



Center for Responsible Travel

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April 15, 2021

Independent Review of the draft Environmental Impact Assessment (EIA) on Lighthouse Point, Bahamas

At the request of the *Last Chance for Lighthouse Point* campaign, the Center for Responsible Travel (CREST) was asked to undertake an independent review of the referenced draft EIA for Lighthouse Point (LHP), Eleuthera Island, Bahamas. CREST has considerable technical and economic analysis experience related to the cruise industry globally, with considerable cruise tourism expertise and publications in the greater Caribbean and Bahamas ([CREST](http://www.responsibletravel.org)).

CREST has made a critical analysis of the draft EIA's adequacy regarding sustainable tourism, destination stewardship, climate change, and economic benefits of the project. The draft EIA outlines several positive and innovative construction measures for the docking facilities and the DCL cruise ships themselves are some of the most efficient operating in the Caribbean. However, we find that the draft EIA is flawed, does not meet international standards for sustainable tourism and destination stewardship¹ and is inconsistent with Disney's global sustainability brand. Tourism, when done right, provides many benefits for destination communities, businesses, and travelers. However, we need to use this COVID "tourism reset" opportunity to take a hard look at past unsustainable practices from the cruise industry in the Caribbean and consider how to build back better through a stewardship approach.

The draft EIA makes frequent mention of "best management practices" or BMPs that will be outlined in the Environmental Management Plan (EMP), but no such draft EMP is available to the public. Without an EMP, it is impossible to assess Disney Cruise Line's (DCL) proposed mitigation plans or determine if sustainable tourism, biodiversity, and cultural resources BMPs are even being considered. The EMP is essential and must include rigorous BMPs that meet destination stewardship criteria at the highest standard to address visitor distribution, coastal/reef protection, wildlife monitoring, renewable energy, overfishing, water and air pollution, and waste management.

¹ Destination stewardship is defined by the Global Sustainable Tourism Council (www.gstcouncil.org/) as "a process by which local communities, government agencies, NGOs, and the tourism industry take a multi-stakeholder approach to maintaining the cultural, environmental, economic, and aesthetic integrity of their country, region, or town." For CREST it is all about ensuring that the destination retains and enhances the distinctive attributes that make it attractive to beneficial tourism. This means protecting the very qualities that make a place like Eleuthera first and foremost a wonderful place to live, with the added benefit of being a wonderful place to visit.

Keeping in mind this critical gap in knowledge, CREST is still able to provide the following assessment for consideration.

Disney Commitment to Sustainability

The Disney Company's 2030 sustainability goals outline DCL objectives that are more in line with a "building back better" sustainability approach. Overall, Disney Cruise Line's commitment to sustainability and leadership has earned it the highest rating from the Friends of the Earth annual cruise ship report card (though DCL dropped from an A- to a B- in 2020 due to their handling of the LHP project in question). Disney remains the highest rated cruise ship company, but is not in great company as only 2 of 18 cruise ship companies (Disney and Silversea) earn a rating higher than a "D." ²

"The Walt Disney Company is committed to protecting the planet and delivering a positive environmental legacy for future generations as it operates and grows its business. WDI is dedicated to leveraging creativity, innovation, and operational excellence to being good stewards of the environment, and to inspiring its employees, guests, and business associates to protect the planet it shares, and the company's commitment is represented in this Project. ³ We approach new projects with a long-term strategic vision that involves partnering with government leaders, conservation experts, local communities, NGOs, and other stakeholders. Our intent is to approach the Lighthouse Point project with the same level of environmental stewardship and sensitivity we bring to other Disney projects around the world."⁴

Up to now, DCL has had a generally good record of operations in the Caribbean. That said, virtually all proposed tourist activities outlined in the draft EIA represent unsustainable mass tourism options that lack innovation and are more consistent with an amusement park than a future-thinking, sustainable tourism destination model. The draft EIA estimates that between 624,000 and 1,040,000 annual visitors will descend on the 154 acres of developed land and coastline, with rather standard tourism offerings around sun and sand, thrills, and no emphasis on ecotourism or cultural tourism options. The high tourism density proposed by Disney conflicts with their corporate sustainability goals and is a recipe for degradation and overtourism⁵ at Lighthouse Point. Without significant modifications, it is likely that the activities outlined in the draft EIA could trigger intense ecological pressure with myriad negative impacts.

² For more information, www.foe.org/cruise-report-card

³ Draft EIA for Lighthouse Point, Eleuthera, The Bahamas, pp 254 March 2021

⁴ Exhibit A Disney's Global Commitment to The Environment and Conservation: Draft EIA for Lighthouse Point, Eleuthera, The Bahamas, March 2021

⁵ **Overtourism** is tourism that has moved beyond the limits of acceptable change in a destination due to overcrowding from visitors, that can overwhelm a destination and its resources, leading to degradation or destruction of a destination's natural and cultural resources.

