English version

We extend our thanks to the four presenters at the public hearing in Bouloc-en-Quercy on 08 April 2026.

In the MRAe report of 10 December 2025, it is stated that, 'la commission départementale de préservation des espaces naturels, agricoles et forestiers (CDPENAF) du Tarn et Garonne a rendu un avis défavorable sur le projet le 29 Aout 2025.' We trust that this decision will be upheld.

We recognise the need to reduce carbon emissions locally, nationally and globally. However, we oppose the proposed solar panel park project in Bouloc-en-Quercy on the grounds of its environmental impact and poor logistics, and the project's lack of value for the community as a whole.

i) Environmental impact and climate change
The key question is: *Would this project produce more greenhouse gas emissions than it saves?*

The project site is difficult to access and is distant from where the electricity needs to be delivered, thereby requiring significant infrastructure, earthworks, construction and maintenance. According to ERC methodology, construction works should be executed outside sensitive periods for fauna and flora. These combined factors mean that construction would likely take place over an extended period of time.

It is critical that the project fully demonstrate that, over its entire lifespan, it would yield significantly less carbon dioxide emissions than are lost through removal of or damage to ecosystem services on the solar park and its access roads, including the loss of carbon storage and sequestration by the forest and shrubs that would be removed and the grasslands that would be hard-surfaced. Calculation of carbon emissions over the lifespan of the project should include not merely its operational phase but the extraction of minerals; the manufacturing and import of panels, cabling and other components; clearing of forest, shrubbery and grassland for the construction of the access and perimeter roads and solar park footprint; manufacturing and erection of the perimeter fencing; installation and cyclical replacement of all components (including the 3.3 km of cable connection to the Lauzerte substation); regular monitoring and maintenance operations (including sheep husbandry); and decommissioning processes, removal of equipment and the restoration of the site to natural habitat. (For an inventory of the project's components, see the *Avis de la MRAe Occitanie*, émis le 10/12/2025, section 1.1)

Regarding the end phase, it is unclear where responsibility would lay for the decommissioning, removal of infrastructure and restoration of the site. What solid and time-unlimited guarantees and responsibilities are proposed?

Notably, the access road involves the removal of trees and shrubs, which are vital carbon sinks. A Harvard University study published in *The Harvard Gazette* (A.J. Manning, 13 October 2023) states, 'clean energy sources aren't enough to meet climate goals. Removing carbon from the atmosphere is just as important […] forests are a critical, natural carbon sink, and the clean energy transition cannot happen without them.' Furthermore, the author cogently states that, 'By shifting from large, ground-mount solar to more projects on rooftops, parking lots, and already developed lands, [we] can head off further, unnecessary damage to forests and farmlands while also meeting net-zero emission goals.'

Indeed, the MRAe (19 January 2026) recommended that the project developer expand their search for sites – particularly degraded or anthropized ones – at the appropriate scale. This recommendation is reinforced by the European Commission's *Environmental Impact Assessment* document, which states that the project developer must provide the approval authority with a report containing reasonable alternatives to the proposed site (https://environment.ec.europa.eu/law-and-governance/environmental-assessments/environmental-impact-assessment-eia_en).

Additionally, it must be asked: In what ways would the panel installation and especially the perimeter fencing inhibit the natural cycles of the site's existing ecosystem? The proposed site is less than 50m from a ZNIEFF site. Thus, what effect would this project (in all its stages) have on that protected site? The project also lacks clarity on loss of breeding and hunting grounds for a number of species, including bats and the European nightjar. The MRAe (19 January 2026) states, '*qu'aucune mesure destinée à favoriser la reprise de la végétation dans l'emprise du projet n'est proposée. Elle considère qu'en l'état, le site, en fin de travaux, est propice à l'implantation d'espèces exotiques envahissantes et que le maintien des habitats naturels et de la flore patrimoniale n'est pas assuré*.' Notably, the sector still lacks perspective on the concrete effects of solar panel parks on biodiversity in rural and agricultural settings, thus few references exist to date and experimental risks would be exercised on the Bouloc site.

In summary, we strongly contend that the joint crises of climate and biodiversity loss require fresh and innovative thinking. This project fails to offer that. Instead, it represents a shortsighted "business as usual" proposal.

ii) Community, value and local livelihoods

The key question is: *In what ways would the Bouloc community as a whole truly benefit from this project?*

While project planning was initiated in 2023, the majority of Bouloc's residents were not made aware of it until 2025. This demonstrates a lack of due care and respect for the community.

For a project of this scale and of such long duration (20+ years?) in a commune with a population of only approximately 200 persons, benefits should surely exceed mere financial compensations to the Mairie to include social, cultural and environmental gains for all. This project demonstrates no discernible value of this kind for the community.

Bouloc-en-Quercy, like other rural communes in the Tarn-et-Garonne department, relies primarily on agriculture, local artisan production and specialized leisure activities to generate income. The economic landscape is characterized by high-quality agricultural products (terroir) and rural tourism. The rolling landscape, its biodiveristy and its tranquillity are the commune's most important resources. It is the pays de serres, the patchworks of farm fields, ribbons of forest, and historic hamlets and villages – not industrial scale projects – that draw tourists, pilgrims, cyclists and parachutists and that attract people from all over to make home here.

A "Land Use Policy" study published in November 2025 discusses the potential negative impacts of photovoltaic installations on tourism economies and on land and property values. Where possible, these conceivable impacts should be quantified and taken into careful consideration before any decision is reached – a decision that has bearing on the entire human and more-than-human community of Bouloc and beyond.

For all the above, we restate our opposition to the proposed solar panel park project in Bouloc-en-Quercy. We strongly urge the developer to follow the MRAe recommendation (section 2.2), '*…l'utilisation préférentielle de zones fortement anthropisées… en priorisant les toitures de bâtiments, les espaces artificialisé (notamment les parkings) et les milieux dégradés…*'