



**We are here Venice ETS**

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TO:

All the permanent representatives to UNESCO and members of the national UNESCO commission of the 2023 UNESCO World Heritage Committee meeting in Riyadh, Saudi Arabia

CC:

UNESCO World Heritage Centre  
ICCROM  
ICOMOS  
World Heritage Watch

VIA E-MAIL

Distinguished members of the World Heritage Committee

We are here Venice ETS is an established local organisation, with a mission to ensure Venice remains a living city and a liveable one. We are recognised by the Italian State as a third sector organisation, as a non-profit and operating both as a research collective and activist platform to reinforce connections between the best available sources of information, stakeholders, and the local community.

We are writing to all members of the WH Committee to urge you to firmly support the proposal by the Unesco Secretariat and its Advisory Bodies (ICOMOS e ICCROM) to add Venice and its Lagoon to the Danger List of World Heritage. We have been [advocating for this since 2015](#).

Having carefully studied the various iterations of the State of Conservation Reports by the Italian State Party since 2017, in response to numerous decisions by the World Heritage Committee, it is obvious that *the founding principles of the 1972 World Heritage Convention continue to be ignored*.

Despite the repetitive written declarations in the State Party Reports, there is still no specific, concrete evidence of a genuine action to address the recommendations emerging from the WH Committee, as required by the Convention rules, *and in spite of many possibilities to implement positive change*.

In 2021, a last-minute announcement by the Italian Government to immediately block the passage of large cruise ships through the heart of the historic city and, sooner or later, from the lagoon was instrumentalized to avoid inclusion of the site on the Danger List. *Two years later, the issue is still highly contentious, a long term solution to resolve the incompatibility of large scale cruise tourism and Venice as a destination has still not been found and we cannot imagine the entry fee could possibly constitute a miracle cure.*

The countries that have signed the Convention should not let themselves be tricked, yet again, by any partial or provisional proposed “solutions” that, at best, provide a distraction from repeated non compliance by the relevant authorities - Venice is objectively at risk and thereby so is the WH Convention.

### **Overtourism and diminished cultural identity as well as quality of life**

In anticipation of the 45th Session of the WH Committee in Riyadh, a trial scheme for ticketing day-trippers has just been announced by the Venice Mayor and rushed through for approval by the town council, amidst protests and suspicion. This measure, among other things, does not set a limit on total visitor numbers or address the carrying capacity of Venice so would not necessarily reduce congestion, limit risks of overcrowding or improve the quality of life of residents.

Lockdown during the Covid-19 pandemic triggered intense discussion about the vulnerability of mass tourism-dependent places yet visitor numbers in Venice are evidently higher than before and the current administration continues to focus on the promotion of special events that tend to exacerbate the phenomenon. Nothing has been done in Venice to limit the expansion of temporary accommodation within the urban fabric despite a recent national law and while regulations are being successfully introduced in many other tourist destinations like Barcelona, Amsterdam, New York.

Coupled with a non-existent housing policy, living in Venice has become too difficult for many. Venice continues to lose 2 - 3 residents/day and the current population of 49,298 is now below the number of beds available for holiday makers (49,693). Resilient residents have been vociferous in expressing their determination to ensure Venice remains a living city and a recent [petition](#) addressed to UNESCO is rapidly gathering signatures.

### **Heritage Impact Assessment (HIA) for planned developments and transformations**

Following the 2015 Reactive Monitoring Mission, the WH Committee specifically called for a block on all new development plans as well as infrastructure projects and urban transformations pending HIA in relation to the Outstanding Universal Values (OUVs) of the Site. According to par. 172 of the Operational Guidelines, such plans and projects

must be submitted to UNESCO before any decisions are rendered irreversible. The State Party and Site Manager have so far ignored all requests to respect par. 172.

Multiple critical projects and plans are currently going through the approvals process or have already been approved in spite of the 2016 WH Committee resolution: “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 (cfr. Decision 40 COM 7B.52, Recommendation 7)”. It also ordered the Site to “Halt all newly proposed large-scale projects within the property and its setting until the above listed measures are put in place” (Decision 44 COM 7B.50 2021, Recommendation 10).

The State of Conservation Report released some weeks ago by the Secretariat and Advisory Bodies (“Analysis and Conclusions of World Heritage Centre, ICOMOS and ICCROM”) clearly highlights examples of un-submitted projects including a 60m tower in Mestre overlooking the lagoon, a large stadium and sports complex in the buffer zone that was refused support from the European Union (already approved), a supplementary rail link between Trieste and Mestre and proposed buffer zone that passes through both the Site (already approved), various new transport nodes including a terminal in the Montiron area, the most precious and delicate part of the lagoon, that would provide a high speed connection between the mainland and Burano.

