



**MINISTRY OF AGRICULTURE, CLIMATE CHANGE & ENVIRONMENT
ENVIRONMENTAL ASSESSMENT AND PERMITS SECTION (E.A.P.S)
SCOPING VERIFICATION FORM**

PROJECT TITLE: Assomption Island Tourism Development

EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437

LOCATION: Assomption Island

ISSUES DISCUSSED

(Please use additional sheets if required - a separate sheet is to be used for each organisation/person undergoing scoping)

Following the scoping meeting held on Saturday 9th March and the introduction to the project provided by the developers, the Marine Conservation Society Seychelles has a number of reservations concerning the development, which we do not believe have been adequately addressed.

Firstly, we would like to question the appointment of ICS as the EIA consultants for this project. While we have no issue with ICS' ability to undertake the consultancy, we believe that the consultants responsible for conducting the EIA should be independent. As ICS is responsible for the management of conservation activities in the outer islands, in collaboration with IDC, their appointment represents a conflict of interest.

Regarding the issue of fishing in the designated zone 1, which following the decision of the SMSP Executive Committee, will now be allowed for 'subsistence', there are concerns regarding how this will be policed. Again in relation to the zone 1 designation of the waters surrounding Assomption, MCSS would like to receive confirmation that no sport fishing activities (catch and release or otherwise) will be offered to hotel guests.

In relation to the plans for the resort, the decision to construct stables and import horses is a concern. Seychelles has a long record of removing introduced and invasive species from its islands and to import horses does not align with sustainable tourism or biosecurity strategies. Horses are well known to host a diversity of parasitic fauna, which can transmit easily to native fauna. Additionally, what provision will be in place for the welfare of the horses? There are currently no veterinarian services in Seychelles with x-ray facilities and any injuries sustained by horses on the island could prove to be fatal.

In presenting the development at the scoping meeting, it was made clear that IDC will be the entity responsible for providing electricity, water and sewerage services. Will there be a separate EIA process for the construction of the infrastructure relating to these services?

With regards to the location of the villas, MCSS has concerns about their proximity to and impact upon Assomption's dune systems, which are unique to Seychelles. Will resort guests have access to these dunes and what measures are being implemented to avoid future damage?

Finally, while the plans for the property were outlined in the map shown at the meeting, it was not clear whether landscaping of vegetation in the surrounding areas was included within the footprint. What percentage of the island will the property cover when landscaping, roads and pathways are all taken into consideration? For the landscaping, there is a tendency for resorts to utilise ornamental plants that are visually appealing, rather than native species, which often play a crucial role in supporting local wildlife. It was also unclear what types of vegetation will be used in the landscaping process?

Thank you for taking the above concerns into consideration.



PERSON/ORGANISATION SCOPED

Name: Christophe Mason-Parker **Post Title:** Chief Executive Officer

Organisation: Marine Conservation Society Seychelles

Phone Number: 4248356 **Mobile Number:** 2575770

Email Address: mcssoffice@gmail.com

Sign: _____



Date 18/03/2024

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DEADLINE: 19th March 2024



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ENVIRONMENTAL ASSESSMENT AND PERMITS SECTION (E.A.P.S)
SCOPING VERIFICATION FORM

PROJECT TITLE: Assumption Island Tourism Development

EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437

LOCATION: Assumption Island

ISSUES DISCUSSED

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Dear Sir /Madame ,

Please see below points of concern for the hotel on assumption .

- There will be 12 horses on assumption ,has any assessment been done on the impact of introducing a foreign animal in a foreign habit have on the horses themselves and the tortoises that roams freely .
Is there any illness horses can carry and pass on to those around them .
Is there any chance that you these horses may have an effect on birds /any animals that migrate close to assumption or aldabra .

Has an assessment been done to view whether having chalets close to the beach will disrupt the tortoise and green turtles pattern?

Has any assessment been done on whether an increase in human activities on the island will not disrupt the laying of egg by the turtles?

