

**MEMORANDUM ABOUT CAVING EXPLORATION LICENSES IN PICOS DE  
EUROPA NATIONAL PARK**

**Cantabrian Speleological Federation  
Castilla y León Speleological Federation  
Principality of Asturias Speleological Federation**

Further to the processing of caving exploration licenses in Picos de Europa National Park given by the Authorities (PNPE), and taking into consideration the memo about this topic that has been submitted by the Speleological Spanish Federation (FEE), the head of the Principality of Asturian Speleological Federation (FESPA), the Cantabrian Speleological Federation (FCE), and the Castilla y León Speleological Federation (FECyL), **request by means of the present public memorandum to clarify the information of the above mentioned memorandum of the FEE and to clarify some affirmations described on it by FEE president.** The mentioned communication of the FEE has created confusion in the caving community, and concern by all clubs and groups, that are involved in recreational exploration. Without a doubt, the Picos de Europa are the most important karst ranges in our country, and now it seems that recreational exploration campaigns may be in danger. And this concern is not unjustified, since from the FECyL, the FCE and the FESPA, we believe that **it is putting in doubt the seriousness of the caving community in front of the Authorities and Management of the National Park**, and therefore the normal processing of the exploration licenses.

It is an incontestable fact (and there are many documents that support this) that for many years, each and every of the caving exploration licenses in Picos de Europa were managed by the Principality of Asturias Speleological Federation (FESPA, previously known as FASE), in representation of the different caving exploration works coordinator, and also in a coordinated way with the Cantabrian Speleological Federation and the Castilla y León Speleological Federation regarding to the caving exploration campaigns developed in the territories of the National Park in Cantabria and in Castilla y León. The incontestable fact, **that up to the present moment, the above mentioned autonomous Spanish caving federations have managed caving exploration licenses in the National Park**, through the Principality of Asturias Speleological Federation, is something that Mr. Juan Carlos Lopez Casas cannot refute. And if we insist on this fact, it is because of the memo of FEE, where somebody without knowledge about the past, may assume that till recently the FEE was the unique authorizing body for caving exploration licenses, and that the autonomous federations are trying to assume this role. However this is not the case!

Besides, caving exploration licenses were managed from the Principality of Asturias Speleological Federation due to historical reasons. At the first moment the National Park was the *Montaña de Covadonga* National Park, that is only in the Asturian territory, and later, after the extension of the Park to three mountain ranges and to three autonomous states, in 1995, the whole administrative organization has been kept in the Principality of Asturias. There was - and it is - the Asturian Federation the one that for distance, **comfort, economy and logic** was managing licenses, in collaboration with the federations from Cantabrian and Castilla y León. In the same

way, when the own management of the PNPE finish the processing of the expedients and authorize the caving exploration campaigns, the licenses are sent to the FESPA, and it is the FESPA who sends them to the clubs when it is a question of campaigns developed in Asturian territory, or to the FCE and the FECyL, in case of the clubs that will explore in Cantabrian and Castilla y León territory, respectively.

It is also necessary to clarify, that the processing of these licenses to the PNPE is done in an specific application form, that the current Managing Commission of the FESPA has inherited from the previous board, and that it is not, in any case, the application form of speleological explorations of FEE, that Mr. Juan Carlos Lopez Casas refers in his document, according to the current regulation. So, not only it is not true that the territorial speleological federations want to seize from the FEE the role of requesting the caving exploration licenses to the PNPE, **but it is not also true that the new application form of requesting caving exploration license in Picos de Europa wants to replace to the application of expeditions of the FEE.** They are two questions,

- The application of expeditions of the FEE; and
- The request of licenses to the National Park.

These should not be confused with each other.

One who has read this letter so far, may wonder why there is a need of a duplication of application forms required to request caving exploration licenses in Picos de Europa, and why it is not sufficient to use the application form of expeditions from FEE for it. The answer is simple and clear: **the application of expeditions of the FEE does not serve to request any license to the PNPE because it does not gather most of the information needed by the Park to approve a license, as for example, number of tents, restricted access tracks and roads intended to be used during the campaign, location of the base and high camps, etc.**

Until the year 2010, the number of the necessary details to proceed with the request was agreed between the FESPA and the coordinators of the respective campaigns, via phone or post communication, with the effort, time and money that this means for federations and clubs. **It is in this framework, where the new application for requesting is created, with the only purpose of assisting the clubs and the federations to simplify the process of requesting licenses.**

Besides, at the beginning of the year 2011 the National Authorities transferred to the Autonomous Communities its role of being the authorizing body of the National Park, and numerous administrative reforms have been undertaken, and **this constitutes a adequate framework to insert a new change, minor for the PNPE but important for the caving clubs that explore in Picos de Europa, that is, the new application for requesting of exploration licenses.**

In relation with the Patronage of the PNPE, Mr. Juan Carlos Lopez Casas affirms that the only speleological organization that has nowadays representation in the Patronage is the FEE, and this is something that the legislation currently in force gathers and that, in no case, has been questioned by the autonomous territorial federations. However, **we must also comment that, as the own managers of the Park have reported to us, for many years nobody of the Spanish Federation of Caving**

**attended the meetings of the Patronage of the PNPE.** The conclusion from Mr. Juan Carlos Lopez Casas's memo, is that we want to seize their representation of the speleologists in the Picos de Europa National Park, but actually the FEE has never been in any of PNPE meetings, and that the FEE has never acted as representative of the cavers to the PNPE. And we must take also into account that, in general terms, the Patronage only meets once a year.

