Ministry of the Environment, Universities, Research and the Mar Menor.

General Directorate of the Environment.

Juan XXIII Administrative Building

Plaza Juan XXIII, 4. 30008, Murcia

### File AAI20250009

Mr/Mrs	, with
DNI/NIE	, resident in Mazarrón, Calle
N°.	, within the period established in
the <b>Public information announceme</b>	nt of the project and the application
for Integrated Environmental Autho	orization of a biomethane and
biofertilizer production plant from o	organic waste, in polygon 8, plots 1, 8
and 9, municipality of Mazarrón, pro	omoted by Biometano Mazarrón, SL,
file AAI20250009 (BORM Number 15	<b>2 Friday, July 4, 2025),</b> presents the
following written ALLEGATIONS.	

### PRELIMINARY CONSIDERATIONS.

**1st.-**These allegations do not aim to discuss the efficiency and timeliness of biomethanation technology, which is widely implemented in other areas of the European Union, but rather to discuss the location of the project promoted by the company BIOMETANO MAZARRON SL, in the immediate vicinity of the Camposol Urbanization in the municipality of Mazarrón.

2.- Published in March 2022 by the Ministry for Ecological Transition and the Demographic Challenge (MITECO), the Biogas Roadmap is a document of intent that aims to regulate the development of a network of biogas facilities on a national scale, providing reasons, future strategies and setting objectives until the year 2026. The aforementioned document states verbatim that the effective development of biogas requires a stable and adequate regulatory framework. It also indicates that it is considered necessary to enhance the value of the renewable origin of biogas through the creation of a system of guarantees of origin that allows consumers and companies to differentiate its added value compared to other fossil-based gases and ensures the corresponding sustainability standards.

In this clear way, the Roadmap would invite citizens and businesses to prefer Biogas over Natural Gas. The Roadmap also stipulates that the direct use of biogas should be prioritized in locations close to its production. As a demographic challenge, MITECO is reflecting on the advisability of off-shore biogas generation to help prevent rural depopulation, creating economic value and employment, and promoting synergies with the needs for economic recovery in these areas, within a just transition process. "Framework for innovation and technological development of renewable energies", the Roadmap will prioritize efficient and local use, in line with the circular economy policy, and will establish detailed quantified objectives in both fields of action, determining the agents involved and the actions to be carried out.

In the BIOMETANO MAZARRON SL project, there is nothing of the concept of **PROXIMITY AND DIRECT USE IN NEARBY LOCATIONS** 

**3rd.**-The environmental impact is due to the release of pollutants such as ammonia, hydrogen sulfide, volatile organic compounds, suspended particles, and bioaerosols, particles of biological origin suspended in the air. All of these are generated by the incoming and outgoing traffic of heavy vehicles, during the handling of organic waste entering the plant, during the anaerobic digestion process, and during the storage and management of digestate.

The compounds mentioned have an intense and unpleasant odor that can cause discomfort and distress in the population. In high concentrations, they can also pose a health risk, especially to more sensitive groups such as children, the elderly, or people with respiratory conditions..

Although there are very effective technologies to reduce these impacts, they are not always completely effective.

Some scientific studies have shown that at least 30% of biogas plants frequently produce odors that can be perceived from more than 1,000 meters away.

And this is what the documentation provided by the company BIOMETANO MAZARRON SL should have studied in detail because APPROXIMATELY 1,000 METERS AWAY

## FIND THE CAMPOSOL URBANIZATION, MADE UP MOSTLY OF ELDERLY PEOPLE.

**3rd.**-The tone of these allegations would be different if the decisions of the Lorca City Council had been taken as a reference at both the regional and municipal levels..For information purposes, an extract is provided;

# PRESS RELEASE. LORCA CITY COUNCIL. DEPARTMENT OF THE ENVIRONMENT, DISTRICTS, AND URBAN PLANNING. May 29, 2025

The Lorca government's decision to reject projects that cause neighborhood conflict reduces the number of applications and brings order to the process: "We've made things clear, putting Lorca's interests first, and potential developers now know what to expect."

Angel Meca: "These plants will have to be far from population centers, not emit odors or environmental impact, and have suitable routes for the transportation of discarded resources.".

Eight projects have already been rejected. The City Council will not grant them a declaration of public interest, as they do not meet the parameters established by the Urban Planning Department, following prior consensus with the municipality's residents.

As we stated, all projects will be reviewed carefully, one by one, from a fully safeguarded perspective, prioritizing the defense of the new municipal model we seek. We committed to this, and that's what we're doing: offering citizens maximum transparency regarding the development of these types of projects in our municipality."

"We have managed to stem the wave of requests, which have been refined and neutralized after demanding compliance with the maximum guarantees and basic criteria for granting the public interest concession. Once we have defined the framework for action, the message to the developers has become clear."