Is there any containment plan if a disaster happens being that assumption is the closest to aldabra .

What is the plan in regards to foreign invasive species guest might bring intentionally or unintentionally given that they can fly directly to assumption

We do not need another new hotel especially not that far out considering new hotels was just open on an other island (Astoria)

PERSON/ORGANISATION SCOPED

Name: Daria Alphonse Post Title: _____

Organisation: _____

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Sign: _____ Date 18/03/2024

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1. Horses should not be introduced, as they will play havoc on our beaches and disturb the nesting turtles, not to mention the land tortoises..
2. The owners/developers should build, fund and maintain a coastguard base, so as to patrol the waters to keep away would be poachers on the other 3 islands in the Aldabra group.



PERSON/ORGANISATION SCOPED

Name: sabiana mancienne **Post Title:** _____

Organisation: _____
environmentalist

Phone Number: _____ Mobile Number:
2563015

Email Address:
sab60man@gmail.com

Sign: _____ S.M _____ Date ____ 18 03
2024 _____

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My objections to the proposed development on Assomption are as follows:

My main wish is that the project be cancelled, but from the speakers at the meeting, it is clear that the project has already had the unofficial green light from the Government. So, my objections are:

The size of the Development proposed... why not cut the project in half and build 20 chalets instead of 40? It is not as if the Developers need to get a return on their investment... after all, being allowed to build a tourism establishment on Assomption **IS IN ITSELF A HUGE PRIVILEGE**.... which no amount of money can ever hope to indemnify the Seychelles for.

Notwithstanding the fact that Assomption is bigger than La Digue and the population of the latter is much greater than that proposed for Assomption...

The horses and stables should be scrapped completely. Aldabra is a mere 21 miles away and there is a substantial body of research which has demonstrated that air-borne pathogens can travel thousands of miles across oceans and land... so what will a mere 21 miles create as protection?

I can provide journal references if necessary.

I am concerned at the disposal of human effluent and waste on the island and not satisfied at the statement by Mr Savy that the waste, after treatment, is good enough to drink. It will not be drunk. The island has fragile ecosystem used to coping with x litres of water per annum, the major influx of extra litres/gallons of 'fresh' water on both the land 'beach wells'? and in the seas and reef area cannot NOT affect the biodiversity of these areas.

Part of the island, e.g. south of the airstrip, should be left untouched, as a pristine environment where only strictly controlled guided tours be allowed... maximum of one per day, for a maximum of 20 people.

IDC should ensure that the rules governing exploration and use of the island and its beaches be signed off by each person visiting, with a clear system of penalties. These should not be monetary but involve being shipped off the island.



