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Florence, Rome, Milan, Prato; November 22th 2017

# UNESCO – Visit in Florence - Official compliant on WHC report "Falsification of facts on request"

This is the only name for the report of "endorsement" of the Unesco World Heritage Centre mission to Florence, led by Ms Isabelle Anatole-Gabriel and Mr Paul Drury of ICOMOS International, based on a hearing that excluded many regional and national associations.

It is striking that certain citizens' groups and associations active in particular on the question of airport expansion were excluded from the hearing. These groups had already appealed to the previous Direction of the World Heritage Centre, Mr Kinshore Rao (see enclosed correspondence

#1/#2/#3) and met with Professor Maurizio Di Stefano of ICOMOS Italia (Naples), handing him a volume detailing many critical points, a copy of which was sent to WHC. These groups also won a case before the Administrative Court of Tuscany TAR against the Regional government's amendment of the regional planning document (PIT).

In the report we read (our translation): "The current proposal (Figures 1 and 2) is for a new runway that replaces the present one; it will be 2.4 km long and will run east-west along the Arno valley. The planes will take off towards the west and land from the west, far from the historic centre and avoiding surrounding residential areas. The new terminal will be to the south. Second landing attempts (0.1-0.4% of landings) will circle north of the historic centre, over the hills". This is a cut-and-paste from the Environmental Impact Study of the Aviation Authority ENAC and Toscana Aeroporti SpA. The National Evaluation Commission of Environmental Impact Assessments (Report # 2235 dated Nov. 2<sup>nd</sup> 2016) formulated **no less than 142 provisos** to be followed to limit the impact of the airport expansion project.

Florence Airport company commissioned a study from aeronautical experts (headed by engineer Umberto Corvari) in which we read that "the current fly-over problems are not modified by changing the orientation of the runway, so operating capacity does not change unless the planes fly over the city of Florence".

The figures declared by the Tuscan Regional Environmental Protection Agency (ARPAT) and the Regional government during the PIT amendment procedure, in the *fleet mix* (#4/#5) enclosed with all the official documents, indicate 14-16% of flights over the city, and alternatively the cancellation and/or diversion of flights. It is not clear why Isabelle Anatole-Gabriel and Paul Drury did not consider this documentation. It suggests that they dealt with the question in a very superficial manner.

The text on diverted flights does not consider that a mere 1.9% are actually due to tail winds, well within the limits set by the International Civil Aviation Organisation ICAO.

Another aspect that should not be underestimated is that AB 319s, which already land in Florence (Scandinavia, Russia and Middle East routes), have a range 1000 km greater than the Class C aircraft that would land on the new runway. The above routes are therefore already possible, especially if the provisos of the Environmental Impact Assessment decree 0676/2003 are implemented.

Astutely, the project is simply passed off as a new runway, when at the same time the class of aircraft is increased from the current airport classification code 3/C to the 4 D/E, which will only land once the "waters have calmed" and they are given the "go ahead".

If the true aim of the mission was to check landscape protection aspects, it would have asked why in the case of the current runway 05/23 the provisos indicated by the above decree are not implemented. These provisos were considered necessary to lower the environmental impact of the infrastructure, protect the Sites of Community Importance (SCI), and improve outstanding universal value (OUV) buffer zone management by noise abatement and better flight management. These requirements are also envisaged by the "Decisional Decree of the President of the Republic" dated 5th June 2012, directed to the Ministry of Environment (#6), **not made available until yesterday, 21st November 2017**, and never actuated even though the experts of Florence City Council are presumably on the Commission of Florence Airport in charge to verify Health, Environment, Noisy.

This is why we consider point 3.2 of the report of the UNESCO mission to Florence an evident NON technical, superficial, incorrect, technically untrue intrusion, that can only be interpreted as a deplorable political endorsement, without any technical or scientific foundation.

We therefore ask the members of the WHC Committee to whom this letter is addressed to officially retract point 3.2 of the Report, or alternatively ensure that the question is opened again with a wider panel of experts and contributions from stakeholders who were excluded from the previous hearing.

We are at your disposition for a detailed technical discussion on the question of Florence airport, so that the Commission can know the different positions and express itself with due independence.

We look forward to receiving an official reply to our request.

Your sincerely,

Italia Nostra Toscana - Florence WWF Toscana –Florence Legambiente Toscana - Florence Associazione Forum Ambientalista – Rome Medicina Democratica Onlus – Milan Coordinamento Comitati per la Salute della Piana di Prato e Pistoia - Prato Associazione VAS, Vita Ambiente e Salute Onlus - Prato

## Attachments

#1/#2/#3) Correspondence WHC / UNESCO

#4/#5) ARPAT Fleet mix attached to all official documents

#6) Decreto Decisorio Presidente Repubblica rejecting the instance of Florence Airport Company