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Dear OLAF Selector,

Thank you for your email on February 22 requesting further information/clarification on possible irregularities committed in projects between the village of Pedras d'el Rei and Praia do Barril, funded by the European Union and promoted by public organisations.

I suspect possible conflicts regarding property titles and/or non-compliance with public procurement rules in ALG-02-1132-FEDER-000035, MAR20-04-80S3-FEAMP-000044 and LIFE 18/NAT/PT/000927. In addition, another set of panels describing a "Trilho do Barril" is marked as having received EU funding but was not listed in your email. I know nothing about POSEUR-02-1809-FC-000027 "Reinforcement of the Tavira Island Dune Strand, promoted by SOCIEDADE POLIS LITORAL RIA FORMOSA, S.A.", except that the same "Pedras Group" of anonymous corporations which claims private ownership of the entire former fishing village and surrounding land charges tourists to use sun loungers on a large area of that beach.

I estimate that the causeway linking Pedras d'el Rei with Barril beach is used by hundreds of thousands of tourists per year. Economic revenues are obtained in many ways by "Pedras Group", which claims private ownership of all the land. The same group claims private ownership of all public infrastructure in the village of Pedras d'el Rei and presents what is at best a payment for optional services as an obligatory, required fee, otherwise resorting to measures such as making the reception of mail impossible - a serious crime in Portuguese criminal law - thus extorting up to 800 homeowners.

When I enquired with Instituto da Conservação da Natureza e das Florestas (ICNF) last year, the Regional Director for Ria Formosa Natural Park responded that he believed a concession for private use of public land existed. Town Hall of Tavira has denied answering my public enquiries, therefore breaching Lei n.º 26/2016, de 22 de agosto and EU principles of access to information and transparency, which I deem prevaricous. "Pedras Group" claims that no concession is needed because it says that it owns the land outright, although refuses to provide evidence.

"Pedras Group" appears to comprise at least 5 anonymous corporations all headed by the same people, who are known to have enormous local influence over all public entities and agencies in Tavira, including the town hall and the police. I am an outsider who does not play along with what can only be described as unwritten rules - which seem to count more than law itself here - but who rather wishes to follow the law but also to uphold others to it. I have therefore suffered what can only be called retaliation in what I consider to be of criminal character. I continue to be committed to call out the illegalities/wrong-doings, and thus put those that earn money through questionable or outright illicit activity into uncomfortable positions; but I am in a position of weakness and my presence - as has been made clear to me - has become very uncomfortable. The intimidation I have personally experienced as a result has become comparable to mafia-like levels; which has only led to confirm that this formal (be it a corporation) or informal (say an "old boys club") organisation is fully aware that they are skirting the law. I am, nonetheless, not legally versed and have no experience in dealing with this sort of criminality. On most occasions when I have attempted to get help from the authorities (town hall, police and public prosecution), I have been met with silence; be it because of the bureaucracy of a country whose language I do not understand, red tape or outright unjust decisions. The local authorities either cannot or do not want to take up this case.

I believe it is urgent and essential for OLAF to investigate these circumstances. Considering that pressuring home-owners for their private money is not beyond this group, and how appropriation of public property is their method of operation, I am convinced that EU funds have not only been misused but illegally flown into the wrong pockets. While only the fraudulent use of EU money is within the scope of OLAF, I would be thankful if - what seems to me to be - the local, corrupt mafia-esque structure suffered some sort of legal consequence for some of their actions and therefore was weakened. As I have said: the local authorities are either uninterested or might themselves be compromised.