PERSON/ORGANISATION SCOPED

Name: Michelle de Lacoudraye-Harter Post Title: _____

Organisation: Private Citizen of
Seychelles

Phone Number _____ Mobile Number: +248 2519238

Email Address:
dlhmichelle23i@gmail.com

Sign: Michelle de Lacoudraye-Harter Date 18th March 2024

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ISSUES DISCUSSED

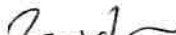
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1. Fishing Restrictions: Assomption is in ZONE 1 Aldabra Group of the Marine Spatial Plan which is a Marine National Park (High Biodiversity Area, no-take zone for commercial fishing) which conflicts with the proposed hotel's fishing activities for guests, potentially harming marine life protected for decades on Aldabra and Assomption.
2. Invasive Species Threat: Non-native species pose a serious risk to Aldabra and Assomption's delicate ecosystems, particularly concerning insects and plants transported via building materials. Current plans lack effective control measures. Species of insect and plant can be dispersed from Assomption to Aldabra.
3. Impact on Protected Species: Assomption hosts numerous protected species, whose habitats could be destroyed during construction, jeopardizing their survival. Turtles will be severely impacted.
4. Threat to Turtle Nesting Sites: The proposed hotel development encroaches on all of Assomption's prime turtle nesting beach, extremely likely disrupting nesting patterns despite assurances of low lighting. The only light turtles like is moon light!
5. Villas' Beach Proximity: Villas extend near the dunes, potentially altering beach dynamics and endangering turtle nesting sites.
6. Biosecurity Risks: The international airport on Assomption raises concerns about the unrestricted importation of prohibited items, posing threats to local flora and fauna where poaching is already a concern.
7. Uncertainty Regarding Surveillance: Limited oversight raises concerns about unauthorized activities, such as visiting protected areas like Aldabra without the correct permissions.
8. Environmental Impact pest control: Guests in hotels do not like Mosquito or biting insects. Mosquito control measures will harm local wildlife and pollute surrounding waters, particularly concerning fogging methods.
9. Litter Pollution: Increased tourism could lead to litter accumulation, exacerbating environmental degradation and harming marine life. Waste management for 500 staff in such a critically important location was not presented in a way that showed and great thought had been made towards this issue.
10. Preservation Concerns: The proposed development poses risks to Aldabra's protection status and Seychelles' environmental reputation, with alternative sites available for development.

When we claim 48% of the land of Seychelles is protected most of that 48% is Aldabra. Anything happens to Aldabra that percentage drops rapidly. Why risk it? Why Assomption? There are many other islands that they could choose that are not next to such an important atoll.

For the protection of Aldabra, and for the reputation of Seychelles as a custodian of one of the most amazing UNESCO World Heritage sites, this hotel development should not go ahead. Overall, the project's environmental impact raises significant conservation concerns and jeopardizes Seychelles' commitment to safeguarding its unique ecosystems.

PERSON/ORGANISATION SCOPED

Name: Rich Baxter Post Title: Project Director
Organisation: INDIAN OCEAN TORTOISE ALLIANCE (IOTA)
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Sign:  Date: 18/03/2024



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PROJECT TITLE: Assumption Island Tourism Development
EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437
LOCATION: Assumption Island

ISSUES DISCUSSED

(Please use additional sheets if required – a separate sheet is to be used for each organisation/person undergoing scoping)

To Whom It May Concern:

I write in my capacity as Chairman of the Indian Ocean Tortoise Alliance (IOTA), as well as a proud citizen of the Republic of Seychelles, to respectfully raise questions about the current plan for the transformation of Assumption Island and its potential impact on Aldabra — a UNESCO World Heritage Site — and the wider ecosystem of the Aldabra Group of islands. The Aldabra Group of islands constitutes one of our most precious national treasures in the Seychelles, and indeed a remarkable manifestation of humanity's common heritage. As you know full well, its survival against rather formidable odds has required extraordinary resources, advocacy, and determination. Far-reaching decisions, that carry with them the potential to disrupt and inflict irreversible harm to this truly invaluable place, therefore should warrant but the most extensive of analysis and scrutiny. However, it is my considered opinion that — as of now — the initiative to develop Assumption Island is moving forward at breathtaking speed, without having undergone the requisite review.

The questions I am raising in this particular matter are informed by decades of personal experience in creating and leading international nonprofits devoted to environmental protection and the effective preservation of imperiled biodiversity and cultural sites. As the founding Chairman of the Geneva-based multilateral foundation ALIPH (International Alliance for the Protection of Heritage in Conflict Areas) — the first mover in protecting endangered heritage in war zones — I have worked with a world-leading executive team and board of directors that includes representatives of the governments of France, the United Arab Emirates, the Kingdom of Saudi Arabia, the People's Republic of China, as well as UNESCO, to build a rapid reaction force which is now active in 35 countries with over 400 projects. For the past fifteen years, I have also served as Executive Chairman of Panthera — one of the most successful and impactful wildlife NGOs globally — dedicated to the protection of all 40 species of wild cats throughout their landscapes in 39 countries. These two entities devoted to the preservation of iconic, and yet at-risk, beauty have transformed from bold visions to organizational realities; each of them being regarded as the gold standard for professionalism and the effective execution of ambitious mission statements through the establishment of robust local, regional, and global partnerships.

