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Project Title: Trans Adriatic Pipeline – TAP
Document Title: Response to the Observations from the Public

ECOLOGISTI DEMOCRATICI SALENTO - DVA-2013-0012926
dated 04/06/2013
1 INTRODUCTION

This document presents the response to the observations received by the local Authorities and the public to the original ESIA document, submitted in March 2012, within the TAP project ESIA procedure (ref. art. 24 D.Lgs. 152/2006 and further amendments) about the original ESIA document submitted in March 2012, provided by the Ministry of Environment (MoE) by the following letters:

- Letter dated 13/09/2012, protocol DVA-2012-0021952;
- Letter dated 27/06/2013, protocol DVA-2013-0015193;

The originators and MoE Reference number of these observations are detailed in the following Table 1-1, together with reference to the section of the present document they have been addressed/commented upon. A full copy of the observations received is included (in digital format) in the DVD attached to this document.

**Table 1-1 Observation received by the Authorities and the Public**

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### Project Title:
Trans Adriatic Pipeline – TAP

### Document Title:
Response to the Observations from the Public

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The letter received from Italia Nostra Onlus (September 2011) was related to the Scoping procedure and therefore does not consider the further ESIA documentation submitted to the MoE and available to the public from March 2012.

However, this section provides a response to the main observations contained in that letter, as summarized below:

**Observations**

1) The declared purpose of the implementation of the project is to transport gas from deposits in Azerbaijan to Southern Europe; and the passage in the Salento area was chosen because it is the shortest and/or most optimal track for the connection; therefore no reference to the local energy balance, or to the specific needs of the communities of Salento was made. That is not only to support local interests, but rather to affirm the principles where the pursuit of "general interests" (though important) should not go beyond the "special interests", obviously legitimate ones. In other words, it is essentially a financial investment, which is independent from actual consumption and from real potential for saving and rational use of energy in the territories crossed.

2) There is no justification for the size of the work (10 Mmc per year) which appears to be more like a value chosen a priori on the basis of cost-effectiveness calculations than as an appropriate contribution to local needs.

3) The proposal is independent from the current proposal of the GNL gasification plant in Brindisi, which is also potentially of the same magnitude and whose implementation may not be an alternative, but rather in addition to the proposal in question.

4) The route involves the cutting (except then the subsequent replanting and effective rooting) of thousands of olive trees; the damage may be so immense, and require sustainable and scientifically valid reasons to accept this potential blemish to the land and threats to other more congenial uses of land development, the movement of adult trees however involves great trauma for the plant and at the same time a risk linked to subsequent vegetative regrowth.

5) some stretches of the route should interest particularly sensitive territories because of their natural and landscape values, as well as the economic and social development values. In particular, the areas more adjacent to the coast are highlighted, one near the town of Acquarica di Lecce and the other in the municipality of Cavallino, which is between the villages of Galugnano and San Donato.
6) the necessity and opportunity, in various procedural stages of the project in question, for the University of Salento to be involved as well as especially the teachings of Cultural Heritage and Biological Science, i.e. to acquire additional knowledge and identify possible solutions to those impacts (temporary and/or permanent) that are to be dutifully avoided.

7) the cost-benefit balance must never be analysed from the point of view of investors, who evidently tend to think in terms of “profit” and appropriately “minimizing costs”, while respecting the standards and technique, but rather of the population affected and the areas that are likely to be affected, once again, by interventions where the damage (environmental, economic and social) is not commensurate with the potential benefits.

Responses

1) Section 2 of the ESIA includes the project justification to which reference is made. In particular it should be highlighted that the TAP project will contribute to the security and diversification of Europe’s energy supply as a whole, including Italy. The TAP pipeline will be connected to the Snam Rete Gas national grid, which serves Italy including the local communities. It is true to say that the project is justified on wider needs than purely the local communities, though of course the latter will also benefit from the increased energy security it provides.

2) As per the above response, TAP will contribute to the security and diversity of Europe’s and Italy’s energy supply by providing the necessary infrastructure to transport gas from the Shah Deniz II field in Azerbaijan via the most direct route to Southern Europe. The start of production is anticipated to be early 2019. With reference to the scale of the project, TAP is specifically designed to cater for the 10 Billion Cubic Meters (BCM) per annum (expandable to 20 BCM) of new gas which will be made available from the Shah Deniz II field.

