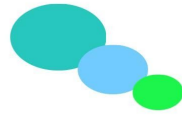


STOPDISNEY.COM



LAST CHANCE FOR
LIGHTHOUSE POINT

July 23, 2020

Dr. Mark Penning
Vice President, Animals, Science and Environment
The Walt Disney Company
500 South Buena Vista Street
Burbank, CA 91521-9722

Dear Dr. Penning,

Request for a Supplement to the Environmental Impact Statement on Lighthouse Point

We are writing, on behalf of the Stop Disney - Last Chance for Lighthouse Point campaign, to request that Disney supplement its draft Environmental Impact Assessment (EIA) for its proposed cruise port at Lighthouse Point on Eleuthera in The Bahamas with a comprehensive analysis of the potential impacts associated with climate change, COVID-19, and environmental injustice.

As you know, the campaign has attracted more than 300,000 supporters who share our organization's concerns about the threats posed by Disney's proposed project to Lighthouse Point - a unique natural place treasured by generations of Bahamians and people worldwide. We are aware that Disney submitted an EIA for the project to the Bahamas Environment, Science & Technology Commission (BEST Commission) for a technical review late last December. The world has drastically changed in the last six months. Climate change, COVID-19, and the systemic oppression of marginalized groups are arguably the most pressing challenges of our time, and pose major implications for the cruise ship port at Lighthouse Point.

Disney and the Government of The Bahamas (GoB) must make the following necessary changes and address these realities before the required public consultation on the EIA and any reasoned decision on moving ahead with the project. In order to thoroughly assess the environmental, cultural, and economic impacts of the project, Disney must expand the scope of their EIA and prepare a supplement to address the following issues.

Climate Change

At your February meeting with Robert F. Kennedy Jr., President of the Waterkeeper Alliance, and S. Jacob Scherr, Senior Advisor to the Last Chance campaign, and in a follow up letter sent on April 6th, attention was drawn to the impacts of a changing climate and rising sea levels on the project. Nearly one year after Hurricane Dorian and at the start of another hurricane season, it is more crucial than ever that Disney seriously consider the impact of increasing storm frequency and intensity, as well as other consequences of climate change. As Dr. Adelle Thomas, a Bahamian human-environment geographer, stated, **“we cannot continue with a business as usual approach that has resulted in the devastation seen by Dorian, Irma and Joaquin.”**

Disney’s own 2009 Corporate Responsibility Report said that “current scientific conclusions indicate that urgent reductions in greenhouse gas emissions are required to avert accelerated climate change. Scarcity of natural resources and threats to ecosystems and biodiversity are serious environmental issues. **A successful response to these challenges demands fundamental changes in the way society, including businesses, use natural resources, and Disney is no exception.**” Still aware of the above-mentioned scarcity, Disney further recognized in 2019 that “strategic investments in natural climate solutions...protect natural resources and conserve habitats, as well as support local communities through economic development and employment.”

It is our understanding that Disney’s EIA for the Lighthouse Point project does not address climate change, sea level rise, or the proposed Marine Protected Area (MPA) off of the Point as a “natural climate solution”. Disney also has yet to publish information about the carbon emissions associated with the project. These issues should be included in the EIA.

Disney should examine two main areas in its supplemental EIA with regard to climate change:

- 1.) The impacts of a changing climate and rising sea levels on the economics and long-term viability of the project.**

A [2018 study conducted by Climate Central scientists for the Inter-American Development Bank](#) recognizes The Bahamas as the most vulnerable nation in the Caribbean to sea level rise. In The Bahamas, 32% of land and 25% of the population are located in the most high risk areas, falling below 0.5 meters above the high tide line. [Moody’s, a well-respected credit rating agency, identifies The Bahamas as among the top four countries forecast to be most affected](#)

[economically by sea level rise, with damages from rising seas amounting to up to 15% of annual GDP.](#)

The anticipated physical and economic consequences of increasing storm frequency and intensity linked to climate change are also severe. Situated within warm Atlantic Ocean latitudes, The Bahamas is already particularly susceptible to hurricanes ([Shultz et al, 2020](#)). Recent projections published by the Caribbean Catastrophe Risk Insurance Facility suggest that with climate change and coastal agglomeration the costs of damages from extreme weather events could amount to losses of up to 9% of GDP annually by 2030 in the Caribbean ([Bresch & ECA working group, 2010](#)).

