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> Hon. Robert Pickersgill Minister of Water, Land, Environment and Climate Change 25 Dominica Drive Kingston 5 Jamaica

29 January, 2014

Your Excellency,

RE: Proposed development of a trans-shipment port on the Goat Islands and Portland **Bight Protected Area**

We write to you today because we are aware that the government of Jamaica is seriously considering a proposal to develop an extensive trans-shipment port on and around the Goat Islands, in the Portland Bight Protected Area (PBPA). While we recognize the need for Jamaica to increase employment and investment opportunities, we are concerned about the severe impacts on this environmentally unique area.

The PBPA is considered of global importance because it is the Caribbean's largest contiguous swath of intact dry forest and is critical for the survival of many threatened species (see details contained in the Appendix), including several that are endemic to the region (and are therefore found nowhere else in the world). These include species such as the Critically Endangered Jamaican Iguana Cyclura collei, the Portland Ridge Frog Eleutherodactylus cavernicola, the Jamaican Brown Trope (Thunder Snake) Trophidophis jamaicensis, the Blue-Tailed Galliwasp Celestus duquesneyi and the Bahama Mockingbird Mimus gundlachii hillii. The recovery effort of the Jamaican Iguana in the pristine forests of the Hellshire Hills is among the most recognized conservation success stories in the world, demonstrating that a species once considered extinct can be saved and put on the road to recovery. There are also at least 379 plant species that have been recorded in the PBPA, with at least 50 of those endemic only to Jamaica, and 17 of conservation concern through their status on the IUCN Red List of Threatened Species.

The PBPA provides irreplaceable ecological services to Jamaica. The vegetation of the PBPA provides tens of millions USD annually in carbon sequestration services – the sequestration value of mangrove forests alone, which comprise a fraction of the total PBPA vegetation, was recently estimated to be USD \$45 million per year. The area's shoreline features sea grass beds and coral reefs that provide protection from storm surges, hurricanes, flooding and beach erosion. The Goat Islands area is a major nursery and critical habitat area for numerous marine species important in commercial fisheries, including snapper, grunt, lobster, shrimp, and oysters. This area has potential for an increase in sustainable tourism, particularly because of its proximity to Kingston.

The government of Jamaica has long recognized this ecosystem's value by legally declaring the area protected and establishing forest reserves, game and fish sanctuaries. As a Party to the



Convention on Biological Diversity (CBD), the continuance of such actions is critical to Jamaica achieving its commitments outlined in the Strategic Plan on Biodiversity and its accompanying Aichi Biodiversity Targets. The PBPA has been recognized as a Key Biodiversity Area (by the Critical Ecosystems Partnership Fund), an Important Bird Area (by BirdLife International), an Alliance for Zero Extinction site, and a Wetlands of International Importance (identified by the Ramsar Convention). Such designations have attracted much investment from the international conservation and donor communities. We are also aware that government agencies have worked extensively to prepare materials to establish the PBPA as a UNESCO Biosphere Reserve. With this in mind, IUCN respectfully asks that the decisions you make regarding the PBPA are in accord with the commitments that Jamaica has already made to safeguard and restore its biodiversity for the long-term benefit of present and future generations.

IUCN agrees strongly with the collective knowledge of government and non-government stakeholders that the PBPA should not be developed in a way that is environmentally harmful and unsustainable. There should be a balance between protecting ecosystems and livelihoods, and creating new sources of income. We wish to encourage the Government of Jamaica to pay close attention to this issue and to carry out a thorough and transparent Strategic Environmental Assessment (SEA), including an environmental and socio-economic cost-benefit analysis of the options for other locations for the port. We fear that not doing so sets a very dangerous precedent for all protected areas of Jamaica. Should the government of Jamaica decide to move forward with this proposal once the results of the SEA are published, we would strongly encourage in-depth discussions between all of the area's managers and policy makers prior to development proceeding in order to jointly plan, mitigate and minimize adverse environmental effects.

IUCN, SSC, and particularly the expertise contained within the SSC Iguana Specialist Group, and other appropriate Specialist Groups, stand ready to provide advice and technical assistance on this issue as needed.

Yours sincerely and respectfully,

Julia Marton-Lefèvre Director General

IUCN, International Union for Conservation of Nature

Simon N. Stuart

Chair

IUCN Species Survival Commission

Copies to:

Prime Minister of Jamaica, the Most Honourable Portia Simpson Miller M.P Office of the Prime Minister, 1 Devon Road, Kingston 10, Jamaica

Minister of Transport, Works, and Housing, Dr. the Hon. Omar Davies Ministry of Transport, Works and Housing, 138h Maxfield Avenue, Kingston 10, Jamaica

Minister of Youth and Culture, Hon. Lisa Hanna Ministry of Youth and Culture, 4-6 Trafalgar Road, Kingston 10, Jamaica

APPENDIX

Some rare, threatened, or endangered animals and plants found in the PBPA • Portland Ridge Frog, Eleutherodactylus cavernicola • Portland Ridge Trope (Thunder Snake), Trophidophis stullae • Jamaican Brown Trope (Thunder Snake), Trophidophis jamaicensis • Jamaican Brown Trope (Thunder Snake), Trophidophis jamaicensis • Blue-Tailed Galliwasp, Celestus duquesneyi • Jamaican Iguana, Cyclura collei • Jamaican Skink, Spondylurus fulgidus • Bahama Mockingbird, Mimus gundlachii hillii • Parker's Polly Lizard, Sphaerodactylus parkeri
 Portland Ridge Trope (Thunder Snake), Trophidophis stullae Jamaican Brown Trope (Thunder Snake),
 Jamaican Boa, Epicrates subflavus Jamaican Blindsnake, Typhlops jamaicencis Malpighia proctorii West Indian Mahogany, Swietenia mahagoni Lignum Vitae, Guaiacum officinale Grey Birch, Bursera hollickii

Year	Type of Area	Organisation	Name of Area	Rationale / Purpose for Designation
2006	Wetlands of International Importance	Ramsar Convention	Portland Bight Wetlands and Cays	Internationally important for conservation of biological diversity, particularly waterfowl. To promote conservation of habitat (spawning ground, nursery, and/or migration path on which fish stocks depend).
2009	Important Bird Area	BirdLife International	Portland Bight IBA	Areas of habitat for globally threatened birds, thus priority conservation areas.
2010	Alliance for Zero Extinction site	Alliance for Zero Extinction	Hellshire Hills	Survival of globally threatened species, especially the Jamaican Iguana.
2011	Key Biodiversity Areas in the Caribbean Islands Biodiversity Hotspot	Critical Ecosystems Partnership Fund	Braziletto Mountains, Portland Ridge and Bight, Hellshire Hills	Areas where globally threatened species of wildlife occur, as defined by IUCN. Conservation strategy is to integrate biodiversity conservation into landscape and development planning and implementation.
2012	Biosphere Reserve (conditional approval)	United Nations Educational, Scientific, and Cultural Organization (UNESCO)	Portland Bight Biosphere Reserve	To conserve biodiversity in terrestrial and coastal ecosystems while allowing sustainable use.