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Tunnelling Activities and War Crimes: Why Pizzarotti Could Be Found Responsible for Grave Violations of International Law in the Occupied Palestinian Territory

Legal Opinion

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Preliminary Remark

This legal brief is based upon factual information that Al-Haq currently possesses. It is important to note that based on the amount of information acquired, we do not purport to reach absolute conclusions. However, given the information available, the following analysis aims to provide a tentative picture of the legal consequences that may arise from the violations described below.

Introduction

As a human rights organisation dedicated to the promotion and protection of human rights in the Occupied Palestinian Territory (OPT), Al-Haq is gravely concerned by the involvement of the private Italian firm Pizzarotti & C. S.p.A., acting through the partnership Shapir Pizzarotti Railways Construction (S.P.R. Construction), in the tunnelling activities for the construction of Railway A1 Tel Aviv–Jerusalem (hereinafter Railway Line or the Project). The Railway Line crosses through the villages of Yalu Beit Surik and Beit Iksa (Jerusalem Governorate) in the occupied West Bank. Such involvement could amount to complicity in Israel's violations of international law in the OPT and lead to the commission of war crimes entailing the individual criminal responsibility of the Company's high level directors and executives.

1. The Construction of a Railway Line in the Occupied Palestinian Territory

Israel, as the Occupying Power in the West Bank, including East Jerusalem and the Gaza Strip, is bound by customary international law in general and by those relevant provisions of conventional law, namely the provisions contained in the Hague Regulations annexed to the Hague Convention IV Respecting the Law and Customs in War on Land of 1907 (hereinafter The Hague Regulations) and the Fourth Geneva Convention and those provisions of the First Additional Protocol to the Geneva Conventions reflecting customary international law.

In particular, Article 43 of The Hague Regulations establishes the obligation of the Occupying Power to administer the territory in the interest of the occupied population; such an obligation can be trumped only in case of imperative security reasons of the Occupying Power. Looking at the beneficiaries of the new infrastructure, while it is true that there are a number of Palestinian citizens of Israel who may also benefit from the

Project, Palestinian citizens of Israel do not form part of the occupied population under international humanitarian law. The protected population includes only those Palestinians living in the OPT, namely the Gaza Strip and the West Bank, including East Jerusalem. The latter, by virtue of Israel's illegal annexation in 1967, has been increasingly integrated into the territory of Israel. The Palestinian population of Jerusalem has been allowed access into Israel unlike the rest of the occupied population of the West Bank. While Palestinian Jerusalemites can use the Railway Line, they represent an incidental portion of the potential users and cannot be considered the primary beneficiaries of the Project or of the changing situation in the occupied territory. The new infrastructure will in fact be detrimental for the interests of the local Palestinian population, who will lose a considerable part of their land as a result of the construction, without gaining any (or, in the case of Palestinian Jerusalemites, just minimal) benefit from the Project. Thus the State of Israel, as the Occupying Power, breaches its obligation to administer the territory in the interest of the Occupied population under Article 43 of The Hague Regulations.¹

Another relevant issue concerns the mined material extracted through the tunnelling activities required by the Project. As pointed out in Who Profits from the Occupation's report "Crossing the line: The Tel Aviv-Jerusalem Fast Train, a new Israeli train line through Occupied West Bank Areas,"² the mined material is to be reprocessed and sold whenever possible, or used as filling by the contractor in other areas. The Project involves the construction of four tunnels. About 700,000 cubic meters (cbm) have been extracted from Tunnel 1 alone, almost entirely from within the Occupied Palestinian Territory.³ It is estimated that another 515,000 cbm will be extracted from Tunnels 2 and 3 where Pizzarotti's work has been required. Tunnel 3 crosses the Green Line and enters into the OPT as it exits into Cedars Valley, in an area near the Palestinian village of Beit Surik. As explained by Who Profits, "[t]his tunnel requires the construction of a network of access roads for the special tunnel boring machines and

¹ The Israeli planning committee, when discussing this international-law-based concern, dismissed it based on a proposed plan for a future expansion of the Israeli railway system supposedly planned to connect also the Palestinian cities of Gaza and Ramallah. Presently, given the conditions of occupation, the system of permits and restrictions of freedom of movement in the West Bank and the closure of the Gaza Strip, this plan does not seem practically viable. See Who Profits, 'Crossing the line: The Tel Aviv-Jerusalem Fast Train, a new Israeli train line through Occupied West Bank Areas', (October 2010), 8, <<http://www.whoprofits.org/sites/default/files/Train%20A1.pdf>> accessed 11 October 2012.

