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# Duas Serras: what is at stake

Public consultation | Duas Serras Wind Farm | PDA287 | 27 November 2026

To the Portuguese Environment Agency and other competent authorities: **I oppose EVERY turbine at the proposed locations in both scenarios, together with the associated lines, access roads and installations.** I am not asking merely to relocate one or two turbines. This is where we live, rest, obtain water and sustain our lives. I ask that this layout should not be authorised and that the following objections be included in the scope of the Environmental Impact Study (EIA).

### Voltalia group: debt and losses demand guarantees before disturbing the hills

**€2.62 billion**
gross debt, 30 June 2026

**€128.1m**
group loss, 2025

**€43.3m**
group loss, first half 2026

Consolidated Voltalia group figures, not proven debt of Abelha Mística. The group had €343m cash and positive EBITDA; the 2025 loss includes €103m of exceptional effects. These figures do not establish insolvency, but reinforce the need for committed project finance and enforceable guarantees. [3]

## Cabril was refused: a grid reservation does not approve another site

The same promoter, Abelha Mística, received an **unfavourable environmental decision for the Cabril floating solar project on 2 July 2025**. The assessment identified very significant impacts that could not be mitigated, including landscape, ecology and local uses. Duas Serras invokes the reservation associated with Cabril and a 33 MW (33,000 kW) connection. I request the original/current titles, decisions, operator opinion, validity, bonds and conditions. Legal reconfiguration routes exist; their application here must be shown. Cabril's refusal does not establish bankruptcy or abandoned construction. [1,2,4]

## 1. Homes, sleep, health and local life

Residents' measurements indicate some homes approximately **410, 460, 490 and 500 m** away; these are indicative figures, not certified distances or statutory setbacks. I request every receptor to be identified and house-specific studies of daytime/night-time and cumulative noise, flicker, lighting and rest. Require independent enforcement, limits and effective correction. Opposition covers every turbine, including positions without private measurements. Assess tourism, farming, animals, tranquillity and property without assuming percentage losses. [1]

## 2. Groundwater, springs and water supply

Excavation, foundations, trenches, compaction and spills may alter fractures, recharge, flow and quality. The PDA identifies **AG15/AG16 and other works in recharge areas**. I request separate inventories of the Ágria Grande mine/fountains, wells, springs and public abstractions, including Ribeira de Alge; field hydrogeology and seasonal baseline data. Demonstrate non-deterioration and any applicable exemption. Set alert/stop thresholds, responsibilities and immediately funded alternative supply. This does not assert that damage has already occurred. [1,5]

## 3. Erosion, floods and slope stability

The PDA itself identifies erosion, recharge, watercourse and corridor constraints. Local REN mapping distinguishes **headwater areas from flood zones** above Ágria Grande. I request effective maps overlaid on all works and catchment/slope studies of drainage, sediment and stability of cuts, fills and stockpiles. Test intense rain, future climate, burned soils and downstream effects at Ágria Grande, Ágria Pequena, Vale do Vicente and Aldeia Fundeira, following the actual catchments. [1,5]

## 4. Bats, birds, trees and Natura 2000

I request searches for roosts and breeding/resting sites, seasonal bat recording at relevant heights, and justification of the proposed one-night sample per monthly campaign. Study breeding, migrating and nocturnal birds, rotor/cable collision, electrocution, disturbance, tree removal and habitat fragmentation. **Eucalyptus woodland can also have ecological value.** Being outside the Serra da Lousã and Sicó/Alvaiázere SACs does not exclude external/cumulative effects or species protection. Require appropriate assessment where necessary and verifiable measures agreed with ICNF. [1,5]

## 5. Wildfire, detection, evacuation and rescue

The memory of 2017 and areas burned in 2025 require testing ignition within the project and external fire, electrical faults, lightning, oils and maintenance. Verify the lookout, visibility, radio, aircraft, obstacles, water points and simultaneous evacuation/rescue access, including a blocked route. I request operational GNR/ANEPC/civil protection opinions, funded fuel management and effective planning instruments. New roads do not by themselves establish improved firefighting; no universal aviation prohibition is asserted. [1,5]

**Works and access.** Scenario 2: about 53,000 m² of platforms, 6.4 km of trenches and 12.845 km of overhead lines. Require earthworks, dust, transport, heritage, waste, everyday/emergency access and road-repair assessments. [1]

# Our villages, water and memory must not be left with the bill

## 6. Memorial and places of worship: protect memory and landscape



**€1.8m authorised to honour the victims of 2017.** The reported contract award was €1,794,761.91: do not add these figures or treat them as certified final expenditure. A private measurement suggests about 486 m from AG18 to a memorial access point; verification is required. Protect Santo António and São Silvestre too. I request verifiable simulations of all turbines, noise, flicker, light, access and consultation with families/users. [1,6]

Resident-supplied image: Google Street View base (July 2025), with a turbine added. This is an illustrative mock-up; scale, height and visibility have not been validated.