3) In the area of Brindisi there was a project referred to as Brindisi LNG S.p.A. related to a proposed GNL regasification plant to be operating in the area. This project was officially abandoned in March 2012, therefore it cannot be considered either as an alternative or an additional project to TAP.
4) It should be noted that the observation received by Italia Nostra is related to the preliminary pipeline route presented in the Scoping documentation and the present ESIA is related to a different route. The impact assessment related to olive trees and the anticipated mitigation/compensation measures are reported in Section 8 of the ESIA (in particular in Sections 8.5, 8.6 and 8.7), to which reference is made. Although construction activities do not interfere with any tree included in the regional list of “monumental olive trees” (approved by the Regional Council with resolution n. 357 of 7 March 2013), there are olive trees of significant age and size along the working strip. Indeed, based on the field survey performed in July 2013, there are about 250 olive trees with a trunk diameter greater than 70 cm that potentially will be affected by the Project. TAP AG commits to restore the condition of the land to the ante-operam status through the reinstatement of the olive groves. Upon request of the landowner, and in agreement with the relevant authorities, alternative compensation measures could apply. Other significant landscape features disturbed during construction will be considered on a case-by-case basis and the need for and nature of their reinstatement agreed with the relevant authorities/landowners.

5) As reported in the previous point 4, the observation received by Italia Nostra is related to the preliminary pipeline route presented in the Scoping documentation and the present ESIA is related to a different route. The new proposed pipeline route is located South of the previous route, granting a greater distance in particular from Acquarica di Lecce and its proposed Eco-museum (more than 2 km), with high Cultural Heritage value. The baseline analysis and the impact assessment related to natural, landscape and socio-economic characteristics of the crossed territories are discussed and evaluated in detail in Sections 6 and 8 of the ESIA, to which reference is made.

6) TAP has already developed a working relationship with the University of Salento. The University of Salento will provide further useful consultations for the development of the Project.

7) Sections 6.3-6.6 and 8.4-8.7 of the ESIA deeply analyse the baseline and assess the potential impact on the socio-economic environment of the study area. Please refer to the above-referenced sections of the ESIA for the assessment of the potential impact on local population and crossed territories.
3 MUNICIPALITY OF CAVALLINO - DVA-00_2011-0023185 dated 15/09/2011

The letter received by the Municipality of Cavallino (September 2011) was related to the Scoping procedure and therefore does not consider the further ESIA documentation submitted to the MoE and available to the public from March 2012.

The observations included in the letter received by the Municipality of Cavallino (September 2011) are related to the preliminary pipeline route crossing the municipality. These observations include concerns related to the presence in the Cavallino territory of Environmental and Cultural Heritage criticalities and constraints which can be interfered with by the pipeline (e.g. dry stone walls, pagghiare, geomorphological scars and archaeological features).

The assessment and the project included in the Scoping documentation was still at a preliminary stage. As stated in the ESIA Section 2, originally TAP Project route was 21 km in length from the landfall to the tie-in with the Snam Rete Gas Network (including Cavallino Municipality, as stated in the Scoping document), but on the basis of communication that occurred between TAP and Snam Rete Gas (SRG), it was decided to end the TAP AG onshore route at the Pipeline Receiving Terminal (Kp 8.2) in the Municipality of Melendugno, while the other section of the route will fall under the responsibility of SRG. For this reason the Cavallino Municipality is no longer crossed by TAP pipeline route and therefore potential impacts on the municipality are not included in the ESIA.
4 MUNICIPALITY OF MELENDUGNO - DVA-00_2012-0007724 dated 29/03/2012

The Council Resolution of the Municipality of Melendugno (DVA-00_2012-0007724 dated 29/03/2012) stated (Council Resolution n° 5/2012) the commitment of the Municipality to deny any authorization, permission, judgments, variations to urban planning of the Municipality of Melendugno related to the TAP Project. This Resolution was contested by TAP AG and abolished by Apulia TAR (Regional Administrative Court) section of Lecce (sentence n° 1048, 13th May 2013).

However, this document provides a response to the main observations contained in that letter, as summarised below:

Observations

1) Melendugno is a Municipality with a strong tourist vocation, known and appreciated not only for the historical, artistic and archaeological richness of the inland, but especially for a long stretch of charming and unspoiled coast, thanks to which the Municipality has been awarded the Blue Flag of Europe and other significant environmental and tourism awards several times in recent years.

2) Crossing the territory of the Municipality of Melendugno with a pipeline is difficult to reconcile, that is, it inevitably contrasts with the natural inclination of this territory to be used as a seaside resort like the one mentioned above, as well as with the interest of the community living there to increase the development of tourism and hospitality and activities, not limited to commercial activities or those of an economic nature, connected to it or in any case related.

3) The presence of such infrastructure may cause serious harm to the image of the places in question, with possible negative impact on tourism.

4) The socio-economic development, achieved with increasing momentum in the territory of Melendugno over the past decades, mainly based on the "exploitation" of its natural potential, above all the unpolluted sea, beaches, cliffs and the mild climate, has a strategic importance in its progress -- which is not merely economic, but also social and cultural -- of the resident community, and that the preservation of these "interests", together with the protection of everything that constitutes its source, cannot be compensated with any type of economic offset and/or compensation.
Response

The TAP Project design has been tailored in order to minimize the potential for impact on tourism, as TAP AG acknowledges the high touristic value of Melendugno. The ESIA considered this characteristic of the area in the impact assessment (refer for details to Sections 8.7 of the ESIA). In particular, the following should be highlighted:

- The project construction phase will take place mostly during winter months, particularly on the coastline. Construction activities near the coastline will be suspended during the summer period in order to avoid interference with tourism related activities.

