

## Open letter: For the Preservation of the Natural Heritage of the Tróia Peninsula

The **Movement for the Free Dunes (Dunas Livres)** wrote this letter to express the concerns, priorities and informed opinions of a citizen group interested in the study and preservation of the landscapes and ecosystems present in the Portuguese shoreline, namely between Tróia and Sines.

The Tróia-Sines coastline is one of the last and most well-preserved areas of the Iberian shore, a unique natural treasure that has, until now, escaped the pressures that are placed on the seaside<sup>1</sup>. However, the territorial classification does not follow, or safeguard, its unique Natural Heritage. The urbanisation scheduled for the Operational Units of Planning (UNOP – Unidades Operativas de Planeamento) 4, 7 and 8 (**Annex I**) are an upfront, assumed and irreversible threat to irreplaceable Natural Heritage.

The Tróia Peninsula, where these UNOP 4, 7 and 8 are found, is a particularly sensitive estuary formation, with dune and wetland ecosystems that are fundamental from ecological and environmental points of view. Nowadays, we would hope that we would be discussing the expansion of the Natura 2020 network to areas of high ecological interest, and not facilitating its destruction through building licenses.

The biggest threat to the ecological integrity of the region is the eminent touristic, real estate development of luxury urbanisation scheduled for the UNOP mentioned above. In general, there is a plan for the building of hotels, villages of touristic houses and apartments, as well as other recreational infrastructures or of logistic support. We bring to mind that the Evaluations of Environmental Impact of these projects showed conditioned assessments<sup>2,3</sup>, and whose requests are often considered non-applicable<sup>2</sup>; furthermore, the Evaluations for the projects of UNOP 4 was published over a decade ago<sup>3</sup>, which is not acceptable.

Discriminately, the Tróia Eco-Resort planned for UNOP 4 is located in the lagoon known as the Tróia Caldera: a wetland particularly relevant for the species protected by the Birds Directive of the Natura 2020 network<sup>4</sup>. The Touristic Set “Na praia” (“*In the Beach*”) in UNOP 7 and 8 will be in dune land adjacent to the Botanical Reserve of the Dunes of Tróia, with which they share ecological characteristics and whose conservation state is excellent, lacking an appropriate evaluation with up-to-date data.

This letter shows our surprise and resentment for the absence of these territorial units from the original demarcation of the Natural Reserve of the Sado Estuary, given their ecological characteristics. Objectively, their inclusion seems essential and logical to the success of the conservation goals that led to the classification of the protected area.

Unregulated urbanisation is a mistake already repeated too many times throughout the Portuguese shoreline, and it is unacceptable to do it again. It is especially shocking since it is 2020, and before international treaties and compromises such as the 2030 Agenda<sup>5</sup>, the Paris Agreement<sup>6</sup>, the Convention on Biological Diversity<sup>7</sup> and the new United Nations Decade on Ecosystem Restoration (2021-2030)<sup>8</sup>.

This Movement is for Dunes Free of unsustainable building; it is for the investment in a truly valuable future for local and coming generations; it is for the respect for citizen participation in the structuring decisions in Portugal; it is for the defence of a heritage of incalculable value to the World.

The defence of the unique and irreplaceable natural heritage of the Tróia Peninsula is of everyone’s responsibility. For all that is mentioned in this letter, we request that this whole area be included in the Natural Reserve of the Sado Estuary, so that it obtains the conservation status and the protection that it deserves.

**ANNEX I – Map of some of the touristic projects, planned or executed, from the Tróia Península to Melides.**





Figure 1 – Dunes of the UNOP 8 of the Urbanistic Plano of Tróia.  
Photo from June 21, 2020.

## **ANNEX II – The Natural Heritage of UNOP 4, 7 and 8, and its most recent threats**

All the Tróia Peninsula is an enormous geomorphically dynamic dune. By mediating the border with the Atlantic Ocean, it creates and shelters the Sado Estuary bay, where emblematic flora and fauna inhabit, of which the common-bottlenose-dolphin is the most famous example, or the sea grass prairies, which are getting recognition worldwide. Unfortunately, its integrity might have been recently affected in December of 2019, by the dredging of the port of Setúbal<sup>9,10</sup>.

