safeguard of Venice (*Salvaguardia*). Italia Nostra feels that this project does not respect existing laws for the safeguard of Venice and has already presented an appeal in front of the Regional Administrative Court (TAR). This row of large stones would divide the Lagoon in two parts, against the special law for Venice (n°171/1973) which states: «the preservation of the physical and ecological unity of the Lagoon».

Other great difficulties of the possibility of letting large cruise ships arrive in Marghera consist in the impossible mixture of passenger and cargo traffic, forbidden for reasons of safety, as set out in an

¹⁷¹ <https://www.pressmare.it/it/istituzioni/autorita-portuale-di-venezia/2018-08-02/porto-venezia-statistiche-traffici-aggiornate-trimestre-2018-15805>

¹⁷² *Maxi-navi a Marghera? Un maxi-Canale dei Petroli*, pf di Gianni Fabbri, 2018 set. 17.

official act of the Harbour Master's Office¹⁷³ (*Capitaneria di Porto*, which is competent for the identification of alternative routes for cruise ships under the national Clini-Passera Decree): «Concerns of technical and nautical character are repeated – those linked to accessibility, to the organisation and the management of the traffic as well as the issue of allowing passenger ship traffic in an industrial area with interference between passenger traffic and good traffic (among which dangerous goods) and a results possible issue for the safety of navigation». This point was repeatedly made also by the previous President of the Port Authority¹⁷⁴;

Finally Cruise ships should not cross Marghera “high risk” industrial zone (as designated under the EU Seveso Directive), again for reasons of safety; nor should a passenger terminal be built close to oil storage tanks containing highly flammable liquids.

Moreover, scientific studies have shown that the velocity of ships is correlated with their erosive power. Consequently, the speed limit in the Lagoon needs to be reduced (via an ordinance of the Harbour Master's Office). This will increase transit times across the Lagoon, making the “Marghera option” even less possible.

h. Critical aspects of the rule stated on the bases of a Multicriteria analyses prepared by the port authority

The *Report*, at pages 85, 86, 87 quotes the minute approved, and not the Document of the 2017 *Comitatone*:

«In the meantime, “Considering a transitory phase of 3-4 years before the ships are completely removed from the Giudecca canal and the S. Marco Basin», it has been suggested that “in order to further mitigate the impact of navigation of the remaining vessels in the Giudecca Canal, the Maritime Authority might adopt an ordinance consolidating the limits currently in force while evaluating the possibility of establishing a limit that is technically sustainable and compatible both environmentally and in terms of safeguarding architectural and landscape heritage while taking into account the different variables of impact that require mitigation” (extract from the *Comitatone* minutes, p. 12).

The study carried out by the Venice Harbor Authority [*Capitaneria di Porto*] together with the Port Authority and Interregional Office for Public Works [*Provveditorato Interregionale per le Opere Pubbliche*] has been used to define a methodological approach with new parameters and limits with respect to those established in the past. Instead of using the limit relative to the mere tonnage of ships (max. 96,000gt) ... it will define an algorithm containing a series of parameters ... This algorithm is based on the displacement of the ship – that is, the weight of water displaced – on the width, on the height (measured from the waterline) and on the lateral area of the hull. In addition to these physical factors, it will also include analyses of the use of next generation propulsion systems or of liquefied natural gas (LNG) as well the signing of the Blue Flag agreement as described in Recommendation 5 put forward in Decision 41.COM.7B.48.

The new system will contribute to the gradual reduction in the size of ships and in the number of passages».

The «methodological approach with new parameters» is the (is the Multicriteria analysis of the possibilities for cruise ships in Venice (*Analisi multicriteria delle alternative per la crocieristica a Venezia*¹⁷⁵).

We note that, although the new Procurement Law (*Codice dei contratti*¹⁷⁶) foresees the critical analyses of all projects, including the “Zero hypothesis” (Do nothing), the Port Authority has chosen to compare only some projects, excluding the “Zero hypothesis” - which Italia Nostra supports - and another project which exclude cruise ships in the Lagoon, as The *Avamposto galleggiante*. We also note that the Port Authority is not *super partes*, and in comparing the project the Harbour Master's Office is competent (on the basis of Clini-Passera Decree)

Actually, the Italian State did not indicate real objectives, leaving the responsibility to the Port Authority.

¹⁷³ Order no. 08.02.21.25956, of 11th October 2013 of the Harbour Master's Office.

¹⁷⁴ P. COSTA, *Il Porto: impraticabile l'utilizzo del canale Vittorio Emanuele*, «la Nuova Venezia», 2012 mar. 16.

¹⁷⁵ www.port.venice.it/files/page/analisi multicriteria12092017.pdf

¹⁷⁶ D.Lgs. 18 aprile 2016, n. 50.

And the Port Authority in the Multicriteria analysis has defined 17 parameters which, according to it, correspond to important needs such as: transport, economic and environmental needs. However, this last need was considered only from the point of view of the time to be spent inside the Lagoon and other less relevant aspects, but ignored the fundamental problem of the Lagoon, which is its erosion.

The Clini-Passera decree attributes great importance to the safeguard of the Lagoon environment. This should have been the main objective of the project to be examined, as it is also admitted by the *Multicriteria Analyses*, which however adds (at page 25) the aim to be ready to «an increase of demand in the cruise market” represented by ships of different dimensions (200-250 thousand tons as compared to the 96.000 tons of the ships which now pass in front of St Marco, or to the 40.000 tons imposed by the Clini-Passera decree.

The two objectives are contradictory. It is obvious that this *Multicriteria analyses* has given preference to the 4 projects (3 concerning Marghera, and one Fusina) which remove the traffic from the St Marco basin toward the large Malamocco-Marghera Channel. In this way, there would not exist visual impact, but the Central Lagoon would be destroyed.

i. Naval pollution and Blue flag agreement

The *Blue Flag* agreement, as we saw, cannot reduce naval pollution considerably (see p. 26 above).

Final considerations

To conclude, it is interesting to note that the *2018 Report* (pp. 84-86), when referring to inter-institutional cooperation activities concerning these projects, quotes «The **initiation of the verification process of cultural interest for the Canal Grande, the basin and the Giudecca Canal was also ratified** by the Superintendancy of Archaeology, Fine Arts and Landscape of Venice, the territorial office of the Ministry for Cultural Heritage and Activities, competent in matters of protection». This mention is curious to say the least, given the fact that the City of Venice has appealed to strike down this very provision! (see p. 12 above):

In any case, the Marghera and Vittorio Emanuele options would mean aggravating erosion of sediments in the Central Lagoon the alteration of the hydromorphological dynamics of the area.

In fact they involve the abandonment of the objectives of the Special Laws for Venice, which in the Lagoon require: the physical and ecological unity of the entire area, restoration of its hydrogeological balance, the halting and reversing the degradation by eliminating the root causes, reduction of the impacts of port traffic on the Lagoon’s morphology and reduction of the impact of the Oil Tanker Traffic on the currents in the Lagoon.

REVIEW BY ITALIA NOSTRA OF THE SOLUTIONS CONSIDERED BY THE CURRENT MINISTRY OF TRANSPORT AND INFRASTRUCTURES

The *2018 Report* omitted to inform UNESCO that the Government is analysing 14 projects about cruise ships, and three of them are being considered with a special interest. This procedure started on 13 November, one month before the delivery of the Mayor’s *2018 Report* to UNESCO. Among these 14 proposals there is not the project of Vittorio Emanuele channel, which the *2018 Report* presents as the government choice.

The Ministry of Transport and Infrastructure decided to study further three options for a new passenger terminal. This decision was made without any appropriate procedure and without any clear criterion. For every major work, a law – the new Procurement Law (*Codice dei Contratti*)¹⁷⁷ – prescribes the comparison between projects and a public debate. The Ministry has instead given the Port Authority the role to undertake this sort of feasibility study, and not to the Harbour Master’s

¹⁷⁷ D.Lgs. 18 aprile 2016, n. 50.

Office - which would be competent according to the Clini-Passera Decree - and as the Port Authority is the port's governing body, there is therefore a clear conflict of interest.

Here are the 14 proposals. 11 of them are inside the Lagoon (2 on the Lagoon mouths):

1. Marittima limitazione volontaria 96.000 GT (voluntary limitation to) 96.000 GT [Venice];
2. Venice Cruise 2.0 [Bocca di Lido];
3. Montesyndial [Marghera];
4. Terminal di Fusina;
5. Molo Sali sponda Nord [Marghera];
6. Canale Nord sponda Nord [Marghera];
7. Avamposto galleggiante Bocca di Lido;
8. Terminal S. Nicolò, Lido;
9. Alti Fondali, Bocca di Malamocco [Santa Maria del Mare];
10. Chioggia Saloni;
11. Voops;
12. San Leonardo;
13. Dogaletto;
14. Chioggia-Val da Rio;

Among these 14 proposals, the Ministry of Transport And Infrastructures asked for details of three of them: Terminal S. Nicolò, Alti Fondali Bocca di Malamocco e Chioggia-Val da Rio.

The three solutions present the following critical issues:

1. Terminal S. Nicolò (Fig. 70), at the Lido of Venice, on the protected beach area (SIC-ZPS), a natural area that is a nesting site for the plover, an endangered species. The water is very shallow, there is no infrastructure and it is near beaches used by Venetians (and tourists). Building the cruise ship port here would mean killing the tourism economy of the island of Lido, which is a densely inhabited island, because of the enormous increase of air and water pollution. The project is similar to an old one, which included the construction of an underwater Metro system, a huge project that has been repeatedly rejected for its major impact on the Lagoon and its high costs, but that continues to be proposed again.
2. Alti Fondali, Bocca di Malamocco: the Terminal is designed in the cement platform (Fig. 71) – built at Santa Maria del Mare, on the beautiful island of *Pellestrina* as a construction size for the caissons used for the Mose. The enormous platform was built in an area with landscape and environmental protection (a Natura 2000 site) and without the necessary authorisations, as was highlighted at the time by the *Soprintendenza* and the Ministry of Environment. The platform has been considered legitimate by Italian administrative justice only as provisional work. For that reason the Italian State has undertaken to dismantle the platform on the request of the European Union because of the environmental values of the island;
3. Chioggia-Val da Rio (Fig. 72): building the terminal in Chioggia, inside the Lagoon, would require dredging about 10,000 cubic metres of sediment from the canals¹⁷⁸, in opposition to Decision 41 COM.7B.48, Recommendation No. 7, which requires to avoid the excavation of new canals. The intensive dredging and the that it would trigger the same erosive phenomena that led to the destruction of the Central Lagoon Basin

On 18 June 2017, a local association, the NoGrandiNavi (NoLargeShips) Committee, held a referendum in Venice. Venetians participated to express their opinion: 98.7% voted in favour of keeping ships out of the Lagoon and against the dredging of new channels. Undersecretary of State for Cultural Heritage and Activities and Tourism Ilaria Borletti Buitoni called on the government to heed «the voice of 18,000 people».