- The landfall area will be not impacted by the project in terms of landscape and, in general, in terms of perception of the Project, since microtunnelling technology will be used to construct the landfall and minimise visual and long term physical impact to the coastline during the operational phase.

- During the project operational phase no impacts are foreseen to the coastal area, since the pipeline will be buried and not interfering with tourism perception/activities.
The Council Resolution of the Municipality of Castri di Lecce (DVA-00_2012-0011424 dated 14/05/2012) stated the commitment of the Municipality to deny of any authorization, permission, judgement, variations to urban planning of the Municipality related to the TAP Project.

The present section answers/comments the main observations included in that Council Resolution.

However it should be highlighted that originally (during the Scoping procedure) the TAP Project pipeline route was 21 km in length from the landfall to the tie-in with the Snam Rete Gas (SRG) Network, as originally communicated to SRG. This original route was crossing the Municipality of Castri di Lecce. In the further project development, on the basis of a new communication occurred between TAP and SRG, it was decided to end the TAP Italian onshore route at the Pipeline Receiving Terminal (Kp 8.2) in the Municipality of Melendugno. Therefore the Municipality of Castri di Lecce is not anymore affected by the TAP pipeline route and consequently potential impacts on the municipal territory are not considered in the ESIA study.

However, this document provides a response to the main observations contained in that letter.

**Observations**

1) [...] the presence of a terminal in the territory will surely produce harmful emissions in the atmosphere.

2) It will be necessary a pipeline buffer zone of 200 metres where almost nothing can be planted.

3) Once arriving on the coast of Salento, the pipeline is expected to continue underground in the territory of Vernole, Castri di Lecce, Lizzanello, San Donato di Lecce, San Cesario di Lecce and Lequile to connect to an existing Snam gas pipeline or in any case according to the provisions of the final TAP project.

4) The pipeline will be a sure obstacle to further tourist development for the entire area affected by the said construction and thus also for that of Castri di Lecce.

5) The environmental aspects and the protection of the territory could be severely compromised by a project that foresees major earthworks both at sea and on land, as well as a defined fiscal metering plant that is nothing more than a power plant built in the middle of the Salento countryside which still remains immaculate and protected aside to the urban areas.

6) The underground pipeline [...] presents hazards to public health, as demonstrated by the fires and accidents that have occurred elsewhere in Italy due to similar structures / [...] an underground pipeline is clearly dangerous, for example in case of earthquakes.
Responses

1) The PRT is not a power plant and therefore its emission will be limited, with no significant impacts on environment. The Environmental and Social Impact Assessment (document IAL00-ERM-643-Y-TAE-1000) submitted together with the present report, assess the potential impacts on air quality due to the PRT. As reported in the mentioned document, section 8.5.1.3 (to which reference is made for details), the impact on air quality due to PRT operation is estimated as Not Significant/Minor.

2) As stated in the ESIA (Section 4.5.2.2), a safety zone, the Right of Way (RoW), is foreseen along the pipeline route. Regarding permanent constraints, no construction activities will be allowed in the first 20 metres of the RoW on both the side of the pipeline (40 m strip), no clusters of houses construction activities will be allowed in a strip of 100 metres in both sides of the pipeline (200 m strip). As discussed in Section 8 of the ESIA, any agricultural activity will be allowed on the safety zone and therefore no long-term impact is foreseen on agriculture due to the TAP pipeline presence in the area.

3) The TAP Italian onshore route will be ended at the Pipeline Receiving Terminal (Kp 8.2) in the Municipality of Melendugno.

4) TAP AG acknowledges the high touristic vocation of the region and the TAP Project design has been tailored in order to minimize the potential for impact on tourism. The ESIA considered this characteristic of the area in the impact assessment (refer for details to Sections 8.7 of the ESIA).

5) The project foresees mitigation measures and compensation measures which will minimize the potential impacts due to the necessary earthworks, limited to the construction phase. The final phase of construction activities includes all the reinstatement actions needed to fully reinstate the land cover and vegetation. In particular, in order to ensure that reinstatement is achieved to a high standard, before starting any construction work topographic and photographic records will be made of the existing condition of the pipeline route and the access roads. These records will be used as the standard against which the quality of the restoration work will be judged when construction work is completed. As detailed in ESIA Section 4, the PRT is not a power plant and will produce limited emissions to the atmosphere: for the related potential impacts please refer to the previous answer 1.