² *Ibid.*

³ According to Who Profits the first double tunnel whose length is about 3.5 kilometers starts in the occupied Latrun enclave to end near Guy Gate (Jerusalem) and lies almost all within the West Bank side of the Green Line; mining works for the construction of this tunnel have started in February 2012. The mining is executed by a TBM (Tunnel Boring Machine) of the German company Herrenknecht, which also operates the machines on site. See Who Profits (n.1), 25.

for the removal of vast amounts of dirt and waste from the tunnel, leading away from the portal in Cedars Valley, all inside the occupied area and on Palestinian land.”⁴ Two thirds of the material extracted by the tunnelling activities for Tunnels 2 and 3 is expected to be reusable material, that will be reutilised by the contractor or sold.⁵ The law of occupation explicitly forbids the exploitation of natural resources of the occupied area by the occupier for its own gain. This principle is enshrined in Article 55 of the Hague Regulations, which states that “the occupying State shall be regarded only as administrator and usufructuary of public buildings, real estate, forests, and agricultural estates belonging to the hostile State, and situated in the occupied country.” The products of mines and quarries are not renewable fruits that the Occupying Power could lawfully retain according to the law of usufruct. On the contrary, they should be considered as non-renewable resources which are part of the land and whose substance cannot be exploited for the benefit of the Occupying Power and of foreign nationals, in this case by private contractors involved in the construction of the Railway Line.

2. Does the New Railway Line Involve the Commission of War Crimes?

With regard to the contribution of Pizzarotti to the commission of war crimes, three provisions appear particularly relevant to the present situation. Article 147 of the Fourth Geneva Convention enumerates among the grave breaches,⁶ “the extensive destruction and appropriation of property, not justified by military necessity and carried out unlawfully and wantonly.” In addition, Article 8(2)(b)(xiii) of the Statute of the International Criminal Court (hereinafter ICC Statute) defines the “destroying or seizing the enemy's property unless such destruction or seizure be imperatively demanded by the necessities of war” as a war crime. Moreover Article 8(2)(b)(xvi) of the ICC Statute defines as a war crime “pillaging a town or place, even when taken by assault.”

The first question which should be asked is whether the construction of the Railway Line in the OPT with all its related activities (including tunnelling and extracting

⁴ Who Profits (n.1), 8.

⁵ *Ibid.*

⁶ Grave breaches of the Geneva Conventions are the most serious form of war crimes and are subject to universal criminal jurisdiction. This entails the possibility for a national court to investigate and prosecute an offence regardless of any territorial or nationality link with the perpetrator, the victim or the territory where the offence was committed.

materials) authorised by the Israeli Government fulfils the requirements of the abovementioned criminal acts.⁷

2.1 Pillage

The categorisation of pillage as an international criminal offence has a longstanding tradition; conceptualised in the Lieber Code of 1863, pillage has been included in the statutes of various international criminal tribunals such as the International Criminal Tribunals for the Former Yugoslavia and Rwanda and the Special Court for Sierra Leone. Therefore, the prohibition of pillage is now universally accepted as forming part of customary international law.⁸

Article 8(2)(b)(xvi) of the ICC Statute codifies the war crime of pillage in the context of international armed conflicts as comprised of five main elements:

- 1) the perpetrator appropriated certain property; in particular, looking at the jurisprudence of the International Military Tribunal of Nuremberg,⁹ the appropriation can also be indirect, through the receipt or purchase of unlawfully appropriated property by others;
- 2) the perpetrator deprived the owner of the property and appropriated it for personal use;
- 3) the appropriation was without the consent of the owner;
- 4) the conduct took place in the context of an armed conflict;
- 5) the perpetrator was aware of the circumstances which established the existence of the armed conflict.

⁷ According to Article 25 of the ICC Statute, the Court has jurisdiction over natural person only. It means that, by applying the framework of the ICC Statute to the present case, only those individuals acting as company representatives, not the company as a legal person, can be held criminally responsible for war crimes and complicity in war crimes.

⁸ See International Committee for the Red Cross (ICRC), 'Customary International Humanitarian Law Rules,' Rule 52.