It is in that very spirit that I co-founded and now co-chair the Indian Ocean Tortoise Alliance in order to activate — for the Seychelles — the considerable soft power of the Aldabra giant tortoise as *the* iconic and highly charismatic terrestrial megafauna of the Indian Ocean. Our team is now gearing up for a major campaign to implement our vision of not only assisting the Seychelles with the domestic challenges inherent to rewilding and habitat protection, but to do so across the vast expanse of the Indian Ocean — with the Seychelles representing the partnering standard bearer, as the indispensable protector of Aldabra. Our objective is ultimately to put a spotlight on the country as a best-in-class model and an inspiration to the broader region and the world in the masterful preservation of its extraordinary biodiversity.

As a matter of fact, the Seychelles has already made great strides in seizing the attention of the international community as a leader in environmental protection. The cause constitutes a most consequential, nation-defining agenda that is of inestimable value to this place that I have the honor of calling home. That is precisely why I am so concerned that the developments being proposed on Assumption Island are proceeding without the benefit of a thorough and professional undertaking to study key aspects of this project's impact on the Aldabra Group of islands and the surrounding marine ecosystem. In light of my longstanding experience in assessing and confronting threats to heritage and the environment, I am of the firm belief that the project could present a clear and present danger to the precious and fragile ecosystem of the island of Aldabra — not to mention Assumption itself. I am also deeply

troubled that the manner in which this specific project has progressed might pose significant global reputational risk for the Seychelles.

Having visited Assumption Island earlier this month, and observed firsthand the rush to development that is taking place there despite the absence of a fully transparent, best practice environmental impact assessment (EIA) that is a basic precondition to *any* major project — not to mention one adjoining a UNESCO World Heritage Site — I would strongly suggest considering a pause in further activities until the very serious challenges being brought by this project, as outlined below, can be duly assessed.

Among several other items worthy of analysis, the following ones would be particularly critical:

- Has a best-in-class, internationally-recognized firm (without any conflict of interest with the developer) been engaged to conduct a comprehensive and credible EIA? The answer appears to be no. The Seychelles cannot under any circumstances make the mistake of proceeding with this project without a robust EIA. Moving forward without one risks international scandal and could cost the Seychelles many times more in reputation and treasure than what little might be gained from this project;
- Has a credible and thorough scientific review by internationally-recognized authorities been conducted regarding how the Assumption Island development project will affect the pristine marine, coastal and terrestrial ecosystems of Aldabra atoll — a UNESCO World Heritage Site? Here, too, the answer appears to be no. This development threatens the biodiversity and ecological integrity of the wider constellation of the Greater Aldabra Group of islands and insufficient research has been performed to fully understand these profound linkages and how activities on neighboring islands could prove devastating to Aldabra;
- Can legal analysis be provided as to why this development, and the activities undertaken to construct and sustain it, would not violate the obligations of the Seychelles as a signatory to several international environmental conventions including, but not limited to:
 - Kunming-Montreal Global Biodiversity Framework (2022)
 - Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat (1971)
 - World Heritage Convention – UNESCO World Heritage Site (Criteria vii, ix, x) (1972)
 - Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention) (1979)
 - Indian Ocean Whale Sanctuary – International Whaling Commission (1979)
 - United Nations Convention on the Law of the Sea (1982)
 - Convention on Biological Diversity (1992)
 - International Coral Reef Initiative (1994)
- Assumption Island and the surrounding waters provide habitat to many protected species across marine life, birdlife and terrestrial life. Not only is the island home to the Aldabra Giant Tortoise — the country's iconic symbol and the champion of our organization — but it also represents an essential piece of land for migratory animals that rest and nest on Assumption. While the developer has indicated that only 1% of the island's area is currently dedicated to this project, it appears that the development will encumber approximately 85% of the island's beaches — a critical and irreplaceable habitat for sea turtle nesting — and furthermore that secondary impacts to the maritime ecosystem and wider environment have not been properly assessed. Can a thorough analysis be provided by a best-in-class, internationally-recognized firm on these crucial matters?
- What regulations will be put in place to prevent the introduction of invasive species and effectively manage the biosecurity threat to the Aldabra ecosystem from the new development on Assumption? How will they be enforced? The construction, the maintenance, and the movement of staff and visitors to the island once the project is operational pose a significant, and in fact inevitable, threat of invasive species introduction through land, sea, and even wind. The likelihood of lapses in biosecurity and intrusions onto Aldabra due to the developments on Assumption will increase exponentially as a major airport is brought into the equation and as access to the island's various coasts opens up to more lightly monitored visitors. Furthermore, this project threatens to *undo* the years of laborious and expensive eradication efforts that have been conducted on Aldabra.

