

10 YEARS OF THE DOÑANA FOREST CROWN SPECIAL PLAN: WWF EVALUATION

INDEX

INTRODUCTION AND BACKGROUND	3
PROGRAMME OF ACTIONS AND COMPLEMENTARY MEASURES	4
WWF'S ASSESSMENT OF COMPLIANCE WITH THE MEASURES Contained in the programme of actions and the special Plan's programme of complementary measures	5
RESULTS	9
CONCLUSIONS	11
WWF REQUESTS	13

10 Years of the Doñana forest crown special plan. WWF evaluation

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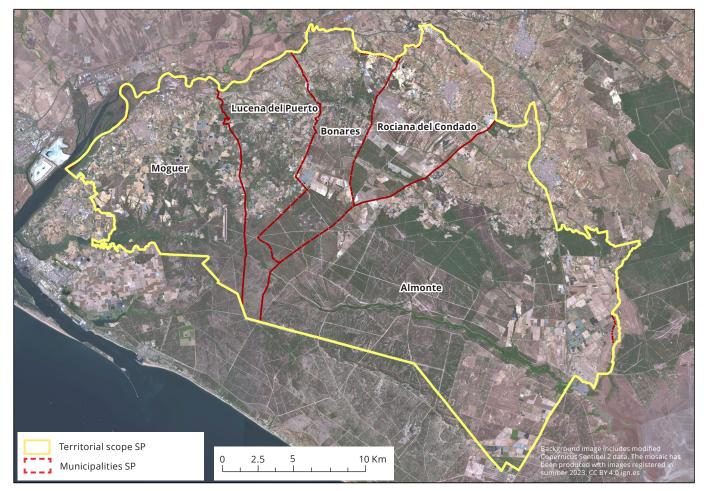
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INTRODUCTION AND BACKGROUND

In recent decades, red berries (strawberries, blueberries, raspberries, and blackberries) grown under plastic have proliferated on the sandy soils around Doñana. In an attempt to resolve the problems of land use planning, the Andalusian Regional Government drew up the Doñana Land-Use Plan (POTAD), which came into force in February 2004. The POTAD commissioned the preparation of a Special Land Management Plan for the irrigated areas located to the north of the Doñana forest crown (hereinafter, Special Plan) in the municipalities of Almonte, Bonares, Lucena del Puerto, Moguer and Rociana del Condado (Huelva), which was officially approved in December 2014 (see Map).

The Special Plan is structured into a series of documents, including report, regulations, programme of action. The Programme of Action details the actions (Programme of Actions, 55 measures) that the competent authorities (Andalusian Regional Government, Guadalquivir River Basin Authority (CHG) or Town Councils) must carry out and the period in which these actions must be implemented (in the short, medium or long term) in order to solve the regional problems detected in the area of the Special Plan. In addition, the Andalusian Regional Government drew up a Programme of Complementary Measures consisting of 34 measures in addition to the actions already described in the Programme of Actions.



Map. Regional scope of the Special Plan and municipalities that are subject to it.

Source: developed in-house using the official cartographic base of the Special Plan).

PROGRAMME OF ACTIONS AND Complementary measures

The Special Plan includes a programme of actions comprising 55 measures with detailed implementation deadlines. It is expressly stated that "The proposed actions must be implemented or be in the process of being implemented within a period of no more than fifteen years" and that the actions described are to be carried out in order of priority, for which reason they are divided into three periods:

Term type Period		
Short term	From December 2014 to December 2019, actions implemented in the first five years from the development of the Special Plan	
Medium term December 2019 to December 2024, actions implemented within five to ten ye		
Long term	December 2024 to December 2029, actions implemented between years eleven and fifteen	

Through these deadlines, the Action Programme establishes the priority for implementing the actions (5, 10 or 15 years). The Programme, therefore, not only details the actions, but also prioritises them. The high priority (short-term) actions should have been implemented by 2019 and the medium-term actions should have been implemented by December 2024, the date of this report.

All the actions proposed in the Action Programme are binding on the different public authorities, bodies and entities, including any foreseeable actions that may be developed through private initiatives. This includes investment proposals by the public authorities that will only materialise with the firm commitment of the private sector.