⁹ See **United States of America v C. Krauch at al.**, (I. G. Farben case), US Military Tribunal at Nuremberg (Judgment, 29 July 1948), in *Trials of War Criminals Before the Nuremberg Military Tribunals*, Vol. X, 44 [private businessmen criminally responsible for pillage]; **United States of America v A. Krupp et al.**, US Military Tribunal at Nuremberg (Judgment, 31 July 1948), in *Trials of War Criminals Before the Nuremberg Military Tribunals*, Vol. IX, [private businessmen criminally responsible for pillage].

Looking at the information available, these five main elements appear to be fulfilled in the case under examination. In particular:

1) Israeli Military Confiscation Order 321 (Decision n. 10-02-H) of 2010 appropriated 50,000 square meters belonging to the Palestinian village of Beit Iksa. In addition, Beit Surik Village Council has estimated that about 90-100 families and their land will be affected by the construction of the Railway Line.¹⁰ The appropriation of property includes also the mined material which will be exploited from the tunnelling activities conducted underground.

2) The property was appropriated to provide a more effective transportation system for Israeli citizens and for the economic interests of the contractors involved in the mining activities. The property was not appropriated for the benefit of the Palestinian population of the villages of Yalu, Beit Surik and Beit Iksa as required under international humanitarian law.

3) The fact that the appropriation took place without the consent of the owners is substantiated by the numerous initiatives undertaken by the local Palestinian population aimed at challenging the legality of the confiscation orders.¹¹

4) Israel is using its position as Occupying Power of the Palestinian territory by deciding to construct the route of the Railway Line over lands belonging to the villages of Yalu, Beit Surik and Beit Iksa and is doing so for reasons other than the benefit of the local Palestinian population. Thus, the link between the railway construction and the situation of occupation and protracted armed conflict is evident.

5) Companies like Pizzarotti, that are involved in the project for the construction of the Railway Line, know or should know about the existence of these circumstances. This is especially true in the case of enterprises that should comply with the high diligence

¹⁰ See Who Profits (n.1), 14.

¹¹ In particular, the Palestinian land owners, together with the Israeli organization Peace Now, have repetitively appealed to the Israeli planning committee, claiming that land owners were not properly informed and the land confiscations did not comply with the procedures specified by Israeli military law. All of the appeals were dismissed. See Who Profits (n.1), 8; 'An Objection to the Expansion of the Israeli Railways Tel Aviv-Jerusalem Line', Peace Now News (May 2009) <<http://www.peacenow.org.il/site/en/peace.asp?pi=66&docid=3646>> accessed 11 October 2012.

standards related to the exercise of their professional activity as laid down in their national law.¹²

Finally, with specific regard to the involvement of Pizzarotti in the process of exploitation, it is important to note that both international jurisprudence¹³ and recent studies¹⁴ have confirmed that the participation or contribution by private corporations in the process of illegal expropriation of natural resources in areas of armed conflicts or occupation can entail the war crime of pillaging.

2.2 Destruction and Appropriation of Property under ICC Statute

Article 8(2)(b)(xiii) of the ICC Statute defines as a war crime the action of “destroying or seizing the enemy's property unless such destruction or seizure be imperatively demanded by the necessities of war.” The construction of the Railway Line entails appropriation of privately owned land belonging to Palestinians from the occupied areas of Yalu, Beit Surik and Beit Iksa. In particular, as already stated above, Confiscation Order 321 confiscated a total of 50,000 square meters of land surrounding the village of Beit Iksa, while Beit Surik Village Council has estimated that about 90-100 families and their land will be affected by the construction of the Railway Line in Beit Surik. Such appropriation of land cannot be considered as imperatively demanded by military necessity as the purpose of the Railway Line is to facilitate the transport of Israeli citizens on the route Tel Aviv-Jerusalem, taking into account that the Railway Line could have been alternatively built on routes which do not cross through the OPT.¹⁵ Therefore, as the excuse of imperative military reasons does not apply in the present case, the construction of the Railway Line on Palestinian land can amount to the war crime of destruction of property as defined in Article 8(2)(b)(xiii) of the ICC Statute.

¹² As the focus of this legal brief is the involvement of the Italian company Pizzarotti in the Railway Line project, it is worth referring to the rules establishing the level of diligence imposed to a person exercising a professional activity in the Italian legal system. In particular, Article 1176(2) of the Italian Civil Code expresses the principle that, when exercising a professional activity, a person should comply with the standard of diligence required by the activity itself that is higher than the average level of diligence required by paragraph (1) of the same Article.