These questions are not intended to serve as a comprehensive list of concerns, but only to underscore the breadth, depth, and sheer severity of the environmental and ecological implications of the Assumption Island development project — and to highlight the apparent absence to date of any kind of proper scientific review by internationally-recognized and accredited authorities.


We at IOTA look forward to participating in the deliberations regarding this project, which is so important to the nation and central to our work. We also trust that, as the custodians of this unique ecosystem — as well as the Seychelles' international standing — you will ensure that these discussions are conducted with the fullest transparency and utmost integrity. A mandate of such vital consequence indeed would require nothing short of that.

With very best wishes,



Dr. Thomas S. Kaplan

PERSON/ORGANISATION SCOPED

Name: Dr. Thomas S. Kaplan Post Title: Founder & Chairman
Organisation: INDIAN OCEAN TORTOISE ALLIANCE (IOTA)
Phone Number: 2456433 Mobile Number: _____
Email Address: info@iotaseychelles.org
Sign:  Date 18/03/2024

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LOCATION: Assomption Island

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1. **EIA consultancy.** Further to the role and responsibility of the EIA consultancy as raised at the public meeting of 9-03-24 it is essential for the EIA to treat both the natural environment (eco-system, bio-diversity etc..) and the cultural/historical heritage of the island in equal measure. In general, EIAs tend to give weight to impacts on the natural environment while issues of socio-cultural implications have tended to be given less importance although not totally ignored, perhaps as a result of poorer response in this area. Given the fact that Assomption has a significant **history and story**, which are important to the national **memory**, it follows that the EIA should provide for consideration of the island's natural as well as its historical and cultural heritage.

- Throughout a significant period of Seychelles history, namely the first half of the 20th century, the export of guano from Assomption was of significant importance to the Seychelles economy. On Assomption, this started in 1908 and went on until the 1980, with a 10 year break in the 1940's).
- During the first decades of the 20th century, another important economic activity on Assomption was **turtling**, for the production of **calipee** for export to UK, and the supply of live turtles, and **kitouz** to Mahé. (This started in 1908 and in fact it resulted by the late 1920's, in the collapse of the turtle population on both Assomption and Aldabra, where turtling was also a very lucrative activity. (Hornell, 1927.)
- Because of turtle fisheries and guano mining, at one time there was a labour force of over 400 inhabitants present on the island especially during the peak years of guano extraction. Given the rotation of the residential labour over so many years **thousands** of families throughout Seychelles were familiar with or had connections with the island or were dependent on the contract salary payments of labourers working on Assomption. The old cemeteries or the ruins of the workers quarters stand as reminders of the island's past.
- It should be noted that **the first village on the island** was established in the north of the island, not far from where the "Radar installation" is situated. This has a small cemetery, two very large water tanks (with dates inscribed) and the foundations of some huts. These are definitely worth preserving as they are part of that island's early economic history. (Pictures of water tanks and graves below.)
- Historic structures and ruins which are of heritage value are to be found in the area of the present village (which was started in 1917/18) as well as in the north. See previous point.
- It must be emphasised that Assomption, as was the case with other outer islands, was associated with the first local Seychellois entrepreneurs as well as the development of domestic shipping and navigation. Seychellois folklore still abound with the names of schooners and local skippers of involved in the significant traffic between Mahé and the Outer Islands such as Assomption.