On the other hand, the Special Plan envisages a series of 34 additional measures that complement the 55 measures already described in the Action Programme of the Special Plan.

WWF'S ASSESSMENT OF COMPLIANCE WITH THE MEASURES CONTAINED IN THE PROGRAMME OF ACTIONS AND THE SPECIAL PLAN'S PROGRAMME OF COMPLEMENTARY MEASURES

Within the framework of the Special Plan Monitoring Commission, the Andalusian Regional Government issues an annual (or biannual) report detailing the actions taken in relation to the Special Plan for the Doñana Forest Crown; this report is subsequently submitted to the Doñana Natural Area Participation Council; this was presented at the end of November 2024.

WWF Spain has evaluated the public information contained in the reports from the monitoring commission, contrasting the information with that contained in the technical reports drawn up by WWF and the complementary fieldwork, to establish whether the measures established for the short and medium term (10 years, December 2014-December 2024) in the Programme of Action (55 measures, see Table 1) in addition to the 34 measures in the Programme of Complementary Measures (Table 2) have been complied with. The measures assessed by WWF correspond only to the measures contemplated in the short and medium term phase, as the long term measures cannot yet be assessed (at the time of writing this report) and will therefore be marked N/A (Not Applicable).

To facilitate the interpretation, WWF will use the following visual method to assess whether or not the measures have been implemented:

Implemented	There is sufficient data to demonstrate that the measure has been fully implemented	
Partially implemented	Although some actions have been implemented, they have not been fully realised	
Not implemented	There is no data or information to demonstrate that action has been taken or progress has been made	
N/A	Not applicable. Not assessed as it is for a subsequent timeframe (medium or long term) that does not correspond to the date of this report	

The measures described in the Special Plan's Programme of Action, the timeframe for their implementation and the public body responsible for that implementation are described in Table 1. Table 2 describes the measures adopted in the Programme of Complementary Measures and their implementation timeframe.

Table 1. Actions described in the Special Plan's Programme of Action and the timeframe for their implementation.