The well-developed dunes, which elongate beyond the shoreline, have a fundamental role in protecting against coastal erosion<sup>11,12</sup>. This role is especially important in this region, due to the threat of the rising sea level and the intrusion of the saline wedge in the Sado Estuary bay<sup>1</sup>.

The dunes of Tróia are home to several endemic and rare species, including some protected at a European level by the Habitats Directive of the Natura 2000 network, and many are threatened. It is easy to recognise the presence of these habitats, protected by European Directive<sup>13</sup>(**Annex IV, Figure 1**), both dunes and wetlands, and an unusual plant richness in excellent conservation status. We found this exuberant biodiversity most abundant (unfortunately) in lands of the peninsula on which there are plans for urbanisation.

**Let's not forget also the importance of the maintenance of this dynamic sand formation, covered in vegetation, to the recharge of the Tejo-Sado aquifer, essential to the local and regional populations and economies<sup>14</sup>. The negligence of the importance of healthy water resources and prudent usage, above all in sandy and arid regions, is particularly scandalous and expensive to the Portuguese people, which suffers from recurring droughts. Their preservation is, thus, of public interest, which adds more weight to the conservation of this aquifer, especially considering the already advanced urbanisation status of the area.**

## **ANNEX III – The mission of the Movement for Free Dunes (Dunas Livres)**

We believe in the intrinsic and functional value of this remarkable natural heritage, as well as the importance of its protection and improvement of its conservation status through adequate management. We exercise the right to manifest our dissatisfaction in regard to the decisions of territorial planning and management of this region. We thereby hold that it is our duty, as citizens, to actively participate and demand the protection of these ecosystems due to the services of incalculable value that they provide, for us and for future generations.

Because we believe that Nature conservation is only compatible with sustainable economic and social incentives, benefiting local communities and never existing separate from these, we suggest a review of this region's development strategy. We defend that the beaches and the surrounding nature must be accessible to all, so that they can be enjoyed in a sustainable way.

We request the full protection of the natural and communal values mentioned in this letter, in face of external pressures that may compromise their integrity, particularly in the coastline.

ANNEX IV – Table of target-habitats of the Habitat Directive, Natura 2020 network<sup>9</sup>, seen at UNOP 4, 7 and 8 of the Tróia Peninsular.

<i>Type</i>	<i>Code</i>	<i>Habitat</i>
<i>Dune</i>	1210	Annual vegetation of the zones of detritus accumulation by the tide
	2110	Embryonic mobile dunes
	2120	Mobile coastal dunes with <i>Ammophila arenaria</i> ("white dunes")
	2130pt1	Fixed dunes with herbaceous vegetation ("grey dunes")
	2150pt1	Atlantic decalcified fixed dunes ( <i>Calluno Ulicetea</i> )
	2190pt1 e pt2	Wet interdune depressions
	2230pt1 e pt2	Dunes with <i>Malcolmietalia</i> meadows
	2250pt1 e pt2	Coastal dunes with <i>Juniperus</i> spp.
	2260	Dunes with sclerophyllic vegetation of <i>Cisto-Lavenduletalia</i>
	2270	Dunes with <i>Pinus pinea</i> or <i>Pinus pinaster</i> forests
	2330	Interior dunes with open meadows of <i>Corynephorus</i> e <i>Agrostis</i>
<i>Wetland</i>	3110	Oligotrophic waters of sand planes, with little mineralization ( <i>Littorelletalia uniflorae</i> )
	3160	Natural dystrophic lakes and ponds
	6420	Wet Mediterranean meadows of high <i>Molinio-Holoschoenion</i> vegetation
	7140pt3	Transition peat bogs and undulating peat bogs

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