¹⁷⁸ E. TANTUCCI, *Vittorio Emanuele, Vtp torna alla carica. Nuovo stop del Ministero dell'Ambiente*, «la Nuova Venezia», 2019 apr. 28.

On 8 June 2019, after the incident occurred inside Venice, a very important demonstration was held, organized by the *Comitato Nogradinavi* and with the participation of many associations, including Italia Nostra. 10,000 demonstrators (out of 52,000 surviving citizen) marched peacefully through the city demanding the ousting of the cruise ship from the Lagoon. Times have changed.

In conclusion, based on the information we have provided above, we contend that the 2018 Report presents projects which were not approved by the Government and now have been cancelled by the Ministry of Transport and Infrastructure.

We also we contend that Decision 41 COM.7B.48, Recommendation no. 3 is manifestly unfounded, because: 1. “welcomes” a project which has been dismissed by the new Minister for Infrastructures; 2. “welcomes” a project inside the Lagoon, therefore it is in strong contradiction with Decision 38 COM 7B.27, Recommendation no. 7, which «Urges the State Party to prohibit the largest ships and tankers to enter the Lagoon», with Decision 40 COM 7B.52, Recommendation no. 6 (and even Decision 41 COM.7B.48, Recommendation no. 4, which «request that the State Party continue to implement all the recommendations put forward in the Decision 40 COM 7B.52») which requests the State Party «to adopt, as a matter of urgency, a legal document introducing prohibition of the largest ships and tankers to enter the Lagoon and requests the State Party to put in place all necessary strategic, planning and management frameworks to this end» (on the basis of the outcomes of the 2015 Reactive Monitoring Mission); 3. “welcomes” a project which planned the excavations of ca. 6-7 millions of m³ of sediments inside the Lagoon.

DECISION 41 COM.7B.48, RECOMMENDATION NO. 8

«**Also reiterates its request that the State Party submit, in conformity with Paragraph 172 of the *Operational Guidelines*, details of any newly proposed projects, together with all relevant cumulative Heritage Impact Assessments (HIAs) and Strategic Environmental Assessments (SEA), with a specific section focusing on their potential impact on the OUV of the property**»

The *2018 Report* totally omits to respond to Recommendation No. 8.

The Recommendation requires the transmission of «details of any newly proposed projects», together with HIA and SEA assessments.

The *Report*, to point 1 of the answer, states that the *Update of the Morphological and Environmental Plan of the Lagoon of Venice* has been submitted to SEA. But it is precisely a plan, and not a project.

Nothing is said about any strategic environmental assessments for work in progress in the Venice Lagoon, such as those of strong environmental and social impact, as the consolidation of the Malamocco-Marghera Canal, the new LPG plant at Chioggia, or the 2021 Master Plan of the Marco Polo Airport.

In point 2 of the answers, the assignment of tasks to experts with interdisciplinary skills and highly specialized previous experience is reported, for the performance of asset impact analysis (HIA), but nothing is said about the projects in progress.

The *2018 Report* is silent on almost all the major works planned for Venice and in the Lagoon. Below is a brief review of some of them. Our Association can provide documentation on all of them.

in the Lagoon:

- The construction nearing completion only 300 metres' distance from the centre of Chioggia (Figs. 72-76) in the locality of Val da Rio of an LPG and diesel fuel facility with a total capacity of 10,350 cubic metres, of which there are 3 tanks of LPG, each of 3,000 cubic metres. The project, presented by *Società Costa Bioenergie Srl*, has been approved by the inter-Ministerial Decree of the Ministry of Economic Development, in concert with the Ministry of Infrastructure and Transport, No. 17407 of 26.5.2015.

The Opinion No. 4/2015 of the Environmental Impact Assessment Commission of the Province of Venice maintains that the plant carries risks to public health, for the potential emission of harmful substances into the atmosphere, and the potential risk of explosion.

The plant also has a great impact on the Lagoon landscape and has obtained the landscape authorization required by Article 146 of the Legislative Decree of 22nd January 2004, No. 42, without preliminary investigation and with a clearly illegitimate procedure, as acknowledged by the ruling of the Veneto Regional Administrative Court No. 604/2018 and by the sentence of the Regional Administrative Court No. 1396/2019. However, the Administrative Judges could not proceed with the cancellation of the authorization due to the tardiness of the Council of Chioggia. Finally, as regards the environmental compatibility of the intervention, the Province of Venice has decided not to subject the plant to an Environmental Impact Assessment.

The plant would create an increase in the passage of dangerous ships in the Lagoon, in contempt of the special Law No. 798/1984 (*Nuovi interventi per la salvaguardia di Venezia, New interventions to safeguard Venice*), imposed in 1984 «to avoid the transportation of oil and by-products into the Lagoon».

This facility – which seems to lack environmental authorisations and also has been strongly opposed by the Chioggia Municipal Council – is located in a densely populated area, despite the risks of explosion. It also has a great impact on the landscape and would great an increase in the passage of ships with dangerous cargo in the Lagoon.

- The plan for a “hub (for all the Adriatic Sea and Northern Italy) for the storage and distribution of LNG” in the Lagoon, in front of Venice, along the South Industrial Canal of Marghera (Fig. 77) – in other words, a natural gas terminal with a capacity of 30,000 cubic metres. The liquefied natural gas

would be used “as fuel for cruise ships, cargo ships and road transport”¹⁷⁹. The initial design is now being prepared, and the facility will then go through an environmental impact assessment. This is a facility with a “risk of a significant accident”, as it is for a highly flammable and explosive gas: a leak that comes in contact with the warm water of the Lagoon would create an invisible and odourless cloud that a simple spark could transform into a fireball. The press noted the example of 500 deaths in 1984 in a suburb of Mexico City due to a leak from one or two gas tanks of only 1600 cubic metres. LNG tankers would pass through the Lagoon’s congested Malamocco-Marghera Channel, where transit is already only in one direction at a time and where passenger ferries pass. The facility would be built in an area where already other high-risk establishments are found near communities where people live and in front of Venice.

- The project, approved by the Safeguard Commission, for an embankment of the Malamocco-Marghera Channel with steel sheet piles. The Project is part of a larger plan (not approved) to use large rocks for the embankments, an alien material for the Lagoon and thus prohibited by the PALAV. Italia Nostra has made a court appeal against this project;
- A Morphological and Environmental Plan for the Lagoon of Venice does not exist: the Update to the current Plan was blocked by the Ministry of Environment (see pp. 69-71 below)
- The construction of large structures – in protected areas (with the presence of protected species) on all six borders of the three outlets from the Lagoon to the Adriatic – to be covered by continuous, multi-coloured glass windows to hide the technical structures of the Mose (Fig. 79). Italia Nostra took part in the public debate on this proposal with the hope of contributing to a reduction in the size of these structures, though one year after this debate there is still no news of the conclusions;
- The probable enlargement of the artificial island of *Le Tresse*, in front of Venice and near the bridge to the mainland. The national Special Laws for Venice and the Area Plan for the Lagoon and Venice (*Piano di area per la Laguna e l’area veneziana*, PALAV) prohibit the construction of artificial islands. But in 2004, as the Malamocco-Marghera Channel was filling with sediment (due to the fact that it is not compatible with the Lagoon’s dynamics), a “Special Commissioner for the socio-economic environmental emergency pertaining to the major shipping canals of the Venetian Lagoon”¹⁸⁰ was established. This Special Commissioner had wide powers that can override urban planning instruments. Since the institution of the Special Commissioner regime “over 7,000,000 cubic metres”¹⁸¹ of sediment has been dredged from the Malamocco-Marghera Channel (and adjacent areas). The highly polluted sediment has been taken to *Le Tresse*, which is de facto a landfill in front of Venice. The works were completed in 2012 but a further 82,800 cubic metres of sediment to be dredged out of Venice’s canals is to be stored at *Le Tresse*. The wall of polluted mud (9 metres high) in this landfill is visible from Venice and alters the landscape of the Lagoon (Fig. 80);
- The construction of a multi-level garage on the island of *Sottomarina*, near the Fort of San Felice in Chioggia and very close to the monumental *Murazzo*, a sea defence work built by the Republic of Venice in the 18th century;
- The plan to build a tourist village on Pellestrina at Ca’ Roman, a protected natural area (Fig. 81). The project would include the partial recovery of abandoned buildings in this area, together with new construction – almost 25,000 cubic metres of villas and other structures – in an area of high natural and landscape values, an area where construction is not allowed according to the PALAV. Both a 1956 Decree of the then Ministry for Public Education and the 1995 PALAV protect the landscape of this area, which is included in the European Natura 2000 network (it makes up the southernmost part of the Sic/Zps IT3250023 “Lido of Venice: shoreline biotopes” and borders on Sic/Zps IT3250046 “Lagoon of Venice” and the SIC IT325030 “Lower-middle Lagoon of Venice”. The amendment to the urban plan (*piano regolatore generale*) for the island of Pellestrina states that in this area only “actions for the reconstruction of buildings and the demolition and reconstruction of

¹⁷⁹ G. FAVARATO, *Nuovo deposito di gas liquido in Laguna*, «da Nuova Venezia», 13 mag. 2017.

¹⁸⁰ Prime Ministerial decree of 3 Dec. 2004 & order n° 3383.

¹⁸¹ *Relazione sull’attività svolta dalla gestione commissariale*, updated to 31 Oct. 2012 (from the Special Commissioner’s website), p. 23.

buildings” are allowed. The company’s plan instead would lead to – as noted by the judges of the administrative court, who accepted Italia Nostra’s appeal against the project – “a systematic set of actions of demolition, reconstruction and new construction on substantively different plots from those which were occupied before”. The sentence has been contested both by the company proposing the project and, separately, by the City of Venice.

- exponential growth of the airport (Fig. 82). In 2018 passenger traffic grew by 7.8%¹⁸². Marco Polo abnormally is Italy’s fourth important airport (before Malpensa, Napoli, Bologna, Palermo e Ciampino!). Before 2025 it will double and before 2035 it will triple, bringing the number of passengers from 11 million to 16 million¹⁸³. It is necessary to stop the exponential growth of the airport for many reasons. Because of its sprawl and land take, for the planned constructions of hotels, a shopping mall, and a football stadium in an agricultural area. The development of the airport also includes the burying of salt marshes areas of the Lagoon, even if the expansion of the airport areas in Laguna is prevented by the 1973 Special Law for Venice and by a 1993 regional law (PALAV). The 1973 Special Law for Venice prescribes the «preservation of salt marshes» and the «exclusion of further fillings» in the Lagoon, and already some salt marshes have been filled. The expansion will also be very close or even bury part of the archaeological site of Altino, one of the largest late Roman cities! Others very strong reasons not to further develop the airport facilities are the air pollution which is already at an unsustainable level and the contribution to tourism pressure. The enlargement of Marco Polo airport will be in part financed by European Investment Bank (EIB)¹⁸⁴, that also financed Mose. In its website EIB states «The EIB provides finance and expertise for sound and sustainable investment projects worldwide»; «As the largest multilateral provider of climate finance worldwide, we are committing at least 25% of our investments to climate change mitigation and adaptation, supporting low-carbon and climate-resilient growth». This investment seems not the case.

We recall the words of the 2015 Reactive Monitoring mission in its *Mission Report*, p. 30: the airport has **«reached carrying capacity as well as the limit of compatibility with the maintenance of the heritage values of the Lagoon, notably in the surroundings of the airport and its connection with the City of Venice. Substantial expansions of the current international airport facilities need therefore to be planned for another location outside of the WH property and its future buffer zone»**.

- planned construction of a new football stadium in an agricultural area near the airport. The new stadium could instead be planned in the abandoned industrial site of Marghera, avoiding soil consumption;
- Project of further concretization in the Lagoon gutter, south of the trans-Lagoon bridge (Pili area). A Motion of the Municipal Council of 6th February 2018: «undertakes to support those who, by virtue of the planned urban planning regulations and derived public benefits, want to invest in that area» giving «positive opinion on the possibility that the proposal for future development includes the construction of a sports hall and ancillary services in the Pili area». The Pili area is an area of land heavily polluted by chemicals from nearby Porto Marghera, facing the Lagoon and facing Venice. The projects are not limited to cleaning up and restoring natural habitats, but include urbanization and the construction of a sports hall, luxury homes, a hotel and a casino. The owner of the area is the Mayor of Venice, Luigi Brugnaro.
- The project to build the “Venus Venis” skyscraper in Marghera, approved by the Environmental Impact Assessment Commission VIA (EIA) of the *Città Metropolitana* (Metropolitan City)¹⁸⁵. This would be a luxury tower 110 metres high with a five-star hotel of 120 rooms on eight of its floors. On top two floors, a rotating restaurant would look over the Lagoon and Venice. This 80 million Euro¹⁸⁶ project echoes the “Palais Lumière” skyscraper proposed by Pierre Cardin. The glass tower

¹⁸² F. FEN[ZO], *Crescita passeggeri, gli aeroporti Save volano più in alto degli scali italiani*, «Il Gazzettino», 2019 gen. 25.

¹⁸³ M. CHIARIN, *L’aeroporto raddoppia: 16 milioni di passeggeri entro il 2035*, «nuovaveneziaeglocal.it», 2018 dic. 17.

¹⁸⁴ M. C[HIARIN], *Sviluppo Save, prime critiche al gigantismo*, «la Nuova venezia», 2018 dic. 12.

¹⁸⁵ M. CHIARIN, *Si alla mega torre Venus Venis, il nuovo colosso di Marghera*, «nuovaveneziaeglocal.it», 2018 lug. 7.

¹⁸⁶ M. CHIARIN, *Torre Venus Venis, affare da 80 milioni*, «la Nuova Venezia», 2017 gen. 19.

would be illuminated at night and would create, among other things, a major visual impact on the Lagoon and on Venice (Figs. 83-85);

- VGATE Project, multi-mode deep sea terminal, off the Adriatic coast and the coast of the Municipality of Chioggia (Fig. 86). The off-shore platform, about 2.3 km from the coast, will be connected by two viaducts with bays: one dedicated to the road connection up to the Romea State Motorway, the other connected to the rail link up to the Chioggia-Rovigo line.

The terminal will impact highly on the marine and natural landscape of the coastal area, close to protected areas such as the Wwf oasis of Ca' Roman, and the Regional Park of the Po Delta, one of the largest wetland reserves, a UNESCO Heritage Site. In the middle of the sea, a road for lorries and a railway!

- The transformation of abandoned islands of the Lagoon into hotel sites, as has occurred in past years for the islands of Sacca Sessola and San Clemente and the imminent completion of others, such as the Spignon Lighthouse (Fig. 87) and the Island of *Le Grazie*. The national Budget Law for 2019 (*Legge di Bilancio 2019*) foresees a programme for the sale of public buildings that should provide proceeds for a minimum of 950 million Euros in 2019 and 150 million Euros in each of 2020 and 2021. By the end of April 2019, a “Plan for the disposal of public buildings” should have been approved – it surely will include islands of the Lagoon and buildings in Venice whose future use will inevitably be for hotels.

- The Port Authority’s plan to reconvert the cement platform (Fig. 88) – built at Santa Maria del Maria on the island of Pellestrina as a construction site for the caissons used for the Mose – into a commercial container port for ships of up to 400 metres in length. The choice of this location was one of the worst decisions made by the Mose project – the enormous platform was built in an area with landscape and environmental protection (a Natura 2000 site) and without the necessary authorisations, as was highlighted at the time by the *Soprintendenza* and the Ministry of Environment. The project proponents claimed that authorisations were not necessary as it concerned “temporary works in the sea”; according to the City of Venice, which in 2008 made an appeal to the Regional Administrative Court, the platform was in fact a permanent work and thus required the necessary landscape authorisations.

The EU opened an infraction procedure against Italy. In his letter, then European Commissioner for the Environment Stavros Dimas stated that area had been “allowed without any appropriate assessment of potential impacts” on the Natura 2000 site. The procedure was set aside in 2009, as Italy was required to undertake environmental compensation actions, as defined in the so-called European Plan¹⁸⁷. Among the actions, the platform and the whole building site were to be dismantled.

The building site is now unused as the caissons have been built and positioned on the seabed, and the area should be restored.

- New projects for large cruise ships. As we saw the Ministry of Transport and Infrastructure recently decided to study further three options for a new passenger terminal. This decision was made without any appropriate procedure and without any clear criterion. For the sites identified by the Ministry see p. 56 above);
- The plan, approved by the City of Venice¹⁸⁸, to build in the San Giuliano Park (located on the inner shore of the Lagoon, near the bridge to Venice), a structure to “make the large green area useable... for the organisation of musical, cultural, sporting events with the capacity for attraction at regional and national scales”, “for the organisation of large events that can attract large numbers of users, tying these events also to the name of the city, with the foreseeable returns for the whole value chain and for the city itself”. Local Associations, among them Italia Nostra, underline that an appropriate assessment is needed to assess the possible impacts on the conservation of habitats and species

¹⁸⁷ *Piano delle misure di compensazione, conservazione e riqualificazione ambientale dei SIC-ZPS IT3250003 e IT3250023; dei SIC IT3250030 e IT3250031 e della ZPS IT3250046 - quadro aggiornato 13/06/2011*

¹⁸⁸ Resolutions of the Municipal Council no. 239 of 12th July 2018 and no. 344 of 7th November 2018.

found in the nearby Natura 2000 site – as well as an environmental impact assessment. The project moreover favours mass tourism.

- The project – for the moment blocked by Italia Nostra via an appeal to the Regional Administrative Court (against a resolution of the Municipal Council of February 2016) – to build next to the Sant’Andrea Fort a complex including hotels and a swimming pool looking out onto the Lagoon (Fig. 89). The monumental Sant’Andrea Fort, built by Michele Sanmicheli between 1543 and 1549¹⁸⁹, is a masterpiece of military construction. The hotel project is now at a standstill, but as it is supported by the City of Venice, an adjusted design could emerge;
- we have to mention also that the Parco della Laguna Nord was abolished by the current Municipal Administration¹⁹⁰.

Projects in Venice:

Recommendation no. 3 of Decision 40 COM 7B.52 also fears «**the loss of architectural and town-planning coherence of the historic city**».

The *2017 Report* states (p. 29): «Our reply is that the current building regulations for the Old Town are extremely stringent and sufficiently ensure the conservation of the particularity of the architectural context». This statement does not completely conform to the truth. When a proposed intervention is a large investment, in past years derogations to the rules in place have been allowed in the name of a questionable “public interest”.

Here are few examples:

- The most striking case has been the *Fontego dei Tedeschi*, at the foot of Rialto Bridge. The Fontego was extraordinary for its architectural features and also for the importance of the economic role it once played. Built in the Renaissance style at the beginning of the 16th, but with an open central courtyard like the Middle Eastern ‘caravanserais’ (*funduq*) (closed by a glass skylight in the 1800s), it was the fulcrum of trade and exchanges between the East and northern Europe. Beloved by Venetians, until a few years ago it was the seat of the Central Post Office. With fewer inhabitants, the offices were reduced and the Post Office sold the building. For 6 million Euros the City also sold its public designation, opening the way for its reuse as a large, luxury shopping centre. A large shop could be created without altering the building. The new owners decided instead to create a new modern building designed by a fashionable “archistar”. There are major alterations. Among the most serious: 1. a raised floor in glass and steel above the 16th century central courtyard; 2. a hole two stories high in the 16th century loggia to show the escalators behind; 3. a huge terrace on the roof. The so-called restoration of Venice’s monumental architecture is no longer a simple act of historical enquiry and restoration, but a new creation based on a modern vision. These interventions – carried out in a derogation from the requirements in place – were possible to obtain a misunderstood public benefit: funds for the City Government and ‘recovery’ of an abandoned building. A step that unfortunately can be taken for other historical buildings.
- The alternation of Venice’s original pavements has been one of the gravest and moreover irremediable interventions undertaken in Venice – one that has compromised the Outstanding Universal Value of the site. St Mark’s Square was paved in trachyte and Istrian stone in 1723, based on a plan prepared by Andrea Tirali¹⁹¹. The notably heavy rectangular blocks used were called *masegni* (boulders). In 1990, the city-owned company created to maintain the canals and streets, Insula, dedicated the first issue of its magazine, *Insula*, to the *masegni* and the state-of-the-art methods for their upkeep. This once-unitary pattern is now forever marred. Here is a brief review¹⁹²: in April 2016, Mayor Brugnaro announced in a press conference in Rome, together with then Prime Minister Renzi, that Venice would be one of Italy’s first five cities to start

¹⁸⁹ P. MARCHESI, *Il forte di Sant’Andrea a Venezia*, Venezia 1978, p. 20-22.

¹⁹⁰ E. T[ANTUCCI], *Brugnaro abolisce il Parco della Laguna*, «nuovaveneziaeglocal.it»; *Il consiglio comunale blocca il progetto: Venezia, addio al Parco della Laguna nord*, «www.veneziatoday.it», 2016 apr. 15.

¹⁹¹ L. DALLE PIANE, *La pavimentazione di Piazza San Marco*, in *Restauro e ricerche*, a cura di G. Cristinelli, Venezia 1992, p. 116.

¹⁹² With the help of professor Marco Rosa Salva, a musician who for the sake of Venice documented these works: see www.facebook.com/masegnivenezia.

works for a new network for optical fibres¹⁹³. To implement this plan, the City of Venice reached two separate accords¹⁹⁴ with two telecom companies (Open Fiber SpA, owned by Enel and Cassa depositi e Prestiti; and Flash Fiber Srl, owned by TIM and Fastweb). The two companies built two competing but identical networks, and thus the works need were deliberately doubled.

The accords with the two companies referred to a common set of rules (the *Protocollo d'intesa sulle modalità d'intervento sulle pavimentazioni storiche*¹⁹⁵) to address the paving stones. These rules state that:

«The system of Venice's external paving, predominantly in trachyte, is an integral part of the city's architecture as it is an element of quality that distinguishes the historical centre of Venice, the islands and the historical centre of Mestre, of particular relevance under its environmental profile and as such protected in several situations

«The objective to pursue is that of maximum conservation of the paving elements in trachyte, guaranteeing at the same time the indispensable requirement of functionality, both in terms of public safety as well as resistance to tidal flooding, and in addition that of preserving in some measure the material resources of the quarries of the Euganei Hills».

Specific requirements on interventions included the following:

«Once the work is identified, the elements should be numbered and photographed in the area, in groups of 3 cubic metres of surface area»

«The removal of the paving should be undertaken by expert personnel with the use of appropriate tools to minimize the possibility of damage to the elements

«The stacking of the elements should take place within the fenced area, collecting the elements removed and covering them with packaging as appropriate, on identified pallets»

«In the area of intervention... the existing elements will be replaced... with a sufficiently close joint to endure the stability of the elements»

«The chromatic tonality and the surface work of any integrating elements should be chosen to be similar with the existing elements».

The replacement of the paving elements should be done in such a way to ensure their preservation of both the whole system as well as the individual elements in the face of saltwater intrusion.

Despite these requirements, which have been explicitly set out, all of a sudden in 2017 hundreds of construction areas were opened across the city. The *masegni* were removed without the use of the appropriate instruments (and often with mechanical means), causing damage to many of them, and they were in part put back in place on a cement foundation (not as before, Fig. 95) and in part substituted with new elements (Fig. 94). There is no indication that they were numbered and photographed and they were often stacked in areas without proper surveillance.

In addition, thousands of inspection cavities were created (each larger than one square metre, Figs. 92-93), with metal tops covered by a thin layer of stone that created wounds through a once-uniform paving, destroying the visual continuity of colours and materials that was a characteristic of Venice's pavements for centuries (Figs. 90, 91).

There are no official data, but a survey of the cavities in the *insulae* of Santa Maria Formosa and San Severo (25 and 54 square metres, respectively) would suggest that that for the city as a whole, between 2500 and 10,000 square metres of historical paving were replaced by the new covers¹⁹⁶.

None of the cavity coverings reuse the original materials, and it's not clear how many of the original *masegni* were conserved, nor where they are found. The new material used almost never respects the requirements in terms of chromatic or surface characteristics; moreover, the new covering material is fragile and inadequate for Venetian demands – these are thin layers of 3 to 5 centimetres, against about 20 centimetres for the traditional *masegni*.

In addition, the protection for the cables that go from the ground up the facades of the buildings, including historical palaces, was done with thousands of plastic tubes; aerial cables run from one

¹⁹³ *La promessa di Renzi: "a Venezia la banda ultralarga entro quattro anni"*, «La Nuova Venezia», 2017 apr. 4.

¹⁹⁴ Decisions no. 231 of the 2nd August 2016 and no. 14 of the 7th February 2017.

¹⁹⁵ The *Protocollo d'intesa sulle modalità d'intervento sulle pavimentazioni storiche*, agreed by the *Soprintendenza* for architectural and landscape heritage and the City and adopted by the City Government in April 2017.

¹⁹⁶ See www.facebook.com/masegnivenezia.

façade to another, covering the streets, and hundreds of exchange boxes are positioned in front of the buildings.

Numerous citizens have complained about the impropriety and offense of these interventions, due in part to the fact that the work was sub-contracted without any heed to the requirement for qualified personnel, and the local press has documented these problems. An online petition reached 3000 signatures. However, it must be asked why the *Soprintendenza* has remained immobile¹⁹⁷.

The loss of the unitary character and homogenous texture of the pavements is a grave loss for Venice;

- The plan to carry out maintenance works for the Mose in the Arsenale. After years of struggle, the request put forward by a local association, the *Forum Futuro Arsenale* (supported by Italia Nostra) to move the site of these works from the historical Arsenal to the Marghera industrial zone was accepted by the Interregional Office for Public Works [*Provveditorato Interregionale per le Opere Pubbliche*], which moreover estimated that doing so would yield 90 million Euros in savings¹⁹⁸. The historical function of the Arsenal has always been shipbuilding, not industry. The proposal to carry out the maintenance of the Mose in the Arsenal would have required the construction of a large industrial building with a wastewater treatment plant. It would have meant that the Arsenal's monumental Bacino Grande – from the 19th century, without equal in all the Mediterranean (Fig. 97)– would have lost its shipbuilding role and instead have been used as an industrial dock for the Mose's gates. The Arsenale instead needs to be relaunched with enterprises and artisans inline with its history. We fear, however, that the plan to use the Arsenal for the Mose could return, as it is supported by the Mayor;
- Following the planned move of the maintenance of the Mose to the Arsenale, the concrete docks bounded by guard rails recently constructed in the Lagoon, close to the crenellated walls of the Arsenale, to serve for maintenance of the barriers, must be removed and the places restored! But no-one talks about it, and so the project in this sense, does not exist;
- The project of new luxury houses for tourists in the area called Ex gasometri, near the San Francesco della Vigna church¹⁹⁹ (Fig. 99);
- The project, announced by the Mayor, to build 200 new luxury homes on Sant'Elena²⁰⁰.
- The construction of a new luxury hotel near the former botanical garden of San Giobbe. The Marseglia group purchased this area to build yet another hotel (this time for the Canopy Hilton chain). After a mobilisation of citizens that saw over 1000 signatures in less than two weeks and public assembly by the District council of Venice, Murano and Burano (called *Municipalità*²⁰¹), Mayor Brugnaro stated that permission to change the use allowed for the plot would not be granted. The urban plan foresees that the plot would be used for residential buildings with reduced rents and that a large part of the green area would be maintained. Nonetheless, the risk remains that this powerful group, which has purchased the plot for a large sum, will not retreat and instead will insist that the City allows a hotel there, citing the funds that will flow to the City's coffers and the jobs that will be created, as well as the 'improvement' of the neighbourhood;
- On going restoration work of the monumental Procuratie Vecchie in San Marco square, by Chipperfield, an architect who has already proved to be antithetical to Venice. One just has to look

¹⁹⁷ *Masegni in stile arlecchino, manca la trachite, rattoppi diversi*, «Il Gazzettino», 2017 lug. 12; *Venezia rattoppata per la posa di nuovi cavi della fibra: masegni distrutti*, «La Nuova Venezia», 2018 mar. 10; A. VITUCCI, *Lo sfregio, masegni tagliati col flessibile*, «La Nuova Venezia», 2018 mag. 10; *Basta masegni sfregiati: la città merita rispetto*, «La Nuova Venezia», 2018 giu. 27; E. Lorenzin, «Fibra, lavori fatti male: spariti 15 mila masegni», «Corriere del Veneto», 2018 giu. 27; G. B. S.C., *Centinaia di masegni abbandonati. Un cimitero tra rovi e sterpaglie*, «Corriere del Veneto», 2018 ott. 10.

¹⁹⁸ A. VITUCCI, *Manutenzione delle paratoie Marghera*, «La Nuova Venezia», 2018 dic. 5.

¹⁹⁹ P. CARCASSI, *Ex gasometri, una palestra in cambio di case per turisti una darsena e l'antico campo*, «Corriere del Veneto», 2018 mag. 16.

²⁰⁰ *Duecento case, posti barca e sport. Un nuovo quartiere a Sant'Elena*, «Corriere del Veneto», 2017 dic. 30.

²⁰¹ The *Municipalità* is a body for participation, consultation and exercise of delegated functions, according to the D.Lgs of the 18th August 2000 n. 267, art. no. 17, paragraph no. 1. The Municipality of Venice (*Comune* in Italian) is divided in 6 *Municipalità*: Chirignago and Zelarino, Favaro Veneto, Lido and Pellestrina, Marghera, Mestre and Carpenedo, Venezia Murano and Burano, three for the Mainland and two for Venice and the islands.

at the extension of the cemetery of San Michele, carried out by filling a part of the Lagoon: the grey wall wiped the spirit of place, its colours and history. In previous years, the Procuratie have been subject to many demolitions (Figs. 100-103), may be to pave the way to the intervention of Chipperfield, of which the town and citizens have been kept in the dark. The project has been submitted only recently and one can see that the top floor of the historic Procuratie has become an ultra-modern auditorium which could be found anywhere else in the world, uprooted from the context (Fig. 104). Instead of star architects with a huge ego and applauding short-sighted public following them, Venice would need cultivated and “invisible” architects to restore the monuments resisting the temptation to superimpose their work to history;

- After the heavy intervention of Koolhaas at the Fontego dei Tedeschi, which no longer is a work of the Venetian Renaissance but that of a star architect, (and, in fact, it is now known as the “Koolhaas Fondaco”) and the forthcoming change in the Procuratie, Italians can indulge in their provincialism having fun in Piazza San Marco and even in San Giorgio, where the wonderful outdoor Teatro Verde will be covered (Fig. 105); the project is by Norman Foster, the umpteenth star architect who can boast of having built in Venice in the XXI century (after Ando, Botta, Koolhaas, Calatrava). Architect Codello²⁰² is the director of the Cini Foundation in San Giorgio Island, formerly its Superintendent, who also authorised the “restoration” of the Fondaco dei Tedeschi. Paradoxically, culture can harm Venice: in recent years the Cini Foundation has strengthened its presence in town with events, exhibitions and conferences of high cultural profile. However, at the same time and also because of the shortsightedness of the local Authorities, several activities of high value for the city life had to leave. Maybe these activities did not fall within the Foundation statutory objectives but constituted a fundamental part of the social fabric, such as the vocational school for maritime activities “Giorgio Cini”²⁰³. The “Squero” of the San Giorgio island, which was still operating (young boat builders and students of the school launched a Caorlina in 2003, a big traditional boat, with rows and oarlocks) has now been transformed into an auditorium, (for us bitterly) called “Lo squero” (Fig. 106). Beautiful view on the Bacino. Was it necessary? Doesn’t culture also mean respect and protection of the Venetian life and civilization?
- Also art events, when oversized as the Biennale is, affect and damage the town, but only few have the courage to say it. As Miracco, former Advisor of a Minister of Cultural heritage, said: « In exchange for rates worth millions, Venice Biennale has intensified at the highest level its “obscure side” of promoter of “side events” which use dozens of areas in buildings rented for exhibitions scattered everywhere in every “Sestriere”»²⁰⁴. As a matter of fact, “public and private areas for rent for exhibition purposes in town in view of the Biennale were more than 260 »²⁰⁵. The turnover moved by the Biennale has multiplied: «certainly not less than 30 million euros, excluding satellite activities such as hotels, restaurants and tourist rentals. For this reason, all categories, starting from hoteliers, love this Biennale»²⁰⁶. Collateral damage of an event far too big for the city also includes an increase of wave motion. Not only this: the Biennale got its eyes on the Lazzaretto Vecchio, an island in front of the Lido, where the Venetians have been waiting for years the realization of the Museo della Città e della Laguna (the Museum of the city and the Lagoon), with the recovery and restoration of the two extraordinary medieval vessels discovered in the Lagoon (one is the only survived galley of the Serenissima), by the San Marco island in Bocca Lama and left under the mud for lack of funds. The Biennale wants to expand also in this island and is already building a cafeteria and a restaurant (for “cultured” tourists). As a consequence, the prospect of the museum seems unlikely and will be stifled.