During a visit to The Bahamas after Dorian, [UN Secretary-General António Guterres said](#), “it’s impossible not to be horrified by the level of destruction caused by Hurricane Dorian in the Bahamas. In the era of the climate crisis, natural disasters have become more frequent and devastating. It’s time to change course and implement strong climate action now.”

We would suggest that Disney and The Bahamas follow the lead of the Belizean Ministry of Natural Resources and the Environment, which enacted a [series of guidelines in 2011](#) that require EIA’s to consider climate change impacts and determine if proposed projects are “**in compliance with the country’s commitment to international conventions addressing climate change.**” For example, the [EIA report for the Port of Magical Belize](#), submitted in February 2020, specifically addressed the need for mitigation strategies to address three major threats from climate change: increased ambient and sea surface temperatures, sea level rise, and increasing hurricane frequency and intensity.

Disney needs to assure that the project at Lighthouse Point is economically viable over the long-term. **Disney should conduct a thorough review of how these projected climate change impacts will affect the construction, operation, and economics of their proposed port, as well as the long-term viability of its infrastructure. To accomplish this, the EIA supplement must model sea level rise at Lighthouse Point. It must also assess and model intensifying hurricane conditions and their potential impacts on the proposed facilities and operations, taking into consideration potential hurricane-related damage to the surrounding natural environment.**

2.) **The long-term contributions of the project to climate change and its impacts.**

Disney has affirmed that the port is compatible with the company’s commitment to environmental stewardship and “ensuring a world where wildlife thrives and nature is treasured

and protected by: Saving wildlife. Inspiring action. Protecting the planet.” However, Disney has yet to disclose how this will be accomplished at Lighthouse Point. To properly address the environmental sustainability of the project, Disney must provide a thorough account of the cumulative impact of the port construction and operation. **Disney should include in the EIA supplement a thorough assessment of the project’s contributions to climate change, especially considering the particular vulnerability of The Bahamas to its impacts. This must include accounts of all emissions associated with the port’s construction, operation, and decommissioning.**

The proposed cruise port is an expansion of Disney’s operations in The Bahamas, and will result in more ships, more passengers, and more pollution in Bahamian waters and coasts. Disney must address how this increase in operation will add to climate change impacts that have significant consequences for The Bahamas. For example, ocean acidification and warming caused by our changing climate have devastated Bahamian coral reefs and other marine life that hold significant economic value as food and tourist attractions. Disney must examine the potential for its port to exacerbate this, and other problems associated with climate change.

Disney must also examine the impacts of the port on the viability of Lighthouse Point as a Marine Protected Area. As we have previously addressed, 18,000 acres of ocean surrounding Lighthouse Point were officially proposed, due to their high biological value, as a MPA as part of The Bahamas’ commitment to the Caribbean Challenge Initiative. The International Union for Conservation of Nature (IUCN) and the United Nations Environment Program have identified MPAs as effective climate change mitigation tools. Disney has said that their proposed port is compatible with a protected status of this kind, but has yet to demonstrate how this is the case.

We expect that the EIA will provide a full assessment of how construction and increased traffic might impede benefits from the area’s natural resources and establishment as an MPA. Specifically, the EIA must weigh the economic benefits of the cruise ship port against the benefits that the Lighthouse Point area would provide to The Bahamas as a Marine Protected Area.