Best regards,



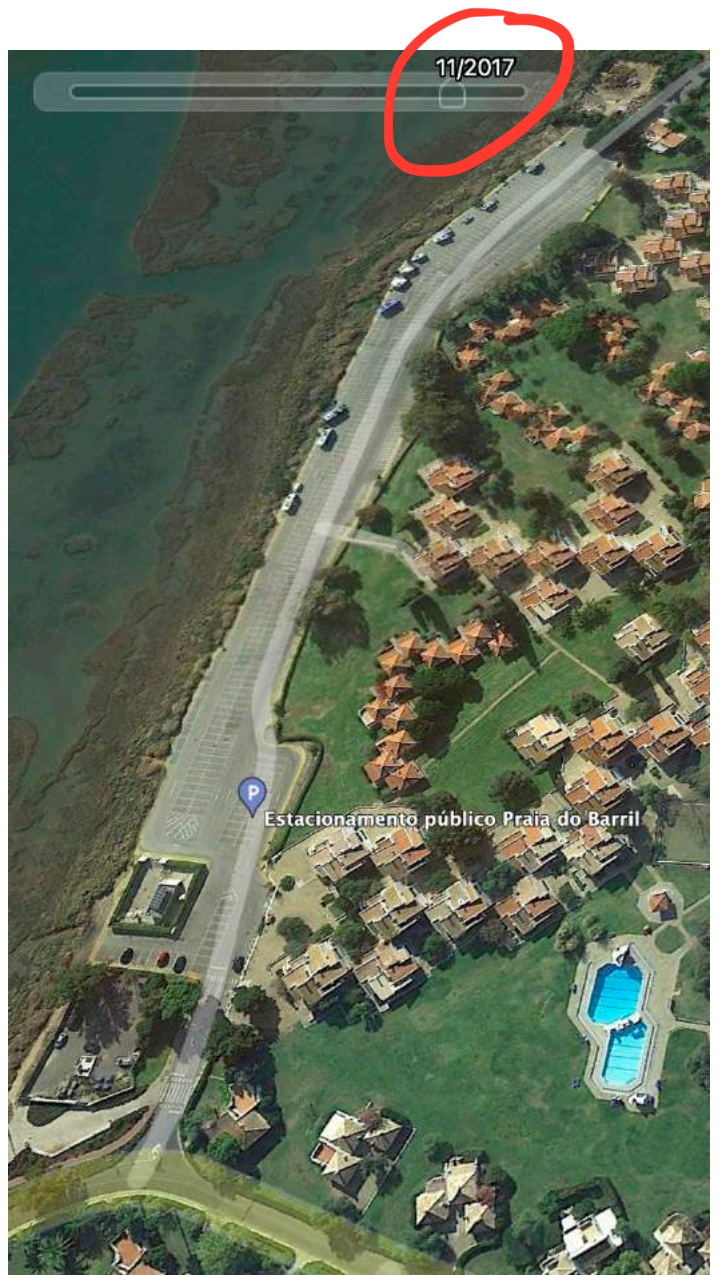
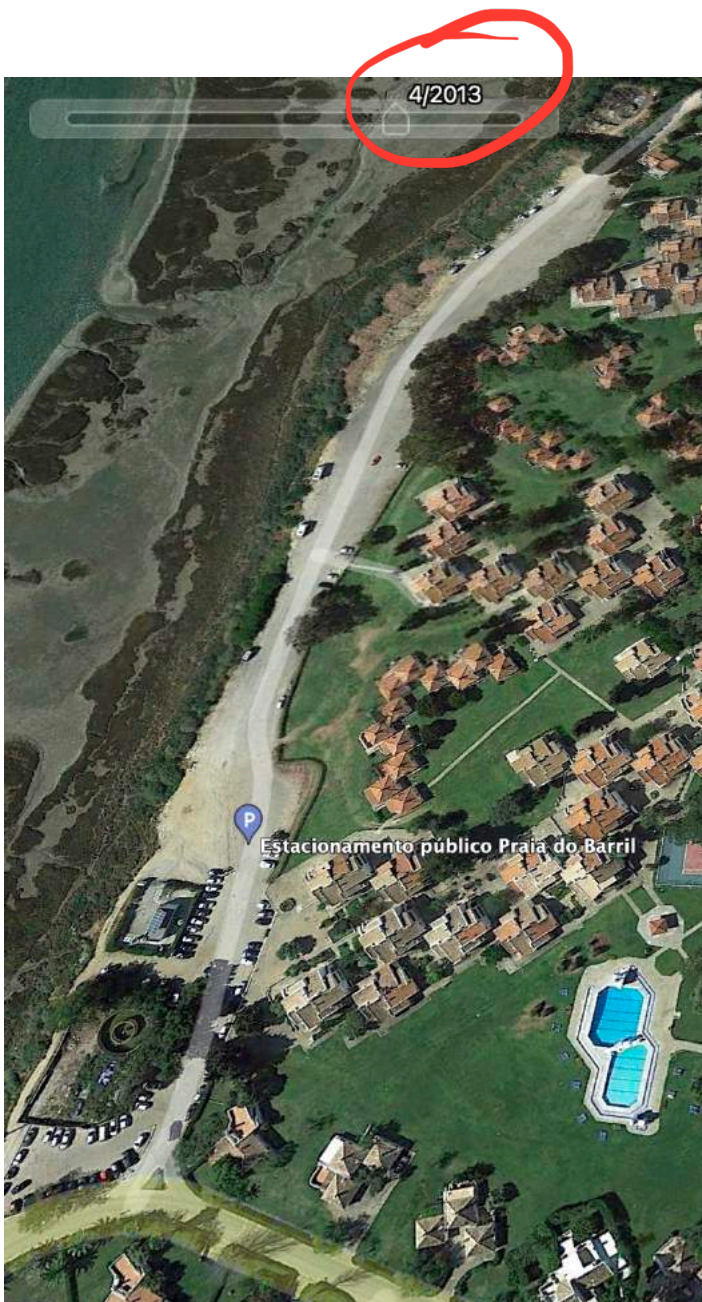
Graeme Walker

