



ASSOCIAZIONE NAZIONALE
PER LA TUTELA DEL PATRIMONIO
STORICO ARTISTICO
E NATURALE DELLA NAZIONE

www.italianostra-venezia.org

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In previous letters - of 5 July 2011, 9 February 2012 and 22 October 2012 - our association, which was created in 1955 to protect the country's historical, artistic and natural heritage, signalled to the World Heritage Committee that the preconditions to maintain Venice and its Lagoon on the World Heritage List no longer exist, due to the lack of protection of the site on the part of the Italian government and local administrations.

We are pleased that the Committee, at its 38th meeting in Doha, has concurred with our observations concerning the major infrastructure, navigation and construction projects in the Lagoon of Venice and requested that the Italian government present, by 1 February 2015, a progress report on the state of conservation of the site, and by 1 December 2015, a report on the state of implementation of the Committee's requests.

Unfortunately, the Italian state, the Veneto Region and the city administration focus on short-term aims rather than the protection of Venice, in all its characteristic diversity. Indeed, in these years of economic crisis, Venice has been considered as an opportunity to be exploited rather than an asset to transmit to future generations. In the near future, decisions will be taken that could cause irreversible, damaging transformations to Venice and its Lagoon, given the interests shared by many political forces.

Venice and its inhabitants are at the mercy of narrow economic interests.

Our association believes that only the intervention of an independent institution, one from outside the country, could save this city: a decision by UNESCO could be the only hope for keeping this cultural heritage site, which is unique in the world.

Draft decision *38 COM 7B.27* signals a major step forward for the protection of Venice and its Lagoon, one the Italian government cannot ignore.

We present specific references to the decision in *Annex A*, p. 9, (focusing on the recommendations of UNESCO and on the current state of the Lagoon).

In this first part of our statement, we delineate the main concerns for the conservation of the Outstanding Universal Value of the site and that call for it to be included in the danger list, given a lack of positive action on the part of the Italian government and the city administration.

VENICE AND ITS CITIZENS

a. The matter of tourism and Venetian citizens

After the 1966 appeal by UNESCO and the foundation of the Private Committees for the Safeguarding of Venice, many restorations have been carried out by private sponsors and more by the Italian State, which invested major resources. However, if demographic trends continue, in the coming years the city will be perfectly restored but Venetians will completely disappear. They form the “living city”: without them Venice is doomed to lose its history, traditions and its daily life. To sum up, Venice won’t be Venice anymore.

Currently just fewer than 56,000 citizens live in Venice. However, it is likely that true residents are even less: for fiscal convenience many owners of second homes register them in name of a relative - this happens because there are no checks.

National Geographic Traveller and the National Geographic Center for Sustainable Destinations, with the George Washington University, in the third Destination Scorecard survey, contains the following quote about Venice from one of its experts (in the survey, a panel of 419 experts in sustainable tourism and destination stewardship rated 94 World Heritage destinations): «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, as everyone seems to be trying to get the most out of tourists. The ‘cultural’ visit is therefore limited to the monuments, the churches, and the canals»¹.

b. Venice’s “carrying capacity”

In 1988, a study was carried out to determine the maximum number of visitors that the city could host ². It was prepared by Paolo Costa (then professor of economics of the University of Venice, later mayor of Venice, now president of the Port Authority of Venice), together with Jan van der Borg (a professor of economics of the University of Venice). The city’s “carrying capacity” was determined to be 20,000 tourists a day: 13,000 staying in Venice itself plus about 7,750 day-trippers.

In 2012 our Vice-President Paolo Lanapoppi took in consideration data from several sources to estimate the current number of tourists. In his pamphlet «Dear Tourist» ³ he counted 30 million tourists a year in Venice at the time (as a prudent estimate). His calculations were not accepted then because they were too discordant with official data.

¹<http://traveler.nationalgeographic.com/2006/11/destinations-rated/europe-text/10>

²P. COSTA and J. VAN DER BORG, *Un modello lineare per la programmazione del turismo. Sulla capacità massima di accoglienza del centro storico di Venezia (On the maximum receptive capacity of the historical centre of Venice)*, «Cose informazioni», 32-33 (1988), 21-26.

³P. LANAPOPI, *Dear Tourist*, Corte del Fontego editore, Venezia 2012.

