



**Comments on:
Draft Great Goat Island Management Plan (2019 – 2024)**

Done by:

The National Environment and Planning Agency (NEPA)

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This document contains the professional opinion of the Jamaica Environment Trust (JET). In arriving at our opinion we made every reasonable attempt to ensure that our resource persons are informed and reliable and experts in the area in which their comment and analysis is sought. JET encourages readers to apply their own critical analysis to the information provided in this document and by others, particularly where JET's opinion differs from those others.

At the request of the National Environment and Planning Agency (NEPA), the Jamaica Environment Trust (JET) has reviewed the Draft Great Goat Island (GGI) Management Plan (2019 – 2024). Of note, JET has also been included in stakeholder consultation meetings towards the development of the plan, a process being led by NEPA and Urban Development Corporation (UDC), who co-manage the Goat Islands. JET wishes to raise the following concerns:

Legal Protection

JET is gravely concerned that the Great Goat Island (GGI) Management Plan is being developed in the absence of a defined approach to its legal protection.

While we understand and acknowledge that the Goat Islands are a part of the Portland Bight Protected Area (PBPA) and therefore they should be afforded an equivalent level of protection, the terms "wildlife sanctuary" and "wildlife reserve" have frequently been used by the Government of Jamaica (GOJ) and its agencies to describe an added layer of legal protection being applied to Goat Islands. Furthermore, in a letter to JET dated December 13, 2017 CEO of NEPA, Peter Knight confirmed the September 2017 decision of the management authority, the UDC, to declare Goat Islands a wildlife sanctuary; this is also referred to on pages 31-32 of the GGI Management Plan:

“In the following year, 2017, the UDC agreed to manage the GGI as a wildlife sanctuary to be co-managed with the NEPA to facilitate the reintroduction of threatened endemic species, including the Jamaican Iguana (*Cyclura collei*)”

The term "wildlife sanctuary" does not exist in Jamaican law, but it is NEPA's responsibility to make such designation where it does not exist, or to determine its appropriate designation under existing law, in order to protect Goat Islands.

The management plan is extremely lacking in its description of how Goat Islands will be given this additional layer of protection under Jamaican law. The zoning plan as described will not offer the required level of legal protection for Goat Islands. It is JET's recommendation that Goat Islands should be protected by an order under the Natural Resources Conservation Authority (NRCA) Act.

Zoning Action Plan

The Zoning Action Plan as proposed in the GGI Management Plan is extremely vague, and no timeline for implementation of the final zoning plan has been included. In the absence of an approved zoning plan, there will be almost no protection for the area.

Finalizing the zoning plan should be fast-tracked by NEPA and UDC, and timelines should be immediately established for putting the necessary protective management strategies in place. Once developed the zoning plan should:

- 1. Specify clearly which activities are allowed and restricted in each zone of the Goat Islands. Ambiguity is time- and resource-consuming and decreases the likelihood for successful protection.**
- 2. Prohibit activities that are guaranteed to remove or disturb the Goat Islands Biodiversity and Cultural Heritage for more successful protection.**

3. Enforced as soon as possible, so that the Goat Islands can be managed as prescribed.

Separation of Great and Little Goat Islands

It is unclear as to the reason why Little Goat Island has, for the most part, been excluded from the management plan. Although Little Goat Island (LGI) is referred to several times in the description of the Goat Islands in Section 1 of the GGI Management Plan, Section 2 of the plan, which outlines the various management objectives and strategies to be pursued, makes little reference to LGI.

As the Management Plan aptly states on page 14: “GGI and LGI, are separated by a thicket of predominantly red mangroves”. **On-the-ground, Great and Little Goat Islands are barely distinct from each other, therefore any plan for the area should include management strategies and appropriate zoning for both land masses to ensure adequate protection.**

Infrastructure Management Programme

JET is also concerned about the GGI Management Plan’s Infrastructure Programme Action Plan as outlined on pages 47 and 48, page 47 states:

“There are also no existing amenities on the site and as such basic amenities will need to be provided for future staff and visitors to the site. Necessary amenities will include living and working spaces for conservation staff and rangers, research labs and an interpretive centre for visitors...”

It is our understanding, from our review of the plan and subsequent discussions at the most recent GGI NEPA/UDC consultation meeting (January 24, 2019), that the infrastructure described, including basic utilities, are being proposed for GGI.

JET is of the position that GGI should be left as a conservation zone/area, with little human interference. The type of infrastructure described in the plan is better suited for LGI, where there are already human structures present. Infrastructure on GGI should be limited to a landing area for small boats, to facilitate access for staff and scientists conducting research only.

Other Issues

It is disappointing that the Management Plan in its current form, is primarily a description of several Management Programmes for GGI, each with plans that are in an unknown stage of development. For example, JET notes that the GGI Biodiversity Conservation Programme is to include a Restoration Plan, Eradication Plan and Introduction/Reintroduction Plan for GGI, none of which have been presented. There is also reference to a Zoning Plan, Cultural Conservation Plan, Operational Plan, Sustainable Financing Plan, Infrastructure Plan, Emergency Plan, and Stakeholder Engagement Plan.

The GGI Management Plan is in essence “a plan of plans” with little detail and lacking any substantial information on the GOJ’s intended strategies for the protection of GGI, how the various management programmes will be implemented or their associated timelines. Significantly more detail on the intended strategies for each sub-plan and programme **must** be included in subsequent drafts of the Management Plan.

JET also notes that NEPA/UDC has seen fit to include over 10 sub-plans in the management plan, but none of these include a Patrolling/Enforcement Plan. Patrolling and Enforcement are two very critical aspects of protected area management, requiring careful consideration and a detailed strategy for implementation. A plan for Enforcement of the Goat Islands Wildlife Sanctuary is needed.

Finally, the absence of a draft budget for the management plan at this stage is a point for serious concern. **The Goat Islands Management Plan will not be successful unless sufficient capital resources are allocated to each programme.** A budget for all programmes is urgently needed and should be reflect the real cost of implementation.

Jamaica Environment Trust
1 February 2018