

Zhongdong Tang
Regional Director
China Harbour Engineering Company
(CHEC)
8 St. Lucia Avenue, 5th Floor
Kingston 5
Jamaica

28 April, 2015

Dear Sir,

Re: Concerns over proposed development of a transshipment port on the Goat Islands and Portland Bight Protected Area

The International Union for Conservation of Nature (IUCN) is the world's oldest and largest global environmental network. We write to you today to express our concerns about the proposed construction by China Harbour Engineering Company (CHEC) of a large port and industrial facility in Jamaica's Portland Bight Protected Area (PBPA), despite the strong environmental concerns that have been raised both in Jamaica and abroad.

The PBPA was declared a protected area in 1999, under Jamaica's main environmental law – the Natural Resources Conservation Authority Act, for its outstanding biological diversity and globally important ecosystem services (see Annex to this letter). IUCN and many others in the international community are particularly concerned that destruction of these areas and their coastal-marine resources will compromise livelihoods, increase the vulnerability of coastal communities to storms and sea level rise, and harm biodiversity irreversibly.

Jamaica and the People's Republic of China are both Parties to the Convention on Biological Diversity (CBD) and have therefore made a commitment to biodiversity conservation, particularly to the Strategic Plan on Biodiversity and its accompanying Aichi Biodiversity Targets. Specifically Aichi Target 12 states: *"By 2020, the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline has been improved and sustained."*

IUCN calls on CHEC to follow the Environmental Guidelines on Foreign Investment and Cooperation as issued by China's Ministry of Commerce and Ministry of Environmental Protection. The guidelines direct Chinese companies to regulate their environmental behaviours in foreign investment and cooperation, promptly identify and minimize environmental risks, actively perform environmental responsibilities, and support the sustainable development of their host countries.

Smith Warner International Ltd¹, (SWI) issued an independent report exploring possible site options for the transshipment port. They clearly stated in their findings that, *“Regardless of how the development is done, and whether or not appropriate mitigation strategies are employed, there will be irreversible damage to the natural environment. The initial negative impacts will primarily be from construction activity in the dredging and reclamation works. The operational impacts will range from the change in the hydrodynamics (water circulation) of the area to the risk of oil spills and hazardous materials associated with any port or industrial activity”*. Similarly, the recent analysis by the Conservation Strategy Fund² showed Macarry Bay (to the West of Goat Islands) to be better in all characteristics considered, including costing an estimated \$200 million less in construction costs when compared to development at Goat Islands. Environmental damage arising from the development has also been quantified as being three times higher on Goat Island than on Macarry Bay. The Conservation Strategy Fund’s report states that, *“...we find significant likelihood that this is at least one option for building a transshipment port and logistic hub at lower cost and with less environmental damage than building at the currently proposed Goat Island site”*. We urge CHEC to examine these findings and to seriously consider the independent evidence and information provided in these reports.

It is widely known that nature freely provides us with services and resources. If we value and protect nature, then in turn we provide a green and growing economy while safeguarding future generations. IUCN, together with the Species Survival Commission, stands ready to provide scientific and expert advice and technical assistance on this issue, as needed.

Yours sincerely and respectfully,



Inger Andersen
Director General

IUCN (International Union for Conservation of Nature)



Simon N. Stuart
Chair
IUCN Species Survival Commission

¹ “Potential Site Options for a Logistics Hub in Jamaica”, report by Smith Warner International.

² “Economic Comparison of Alternatives to Building a Port on Goat Islands: Does Jamaica Need to Sacrifice a World Class Conservation Site in Order to Build a World Class Port?”, report prepared for C-CAM by Conservation Strategy Fund, funded by Critical Ecosystems Partnership Fund.

Annex: Portland Bight Protected Area

There are six game sanctuaries in the PBPA, all declared under the Wildlife Protection Act. There are two forest reserves at Peake Bay and Hellshire, declared under the Forest Act, and three fish sanctuaries at Three Bays, Galleon Harbour and Salt Harbour, declared under the Fishing Industry Act.

The Portland Bight wetlands and cays (small islands) have been designated as a Wetland of International Importance by the Ramsar Convention and are recognized as an Important Bird and Biodiversity Area by BirdLife International. The nearby Hellshire Hills also are home to the last remaining population in the world of the Critically Endangered Jamaican Iguana (*Cyclura collei*), the recovery effort of which is among the most recognized conservation success stories in the world. The Goat Islands have long been considered as a key component in the recovery plan for this species³.

The PBPA coast, including the two Goat Islands, also contains the largest remaining mangrove system in Jamaica, accounting for 21% of the country's mangroves. Along with extensive seagrass beds and coral reefs, these mangroves provide a large nursery area for fish, crustaceans, and molluscs which provide livelihoods and food security for thousands of Jamaicans.

³ Jamaican Iguana Species Recovery Plan, 2006 – 2013, Edited by Tandora Grant, Lee Pagni, and Byron Wilson

