DUAS SERRAS | OUR COMMUNITY MUST BE PROTECTED

These hills are our home

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

The same company behind Cabril is trying to advance another project. After an unfavourable environmental decision for Cabril floating solar, Abelha Mística is now proposing Duas Serras beside our villages. Our homes, the water we depend on, woodland and places woven into our lives are at stake. That is why this layout deserves firm opposition. [1,2]

We created a place to remember the victims. Now a turbine is proposed nearby.



€1.8 million of public money was authorised to create the memorial and its access, where families and visitors can pay their respects to the victims of the 2017 fires. It was designed for remembrance and quiet reflection. The project now places AG18 nearby: an indicative measurement puts it about 486 m from an access point. **A large machine in these surroundings could profoundly change the experience of people coming to remember their dead.** The public purpose of this place deserves protection. [1,6,9]

Resident-supplied illustrative montage on Google Street View (July 2025). The turbine was added; scale, height and visibility have not been validated.

Above Vale do Vicente, residents describe the place of worship of **Santo António and São Silvestre** as part of family prayer traditions carried across generations. AG17 is indicated about **125 m** away. For those families, a turbine so close could change the quiet, the landscape and the continuity of a tradition. These uses must carry weight in the decision. [9]

We remember 2017. Fire returned here in 2025.

The project crosses an area with high and very high wildfire-hazard zones. Land near Vale do Vicente burned in August 2025. Indicative measurements place AG18 about **18 m** and AG17 **126 m** from that fire perimeter. All platforms, roads and lines must also be overlaid on the burned area. Anyone who has lived through a fire knows what smoke, a blocked road or rescue unable to reach them can mean. Before proceeding, electrical faults, ignition, external fire, the lookout, aircraft, water points and simultaneous evacuation/rescue access must be assessed. New tracks alone do not establish greater safety. [1,9]

The water we use cannot be left dependent on a promise.

If a spring loses flow or a well is contaminated, a family loses its water. The PDA itself places **AG15/AG16 and other works in recharge areas**. Excavation, concrete, trenches and compaction can alter water movement or introduce pollution. We require field studies and seasonal measurements of springs, wells, the mine/fountains and public abstractions, including Ribeira de Alge. And someone with secured funds to supply water and repair damage if caused. On slopes, intense rain and burned soil can carry water, earth and sediment downhill: drainage, erosion, floods and stability need catchment-based studies, effective REN maps and works overlays. [1,5,9]

People still have to live here when construction is over.

Local measurements put some homes about **410, 460, 490 and 500 m** from particular positions. What matters is noise reaching a bedroom at night, blade shadows, light and years of undisturbed rest. Distance alone cannot answer that. Every home and the combined effect of every machine must be studied, with enforcement and effective correction. Tourism, farming, animals, paths and heritage are part of local life too. Scenario 2 estimates include 53,000 m² of platforms, 6.4 km of trenches and 12.845 km of overhead lines, plus access roads. These works involve earth, dust, transport and waste requiring assessment and funded repairs. [1,9]

Wildlife does not disappear because there are eucalyptus trees.

Residents report bats regularly. Trees, cavities, water and ridges can provide shelter, feeding grounds and flight routes. Rotors and lines can kill wildlife; clearance and construction can destroy or divide habitats. We require roost searches, seasonal bat surveys at relevant heights, and breeding, migrating and nocturnal bird studies, including collision and electrocution. Being outside Natura 2000 does not remove effects on nearby protected sites or species protection. Measures and any shutdowns must work in practice, with ICNF, before relying on them. [1,5]

An entire hillside cannot be entrusted to promises alone

Voltalia group reports billions in debt and further losses

€2.62 billion
gross debt at 30 June 2026

€128.1 million
group loss in 2025

€43.3 million
loss in the first half of 2026

These are consolidated Voltalia group figures, not proven debt of project promoter Abelha Mística. The group had €343m cash and positive EBITDA; €103m of the 2025 loss reflects exceptional effects. These figures do not establish insolvency; they show why a multinational's promise is insufficient. Full years and half years are different periods. [3]

If this were work on our own home, we would ask for guarantees that it would be finished. Here, whole villages are at stake. Who ensures funding to complete, maintain and restore everything if the project runs into difficulty? Who stabilises an excavated slope or brings water to a family? Trust in the company name does not pay those bills.

