



MANIFIESTO ON DOÑANA'S WATER

Save Doñana Platform

Doñana is one of the most important and unique wetlands in Europe. Its listing as a World Heritage Site along with recognition granted by various international organizations make this territory a unique and natural treasure.

It is a fundamental part of our history and reminds us that we must coexist alongside the nature that surrounds us, respecting biodiversity. The reserve shelters diverse wildlife and is a symbol of our collective identity, therefore we have the obligation to preserve it in all its singularity, just as we do with other world heritage sites such as the Alhambra, the Camino de Santiago, or El Escorial.

Its size, 128,000 hectares, its extraordinary value, and its multiple forms of protection do not exempt it from risks and threats that increase its vulnerability and compromise its survival.

Today, Doñana is once again seriously threatened by the possibility that the Andalusian Government may modify the legislation that regulates agricultural uses through a fast-track process, without transparency or public participation, by granting amnesty to all the illegal irrigation areas that have been created and which are stealing water over the last few decades.

In addition, together with other measures, it includes an amendment to the Andalusian Forestry Law to encourage farmers with low agricultural profitability who converted their land to forestry in the past to revert back to irrigated agriculture, cutting down trees to be able to plant when there is water.

The proposed law is a compendium of modifications to the current regulations that seeks to amnesty illegality and consolidate an increase in intensive irrigated agriculture without limits, dismantling what was established in the Territorial Planning Plan of the Doñana Area, which was developed in the plan agreed upon by all the interested parties in 2014 called the Forest Crown Plan, which constituted a milestone of consensus by establishing a framework of planning that gave legal security and viability to legal agriculture in the surroundings of Doñana National Park.

We cannot allow the European funds that have already been invested for many years in the conservation and sustainable development of Doñana to be wasted, nor can we accept the unfair treatment of legal farmers who would be tremendously affected by these regulatory changes. It is also unacceptable to maintain an economic model that is incompatible with the conservation of our natural heritage and identity, simply to favor agricultural activities that do not comply with the law.

The proposed law is a compilation of amendments to the current legislation that aims to grant amnesty to illegal activities and consolidate an increase in intensive irrigation agriculture with no limits, dismantling what was established in the Territorial Management Plan of the Doñana Area, which was developed in the plan agreed by all interested parties in 2014 called the *Plan de la corona forestal* (Forest Crown Plan), which constituted a milestone of consensus by establishing a framework of planning that provided legal certainty and viability for legal agriculture in the vicinity of Doñana National Park.

There are alternatives so that this proposal, supported by the Andalusian Government since February 2023 and which would be devastating for the most important wetland in Europe, doesn't move forward, but political will is needed.

Therefore, since April 2023, the Save Doñana Platform has come together to stop this absurdity, and we invite you to join us, as a citizens' movement, in rejecting the Government and Andalusia's continued support and promotion of the Proposed Law presented by the PP and VOX parliamentary groups. This law was admitted by the Standing Committee of the Andalusian Parliament and sent to the Council of Government, with the intention of being approved by the Andalusian Parliament through an expedited procedure to shorten deadlines, avoid transparency, and bypass the mandatory public information process.

We ask that you join us and unite our efforts to prevent the legalization of all agricultural operations that extract water illegally and promote deforestation of land in Doñana. It is urgent that the proposed law be permanently withdrawn and that the Special Plan for the management of irrigation areas located north of Doñana's forest crown be strictly enforced. We need to urge our institutions and representatives to defend this natural treasure for present and future generations, supporting legal economic activity that is compatible with the preservation of its exceptional worth.

This is especially important considering the extremely serious situation in Doñana, as exposed by the Doñana Biological Station of the Spanish National Research Council (CSIC) in the last session of the Participation Council for the Doñana Natural Area on April 10, 2023. In his presentation, the director of this research center outlined the generalized deterioration of the Doñana lagoon system and the loss of biodiversity associated with these habitats, not only due to the expansion of cultivated areas, but

also to the observed changes in temperature and precipitation each year, as well as the persistent drought period, which will intensify in the future due to climate change, clearly impacting a decrease in water availability.

The CSIC report is resoundingly and demonstrates the complete lack of reliability of the arguments and statements put forward in the proposed Law. In fact, the report emphasizes that "*the lack of implementation of the Forest Crown Plan (Plan de la Corona Forestal) has led us to the unsustainable critical point in which Doñana currently finds itself*" and that the truly urgent matter is to adjust water demand to availability, because otherwise, in addition to destroying Doñana, legal operations will have problems irrigating, putting the entire economic activity of the region at risk.