¹³ See *United States of America v C. Krauch at al.* (n.9); *United States of America v A. Krupp et al* (n.9).

¹⁴ See James G. Stewart, 'Corporate War Crimes: Prosecuting the Pillage of Natural Resources', Open Society Justice Initiative Publication (2010) <<http://www.soros.org/sites/default/files/pillage-manual-2nd-edition-2011.pdf>> accessed 11 October 2012.

¹⁵ It should be noted that the Israeli town of Mevaseret Zion, located on the Western side of the Green Line but nearby the Palestinian villages of Beit Surik and Beit Iksa, in 2005 has filed objections against the original route and partially succeeded in distancing the planned route of the train from residential buildings due to noise pollution. See *Who Profits* (n.1), 11.

2.3 Extensive Destruction and Appropriation of Property as a Grave Breach

Article 147 of the Fourth Geneva Convention lists among the grave breaches “the extensive destruction and appropriation of property, not justified by military necessity and carried out unlawfully and wantonly.”

Given the limited amount of information in possession of Al-Haq, it is not possible to formulate conclusions with regard to the unlawful and wanton character of the appropriation. In case these two elements are proven, the following legal reasoning applies.

In light of the figures on the amount of land appropriated under Confiscation Order 321 in relation to Beit Iksa and through the evaluation made by Beit Surik Village Council, the construction of the Railway Line may involve extensive destruction and appropriation of property in occupied territory. This, as already stated above, is not justified by military necessity as the purpose of the Railway Line is to facilitate the transport of Israeli citizens on the route Tel Aviv-Jerusalem. In regards to whether this is carried out unlawfully and wantonly, the two requirements that make destruction and appropriation of property being not only a war crime but also a grave breach of the Fourth Geneva Convention, it might be relevant to recall that in 2004, in a case concerning the route of the Annexation Wall in the areas surrounding the village of Beit Surik, the High Court of Israel ruled in favour of the village of Beit Surik by declaring that the route of sections of the Annexation Wall should be changed in order to avoid unnecessary hardship to the inhabitants of the village.¹⁶ In the ruling the Court stated that “no attempt was made to seek out and provide [the Palestinians] with substitute land, despite our repeated proposals on that matter” and that, “the route of the separation fence severely violates the right of property and freedom of movement” of the inhabitants of Beit Surik rendering “their livelihood severely impaired.”¹⁷

Carefully examining the extent of the route of the Railway Line replicating the one originally planned for the Annexation Wall, one may be able to apply the same reasoning with regard to the construction of a Railway Line located in the same area, taking into account that the village of Beit Surik has already lost 31 per cent of its land

¹⁶ *Beit Sourik Village Council v. The Government of Israel*, HCJ 2056/04, 30 May 2004.

¹⁷ *Ibid.*, paragraph 60.

due to the construction of the Annexation Wall. Hence, the decision taken by the Israeli Civil Administration Central Planning Board to authorise the passage of the Railway Line through the two Palestinian villages of Beit Iksa and Beit Surik rather than on alternative routes may be considered malicious in its nature, especially if one takes into account that the Israeli town of Mevaseret Zion, located nearby the abovementioned Palestinian villages, has already succeeded in distancing the planned route of the train from residential buildings due to noise pollution.

Therefore, the construction of the Railway Line involves actions that may indeed amount to grave breaches of the Fourth Geneva Convention. What render grave breaches different from war crimes in terms of legal remedies is the obligation of States parties to the Fourth Geneva Convention to provide for universal jurisdiction in their national legislation for grave breaches without need for any territorial or nationality link.¹⁸

3. Pizzarotti's Alleged Criminal Responsibility

Once demonstrated that the Railway Line activities could amount to war crimes or grave breaches, it must then be ascertained the role played by the private corporation, in this case Pizzarotti S.p.A.

As explained earlier, under Article 25 of the ICC Statute only natural person can be criminally responsible. This means that, by applying the framework of the ICC Statute to the case of Pizzarotti, only those individuals who are members of Pizzarotti S.p.A. Board of Directors or high level executives, not the company as legal entity, can be held criminally responsible.¹⁹

International criminal law, international and national jurisprudence envisage two different modes of liability with regard to the commission of war crimes and grave breaches. Namely, principal liability and assistance or complicity in the commission of the crime. With regard to the crime of pillage it is reasonable to sustain that Pizzarotti is

¹⁸ See footnote 6; see also J. Henckaerts - L. Doswald-Beck, 'Customary International Humanitarian Law', (Cambridge University Press, Cambridge, 2005), 605-607 (Rule 157).

