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Plan Maritime Area "Adriatic"

Written comments on the Italian Maritime Spatial Management Plan -
Maritime Area "Adriatic"

Dear Ms. Maggiore,

We are very much grateful for your spirit of cooperation and for the extension of the deadline for written comments in Transboundary Consultation of the Italian Maritime Spatial Management Plan - Maritime Area "Adriatic".

We would like to inform you that Ministry of the Environment and Spatial Planning from Republic of Slovenia has finished national consultation and public hearing of the Italian Maritime Spatial Management Plan - Maritime Area "Adriatic" and already received some written comments from ministries and organisations responsible for individual parts of the environment, including health. Ministry received written comments from Ministry of Health, Ministry of Culture, Ministry of Agriculture and Forestry and from Institute of the Republic of Slovenia for Nature Conservation.

Below, we provide some written comments on the Italian Maritime Spatial Management Plan - Maritime Area "Adriatic" (in the following text MSMP):

1. General comments (comments on graphic):

- The national borders at sea, both between the Republic of Italy and the Republic of Slovenia as well as with the Republic of Croatia are not clearly or correctly drawn. We propose that the national borders at sea be clearly and correctly displayed. When drawing of the maritime boundary between the Republic of Slovenia and the Republic of Croatia the arbitration award should be taken into consideration.
- The existing uses and the planned spatial arrangements are not evident from graphic representations, and that is quite important for the environmental impact assessment. We therefore suggest that a clear distinction be made between the existing and the envisaged arrangements.

2. Three uses with potential impacts on the Slovenian sea and the coastal zone are identified immediately adjacent to the national maritime border with the Republic of Slovenia. As the national borders at sea are not clearly or correctly drawn, it is not possible to determine whether these uses also extend into the Slovenian territorial sea. These uses include:
 - a) Fishing area (marked with a pink grid) extending into the Slovenian Sea. The most intensive fishing effort is foreseen close to the national border at sea, which may have a negative impact on the presence of fish species in the Slovenian sea. We suggest that the area be appropriately marked.
 - b) Aquaculture area (shown in pink) directly on the northern side of the national border at sea. The explanation makes it clear that these are the existing uses, which are shown in order to explain the planning decisions more adequately, but it is not clear from the graphic representations what the existing (aquaculture concessions already granted) and the planned spatial arrangements are within the listed sea uses, which is quite important for the assessment of the environmental impacts.

In addition, in the graphic representation of possible interactions between aquaculture and transport and between aquaculture and fisheries, the graphical indication of the aquaculture area is very large (a red dot) and it shows almost the entire Slovenian fishing sea, not just the aquaculture area. We suggest that the graphic representation should be appropriately marked, or please clarify.
 - c) Power lines which run along the national maritime border through the separation zone of the joint Traffic Separation Scheme and is to be retained in the current location. The existing or planned new locations of energy corridors (power lines, gas pipelines) in the areas of shipping routes and anchorages may be conflict from the maritime perspective. In the area of overlaps with shipping routes, the management of the submarine pipeline, especially maintenance work and emergency anchoring in case of force majeure, may be problematic. This could cause negative conflicts between power lines and navigation; therefore, a recommendation should be added that such energy developments should be located as far as possible outside the area of the joint Traffic Separation Scheme in the Gulf of Trieste, and that, in the case of routes in navigation areas, corridors should be marked appropriately on nautical charts and that appropriate navigation regimes should be prescribed.

In the Slovenian territorial sea, just off the border with the Italian Republic, in the Bay of St. Bartholomew, there is a Slovenian shellfish farm with water rights awarded. Given that the actual demarcation of the national border at sea is not clear or correct, it is possible that the power line passes through the area of the shellfish farm, or if a power line runs in the immediate vicinity, there may be temporary negative impacts on the cultivation of marine organisms, as well as on the nearby bathing waters.

There is also a protected area (a landscape park), a Natura 2000 site and the Debeli Rtič natural asset in the bay at Debeli Rtič. The area also contains classified immovable cultural heritage (underwater archaeological heritage) and cultural landscape. The construction of a power line over this area could cause negative impacts on the protected nature area as well as the habitats and species present there.
3. MSMP focuses its further development mainly on the preservation and development of existing activities: trade, tourism (including pleasure boating), recreation, fishing, and aquaculture. Development planning takes into account climate change, environmental requirements, interferences with other activities and the need to maintain a suitable seabed (especially for navigable corridors, which involves mud transport). Maritime transport and tourism are highlighted as key development areas:

- a) Through proper regulation and good monitoring, maritime transport should not have major impacts on the marine ecosystem, and the overall state of the sea should not deteriorate because of increased maritime traffic. However, the corridor of the traffic separation system may become congested and thus have a direct and negative impact on fisheries in the Slovenian sea.

It can also be assumed that there will be an increase in the transport of marine sediment in order to preserve shipping corridors and ports. However, the MSMP does not provide any locations for the transport of marine sediment.

- b) Tourism, especially nautical tourism (cruise liners) can be expected to increase.

Regarding the expected increase in maritime traffic (transit and nautical tourism), we propose that the Republic of Italy provide an assessment of the carrying capacity of the sea for the whole of the Gulf of Trieste, for all the planned activities (maritime transport, tourism and recreation, fishing, aquaculture). With the MSMP all these activities are planned along the national border at sea. Further development of these activities is expected to intensify and therefore we suggest that authors of the MSMP and authors of the environmental report ensure:

- consideration of transboundary environmental impacts in the environmental report summarising and evaluating main environmental impacts in the Republic of Slovenia and mitigation measures that may be required;
- an appropriate graphic representation of existing and planned developments in the transboundary zone, along with all relevant protection regimes, also in the Slovenian territorial sea.

4. MSMP highlights maritime transport and tourism as essential development areas, while the protection of the environment and natural resources is not envisaged. We propose that at least the detrital bottom area should be included in the MSMP. According to our information, it has already been agreed that all three bordering countries (the Republic of Italy, the Republic of Croatia, and the Republic of Slovenia) will endeavor to protect the detrital bottom. The detrital bottom area has already been included in the Maritime Spatial Plan of the Republic of Slovenia.

Written comments from ministries and organisations in origin and translated into English language will be sent later as soon as we will receive them from the translation service. As Ministry received quite some written comments and questions, we therefore propose that, according to Article 6 of the Espoo Convention, technical consultations should be carried out.

We thank you for your kind cooperation.

With best regards from Slovenia,

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