

Strategic Environmental Assessment for the Program of Exploration and Production of Hydrocarbons Offshore Montenegro

Italian comments - Summary table of comments received from public and other institutions¹

Reference to the comments document received	Brief summary of the comments
<p>DVA.I.3180.8-2-2016.pdf - Comments from Matteo d'Ingeo for "Comitato Bonifica Molfetta", Rosanna Rizzi for "Coordinamento NoTriv Terra di Bari" and Francesco Mas for "Coordinamento NoTriv. Basilicata"</p>	<ul style="list-style-type: none"> - Prospection activities with "air-gun" and hydrocarbons extraction represent a serious risk for the quality of the marine habitat and for the life of marine species, in particular of cetaceans. - Planned activities of Government of Montenegro are divergent to the Declaration of Montenegro like the world's first ecological state. - In Environmental Report it is not completely considered that, in the area interested of probably drilling activities, it is possible to find out many unexploded and chemical bombs from the period of World War 2 or from the last war of Balkans.
<p>DVA.I.3222.9-2-2016.pdf - Comments from Province of Brindisi - Environment and Ecology Service</p>	<ul style="list-style-type: none"> - The use of geophysical prospecting techniques and in particular about the "air-gun" is very dangerous on the marine ecosystem and cetacean's habitat. - Adriatic Sea area is shaped as an enclosed space, for that reason it is more susceptible to adverse effects and pollution; - The analysis of cumulative impacts is not comprehensive of the assessment of sequential prospecting sessions and of other several impacts detectable in the area;
<p>DVA.I.3371.10-2.2016.pdf - Comments from Gargano National Park</p>	<ul style="list-style-type: none"> - Serious risk of irreversible destruction of marine environment especially in case of accidents; - Many negative impacts on habitat of cetaceans; - There could be serious effects on tourism in many environmental valuable areas and protected sites of European ecological network.
<p>DVA.I.3348.10-2-2016.pdf - Comments from Puglia Region- Department of Transportation, Urban quality, Public works and Landscape - Ecology section</p>	<ul style="list-style-type: none"> - Environmental Report in SEA fails to consider the impact of any possibility of leakage of pollutants (oil spill) into the sea; - Extraction plants produce emissions of polluting gas in the atmosphere; - Use of the geophysical prospecting techniques of "air-gun" and a growth of marine traffic is very harmful for the ecosystem, with irreversible effects on marine species and fishing economy; - High probability to having adverse impacts in protected areas and in many environmental valuable areas of Montenegro and in Italy; - Closeness of the operations area to the ecological network, in particular for the effects of the noise and of induced seismic activities; - Statistics show that is not possible to exclude risks of accidents in hydrocarbon extraction; - Many studies about marine currents in Adriatic Sea show an high rate of pollutant spread in the event of an accident, in particular directed to the coastline of Croatia and Italy; - Drilling activities may cause the dispersion of heavy metals, radionuclides, alkylphenols and various hydrocarbons, for long periods, with proved effects on fish fauna, molluscs and shellfish for human consumption;

¹ The summary is made only at the purpose of facilitating the presentation of received comments. It does not represent the official position that is only as stated in the original document of comments.

	<ul style="list-style-type: none"> - Not rational assessment of cost-effectiveness of the operation because considering the polluter pays principle, in the event of damage to the Puglia coast, the compensation costs for environmental and economic refunds could be incalculable.
<p>DVA.I.3629.11-2-2016.pdf - Comments from Regional Agency for Environment Protection of Puglia (ARPA Puglia)</p>	<ul style="list-style-type: none"> - The use of geophysical prospecting techniques of “air-gun” has a destructive effects on marine ecosystem and on fishing economy; - Considering an hydrocarbon extraction scenario, the oil spill could represent a serious risk for the ecosystem of several protected areas in Adriatic Sea; - As specific studies, as reported in comment, show, Puglia coastline will be highly susceptible to an event of oil spill, even several areas along Apulia coastline are Protected for theirs environmental value.
<p>DVA.I.3539.11-2-2016.pdf - Comments from the Institute for Environmental Protection and Research (ISPRA)</p>	<ul style="list-style-type: none"> - It could be important to avoid simultaneous prospection activities in order to limit cumulative impacts in deep sea; - It is necessary to provide most recent and detailed studies on the effects of the noise produced by prospection activities in sea, in order to obtain a more realistic assessment of impacts. Those activities could be very dangerous for the life of many marine species in particular for turtles and cetaceans; - The marine context between Italy and Montenegro is quite sensible because it represents an obliged migratory way for several water birds and migratory birds so it is necessary to investigate in detail the interference with the bird species; - The complex of indicators reported as relevant for monitoring the possible drilling activities should to be integrated with specific analysis on chemical composition of sediments and with the survey of planktonic organism and other species and algae; - Monitoring program should include indicators to survey probable conditions of using extraction platforms, considering the effect of discharges in water, drilling fluids etc. and propose suitable mitigation measures. - Planned activities in case of drilling action needs to be assessed in order to consider the high seismicity of the whole area, the possibility to activate fault lines, the event of seaquakes and submarine landslides. - It necessary to provide suitable mitigation measures considering sea current, in order to limit the effects of pollutant spreading in water and in seabed.
<p>DVA.I.3594.11-2-2016.pdf - Comments from the Ministry of Economic Development - Directorate-General for Safety of Mining and Energy Activities - National Mining Office for Hydrocarbons and Georesources)</p>	<ul style="list-style-type: none"> - Concerning the SEA documents, it is not possible to find any indication about sites, outside Montenegro, where will stored hazardous wastes. It should be proper to specify some possible sites able to collect these wastes. The site/sites for discharge of cuttings and muds must be identified, authorized and properly arranged; - Italian regulation forbid to discharge cuttings, muds and cements in the sea waters. About this, it should be noted that, nowadays, no agreement for defining the offshore boundaries between Montenegro and Italy is ratified. Therefore, suggestion is made specifying that Montenegro would not discharge its wastes in Italian sea; - Suggestion that Montenegro will enforce the same legal framework that Italian Operators adopt towards the neighbouring states; - About the use of strobing lights instead of steady ones on the platforms, it would be appropriate for Montenegro to follow the International maritime and air transport regulation, in order to avoid collisions and accidents, for example “Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREGs)” and similar;