¹⁹ In particular, it should be noted that some national legislations recognise criminal responsibility for legal persons such as companies. However, this is not the case for the Italian legislation to which the case of Pizzarotti potentially applies.

acting as principal perpetrator²⁰ in the sense that, as the company in charge of conducting the tunneling construction for Tunnels 2 and 3 of the Railway Line, is itself extracting the mined material and thus appropriating property belonging to the occupied Palestinian population.

In relation to the crime of destruction and appropriation of property, given the degree of contribution of Pizzarotti to the allegedly criminal conduct, complicity appears as the most appropriate scenario. Article 25(3)(c) of the ICC Statute expressly declares that a person shall be criminally responsible if “for the purpose of facilitating the commission of such a crime, aids, abets or otherwise assists in its commission or its attempted commission, including providing the means for its commission.” This provision was elaborated throughout a long process of refinement undertaken through the jurisprudence of different national and international courts and is now considered of a customary nature.²¹

More specifically, the mental element (*mens rea*) for complicity requires the knowledge of the perpetrator’s criminal intent and of the abettor’s contribution to that intent. It is necessary to prove that Pizzarotti knew that the construction of a railway line through the OPT represented a violation of international humanitarian law, or that the company acted in serious negligence by failing to ascertain whether or not such a construction had such relevance under international law. In this regard, Pizzarotti has demonstrated to be perfectly aware of the problematic character of the Project under international law. In a press statement dated 17 March 2011 the Italian company, in response to the claims and petitions filed by human rights groups, argued that the sections of the tunnels it had been contracted for fell integrally within the Israeli side of the Green Line.²² Moreover, Pizzarotti should have taken into account the fact that another major contractor such as Deutsche Bahn, a company owned by the German Government, chose to back out from the Project due to its problematic character under international

²⁰ Article 25(3)(a) of the ICC Statute defines as principal perpetrator a person who commits a certain crime whether as an individual, jointly with another or through another person.

²¹ Provisions concerning aiding and abetting international crimes have been included in the Charter of the International Military Tribunal of Nuremberg (Article 6), the Charter of the International Military Tribunal for the Far East (Article 5), the Statutes of the International Criminal Tribunals for the Former Yugoslavia and Rwanda (Articles 7 and 6) and the Statute of the Special Court for Sierra Leone (Article 6). See also L. Manzella, ‘The International Law Standard for Corporate Aiding and Abetting Liability,’ *EarthRights International* (July 2006) 4.

²² See *La Repubblica Parma.it*, ‘Ferrovia Tel Aviv-Gerusalemme. Pizzarotti: non decidiamo noi il tracciato’, (17 March 2011) <http://parma.repubblica.it/cronaca/2011/03/17/news/ferrovia_tel_aviv_-_gerusalemme_pizzarotti_non_decidiamo_noi_tracciato-13713369/> accessed 11 October 2012.

law.²³ In light of such information, it is difficult to believe that Pizzarotti was not in a position to know the situation in the West Bank and the consequences, in terms of obligations and responsibilities under international law, of the activities conducted by the Occupying Power and its contractors in a territory under military occupation.

Both international jurisprudence and prominent scholars pointed out that it is not necessary for the aider and abettor to share the perpetrator's criminal intent nor for that particular contribution to be essential for the commission of the crime.²⁴ Hence, it is not necessary to demonstrate that Pizzarotti itself wanted to engage in the commission of a war crime as its actions can also be directed to accomplish other scopes such as for example making a financial profit. Moreover, it is not necessary for Pizzarotti's contribution to be essential for the accomplishment of the criminal plan. Thus the potential excuse that the tunnelling activity could have been done by any other contractor cannot be used to exclude Pizzarotti's legal responsibility.