**ALG-02-1132-FEDER-000035 - Requalification of the Pedras d'El Rei/Sta. Luzia Marginal, promoted by SOCIEDADE POLIS LITORAL RIA FORMOSA, S.A.**

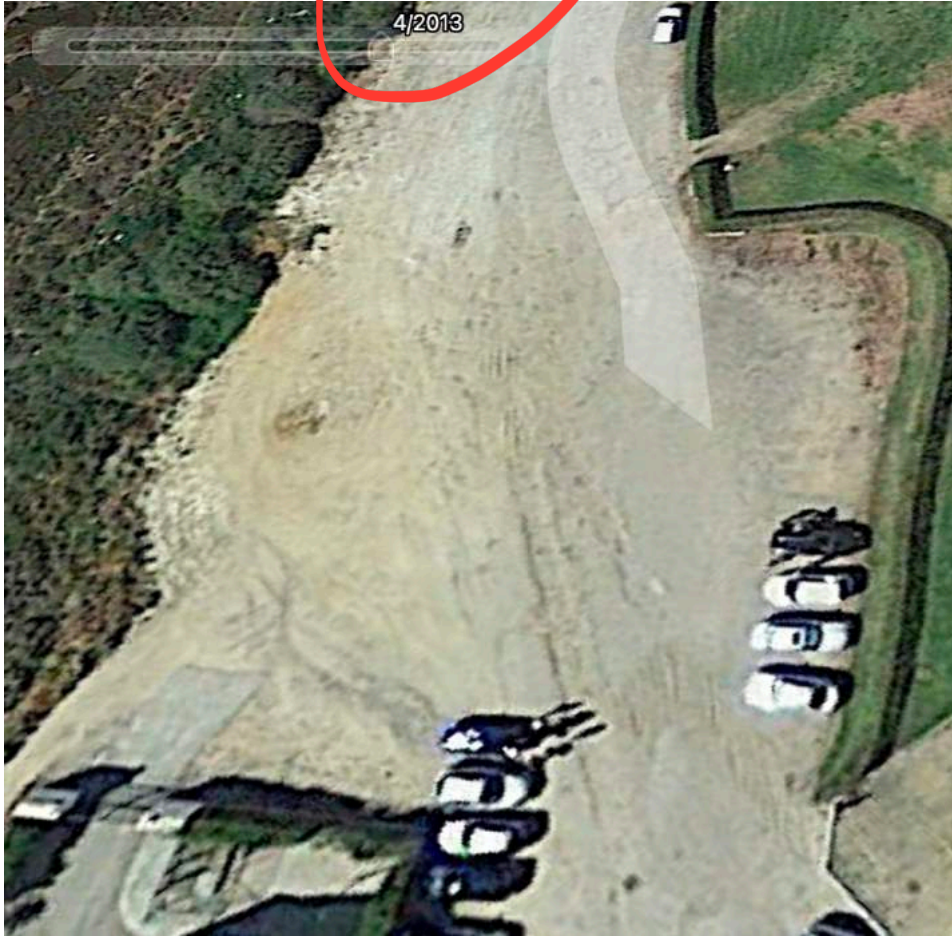
*"The aim of this project was to build a cycle path, car park and pedestrian zones on the coastal road linking the town of Santa Luzia to the Pedras d'el Rei development and Praia do Barril. This project was completed in July 2016."*

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**Response:** I am concerned that tarmac for an enormous public car-parking area may have been financed using EU money but now provides only private economic benefits. I provide two images from Google Earth, dated April 2013 and November 2017 (I cannot find images between these dates). Many tourists from Portugal and abroad, especially during summer months, park cars within walking distance of Tavira Island (via a causeway built long ago, to access a seasonal tuna-fishing settlement). Google Earth correctly labels this land, "Praia do Barril public parking"; whereas, entry of cars is blocked with a barrier and tickets are sold for up to 13€ per day by a private group of anonymous corporations trading as "Pedras d'el Rei" and other names.



4/2013



11/2017



I provide photos (taken February 26, 2024) of the car park I suspect may have been created using EU money. Several marked parking spaces include the word “PRIVADO”, whose meaning is not clear, since all vehicular access to this land is already charged with a fee of up to 13€/day:



This public land is identified on Google Earth as “public” land, but “Pedras Group” claims that it is private land and charges for vehicular access. The town hall of Tavira deny public ownership.