Other large scale development projects and urban transformation plans - singly and cumulatively - are advancing that would have negative and irreversible consequences for the socio-economic fabric of Venice, that is already strained by the tourism “monoculture”, notably the Master Plan for airport enlargement to double visitor capacity to 20m by 2030.

These projects and plans would cause substantial loss of historical authenticity and cultural significance, which are an integral part of the OUV of the Site.

According to Recommendation n.10 of Decision 43.com.7B.86 (SoC Report 01/02/2020), a HIA was due by the end of 2021. It had already been announced in the Annex of the SoC Report 1/04/2017 (Decision 40.COM.7B.52). More recently, albeit six years later, the 01/12/2022 Report by the State Party also mentioned the HIA was still in progress.

Unfortunately Venice-based local organisations – and civil society in general – have not received the prescribed training for this important instrument nor have any groups outside the institutions that are part of the “pilot committee” ever been involved in any meeting to bring their perspectives despite the fact that the UNESCO guidelines stipulate active participation to ensure everyone is protected equally.

### **Management Plan, Buffer Zone, Governance and Vision**

The 2015 Reactive Monitoring Mission report also prompted the WH Committee’s request (Recommendation 4 of Decision 40 COM 7B.52) that “ ...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”.

Yet the Site Managers’ attention continues to focus on a vision based on speculative developments and tourism, while other aspects are relegated to empty claims and statements of intent. This contrasts starkly with the need for urgent action both locally and globally.

There is still no evidence of concerted engagement of a broader range of stakeholders, local organisations, associations and community groups in the Management Plan for the Site and Buffer Zone even though Decision 40 COM 8B in 2016 specified the need for participation by all parties interested in the Site’s development to collectively define the vision for the Site’s protection. The Plan itself has not even been yet finalised.

The Plan was due to be finished by 2022 (SoC Report 01/02/2021 in response to Decision 43.COM.7B.86). Also the more recent SoC Report (Dec. 2022) replying to Recommendation 8 of Decision 44.COM.7B.50 states that the Plan is still in development and a participatory phase is planned as well as communication with stakeholders and associations, in line with the Operational Guidelines for the implementation of the 1972 Convention. These intentions have not been implemented in any way and there is widespread concern about lack of engagement from local organisations.

## **Climate change**

Regarding climate change, coastal areas worldwide are in a difficult situation while local authorities governing Venice and the lagoon are notably unengaged.

Recommendation 4 of Decision 43.com.7B.86 resulted in the State Party committing itself to complete the Climate Action Plan by June 2021 and sharing it with the WHC prior to submitting it for political approval. To date, none of this has happened. Venice is also behind in its European obligations concerning the Action Plan for Energy Sustainability and Climate. Again, the State Party and Venice local authorities have made inconsistent claims.

While the trial phase of the MOSE flood defences is celebrated for having saved Venice from flooding since October 2020, there is still no certainty in a 50/100 year timeframe regarding flood protection or reconciliation of the lagoon ecology with more frequent closures to protect the physical and economic fabric.

## **Danger List**

In view of the above, together with many other details, there must be no further delay in assigning Venice and the Lagoon to the Endangered List as this would reduce the possibility and effectiveness of corrective actions and constitute a missed opportunity to trigger serious commitment to a review of governance by the Italian State Party and

local authorities *while undermining the mission and credibility of the UNESCO World Heritage Convention.*

The Secretariat and Advisory Bodies have expressed themselves clearly, adding rigorous analysis and evaluation to the voices of Venice and highlighting the contrast between territorial needs and speculative plans.

Inscription on the Endangered List is misperceived by the authorities in Venice and Italy as reputational damage, a criticism to be avoided at all costs, yet it should be seen as a sign of global support, represented by UNESCO, together with the opportunity to draw upon worldwide experience and expertise, for urgent implementation of strong OUV-focussed urban conservation and regeneration policies.

The whole world is watching as Venice and the islands accelerate towards a state of irreversible degradation, with the loss of Venice's social fabric together with traditions, decorum and the immense artistic and architectural heritage and the precious natural capital of the lagoon system. *Now is the time for diplomatic work between the State Parties of the Convention to demonstrate its significance - for the Venetians and for the world.*

Yours faithfully



Jane da Mosto

Co-founder and Executive Director