Further, the EIA must examine whether the proposed project upholds or undermines the international commitments of the Government of The Bahamas (GoB). Most notably, the GoB enacted the National Policy for the Adaptation to Climate Change in 2005, committed to the Caribbean Challenge Initiative in 2013, and signed the Paris Agreement in 2015 in order to reduce emissions and protect the environment. The proposed project could damage the environment and aggravate climate change, meaning it also has the potential to compromise these commitments. **Disney must provide a full account of how their proposed development and associated emissions will impact the ability of both the company and The Bahamas to**

meet these obligations. Further, Disney must assess the impact of the proposed development on the company's own goals to reduce emissions beyond 2020.

COVID-19

Since Disney's submission of the EIA, the world has faced an unprecedented global pandemic and economic shutdown. The Bahamas continues to suffer as the pandemic has completely halted transportation and the tourism industry on the islands, which accounts for 60% of the country's GDP. [In The Bahamas, economic losses from COVID-19 are predicted to be at \\$2.5 billion in GDP.](#)

We appreciate that Disney and other cruise ship companies are also going through a major crisis. We were saddened by the news reports that 255 people on board the Disney Wonder tested positive and one crew member falling fatally ill with COVID-19. We are aware that Disney Cruise Lines has suspended passenger operations for its ships through September and October of 2020.

A new cruise port at Lighthouse Point could make The Bahamas even more vulnerable to the spread of infectious diseases like COVID-19. [Cruise ship arrivals in countries like Mexico and Australia have been linked to much higher rates of infection, as there is high potential for the spread of disease between cruise ship passengers and port employees, as well as host nation residents.](#)

As you know, Eleuthera is a largely-rural, lightly-populated island with no hospitals, minimal medical resources, and limited infrastructure. The protection of facility employees and local residents against disease from thousands of visitors a week coming ashore at Lighthouse Point is crucial. While there is significant pressure to rush ahead with new developments as the Bahamian economy attempts to recover from COVID-19, it is crucial that the port is developed responsibly and sustainably in the face of global pandemics of this kind.

Disney and the GoB must seriously consider the economic and public health dimensions of COVID-19 and other infectious diseases at Lighthouse Point. As such, **the EIA must include a comprehensive analysis of 1.) the impacts of COVID-19 on Disney's development, as well as the potential role of the Disney's ships visiting Lighthouse Point in the spread of infectious disease 2.) the capacity of South Eleuthera and its infrastructure to handle a public health crisis that may result from infectious diseases brought there by the proposed cruise port operations.**

Environmental/Social/Economic Injustice

Meaningful environmental reviews include a full analysis of the environmental, social, and economic impacts associated with developments like the port proposed for Lighthouse Point. For months, the Stop Disney - Last Chance campaign has reiterated the importance of a full, transparent, and publicly available assessment of the economics of the deal between Disney and the GoB at Lighthouse Point. Today more than ever, Disney should demonstrate sensitivity to systemic injustices and willingness to take action to address these issues. At a minimum, Disney's port should not add to environmental, social, and economic injustices that may be present in South Eleuthera. The EIA must include a full analysis of the equity of the project and any potential social justice ramifications.

Since Disney's submission of the EIA, the Black Lives Matter (BLM) movement in the U.S. has gained worldwide exposure and stimulated protests against centuries of racism in societies, industries, and governments across the world. We are aware that the Walt Disney Company has pledged \$5 million to support organizations, including the NAACP, that are working to advance social justice. **Disney can do much more, including in the Bahamas.** Also present in the Bahamas, historic systemic racism has led to inequality and injustice for many Bahamians of color, including those in South Eleuthera. Disney must take a serious look at the social justice impacts of their proposed port at Lighthouse Point.

[Many residents in South Eleuthera trace their ancestry back to former slaves who worked on the island's agricultural estates.](#) Today these communities experience unemployment rates as high as 70-80%. Disney's EIA should consider this history, and reflect a commitment to the reversal of years of injustice. The EIA should consider whether in fact the proposed development for Lighthouse Point is, in its current state, a fair deal for The Bahamas and South Eleuthera.