The scale of the exploitation of guano and turtles on the island leave a dark side to its **story** but



it is of historic significance nonetheless.

2. Given its contribution to Seychelles early economic life and its historic association with hundreds of Seychellois up to the 1950's the preservation of the island's heritage and relics need particular attention in *its* future development.

3. While assurances were given in the EIA presentation of the planned development, the extent to which this is to be done needs to be fully clarified:

For example, how will the existing historic buildings and structures be enhanced/preserved in relation (or in the midst of) to the hotel's footprint? Should historic structures remain within the hotel development area (with the danger of being seen as spots of curiosity rather than clear parcels of heritage value?) Or should they remain, preserved and used where possible, within areas managed by IDC?

4. Buildings, structures and ruins that should be preserved :

- Ruins of workers residence (Close to present IDC Village)
- The Manager's House (before IDC)
- Old cemeteries:
 - (i) the small one in the north and



One of the graves (of a child, Mein) in the small cemetery, close to the first village (north)

- (ii) the main cemetery in front of village, close to the beach
- Part of guano sheds – existing coral walls
- Guano weight platforms
- **Water Reservoirs:**
 - (i) Large water reservoir with inscription of date of construction at the present village, close to the Guano shed
 - (ii) Two large water tanks up north, where the first village as set up (dates also inscribed thereon)



One of the *two* large water storage tanks, used by the inhabitants of the first Village



Plaque with the date of completion of the second water tank. 25th Feb 1910.

- (iii) The domestic rain water collection and storage reservoirs which are next to to the old Manager's house (part of IDC Village) See picture. There are very few of these left, either on Aldabra or Assomption.



- Set of buildings housing old post office, jailhouse (*Kaso*), clinic/hospital, chemical store etc (with construction dates clearly indicated. 1920's). Present IDC Village.



Part of the buildings built in the 1920's. Year of construction are inscribed over the doorways.

- Selected existing sections of old rail used in the transport of wagons of guano to the central depot

5. Given all the above it is in our view as representatives of an NGO that seeks the protection and enhancement of our ***built*** heritage, the preservation of the heritage of the island can benefit from the hotel project; this can best be achieved by a clear demarcation between the project and sites of heritage value.

Modern Developments:

6. **Guesthouse for Seychellois Visitors:** We cannot see where this is on the plan. All island resorts should have a guesthouse for Seychellois. An IDC principle.

7. Site of the Chinese Restaurant:

I certainly do not agree that this is the most appropriate site for a Chinese Restaurant.

This particular site is one of the few, on the eastern coast, that has not been transformed by human activity in the 20th century.

In fact, it still appears "wild". There is an interesting series of caves in the small "cliff" and here, there is clear evidence that Assomption is a "raised coral reef" island, which makes this area pretty unique for Seychelles. It is important that this part of the island **is not affected by any man-made structure**. (Other "raised reef" islands are few: St Pierre, Aldabra ...)



A Chinese restaurant on the bluff would be an insult to the beauty of that part of the island. Surely the restaurant (any restaurant really) can be placed somewhere inside the Coconut Grove, and not be visible from "the wild place." This really is NOT acceptable.



PERSON/ORGANISATION SCOPED

Name: Patrick Nanty Post Title: President

Organisation: Icomos Seychelles (Icomos : International Council of Monuments and Sites)

Phone Number: _____ Mobile Number: _____
2722026

Email Address: pnanty@hotmail.com

Sign:  Date 19 - 03 - 24

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The NGO, Sustainability for Seychelles (S4S) wishes to point out the following in relation to this project:

The construction of a high-end luxury resort of 40 units on Assumption Island, on two separate locations, once again, is in direct opposition to the principles of “sustainable development” – ie. “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”¹. We put forward this view for the following reasons:

1. The proposed hotel will carry a massive carbon footprint that future generations will have to be responsible for, in terms of:
 - (a) transport of all building materials from Mahe and other parts of the world;
 - (b) the transportation and accommodation of labour during the building phases, and staffing once completed;
 - (c) carbon emissions from numerous private jets and boats that will land on the island, bringing people and goods. Based on an occupancy rate of 100% and assuming the private jets will come from destinations five hours away from Assumption, the additional flights will increase the current annual CO2 emissions of Seychelles by an additional 25%.