			ACTIONS	DEADLINE	IMPLEMENTATION STATUS	COMPETENT BODY
	Road network	1	Wildlife crossings between roads and ecological corridors	Short-medium-long	N/A	CMAOT/CFV/DP
		2	Upgrading and improvement of main rural routes	Short-medium-long	N/A	ΑΥΤΟ/ΑΡ
		3	Upgrading and improvement of secondary rural routes	Short-medium-long	N/A	ΑΥΤΟ/ΑΡ
		4	Maintenance of main rural routes	Medium-long	N/A	ΑΥΤΟ/ΑΡ
		5	Maintenance of secondary rural routes	Medium-long	N/A	ΑΥΤΟ/ΑΡ
		6	Implementation of a network of agricultural trails	Medium-long	N/A	ΑΥΤΟ/ΑΡ
	Network of rural routes	7	Signposting for the network of main rural routes	Short		ΑΥΤΟ/ΑΡ
		8	Signposting for the network of secondary rural routes	Short		ΑΥΤΟ/ΑΡ
rea		9	Informative signs and installation of wildlife dispersal deterrents along the network of main rural routes	Short-medium		СМАОТ
tural a		10	Informative signs and installation of wildlife dispersal deterrents along the network of secondary rural routes	Short-medium		CMAOT/AYTO/ AP
agricul	Energy network	11	Adaptation and improvement of the electricity supply network to farms	Short-medium		АР
Je a		12	Upgrading of renewable energy supply facilities	Short-medium-long	N/A	AP
of th	Agricultural waste	13	Conditioning of agricultural waste collection points	Short		AYTO/DP
Organisation of the agricultural area		14	Implementation of the recreational area known as Ribera del Río Tinto	Medium		CMAOT/AYTO
rganis	Public use of agricultural and forestry land	15	Adaptation and improvement of existing recreational areas	Long	N/A	CMAOT/AYTO
0		16	Implementation of recreational trail on existing paths	Medium		CMAOT/AYTO
		17	Implementation of recreational trail on new paths	Medium		CMAOT/AYTO
	Modernisation	18	Modernisation of irrigation and farms	Short-medium		CAPDR/CCRR/ MAGRAMA
		19	Research and recovery of public forests	Short		CMAOT/AYTO
	Previous action	20	Updating of the register of fee-paying plots on Municipal Public Forestry Land and other heritage/ publics land	Short		CMAOT/AYTO
		21	Detailed study of the fee-paying plots with agricultural use in Public Forests in Zone B and C, for the relocation and updating if necessary.	Short		СМАОТ
	Consolidation	22	Delineation and partial demarcation of the Public Forests owned by the Andalusian Regional Government in contact with agricultural areas.	Medium-long	N/A	СМАОТ
rea		23	Delineation and demarcation of Municipal Public Forests. Installation of information panels on the Network of Public Forests in the area	Short-medium		CMAOT/AYTO
estry area	of public forest ownership	24	Inclusion of PTAAM public forest land in the Andalusian Forests Catalogue. Delineation and demarcation	Short		СМАОТ
Fore		25	Updating of the digital map of the Network of Public Forests in the area	Medium		СМАОТ
		26	Relocation and forestry restoration of isolated agricultural plots	Short-medium-long	N/A	AYTO/CMAOT
		27	Inventory and regularisation of occupations and easements in public forests	Short		СМАОТ
	Public Forest Management	28	Implementation of a municipal GIS of fee-paying plots, occupations and easements in public forests and other municipal land	Medium		СМАОТ
		29	Drafting and implementation of the project to remove non-forest waste in the Network of Public Forests within the scope of Special Plan C	Medium		CMAOT/AYTO
		30	Management of groundwater use within irrigated areas	Short		CMAOT/CHG
	Management of uses	31	Establishment of groundwater irrigation communities	Short		CCRR/AP
		32	Decommissioning of unregulated groundwater abstractions	Short		CMAOT/CHG/ CCRR/AP
Se	Surface distribution	33	Supply to Condado de Huelva and the surroundings of Doñana	Short-medium		СМАОТ
Water resources	infrastructures	34	Improvement and consolidation of the irrigation systems of the El Fresno - Comarca del Condado irrigation community	Short-medium		MAGRAMA/ CCRR
Nater	Protection of the	35	Delineation and demarcation of priority streams in the surface water network	Short		СНБ
2	Public Water Domain	36	Delineation and demarcation of the rest of the surface water network supporting the ecological corridors	Short-medium-long	N/A	CMAOT/CHG/ CCRR
	Monitoring and control	37	Modernisation and revision of the piezometric and quality control network for both groundwater and surface water.	Short		СНБ
			surface water.			

			ACTIONS	DEADLINE	IMPLEMENTATION STATUS	COMPETENT BODY
/ity	Ecological corridors	38	Drafting of the project and implementation of the ecological corridors	Short-medium		CMAOT/ MAGRAMA
nectiv	Internal network connection	39	Drafting of the project and implementation of the internal connection network	Short-medium		CMAOT/ AYTO/AP
Ecological connectivity system	Management of the	40	Signposting and marking of the ecological connectivity system	Medium		CMAOT/ MAGRAMA
ogic	ecological connectivity	41	Maintenance of wildlife crossings	Medium		CMAOT/ DP/CFV
Ecolo	system	42	Actions to maintain compatible plant cover in the ecological connectivity system	Long	N/A	СМАОТ
		43	Study on the landscape treatment of the agricultural environment in the irrigated area	Short		СМАОТ
		44	Study on erosional processes in the area of the Special Plan and its area of influence	Medium		СМАОТ
	Agricultural area	45	Inventory and study of the Restoration Plans for aggregate extraction areas	Short		СМАОТ
		46	Study of the Plan for the Improvement, Suitability and Protection of birdlife in the energy supply network to farms	Short		СМАОТ
	Forestry area	47	Drafting and/or revision of Land Use Planning Projects for Public Forests in the area	Short-medium-long	N/A	СМАОТ
studies		48	Regional inspection, surveillance and monitoring plan for administrative offences related to nature conservation	Short-medium-long	N/A	СМАОТ
Plans and studies		49	Study determining the groundwater extraction possibilities in the Tinto - Odiel - Piedras river basin district within the scope of the Special Plan.	Short		СМАОТ
-		50	Studies relating to proposed actions for replacing groundwater with surface water	Short-medium		CMAOT/CHG
	Water resources	51	Development of an annual groundwater abstraction management plan	Short-medium-long	N/A	CMAOT/CHG
		52	Development of a control programme for monitoring the quantitative status and quality of groundwater and surface water and their evolution	Short-medium-long	N/A	CMAOT/CHG
		53	Study on the reuse of rainwater for irrigation in agriculture	Short		CCRR
		54	Study on wastewater reuse for irrigation in agriculture	Short		CAPDR/CCRR
	The ecological connectivity system	55	Development of a monitoring and control programme for the ecological connectivity system.	Medium-long	N/A	СМАОТ

