

Barroso

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**Subject:**

Request to appear as observer in PRE/ACCC/C/2021/186

Dear Mr. Jonas Ebbeson and colleagues,

We have become aware of the existence of communication ACCC/C/2021/186 regarding access to environmental information on the “Mina do Barroso” lithium project, located in the Portuguese municipality of Boticas, district of Vila Real.

**The Association UNIDOS EM DEFESA DE COVAS DO BARROSO** is a non-profit environmental association registered in Portugal with the tax ID 515180513, created in 2018 following the concerns of the local community of Covas do Barroso after witnessing a very aggressive and prospection campaign over a very large area, closer to their homes. The community was led to believe that the said campaign was under a 2006 license and DIA. The license had been altered but neither the local authority nor the communities were informed or consulted and they were not made aware of a 2016 mining contract signed without a new EIA being issued. It took the intervention of an MP and questions being asked in parliament for the matter of the license to be clarified and for the community to realise that the government and the office responsible for issuing licenses does so without any consideration for the environmental, placing responsibility for its safeguard with the communities themselves, which in turn are to be advised by mining company. In May 2020 the community were told the EIA was being finalised by the mining company. Concerns arose from the knowledge that the said EIA had been done without access to the majority of the land where the project was planned. On the 1<sup>st</sup> June 2020 they were informed through a bulletin by the mining company that the more than 6 thousand page document was submitted to the Portuguese Environmental Agency, together with the assurance that 95% of EIA submitted in Portugal are approved. Request to make the document available prior to the planned 30 day consultation period, expected to take place within the next 90 days, were denied and anxiety grew as time passed well beyond the timescale given, without any news of when they would get to see the document.

Nine months passed before the EIA was made complaint and came out for consultation in a rather confusing and random order in the site of the Portuguese Environmental Agency. Over the course of that time hundreds more pages had been added to the already cumbersome document and, as it turned out, many were not in Portuguese, the national language. Paper copies were not made available and so people without access to the internet could not have access to the document. We later discovered that documents were added to the site two weeks after the consultation period opened.

During the consultation period APA promoted two information sessions which were led by the mining company consultants. One over the internet, limited to a few hundred people, resulted in many questions being left unanswered. The second session on 12<sup>th</sup> May was limited to 40 people. Despite the consultation period being extended for another 30 days, it did little to overcome to obstacles to free and fair access to information.

We would request that we are made observers of the communication ACCC/C/2021/186.

Kind regards,

Nelson Gomes  
President