Just some weeks ago, it has been recognised that Lanapoppi was right. Tourists in Venice are currently more than 30 million (and the trend is increasing). Thus, there are 82,192 tourists per day on average: compare that to Costa and van der Borg's study, which set a limit of 20,000. In some days of the year, when seven cruise ships dock and bring 30,000 passengers into the city, the level of 82,192 is easily passed.

c. Citizens expelled: exponential increasing of hotels, B&Bs and second homes

In the *Annuario del Turismo 2014* (Annual Tourism report 2014), the data for Venice are alarming:

year	Sleeping accommodations in hotels (total)
2000	14,340
2010	26,664
2014	29.664

year	Number of five-stars hotels
2000	5
2014	21

year	Number of four-stars hotels
2000	43
2014	116

year	Apartments for rent (not in hotels)
2000	185
2010	1,902
2014	2,727

Research recently carried out by an Australian journalist ⁴ counted 3,128 B&Bs in Venice on the Airbnb portal. The author estimates that an equal number of B&Bs in Venice are advertised on other web-sites or not advertised at all. There would thus be 6,000 apartments that are B&Bs or available for daily rent (out of the overall total of 22,400 apartments in Venice), with a capacity of about 20,000 sleeping accommodations, which has to be summed with the 29.664 beds offered by hotels.

The phenomenon revealed by these data is alarming. Furthermore, in addition to tourists who stay in Venice there are those who stay on the mainland, either nearby or on the coast, and who come to Venice for a day visit. Day trippers are estimated at 20 million: they are the first who could be better managed. They come to Venice in big groups with

⁴<http://insideairbnb.com/venice/>

their own guide, obstructing streets (the “calli”), inciting the demand for cheap & kitsch souvenirs and involuntarily degrading the city.

d. The transformation of restrictions on the use of buildings

How did this process take place? In 1992, the approval of a much looser city plan removed restrictions on the change of use of buildings. Since then, indeed, it is easy to change the use classification of buildings, and this is very attractive for the real estate industry.

In 1993, the local administration cancelled the limits on the commercial use of shops. Before then, traditional stores could not be transformed into businesses inappropriate for the special conditions of the city of Venice. After, there was a *fast food* boom.

Since 1993, in 22 years, almost every week there is a new occurrence where the use of buildings, monasteries and palaces is changed. All with the same aim: becoming hotels, while schools, offices, monastic orders and private citizens are expelled from Venice.

e. Selling off public heritage

This deregulation in the use of buildings has been valuable for city administrators. The City Council, continuously seeking money to fill the holes in its budgets (in the red for millions of Euros), has been able to sell off its most important palaces to buyers who immediately changed their use. But the sales have only temporarily solved the economic situation, while they contribute in a definitive and irreversible way to the impoverishment of the city.

On the eve of the recent city elections, Italia Nostra organised a public meeting entitled: *Sacking Venice*. During the meeting, we presented a list together with a map of the public real estate for sale or recently sold (see fig. 28)⁵. The results speak for themselves.

Along with hotels and B&Bs there has been an exponential increase in second homes, bought by non-Venetians not only out of a misguided love for the city but also as an economic investment: small and medium foreign investors buy small apartments in Venice for speculation or for rent to tourists. This trend continues and Venice is losing its population. Whole blocks are now deserted and it is ever more common that large apartment buildings have only one true resident left.

f. Lack of protection for the city’s architectural heritage: the case of the *Fontego dei Tedeschi*

Le Corbusier defined Venice as «le plus prodigieux événement urbanistique existant sur la terre» (the most stupendous urban creation on earth). The eyes of the world are on Venice.

⁵*Beni comuni: dalla reattività alla proattività*, conferenza tenuta da Andrea Grigoletto durante la conferenza *La presa di Venezia*, Venezia 12 maggio 2015.

The Italian state has advanced legislation for its protection - in the Constitution, the Code for Cultural Heritage and three special laws for Venice. One imagines that the city is perfectly protected, above all its major heritage buildings.

This is not the case.

The most striking case has been the *Fondaco dei Tedeschi*, at the foot of Rialto Bridge, 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 century, 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 cut back 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. From the start, Italia Nostra opposed this operation: transforming a building at the heart of Venice into a luxury emporium (thus, not intended for the 56,000 Venetians) meant increasing tourism. In any case, a large shop could be created with 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: a raised floor in glass and steel above the 16th century central courtyard; a huge terrace on the roof; a hole two stories high in the 16th century loggia to show the escalators behind (see fig. 29).

Italia Nostra opposed the destruction of this palace in the courts, but lost. The project was approved despite planning instruments, laws and the public interest. The judges instead sentenced that a private building could be of public interest if there is “accessibility for the public”. No further comment is necessary.

