



28 October 2020

The Most Honourable Dr. Hubert Minnis
Prime Minister of The Bahamas
Office of the Prime Minister
Sir Cecil Wallace Whitfield Centre
PO Box CB 10980
Nassau, N.P., The Bahamas
primeminister@bahamas.gov.bs

CC: Local Bahamas Media

Dear Prime Minister Minnis,

We respectfully write to you today as a follow up to a letter addressed to you on behalf of the [Our Islands, Our Future Coalition](#) from Bahamas Reef Environment Educational Foundation ("BREEF") and Waterkeepers Bahamas ("WKB") dated 2 July 2020, where we expressed our vigorous opposition to the planned offshore oil drilling and exploration in Bahamian waters and strongly urged that you move immediately to cancel all existing licences, reject all proposed renewals and impose a permanent ban on fossil fuel exploration anywhere within our maritime borders ("the July letter").

In the July letter, BREEF and WKB also mentioned growing support from Bahamians of all walks of life in the form of a grassroots coalition opposing offshore oil drilling in our waters. Since then the Our Islands, Our Future coalition has grown immensely, due to the grave concern that many have for protecting The Bahamas and its economy from a crude oil disaster. More than 40,000 people have signed the Our Islands, Our Future coalition's online petition to you. We are enclosing a document with those names. The Our Islands, Our Future coalition now has over 50 named supporters, including Bahamian and international NGOs and businesses, and we are growing by the day.

The Our Islands, Our Future coalition wants to provide you with important and relevant information so that your government is in a position to make the best decision for the future of The Bahamas and its coastal economy, which generates

\$7,696,200,000 and supports 122,257 jobs¹. We also want to highlight the fact that Bahamas Petroleum Company (BPC) in their Environmental Impact Assessment (EIA) and their Environmental Management Plan (EMP), are essentially “snowing” the government and The Bahamian people with gobs of meaningless information to make us think they have done their homework and have our best interest at heart. They have not, and they do not. These EIA and EMP documents are not complete, they are out of date even by the company’s own announced plans, and they would not pass any level of scrutiny under international standards. BPC is not mitigating their risk, they are not adequately protecting us from an oil disaster, nor are they prepared to respond to one.

Analysis and reports by two highly qualified experts are attached to this letter. These analyses include relevant points which are clearly enough to guide you in making a decision to immediately cancel all existing licenses.

In a detailed analysis of the EIA and EMP by Dr. William J. Rogers, the many deficiencies exposed include, but are not limited to the following concerns²:

1. **Lack of cumulative impact analysis** - This is a basic component of any Environmental Impact Assessment. Lacking a cumulative impact analysis is often referred to as the “one-free-bite approach.” If an EIA only analyzes a single project in isolation, it fails to consider or disclose the magnitude of cumulative impacts, which can be severe. In this case the EIA is at times referring to a single exploratory well, and at times a series of three exploratory wells, but it completely fails to show how it relates to a full drilling program that includes production and pumping of oil at multiple locations, as well as storage and transfer of crude oil from producing wells.
2. **Lack of mitigation of toxic discharges** - The EIA and EMP have not addressed the toxicological lethal and sub-lethal impacts of the over 80 tons (240 tons if three wells are drilled) of barite and heavy metals in water-based drilling mud and cuttings that will be discharged to the sea floor.
3. **Lack of an adequate Spill Response Plan** - Essentially, the BPC response strategy to a major spill is one of (1) monitoring, (2) use of dispersants and (3) beach cleanup. The types of dispersants to be used have not been identified so that a toxicological evaluation can be conducted. The negative

¹ The Value of the Coastal Economy in The Bahamas at Risk from Offshore Oil Drilling: An Economic Analysis, Anthony Rogers, Sea Change Economics, LLC, August 2020.

² Technical Review of: Environmental Impact Assessment for Exploratory Drilling in the Cooper Block, Offshore The Bahamas, and Perseverance Well Exploration Drilling Program Environmental Management Plan, Prepared by: Dr. William J. Rogers Omega EnviroSolutions, Inc., October 12, 2020.

effects of dispersant use have not been discussed even though the EMP states that they may not be appropriate in some cases. This is not acceptable considering the sensitivity and uniqueness of the potentially impacted habitats and natural resources. There are no plans for oil recovery using oil skimming equipment, nor to utilize oil booming to protect sensitive areas in the event of a spill.

4. **There is no discussion on the Incident Command structure** other than the first command on the drill rig. There needs to be a clear process for initial command and then hand-offs in the event of a large spill. This is not addressed in the EIA or EMP. There is no discussion on how a spill with multi-international implications would be managed or who would assume “command” in such an event. BPC has not addressed the response capacities of The Bahamas, Cuba or the exposed parts of the US coastline, nor identified the need for any capacity building in these areas.
5. **No discussion of protecting vulnerable, threatened or endangered species, or unique and vulnerable areas.** The EIA and EMP fail to identify irreplaceable unique and sensitive areas, which oil fate and transport modeling has shown will reach The Bahamas, Cuba and the US under realistic unplanned events (blowouts and spills). There is no discussion of protective booming of sensitive areas or how entities managing those resources would be involved in the response. The EIA and EMP have not addressed the small spill and catastrophic oil spill reproductive effects of surface oil on breeding birds (oiling) and the potential impacts of oil inhalation by surfacing sea mammals, many of which are endangered, threatened or vulnerable.

In addition, the design of the proposed BPC well does not demonstrate compliance with international best practice for subsea blowout preventers. This is especially relevant because it was a failure of the blowout preventer while attempting to cap the Deepwater Horizon well, also an exploratory well, that resulted in the \$65 billion BP Gulf of Mexico disaster.

We respectfully call on you and your government to take a thorough review of this information.

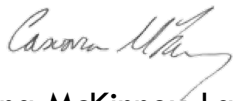
We cannot afford to put our nation’s future at risk, nor risk our invaluable tourism reputation if we are tied to a devastating accident. Your timely decision to stop drilling, along with the voices of over 40,000 individuals from The Bahamas and all over the world who have already signed [our petition](#), will send a clear message that we highly value and intend to protect the essential biodiversity that exists in The Bahamas, which supports our livelihoods and contributes significantly to our Gross Domestic Product.

Beyond the imminent risk of toxic discharges and oil spills, our nation is unfortunately already one of the “first and worst” hit by the increasing impacts of global climate change. We are already and will continue to experience heightening effects of sea level rise, ocean acidification and catastrophic storms of intensifying magnitude. How will we call on others to do their part to protect our atmosphere and oceans that we rely on if we simultaneously approve drilling for oil in our waters?

We wish to remind you of your powerful words about climate change directed to the United Nations where you said “The Bahamas fully supports the Secretary General’s comprehensive strategy to address a global emergency, which will eventually devastate the entire planet. The small island countries in the Caribbean, in the Atlantic, in the Pacific, and in the Indian Ocean and around the world, are on the frontlines of being swallowed into an abyss, created by human activity and increasingly by inaction. Our vulnerabilities as states on the frontline are profound.

In summary, we respectfully urge you to invoke your authority to make an urgent decision to cancel existing licenses immediately, disregard any license renewal proposals and place a permanent ban on offshore oil drilling in The Bahamas. Let us be known for pristine waterways and our commitment to a sustainable economy, not dirty fossil fuels or another uncontrolled and costly oil disaster.

Yours Respectfully,
OUR ISLANDS, OUR FUTURE
Steering Committee Members:



Casuarina McKinney-Lambert
BREEF



Rashema Ingraham
Waterkeepers Bahamas

Enclosures: Online Petition and Signatures
Technical Report
Financial Risk Assessment Report