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Italia Nostra, which is the oldest National Association for the protection of Italy's cultural heritage and environment, sent in 2011 and 2012 three letters to UNESCO, in which this Association pointed out to the World Heritage Committee that the prerequisites to maintain the site *Venice and its Lagoon* in the World Heritage List no more existed, because of the lack of care of this site by the Italian State and by the local Administrations.

As a consequence, UNESCO (Decision 38 COM 7B.27, 2014, Doha), sent to Venice a Mission (which took place in October 2015) and in the subsequent Decision 40 COM 7B.52 (2016 Istanbul), expressed some recommendations to be followed by the Italian State.

The following Decision 41 COM.7B.48 (2017, Krakow), examined the 2016 Report sent to UNESCO by Venice Municipality, erroneously felt that significant progress had been accomplished, confirmed the previous recommendations and expressed some new ones. A delay of two years was conceded for their implementation.

The Draft Decision 43.COM/7B (preliminary version for 43^a Session to be held next July in Baku), considers that replies provided by Venice Municipality in the 2018 Report as satisfactory, concedes a further year of test and requests an other Report by the Italian State «with a view to considering the possibility of inserting the property on the List of World Heritage in Danger».

Our Association studied with care the 2018 Report by the Venice Municipality and prepared a “Dossier” of 80 pages, in which each supposed improvements of the site is carefully examined and denied. According to our Association, no project exists to get Venice, the Lagoon and the remaining inhabitants out of the current very critical situation. Our Association also proved that the great majority of the recommendations related to Decisions had a quite minimal concrete follow up.

The new delay that WHC seems ready to accept with the Draft Decision 43.COM/7B appears to be inadequate with respect to the dramatic situation of the site.

We are convinced that the real and most important reason justifying this resolution consists in lack of information on the real, actual situation.

The Draft Decision 43.COM/7B:

«3. Notes the efforts of the State Party and all the institutions involved to work collaboratively to protect the Outstanding Universal Value (OUV) of the property, and that progress has been achieved towards the implementation of the recommendations put forward in Decisions 40 COM 7B.52 and 41 COM 7B.48, and those of the 2015 mission». The 2018 Report on the state of conservation presented in December 2018 has not been prepared by the State Party but only by the City of Venice, without the involvement of other bodies, excluding notably the Mayor Chioggia, the second city of the Lagoon, who not only did not participate in its preparation but could not even read it before it was delivered to Unesco. **The 2018 Report**

was not approved by the Steering Committee in any of its meetings, but **is the work only of Mayor Brugnaro of Venice.**

«4. Acknowledges the preparation of the ‘Climate Action Plan’, the ‘Water Plan for the City of Venice’ and the ‘Environmental and Morphological Plan for the Lagoon of Venice’ ...» but is unaware of the fact that **Venice is the most polluted Italian port city** and the third most polluted European city because of cruise traffic (Transport & Environment, June 2019). The Blue flag agreement between cruise companies and the Municipal Administration of Venice, promoted in the Mayor’s Report as a success, commits companies to use fuel whose sulphur percentage should not be above 0.1 %. This percentage is **100 times above** the one allowed, for 15 years, in fuels used on the mainland. And Moreover, **no abatement of emissions is foreseen**, whereas it is for vehicles. According to 2015 Reactive Monitoring Mission the airport «[has] **reached carrying capacity as well as the limit of compatibility with the maintenance of the heritage values of the Lagoon**», Before 2025 it will double and before 2035 it will triple, bringing the number of passengers from 11 million to 16 million. In Venice the climate-changing emissions are in continuous, dramatic increase;

«5. Also acknowledges the ‘Project of Territorial Governance of Tourism in Venice’ ...», but it seems that they are not aware that the two major measures announced by the Mayor’s Report for tourism management, the turnstiles (barriers to deviate – and not to reduce – the flow of tourists to less crowded areas of the city) and the relocation away from St. Mark of tourist boats (which carry large groups of tourists from seaside resorts located in other municipalities), **have already been revoked** because they have proven to be a failure. It seems that they are not aware that the decision to limit hotels around Venice concerns **only a small part of the territory of the Venice municipality** (not Mestre and not Marghera on the mainland, not the seaward islands of Lido or Pellestrina, not Murano or the Giudecca or Sant’Erasmus in the Lagoon, etc.). Plus, the block on new hotels can be **overcome by derogations**. Bed places in other facilities than hotels (mostly in apartments) almost doubled between 2013 and 2017, and there are no houses for rental for residents. **Venice loses about 800 inhabitants per year** the negative impacts of tourism pressure is growing;