Source: Prepared in-house with data from the Special Management Plan for the irrigated areas located to the north of the Doñana forest crown.

Consejería de Medio Ambiente y Ordenación del Territorio (Environment and Regional Planning Authority) - CMAOT // Consejería de Agricultura, Pesca y Desarrollo Rural (Agriculture, Fishing and Rural Development Regional Authority) - CAPDR // Consejería de Fomento y Vivienda (Development and Housing Regional Authority) - CFV // Ministerio de Agricultura, Alimentación y Medio Ambiente (Ministry of Agriculture, Food and Environment) - MAGRAMA // Confederación Hidrográfica del Guadalquivir (Guadalquivir River Basin Authority) - CHG //Ayuntamiento (Local Authority) - AYTO //Diputación Provincial - DP // Agentes Privados (Private Agents) -AP ///Comunidades de Regantes (Irrigation Communities) - CCRR

Table 2. Actions described in the Programme of Complementary Measures of the Special Plan and the timeframe for their implementation.

		ACTION	DEADLINE	IMPLEMENTATION STATUS
	1	Support for vocational training (upskilling, young farmers, training for entrepreneurs). EAFRD (IFAPA training)	Short-medium	
	2	Training of advisors. EAFRD (IFAPA advice)	Short-medium	
	3	Investment in agricultural holdings, in the processing/marketing or development of agricultural production; or in agricultural infrastructure. FEADER European Funds (EAFRD, investment in physical assets)	Short-medium	
Agricultural activity	4	Incorporation of young farmers. FEADER European Funds (EAFRD, development of business operations)	Short-medium	
ral a	5	Creation of producer groups. FEADER European Funds (EAFRD, creation of producer groups)	Short-medium	
Itu	6	Conversion to and maintenance of organic farming. FEADER European Funds (organic farming)	Short-medium	
Agricu	7	Support for the creation and running of Operational Groups, and for pilot projects submitted by these. FEADER European Funds (EAFRD, cooperation (IFAPA)).	Short-medium	
	8	Economic diversification (through Rural Development Groups)- FEADER European Funds (EAFRD, Local Leader Development)	Short-medium	
	9	Aid to OPFH (FVPOs, Operational Programmes FEAGA, EAGF)	Short-medium	
	10	Knowledge transfer in the areas of organic, integrated and conventional agriculture (through seminars and conferences). FEDER AND FSE (IFAPA)	Short-medium	
	11	Experimentation (Strawberry Transform Programme). FEDER AND FSE (ERDF and ESF)	Short-medium	
	12	Good Practices Programme for strawberries, the main crop grown in the Forest Crown agricultural area. FEDER and FSE.	Short-medium	
	13	Registration in the water registry of the surface water uses by the irrigation communities whose surface area is partially or totally affected by the Special Plan (part included in the Tinto, Odiel and Piedras district)	Short	
ces	14	Granting of groundwater concessions in accordance with the existence of available resources, as established in the Tinto, Odiel and Piedras District Water Plan and in the regulations of the Special Plan.	Short	
inos	15	Closure of groundwater abstractions that do not have usage rights	Short	
Water resources	16	Technical Delimitation of the demarcation line of the watercourses located in the Tinto, Odiel and Piedras District included in the Special Plan, in order to implement its objectives.	Short	
Wat	17	Implementation of a plan to monitor the status of the Condado water body, pertaining to aquifer 27, in the part corresponding to the Tinto, Odiel and Piedras District, by incorporating nine new piezometers.	Short	
	18	Upgrading of groundwater quality monitoring stations	Short	
	19	Drafting of a new order on vulnerable zones to amend the current one (Decree 36/2008 of 5 February, 2008, which designates vulnerable zones and establishes measures against nitrate pollution from agricultural sources, amended by Order of 7 July, 2009).	Short	