²⁰² The architect Codello denounced Italia Nostra for defamation, along with the journalist Gianantonio Stella, *il Corriere*, *la Lipu* (The Italian League for the Protection of Birds) and others. Italia Nostra, who won the case, had only requested a ministerial inspection. As the Court argued, the remarks of Italia Nostra «nevertheless fall within the scope of the ordinary exercise of criticism» and the solicitation of an inspection likewise falls «between the legitimate petitions of any citizen».

²⁰³ M. ZANETTI, *Venezia perde anche i servizi elementari*, «La nuova Venezia», 2017 mag. 29.

²⁰⁴ F. MIRACCO, *Venezia superstar e la monocultura turistica*, «La nuova Venezia», 2017 mag. 22.

²⁰⁵ E. TANTUCCI, *Più di 260 gli spazi offerti affittano anche USL e IUAV*, «La nuova Venezia», 2017 mag. 5..

²⁰⁶ E. TANTUCCI, *Mostre della Biennale un affare da 30 milioni*, «La nuova Venezia», 2017 mag. 5.

- The increasingly clear transformation of Venice in a showcase for high level exhibitions and cultural and artistic foundations is welcomed as a great opportunity for the town. It certainly is for the high-end hotel sector, which keeps growing. One does not realize that this is a perverse way of “using” Venice, of fundamentally altering the nature of a city, which is already experiencing a crisis. Venice now needs greengrocers and inhabitants more than exhibitions worth millions. Less money and more life for Venice.
- Less money, more life but also more culture for Venice! Or at least that which is not taken away: in May 2019 the Mayor’s project to strip Venice of the ancient book and manuscript collections of the Correr Museum, after 200 years of history, has left scholars from all over the world dismayed. As stated by the former Rector of the IUAV University and architectural historian Amerigo Restucci, «the Library collections must remain alongside the Museum works». The reason would lie in the necessity to restore the Library rooms. But the Mayor, in a video interview, has also said «We need to restructure (not restore!) the rooms of the Correr and expand the exhibition space», and has spoken of the intention to create «a great pool of knowledge in Mestre». ²⁰⁷ The City is in the dark, but it is reasonable to fear that the Correr stripping is definitive and not transitory, and this in order to bring “culture” to Mestre and also to expand the exhibition halls of the Correr Museum. To free up the halls of the Correr, still alive and frequented by scholars from all over the world, to allow an expansion of the Museum in order to attract even more tourists? To curry favour with the 180,000 inhabitants of Mestre at the expense of the 50,000 Venetians?
- Project to convert the former Ospedale al Mare in the Lido island into a two 500-room luxury resorts. The Ospedale al Mare constitutes is a part of the city with listed buildings, church, theatre and streets, and a beach where protected species nest²⁰⁸ (Fig. 107)
- The historical palaces of Venice continue to face the grave risk of being converted into hotels, distorting their interiors: one example alone is the high number of bathrooms that need to be inserted into the historical buildings.
- The restoration of the many less renowned residential buildings is often inappropriate – the practice of replacing the historical Istria stone has become normal – putting a whole urban pattern at risk. This is the case of Palazzo Bottacin, restored by Ca’ Foscari University. The photo (Fig. 108) testifies to the inability to grasp the importance of preserving Venetian building materials. In the windows of the ground floor on the Calle de la Frescada, the Istrian stone, certainly corroded by the centuries and by salts, has been replaced instead of carefully restored.
- Also the fabric of even minor buildings is greatly at risk, following inappropriate restoration. And the practice of replacing ancient Istrian stone is sadly normal.
- The *2017 Report* (p. 30) also indicates the intention to make dangerous revisions to urban planning rules: the «precise and binding limits to the changes that can be made even inside buildings - which can however be bypassed - are often perceived by the population as being too rigid and limiting the possibility of adapting the buildings to the needs of contemporary life, even in the residential sphere. This aspect is often identified as one of the reasons that discourage people from continuing to reside in the historic centre of Venice and the Lagoon islands. Therefore, these regulations will be subjected to specific evaluation by the local administration in the review of the planning and building regulations in order to support the return of residential, productive and economical to the historic centre of Venice and the Lagoon islands». The claim that these rules are “one of the reasons that discourage people from continuing to reside in the historic centre of Venice and the Lagoon islands” bears no relation to the truth: the fact is that the lack of decent work outside the tourism sector, the lack of services for inhabitants and the unsustainability high cost of housing and of living, along with social disaggregation, tourism pressure and the loss of the city’s identity are driving people to leave Venice.
- Other projects are almost beyond words. One example is the reconstruction of the ponte Molin by the Port Authority: this bridge connects the *Fondamenta delle Zattere* to the Venice Marittime Station

²⁰⁷ <https://mestre.veneziatoday.it/libri-biblioteca-correr-ex-emeroteca.html>

²⁰⁸ *Un mega progetto turistico per far ripartire l'ex ospedale al Mare*, «veneziatoday», 2019 giu. 14.

where cruise ships dock and its 'reform' from a traditional Venetian bridge into a futuristic wooden slide (Fig. 109) seems to have been done only to allow tourist trolleys to roll over easily. Moreover, the fact that the Port rather than the City has the competence for this bridge is only one of the many aberrations in competences that need to be straightened out.

- A further grave risk hangs over Venice's cultural heritage: 21 years after the fire that destroyed *La Fenice*, the opera house, the rebuilt building lacks a complete fire prevention system. As the former provincial commander of the fire brigades lamented, "the network of fire prevention systems has a value at least equal – or truly larger than – that of the Mose for [Venice's] protection: the city can live with water but cannot live with fire"²⁰⁹.

The first risk as ever is that of fire, not of high waters – given the density of the city's population, the materials used for its construction including ancient wood, and the difficulty of that emergency boats face in manoeuvring rapidly through the city. We should remember that in the past, fires have destroyed the Doge's Palace and the Rialto neighbourhood. Guardi's famous drawings show the blaze at San Marcuola. And in recent decades, there have been fires in St Caterina and in St Geremia churches, in homes in Campo della Guerra, in the Coin department store and in the Mulino Stucky, not to mention La Fenice.

For all Venice, in 2017 an estimated 30 million Euros were necessary to complete its fire prevention system (40% of the system was still needed), but in the three-year Municipality Plan of interventions to 2019, no amount is listed for this purpose. The opposition in the Municipal Council has accused the Mayor of having redirected funds allocated for this purpose (in a 2009 budget) for other uses, such as lighting for the football stadium and the restoration of Ca' Giustinian, a palace that has been given for free to the Biennale²¹⁰.

The Municipal Council then allocated 2.2 million Euros in 2017 and 1.5 million more in 2018, with a further 3 million in its budget for 2019²¹¹. The situation, however, remains of grave concern: «Meeting the requirements for buildings that need a Certification of Fire Prevention, in terms of fire safety, is in practice impossible due to the large number of historical buildings in Venice, as they would require, among other elements, complex works to build water accumulating tanks. For this reason it has not been possible to bring many public buildings (schools, offices, museums, hotels, etc.) into line with fire safety rules. By allowing successive delays, the Parliament has allowed this situation to continue (provisional authorisations are issued), even though this means that the buildings have inadequate safety conditions»²¹².

Venice has only 100 firemen. The commander of the Venice's fire brigade made a proposal to the national fire administration to create a special fire squad: "To extinguish fires, for example, ... 300 horsepower boats of 8.7 to 11 metres in length are used, one tonne in weight. 'Five years are needed to properly train those that pilot them, including an in-depth knowledge of the Lagoon'... with the risk that trained firemen are then transferred elsewhere". The commander underlined the need to complete the fire prevention network. According to the press, "while large parts of the city are covered, there are others, for example Giudecca, that are not at all covered"²¹³.

In early 2019, new fires occurred in the city and the islands, unfortunately also claiming victims. On 26 February, a fire started once again in La Fenice, leaving two theatre technicians wounded.

The site is thus gravely threatened by projects of every type: in the Lagoon there are infrastructure project that threaten major landscape, environmental, hydraulic and morphological impacts; a global plan for the Lagoon is lacking; and Venice faces new building projects and inappropriate restorations while the risk of fires continues.

The Outstanding Universal Value of the site thus risks permanent deterioration.

²⁰⁹ M. ZICCHERO, *I soldi per la rete antincendio di piazza San Marco e Dorsoduro "girati" agli enti in difficoltà*, «Corriere del Veneto», 2017 gen. 22.

²¹⁰ A. VITUCCI, *Stop alla rete antincendio. Città a rischio "Rete antincendo ferma, città a rischio"*, «la Nuova Venezia», 2017 gen. 22.

²¹¹ *Rete antincendio di Venezia: approvato intervento da un milione e mezzo*, «veneziatoday», 2018 ott. 11.

²¹² www.comune.venezia.it/it/content/rete-idrica-antincendio-veneziana-e-burano

²¹³ F. FURLAN, *"Venezia città fragile. Serve un nucleo speciale dei vigili del fuoco"*, «la Nuova Venezia», 2019 apr. 18.