«6. Welcomes the alternative navigation path that has been identified for the relocation of ships with a gross tonnage of over 40,000 tons to Marghera, and the support for the Venetian cruise industry through construction of a new terminal in Marghera ...» but is unaware that **any alternative navigation path has been identified!** Besides the Mayor’s 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, and **among them there is not Marghera project!** It also seems to be content with the fact that «the alternative navigation path» (which doesn’t exist) «will allow large ships to reach the Venice Maritime station without passing through the San Marco Basin and the Giudecca Canal», forgetting that Decision 40 COM 7B.52, Recommendation no. 6 (on the basis of the outcomes of the 2015 Reactive Monitoring Mission) 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». So **Draft Decision 43.COM/7B** is in **strong contradiction** with **Decision 40 COM 7B.52** and **Decision 41 COM.7B.48**. The text of the Draft Decision does not consider the numerous scientific studies that show without a doubt that allowing large ocean-going ships to transit through the Lagoon damages its 6000-year-old morphology, meaning that the Lagoon is being rapidly eroded and its ecosystems are being lost – even

though UNESCO itself considered that the protection of the site's salt marshes to as important as the protection of Venice's **palaces and churches** (in Criterion V of its inscription of Venice and the Lagoon as a World Heritage Site);

«7. Also notes the pending completion of the MOSE defence system» being completely unaware of the tremendous critical aspects of the project, as for instance the **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). 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. 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;**

«8. Further acknowledges the initiative of the State Party for updating the Management Plan of the property, which is an essential tool for sustaining its OUV, and its landscape and seascape setting, and requests moreover the State Party to incorporate the detailed road map and its measurable benchmarks within the updated Management Plan, additionally to supplement the document with a planned management strategy for the potential buffer zone of the property ...»; but to our knowledge the Management Plan has expired in 2018; moreover the Site Referent (Municipality of Venice), **disregarding the non-favourable opinion of the Ministry of Cultural Heritage and Activities**, 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);

9. «Also encourages the State Party to strengthen its monitoring system for vulnerability of heritage areas to climate change and disaster risk, and continue developing and implementing mitigation measure to reduce their risk to the OUV of the property», but **there are not effective measures**, please see below;

«10. Notes with concern the lack of regular communication of the State Party with the World Heritage Centre and the Advisory Bodies, and reiterates its previous requests to the State Party to submit, in conformity with Paragraph 172 of the Operational Guidelines, details of any newly proposed projects, together with all relevant Heritage Impact Assessments (HIAs) and Strategic Environmental Assessments (SEA), in due time prior to irreversible decisions and implementation, including a specific section focusing on their potential impact on the OUV of the property, and addressing potential cumulative impacts», The Heritage Impact Assessment (HIA) has not been prepared and the 2018 Report **is silent on almost all the major works planned for Venice and the Lagoon.** Venice and its Lagoon is endangered by developments projects which are increasing daily, for instance the LPG storage area in Chioggia or the embankment of the Malamocco-Marghera Channel (called the «Oil tanker channel» by many Venetians) and others which our Dossier presents;

11. Finally requests the State Party to submit to the World Heritage Centre, by **1 February 2020**, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 44th session in 2020, **with a view to considering the inscription of the property on the List of World Heritage in Danger if the implemented mitigation measures and the adapted management system does not result in significant and measurable progress in the state of conservation of the property»**. Venice and its Lagoon is endangered by developments projects which are increasing daily. Only UNESCO **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.**

In front of this dramatic situation of Venice and its Lagoon, Italia Nostra is convinced that UNESCO has the duty to intervene: the inscription of Venice and its Lagoon in the Danger list, in order to get to a stricter protection of the site itself, appears essential and cannot be further delayed.