This has also been confirmed by the Guadalquivir River Basin Authority, which has reduced the percentage of water released from reservoirs this year compared to the previous irrigation season, with a decrease of 36% compared to last year, due to the extremely severe drought that Andalusia is experiencing, with precipitation 35% below average and five years of releasing more water than is collected.

The administrations have the obligation to protect our heritage and citizens have the responsibility to defend it, therefore the signing persons and organizations:

- Demand that the parliamentary groups of the PP and VOX parties withdraw their proposed law (12-23/PPL-000001) titled "For the improvement of the organization of the Condado de Huelva agricultural areas, in the municipalities of Almonte, Bonares, Lucena del Puerto, Moguer and Rociana del Condado (Huelva)."
- Demand that the Regional Government of Andalusia strictly comply with the Special Plan for the Management of Irrigation Zones located to the north of the Doñana forest crown, also known as the "*Plan de la Fresa*" (*Strawberry Plan*) and "*Plan de la Corona Forestal*" (*Forest Crown Plan*), and reject any modification of it, as it was approved with criteria of social and scientific consensus and responds to a higher norm. Likewise, it should establish a permanent groundwater management based on the same criteria as crops irrigated with surface water in the converted Seville province marsh, always adjusting to the water availability in the aquifer depending on the actual replenishment and its conservation status.
- Demand that the Regional Government of Andalusia neither promote nor reward deforestation in Doñana, as it would endanger the entry of legal products produced in the

Doñana environment into the European market, obtained in accordance with European regulations, which promote sustainable consumption and seek to ensure that only legal and deforestation-free products are consumed in Europe.

- Demand that the Spanish Government promote and encourage due diligence processes in environmental and human rights matters so that agricultural companies comply with their obligations to respect, protect and promote human rights and guarantee the effective reparation of human rights violations and environmental damage that may be committed, where appropriate, as a result of the activities carried out by such companies in their supply chains, safeguarding legal companies that carry out their processes within the established legal framework.
- We demand that the Central Government comply with the European Court of Justice Ruling regarding Doñana, which ruled in June 2021 that the Kingdom of Spain is breaching Community law, particularly the Water Framework Directive and the Habitats Directive. Therefore, it must guarantee compliance with said Directives, as well as current state regulations while carrying out exhaustive control, surveillance, and sanctioning of those who plunder water in Doñana, as well as the definitive closure of all illegal wells in the Doñana Region as soon as possible, for which it must increase the number of agents dedicated to this work and, preventively, guarantee their physical safety in being able to carry out their duties.
- Demand that the Spanish Government promote the sustainable and responsible development of the Doñana Region and ratify the Paris climate agreements to defend the well-being and quality of life of citizens. To this end, we urge the Spanish Government to undertake a plan to restore the water systems of Doñana, and its degraded ecosystems (forests, marshes, Guadiamar river, Guadalquivir estuary), incorporating the recovery of Doñana's tributary surface waters into the Guadalquivir Hydrographic Planning, which currently ignores its management, and therefore assumes the numerous allegations submitted during the public information period of the third cycle, regarding Doñana's surface waters.
- Demand that the Spanish Government analyze and assess the quality of the surface water intended for irrigation of crops within the scope of the proposed law, replacing the groundwater in the aquifer before authorizing its use, given that part of it comes from the so-

called Alcolea dam, located in a region historically contaminated by mining activity and its use could be harmful to human health and the ecosystems of Doñana.

- Demand that the Central and Andalusian Administrations promote appropriate policies to develop sustainable and socially equitable agriculture in the region, which is inherent to any sustainability approach. This includes measures for the sector's restructuring and the promotion of other necessary sectors, incorporating the criteria for a just ecological transition required by the context of climate change. It should be done in a way that these inevitable changes do not disproportionately harm the most vulnerable sectors of the population in this territory already marked by great social inequalities, where not all individuals have the same level of responsibility for the damages caused.
- Demand that the Spanish Government, in the event that the Proposed Law for the improvement of the organization of the agricultural zones of the Condado de Huelva prospers, adopt urgent measures and appeal it before the Constitutional Court as well as before the European Justice, preventing not only the irreversible environmental damage that it will generate in the area but also the million-euro fines that the European Union will impose on the Spanish citizenry as a whole.
- We commit to informing citizens and institutions about Doñana's importance and richness so that together we ensure its conservation and never again put our natural heritage at risk.
- We commit to dialogue and to working with all local economic, social, and any other collectives in the Doñana region, to make Doñana a global example that combines natural wealth, quality of life, and sustainable and fair development.

It is time, once again, to **Save Doñana**.