## 7. Finance, capability and abandonment risk

I request the promoter's accounts and technical capability, committed finance and stress tests for delays, overruns, lower production and noise/wildlife shutdowns. The Voltalia brand is not an automatic parent-company guarantee. Before disturbing land, identify who funds stabilisation, water, roads, removal and restoration if works stop or remain incomplete. Require independent cost estimates and legally available, updated, enforceable guarantees that remain effective through insolvency and project sale. [3,4]

## 8. Insurance, liability and project transfer

Distinguish grid bonds, environmental security, liability insurance and restoration. Verify construction-stage cover: fire, pollution, water, neighbours, exclusions, limits and renewals. APA should identify which activities require compulsory environmental guarantees. Transfer, change of control or closure must preserve obligations and cover; the State and residents should not inherit the bill. Environmental liability and private compensation have different legal regimes. [4,5]

## 9. Brazil, landowner information and contracts

There is a Brazilian lawsuit described concerning turbines near homes, impacts and contracts, and a separate OECD National Contact Point complaint. **These are allegations and claims, not verified judgments**; the company contested the lawsuit according to the available summary. I request current explanations and prevention commitments. Locally, distinguish georeferencing consent, lease, occupation and easement; provide signatories with copies and investigate information/consent complaints without presuming fraud. The lawsuit summary consulted is a secondary source. [7]

## 10. Public money and real local benefit

Disclose grants, loans, tax benefits, energy remuneration and benefits promised; permanent/temporary jobs, rents, municipal revenue and public water, road and rescue costs. Public support for another Voltalia project does not prove recovery-fund support for Duas Serras or misuse. Promised revenue does not replace evidence of environmental and planning compatibility. I request accessible agreements and records, respecting lawful confidentiality. [1,4]

## 11. Life cycle and meaningful alternatives

I request a **whole-project LCA**: steel, concrete and blades, manufacture/transport, earthworks, forest/soil carbon, net production, grid curtailment, operating restrictions, maintenance and end of life. Distinguish recyclability from actual recycling, identify blade destinations and what remains buried. Compare alternative sites/routes and no development using equivalent criteria, including cumulative effects, uncertainty, independent review and funded restoration. Climate benefit does not establish this site's suitability. [1,5]

## 12. The council has a voice at this stage

PDA sets study scope; **it is not construction permission**. I request a reasoned adverse municipal position during consultation, distinct from refusing a licence not yet before it. The council may defend local diffuse interests (CPA, Article 68); it has no general veto. Require a works-specific PDM/REN/RAN matrix, assessment under PDM Articles 86-87, competent opinions and identification of the applicable law, including Decree-Law 130/2026 transitional rules. Elected members must act in the public interest, lawfully and impartially. [4,5]

## What I ask to be formally recorded in the procedure

**APA/ARH:** include all these matters in the EIA scope and require verifiable data and effective consultation. **DGEG:** clarify Cabril/grid, titles, capability, land, insurance and guarantees. **Council/CCDR/ICNF:** reasoned positions on residents, planning, REN, species and safety. I request access to maps, versions, opinions, minutes and existing promoter-contact records, responses by topic and publication of reasons. My opposition covers the whole project: removing one turbine does not resolve the others. Absence of final studies at PDA stage does not itself establish illegality. [1,4,5]

**Submission:** Participa, consultation PDA287, announced deadline **14 December 2026**. Read, adopt only what you endorse, identify yourself through your account and attach this PDF; you may add truthful personal observations. Keep the receipt. Check for any published deadline change. [8]

Name: _____ Locality: _____ Date: _____

**Sources and consultation | numbers refer to clickable links**

[1] APA: PDA287, project and methods
[2] APA: Cabril AIA3753, DIA 02/07/2025; assessment, conclusion pp. 79-85
[3] Voltalia: 2025; first half 2026
[4] DL 15/2022; DL 130/2026, art. 9.º
participa.pt/pt/consulta/parque-eolico-duas-serras-pda287
[5] RJAIA, art. 12.º; CPA, art. 68.º; PDM 86.º-87.º; REN; Habitats; Water
[6] Portaria 760/2020; IP, first-half 2023 accounts
[7] PCN Brasil; JUMA, secondary summary
[8] Municipal consultation notice; Participa PDA287