As we have seen, in response to recommendation no. 8, the *2018 Report* (p. 87) mentions the *Update to «The Morphological and Environmental Plan of the Venice Lagoon»*, but it fails to say that this *Update* has been rejected by the VIA (EIA) Commission of the Ministry of Environment. *2018 Report* (pp. 87-88):

«one of the leading plans provided for under Italian legislation, ... carried out on behalf of ... the Interregional Office of Public Works, by CORILA ..., with the coordination of the concessionary Consorzio Venezia Nuova ... The Update to the Plan was presented in a public meeting held on 15 December 2016. On 12 January 2017, the Office of Public Works announced that it would also take into consideration observations received up to 30 days after the original deadline established. After examining all the observations received together with the proceeding authority, the Office of Public Works transmitted its rebuttals to the Ministry for Environment, Land and Sea Protection and to the EIA and SEA Commission in Letter No. 18389 of 03/05/2017. The voluminous body of technical documentation and opinions expressed by the competent ministries with regard to the **SEA** procedure can be consulted on the website of the Italian Ministry for Environment, Land and Sea Protection (in English): http://www.va.minambiente.it/en-GB/Oggetti/Documentazione/1446/2023i_aggruppamentoID11031. The Italian Ministry for Environment, Land and Sea Protection and the Italian Ministry of Cultural Heritage and Activities and Tourism jointly issued Decree No. 101 of 21/03/2018 containing its opinion on the “Update to the Plan for the Morphological and Environmental recovery of the Venice Lagoons. The Office of Public Works issued Letter No. 16518 of 18/04/2018 inviting Consorzio Venezia Nuova to prepare the necessary amendments and addenda to the plan concerned in accordance with the observations contained in the aforementioned opinion. The review of the update is still underway and is due to be completed by the end of 2018. The adoption process of the Plan should be completed by mid-2019».

The decree of the environmental impact assessment VIA (EIA) requires the «overall revision of the Plan»²¹⁴. The rejection of the Plan had a large echo in the press²¹⁵.

In fact the rejected *Update* of the *Plan for the Morphological and Environmental Recovery of the Venice Lagoon* completely sabotaged the existing Plan. It would have completely thwart the restoration of the Lagoon’s equilibrium, a key objective of the Special Laws for Venice: «we cannot foresee a halt to and reversal of the degradation of the morphology due to local pressures» the Director of CORILA, the research group, has publically claimed.

Instead, it is claimed that the only realistic approach is to «slow erosion» and undertake «local remedies», in other words, partial rather than the systemic actions that could reactivate functional processes. The *Update* of the *1993 Plan* affirms: “it is useful to define the arrangement (of the Lagoon) in functional terms, negotiating a process of (dis)equilibrium between ecology, morphology and uses». Instead of reestablishing the Lagoon’s equilibrium, the Plan substitutes the goal of a «negotiated disequilibrium».

This *Update* gives little attention to many fundamental issues for the Lagoon: erosion and port traffic and the question of compatibility of large ships navigating in the Lagoon (the Plan should instead provide instruments to address these issues); it ignores the issue of tourism, whose pressures on the Lagoon will grow in coming years; it ignores the persistent issue of clam fishing (now focused on an alien species of clam) whose methods disrupt the Lagoon’s bed, its waters and its biodiversity and

²¹⁴ www.va.minambiente.it/it-IT/Comunicazione/DettaglioUltimiProvvedimenti/1302.

²¹⁵ R. BRUNETTI, *Laguna, il ministero boccia il piano morfologico*, «il Gazzettino», 2018 mar. 27; G. BERTASI, *Roma boccia il piano della Laguna. Era costato 10 milioni di euro*, «Corriere del Veneto», 2018 mar. 27; A. VITUCCI, *Stop al piano della laguna, troppi errori, è da rifare*, «la Nuova Venezia», 2018 ott. 3; M. ZICCHERO, *Linetti congela il Piano della laguna “Era tutto sbagliato, una scatola vuota”*, «Corriere del Veneto», 2018 gen. 11; A. VITUCCI, *Laguna, nuovo piano in 12 mesi. La promessa di Linetti: tempi brevi e costo zero. Il nodo del riequilibrio*, «la Nuova Venezia», 2018 mar. 29.

increase the grave loss of sediments; it ignores the problem of the fish farms (*valli da pesca*) that have closed off and modified vast areas of the Lagoon for private use; it gives little attention to bringing back to the Lagoon rivers that were diverted away from the Lagoon in the times of the Venetian Republic due to concerns about sedimentation – now that the opposite problem, erosion, is paramount, it is necessary to reintroduce the rivers so that they can bring sediment and allow the growth of reeds that will produce an organic substrate.

The *Update* would have moreover cancel the objective of mitigating the impact of the Malamocco-Marghera Channel: the current *1993 Plan* highlights that this Channel is “the origin of a process of movement of sediments that leads to strong erosion of the Lagoon’s beds”. The *1993 Plan* in fact foresees the closure of the first East-West stretch of the Malamocco-Marghera Channel and would instead restore the Fisolo Channel, which once fed the whole network of natural channels in the central Lagoon. Restoring tidal flows to the Fisolo Channel would reactive those secondary channels and lead to a recovery of the entire area’s hydraulic functions. Only ships less than 240 metres long could use the reactivated Fisolo Channel, and this is the reason this measure of the current Plan would be abandoned. The Marghera and Canale Vittorio Emanuele cruise ship projects would block the restoration of the Lagoon’s equilibrium.

Instead of reducing the impact of the Malamocco-Marghera Channel – which has made the central zone of the Lagoon a crater – the *Update* proposes a project called “Biomorphological configuration”. This foresees the creation of vast salt marshes in areas where salt marshes never existed - and where they would not be able to maintain themselves, due to the hydrodynamic conditions. These so-called salt marshes would in fact have to be defended by «perimeters... in geogrills filled with stones» (and thus, they would not be salt marshes). The construction of fake and unnatural salt marshes along the Malamocco-Marghera Channel, protected by stone barriers, would completely alter the Central Lagoon, make permanent the original cause of the Lagoon’s instability and would waste a huge amount of sediment, about two million cubic metres, that could be precious elsewhere.

Instead, the restoration of the Lagoon’s hydrogeological equilibrium should continue to be the primary, unrenounceable objective of the environmental plan. It is possible to plan artificial intertidal forms with the same functionality and structure as real salt marshes, it is possible to protect existing intertidal systems with natural engineering, respecting their characteristic, regenerating properties, with attention to the identity of place and the functional meanings of the forms and their location.

Lorenzo Bonometto, founder of the Venice Society for Natural Sciences, has recently prepared a feasibility study, published by the Veneto Institute of Sciences, Arts and Letters²¹⁶, to restore the hydraulic and morphological functions of the Central Lagoon: channelling and using the great energy produced by shipping instead of mechanically opposing it (Fig. 110).

The actions Bonometto proposes could dissipate the energies produced by the passage of ships, transforming them in creative rather than destructive ways. In addition to the reopening of the Fisolo Channel, he proposes the creation of underwater knolls that would have several objectives: a. channel water flows, avoiding their dispersion and encouraging the reopening of secondary branches; b. halt transversal currents that fill channels with sediment; c. slow the formation and spread of wind-formed waves, which are now aggravated by the increased depth of the Central Lagoon and which stir up its sediments; d. contain sediments in the water so they are not lost at sea and instead are redeposited in the Lagoon; e. channel waters pushed by the north-east bora wind to recreate a network of minor channels; f. reorganise the open expanse of water expanse into distinct areas.

Rebalancing the Lagoon is still possible. It is not clear why Provveditore Linetti (Interregional Office for Public Works, *Provveditorato Interregionale per le Opere Pubbliche*), after defining in the Press *Update*: «in fact, an infrastructure plan, not regulator of the Lagoon»²¹⁷ has entrusted his “overall review” to the same person who produced it.

²¹⁶ L. BONOMETTO, *Scenari possibili per il riequilibrio della Laguna centrale. Studio di fattibilità e linee operative per la pianificazione e progettazione degli interventi morfologici nelle aree attraversate dal Canale dei Petroli*, in *La Laguna di Venezia e le nuove opere alle bocche*, Venezia 2017 (Commissione di studio sui problemi di Venezia, III), pp. 61-90.

²¹⁷ M. ZICCHERO, *Linetti congela il Piano della laguna “Era tutto sbagliato, una scatola vuota”*, «Corriere del Veneto», 2018 gen. 11.

The point is that the Lagoon – under the authority of the Ministry of Public Works and not, as it should be, of the Ministry of the Environment - has always come to be considered not a cultural and natural environment to be preserved and used compatibly, but as a great resource to be exploited and in which to place infrastructures for economic development, to the bitter end. A conflict that has lasted 60 years, from the excavation of the Malamocco-Marghera Channel.

As required by the new Procurement Law (*Codice dei Contratti*)²¹⁸, a public debate is needed, in which all the competent subjects, including independent technicians and associations, collaborate – as has already happened (albeit with work already commenced) with the insertion of landscaping work on the mouths of the Mose.

p. 88 *2018 Report*: «**2. The Heritage Impact Assessment (HIA) for the World Heritage property “Venice and its Lagoon”**».

It «has been allocated 100 thousand euro in funds by the Italian Ministry of Cultural Heritage and Activities».

The Heritage Impact Assessment (HIA) has not been prepared.

In conclusion: the 2018 Report is silent on almost all the major works planned for Venice and in the Lagoon.

²¹⁸ D.Lgs. 18 aprile 2016, n. 50.

DECISION 41 COM.7B.48, RECOMMENDATION NO. 9

«Also acknowledges progress made towards the completion of the Mose defence system and as the State Party to provide detailed and updated information on this project, including its management and maintenance systems»

The first Report that the State and the Municipality had to prepare (*Report on the State of Conservation of "Venice and its Lagoon" UNESCO World Heritage Site*, 2014) wrote: «Currently, the construction of Mose is at a very advanced stage. It is scheduled to be completed and in operation by 2016».

The last *Report* (p. 91) wrote: «the system will undergo testing and commissioning to ready it for the final hand-over to the State, which is due to take place in late 2021». Very "late 2021" indeed: the deadline was 31st December 2121.

The sentence (*Report*, p. 90): «From 2021 onwards, floods reaching over 110 cm will activate the Mose mobile barrier system, which is designed to protect Venice and its Lagoon from high tides over two metres» is superseded.

At present there is no forecast for the construction completion data, that in any case will be after the end of the 2021, in addition 3 years of commissioning and testing of the gate system are foreseen to be operative. The hand over to the State will be after the end of 2024 but no completion date is anticipated.

The *2018 Report* (p. 91) states: «In normal conditions they sit on the seabed in mouths of the inlets and have no visual impact or effect on the flow of water between the sea and the lagoon».