6) The Environmental and Social Impact Assessment (document IAL00-ERM-643-Y-TAE-1000) includes in its Section 8 the “Project Safety Measures Description”. In that Section, to which reference is made, an analysis of the potential malfunctions or accidents relevant to onshore and offshore pipeline and PRT is included. As discussed in the mentioned Section 8.12, it is to be highlighted that the PRT and the pipeline has been designed to minimize the causes of malfunctions and potential releases. It should be noted that no accidents, involving gas pipelines with diameter and wall thickness similar to the TAP gas pipeline, have ever happened either in Italy or in Europe (source: EGIG).
MUNICIPALITY OF CAVALLINO - DVA-2012-0012759- dated 18-05-2012

The letter received from the Municipality of Cavallino (May 2012) is constituted by two parts; the first of them is related to the Scoping procedure (previously received on September 2011) which was already considered and replied in the point 4 of this report. The second part of the letter, reports the considerations made by the Municipality of Cavallino, regarding the potential routes for the pipeline that will have to be constructed from TAP PRT for the connection with the Italian Gas Network.

The observations included in the letter received by the Municipality of Cavallino are related to the potential pipeline route crossing the municipality.

As stated in the ESIA Section 2, originally TAP Project route was 21 km in length from the landfall to the tie-in with the Snam Rete Gas Network (including Cavallino Municipality, as stated in the Scoping document). The TAP Italian onshore route ends in the Municipality of Melendugno. For this reason the Cavallino Municipality is no longer crossed by TAP pipeline route and therefore potential impacts on the municipality are not included in the ESIA.
In the letter received from the Municipality of Cavallino (21 May 2012) the TAP ESIA observations of the Municipal Council, already considered and replied in Section 6 of this Report and included in the letter of 18-05-2012, are attached.
The present section answers/comments the main observations included in the letter dated May 2012 received by Associazione Tramontana-Liberaassociazionediidee (a cultural association based in Melendugno), namely:

**Observations**

1) Given the location of existing pipelines in energy-related industrial areas, San Foca would be the first case in Italy of the landfall of a transnational gas pipeline in a purely tourist area, whose importance was demonstrated once again this year the most important awards in the seaside tourism sector, such as the Bandiera Blu ("Blue Flag") and the "five sails" of Legambiente.

2) With regard to the impact on the now vital tourist resort economy in the area surrounding area of the pipeline, the project only mentions statistical data without further analysis and quantification of the possible repercussions that the construction and operation of this energy infrastructure would have in the sector.

3) The report presented by TAP appears to underestimate the damage to the tourist industry. The mitigation measure of this damage, i.e. works suspension in the tourism peak season, does not take into consideration the territory promotion period and the trend of the sector towards deseasonalization. It is also unclear how the works will be stopped, or what will be the impact of the construction while on hold.

4) Another aspect to consider is the psychological one. San Foca, and the Salento in general, are a symbol of a land of great scenic and natural value and an unspoiled coastline that represents the added value of the tourism industry.

5) One aspect not considered in the TAP report is the long-term impact of this type of infrastructure. The growing demand for energy, global not local, and the directions of PEAR Puglia to replace traditional fossil fuels with natural gas, could lead in the medium to long term the construction of a thermal power plant fuelled by gas. The territory of Melendugno is totally incompatible with plants of this type as it lacks industrial development and its economy is based on tourism and farming.
6) The gas, once transported by sea to the mainland, must undergo a pressure reduction before it can be entered into the National Distribution Network. The induced pressure reduction is accompanied by a considerable temperature decrease of the gas due to the Joule-Thomson effect, which implies the need for an additional heating of the latter to prevent freezing. TAP argues that the process of depressurization does not fall under the cases in which the Joule-Thomson effect takes place, thereby making systematic gas preheating unnecessary. Nevertheless, it has provided for the installation of two boilers of 4.3 MWt, arguing that will be used only occasionally, in the case of high pressure gradients. The company has, to date, provided no quantitative estimate of the emissions attributable to this process, which are inevitable in the case of activation of the two boilers.

7) In the last project presented, the length of the onshore section was reduced to only 5 km, while in the meantime it was decided to place the depressurization terminal in the territory of Vernole at Acquarica. Starting from this station, Snam Rete Gas, the company that owns the National distribution Network, becomes responsible for the gas transport. To enter this gas into the national network, it must reach the nearest connection point, located in Mesagne, in the province of Brindisi. It will then be necessary to deposit more pipelines along the Salento territory, for a length at least equal to the air line distance between Acquarica and Mesagne, of 54.918km. It is not yet clear what will be the route followed by these pipelines, because no project or preliminary report has been presented in this regard. Finally, even if it was to return to the old hypotheses of transporting gas to the point of connection with the Regional Network, in San Donato, it would be necessary, in order to allow the outflow, to increase the flow rate of the pipelines arriving up to Mesagne, by a distance greater than 45 km. To date, no documentation of these interventions has been produced, even though the Ministry of Environment, in its observations on the project, has called for full transparency about all phases of gas supply.