	20	Hydrogeological characterisation and determination of the water reserves of the Condado water body.	Short	
	21	Support for the design of actions for installing wildlife crossings and other biodiversity-related measures, as well as for improving, maintaining and signposting rural routes to ensure their positive effects on wildlife.	Short	
	22	Support for defining the criteria for establishing the priority water network	Short	
	23	Detailed study of the network of secondary roads and forest tracks owned by the Regional Ministry of the Environment and Land Use Planning, their current state, improvement and maintenance needs, and guidelines for signposting them in relation to the regional organisation of the plan's geographical scope.	Short	
	24	Actions for conditioning, improving and maintaining rural routes owned by the Regional Ministry of the Environment and Land Use Planning that are important with relevance for the regional organisation of the plan's geographical scope.	Short-Medium-Long	N/A
Forest area and ecological connectivity	25	Maintenance of the network of firebreak areas in the forests included in the area of action and of the infrastructure for preventing and extinguishing forest fires, paying special attention to the areas in contact with agricultural areas.	Short-Medium-Long	N/A
cor	26	Aid for forest fire prevention.	Short-Medium-Long	N/A
ological	27	Actions to improve habitats suitable for species included in Recovery Plans for endangered species and other wild species, in particular the rabbit in its role as a game species and keystone species in the ecosystems.	Short-Medium-Long	N/A
d ec	28	Application of integrated forest management plans and forestry treatments to correct imbalances.	Short-Medium-Long	N/A
ant	29	Actions to improve management and enhance the value of forest land use.	Short-Medium-Long	N/A
est area	30	Aid to promote the forestry economy through sustainable forest management: purchase of forestry machinery, investment in new forestry technology, transformation and marketing of forestry products, enhancing the value of forestry uses.	Short-Medium-Long	N/A
For	31		Short-Medium-Long	N/A
	32	Investment to reduce the negative effects on biodiversity of certain infrastructures and organisms (invasive alien species).	Short-Medium-Long	N/A
	33	Production of a best practice manual on ecological connectivity, as well as knowledge transfer and an advisory service within the scope of the Plan.	Short	
	34	Study on the effects of the actions carried out within the scope of the Plan on biodiversity in order to determine the effectiveness of those actions.	Short-Medium-Long	N/A

Source: Prepared in-house with data from the Special Management Plan for the irrigated areas located to the north of the Doñana forest crown

RESULTS

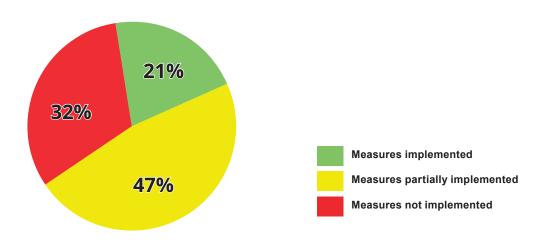
In the above tables, only short- and medium-term measures have been assessed, over the 10-year period running from December 2014 to December 2024, with the following results, as interpreted by WWF on the basis of the information available at the time of writing.

	N.° of measures	Green	Yellow	Red
Organisation of the agricultural area	18, 10 of which are short- to medium-term	2	6	2
Forestry area	11, 9 of which are short- to medium-term	5	2	2
Water resources	8, 7 of which are short- to medium-term	1	5	1
Ecological connectivity system	5, 4 of which are short- to medium-term	0	2	2
Plans and studies	13, 8 of which are short- to medium-term	0	3	
	Of 38 measures	8	18	12

Table 3. Assessment of the degr	ee of compliance with s	short- and medium-term	actions (general measures).
			actions (general measures).

