

## Italy's observations.

Following the 'Blue economy expert meeting' held in Bruxelles on 29 September 2015, and after the excellent work done by DG MARE, Italy would like to highlight some observations about the 'non paper' document.

1. The non-paper states that day trips and business trips data for now are not comprised in the analysis. We ask to consider that data on day trips by passenger ships and/or leisure crafts are contained in the mass of data and information relevant to maritime and coastal transport. This is true also for the revenues from the retail activities . Or maybe is there a way to separate one-day and business tourists data from the whole?
2. Italy agrees with Nederland's remarks about the inclusion of the Shipbuilding sector in the analysis; in fact, a large amount of ships built in Italy are exported to Non-EU countries. In Italy the shipbuilding industry has a double productive specialization reflecting the size of the firms involved: large firms and big shipping manufacturing and maintenance vs small firms and 'small shipping' manufacturing and maintenance. They are both relevant for the Italian overall economic system.
3. As regards the primary sectors, we noted that the activities of institutions and governmental bodies have not been considered in the analysis. Please note that at least the activities listed in Article 8 of directive 2014/89/EU should be included.
4. Italy has a relevant national 'oil production' both off shore than onshore. Some information is available in the financial reports of the oil main national player (ENI spa)
5. In table #1, page 5 of 'non paper', the 'shipping' sector comprehends several activities, such as cargo handling and service activities, that should be considered as secondary activities. Moreover, maritime cargo handling should be separated by air cargo handling, for example by estimating it through its relevant share, e.g. the quote of maritime transported cargo (inward and outward) on the whole (air and maritime) cargo transported, inwardly and outwardly. We wonder also if the definition of 'indirect' in the same table refers to Secondary sector activities.
6. "The turnover and employment are calculated assuming that averages for similar types of accommodation (hotels, campsites etc.) are the same for coastal as for non-coastal accommodation in a given country". Maybe coastal tourism could present more seasonal characteristics than cultural tourism, e.g. tourism in historical sites, or in cities, or influenced by seasons in the opposite way, as it is for tourism in mountain locations, even if in the same country. Please note also a possible distortion for touristic data relevant to cities of art such as Rome, Venice and Naples, that are coastal municipalities, but have also remarkable economic and cultural features..
7. The figure #1 in 'non paper' shows that coastal municipalities are very geographically concentrated in certain MS. Italy demands which definition has been used to identify the 'coastal municipalities' and asks if the method used to identify them, and the list of coastal municipalities thus identified, can undergo a revision.
8. The structure of the non-paper and the notion of coastal municipalities does not deal with the port economy. The selection of indicators does not catch the relevance of port communities to the economy of each country. The port presence should be a strong reference in the notion of the coastal municipalities since it affects deeply the nature and the specialization of the local economic system. The Extra EU goods import export is managed mainly through ports and some 'pure' transport indicators should be supplied for a complete understanding of blue economy. The overall approach of the non-paper does not deal with a view oriented to highlight the impact of transport of blue economies, though in the literature is widely accepted the importance of the transport function. The approach, also for the indirect contribution to the GDP, should be find a way to shed light on the port activities
9. The lack of any analysis about cruises is an issue to the understanding of ports/coastal municipalities in accordance of the nature of their ports: starting point for cruises, only transit and indirect employment.
10. Italy agrees with Portugal's remarks in order to sum up different indicators for the various variables, it would be preferable to gather data about the same indicator for all the activities studied, where possible and reasonable.