**Furthermore**, it is interesting that a concrete bench exists at this location. I have rarely observed any person to be sitting on that bench, throughout 2 years whilst walking past it almost every day. It is adorned with labels at either end, indicating that it was financed by two different entities. Attached to a nearby fence is the remnant of another sign which is broken:



**MAR20-04-80S3-FEAMP-000044 - Santa Luzia Fishing Routes - Octopus Route and Tuna Route, promoted by the MUNICIPALITY OF TAVIRA.**

*“This project aims to valorise, recover and publicise the maritime heritage, in particular the local fisheries of Santa Luzia. The project was due to be completed in April 2023.”*

The Octopus Route exists as a series of information panels in public spaces of the village of Santa Luzia. I have no concerns about it. **The Tuna Route**, however, is entirely located on land which “Pedras Group” of anonymous corporate entities claims to own privately. It is confusing and appears to consist of 7 blue information panels, although the panels indicate that 9 should exist. The first panel is adjacent to a sign advertising private businesses operated by “Pedras Group”, near the ticket office for its private tourist train (all on land of conflicted ownership):



The other six panels do not form a “route”, but are clustered around a complex of restaurant buildings of conflicted ownership. The yellow marks indicate positions of the panels:





When taking these photographs of the Tuna Route panels on the afternoon of February 26, 2024, I was chased and threatened by a staff member of one of the restaurants. He told me that it is prohibited to take photographs and ordered me to leave the land, whilst closely pursuing me in a threatening manner over a distance of approximately 100 meters.





One restaurant is called “Museum of Tuna”, causing confusion about whether the “Tuna Route” is part of that private business enterprise:



**LIFE 18/NAT/PT/000927 - LIFE Barrier Islands, promoted by the PORTUGUESE SOCIETY FOR THE STUDY OF BIRDS.**

*“LIFE Barrier Islands aims to characterise the local ecological requirements and conservation threats of the target species and habitat types, in order to implement effective conservation actions. The project is due to be completed in December 2024.”*

This information board is located on land of conflicted ownership:



I have not seen evidence of activity to remove invasive plant species. The “Pedras Group” which claims ownership of the land keeps a zoo of invasive and exotic red-eared slider turtles in the village of Pedras d’el Rei, one of which I recently found escaped and traversing a public road. Adjacent to the footpath of conflicted ownership, various bird identification panels are attached to trees. These panels all advertise “Pedras Group” of anonymous corporations (by reference to the toponym “Pedras d’el Rei” which it uses as a commercial trading name) and make no reference to Ria Formosa Natural Park or Portuguese Society for the Study of Birds:



## Trilho do Barril

Another set of information boards, marked with a logo of the EU Regional Development Fund, exists which is not listed in your email. This consists of 6 interpretive panels, spaced at intervals along the pathway between Pedras d'el Rei and Barril beach. The panels use brown frames of ICNF's characteristic design and include small logos of Tavira Municipality, INCF and Ria Formosa Natural Park:



These “Trilho do Barril” boards show some signs of wear and tear. The QR codes displayed on the boards simply link to the homepage of Tavira Municipal Council.



## Other signage

All this land with conflicted ownership lies within Ria Formosa Natural Park, which should be nationally-managed by ICNF according to art. 13.1 of DL No.º 142/2008 of July 24, "The management of national protected areas is the responsibility of the national authority". However, subsequent legislation of Portugal conflicts with this and appears to have reduced the national authority to little more than an observer on a committee headed by a local mayor. Despite the wide range of signage, none is prominently of ICNF (although many use the ICNF-branded style of frame). The biggest and most prominent signs are private commercial signs advertising "Pedras Group" of anonymous corporations and list its own private commercial contact details below the heading "Parque Natural Ria Formosa":



The phone number advertised on these signs as “Info Line” all belong to “Pedras Group” of anonymous corporations, which uses the toponyms “Pedras d’el Rei” and “Praia do Barril” as its commercial trade names:



“Pedras Group” advertises its commercial services on trains formerly used to supply the fishing village at Barril beach on Tavira Island:



Secondary in prominence, after the commercial signage of “Pedras Group”, is this sign with the words “Praias de Tavira” and “Praia do Barril”:



All of this private commercial signage, mixed with references to Tavira Municipality and various other entities, makes it confusing for visitors whether they are actually within Ria Formosa Natural Park.

What is clear is that “Pedras Group” claims ownership of the land and derives vast economic revenue from its exploitation for tourist purposes.

**By way of contrast, this photo shows a sign in an area of land near Olhão where the INCF headquarters of Ria Formosa Natural Park are located:**



No signs between Pedras d’el Rei and Barril beach display the words “Parque Natural da Ria Formosa” or its logo with similar prominence to those at Olhão, despite that many use the characteristic frames which represent ICNF (the national authority for nature conservation).