



Associação Unidos em Defesa de Covas do Barroso

Antiga Casa do Povo

Largo do Cruzeiro

Covas do Barroso

54600-381

Portugal

udcovasdobarroso@gmail.com

Aarhus Convention Secretariat

United Nations Economic Commission for Europe

Palais des Nations

8-14 avenue de la Paix CH –

1211 Geneva 10, Switzerland

aarhus.compliance@un.org

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Subject:

ACCC/C/2021/186

Dear Mr. Jonas Ebbeson and colleagues,

Following APA's latest response communication and the restricted and painfully constrained access to drip-fed information regarding the EIA process for "Mina do Barroso, we would like to express our deepest concerns and dismay.

The unavailability of live or timely information regarding the EIA process of Mina do Barroso has caused undue stress and anxiety to the community directly affected by it. In June 2020 we were told by the proponent that a 6,000 page EIA was handed to APA. We were also told that in line with legal deadlines the document would be available for consultation within 60 days, but by January 2021, when Montescola made the first request to APA, nothing had happened. It was disconcerting that we had to wait over 9 months to find out the document had been deemed non-compliant at least twice while we held our breath to find out what it said and what stage were at in the process.

It is equally disconcerting to see that APA is unwilling to make unfavourable rulings against the EIA public while at the same time is being pressured by the Portuguese mining licensing authorities (Direção Geral De Energia e Geologia and Laboratório Nacional de Energia e Geologia) to change it.

(Cf <https://nbox.apambiente.pt/s/3T2fiNs3re7oAzb?dir=undefined&openfile=717550>

S072880_202012_DAIA.DAP_apreciaçãoConformidade.pdf, pages 17 &18)

It is clear that the “Mina do Barroso” EIA process is not transparent and APA is unwilling to change its course of action insisting on procedural errors and technicalities which obscure the process further.

To add to evidence already provided by Montescola on the respondent’s consistent dismissal of requests to access administrative documentation, we would like to add that our association has also approached APA to request information regarding the said EIA and a DIA monitoring assessment for an earlier mining license and have been ignored . We only received a response following a second request and CADA’s intervention. The the respondent argued that access to some of the documents would was deferred (see attached documentation).

On the whole, it is despairing to find that in order to access information regarding EIA processes it is necessary to turn to costly legal procedures and know-how which are insurmountable obstacles for ordinary citizens and grassroots movements and associations such as ours.

We would ask that the committee takes this statement into consideration.

Kind regards,

Nelson Gomes

President