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Maria Rivera,
Senior Adviser (Americas),
Ramsar Secretariat,
Rue Mauverney 28, CH-1196,
Gland, Switzerland (rivera@ramsar.org)

Re: Changed Boundaries of Ramsar Wetland in Levera to accommodate Mega-Resort development in Grenada

Dear Ms. Rivera,

Through the Physical Planning and Development Control Authority, Grenada Land Actors (GLA) recently received a copy of the Environmental and Social Impact Assessment (ESIA) that was conducted for the Grenada National Resort – an 18-storey mega resort (3 towers) with a casino and an 18-hole golf course. According to this document, the “official” boundary lines for the Ramsar-protected wetland were changed through discussions with the Ministry of Agriculture and Lands and the Developer, Singapore Heng Sheng (Grenada) Development Pte. Ltd. In the ESIA, a new “official” map is presented, differing greatly from the original Ramsar map that can still be found on the Ramsar convention website. The ESIA also refers to an MoU that was signed by the Government and the Developer; however, the agreement presented in the Annex of the ESIA, is partly written in Chinese, has no names attached, has no signatures appended, includes no conditions, and does not appear to be a legally binding instrument in any way. The new boundary delineation would leave half of the Levera beach unprotected, a beach which hosts one of the largest turtle nesting populations in the Caribbean.

At the recent public consultation held by the Developers (11th February 2023), the Developers were questioned about this MoU and the attempt to change the boundary. The ESIA consultant, Niles and Associates, was not forthcoming in their response. The consultant indicated that they were not responsible for the changes and that these new



boundary coordinates had come from the Ministry of Agriculture and Lands. The ESIA consultant also suggested that the previous boundaries of the Ramsar site were nothing more than an “imaginary line on paper”.

Levera was designated a Ramsar site after years of dedicated hard work by the then staff of the Forestry Division, who recognised the importance of the wetlands to the resilience of Grenada – long before the threat of climate change became a focus. Grenada’s Integrated Coastal Zone Management Policy of 2015 clearly states that, “the country has already experienced significant losses of infrastructure and coastal resources due to sea level rise, elevated sea surface temperatures and increasing intensity of storms and hurricanes To reverse this trend, there must be an immediate national response of adaptation so as to improve and increase the resilience of key marine ecosystems and also to ensure that habitats and species are preserved”. Thus, the loss of the Levera wetland, one of the largest on the island, will only worsen Grenada’s climate resilience and significantly lower the availability of habitat for waterfowl (a key consideration under the Convention). GLA would like to draw your attention to the third statement of the Convention¹, which echoes the thinking of our organization in that “...wetlands constitute a resource of great economic, cultural, scientific, and recreational value, the loss of which would be irreparable” - and there is no other wetland in Grenada like Levera.

We do not believe that the Government has followed any of the correct protocols to change the boundaries for this Ramsar-designated wetland to facilitate the Grenada National Resort, as none of the criteria for “urgent national interest” applies. In November of 2002, the Contracting Parties released [guidance](#) for interpreting “urgent national interests”. This billion dollar hotel development is a threat to Grenada’s wetland integrity, and any proposed changes do not account for the criteria listed by the

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1. RECOGNIZES the interdependence of Man and his environment;
 2. CONSIDERS the fundamental ecological functions of wetlands as regulators of water regimes and as habitats supporting a characteristic flora and fauna, especially waterfowl;
 3. BEING CONVINCED that wetlands constitute a resource of great economic, cultural, scientific, and recreational value, the loss of which would be irreparable;
 4. DESIRING to stem the progressive encroachment on and loss of wetlands now and in the future;
 5. RECOGNIZING that waterfowl in their seasonal migrations may transcend frontiers and so should be regarded as an international resource;
 6. BEING CONFIDENT that the conservation of wetlands and their flora and fauna can be ensured by combining far-sighted national policies with coordinated international action.



Convention, which includes valuing the existing functions and economic, social and ecological values of the site in question; the value of habitats harbouring endemic, threatened, rare, vulnerable or endangered species; and transboundary effects, which in the case of Levera would encompass effects on migratory birds and sea turtles.

Besides being done in consultation with all stakeholders, which we believe should include NGOs, CSOs and the wider public, a restructuring of the boundaries should start with a “prior environmental assessment, taking into consideration the full range of functions, services, and benefits offered by the wetland” which also proposes “mitigation or compensatory measures” under Article 4.2. Next, Parties should assess when “there are threats of serious or irreversible damage” and should not postpone “cost-effective measures to prevent environmental degradation”. If these conditions are met, the Party is to notify the Bureau and can seek advice from the Scientific Panel before there is irreversible damage to the wetland.

GLA reiterates that there is no other wetland in Grenada like Levera. The numerous [negative impacts we anticipate](#) from this project on waterfowl and other species warrant notifying the Bureau that there will be a significant reduction in ecological integrity due to human interference (Article 3.2). We do not believe that it is possible to create additional reserves in the area or elsewhere in Grenada, or that it will be possible to avoid the deleterious impacts of the development nearby. Therefore, the compensatory mechanism of the Convention cannot be fulfilled.

GLA would like to request from the Secretariat confirmation of any of the above information being transmitted from the Government of Grenada to the Bureau within the last three years. GLA also requests that the Ramsar Secretariat share all relevant submitted documents pertaining to the boundaries of the Ramsar Levera site. This would include any GIS data and high-resolution maps that clearly delineate the features and ecosystems which the site encompasses. We also request access to a higher resolution version of the map currently on the Ramsar RSIS website, with the filename GD2034map2012.pdf.

Yours sincerely,

W. Valentine Douglas,
President,
Grenada Land Actors



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