Source: developed in-house, WWF Spain.

Figure 1. Percentage of general measures carried out fully, partially or not at all.



Source: developed in-house, WWF Spain.

Table 4. Assessment of the degree of compliance with short- and medium-term actions (complementary measures).

	N.° of measures	Green	Yellow	Red
Agricultural activities	12, of which all are short- to medium-term	4	8	0
Water resources	8, of which all are short- to medium-term	2	5	1
Forest area and connectivity	14, 4 of which are short- to medium-term	0	3	1
	Of 24 measures	6	16	2

Source: developed in-house, WWF Spain.

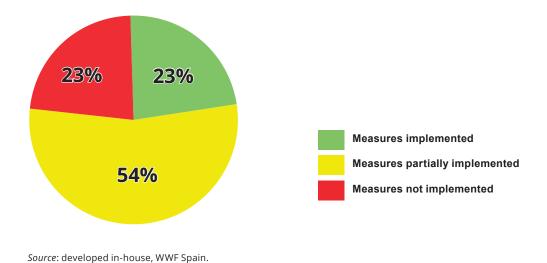


Figure 2. Percentage of complementary measures fully implemented, partially implemented or not implemented.

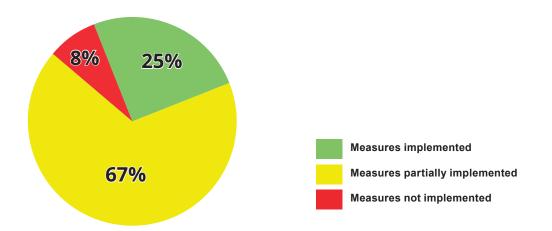
Likewise, from the set of measures of the Forest Crown Plan and the complementary measures, based on the tables and graphs shown above, adding both measures together, the following information is obtained:

Table 5. Assessment of the degree of compliance with all short- to medium-term measures.

	N.° of measures	Green	Yellow	Red
Plan measures	38	8	18	12
Complementary measures	24	6	16	2
Total measures	62	14	34	14

Source: developed in-house, WWF Spain.

Figure 3. Percentage of compliance with the set of measures fully implemented, partially implemented or not implemented.



Source: developed in-house, WWF Spain.

CONCLUSIONS

In December 2014, the approval of the Special Plan marked an important milestone, establishing a framework of broad consensus among the different stakeholders in the Doñana region on how and where to act to tackle the problem of illegal land and water use in the area. However, ten years after the approval of the Special Plan (December 2014-December 2024), according to WWF Spain's analysis, only 23% of the measures have been fully implemented.

This data shows that, although the authorities have begun to take action, they have not managed to accomplish the priority objectives and measures of the Special Plan, which was presented as evidence for compliance with international obligations to bodies including UNESCO World Heritage Site and the European Commission.

Much of the delay in implementing priority measures is due to a lack of political will and the Andalusian Regional Government's continuous attempts to offer amnesty to illegal users through proposed modifications to the law passed in the Andalusian Parliament. This has resulted not only in a delay in the implementation of the Special Plan, but also a climate of unrest, tension and unfair competition with those farmers who rigorously comply with the current legislation. It has also created false expectations among farmers in a situation of continued illegality.

Finally, WWF would like to once again stress the need for local, regional and state authorities to work in a coordinated manner, as well as to allocate the appropriate funds to tackle the recovery of the aquifer and the land use issues in the area. It is time for the public authorities to comply with all the obligations set out in the Special Plan, with no excuses and no delays, if they truly want to ensure the future for people and nature in the Doñana area.

POSITIVE AND NEGATIVE ASPECTS TO BE HIGHLIGHTED

The main measures that have yet to be implemented and those that have been implemented by the authorities are summarised in the following table, in which WWF wishes to highlight the fact that although efforts are being made to carry out some of the measures, the results are not really what was desired and there is still a long way to go.