There is also the issue of how the planes will refuel on Assumption. Information on this was not provided. Will there be a fuel depot on the island?

- (d) the range of imported food to satisfy the needs of five varied restaurants;
- (e) the amount and disposal of waste generated as a consequence of high-end luxury expectations;
- (f) the production of desalinated water using generators. Where will the desalination outfall pipe be located? What mitigating actions will be taken to minimise sea water temperature rise and increase in salinity which are direct consequences of the desalination process.
- (g) the introduction of horses onto the island and their maintenance will add to the number of introduced species and risks to biodiversity.

2. The proposed plans do not appear to take into consideration the issue of sea level rise, which is clearly taking place, as evidenced by all the coastal changes on all islands of Seychelles.

3. While it was agreed at the scoping public meeting of 9 March 2024 that the EIA process is flawed, the proponents of the project also did not provide full information that would assist the public in providing more balanced views of the project proposal, and promoting transparency; for example, how much is the lease amount to government? What does a "standard IDC lease agreement" look like? How does this project benefit the general population? Was there a tender process? Are the minutes of

¹ International Institute for Sustainable Development
<https://www.iisd.org>

the tender opening publicly available? How was the GICC company chosen for the construction? Have construction equipment been transported to the island already?

For the reasons stated above this organization wishes to propose that this proposed hotel project on Assumption island is reviewed and scaled down to ensure that it respects the sustainable development principles and practices that Seychelles is promoting nationally and internationally.

PERSON/ORGANISATION SCOPED

Name: Marie-Therese Purvis Post Title: Vice-chairperson

Organisation: Sustainability for Seychelles (S4S)

Phone Number: 4224072 Mobile Number: 2589001

Email Address: info@s4seychelles.com

Sign: _____



Date 19 March 2024

The completed form can be posted on the following e-mail address Class1@env.gov.sc; or contact the ENV ASSESSMENT AND PERMITS SECTION- Environment Department-Tel; 4670529 to organise for collection.

DEADLINE: 19th March 2024



MINISTRY OF AGRICULTURE, CLIMATE CHANGE & ENVIRONMENT
ENVIRONMENTAL ASSESSMENT AND PERMITS SECTION (E.A.P.S)
SCOPING VERIFICATION FORM



PROJECT TITLE: Assumption Island Tourism Development
EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437
LOCATION: Assumption Island

ISSUES DISCUSSED

(Please use additional sheets if required - a separate sheet is to be used for each organisation/person undergoing scoping)

Constructing a hotel on Assumption island would likely exacerbate several critical issues tied to human activities that have already impacted this unique ecosystem. From my past visit and observations, it's clear that the presence and actions of humans have had a notable effect on both the atolls and marine life, highlighting why further development could be detrimental.

- 1. Disruption to the Ecosystem:** Human activities have the potential to disrupt the delicate balance of Aldabra's unique ecosystem. The construction and operation of a hotel would lead to increased human presence and could disturb nesting sites for birds and sea turtles, alter the behavior of native species, and lead to erosion and habitat degradation.
- 2. Introduction of Invasive Species:** One of the significant risks associated with increased human activity, including construction, is the introduction of invasive species. These species can outcompete, prey on, or bring diseases to endemic species, leading to declines or extinctions. For instance, the introduction of pests, such as rats or certain plant species, has been known to destroy native flora and fauna. The construction of a hotel could increase the risk of more invasive species being introduced either accidentally through construction materials or deliberately through landscaping.
- 3. