



March 9, 2022

Honorable Juan Antonio Briceno
Prime Minister
Government of Belize

2937 SW 27th Avenue
Suite 203
Miami, FL 33133

Dear Honorable Briceno:

Bonefish & Tarpon Trust (BTT), along with the flats fishing community of Belize, strongly opposes the proposed development by Deadman Caye Group Resort in Turneffe.

BTT is an international, science-based, non-profit organization dedicated to the conservation of bonefish, tarpon, and permit—the species, their habitats, and the larger fisheries they comprise throughout the United States, Gulf of Mexico, and Caribbean Sea. Belize is a critically important part of the flats fishery in this hemisphere and, as such, has been the subject of BTT's research and conservation efforts for more than 12 years. This includes specific studies conducted at the site now targeted for development as well as economic impact assessments of the value of flats fishing to Belize.

Turneffe Atoll is an iconic fishing destination for visiting anglers. The area provides critical habitat for bonefish and permit and is one of the most productive flats fisheries in the world for these species. In addition to its environmental importance, the Turneffe Atoll flats fishery is a significant economic driver for the country, contributing more than BZ \$112 million to the Belizean economy annually and supporting 2,100 individual jobs in the country, including Belizean guides.

We strongly oppose this project due to the irreversible environmental damage to water quality and habitats it would cause. The potential damage includes the significant loss of red mangroves and seagrasses that are critical fish habitat as well as detrimental impacts to economically important fish species. The project site is just meters away from coral reefs, one of the most diverse ecosystems in the world. These reefs are currently threatened by climate change and disease – additional environmental stress brought on by human activities will exacerbate these threats, resulting in devastating effects on corals.

These concerns expressed by BTT and the fly fishing community have been previously acknowledged and codified, and they should not be set aside at this time. For example, the proposed development is in direct conflict with the "Turneffe Islands Development Guidelines" (2003) and the "Turneffe Atoll Coastal Zone Management Guidelines" (2011), which both state that "over the water closed structures should not be allowed" on the Atoll due to concerns over public access, habitat destruction, and wastewater pollution. Allowing such projects contravenes conservation and good governance of marine resources, protected areas and

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regulations stipulated for biological, ecological, social and economic sustainability in Turneffe Atoll Marine Reserve (TAMR) and also that of the entire country for whose benefit the Belizean government manages the TAMR.

We also have significant concerns about the Environmental Impacts Assessment (EIA) being prepared for MDL Investment LTD by Tunich-Nah Consultants & Engineering (TNCE). The methodologies being used to prepare the EIA are inappropriate to assess the ecological, social, and economic impacts of the project. Hence, any information produced by the EIA will not accurately reflect the real and significant impacts of the project, making proper evaluation of the development challenging.

BTT, along with the local and international flats fishing community at TAMR, urges you to reject the project by Deadman Caye Group Resort-Turneffe in the TAMR, using all of the science, guidelines, tools, and regulations developed over time through collaboration with fisheries and tourism stakeholders, the science community, and government. Do not put perceived short-term economic gains above the long-term benefits of thriving ecosystems that support sustainable fisheries and healthy coastal communities.

Our science has long recognized that only healthy habitats will sustain healthy fisheries and bring significant and lasting economic benefits, both locally and internationally.

Sincerely,



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