

Dear Xunta de Galicia,
Dear Madam Conselleira of Economy and Industry,
Dear Madam Conselleira of Environment and Climate Change,

Dear Government of Spain,
Dear Mr. Minister of Industry and Tourism,
Dear Madam Minister for the Ecological Transition and the Demographic Challenge,

We, 52 Environmental Non-Governmental Organisations, are writing to you to **vehemently oppose the planned project for a new cellulose pulp and eucalyptus fibre factory in Palas de Rei (Lugo, Galicia, Spain) by Altri, a Portuguese pulp and paper manufacturer.** It is paramount that this project does not go ahead if the Spanish government and the Xunta de Galicia are seriously committed to restoring nature and biodiversity, effectively tackling the climate crisis and carrying out the ecological transition.

This project has awakened rare and massive **social opposition in the region, supported by many neighbourhood organisations, environmentalists, producers and a good part of the academic sector.** Once we have consulted the documentation concerning this procedure, **we must strongly advise against its implementation and request that the project be discarded.** We consider that otherwise, the natural environment in which the factory is to be located, the biodiversity of highly valuable natural areas, many of them protected or in need of protection, vulnerable and endangered species, the cultural heritage of the region of A Ulloa, the local primary sectors, the water resources linked to the entire Ulla basin and even the health of people in a wide radius of action may be seriously affected.

The **territory of Galicia, together with Central and Northern Portugal,** has lived a worrisome development, absolutely unusual in Europe due to its **enormous area of eucalyptus monocultures, which exceeds 1.3 million hectares.** Expansion of these plantations has been heavily promoted in the last decades. There are reasonable doubts that the existing moratoriums for new plantations (Galicia until 2025 and Portugal until 2030) are being breached in some cases and are failing to limit its expansion. These monocultures have been promoted mainly by the pulp industry and have generated, according to **many scientific**

studies¹²³⁴⁵, **an enormous loss of biodiversity** and a significant **deterioration of the region's ecological integrity, radically affecting native forests** and many other habitats of high conservation value. Companies such as Ence, Altri and Navigator exert an unusual pressure on Atlantic ecosystems and drive a low-value timber cycle that does not help the sustainability of economic development.

The planned pulp and fibre factory is projected to produce **250,000 tons/year of cellulose and 60,000 tons/year of lyocell in Phase I** and **400,000 tons/year of cellulose and 200,000 tons/year of lyocell in Phase II**, adding extraordinary pressure on local agriculture and forest landscapes to supply its needs in wood. In further detail, the project presents several problems that make it unsustainable and irresponsible:

- It **violates a previously approved expansion of the Natura 2000 Network** (ZEC Serra do Careón, ZEC Sistema fluvial Ulla-Deza and others) and its expansion projects⁶ approved by the Xunta de Galicia in 2008 and 2012, creating a direct trade-off between pulp production and nature protection and restoration;
- It **demands an unsustainable increase of wood consumption for Galician land**, estimated to be 1.2 million m³ of eucalyptus (during phase I of the project). Galicia already produces 70-90% of Spain's eucalyptus volume, with over 400,000 hectares of eucalyptus. Opening a new monoculture plantation cycle could reach 190,000 hectares⁷.
- **The expansion of eucalyptus monocultures will negatively affect local and regional wildlife and biodiversity.** The eucalyptus is a highly flammable, highly water-thirsty tree that **drains the soil, increases the risk of large wildfires** and prevents any wildlife from flourishing, directly countering the much-needed efforts to increase biodiversity.
- The factory will **require excessive water consumption**, with a catch request of 46,000 m³/day from the Ulla River, without any assessment of the future effects of climate change⁸.

¹<https://noticias.uc.pt/artigos/estudo-internacional-revela-que-eucaliptos-provocam-dramatica-reducao-da-biodiversidade-do-territorio/>

²<https://praza.gal/ciencia-e-tecnoloxia/un-estudo-publicado-na-revista-nature-reflicte-a-baixa-calidade-das-masas-forestais-en-galicia>

³<https://www.nature.com/articles/s41467-020-19493-3>

⁴<https://archivo-es.greenpeace.org/espana/es/reports/Un-vision-comun-sobre-el-problema-de-las-plantaciones-de-eucalipto/>

⁵<https://archivo-es.greenpeace.org/espana/Global/espana/report/bosques/InformeEucalipto2011.pdf>

⁶https://medioambiente.xunta.gal/seccion-organizacion/c/CMAOT_DX_Conservacion_Natureza?content=Direccion_Xe_ral_Conservacion_Natureza/Espazos_protexidos/seccion.html&sub=Rede_natura_2000/