	<ul style="list-style-type: none"> - It would be appropriate to take into account the overlapping among some specific blocks (nr 8, 9 and 10) of this first bidding round and the Map of Unexploded Ordnance Dumping Sites in the Southern Adriatic Sea of the R.E.D.C.O.D. Project (Research on Environmental Damage caused by Chemical Ordnance Dumped at sea), co-financed by the European Commission DG Environment.
DVA.I.3740.15-2-2016.pdf - Comments from Municipality of Polignano a Mare (Bari)	<ul style="list-style-type: none"> - The prospection activities and the possibility of proceeding in hydrocarbons extraction represent an high pollution risk for an extended area, disseminated of touristic attractions and environmental values. - There is no compliance among activities planned and the current vocation of Adriatic area: the surveys technologies may cause serious harm to the marine habitat and drilling activities could release toxic sludge in the sea destroying fishing economy. - It is necessary to consider the consequences on human life in a wider area because of the slow accumulation of pollutant substances, oil, heavy metals, and toxic agents in water, in atmosphere and in whole food chain.
DVA.I.3774.15-2-2016.pdf - Comments from Gordana Simonovic	<ul style="list-style-type: none"> - There are many contradictions among the planning of hydrocarbons exploitation and the course of Montenegro government policies concerning the adoption of the Declaration of Ecological State on 1991; - The use of fossil fuels is one of the main factors of climate warming so these are non-sustainable activities; - It is necessary to consider that environmental costs far exceed the gains arising from the hydrocarbons exploitation also there is the real risk to produce not reversible damage, as is proved by recent accidents.
DVA.I.4521.22-2-2016.pdf - Comments from Alistair Smailes & Lorraine Edney DVA.I.4522.22-2-2016.pdf - Comments from Juraj DVA.I.4643.23-2-2016.pdf - Comments from Rosemary Underhay DVA.I.4786.24-2-2016.pdf - Comments from Pendo Tony DVA.I.4658.23-2-2016.pdf - Comments from Sime Validzic DVA.I.4659.23-2-2016.pdf - Comments from Jasminka Dimitrovska	<ul style="list-style-type: none"> - Serious threats for environment and high risks of spreading pollutant across the Adriatic Sea; - High probability to have harmful accidents.
DVA.I.4551.22-2-2016.pdf - Comments from Region of Marche	<ul style="list-style-type: none"> - It is necessary to provide mitigation measure in opposition to seismic surveys damages of marine habitat; - Planned operations imply a serious risk of pollution, for this reason it is necessary to include in environmental report, mitigation and intervention measures to face an oil spill scenario; - Part of the revenues of the oil exploitation should be preserved as funds to use for recovery environment and Adriatic Sea; - Environmental report not provide a coherence analysis about environmental objectives and EU environmental directives, in spite of the Republic of Montenegro aspires to become part of European Union.

