

26<sup>th</sup> November, 2014

**Subject: Non-compliance of commitments by EDP and the Portuguese State on the Alto Douro Wine Region, concerning the Foz Tua dam high voltage power line.**

To UNESCO

The World Heritage Committee and the World Heritage Centre

Dear Sirs/Madams,

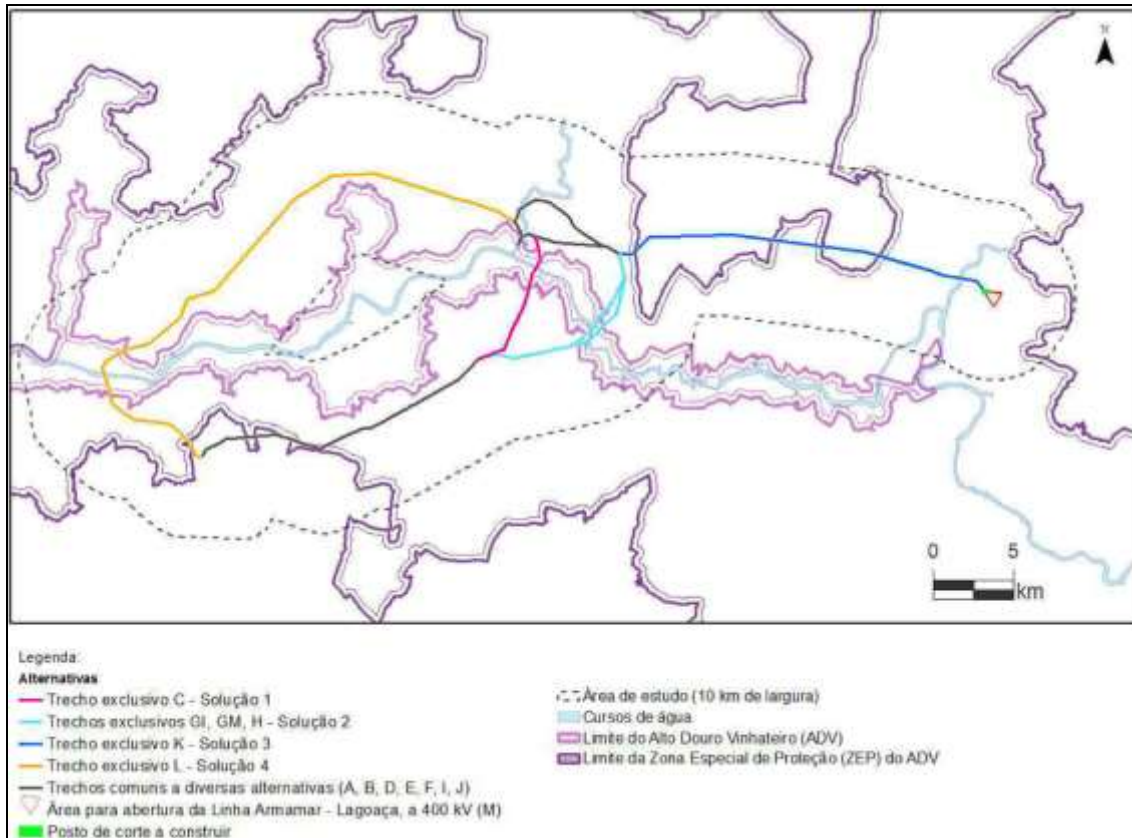
*Platform Save the Tua* (PST) aims to protect the Tua Valley and its centennial railway, enhance this heritage and prevent the construction of the dam that will inevitably destroy it. The Tua Valley is part of the Alto Douro Wine Region (ADWR), classified as a World Heritage Site by UNESCO in 2001.

Reports by ICOMOS and the World Heritage Centre (WHC) in 2011 and 2012 identified a conflict between the Foz Tua dam and the integrity of the ADWR property. However, in 2012 the World Heritage Committee was misled into admitting compatibility between the dam and the ADWR. PST has repeatedly presented evidence that key demands by UNESCO on impact mitigation of this dam have not been and almost certainly are not going to be met. The key facts have been exposed in the "Report on non-compliance of commitments by EDP and the Portuguese State on the Alto Douro Wine Region and Foz Tua dam", sent to UNESCO in May 2014. Attached herewith are the most relevant documents.

Unfortunately, the answer we received from UNESCO in July does not address any of the substantive issues, nor does it refute any of our allegations.

The incompatibility between the dam construction and the preservation of ADWR as World Heritage has been once again highlighted. In October this year, PST was officially notified that the Portuguese State approved an aerial High Voltage Power Line (linha de muito alta tensão, LMAT) connecting the hydropower plant to the national electrical grid. All corridor options studied cross the ADWR property or buffer zone; and the option of a subterranean power line was not considered: two blatant infringements regarding specific conditions of the Foz Tua dam environmental impact declaration (*Declaração de Impacte Ambiental, DIA*).

As shown in Figure 1, **the corridor adopted (option 2SM) crosses right through the heart of the ADWR**; it has a total of 39.7 km, all inside the ADWR property or within the buffer zone.



