

## **Preliminary Reflection on the Environmental Report of the National Program for Dams with High Hydric Potential**

### **Abstract**

By request of the Minister for Environment, Spatial Planning and Regional Development, the Council made an advice on the Environmental Report of the National Program for Dams with High Hydric Potential (PNBEPH).

CNADS is aware that, from the beginning, the isolated analysis of the environmental aspects is meaningless, for it would only gain strength through an integrated consideration of the Program's economic, social and environmental assets.

In this perspective, CNADS proceeded with this preliminary analysis and made the following considerations and recommendations:

- To promote the national compatibility of the PNBEPH with the regional and local domains, considering the points of view and doubts shown by some social partners, namely the municipalities, whit territories that will be affected by the new hydro-electric installations. In this matter, it would be convenient to lend greater attention to the predicted recovery in the natural and built patrimonies domain, being that the latter is focused on the technical infrastructure, collective equipments and potentially affected buildings.
- To advise the re-opening of a new and wider consultation and public discussion period for the PNBEPH before issuing the Impact Declaration that will effectively include and integrate the new data for the Plans to be approved, as in the cases of the Energy Efficiency National Plan and the Hydrographic Basins Management Plans, as well as some relevant contributes and points of view already openly expressed by the social partners.
- To underline that, when it comes to energy management, it has been common the vote for the prevalence of the measures related to their demand (energy saving and efficiency) due to reasons essentially related with a lesser cost, economic efficiency and with environmental concerns for the control of pollution emissions and ecosystem degradation. This perspective does not exclude comparing other renewable energy sources and their reasonable technological alternatives, according to the spirit and the letter of the Directive 2001/42/UE and the Decree-Law no. 291/2007, of July 15th.
- To stress the need for coherence between the several goals of the public policies aiming to face the environmental crisis, referring to electricity production from renewable

sources and to nature conservation and biodiversity. In both domains, energy and biodiversity, Portugal has legal obligations and international commitments that can only be respected and fulfilled within the scope of a consistent strategic vision and with a degree of suitable information and knowledge for all the parts included, that is, medium and long-term economic, social and environmental sides.

To stress that no hydro-electric installations - regardless of their public or private management model - can ignore that one of the main criteria of their sustainability lays in the ability to compatibly integrate multiple ends and uses, involving the direct economic services as of the biodiversity, placing an emphasis on avoiding situation that can, in the future, be damaging for the territory.