Lack of Consideration of Alternative Options

Upon review of the EIA and other documents, CREST noted only brief mention of Disney's consideration of other alternative locations:

"The Developer explored several alternative locations prior to purchasing the Lighthouse Point property. These locations included Egg Island, Eleuthera; Morgan's Bluff, Andros; West End, Grand Bahama; and various parcels within the Berry Islands. These alternative site locations were rejected due to the potential for significant environmental impacts or operational constraints for cruise ships and other factors. The Lighthouse Point property met Developer needs with the least environmental impact, while providing access to deep water. The commitment to an open trestle pier/berth design allows access to deep water and eliminates the need for dredging, which is generally associated with a greater environmental impact."⁶

Lighthouse Point is a fragile, nature-rich location, with proximity to a proposed marine protected area (MPA). However, LHP is now threatened by damaging impacts from mass tourism activities proposed in the EIA. CREST is concerned that DCL has not adequately explained the process, criteria, and overall results of the alternative location analysis. Consideration of alternative plans was an explicit requirement in the final draft of the 2020 EIA Regulations. We believe that Disney should be guided by global **best destination selection and management practices, and reexamine alternative options including a more altered or degraded location, a land-based low impact option, and a no development option**. Best management practices are expected standard practice by an international brand of such high prestige as the Disney Company which, in turn, should guide DCL away from the mass tourism and amusement park approach proposed in the draft EIA.

EIA Ignores the Impacts of Proposed Tourist Activities

CREST has identified several negative impacts of concern, where in many cases, the draft EIA does not adequately acknowledge or even address them. These include: poor visitor dispersal; noise, water, and air pollution; habitat degradation (land and marine); toxicity to corals from sunscreen; stress on endemic flora and fauna (with several species IUCN rated threatened and endangered); resource overconsumption; high fossil fuel use for energy generation (70%); unknown waste management protocols; and an alarming dependence on waste burning/incineration.⁷

As outlined in the draft EIA, the undeveloped LHP area would be overwhelmed by tourists as cruise visitation explodes from the hundreds to the many hundreds of thousands of visitors per year. With perhaps 20,000 weekly visitors envisioned, the LHP project would have annual cruise visitation numbers

⁶ Draft EIA Lighthouse Point Eleuthera, The Bahamas Executive Summary, March 2021

⁷ Proposed annual visitation of between 624,000 and 1,040,000 tourists will generate considerable solid and human waste. The EIA describes a considerable dependence on waste burning/incineration with no mention of the considerable negative environmental consequences, including: burning of fossil fuels to burn trash, air and water pollution, GHG emissions, and the potential environmental and health risk to tourists and local residents on Eleuthera and adjacent islands.

comparable to pre-pandemic levels in Key West, Florida,⁸ and Costa Maya, Quintana Roo, Mexico. There is no established carrying capacity baseline for LHP and the draft EIA does not present the full picture of project impacts from design, construction, to proposed site operations (see below) nor the long-term impacts of climate change on the proposed project footprint and GHG contributions. Irreparable land and seascape transformation and overall environmental degradation is a real possibility both within the project footprint as well as in ecologically significant surrounding marine habitat. Disney should commit to the establishment and monitoring of carrying capacities and visitor density and distribution, with longer term planning providing a vision for site sustainability—a sufficient EIA would have considered these essential elements to sustainability and resource protection.

The draft EIA ignores the negative environmental impacts of these tourist excursions on the environment, wildlife, and ecological integrity of LHP and the surrounding marine areas. Potential long-term negative impacts on marine mammals, corals, finfish populations, and overall ecological integrity of the marine environment are dismissed in the EIA with unsubstantiated claims that the project will have no impact on land or marine biodiversity. We particularly take exception to the March 10, 2021 DCL press notice that has the false and misleading headline, “EIA shows “no loss of biodiversity” expected for DCL’s proposed LHP Project.”

On-land impacts of nearly one million visitors per year is dismissed in the EIA as not having a negative effect on the environment or biodiversity. However, CREST anticipates that the extremely high visitor density on such a small and fragile area will result in significant negative impacts from human foot traffic, waste generation, water purification and consumption, energy generation and sunscreen usage toxic to corals. In addition, we are alarmed by watercraft excursion activities proposed in the draft EIA that present considerable risk to the ecology of LHP and surrounding areas.