In Brazil, families' concerns have already reached court.

Rural-worker representatives and other bodies sued **Voltalia Energia do Brasil and Voltalia S/A** over alleged wind-farm impacts in Serra do Mel. Their requests include moving turbines away from homes, medical/psychological support and contract revision. The company contests the case; the university summary consulted lists it as pending, with no judgment verified here. A separate OECD National Contact Point complaint is officially ongoing. We deserve explanations and concrete prevention commitments before facing similar problems. [7]

It is the same promoter that received the refusal at Cabril.

Abelha Mística, Unipessoal, Lda. appears in both APA files. Cabril received an unfavourable environmental decision on **2 July 2025** because of very significant impacts that could not be mitigated, including landscape, ecology and local uses. Duas Serras now invokes the reservation associated with Cabril and a **33 MW, or 33,000 kW**, connection. DGEG must disclose the titles, decisions, validity, operator opinion, bonds and reconfiguration conditions. Legal mechanisms exist; their application here must be demonstrated. A grid reservation does not environmentally approve these hills. [1,2,4]

If work stops, the community must not inherit the bill.

Before disturbing land, we require evidence of technical capability and finance, delay/overrun tests, insurance and enforceable guarantees for incomplete works, water, roads, waste, dismantling and restoration. Everything needs an accountable party, independent cost estimate and funding protected through insolvency, sale or changes of control. Cover and environmental obligations must be checked for the actual activities. Anyone signing a land document must receive a copy and understand whether it concerns georeferencing, a lease or an easement; complaints must be investigated. [4,5]

Promises on paper do not protect a village.

We need to know which jobs remain, what revenue reaches the municipality, what public support exists and who funds water, roads, rescue and enforcement. Support for another project does not establish recovery-fund support for Duas Serras or misuse. Life-cycle assessment must cover the whole park: manufacture, steel, concrete, blades, transport, forest/soil, net production, restrictions, maintenance, actual recycling and final restoration. It must compare other sites, routes and no development, including cumulative effects. Climate benefit does not make every location suitable. [1,4,5]

The council must defend the people living here. This stage matters too.

The current consultation sets the EIA scope; it is not construction permission. The council can submit reasoned opposition to the locations and defend local interests, although it has no general project veto. We require compliance with PDM, REN/RAN, water, species and the applicable law, including transitional rules; APA/ARH, DGEG, CCDR, ICNF and civil protection opinions; access to maps, minutes and existing promoter-contact records and responses to objections. Revenue and compensation do not justify a legally incompatible layout. [4,5]

By adopting this submission, I oppose EVERY turbine at the proposed locations in both scenarios, together with the lines and associated works. Removing one turbine must not become a way of approving all the others. I request effective protection for residents and consideration of these grounds in PDA287.

Participate by 14 December 2026, the announced deadline: read and adopt only what you endorse, attach this PDF to the PDA287 Participa consultation and keep the receipt. You may add truthful personal observations. Check for deadline changes. [8]

Name: _____ Locality: _____ Date: _____

[9] Participant measurements are indicative, not certified surveys or statutory setbacks. ICNF: fire 20251090518, Vale do Vicente, 15 August 2025, about 27.3 ha. Headwaters are not flood zones. Worship traditions: local accounts. Memorial: €1.8m authorised; reported contract award €1,794,761.91, with no certified final paid account.

[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
[9] ICNF: 2025 burned area; local measurements/accounts
[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; IP: memorial
[7] PCN Brasil; JUMA, secondary summary
[8] Municipal consultation notice; Participa PDA287

participa.pt/pt/consulta/parque-eolico-duas-serras-pda287