This sentence does not reflect the real situation. The interface structure of the mobile barriers the artificial island at Lido inlet and the emerged reefs at Lido, Malamocco and Chioggia have changed the landscape of the inlets, in addition the excavations done for the installation of the concrete caissons supporting the gates had increased the hydraulic radii of the inlets with the consequent increase of the exchange of the water flow sea/Lagoon and its impact on the hydro geological impact.

The completion of the work has already been delayed by damages at the concrete caisson, the unforeseen settlement of the emerging interfaces of the barriers (at Malamocco inlet 9 cm in three years have been measured), rust on pipes into the underwater tunnel and some significant components of hinge/joint components; during the first tentative of rising the gates at Lido north barrier some problems have been raised, two gates are not in the final closure position for the presence of sand under the gates and some damages to the structures have been reported. Recently, during the rising tests of gates at Lido south, linkages of air/water at the activation valves has been experienced and a check of the over 900 valves for the whole 4 barriers will be required. As unique case in the history it is necessary to start the maintenance and repair of the gates and relevant equipment before the completion of the works. For the maintenance of the 21 gates of Lido north barrier 3,5 years have been planned with a budget of 18 million of Euro.

The *2018 Report* (p. 91) states: «Monitoring is currently being carried out to study the impact of the system on the environment as well as the modifications to which the lagoon ecosystem is naturally subject».

The sentence is not correct as the excavations at the inlets has changed their hydraulic radius and modified significantly the water exchange sea/Lagoon.

For other very serious critical elements of the Mose we attach the note: *Suitability of the Mose barrier system to protect Venice from extreme tides*, by Enzo di Tella²¹⁹, designer of the *Paratoia a Gravità* system:

«Suitability of the Mose system to fulfil design specifications with the design sea level, not considering the effect of sea level increase due to climatic changes which will bring to more demanding extreme conditions, has been questioned because of major design criticalities disclosed in project design official documents, recently published in internet, and of failures and functional problems occurred in construction phase, which refers mainly to:

²¹⁹ Designer of the following projects: *Gravity Gates for protection of Venice's Lagoon from high tides* e del *Floating Foreport for Cruise Ships*.

- Dynamic behaviour of tilt gates and structural design of steel gates.

The structural design of steel gates and hinges-connectors depends on dynamic behaviour of gates subjected to the waves action. The dynamic analysis of the gate barriers shows two fundamental issues: the first one is related to the identification of the gate dynamics performed “only” on very small scale model tests and the second one is related to the presence of dynamic instability or sub-harmonic resonance (this instability has been highlighted also in the study of Principia performed on behalf of Venice Municipality the 2009 for the Malamocco barrier in wave conditions the has occurred two times during two years of monitoring waves conditions at the same inlet), the instability is also confirmed in the results of model tests disclosed recently. The tests on very small scale of the complete barriers are performed according to Froude law, in this similitude the effect of viscous effect, depending on Reynolds law are not represented correctly: this results as the gates of the barriers are moving in a fluid more viscous than the real one (technically is named scale effect), the effect is more big as less the scale model is. For the above mentioned reasons the test results are not reliable and cannot provide useful data for the design; in addition the presence of the dynamic instability is a further issue for the reliability of the test results but mainly for the design of the system as, in this case is not possible to use mathematical model for the dynamic analysis as highlighted by Principia that was not possible to model the Malamocco barrier as anticipated (the mathematical model can highlighted the presence of the sub-harmonic resonance but cannot reproduce the dynamic behaviour of the gates). Recently a report of model scale 1/30 and 1/10 has been disclosed by CVN; the scope of the report, according to the authors, is to demonstrate that the scale effect does not exists. The analysis of this report shows serious faultless in the planning, the construction of models of the basins test, in the construction of gate models, the method of measure of the wave pattern on the gates and in the execution and analysis of tests. These comments are presented in a report prepared by the engineers Vincenzo Di Tella, Gaetano Sebastiani and Paolo Vielmo. The report has been sent the “Provveditore delle Opere pubbliche del Triveneto” ing. Linetti (the State authority that manage the construction of the project) and the report sent to CVN has been commended by the CVN’s Consultant professor Foti. Professor Foti has acknowledged that the basins are not suitable to test the gates in the used scale, and that is not possible to simulate the wave pattern acting on the gates, but has considered acceptable only the free oscillating tests performed to calculate the decay curve, and as conclusion has recommended to perform the tests on the as built barriers in real seas. Di Tella, Sebastiani and Vielmo have commented the report and the conclusions of Professor Foti highlighting that, first of all, the oscillations in the basins used cannot be considered free as the waves generated by the oscillating gates are reflected by the wall of the wave generator in front of the gates and the beach behind the gates and return to the barriers that are not free to oscillate, second that the viscous effect must be considered for all the frequencies of the wave spectra: only tests with the same design spectra giving the same results for gate motions and forces acting on the hinges could assess the absence of the scale effect. As the performance of such tests is not possible for the used scale of basins and gates the results are useless and misleading, in addition it was noted that, in case of sub-harmonic resonance it is very risky to perform tests with the prototype without the previous check of the dynamic behaviour of gates. This report, after more than one year, has not received an answer, from the local press it has been reported that two Universities have been charged to investigate on the matter but up to now their conclusions are not known. The presence of the dynamic instability of the gates (sub-harmonic resonance), that has been completely disregarded in development of the project, does not allows to define the real behaviour of the gates and consequently reliable premises and loads for the structural analysis and, of course, the reliability and safety of the structures.

- Procedure for the assessment of the design loads for the structural analysis.

The gate is modelled as a fix body, in the mean working condition, subjected to the static loads of the internal pressure necessary for displacement of the ballast water and the hydrostatic loads of water inside and outside of the gates; such a modelling disregards the extreme positions of the gate with reference to the waves, the dynamic loads of the waves and dynamic loads of waves and the inertial forces of the structure of the gates and equipment and the water ballast inside the gate: these loads are added and subtracted to the hydrostatic loads on the gates wall and significant for the structural analysis. On the basis of these documents it is possible to assert that a real structural project for the gates and the groups hinges/connectors does not exist.

– Complexity of activation principle of gates and relevant equipment.

The Mose gates counteract the differential pressure due to difference levels sea/Lagoon with their buoyancy that are positioned toward the Lagoon, therefore as the sea level increase the gates tend to immerge and the water ballast must be displaced with enormous volumes of compressed air in real time to the tide level; this operative concept requires a monitoring and control system for each gate (78 total), brings to an overall great complexity and poses considerable reliability and energy consumption problems; in addition a costly continuous maintenance is required that can hamper system availability when needed. The system complexity and an inappropriate material selection has already shown heavy corrosion to some hinge/connector components and of compressed air piping that must be replaced after few years from the installation and before the starting of their functioning. A study awarded from CVN to RINA (*Registro Italiano Navale*, Italian Naval Register) has assessed that the operating life of some critical components of groups hinge/connectors is 15 years instead of the 100 years design life.

– Maintenance and repair costs.

The massive concrete foundation caissons and of the layout of drive and control equipment placed in subsea dry tunnels inside the caissons are not reversible (against the design Venice special law that requires to be gradual, experimental and reversible), the barriers cannot be modified or re-installed to a different level on sea bottom in case of excessive settlement (sinking) or mean sea level increase; all possible modification or repair tasks will require subsea special purposely built equipment with unpredictable cost, marine operations and impact on port accessibility: a single failure in a concrete caisson wall, experienced during its installation, has been repaired in one year time, at a cost of about 12 million Euro

Routine maintenance costs are determined by the system complexity and by the need of recovering each single gate and hinge-connectors for refurbishment and repair with special equipment and marine operations. Without considering the impact on port traffic, presently maintenance costs have not yet been assessed, but very large figures have been anticipated (80-100 million Euro per year). The first gates installed at Lido North in 2013 must be removed for maintenance before starting of operations, are affected by heavy rust and marine grow and must be repaired as during the first rising test have suffered some damages and during the immersion some gates have not reached the respective final position due to heavy accumulation of sand. This is an unique case in the history where maintenance is required before its completion: only for removal and repair of this barrier 3,5 years and a cost of 18 million of euro are foreseen.

– Issues that have arisen before completion.

The huge settlement into sea bottom (9 cm) of the Malamocco interface caissons has measured in about three year (3cm/year) a value expected in the system life of 100 years. After this event, reported on news papers, there are no more information as well as possible settlement of the caissons supporting the gates. Further uncontrolled increase of a possible differential settlement between the interface module and contiguous foundation modules would bring to the flooding of tunnels and loss of the whole barrier. The interaction of barriers system with sea bottom sediment dynamics, modified by the system itself, may bring, during the operative phase, to consistent sand accumulation onto the gate hinges

such as to prevent their recovery in “close” position and produce structural failures, as experienced in recent preliminary tests; lacking an effective equipment to control sediment setting on gates and foundation caissons, will require continuous and expensive dredging of the accumulated sand and sea bottom “re-shaping” works after most of the activations for significant tide phenomena, with direct impact on system availability, operating costs and port accessibility.

5. Final considerations

These unsolved design technical criticalities, brought in by the basic system configuration choices adopted in early eighties are such as to hamper (or preclude) the efficacy of Mose system to protect Venice from large and extreme tides. The system is not reversible i.e. it cannot be removed and modified for different possible climate changes that can be experienced during its 100 years life, and the unexpected measured settlement at the concrete interface of the underwater tunnels anticipate a rapid obsolescence of the protection system.

In the present Mose project scenario, the system, for which 5.5 billion Euro have already been spent, is slowly approaching the completion continually delayed, but its suitability to safeguard the city in all the foreseen operating conditions is not granted and is not assured by the new managers of the Consorzio Venezia Nuova, appointed by Italian Government after the explosion of the multi-million corruption scandal. They have confirmed in public communications of being charged with the completion of the Mose construction only, and not to endorse the technical content of the design and the responsibility of the performances and efficacy in safeguarding Venice from extreme tides.

It has to be noted that presently there are several working systems able to protect large area from sea tides having certified costs of constructions, operation and maintenance considerably lower and positive performance records; in addition it's important to point out that during the evaluation of alternatives performed by the Venice Municipality, a different and much more simple concept of tilt gate barrier, based on recoverable (reversible) supporting structures had been proposed; the basic configuration of this system gave safe and reliable solutions to all the technical issues troubling Mose development and future life: this alternative was rejected by most of the former Institutions supporting the “Official Project”.

In these conditions Mose project is going to be completed without the confidence of a proper design and to meet the safeguard of Venice Lagoon with a reliable forecast of future maintenance and operation costs».