Personal Watercraft (PWCs): or “Jet Skis” is a proposed “thrill-seeker” activity that one would find in a high density, already degraded marine amusement park area, not a pristine, currently wild corner of the Bahamas. PWCs are a scourge on the environment, as they contaminate the water and air, create serious negative impacts on birds (nesting, feeding, and displacement), and can operate in shallow near-shore marine habitats that results in serious shoreline erosion, turbidity, and sedimentation problems in shallow productive waters like those found at LHP. The EIA estimates that DCL will be at LHP for 3 to 5 days/week year-round, which if operating just 20 PWCs on-site, will translate to between 2,730 gallons and 4,550 gallons of gas and oil spilled in the inshore waters.⁹ In this example, these same 20 PWCs would also emit

⁸ As of November 3, 2020, Key West residents passed 3 referenda, approved by 60 percent or more, to limit the number of cruise passengers disembarking to 1,500/day, to limit the capacity of cruise ships calling in port to 1,300 people, and to give priority to ships with the best environmental health and safety records. Based on CREST’s 2019 research in Key West, it is likely that these regulations stemmed from growing citizen remorse around cruise tourism’s overtourism impacts.

⁹ It is estimated that a PWC “thrill ride” of 2 hours duration dumps on average 3.5 gallons of oil and gas as part of regular operations. Operating 10 hours/day, this translated to 17.5 gallons of gas/oil dumped as an operations by-product. Compounded over a range of minimum 156 days to maximum 260 days of operations at LHP, this means PWC operations would dump between 2,730 to 4,550 gallons of gas and oil per year.

smog/GHG into the currently clear air of LHP equivalent to the emissions of between 3,120 and 5,200 passenger cars each driven 100,000 miles.¹⁰

Banana Boat Rides and Fishing Boats: the EIA does not specify the scale of thrill-seeking banana boat rides and fishing excursions for cruise passengers, but these activities will result in considerable negative impacts including: water, noise, and air pollution; potential reef disruption and damage; overfishing (bonefish, groupers, and snappers are all commercially important species in the area) and disruption to off-shore pelagic ecosystems as a result of tuna and other deep-sea trophy fishing.

Lack of Specifics on Economic Benefits

Disney has shown considerable corporate interest in being a leader in sustainability. However, the draft EIA conflicts with this interest and does not consider sustainable tourism or community-based economic development. The EIA lacks any details that explain the economic benefits projections, and there is no way to determine what the actual economic benefits will be for local communities on Eleuthera, one of the most economically depressed areas of the Bahamas. CREST stands ready to work with Disney Cruise Lines to champion responsible tourism development at LHP and throughout the Caribbean leading to a responsible post-COVID recovery. CREST encourages DCL to lead by example and hold itself to a higher standard by providing a more transparent economic analysis and projections.

The draft EIA and other DCL documents state that the LHP project will generate an \$800 million increase in Bahamian GDP and a more than \$355 million increase in Bahamian government revenues over a 25-year period. Unfortunately, the EIA does not make the case for narrowing the wealth gap and improving the wellbeing and economic benefit of local communities. There is a genuine risk of economic leakage with most of the economic benefits received by others outside Eleuthera and The Bahamas. This is a significant problem with the cruise industry in general, and a key goal for a responsible recovery is to ensure fair and equitable economic benefits for local communities. CREST supports the recommendation to release the Oxford Economics Study results and the methodology used to produce these results so that all stakeholders can review the details and determine the validity of the claims of considerable community economic benefits.

Finally, more detailed targets should be cited within the EIA that solidify the role of the local community within port operations. Similar targets that have been established in the construction process (overall ratio of 80 percent Bahamians) should also be created for ongoing employment in port operations, as well as for the other socio-economic commitments that do not currently establish concrete dimensions for success. Disney must also ensure that all port employees and local third-party vendors are subject to fair wages and just bargaining processes.¹¹ Markers should be established to determine the ratio and

¹⁰ A single 100 horsepower PWC one day's operation (10 hours) emits the same smog/GHG as driving a new passenger car 100,000 miles. 156 days x 20 PWC = 3,120; 260 days x 20 PWC = 5,200.

¹¹ CREST's 2019 book, *Cruise Tourism in the Caribbean: Selling Sunshine*, revealed that an estimated half of what the cruise passenger spends for excursions and in recommended stores is kept as commissions by the cruise line or

revenues of duty-free shops and international brands to local shops and vendors in port, as to maximize benefits to the local economy and reduce economic leakage.

It is not too late to support an enhanced level of cooperation amongst Disney, Bahamian government agencies, local communities, and NGOs for this project. At CREST, we encourage the redesign of this project that meets the new normal of sustainable tourism, more equitable economic benefits, and genuine destination stewardship. The world is watching, and the Disney Company has the opportunity, and responsibility, to develop a true, sustainable tourism destination model for cruise tourism.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory Miller", with a long horizontal flourish extending to the right.

Gregory Miller, Ph.D.
Executive Director
Center for Responsible Travel

its agents. Additionally, anecdotal stories collected by CREST in various Caribbean port-of-call showed that third-party operators often entered a “race to the bottom” to be contracted by cruise lines.