In order to process the files for the installation of any of these infrastructures, The developers must meet the established requirements of convenience, necessity and opportunity, be far from population centers, without neighborhood conflict, without danger of odor emission, or environmental impact, with suitable routes for the transportation of discarded resources., also taking into account the parameters

urban developments established in the General Municipal Development Plan (PGMO).

In addition, The proposed projects must respond solely and exclusively to the real waste treatment needs of this municipality. In this regard, "Lorca City Council is aware of the need to establish sustainable solutions for the proper treatment of discarded resources from Lorca farms, and only waste generated within the municipality will be treated here." In any case, the City Council will conduct a thorough inspection of any work or circumstance that differs from the minimum conditions necessary for the suitability of the plants.

#### **ALLEGATIONS**

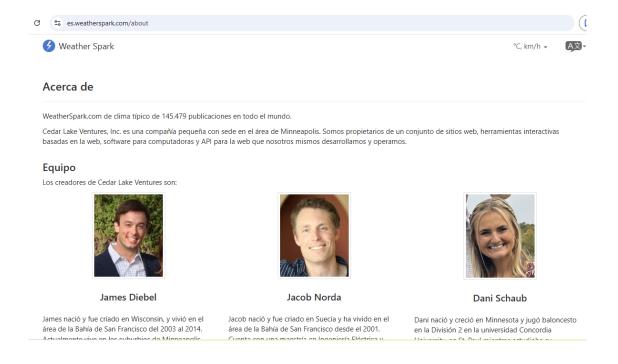
- 1. The Municipality of Mazarrón will become a regional and/or national destination for all types of waste suitable for use in a biomethanation process. This is because neither the local pig sector nor the local agricultural sector generates the waste required by a plant of this nature.
- 2°.- The location in the CASA TEJADA area can only be understood by the proximity to the communication networks that will provide the slurry and manure from Fuente Alamo, the SANDACH animal waste from the slaughterhouses of Totana and Alhama de Murcia, and even from other more distant towns, and the proximity of the LOMAS DE BUTRÓN LANDFILL in case the marketing of the digestate and the waste generated had to have a different destination than that declared in the official documentation due to "unforeseen causes".
- 3.- The urban planning compatibility issued by the Mazarrón City Council is not considered correct or in accordance with the law, since it declares the location of an industrial plant on land that is not suitable for intensive agricultural development to be compatible, considering it to be an EXTENSIVE INDUSTRIAL USE. An extensive industrial use on land that is not suitable for agricultural development can be considered a PHOTOVOLTAIC INSTALLATION, which makes extensive use/occupation of the territory, but NEVER A BIOGAS PLANT, which, due to its nature as a chemical-energy industry, makes INTENSIVE use of the territory.

PROYECTO BÁSICO AMBIENTAL AAI. Proyecto de producción de biometano y biofertilizante a partir de residuos orgánicos. BIOMETANO MAZARRÓN, SL. Mazarrón (Murcia)

En cuanto a la compatibilidad urbanística del proyecto, se solicitó el informe municipal (art. 15 RDL 1/2016 y art. 7 RD 815/2013) y, con fecha octubre de 2024, el Ayto de Mazarrón emitió el informe favorable, donde se expuso que «Urbanísticamente, conforme al Plan General, podría considerarse según el artículo B.5.3.4.8 un uso industrial extensivo, al destinarse a la clasificación y transformación de productos, en este caso residuales, de la actividad agropecuaria y producción de biofertilizante para uso agropecuario y biogás». Este "uso industrial extensivo" se encuentra entre los usos permitidos para ese tipo de suelo.

4th. The location of the BIOGAS PLANT does not comply with the MANUAL OF GOOD PRACTICES of the Spanish Biogas Association (AEBIG) which, among other considerations, establishes that *These practices include strategically selecting the location of plants, ensuring they are at least 2,000 meters from urban centers and 3,000 meters if they process animal waste. They also promote the use of technologies that minimize emissions and odors, ensuring that odor levels do not exceed 15 odor units per cubic meter in urban areas.* 

5. Wind data used to negate and/or minimize risks to human health and odors DO NOT COME FROM RELIABLE SCIENTIFIC SOURCES.



6 The location of the plant in the vicinity of the Camposol Urbanization will
lead to a significant depreciation of the real estate value of the properties
located there.

That is why, based on the allegations presented, **REQUESTS the suspension** and denial of the INTEGRATED ENVIRONMENTAL AUTHORIZATION of the biomethane and biofertilizer production plant from organic waste, in polygon 8, plots 1, 8 and 9, municipality of Mazarrón, promoted by Biometano Mazarrón, SL, file AAI20250009 (BORM Number 152 Friday, July 4, 2025),

Mazarrón, on, July 2025	
Signature	
D/Da	