

Temno nebo Slovenije

Dark-sky Slovenia

Teslova 30, Ljubljana, Slovenia
darksky@tp-lj.si
tel. +386 14776653

Mr Renzo Tondo, President of the Region Friuli Venezia Giulia
Mr Edouard Ballaman, President of the Council of the Region Friuli Venezia Giulia
Mr Vanni Lenna, *Assessore* for Environment

Ljubljana, 24.11.2008

CONCERN OVER THE PROPOSED CONTENT OF THE FRIULI VENZIA GIULIA DDL (LAW) 37 OF 29 OCTOBER 2008

Dear Mr Tondo,
Dear Mr Lenna,
Dear Mr Ballaman,

It came to the attention of a number of environmental non-governmental organisations based in Slovenia that the adoption of the Ddl (law) 37 of 29 October 2008 by the Region of Friuli Venezia Giulia Region would modify substantively the provisions of the **law 15 of 18 June 2007 concerning energy savings and light pollution**. We believe that the proposed changes will have significant adverse transboundary effects which justifies our involvement in the decision-making process.

Our environmental consortium is deeply concerned over the envisaged cancellation of the entire Article 11 of the existing law 15/2007 from the text of the draft of the new law (37/2008) guiding street lighting. The change would allow the inefficient luminaries to remain in use infinitely, while the law currently in force makes provisions for adjustments of the existing luminaries. In the efforts of effacing with a problem of light pollution it is sensible to deal with the matter comprehensively. A comprehensive approach cannot ignore the fact that a large part of the luminaries in the Region Friuli Venezia Giulia currently do not correspond to the conditions for effective reduction of light pollution. Permitting them to operate in the next decades without any compulsory adjustments directly and substantially contributes to energy inefficiency, emissions of greenhouse gases and environmental effects of these luminaries. Clearly, this **goes contrary to the very purpose of the law** – to maximise energy efficiency and minimise environmental pollution. It is hardly understandable that an effective existing law is modified in such a way as to contradict the area it is designed to regulate.

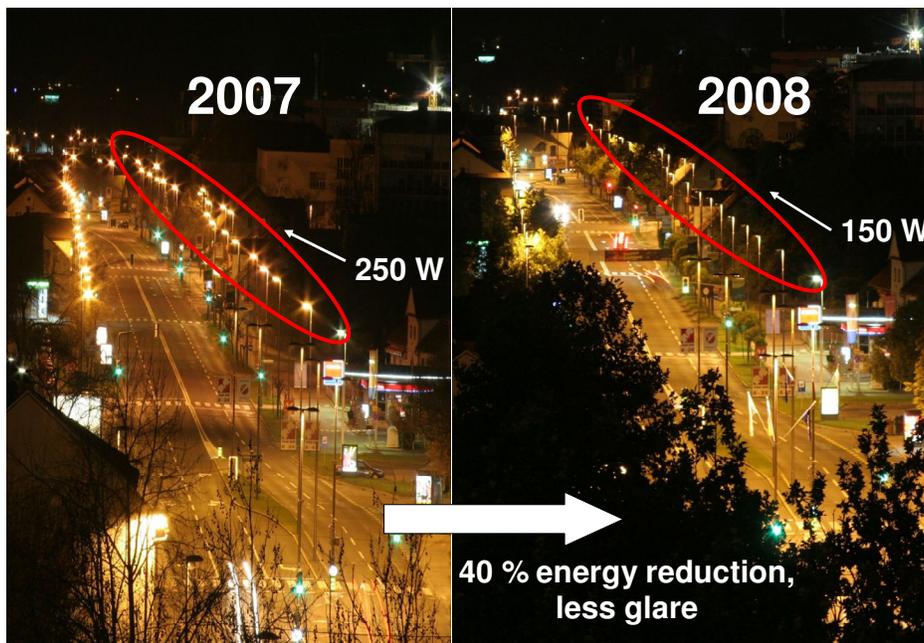
As the light from unshielded luminaries travels up to 200 kilometres in distance, the modifications will undoubtedly affect also a number of regions in Slovenia and the populations. We regret to note that the Region Friuli Venezia Giulia makes a **step back in respecting the established principle of good neighbourliness in international environmental law**. This specifies that a State has the duty to ensure that activities within its jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction. The envisaged changes are paving the way for increased levels of light pollution crossing the border from your region into Slovenia.

Light pollution as visible from Mount Matajur,
at the border of Italy and Slovenia



An all-sky photo from Mount Matajur clearly shows increased levels of light pollution coming from the direction of major cities in Friuli Venezia Giulia (Trieste, Gorizia, Udine, Pordenone).

We are surprised that your region has decided to **halt the success that the law is destined to generate**. The benefits of comprehensive and effective light pollution laws to the plant and animal populations and **biodiversity** in general are scientifically undeniable. No less obvious are the results of such laws in terms of **energy savings**. Slovenia, having passed on 30 August 2007 a decree similar to that of your region, is witnessing very real cuts in energy consumption. The positive impact can be confirmed by the monitoring activity of our NGO as well as by concrete projects, such as that carried out in the municipality of Šempeter-Vrtojba by the local energy agency GOLEA, demonstrating significant energy reduction (about 50%) while preserving the same lighting levels (please see <http://www.sempeter-vrtojba.si/?vie=gds&id=20081002124027>).



Two photos of Tržaška Road in Ljubljana: The left photo is from year 2007 with old luminaries using 250 W HPS bulbs. To the right is the situation in 2008 showing reconstructed road illumination using 150 W HPS bulbs with fully shielded luminaries, as stipulated by the Decree on the limitation of light pollution of the environment. Energy consumption has decreased by about 40% and emissions over the horizontal are 0%.

In addition, scientific research increasingly provides strong support to the fact that nocturnal illumination of bedrooms presents a **serious threat to human health**. By suppressing melatonin production and interfering with the circadian rhythms, intrusive street lighting penetrating bedrooms at inappropriate times can lead to sleep deprivation, depression and impaired thinking. A strong correlation has been demonstrated between night work and the incidence of cancer. As a result, the World Health Organisation has reported night work to be carcinogenic. Furthermore, recent research conducted at the University of Haifa, Israel, reveals higher occurrence of cancer in districts of intense public lighting. By prohibiting any light above the horizontal and thus preventing it from entering into bedrooms the light pollution law in force in Friuli Venezia Giulia at the moment adequately reflects these alarming scientific warnings. Changes that tolerate outdated luminaires to shine above the horizontal will trigger higher health risks for the citizens of Friuli Venezia Giulia. Finally, the suggested modification will do harm to the safety in traffic, as unshielded lighting glares and disturbs the drivers.

In view of the obvious manifold benefits of a stringent law for **energy reduction, animal and plant species, people's health and safety, which contribute to the wider goals of combating climate change and achieving sustainable development**, the attempts of the Region of Friuli Venezia Giulia to weaken it are unintelligible. They are particularly worrisome seeing as they are taking place only 16 months after the law guiding the same area has been passed. The proposed changes are a poignant deterioration of the legal regime, countering the practice of governments in developed countries that strive for progressive and effective environmental legislation.

The signed environmental organisations of Slovenia urge you to take our views into account and prevent the adoption of the law 37 in the currently proposed form.

Yours faithfully,

Dark-sky Slovenia
Focus Association for Sustainable Development
Natural History Society of Slovenia
Cipra Slovenia, Association for the protection of the Alps
Association of Environmental Societies of Slovenia
Mountain Wilderness Slovenia