The case of the Fondaco’s ‘restoration’-destruction is unfortunately not unique. The restoration of Venice’s monumental architecture is no longer a simple action of historical enquiry, but a recreation based on a modern vision. And any protection is left to the discretion of a government official, the *soprintendente*.

An exponent of the government, Undersecretary Baretta, stated: «Venice should not renounce growth, we need to escape from the trap of conservation».

The call to ‘modernise’ the city is seen also in the type of tourism that has invaded Venice. The majority of visitors (75%) do not stay more than one day. They do not have time to get to know the city and understand its history. The day trippers want to consume the Venice experience in a flash, with a quick glance, and the best way is from above: from the height of a new terrace (such as the one of the new *Fontego*) or from the height of a great cruise ship. So for cultural reasons, and not only the physical damage it brings, the cruise industry harms Venice.

THE LAGOON

g. “Venice and Its Lagoon”

The very name of the UNESCO site means that Venice and its Lagoon are inseparable: this is what the Venetians understand (see fig. 30-35 “Venezia è Laguna”) - but not the officials.

UNESCO’s Rapport périodique ⁶ of 2006 defines the environment where Venice was founded as «an outstanding example of a semi-lake settlement» where the peculiar morphology (marked by salt marshes, the “barene”), requires «as much protection as the palaces and the churches».

The Lagoon in fact is not merely an environmental asset but represents the culture and the history of Venice. We are talking here of a single, unitary heritage, a vital communion. To sacrifice the Lagoon for the sake of Venice (as is currently proposed, i.e. by moving cruise ships away from St Mark’s Basin but not out of the Lagoon) would mean sacrificing Venice itself - a disastrous distortion of perspective, an abject failure of historical and cultural understanding.

h. The “*leggi speciali*” (special laws for Venice)

Covering 550 sq.km. the Lagoon of Venice is the largest wetland in the Mediterranean, protected by a range of EU and national legislation⁷.

Italian laws specifically for Venice also safeguard the area, dating back to the first 1973 ‘special law’, which states: «The protection of Venice and its lagoon is declared to be an issue of major national interest. The Republic guarantees the protection of the physical landscape and the historical, archaeological and artistic environment of the city of Venice and its lagoon, will ensure the maintenance of its hydraulic equilibrium, will safeguard the environment from atmospheric pollution and from the incursion of the waters and ensure its socio-economic viability».

The first *Legge speciale* (Special law for Venice) (n°171/1973), moreover calls for «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 special law (n°798/1984) calls for «the restoration of [the lagoon’s] environmental equilibrium».

The third (n°139/1992) calls for the «restoration of the lagoon’s original morphology» and «a halt to [its] deterioration».

Yet political practice has not respected these priorities. Economic concerns are considered the only priorities.

i. The variety of the morphology of the Lagoon

⁶whc.unesco.org/fr/list/394/documents/

⁷It is designated a ‘Site of Community Importance’, and a ‘Special Protection Area’, areas for the safeguarding of biodiversity under EU legislation.

Those who don't know the Lagoon and its multifaceted beauty are liable to think of it as an undifferentiated stretch of water.

But the morphology of the Lagoon is extremely rich and various. From the three inlets from the open sea (Lido, Malamocco and Chioggia) strong channels branch inwards in ever narrower rivulets as far as the ghebi (tidal creeks). These channels draw in and out the tides, ensuring a constant exchange of waters, washing over vast areas of submerged land, shallows, marsh flats more or less at water level, salt marshes barely above it, and clearly emergent islands.

Its 'ecomosaic'⁸, is not a simple, passive bowl of water but an active environment with specific functions and precise dynamics.

l. The salt marshes: an “operational” landscape

The salt marshes notably dissipate the force of the currents, protecting the areas permanently above sea level, and furthermore - a factor of no small importance - are capable of regenerating themselves.

Given their general status between 20 and 25 cm above mean sea level (msl), rising to +45 cm along the perimeters and canal edges, they are subject to cyclical total submersion during the spring tides coinciding with full or new moons, when tides can reach +60/+65 cm: in these periods the vegetation captures sediment and organic detritus carried by the current. Thanks to their ability to adapt, their height above mean sea level has remained constant «through compression where the surrounding sea level falls, through sedimentation where it rises»⁹.

The salt marshes, together with the shallows and marsh flats, the canals and the tidal creeks, form part of the system of interdependent functions that *is* the Lagoon. Without this complex synergy it would be something else.

m. The disappearance of the salt marshes

The salt marshes, however, are disappearing: their total surface area, 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 in 2003 was barely 47 sq.km¹⁰. For comparison, the Lagoon is 550 sq.km so the area of salt marsh has shrunk to a small fraction of the total from being more than half of the area (see fig. 9, 10, 11).