<p>DVA.I.4641.23-2-2016.pdf - Comments from Anne Barrow</p> <p>DVA.I.4599.23-2-2016.pdf - Comments from Ursi Sonderegger</p> <p>DVA.I.4598.23-2-2016.pdf - Comments from Artur Kowalczyk</p> <p>DVA.I.4655.23-2-2016.pdf - Comments from Lucie Vokrouhlikova</p> <p>DVA.I.4630.23-2-2016.pdf - Comments from Georgetanne Matranga</p> <p>DVA.I.4656.23-2-2016.pdf - Comments from Iva Poklepovic</p> <p>DVA.I.4642.23-2-2016.pdf - Comments from Markus Enderle</p> <p>DVA.I.4635.23-2-2016.pdf - Comments from Renata Krsul</p> <p>DVA.I.4784.24-2-2016.pdf - Comments from Polacek Koralika</p> <p>DVA.I.4661.23-2-2016.pdf - Comments from Jorg Gaiser</p> <p>DVA.I.4785.24-2-2016.pdf - Comments from Mesic Ivan</p> <p>DVA.I.4960.25-2-2016.pdf - Comments from Ira De Luca</p> <p>DVA.I.5004.25-2-2016.pdf - Comments from Dijana Jakelic (Inglese)</p> <p>DVA.I.5039.25-2-2016.pdf - Comments from Julia Jaman (Inglese)</p> <p>DVA.I.5261.29-2-2016.pdf - Comments from Purtscher Clemens</p> <p>DVA.I.5264.29-2-2016.pdf - Comments from Leugers Heidi</p> <p>DVA.I.5358.29-2-2016.pdf - Comments from Metka Snoj</p>	<ul style="list-style-type: none"> - Prospections and drilling activities determine high risks of accidents that could permanently destroy the entire ecosystem, with negative impact on tourism, fishing and human health; - Marine current in an partial enclosed basin will spread polluting substances in whole Adriatic sea; - Drilling area coincides with undersea deposits of unexploded ordnance dating from Second World War 2 and from the recent conflict in former Yugoslavia.
<p>DVA.I.4846.24-2-2016.pdf – Additional Comments from Gargano National Park</p>	<ul style="list-style-type: none"> - Prospection activities and the extraction of hydrocarbons are very harmful for the ecosystem of Tremiti Islands and in particular for the life of protected species as cetaceans and marine turtles; - In general, the whole environment of Adriatic coast is quite susceptible, because it is a nearly-closed basin with many creeks and bays. Even, sea current should contribute to spread pollutant and oil leaks towards the coast of bordering countries; - Environmental report requires a more detailed impacts analysis on animal species and about the effects on food chain.

<p>DVA.I.4948.25-2-2016.pdf - Comments from Puglia Region - Department for Agriculture, Rural Development and Environmental Protection</p>	<ul style="list-style-type: none"> - Serious threats for the quality of sea, of life and production of molluscs for human consumption; - Adriatic area is not suitable to conduct the activities planned to the Government of Montenegro because of the presence of several protected areas as Tremiti Islands and others areas of European ecological network in Apulia Adriatic coast.
<p>DVA.I.4955.25-2-2016.pdf - Comments from Danijela Gjenero DVA.I.4958.25-2-2016.pdf - Comments from Kulavkovski Igor</p>	<ul style="list-style-type: none"> - Risks, related to the activities planned, are too high for a context like Adriatic Sea and in general there isn't any rational correlation with the possible benefits guaranteed by the oil exploitation; - Tourism is more profitable than the potential quantity of oil in sea depths of Montenegro.
<p>DVA.I.4991.25-2-2016.pdf - Comments from Klisura Ksenija</p>	<ul style="list-style-type: none"> - There are frequent cases of accidents and oil spill during extractions; - Drilling operations should be very dangerous for the presence of unexploded bombs and because south Adriatic is a seismic area.
<p>DVA.I.4988.25-2-2016.pdf - Comments from Ines Janca DVA.I.5005.25-2-2016.pdf - Comments from Josip Vidovic</p>	<ul style="list-style-type: none"> - Against oil drilling exploitation.
<p>DVA.I.5359.29-2-2016.pdf - Osservazioni di Clean Adriatic Sea Alliance</p>	<ul style="list-style-type: none"> - Planned activities are incompatible with the provisions of the Climate Change Conference in Paris; - As concerning the high risk rate of those operations, sea prospection and oil exploitation could be harmful for touristic development and for fishing economy and health; - There is a relevant risk of accidents and oil spill during extraction activities.
<p>DVA.I.5359.2-3-2016.pdf - Additional Comments from Matteo d'Ingeo for "Comitato Bonifica Molfetta", Rosanna Rizzi for "Coordinamento NoTriv Terra di Bari" and Francesco Mas for "Coordinamento NoTriv. Basilicata".</p>	<ul style="list-style-type: none"> - The variation of some trends observed in the Adriatic Sea regarding chemical and physical indicators of quality of the sea, as temperature, salinity and acidity of water, should represent the real possibility to have cumulative adverse impact due to prospections activities of seismic surveys technologies. It is recommended a detailed scientific investigation on that issue.
<p>DVA.I.4990.25-2-2016.pdf - Comments from Silvana Munivrana</p>	<ul style="list-style-type: none"> - Text in Bosniac language