⁷<https://consellodacultura.gal/publicacion.php?id=4515>

⁸Critical review and analysis, by Professor Horacio Garcia, p. 57 <https://consellodacultura.gal/publicacion.php?id=4515>

- It will create a **discharge of treated wastewater of 30,000 m³/day into the Ulla River**, above the catchment area, with the consequent impact on the entire basin and probably on the Arousa estuary and its productive sectors.
- It **directly impacts endangered endemic species** (3 of them strictly endemic, *Santolina melidensis*, *Armeria merinoi* and *Leucanthemum gallaecicum*). Within the scope of the project, **more than 140 bird species have been recorded**, of which four are included in the Galician Catalogue of Endangered Species and six in the Spanish Catalogue of Threatened Species. In addition, **other endangered species would be affected in the Ulla River**.
- It **jeopardises the livelihoods of the local population** due to the existing agroecological development projects and initiatives in the region.
- It **requires €250 million of public European funds of [Next Generation EU](#) when one of its goals is to “improve water quality in our rivers and seas and reduce waste”**, while the project will further worsen the water quality of the Ulla River. In addition, it completely **goes against the [Green New Deal](#)**, namely the **[EU’s biodiversity strategy for 2030](#)** that “contains specific commitments and actions, [such as] enlarging the existing Natura 2000 areas, the EU-wide network of protected land and sea areas; launching an EU nature restoration plan; [...] unlocking funding for biodiversity, to enable the necessary transformative change;”, all of which this project astonishingly contradicts. Therefore, **this investment cannot be considered environmentally sustainable, as it is in clear contradiction with all relevant European and national policies investments**.

Therefore, we must consider that this project has no conditions to go ahead nor to be publicly financed by NextGenerationEU funds and that in this region, there is already an oversaturation of the pulp and paper industry. **Instead, we should move in the opposite direction: reduce the area of eucalyptus as required by the Galician Forestry Plan currently in force**, move towards the **global reduction of paper production** and consumption, promote reusable packaging, **maximise the content of recycled fibre** in paper products, **increase the use of other recovered materials** and put an **end to the use of fibres from endangered forests and forests**, ecosystems and habitats of high conservation value, tending to manufacture new generation fibres and not from wood.

We call on the Xunta de Galicia and the Gobierno Español to urgently and publicly answer this call to stop once and for all the pulp and fibre factory project in Palas de Rei.

Best regards,

The undersigned Non-Governmental Organisations,

AMAF-Bénin - Benin



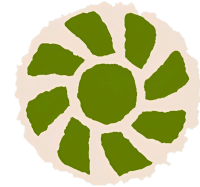
Amigas da Terra - Spain

ARA - Germany



Australian Forests and Climate Alliance (AFCA) - Australia

Biodiversity Conservation Center - Russia



Biofuelwatch - International



Blue Dalian - China

Bob Brown Foundation - Australia



Bruno Manser Fonds - Switzerland

for the peoples of the rainforest

Canopy Planet - USA



Denkhaus Bremen - Germany



Dogwood Alliance - USA

Earthday.org - International



Ecologistas en Acción - Spain

Elfond - Estonian Fund for Nature - Estonia



Environment East Gippsland - Australia



Environmental Paper Network - International



Fern - European Union, Brussels-based



Finance & Trade Watch - Austria



Focus - Slovenia



Forum Ecologie e Papier - Germany



Forum Umwelt und Entwicklung - Germany



Fridays For Future Estonia - Estonia



Friends of the Earth Western Australia - Australia

Global Justice Ecology Project - USA



Green Longjiang - China

Green-ish - Egypt



Greenpeace España - Spain



Humusz Szövetség - Hungary

IRIS - Portugal



Luontoliitto (The Finnish Nature Association) - Finland

MODrzew - Poland



North Coast Environment Council - Australia

Päästame Eesti Metsad (Save The Estonian Forest) - Estonia



NORTH COAST ENVIRONMENT COUNCIL, INC.

Pracownia na rzecz Wszystkich Istot (Association Workshop for All Beings) - Poland

Pro REGENWALD - Germany



Quercus - Portugal

Rainforest Action Network - International



Rettet den Regenwald e.V. - Germany

Robinwood - Germany

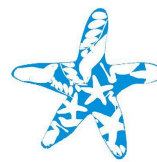


Salva la Selva - Spain



SEO/Birdlife - Spain

Scholar Tree Alliance - China



大连高校环境联盟

Skyddaskogen - Sweden



Snow Alliance - China



South East Region Conservation Alliance (SERCA) - Australia



South-West Forests Defence Foundation - Australia



SOUTH-WEST FORESTS DEFENCE
FOUNDATION INC.

Verdens Skove - Denmark



Victorian Forest Alliance - Australia



WWF España - Spain

ZERO - Portugal



Zero Waste BC - USA