⁸La 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, Parte IV, Il sistema ambientale di riferimento e gli impatti, p. 3, online on the Comune di Venezia website.

⁹L. 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. See also L. BONOMETTO, *Il crepuscolo della laguna*, in *La laguna di Venezia. Ambiente, naturalità, uomo*, Portogruaro 2007, pp. 181-243, online (www.politicheambientali.provincia.venezia.it/publicazioni).

Their erosion has been due to four factors: a. excavation of huge navigable channels (such as the “Canale dei petroli” (“Petrol Channel”); b. shipping; c. motorboats; d. the wind; e. fishing of an introduced species, Philippine clams.

a. the “Canale dei petroli”

The Malamocco-Marghera Canal, known as the “Canale dei petroli”, chiefly serving the oil industry at Marghera, is the Lagoon’s biggest artificial channel. It has been responsible for destabilising the hydromorphology of the central Lagoon. Its existence has had «a devastating impact on the hydrodynamic circulation of the central lagoon and on the evolution of its topography»¹¹.

This artificial channel corrals the incoming tide, which no longer branches out through the natural channels (which have atrophied as a consequence) but now expands by a ‘lamination’ effect over the surface of the shallows.

b. shipping

Other negative effects stem from shipping itself: the transit of enormous vessels causes the displacement of considerable volumes of water; breaking against the adjacent banks, this dissolves sedimentary deposits, some of which are washed back into the canal itself, causing long-run silting there too¹². These processes (atrophy of the natural canals, erosion of the salt marshes and shallows) have made the central part of the Lagoon a deep crater. Over a century «a mean increase in depth of at least a metre has been recorded»¹³ (see fig. 11).

c. motorboats

In the northern Lagoon, freer on the whole from large-scale human meddling and better preserved as a consequence, the surviving salt marshes are nonetheless being assaulted by the wash from motorboats hurtling from their mainland moorings towards the open sea, given the absence of effective speed controls. Lorenzo Bonometto has found that

¹⁰L. 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.

¹¹L. D’ALPAOS, *L’evoluzione morfologica della laguna di Venezia dal tempo del Dénaix ad oggi e sue conseguenze sul regime idrodinamico*, in *Conterminazione lagunare. Storia, ingegneria, politica e diritto nella laguna di Venezia*, proceedings of the Bicentenario della Conterminazione Lagunare conference, Venice, 14-16 Mar. 1991, Venice 1992, p. 73.

¹²The phenomenon has recently been subjected to scientific analysis, see J. RAPAGLIA et al., *Shipping-induced sediment resuspension in the Venice Lagoon, Italy*, «Rapp. Comm. int. Mer Médit.», 39 (2010), p. 790, www.ciesm.org/online/archives/.../PG_0790.pdf; 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), p. 45-56; M.E. GELINAS, *Industrial Ships’ Wake Propagation and Associated Sediment Resuspension in the Venice Lagoon*, master’s thesis, Stony Brook University, New York, 2011, https://dspace.sunyconnect.suny.edu/bitstream/handle/1951/56008/Gelinas_grad.sunysb_0771M_10509.pdf?sequence=1 M. GELINAS et al., *Sediment Resuspension by Ship Wakes in the Venice Lagoon*, «Journal of Coastal Research», 29-1 (2013), p. 8-17.

¹³D’ALPAOS, *L’evoluzione morfologica*, p. 85.

the shrinkage of salt marshes' perimeters is more pronounced in the summer months, «coinciding with the busiest period of motor traffic, exactly the reversal of the natural situation where the winter months were more critical due to the waves provoked by the bora»¹⁴.

d. *the wind*

The wind also contributes to erosion, although it is only in areas of relatively deep water (as in the central basin now) that the wind generates waves of sufficient size to destabilise the Lagoon's bed and disturb sediment. It is only in recent times - with the disappearance of salt marshes - that the winds find no obstruction and blows freely across the central Lagoon.

e. *fishing for Philippine clams*

A further factor destructive to the Lagoon's morphology is fishing for Philippine clams, at one time illegal but now permitted. *Venerupis philippinarum* is a highly productive imported species. It was introduced into the Lagoon in the 1980s, and it has gradually supplanted local molluscs. Its fishing is widespread and employs particularly destructive methods, with powerful motors used to churn up the top 10 to 15 cm of seabed to maximise the catch.

n. The negative sediment balance of 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 adjacent areas). In order to maintain the depths useful for shipping, it is necessary to remove more than 230,000 cubic metres annually from the Canale dei petroli alone (to which we must add further "maintenance" dredging from the sea inlets and other industrial channels).