8) Although the dimensions of the work require it, the project does not elaborate on the possible risks of collapse, as a result of drilling, of the karst cliffs of San Foca, already showing severe signs of erosion. For these reasons, despite the coast of San Foca not being able to allow it to be a test case for the application of microtunnelling technology, TAP does not refer to any other inshore drilling experience of the same size and in the delicate working conditions exposed. In this regard the risk arises that, once the project is approved, in the case of any difficulties encountered during construction of the tunnel, not being able to stop the works, it will inevitably be necessary to carry out the landfall of the pipeline with the classic sliding of the pipe protruding from the sea, proceeding directly both to the demolition of part of the cliff concerned, and the dredging of the shallow waters crossed by the pipeline.
9) The loggerhead turtle, whose presence in the Mediterranean Basin is well documented, is currently one of the marine species seriously threatened by the effects of human activity on the seas. It appears in fact on the Red Lists produced annually by the IUCN (International Union of Conservation of Nature) as a species at risk of extinction. The beaches along the Coasts of the Municipality of Melendugno are known as nesting places for this fragile species: in 2006 the eggs laid on the beach of Torre dell'Orso did not give the desired results and none of the 46 eggs hatched successfully; however the hatching of 41 eggs is documented, from which the young turtles were born in 2007 on the beach of San Basilio, a few metres from the landfall point of the pipeline. Since each turtle returns to nest in its birthplace, and since the Caretta caretta is a species characterized by migration, the Melendugno administration intends to launch the procedures to declare the entire area a Site of Community Interest. It would also be necessary to better investigate the interaction and interference caused to their routes by the construction and maintenance activities of the project.

10) The TAP pipeline will lick the Cassano marshland: it is an area that is home to unique species of terrestrial mollusks in Puglia and is of international natural interest.

Response

1) TAP AG acknowledges the high tourism value of the region and the TAP Project has been designed to minimize impacts on tourism. The actual location of the proposed landfall is based on an assessment of 4 macro-corridors and 5 alternative routes and reflects a consideration of multiple factors, including environmental, technical feasibility and technical safety aspects. The ESIA considered this characteristic of the area in the impact assessment (refer for details to Sections 8.7 of the ESIA) together with the anticipated mitigation/compensation measures.

2) The ESIA considered this characteristic of the area in the impact assessment (refer for details to Sections 8.7 of the ESIA) and in the development of the mitigation/compensation measures. During the construction phase the landfall area will be not impacted by the project in terms of landscape and, in general, in terms of perception from tourism, since microtunnelling technology will be used to construct the landfall and minimise visual and long term physical impact to the coastline. During the project operational phase no impacts are foreseen to the coastal area, since the pipeline will be buried and will not interfere with tourism perception/activities.

3) With respect to the potential impact on tourism, as noted above this has been considered in great detail in the ESIA and the mitigation measures designed accordingly to minimise/remove the impacts of construction and operation of the pipeline. The closest TAP presence to the coast will be a secure fenced construction site at about 700 metres inland from the coast. In this area no work activity is foreseen in the summer season.
4) The ESIA report considered the characteristics of the area, as well as mitigation/compensation measures in the impact assessment (refer for details to Sections 6 and 8). The landfall area will be not impacted by the Project in terms of landscape and, in general, in terms of perception from tourism, since microtunnelling technology will be used to construct the landfall and minimize visual and long term physical impact to the coastline during the operational phase. The pipeline will be buried and will not be visible.

5) As described in Section 2 of the ESIA, the TAP Project purpose is to open the Southern Gas Corridor to transport gas from the Shah Deniz II field in Azerbaijan to Europe. The project is not connected to any planned power plant construction in the landfall area in Italy.

6) The Environmental and Social Impact Assessment submitted together with the present report, includes a revisited Project Design Section (Section 4) in which the PRT air emissions are detailed. The updated Section 8.5.1.3 of the ESIA (to which reference is made) includes a detailed assessment of the potential impacts related to the PRT emissions.

7) Refer to answer included in the previous Section 3. Moreover in Section 2 to the ESIA (ref. IAL00-ERM-643-Y-TAE-1002).

8) The new pipeline landfall, presented in the ESIA submitted together with the present document, has been moved about 500 m South from the landfall proposed in the ESIA submitted in March 2012, in order to avoid any interference/crossing of the cliffs located along the coast.

9) The request N.23 of the MOE Scoping Advice (prot. DVA-2011-0029847 dated 29 November 2011) requested to include in the ESIA an analysis of potential presence of priority habitat with particular reference to fish component. Additionally, in the meeting with the Minister of the Environment (MoE) held on the 7th of June 2012, TAP AG was required to provide more detailed information on fish nursery potential, marine mammals and turtles presence in the area of interest. The Appendix 7 of Annex 7 to the Environmental and Social Impact Assessment (to which reference is made) submitted together with the present report addresses the above mentioned requests, including the analysis of TAP potential impact on Carretta carretta.