**Figure 1 — Location of alternatives studied for the Foz Tua power line (bright colour and black lines) in relation to the Alto Douro Wine Region core and buffer zones (dull pink and purple double lines). Source: ECOBASE 2013.**

The decision taken by the Portuguese State is nothing but incomprehensible, since it does not comply with express requests set by UNESCO two years ago (cf. WHC/IUCN/ICOMOS 2012):

*The project for the power line is still not finalised. The mission recommends that a line with a **minimal impact onto the WH property** should be adopted. The potential visual impact of the various options needs to be evaluated formally and the preferred option submitted to the World Heritage Centre for appraisal. (Conclusions, p. 36)*

*The mission team **strongly recommends to not cross the Alto Douro World Heritage property** or to use an existing line: plans need to be carefully reviewed (Comments and recommendations, p. 54).*

UNESCO also requested "(...) the State Party to submit the **missing documentation required especially on the high voltage power line grid** and the Landscaping Master Plan of the affected construction area and its surrounding to the World Heritage Centre as soon as possible and at the **latest by 1 February 2013** for review by the Advisory Bodies (...) The **construction works on the FTDD project should slow down** until it is demonstrated that the specific recommendations of the mission presented in this report, **in particular concerning the high voltage transmission power lines**, are taken into account" (cf. WHC/IUCN/ICOMOS 2012, p. 45). In fact, the works at Foz Tua dam have obviously been carried out without hindrances, since its conclusion is scheduled to January 2016.

The worst problems at the Foz Tua works have been a long succession of accidents, that to date claimed four lives and eight seriously injured workers.

We must recall that of the four main alternatives examined in the Environmental Impact Study (EIS), three (solutions 1, 2 and 4) cross the core of the ADWR; the other (solution 3) crosses highly sensitive areas for birds, in violation of Foz Tua dam DIA. Cumulative impacts of both the Baixo Sabor and the Foz Tua dams and the LMAT were not assessed with adequate depth and are now an even larger problem than before. The importance of this issue was clearly acknowledged by the reactive mission (cf. WHC/IUCN/ICOMOS 2012):

*(...) threats lie especially in the cumulative effects of current and future infrastructure development, including access roads, bridges and power lines due to a number of dam projects beyond the World Heritage property (...)* (Assessment of the State of Conservation of the Property, p.39)

*The mission was concerned about potential cumulative effects of dam developments (Tua River, Sabor River), related power lines, road construction (highway across the site) on the attributes of the site and the property's integrity.* (Conclusions and recommendations, p. 40)

The LMAT EIS does acknowledge the most significant environmental impacts (cf. EIS: Non-technical Report LMAT, ECOBASE, 2014):

*The main effects (impacts) of the project are:  
(...)*

- Affectation of the visual framework of archaeological and architectural heritage elements and of scenic value of attributes that give Outstanding Universal Value to the Alto Douro Wine Region;*
  - Possible collision of birds and bats with the power line;*
- (translated, p. 23)

*As for cumulative impacts, the major projects considered were the hydroelectric exploitations of Foz Tua (all solutions) and the Baixo Sabor (in 3N and 3S solutions), existing and planned wind farms in the vicinity of the studied area, other high-voltage power lines, mining projects and degraded areas. The main **cumulative impacts identified are related to birds** (habitat loss and collision with lines), landscape planning (new channels), and **the Alto Douro Wine Region scenery**. (translated, p. 24)*

We note that the optimistic findings of LMAT DIA, which approved the project, are not based on the technical results of the study itself. The analysis of the impacts should have been enough to declare the unfeasibility of the project according to existing conditions. Even the LMAT DIA admits intolerable flaws in the project submitted to appraisal, by demanding the delivery of an extensive survey "(...) mapping, at project scale, the attributes that give OUE [Outstanding Universal Value] to the ADWR concerning the 2SM corridor that could not be fully identified in the EIS". (translated from LMAT DIA, 2014, p. 5, 15.).

Last but not the least, we must point out, again, that the Foz Tua dam and power plant have a huge negative impact on the region (as fully acknowledged by UNESCO missions in 2011 and 2012), and is totally useless regarding the official targets of the national energy plan and the needs of the Portuguese energy system.

In short, the Foz Tua dam and power line have unacceptable flaws for a project located within a World Heritage Site. The dam is useless and harmful both socially and ecologically; the solution adopted for the power line crosses the heart of the ADWR, representing a serious threat to birdlife and to the high scenic quality of the region; studies came about two years later than originally requested and while the works in the dam were ongoing at full speed. The decision taken by the Portuguese State neglects and threatens the Outstanding Universal Value of the ADWR Property, as well as guidelines and mandatory requirements established by UNESCO, European law and Portuguese authorities on this matter.

There is a primary reason why sites such as the ADWR are classified World Heritage: to prevent it from destruction and assure future generations might benefit from it. UNESCO must take action now against the proposed power line and dam, before irreversible damage makes it too late.