The *2018 Report* (p. 92) also mentions the difficult issue of maintenance for the Mose system, without noting the problem of its costs – 80 to 110 million Euros per year. The *2018 Report* does refer to the issue of competence: with the suppression of the former Venice Water Office (the *Magistrato alle Acque*), the *2018 Report* states that its role should be «without delay» be given the Metropolitan City.

Italia Nostra instead hopes that the decision to suppress this historical office – whose competence was exclusively that of the Lagoon – be re-imagined: a new office should be created, but under the Ministry of Environment and not, as was formerly the case, under the Ministry of Infrastructure.

The *2018 Report* (p. 91), regarding the Mose, mentions the *Centro Previsioni e Segnalazioni Maree*: «The Tidal Prediction Centre of the Municipality of Venice constantly monitors weather and sea conditions and provides daily updates on the lagoon sea levels as well as delivering a highly efficient service of information and communication (by phone, newspapers, website, bulletins, emails, apps, information points and social networks) and warnings (through sirens and text messages)».

A few lines for a very important Institution for the city of Venice - the *Centro previsioni e Segnalazioni Maree (Tide Forecasting and Reporting Centre)* (henceforth *Tide Centre*)- that the current mayor has unfortunately changed a lot. The *Centre* was an institution of excellence in Venice and it was awarded of a special mention from of the Ministry for Public Administration and Innovation²²⁰.

²²⁰ *Il Centro Maree guadagna menzione speciale del Ministero per l'Innovazione*, «lavocedivenezia.it», 2010 mag. 17.

In 2016, nevertheless, press announced: «Farewell to the *Tide Centre*, Brugnaro closes it»²²¹. Venice City Council, in fact, approves the shutting down of four Venetian institutions, including the *Tide Centre* and the Laguna Park. «The [Municipal] Administration - explains the Mayor Luigi Brugnaro - aims at the rationalization of the whole system and, following the recent legislation on transparency and anti-corruption, aims to saving money and to achieve a bureaucratic and administrative simplification». As a councillor explains: «the administration will be able to perform the same functions, bringing them, however, inside the municipal machine, thus enhancing and increasing the staff's efficiency»²²².

The outcry is general but useless. The *Tide Centre* becomes part of a municipal office, including other functions such as civil protection and municipal police, directed by the head of the Venice Municipal Police. «This is not a spending review - says Paolo Canestrelli, historical director of the *Centre*, who retired seven months ago – it's destroying a technical organization that has allowed different institutions to collaborate, a precious scientific support»²²³.

A letter, dated 18 July 2016, from the Director of the *Tide Centre* Luigi Alberotanza to the Mayor remains unanswered: Alberotanza's goal was «the creation of a Single Centre for predicting the tide level by pooling the skills and resources of real institution, ex Mag (istrate) to Waters, ISPRA, CNR-ISMAR, CVN».

Despite many agreements stipulated after the dissolution of the institution, there are now many protests due to problems in forecasting the population alert. Just recently, during the high tide of 4 April 2019, the Centre had alerted the citizens for a 120-125 cm tide but the water continued to rise and reached 134 cm, without properly warning the Venetians. Five centimetres more makes a big difference for those who live on the water, especially for shopkeepers²²⁴. The chief of the Municipal Police incredibly replied: «my choice ... we risked scaring the citizens»²²⁵.

The *2018 Report* (p. 93) devotes a paragraph to the «Territorial demands and requirements». «Finally, with regard to the architectural (partly already under realisation), landscape and naturalistic aspects of the works at the port inlets, a public discussion was opened that allowed for the identification of the territorial demands and requirements. In particular, the “fundamental” theme of integrating the landscape and environment into the defence works has been revisited».

The new Procurement Law (*Codice dei Contratti*) finally introduces the public debate on major works.

During the summer of 2018, a public debate was held on the “landscape and environmental impact” of the works at the Lagoon entrances (*Inserimento paesaggistico e ambientale delle opere alle bocche di porto*). In other words about the “camouflage” of the great structures of the Mose at the Lagoon entrances (it is a lie that the work is invisible!). A debate that the Provveditore and the Commissioner of the Mose started too late as the works have already began.

Italia Nostra's Observations, as well as observations of independent technicians, experts, associations and private citizens, have led at least to a rethinking of the large volumes in glass and steel already under construction to mask the technical structures of the Mose in a fragile and protected environment such as the Lagoon entrance.

We refer to comments that have been published in n. 1 of the magazine «Quaderni della Laguna» for further information and references²²⁶.

The *2018 Report* (p. 91) exalts the invisibility of the Mose project as it consists magnifica l'invisibilità del Mose, in quanto consta «of a series of 78 retractable modular foodgates... In normal conditions they sit on the seabed in mouths of the inlets and have no visual impact or effect on the flow of water between the sea and the lagoon».

This claim doesn't reflect the true situation. And the affirmation is significant in terms of what is claimed and what is truly the case for the major infrastructure works in the Lagoon. Without

²²¹ *Addio al Centro Maree, Brugnaro lo chiude*, «lavocedivenezia.it», 2016 lug. 19.

²²² *Addio al Centro Maree, Brugnaro lo chiude*, «lavocedivenezia.it», 2016 lug. 19.

²²³ G. BERTASI, *Un punto di domanda sulla futura gestione del Mose “addio cabina di regia”*, «Corriere del Veneto», 2016 lug. 20.

²²⁴ N. MUNARO, «I commercianti in ammollo “i messaggi ci hanno tradito, perso un giorno di lavoro”, «il Gazzettino». 2019 apr. 6.

²²⁵ M.F., *Niente sirene per quota 130. Agostini: “una mia scelta”*, «il Gazzettino». 2019 apr. 6.

²²⁶ <https://www.mosevenezia.eu/ql/>

considering the major impacts that the Mose will have on the environment (for example, a study²²⁷ by Italy's National Research Council determined that it will lead to subsidence, as was foreseen), we will look only at its claimed virtue of invisibility. The photographs (Fig. 106) eloquently show how this huge work has altered the protected landscapes of the Lagoon's outlets to the sea. While Recommendation no. 10 invites the State Party to «sustain in the long term the OUV of the property, its landscape and seascape».

In conclusion, based on the information we have provided above, we note that in the 2018 Report none of the very worrying critical issues that we highlighted is presented.

²²⁷ L. TOSI ET AL., *Combining L- and X-Band SAR Interferometry to Assess Ground Displacements in Heterogeneous Coastal Environments: The Po River Delta and Venice Lagoon, Italy*, «Remote sensing», 8/4 (2016). Eco sulla stampa locale: A. VITUCCI, Il Mose sprofonda, perizia del Consorzio, «la Nuova Venezia», 2016 giu. 16.

DECISION 41 COM.7B.48, RECOMMENDATION NO. 10

«**Further reiterates its request that the State Party update the Management Plan and revise its planning approach in order to sustain in the long term the OUV of the property, its landscape and seascape**»

Report, p. 94 95 it: «The process activated through the verification of the property's state of conservation has allowed an effective consolidation and full cohesion of the management structure represented by the Steering Committee».

This is not the case, as we saw (see pp. 11-13 above).

The Management Plan has not been renewed. And the Steering Committee has not met for over a year.

This recommendation, in requesting the revision of the Management Plan, mentions «**the OUV of the property, its landscape and seascape**». We note that also the seascape of the site is endangered: we recall, for instance, the VGATE project, the multi-mode deep sea terminal (see p. 62 above) off the Adriatic Coast and the coast of the Municipality of Chioggia, that provides – in the sea, between Chioggia and the Regional Park of the Po Delta (a UNESCO Heritage Site) – a road for lorries and a railway!

DECISION 41 COM.7B.48, RECOMMENDATION NO. 11

«**Further requests the State Party to provide a much clearer detailed road map for the way forward, with measurable benchmarks and a detailed Action Plan to deliver what is needed, commensurate with the major threats to the property**»

The City Government (not the State Party) do prepared a road map.

DECISION 41 COM.7B.48, RECOMMENDATION NO. 12

«**Requests furthermore the State Party to submit to the World Heritage Committee a detailed report on the state of conservation of the property and the implementation of the above, including a detailed road map on the way forward, by 1 December 2018 for examination by the World Heritage Committee at its 43rd session in 2019, with a view to considering, if adequate progress in the implementation of the above recommendations has not been made, the inscription of the property on the List of the World Heritage in Danger**».

This *2018 Report* has been prepared – not by the State Party but only by the City of Venice, without the involvement of other bodies. The Municipal Council of Chioggia, as we have noted above, has complained of its lack of involvement of the fact that it was not even allowed to see a draft before the report was sent to UNESCO. And as we have noted, the 2018 Report was not discussed in the Municipal Council: City Councillors (as well as the press and other associations) only received a copy following the freedom of information request made by Italia Nostra.

The *2018 Report* thus represents the vision of ONLY the City Government.

And it presents a view of reality in which the major problems are not properly described; nor are the major infrastructure and development projects impacting the city and the Lagoon are properly presented.

Decision 41 COM.7B.48, Recommendation n. 8 expressly requested this presentation: «**Also reiterates its request that the State Party submit, in conformity with Paragraph 172 of the *Operational Guidelines*, details of any newly proposed projects, together with all relevant cumulative Heritage Impact Assessments (HIAs) and Strategic Environmental Assessments (SEA), with a specific section focusing on their potential impact on the OUV of the property**»).

Conclusions.

Venice and its Lagoon is endangered by developments projects which are increasing daily. Only UNESCO²²⁸ can try to save the OUV of the site, and try to avoid the irreversible loss of a thousand years of history, culture and art and 6,000 years of prodigious natural evolution. No further extension should be conceded: the World Heritage site *Venice and its Lagoon* should be immediately included in the list of endangered sites, in order to get to a stricter protection of the site itself.

²²⁸ Based on all that we have presented, we conclude with a preliminary, modest proposal to start: it is necessary that the Unesco Office in Venice does not depend on the City but has its own autonomy. The advantages for the protection of the site would immediately be evident. We draw UNESCO's attention to comments the Mayor of Venice made to the press: «We host the office and UNESCO and pay the costs, 1.4 million only in recent years. And yet UNESCO sends us a stop signal from Istanbul. I say: we stopped the Turks at Lepanto, if you want to talk to us come to your office here... We're threatened by an organisation that changes the names of the holy sites of Jerusalem. Undignified. I don't accept judges and controllers, only proposals. At home, we do the sums ourselves». When asked the possible ban on large cruise ships, the Mayor replied: «Let them ban them where they are». And asked about the possibility of leaving UNESCO, the Mayor replied that it's not important: «it's UNESCO that uses Venice for publicity, not the other way around. UNESCO needs to be saved, no Venice». G. SALVAGGIULO, *Il sindaco Brugnarò: "A Venezia tassa per turisti mordi e fuggi"*, «www.lastampa.it», 4 Nov. 2016.