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TURKS & CAICOS REEF FUND REVIEW FINDS THE DOLPHIN COVE ENVIRONMENTAL IMPACT ASSESSMENT TO BE DEFECTIVE.

22 JUNE 2016, Providenciales, TCI – The Turks & Caicos Reef Fund (TCRF), the only environmental advocacy non-governmental organization in the TCI, with the help of several outside expert advisors have completed their review of the Dolphin Cove Environmental Impact Assessment (EIA) and have determined that the document is wholly inadequate to justify giving the project Detailed Development Permission by the Planning Board at this time. A 39-page document outlining the deficiencies found in the EIA has been submitted to the Department of Planning and the Department of Environment and Coastal Resources.

“We had to fight hard to gain access to this document, despite the fact that the Environmental Charter, a treaty signed by the TCI Government and the UK Government in 2001, mandates that this process be open and public,” said Don Stark, Chairman of the TCRF. “Once we were able to gain access after appealing to both the Permanent Secretary for Planning and the Attorney General’s office, we spent many hours of our own time and that of volunteer experts in various fields covered by the EIA reviewing the document. This is the first time that an EIA has been made available for public review. In sum, the document should be rejected by Planning and if they are serious about moving forward, a new and properly conducted EIA must be done.”

Here are just a few of the deficiencies the TCRF and its advisors identified:

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1. The conclusion of the report, as stated in the Non-Technical Summary, “It is anticipated that the proposed development will have, overall, a positive impact to the economy by increasing financial revenue in Grand Turk, while simultaneously maintaining the integrity of the natural environment encompassing the project site” is not based on any facts or actual data. No quantitative socioeconomic impact analysis was conducted to determine whether the Dolphin Cove facility would decrease the revenue of existing tour operators who are also dependent upon the cruise ship visitors for their livelihood.
2. The statement, “The construction of the Dolphin attraction is anticipated to stimulate sustainable economic growth in Grand Turk through increases in annual tourist visitation” is not based on any existing or collected data and, consequently, is not a valid statement.
3. The second objective is the “assurance of all concerned stakeholders that environmental considerations have been taken into account in project planning“ has not been achieved as only a small selected group of local stakeholders were consulted and no local or international environmental experts or organizations were consulted.
4. The “experts” used for parts of the EIA are not qualified. The marine mammal expert does not meet the qualifications for a NOAA qualified marine mammal expert, as he only has a high school degree and no formal science training. The Socioeconomic Assessment done by a person without any training in that area. The terrestrial consultant misidentifies a significant proportion of the species listed as present at the site, many of which do not occur in TCI during the times that they were reportedly observed.
5. The authors of the EIA themselves state in several places that the bird surveys were inadequate (and additional surveys should be conducted before construction begins) as the bird surveys completed were conducted only during the month of July and did not survey during breeding and winter migratory bird populations, yet they conclude the impact is not significant – clearly an irrational conclusion given their own stated shortcomings of the survey work completed.
6. Similarly, the authors of the EIA recommend additional surveys of marine habitats “ensure the conclusions presented here are valid and accurate”, but then again they conclude the impact will be not significant, another conclusion not based on fact.
7. As with the marine habitat and bird assessments, the turtle assessment concludes the impact will be not significant despite the authors saying that no surveys were done during turtle breeding season (and this area is a known turtle breeding area).
8. There are no economic analyses in the report, but they conclude that there will be a positive economic benefit. Such a conclusion needs to be factually quantified and measured against potential negative financial impacts (e.g., other tour operators losing business and stay over visitors not coming as a protest the dolphinarium).

9. The proposal to use local swimming pools to house the dolphins in the event of an emergency is impractical and illegal under TCI's Marine Mammal Regulations.
10. No provisions in the plan are made for a pool or pools to isolate sick, injured or pregnant dolphins, which are required by local regulations and international standards.
11. The report is inherently biased, with much of the "data" presented being provided by the proponents of the development. No alternatives are suggested, and predicted environmental and socio-economic impacts are underplayed or ignored.

"World sentiment has been shifting over the past few years against captive marine mammal facilities as evidenced by the recent decision by Sea World to stop their orca breeding program and the National Aquarium in Baltimore, Maryland's decision to remove their dolphins from exhibit and build a natural marine sanctuary for them," added Mr. Stark. "In fact, our organization has already been in contact with the National Aquarium about considering the Turks and Caicos as the location for the sanctuary they intend to build for their 20 dolphins. As many are aware, since they participated in the effort, the TCI was the site where the last three captive dolphins from the UK were brought and successfully rehabilitated and released into the wild. A dolphin sanctuary, which is a natural habitat for dolphins, but without the entertainment features of a commercial swim-with-the dolphins facility like Dolphin Cove, would fit much better with the TCI's 'Beautiful by Nature' marketing and would allow for economic benefits, while eliminating the negative stigma associated with swim with dolphin facilities."

"TCRF believes that the TCI deserves an EIA process that is competent, open to everyone and effective and complies with international standards for best practices for public consultation. We are committed to ensuring that this takes place," said Mr. Stark. TCRF will make available to any one interested a copy of the review of the EIA sent to Planning and DECR. Simply send a request to info@tcreef.org.

About TCRF

Founded in 2010, the Turks & Caicos Reef Fund is an all volunteer-run organization that provides funding for education, research and conservation programs to individuals, organizations and agencies that help to preserve and protect the environment of the Turks & Caicos Islands. Our goal is to have at least 85% of all funds raised through voluntary contributions from divers and snorkelers visiting the Turks & Caicos Islands directed to the Fund's programs.

Anyone wishing to donate or assist the TCRF in any way can contact them through their website, www.TCReef.org. Scuba divers visiting the islands are encouraged to make a \$10 donation through the purchase of a dive tag that can be attached to their dive gear to show their support. Snorkelers visiting the

islands can show their support through the \$5 purchase of a pink or blue silicone wristband. A complete list of outlets for TCRF merchandise can be found on the organization's website.

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