Statement from the "Stop Disney: Last Chance for Lighthouse Point" Campaign

The Bahamas Deserves A Better Deal.

It is now clear that Disney Cruise Line (DCL) wants to ram through environmental approval of its proposed \$400 million cruise ship port at Lighthouse Point in Eleuthera - sadly with the full support of the Bahamian Ministry of the Environment and Housing. The Ministry appears poised to accept DCL's Public Consultation Report (PCR) which summarily rejects an unprecedented number of though critical comments of its Environmental Impact Assessment (EIA) have yet to be adequately addressed. DCL has asserted that its EIA should be accepted as it stands, though it fails to adequately address critical issues about the project, including the economic value to the Bahamas and consideration of alternatives.

Disney claims that it applies the same environmental standards to projects in the U.S. and elsewhere in the world. Yet they are taking advantage of the weaknesses in the Bahamian regulatory system to push ahead with this ill-considered project.

Therefore, we call upon the next Government of The Bahamas, to be elected on September 16th, to undertake a formal reconsideration of the proposed Disney project at Lighthouse Point, including requiring DCL to supplement its EIA with additional analyses and consultations.

We call upon Disney's leaders to reconsider this project which - based on this EIA - is not consistent with Disney's commitment to environmental protection.

We ask the Bahamian Government and Disney to consider carefully the comments of the Bahamas National Trust on the Lighthouse Point project - which were entirely omitted from the PCR - "...that the best use of this area would be for the land and surrounding marine environment to be established as a protected area. LHP is of world-renowned outstanding beauty worthy of world heritage status and is currently listed as a Key Biodiversity Area (KBA)."

We agree with the BNT's view that the EIA is "not complete', including in regard to plans for the construction of a massive artificial beach. We also believe that this decision on Lighthouse Point should be part of a broader national discussion of the future of cruise ship tourism.

Economics

DCL still refuses to divulge economic data or engage in an open discussion on whether **this is a "good deal"** for Eleuthera and The Bahamas. The PCR repeatedly points to the results of an Oxford Economics study touting the economic benefits of the project for The Bahamas. Disney claims the full study will be made publicly available, yet they still have only released a summary powerpoint presentation on the study. DCL has refused to address the huge disparity between its earnings from Lighthouse Point - estimated at \$830 million per cruise ship each year - and that of The Bahamas - \$805 million over 25 years.

Alternatives

The consideration of alternatives is what makes an EIA of real meaning and value to decision makers and the public. Yet DCL selected Lighthouse Point from a number of candidate sites without providing any public engagement, and claims that the consideration of other alternatives is outside the necessary scope of the EIA. The only alternative mentioned in the PCR is the "no action alternative," for which no one is advocating.

DCL continues to ignore the land-based sustainable development alternative for LHP that One Eleuthera Foundation, The Island School, and other Bahamian NGOs have been developing for almost a decade. Our campaign supports this alternative, as it could provide more jobs and economic opportunities for local communities. The campaign has never asked Disney to leave Eleuthera. Rather, it has encouraged DCL to work with local NGOs on a lower-impact tourism model that would provide more local benefits and be more resilient in a changing world. The campaign has repeatedly offered to cooperate with DCL to find an alternative location for its cruise port - preferably at an already degraded site that could benefit from rehabilitation.

Climate Change

DCL continues to ignore or downplay the impacts of climate change and sea level rise. Their stance is particularly troubling as The Bahamas is still suffering from the damage caused by climate-charged Hurricane Dorian in 2019. The United Nations IPCC climate science panel's recent report makes clear that society has run out of time to stop climate change and immediate action is required to avoid further overheating. Yet DCL refuses to undertake studies to determine the impacts of climate change on their proposed cruise port. Further, DCL's EIA fails to examine the cumulative impact of its proposal, for example, excluding any calculation of the project's carbon footprint associated with the substantial emissions from its operation of the port and cruise ships.

Marine Protected Area and Biodiversity

In the PCR, DCL finally acknowledges that the waters surrounding Lighthouse Point have been proposed for designation as a "Marine Protected Area". The PCR asserts that the proposed cruise port is compatible with an MPA, but does not point to even a single study to support its conclusion.

We appreciate the in-depth technical studies on selected species and habitats at the site, but DCL's assertion that the project will have no adverse impacts on species lacks sound basis. DCL admits that it has commissioned a study on commercially important bonefish and will continue to monitor for the presence of sea turtles. This work should have been undertaken as part of the EIA's preparation which Disney says took three years. In regard to the coral reefs, DCL ignored deeper, offshore reefs that could be harmed by construction and operation of the port. The EIA also does not address impacts of imported beach sand washing onto endangered coral reefs.

As the Jamaican Supreme Court held in the Pear Tree Bottom decision (Northern Jamaica Conservation Association and JET v. NRC and NEPA, Claim No. HCV 3022 (2006)) when evaluating the adequacy of an EIA that was missing a marine ecology report for a

large-scale resort development proposed in a sensitive coastal area, "if there is going to be effective public discussion then all the information that ought to be disclosed must be disclosed."

Disney's leaders need to change DCL's course at Lighthouse Point.

The environmental review process in The Bahamas should be an opportunity to bring people together to participate in this major decision on Lighthouse Point. Instead, DCL chose not to engage with major Bahamian environmental groups critical of the project. Also DCL has split the communities in South Eleuthera. A climate of fear has arisen with concerned voices having been intimidated and silenced.

We have also been disappointed by the reluctance of a number of individuals and organizations within the environmental community and media to challenge Disney. Disney's ownership of National Geographic, its long-standing partnerships with a number of major conservation organizations, and funding for Bahamian conservation efforts do not give the company a dispensation from scrutiny for its proposal for Lighthouse Point.

Disney must be responsible for its own actions, as the Ministry currently does not have the resources nor the political will to do more than go through the motions of the EIA review. DCL has claimed repeatedly that it will not proceed with the project unless it can be shown to be "environmentally responsible." Such a determination simply cannot be reasonably made on the basis of the current EIA.

Much more is at stake here than the beloved and long-contested southernmost tip of the island of Eleuthera. This is a question of whether Disney - one of the world's most important communicators on nature and environment - is really serious about its environmental commitments at this critical time. Disney has the opportunity to emerge as a global leader in the fight against climate change. In order to do so, they must change course at Lighthouse Point.

About the Campaign

The "Stop Disney: Last Chance for Lighthouse Point" campaign was launched in July 2019 in opposition to DCL's proposal to build a cruise ship port at Lighthouse Point, the southernmost tip of Eleuthera. The campaign's partners now include major Bahamian environmental groups - Bahamas Reef Environment Education Educational Foundation ("BREEF"), reEarth, Save the Bays, and Waterkeepers Bahamas - and two international groups - Waterkeepers Alliance and Friends of the Earth United States. More than 450,000 people have supported our change.org petition. For a record of the campaign's engagement with the Bahamian Government and Disney, see www.stopdisney.com/press.