A further portion of the sediment displaced by the wash from boats, the wind and clam fishing is taken out to sea by the currents: between 500,000 and one million cubic metres a year are probably swept out to sea¹⁵ (see fig. 12).

In this way the sedimentary balance of the Lagoon is strongly negative, and the Lagoon is progressively evolving to a deep sea bay.

Other serious sediment losses are foreseeable over the coming years: some of the projects for rerouting the cruise ships from central Venice would require further excavation of many million cubic metres from the Lagoon.

¹⁴L. BONOMETTO, *La Laguna e le sue barene*, «Villa Frankenstein. The Journal of the British Pavilion», 2 (2010), p. 14.

¹⁵4-500 thousand according to D'Alpaos (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. 256), 700.000 according to the Consorzio (www.salve.it), 800.000 for Sarretta (A. 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).

o. Artificial salt marshes and marsh flats

To remedy the state of crisis in the Lagoon caused by the destruction of its unique topography, the salt marshes in particular, since the 1990s artificial salt marshes were created as replacements.

It is possible to create artificial salt marshes, but it depends where and how, as salt marshes have an important hydrological function.

Notably, in its plan for the excavation of the Contorta Channel, the Port Authority proposed to create artificial marsh flats (“velme”) along the channel to reduce erosion - in reality, these would be artificial banks. The plan would create a barrier that segregates an area of the Lagoon between the new banks, the industrial area of Marghera, the bridge to Venice and the city itself: an area with reduced tidal exchanges that would risk a grave, anoxic crisis. To create the channel and build these marsh flats (i.e. banks), 196 hectares of priority habitat would be lost.

Italia Nostra and its experts presented five detailed comments on the project to the Ministry of Environment. These documents are too long to be included here and can be found on the Ministry’s web site: www.va.minambiente.it/it-IT/Oggetti/Documentazione/1486/2259.

p. The Lagoon: from a protected, cultural environment to a sprawling port

All the discussion presented so far shows that maritime traffic of large ships, whether cruise or cargo ships, is not compatible with the Lagoon. In the last century, the industries at Marghera also were incompatible, but they could not be opposed due to their economic importance.

In the 21st century, the same error is being committed: priority to a short-term vision of economic growth, which today is the port.

Elsewhere, maritime traffic has been moved away from city centres - in Venice, not only does the Port Authority want to bring cruise ships into the Lagoon, but also wants to make the whole central Lagoon a sprawling port and turn the Lagoon’s waterfront into a container park.

In 2014, the Ro-Ro Terminal was inaugurated (for the so-called “highway of the sea”) at Fusina, in front of Venice, with the creation of a logistical platform for containers and a wide berthing area 10 metres deep, created with the excavation of 1 million cubic metres of sediment.

Another project at Dogaletto has not been shelved and there are indications that a further port could be built near San Leonardo, maybe also in the “Cassa di Colmata A” (an area of the Lagoon filled in to expand the industrial area, a project abandoned following a previous generation’s protests).

The government is about to finance the Offshore Terminal for the ever larger cargo ships that can no longer enter in the Lagoon. This will lead to an increase in traffic, with about 2,000 ships a year bringing containers from the terminal to Marghera in the Lagoon.

The cumulative effective of the two projects (Ro-Ro Terminal and Offshore Terminal) could almost double traffic along the Malamocco-Marghera channel (i.e. the Canale dei petroli), a +84% increase reaching about 5,200-5,300 ships per year. With the plans for the alternative routes to accommodate cruise ships, the traffic would further increase and the Canale dei petroli would need to be further widened and deepened and protected by artificial, hard banks. In 2013, in fact, a plan to do this and to line the Channel with great blocks of stone was proposed, though it was later withdrawn following the protests of the scientific community. But we foresee its return.

There can be no alternatives or compromises: the Lagoon cannot continue to exist together with a modern port for large ships.

q. cruise ships and economic returns

The national government, City Council and Port Authority pay attention to jobs and the economy.

But a professor of economics at the University of Venice recently carried out a precise economic analysis of the cruise ship industry: the result is that from an economic perspective, cruise ships bring a net cost, not a benefit. The environmental costs of cruise ship activities total 187 million Euros, while their economic benefits are about 122 million. This doesn't count a series of impacts, such as the deterioration of historical buildings due to pollution (see the Annex), the erosion of the Lagoon and the city's foundations, and above all the grave threat to the health of the inhabitants, in particular those who live near the Maritime Station where the cruise ships dock.