	Positive	Negative
LAND	Remote sensing analyses by the Guadalquivir River Basin Authority and the Andalusian Regional Government (REDIAM system), as well as the use of Artificial Intelligence tools, provide real-time information on the irrigated surface area outside the zone of irrigable agricultural land and which is therefore not authorised for irrigation.	Despite the fact that the illegally irrigated area is clearly mapped, more than 1,000 hectares of irrigated land continue to be irrigated outside the zone of irrigable agricultural land (according to the latest report by WWF Spain the figure amounts to 1,190 hectares of irrigated land outside the zone of irrigable agricultural land, of which 923 hectares correspond to crops grown under plastic). In the Tinto Odiel Piedras river basin district, the Andalusian Regional Government only analyses crops grown under plastic and not others such as citrus and olive groves.
	In 2015, the Ministry for the Ecological Transition and the Demographic Challenge acquired, using European ERDF (FEDER) funds, the Mimbrales farm, which involved the elimination of 922 hectares of irrigable agricultural land.	Over this 10-year period (December 2014-December 2024), instead of the figure for irrigable agricultural land decreasing (mainly thanks to the purchase of the Mimbrales farm), the figure has remained similar (it has increased by 98.73 hectares from the original area approved in 2014). This is partly due to the fact that in the aforementioned period the Andalusian Regional Government authorised the irrigation of 999 hectares in Moguer, initially located outside the zone of irrigable agricultural land, meaning an opportunity to reduce the pressure and demand for water in the region was missed.

	Positive	Negative
FOREST AREAS	The forest areas transformed into unpermitted irrigated agricultural land prior to 1992 (Andalusian Forestry Law) have been identified. These primarily correspond to municipal public forests, many of which have been reported by environmental agents. In addition, the Environmental Prosecutor's Office has reported and initiated criminal proceedings for unauthorised changes in land use.	The total amount of forest area occupied without authorisation has not been recovered and restored. There are still 316 hectares of crops under plastic in forest natural resource special protection areas (zone A). There is concern about the possible modification of the Andalusian Forestry Law and the false expectations that may have been generated in some municipalities.
	Significant efforts have been made by the Guadalquivir River Basin Authority's water rangers, environmental agents in the Tinto Odiel Piedras, the Environmental Prosecutor's Office and SEPRONA to report and close illegal abstractions.	The files take many years to process, with the risk of them becoming out of date. There are still staff shortages in the legal offices of the public authorities.
WATER	The Guadalquivir River Basin Authority has initiated enforcement proceedings and implemented precautionary measures to seal off abstractions. To date, as of November 2024, 66 abstractions have been closed as a precautionary measure, in the summer of 2024.	Although the competent authorities know where the irrigated areas without water rights are located, they do not urgently apply precautionary measures and seal off abstractions during the campaign. In the Guadalquivir district, action has only been taken on 229 of the more than 1000 illegal hectares; in Tinto Odiel Piedras no precautionary measures have been taken to seal water abstractions.
	According to the Monitoring Commission's report on the Special Plan for November 2024, drawn up by the Andalusian Regional Government, 476 abstractions have been closed as a result of replacement surface resources for the Fresno-Guadalquivir Irrigation Community. Similarly, the Guadalquivir River Basin Authority reported the closure of 294 wells and 66 being sealed as a precautionary measure.	The abstraction closures are not very effective, as the reduction of hectares, which is the main issue, is very slow. Despite the closure of illegal abstractions, the illegal agricultural area is barely decreasing.
	In 2020, the groundwater bodies of La Rocina, Almonte and Marismas were declared at risk of not reaching a good status. In 2024, Groundwater User Communities, CUMAS, were constituted for 2 of the bodies of water declared to be at risk.	The declaration of at-risk groundwater bodies requires the basin authorities to draw up an action programme and an annual abstraction plan within one year. However, at the time of writing, December 2024, this has still not been produced. The delay of more than 4 years since the declaration means the unsustainable exploitation of this aquifer is continuing to this day, and the latest data presented by the basin authorities themselves indicate that the vast majority of the sectors into which the aquifer has been administratively divided show decreasing trends in water levels, as well as a groundwater level below that corresponding to the recharge linked to the rainfall recorded; in other words, the high degree of overexploitation continues and the general trend of the aquifer is negative.
ECOLOGICAL CORRIDORS	In 2019, the Regional Government of Andalusia analysed the ecological corridors, assessing the La Cañada- Vaquerizas and Llanos-Charcones corridors as very high- priority actions. As of December 2024, the restoration of the banks of the Arroyo del Hondo in Bonares is nearing completion. Within the framework of the Doñana Plan Commission, the figure of the person in charge of the Special Plan Monitoring Commission has been created.	The boundaries of the Public Domain of streams have not been demarcated and priority corridors, such as the Cañada-Vaquerizas corridor, have not been implemented. Infrastructure such as wells and ponds, as well as greenhouses, are incompatible with the corridors, so there can be no crops grown under plastic. However, there are 136 hectares of irrigated land under plastic in ecological corridors, where the use of greenhouses is incompatible, but the authorities have failed to intervene. Similarly, there are 149 ponds or water abstractions for irrigation. There is no clear Coordinator of the Special Plan, and there is a lack of technical and human resources to provide the Office set up with the resources needed to implement the measures outlined in the