4. Conclusions: What Actions Should Be Taken?

In conclusion, there are substantial grounds on which to determine that Pizzarotti & C. S.p.A. could be held responsible both as principal perpetrator and as aider and abettor in acts that can amount to serious violations of international law such as the war crimes of pillage and of destruction and appropriation of property according to both the Fourth Geneva Convention and the ICC Statute. Article 12(2) of the ICC Statute states that the Court has jurisdiction over crimes committed either on the territory or by nationals of States Parties. Bearing in mind that the ICC Statute accords to States Parties primary responsibility for the investigation and prosecution of the crimes, Italy, as a State Party to the Statute, has a duty to exercise criminal jurisdiction over actions committed by its nationals (in this case the members of Pizzarotti Board of Directors and high level executives) that could amount to crimes within the jurisdiction of the Court.

²³ More in particular the German Minister of Transport, Peter Ramsauer, has defined the Project as "problematic from a foreign policy perspective and potentially in contravention with international law." See N. Hasson, 'Deutsche Bahn pulls out of TA-Jerusalem railroad', *Haaretz* (12 May 2011) <<http://www.haaretz.com/print-edition/news/deutsche-bahn-pulls-out-of-ta-jerusalem-railroad-1.361170>> accessed 11 October 2012.

²⁴ *Prosecutor v. Simic* (Judgment, Appeals Chamber) ICTY, 28 November 2006, paragraph 86; *Prosecutor v. Aleksovski* (Judgment, Appeals Chamber) ICTY, 24 March 2000, paragraph 162; A. Cassese, 'The Proper Limits of Individual Responsibility Under the Doctrine of Joint Criminal Enterprise' (2007) 5 *Journal of International Criminal Justice*, 109. See also Report of the International Commission of Jurists Expert Legal Panel on Corporate Complicity in International Crimes, 'Corporate Complicity and Legal Accountability, Volume 2: Criminal Law and International Crimes', (Geneva, 2008) 19.

Leaving aside the specific framework of the ICC Statute, all States are under a customary international law obligation to investigate and prosecute alleged perpetrators of grave breaches of the Geneva Conventions. Concurrently, States have also a duty to provide effective civil remedies²⁵ for those who were victims of the aforementioned violations. But, apart from judicial remedies, there are a wide range of measures which encompass public campaigns, political condemnation and administrative sanctions that can be undertaken in order to pressure Pizzarotti into ceasing their support of Israel's criminal activities in the OPT.

Al-Haq warmly welcomes the resolutions adopted by the municipalities of Rho, Naples, Arenella-Vomero and Corchiano expressing political and moral condemnation for Pizzarotti's conduct.²⁶ It also encourages other Italian municipalities and public authorities to follow these examples. It is important to adopt the necessary legal and political steps, including the enforcement of administrative regulations, such as *// Codice dei Contratti Pubblici* (D. Lgs. 12 April 2006, n. 163), in order to hold Pizzarotti accountable by preventing it from participating in other projects and public tenders. Such measures can be a way to uphold the obligation that each High Contracting Party has under Common Article 1 of the Geneva Conventions to ensure respect for the Conventions in all circumstances. Al-Haq is confident that such actions will induce Pizzarotti to revise its strategy and, at the same time, will effectively deter and discourage further engagement by other companies in illegal activities that can amount to war crimes with a view of preventing future violations.

²⁵ With regard to civil remedies it is interesting to note that the Superior Court of Quebec in the *Bil'in case* stated that a war crime can constitute a civil wrong under Canadian national law. See *Bil'in (Village Council) v. Green Park International Ltd.*, Superior Court of Quebec (Judgment 18 September 2009) QCCS 4151, paragraphs 175-176.

²⁶ For the text of the resolutions passed by Rho, Naples, Arenella-Vomero and Corchiano municipalities respectively on 30/11/2011, 13/02/2012, 29/03/2012 and 30/05/2012 see <<http://stopthatrain.org/wp-content/uploads/2011/12/risoluzione-rho.pdf>> ; <<http://stopthatrain.org/wp-content/uploads/2012/02/ordine-del-giorno-su-Pizzarotti-C..pdf>>; <http://www.comune.napoli.it/flex/files/5/4/6/D.4fb0f49f945bb314ad92/verbale_29_marzo_2012.pdf>; <http://213.203.143.153/c056023/de/at_p_delib_dettag.php?x=2b25fa4210c471dff166412e84d0e7af&ATPRSER=5496&pag=&ATPR TIP=&ATPRNUD=&anno_delibere=&delibera_dal=01/05/2012&delibera_al=31/05/2012&ATPRGDE=&ATPRCAS=&ATPRCUF=&servizio=26#> accessed 11 October 2012.