**AL MINISTERIO PARA LA TRANSICIÓN ECOLÓGICA Y EL RETO DEMOGRÁFICO (MITECO)**

TO THE MINISTRY FOR ECOLOGICAL TRANSITION AND DEMOGRAPHIC CHALLENGE (MITECO)

M / Ms. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ with ID number \_\_\_\_\_\_\_\_\_\_\_ on his/her own behalf, with address for notification purposes at \_\_\_\_\_\_\_\_\_\_\_\_\_, street \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, number \_\_\_\_zip code \_\_\_\_\_\_ and cadastral reference \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. In relation to the announcement of MITECO, on its website, dated February 3rd, 2021, in which a public consultation period of the Plan for the Protection of the Ebro Delta is being started, a document prepared by CEDEX under the direction of the General Directorate of the Coast and the Sea and the General Directorate of Water, I present the following:

ALLEGATIONS

The submitted Plan should be withdrawn as one of the main actions which proposes the creation of a protection strip to allow free movement along the coast. This strip crosses private lands in which these days there are many houses, buildings, economic and social activities and lands with a very high tourist potential. All of them deserve and require protection.

The Plan also chooses to let the sea advance. Something that will definitively cause a great loss of the productive use of the land, which is illegitimate and contrary to authentic policies for adaptation to climate change. The selection of this accommodation proposal is hasty since the Plan does not value other alternatives, admits the lack of precision of the calculations made, and even, despises those affected since it does not even describe the uses condemned to disappear.

The Plan is illegitimate because it seems to encourage the natural degradation of an area of ​​land for its incorporation into the public heritage either through demarcation or through expropriations. Both figures can be firmly answered: it is questionable whether the planned boundaries fit into the current coastal law. As for expropriations, up to date the essential cause of public utility that can legitimize it can only be found conjectures that are not sufficiently verified. After reading the Plan, it is totally noticeable that it has been drawn up by scientists outside this area, who are totally unaware of these facts and do not take into account the property and economic activities of those who live here.

On the other hand, the Plan is contrary to the true policies of adaptation to climate change that must not exclude human activities, but must seek their protection. From this perspective, the Plan is contrary to sustainable development, which as an expression of the guiding principle of social and economic policy enshrined in the article 45 of the Spanish Constitution (rational use of natural resources) is legally binding. The owners of the Delta share the urgency of continuing to adopt measures to protect the environment. However, they cannot consent to the fact that alleged demands for the protection of uncertain results can become the only engine of the action of the public authorities, with contempt for the private property.

For those of us who live here, the sustainability of the Delta is not achieved through a Plan that favors the incorporation of new lands into the public domain, but rather requires actions that allow the protection and adaptation of private homes on urban lands in Riumar, as well as the rest of buildings or lands with tourist potential in the municipality for the effects of climate change. The Plan foresees looting due to natural degradation of the land, accepting the advance of the sea according to long-term predictions. This political option has been raised with serious irresponsibility (the Plan lacks any economic analysis) and it is contrary to the proposals of the scientific community, which prioritize those actions that reduce vulnerability to the impacts of climate change and allow all human activities to be maintained as much as possible.

The precautionary principle cannot consist of anticipating the possible economic damages linked to climate change. And this is the alternative of the Plan when opting, without sufficient reflection, for the anticipated impact and loss of ownership of houses on urban lands or buildings on rustic lands, built with the approval of all administrations. Even in the most pessimistic scenario, adaptation cannot translate into destruction.

We are facing a situation of absolute discrimination, lack of legal security. Moreover, it is regrettable that the Plan is being drafted turning its back to the Taula de Consens del Delta, despite its territorial legitimacy and its insistence on actively participating in the elaboration of the strategy of the Ministry in relation to the Plan. As demonstrated by the Delta Plan drawn up from the territory, there are effective measures to make uses more resilient and protect their vulnerability and the risk to people and their properties.

Due to this, as an owner, I am directly opposed to this Plan and any other that does not respect the present uses of the territory and its inhabitants.

Due to this,

**I REQUEST** that, considering these observations and allegations to the Plan for the Protection of the Ebro Delta, all the allegations above to be taken into account which are: the action consisting of the creation of a protection strip that runs through privately owned urban lands, as well as the rest of buildings and lands with tourist potential, and a new Plan is drawn up which includes actions for the protection of urban lands, private properties and, also, the economic activities that sustain life in the territory, in accordance with the plan and with the Taula de Consens del Delta itself.

Signed.

Deltebre (Delta de l’Ebre), on \_\_\_\_\_ of \_\_\_\_\_\_\_\_\_\_\_, 2021