WWF REQUESTS

TO THE ANDALUSIAN REGIONAL GOVERNMENT

- Provide the Commissioner of the Doñana Plan within the Andalusian Regional Government and the Coordinator of the Special Plan for the Forest Crown with the necessary technical and human resources, as well as sufficient funds to guarantee the development and implementation of the measures.
- → Close all abstractions that cannot be regularised in the Tinto Odiel and Piedras river basin district.
- ➔ Apply regional planning competences and eliminate all illegally irrigated fields outside the area of irrigable agricultural land.
- → Restore public forests and other occupied forest areas (zone A), which are estimated to occupy 316 hectares.
- Implement the ecological connectivity system, by creating a network of ecological corridors and an internal connection network.
- ➔ Include crops grown outside irrigable agricultural land in the remote sensing monitoring of all irrigated fields (citrus, olive groves, etc.) and not only crops grown under plastic (red berries).
- Coordinate with the Regional Ministry of Agriculture, Fisheries, Water and Rural Development on measures to reduce the environmental impacts of agriculture, mainly those related to the pollution of aquifers and surface water, and erosion.
- Ensure zero growth of irrigated land in Huelva. The increasing level of irrigation in the Tinto Odiel and Piedras district is unsustainable, as the water infrastructure in Huelva cannot accommodate these new hectares and is already creating an irrigation bubble that is affecting the sector.

TO THE GUADALQUIVIR RIVER BASIN AUTHORITY

- Allocate sufficient funds to guarantee the development and implementation of the measures set out in the Special Plan and which fall within its competence.
- ➔ Apply measures for the precautionary closure of water abstractions to all farms that irrigate land outside the area of irrigable agricultural land.
- Close all water abstractions from the Almonte Marismas aquifer that cannot be regularised in accordance with the criteria of the Special Plan.
- ➔ Approve and implement the corresponding annual abstraction plans for groundwater bodies declared to be at risk of not achieving a good status, in order to reverse the precarious situation of the Almonte - Marismas aquifer.

TO THE TOWN HALLS WITHIN THE SCOPE OF THE SPECIAL PLAN

- ➔ Report unauthorised occupation of forest land and any unauthorised building work, such as the construction of ponds, warehouses or other infrastructure; if necessary, refer these matters to the Environmental Prosecutor's Office.
- ➔ Restore public forests illegally occupied by farmers.

TO EUROPEAN SUPERMARKETS

Ensure that your supply of red berries and other products from Doñana come from farms that legally use the water and land. To do this, utilise the available tools, such as the Special Plan viewer from the Regional Government of Andalusia or the Guadalquivir River Basin Authority's artificial intelligence tool.

THE ADMINISTRATIONS MUST COORDINATE AND COMPLY WITHOUT DELAY WITH THE SPECIAL PLAN TO RECOVER DOÑANA



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