10) Desktop and on field surveys of the Palude di Cassano area performed by TAP highlighted the presence of species of natural and conservation interest. Nevertheless the Impact Assessment performed in Section 8.6 of the Environmental and Social Impact Assessment Update (document IAL00-ERM-643-Y-TAE-1008) shows that the TAP project construction and operation will not modify the soil characteristic (e.g. physical –chemical characteristics, pH, etc.) and/or ground/underground water. Given the above the assessment does not foresee criticalities on malaco fauna in the study area. In any case the Monitoring Plans (before, during and after construction activities) will guarantee the adequate level of control and protection of the species of interest.
Attached to the letter received from the Municipality of Vernole (29 May 2012) is the Council Resolution of the Municipality of Vernole (dated 24/05/2012) stating the commitment of the Municipality to deny any authorization, permission, judgments, variations to urban planning of the Municipality of Vernole related to the TAP Project.

This section provides a response to the main observations contained in that letter, as summarised below:

**Observations**

1) It seems to be reasonable that within the end of 2012 the “South Stream” Project construction phase will start: the project refers to a pipeline to transport gas from deposits in Southern Russia to Varna in Bulgaria crossing the Black Sea. Also this pipeline should cross Greece and land in Otranto.

2) Considering that PRT is foreseen to be located at the boundary of Melendugno and Aquarica rural areas, the TAP project directly affects the territory of Vernole. The PRT area will cover 16 hectares of land adjacent to the south side of the road Aquarica-Specchia, next to the "Eco-museum of Landscapes of Stone". The Messapican ruins of “Pozzoseccato” are 560 m away from the perimeter of the PRT, that should be considered as an industrial plant.

3) Vernole Municipality has to take into account the presence of protected areas (SIC, IBA and ZPS areas) at 1,76 km from the pipeline route (south of “Le Cesine”).

4) The pipeline route crosses an area, where the typical elements of the landscape of Salento are present continuously over the entire area. The idea of being able to find, for every single evidence, a proper mitigation measure to minimize impacts, even with a meticulous and scientific approach, is the classic remedy “worse than the disease”. This approach, furthermore, would not avoid the overall perception of a distorted landscape naturalness and authenticity, considered as the main elements on which tourism focuses on, also in the next future.

**Response**

1) The South Stream Pipeline project, as reported in November 2012 by the National and International media, abandoned the route landing in Puglia.
2) The new PRT location, described in the Environmental and Social Impact Assessment update document (document IAL00-ERM-643-Y-TAE-1000), submitted together with the present report, does not foresee direct interference with Vernole territory and it is located 2.5 km far away from the “Ecomuseo dei Paesaggi di Pietra”. In general, related to cultural heritage sites, it should be noted that the PRT location was considered as the preferred location taking into account a number of factors including pipeline safety and environmental and social impacts and there are no sites of archaeological interest within the PRT footprint. There are also mitigation measures that will be implemented to avoid any damage on sites of Cultural Heritage importance.

3) The ESIA includes the Appropriate Assessment on Natura 2000 sites (Annex 9). As reported in the mentioned Annex, to which reference is made, considering the distance from the project, no impacts are anticipated on the closest Natura 2000 sites (Le Cesine).

4) The high tourism value of the Region has been acknowledged in the development of the Project TAP. In particular, in Appendix 1 to Annex 8 of the ESIA a specific Landscape mitigation report has been presented in order to reduce as much as possible the potential impact of the Project.
Mr. Pietroluongo presents observations to the TAP project, referring to an Oil & Gas exploration project and to the related work activities/potential impacts (e.g. use of air gun, drilling activities, potential oil spills, impact on marine fauna, etc.).

**Response**

However, TAP is a natural gas pipeline and therefore almost all the observations are not relevant to the Project.

In relation with the observations related to the potential impact on marine fauna (and in particular with marine mammals) it should be highlighted that they are only partially applicable, since they refer to a different type of project. *Annex 7 of the ESIA* (to which reference is made) submitted together with the present report, includes a detailed analysis of the marine fauna (including marine mammals) potentially impacted by the project and confirm the assessment included in the *Section 8* of the ESIA.
11 PRO LOCO – VERNOLE MUNICIPALITY - DVA_2012-0016309
dated 06/07/2012

The letter received from the Tourism Promotion Association, PRO LOCO del Comune di Vernole, contains the opinion of the Informative Assembly held on 19th April 2012.

The Assembly has given the following motivations to express their negative opinion towards TAP project:

1) The landfall location at Punta Cassano, San Basilio beach, is in an area of tourism vocation in continuous growth.

2) The landfall is located at around 2 km from the “Le Cesine” reserve, managed by WWF and declared SIC, IBA and ZPS.

3) The pipeline route is located in an area characterized by the Mediterranean maquis, dry stone walls and monumental olive trees.

4) The PRT is foreseen to be located next (around 500 m) to the "Eco-museum of Landscapes of Stone". The Messapican ruins of "Pozzoseccato", area with several “pagghiare”, very typical construction from the Salentine landscape, and at around 800 m. from the town of Acquarica di Lecce.