With the information that Disney has publicly released, it is still unclear how the economic benefits to the communities of South Eleuthera will be even comparable to the company's revenue from the port. The company is investing up to \$400 million in the development at Lighthouse Point. It is estimated that Disney will gain approximately \$830 million in income per ship, per year. In contrast, they are contributing only \$33 million per year to the Bahamian treasury. In order to proceed responsibly and fairly, Disney must be explicit about how this deal is fair to The Bahamas and the people of South Eleuthera.

Further, environmental injustice is pervasive in The Bahamas. Environmental injustice specifies the reality that the most adverse impacts of environmental crises, pollution, and climate change are experienced by communities and countries of color. Hop Hopkins, the director of strategic

partnerships for the Sierra Club, explained it clearly when he said: “you can’t have climate change without sacrifice zones, and you can’t have sacrifice zones without disposable people, and you can’t have disposable people without racism.” As stated above, The Bahamas has been identified as the most vulnerable nation in the Caribbean, and one of the most vulnerable nation’s in the world, to the impacts of climate change. This means that the Bahamian population is on track to be “disposed of” first. According to the 2010 Census, more than 90% of the Bahamian population is also black. Disney must analyze their contributions to climate change not just to account for their impact on the environment, but also to account for the potential perpetuation of this injustice.

Disney has chosen to develop their cruise port in one of the most economically depressed areas of The Bahamas. Disney is a major international corporation whose annual income is over five times the annual GDP of The Bahamas as a whole. The EIA must examine the economic benefits of the project to ensure an equitable deal. **This must include analysis of 1) the contributions, for better or worse, of cruise port and cruise ship operations to environmental injustice and system inequality in The Bahamas 2) the comparative economic benefits of the cruise port for the company and the impoverished communities of South Eleuthera.**

Disney is one of the best known brands on the planet. The company is also one of the most important communicators about wildlife, nature, and environmental sustainability in the world. The rapid growth over the last six months of the Stop Disney - Last Chance campaign is a reflection of the global concern about the responsibility of Disney and other major multinational corporations to show real leadership in these unprecedented and challenging times - especially when dealing with the most vulnerable of people and places. As previously stated, we expect that there will be global interest in the EIA and public consultation process for the development at Lighthouse Point.

As you may know, the Ministry of Environment and Housing has proposed draft EIA regulations pursuant to the ENVIRONMENTAL PLANNING AND PROTECTION ACT of 2019, which we assume will apply to the review of the EIA on the proposed cruise ship port at Lighthouse Point. We are now in the process of submitting comments on the draft regulations. That said, we would like to reiterate a suggested timeline for a meaningful environmental review:

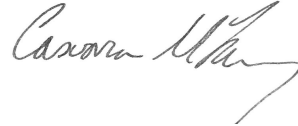
- Public release of the EIA and subsequent release of the requested supplement - ASAP.
- Period of public review, polling, and commentary - 60 days.
- Public hearings in Eleuthera and Nassau - 30 days.
- Government response and decision - 30 days.

We look forward to hearing your reaction to this request for a supplement to the EIA, the proposed timeline, and the potential for further cooperation.

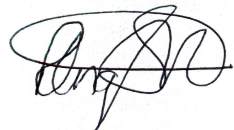
Sincerely,



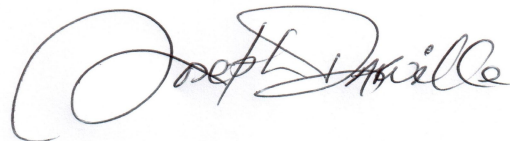
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Please reply to the signers via sam@reearth.org

cc: Jeff Vahle, President, Disney Cruise Lines
Kim Prunty, Disney Cruise Lines
The Honourable Romauld Ferreira, Bahamian Minister of the Environment and Housing