But anyway, it is true that Mr. Juan Carlos Lopez Casas is not totally wrong, as according to the national competences transfer to the CC.AA. (Spanish Autonomous Regions), we believe that the representation of the cavers in the Patronage of Picos de Europa should be performed by the territorial federations; that means in all that related to the PNPE, **so should be performed by the FESPA, the FCE and the FECyL.** The reality of our country is the one that is, and we think that concerning to Caving, there is not any reason to be different. To this respect, from the FCE, the FECyL and the FESPA, a letter has been sent to the Excma. Ms. M<sup>a</sup> Jesus Ruiz Ruiz, Adviser of Environment of the Government of Castilla y León, to the Excmo. Mr. Francisco Luis Martin Gallego, Counselor of Environment of the Government of Cantabria, and to the Excmo. Mr. Francisco Gonzalez Buendía, Counselor of Environment, Land Management and Infrastructures of the Government of the Principality of Asturias, in order to consider the possibility that **the Cantabrian, Asturian and Castilla-León territorial federations were who represent the cavers in the Patronage** of the Park, whether in a coordinated way or in a rotation based way, with possibility of delegation amongst them.

As the three territorial federations that contribute territory to the PNPE and together with the own management of the Park have agreed, in the first months of 2011, a new application form for requesting Caving Exploration Licenses; on March 1st the president of the Managing Commission of the FESPA informed Mr. Antonio Gutiérrez of the agreement by phone. According to this telephone conversation, on the 2<sup>nd</sup> of March 2011, Mr. Pablo Solares Villar sent both documents to the FEE, **without being published in the FEE website, and without any answer from the FEE to the FESPA,** via mail, electronically or telephone, and with the only the generic memo that has been distributed in the internet and by mail by the FEE. It is only after the opportune communication to the FEE that the federations from Castilla y León, Asturias and Cantabria published the new application form in their respective websites, and then communicated it later to the clubs that operate inside the National Park.

Without diverging from what has been described above, and **taking into account that Mr. Juan Carlos Lopez Casas has not attended any Patronage of the PNPE meeting before, he coordinated a meeting with the administration of the National Park and visited Oviedo some days later** to have that meeting. We do not know exactly what was discussed at that meeting, as we were not invited to attend it, but **immediately after this meeting the Direction of the National Park reported to the FESPA that Mr. Juan Carlos Lopez Casas, in his president capacity of the FEE has argued that the autonomous federations cannot undertake the role, in this case, of authoring caving exploration campaigns inside the National Park, according to the regulation of expeditions of the FEE to which the autonomous federations are submitted, as a result of which the PNPE is going to paralyze the processing of the processes of request of permissions until the caving entities do**

**not reach an agreement between them** and with the exception of those campaigns that have the already near from dates of activity.

And from the FESPA, the FCE, and the FECyL, we wonder **what agreement we have to reach with the FEE**, if the FEE has not addressed to us directly with his claims, being content with putting out an accusing memo on the Internet and with trying to besmirch the administration of the PNPE. Does Mr. Juan Carlos Lopez Casas want to sacrifice the campaigns of caving exploration at the highest level in the most important karst ranges of our country, that means Asturian, Cantabrian and Castilla-Leon campaigns, as well as Madrid, Catalan, Valencian, British, French, Belgian, Polish, etc. campaigns, for a mere act of pride? It seems to be this way. Because, **sincerely, we do not understand his refusal for accepting the existence of an application form for requesting of exploration licenses in Picos de Europa (since already a similar one existed) and not accepting, as well, that the autonomous federations are who proceed with the permissions (since already they were performing this role). If the question is to put the logo of the FEE in the new application form, please be sure that we do not disagree**, as all of us belong to the Spanish federation as much as him. And if this is not what he wants, we request him to inform us in order to be able to proceed again and with calm with the permissions, to stop causing concerns for the clubs that see their campaigns being in danger in Picos de Europa, and trying to restore, as far as possible, the respect and the seriousness which the caving community currently has for the administration and the direction of the Picos de Europa National Park. All who explore in Picos de Europa and all who have something to do related to caving exploration in Picos de Europa will be grateful to him. We believe, even, that all those who understand caving as exploration will be grateful.

Signed: Mr. Juan Colina Bruzual  
President of the Cantabrian Speleological Federation

° Signed: Mr. Julio garcía Añíbarro  
President of the Castilla y León Speleological Federation

Signed: Mr. Pablo Solares Villar  
President of the Managing Commission of the Principality of Asturias  
Speleological Federation