5) The restoration of the affected cultural resources won’t be able cancel the damage to the landscape and to the tourism promotion work already done by the local Administrations.

6) All the territory conservation work done along many years, would be spoiled by the impacts of the construction works.

7) The foreseen landfall location is coincident with an area assigned with “Bandiera Blu” award from Legambiente.

8) Other pipelines landfalls have been located in industrial an area, which makes inexplicable the TAP location in a coastal zone composed by cliffs already in danger.

The letter also highlights, the lack of information of the potentially affected population, and invites the relevant to reject any concession or authorization to the proposed investment.

Response

1) The landfall area will be not impacted by the project in terms of landscape and, in general, in terms of perception from tourism, since the microtunnelling technology will be used to construct the landfall and minimize visual and long term physical impact to the coastline. After the construction phase the Project will be not visible in the coastal area.
2) The ESIA includes the Appropriate Assessment on Natura 2000 sites (Annex 9). As reported in the mentioned Annex, to which reference is made, considering the distance from the project, no impacts are anticipated on the closest Natura 2000 sites (Le Cesine).

3) The baseline analysis and the impact assessment related to natural, landscape and socio-economic characteristics of the crossed territories are discussed and evaluated in detail in Sections 6 and 8 of the ESIA, to which reference is made.

4) The new PRT layout, described in the Environmental and Social Impact Assessment (document IAL00-ERM-643-Y-TAE-1000), submitted together with the present report, does not foresee direct interference with Vernole territory. Related to the archaeological area “Pozzoseccato” and the other cultural heritage sites, it should be noted that the PRT location was considered as the preferred location taking into account a number of factors including pipeline safety and environmental/social impacts and there are no sites of archaeological interest within the PRT footprint. There are also mitigation measures that will be implemented to avoid any damage on sites of cultural heritage importance.

5) See response number 3.

6) See response number 3.

7) See response number 1.

8) The actual location of the proposed project is based on an assessment of 4 macro-corridors and 5 alternative routes and reflects a consideration of multiple factors, including environmental, technical feasibility and technical safety aspects. The ESIA includes in its Annex 2 a comprehensive Alternative Assessment and, based on its outcomes, the selected Base Case Alternative ensures the least interaction with environmental, social and cultural heritage constraints in the considered study area and a related minimization of impacts on the environmental, social and cultural heritage components. Moreover it should be noted that several gas pipeline landfalls, located in coastal and touristic areas, are present in Italy. There are 8 Italian coastal areas (such as Casalborsetti, Province of Ravenna; Fano, Province of Pesaro-Urbino; Grottammare, Province of Ascoli-Piceno and Pineto, Province of Teramo) that are assigned with “Bandiera Blu” that also have pipeline landfall beaches.
12 MUNICIPALITY OF CAVALLINO - DVA-00_2012-0016978 dated 13/07/2012

The letter of the Municipality of Cavallino (DVA-00_2012-0016978 dated 13/07/2012) is a request to the MoE to allow Cavallino Municipality access to the documents related to the ESIA procedure.

The letter mentions also a note dated 18/05/2012 prot. No. 6477/2012, with which the Municipal Administration of Cavallino submitted to the MoE observations adopted by the Municipality Council with resolution No. 130 at the meeting on 18/05/2012, arguing that the latter project hypothesis does not appear to be functional as it does not provide for the identification of the line of the route between the Pipeline Receiving Terminal located in the territory of Melendugno and the final tie-in located in the Province of Brindisi.

As stated in the ESIA Section 2, originally the TAP Project pipeline route was 21 km in length from the landfall to the tie-in with the Snam Rete Gas (SRG) Network, as the original communication occurred with SRG. On the basis of the communications between TAP and SRG, it was decided to end the TAP Italian onshore route at the Pipeline Receiving Terminal in the Municipality of Melendugno. For this reason the Municipality of Cavallino is no longer crossed by TAP pipeline route and therefore potential impacts on the municipality are not included in the ESIA.
13 **MUNICIPALITY OF MELISSANO - DVA-00_2012-0017847 dated 24/07/2012**

The Council Resolution of the Municipality of Melissano (2012-0017847 dated 24/07/2012) stated the commitment of the Municipality to refrain from discussing any variation to urban planning that allows for the construction of the project and related equipment and facilities in agricultural areas subject to landscape constraints and in any case in areas with land use destination not conform to the industrial character of the project.

The main comment included in the Town Resolution is the following:

- “this industrial type of intervention would permanently and irreversibly disrupt existing territorial structure of Salento, compromising the development of tourism, agriculture, handicraft and industry, as well as the protection of the landscape and ecosystem”

**Response**

The Municipality of Melissano is not crossed/interfered with by the project, since it is located at approximately 40 km from the TAP project location, in the Municipality of Melendugno.

