



Ministero dello Sviluppo Economico

DIREZIONE GENERALE PER LA SICUREZZA ANCHE AMBIENTALE DELLE ATTIVITÀ MINERARIE ED ENERGETICHE
UFFICIO NAZIONALE MINERARIO PER GLI IDROCARBURI E LE GEORISORSE

Ministero dello Sviluppo Economico

AOO Energia

Struttura: DGS-UNMIG

REGISTRO UFFICIALE

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MINISTERO DELL'AMBIENTE E DELLA TUTELA DEL
TERRITORIO E DEL MARE

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Oggetto: Valutazione Ambientale Strategica del Programma di Ricerca e Produzione idrocarburi off-shore del Montenegro – Consultazioni transfrontaliere.

In risposta alla nota prot. DVA-REGISTRO UFFICIALE-0001849 del 26/01/2016 di pari oggetto, si trasmette in allegato un elenco delle osservazioni formulate da questa Direzione in merito alle consultazioni transfrontaliere per il “Programma di Ricerca e Produzione idrocarburi off-shore del Montenegro”.

II DIRETTORE GENERALE

(Ing. Franco Terlizese)



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Strategic Environmental Impact Assessment for the Program of Exploration and Production of Hydrocarbons Offshore Montenegro – Transboundary Consultations.

Remarks by DGS-UNMIG (Directorate-General for Safety of Mining and Energy Activities - National Mining Office for Hydrocarbons and Georesources) of Italian Ministry of Economic Development

Overview of baseline environment

The Government of Montenegro has adopted the Law on Exploration and Production (E&P) of Hydrocarbons in 2010 (OGM 41/10 and 10/11) which is fully harmonized with the EU Directive 94/22/EC (Hydrocarbon Licensing Directive).

The exclusive economic zone of Montenegro covers the area of 7,745 km², which will be the subject of exploration. In the first bidding round, the Government offered the total of 13 blocks (Figure 1) and portions of blocks in the Montenegrin offshore for Production Concession Contracts.

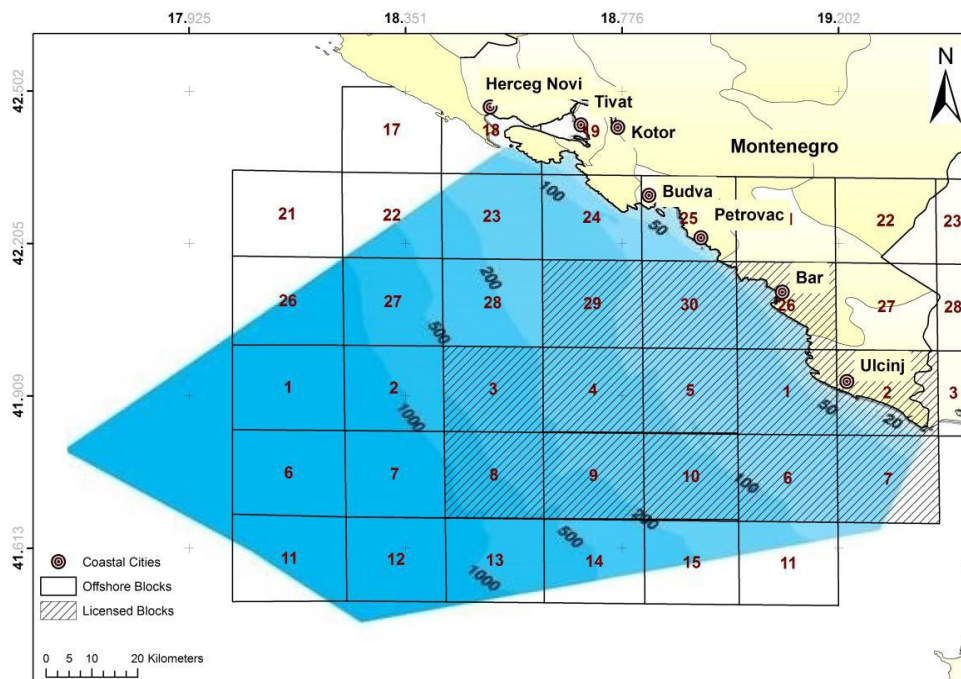


Figure 1. Blocks for award of hydrocarbons exploration concession contracts



Possible impacts and mitigation measures

The Strategic Environmental Impact Assessment Study will assess impact of oil and gas exploration and production in Montenegrin offshore on the environment, society and health.

- **Page XVI of Non-Technical Summary states:**

“There is currently no infrastructure for hazardous waste treatment in Montenegro. For this reason, in accordance with the Law on Waste Management ("Official. Gazette of Montenegro", no.64/11) and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, and based on licenses issued by the Agency for the Environment, hazardous waste is exported from Montenegro.”

Remark: it is not possible to find in the Documents any indication about sites outside Montenegro where to store hazardous wastes. It should be proper to better 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. So, we suggest to specify that Montenegro will not discharge its wastes in Italian sea.

Italian regulation (D. Lgs. 152/2006 Art. 104, co. 3; Law 239/2004 Art. 1, co. 82-sexies) allows instead to discharge wastewater in the Italian sea, prior to Italian Ministry of Environment (MATTM) authorization.