The ESIA and the present document include a comprehensive impact assessment of the project on the environment and socio-economic components together with which can exclude significant impact on Salento. Moreover, as discussed in the ESIA, TAP foresees the adoption of several mitigation and compensation measure to minimize the impact of the project.
14 MUNICIPALITY OF VERNOLE - DVA_2012-0018986 dated 07/08/2012

The Council Resolution of the Municipality of Vernole (DVA_2012-0018986 dated 07/08/2012) stated the commitment of the Municipality to deny any authorization, permission, judgments, variations to urban planning of the Municipality of Vernole related to the TAP Project.

This Council Resolution has been already considered and replied on the Section 9 of this Report.
This document includes the Council Deliberation of the Municipality of Melendugno (27-11-2012). The following requests have been made to the Apulia Region:

1) to adopt a clear contrary position towards the TAP Project, coordinating, exercising its institutional prerogative, and the initiative on the construction of energy infrastructure and the strategic development of the territory.

2) to evaluate the possibility to request the company Trans Adriatic Pipeline AG Italy, the proposed alternative pipeline involving other regional areas, which are more suitable for landing and construction of receiving terminals.

Response

The Council Deliberation of the Municipality of Melendugno (27-11-2012) was contested by TAP AG and abolished by Apulia TAR (Regional Administrative Court) section of Lecce (sentence n° 1048, 13th May 2013).

The actual location of the proposed project is based on an assessment of 4 macro-corridors and 5 alternatives and reflects a consideration of multiple factors, including environmental, technical feasibility and technical safety aspects. The ESIA includes in its Annex 2 a comprehensive Alternative Assessment and, based on its outcomes, the selected Base Case Alternative ensures the least interaction with environmental, social and cultural heritage constraints in the considered study area and a related minimization of impacts on the environmental, social and cultural heritage components.
16  MUNICIPALITY OF TRICASE - DVA-2013-0004674 dated 21/02/2013

This document includes the Council Deliberation of the Municipality of Tricase (11-02-2013). The following requests have been made to the Apulia Region, as already requested by the Municipality of Melendugno (refer to the previous Section 15):

1) to adopt a clear contrary position towards the TAP Project, coordinating, exercising its institutional prerogative, and the initiative on the construction of energy infrastructure and the strategic development of the territory.

2) to evaluate the possibility to request the company TAP AG, the proposed alternative pipeline involving other regional areas, which are more suitable for landing and construction of receiving terminals.

Response

It should be noted that the Municipality of Tricase is not crossed/interfered with by the project, since it is located at approximately 40 km from the TAP project location, in the Municipality of Melendugno.

As reported in the previous Section 15, the actual location of the proposed project is based on an assessment of 4 macro-corridors and 5 alternative and reflects a consideration of multiple factors, including environmental, technical feasibility and technical safety aspects. The ESIA includes in its Annex 2 a comprehensive Alternative Assessment and, based on its outcomes, the selected Base Case Alternative ensures the least interaction with environmental, social and cultural heritage constraints in the considered study area and a related minimization of impacts on the environmental, social and cultural heritage components.
The main observations included in the letter dated June 2013 received by ECODEM Salento (environmentalist political association from Salento) are:

1) Regarding the lack of the Project Basic Design, with detailed information regarding: Accidents Risk Analysis, Safety Plans, Alternative Assessment and Project justification

2) Impossibility of an in-depth analysis of the aspects related to the historical and cultural resources of the affected territory, due to the lack of information, mentioned in point 1;

3) Requesting a more detailed analysis of the geomorphologic risks of the costal cliffs crossed by the pipeline landfall;

4) Concerns related to the potential impacts due to air emission;

5) Concerns related to the potential impacts on tourism due to the Project.

**Response**

1) The updated Project Basic Design (doc n. IAL00-SPF-000-A-TRE-0001) has been submitted together with the ESIA and the present document. Section 8.12 of the ESIA generally describes the safety measures, adopted both in the construction and operational phases of the Project. The Safety Plans will be provided in a next phase of the Project and any case before the beginning of the construction works, in agreement with the relevant Authorities. The Alternative Assessment and the Project Justification are reported in ESIA Section 2 (a detailed Alternative Assessment is reported in Annex 2 to the ESIA).

2) In-depth analysis of the aspects related to the historical and cultural resources of the affected territory are reported in Section 6 (Baseline) and Section 8 (Impact Assessment) of the ESIA.

3) As described in the updated ESIA submitted together with the present document, the new Base Case landfall in not interfering with the high geomorphological risk area defined by the Territorial Hydrogeologic Planning (PAI);

4) The Environmental and Social Impact Assessment (document IAL00-ERM-643-Y-TAE-1000) submitted together with the present report, assess the potential impacts on air quality due to the PRT. As reported in the mentioned document, section 8.5.1.3 (to which reference is made for details), the impact on air quality due to PRT operation is estimated as Not Significant/Minor.

5) The high tourism value of the Municipality of Melendugno has been acknowledged during the development of the TAP Project. The ESIA considered this characteristic of the area in the impact assessment (refer for details to Section 8.7 of the ESIA).