- **Page XVII of Non-Technical Summary states:**

“The discharges of drill cuttings, muds and cement from the top sections of the wells, which are deposited close to the sea bed at the wellheads, are expected to cause impacts at each well site. To avoid such impacts, a policy of not allowing discharges at sea from drilling activities will be adopted; operators will be obliged to discharge cuttings and drilling fluids outside Montenegro.”

Remark: we suggest to list the site/sites for discharge of cuttings, muds and cement must be identified, authorized and properly arranged (as for the above mentioned remark).

- **Page XVII of Non-Technical Summary states:**

“It is important that similar policies be adopted in other countries of the Adriatic to be able to control cumulative impacts.”

Remark: we suggest that Montenegro will enforce the same legal framework that Italian Operators adopt respect to Transboundary States (see, i.e., D.M. 111 of 11th June 2015 of Italian Ministry of Environment - MATTM).



- **Page XVIII (and following) of Non-Technical Summary states**

“Migrating birds can become disoriented when encountering a steady artificial light source at night which cause birds to circle the light source for hours, increasing the risk of collision with the lighted structure, decreasing fat reserves, and potentially interrupting migration. [...] To avoid the impacts on birds especially migratory birds. It is recommended to use fewer lights as much as practical; use low intensity lights; avoidance of the use of white lights (white lights are the least favorable choice for lighting structures) and use strobing lights instead of steady lights.”

Remark: about the use of strobing lights instead of steady ones on the platforms, it’s 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.

Further remarks:

It’s 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 (see Figure 2, below).

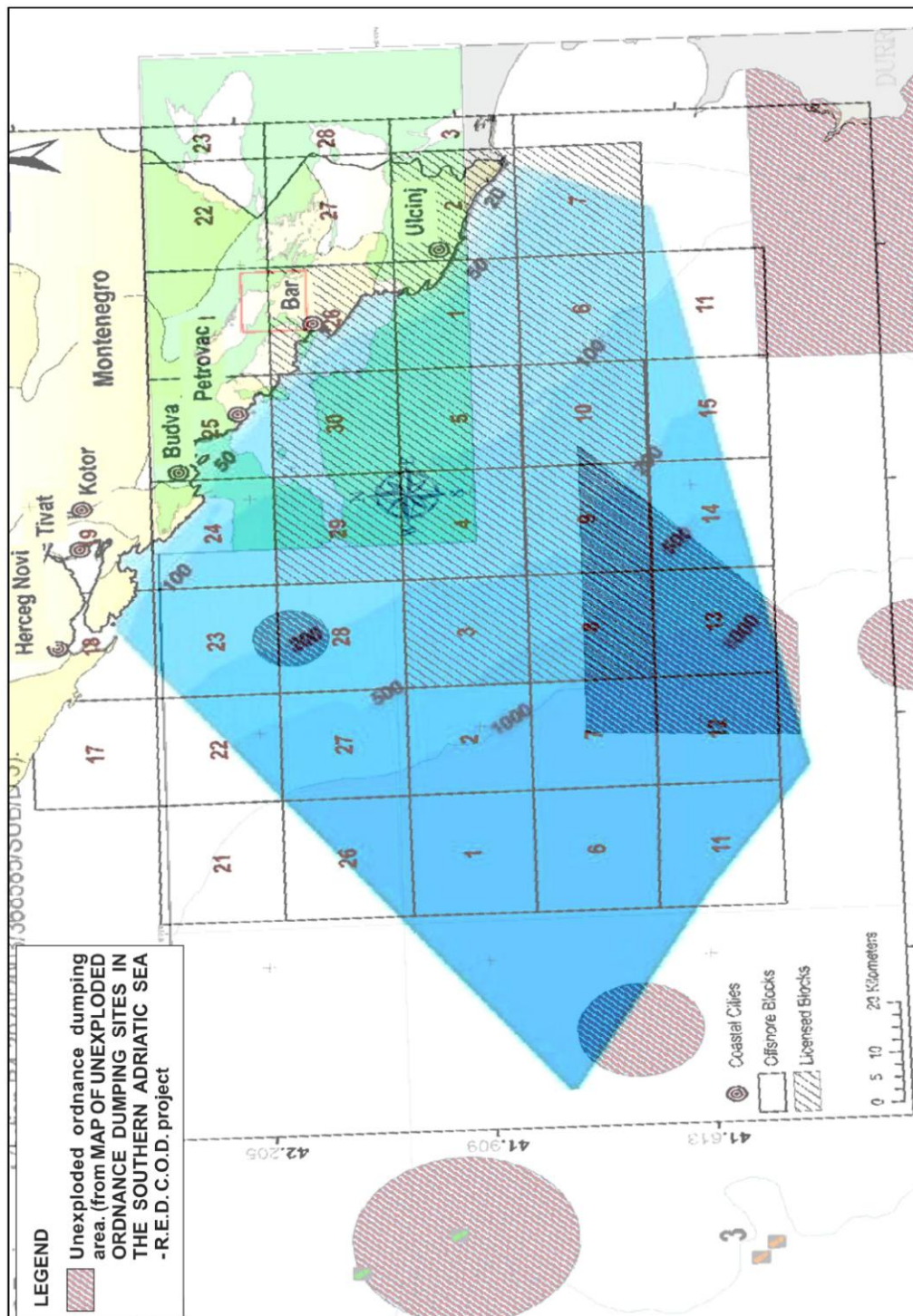


Figure 2 - Map of Unexploded Ordnance Dumping Sites in the Southern Adriatic Sea: overlap with block of Fig. 1.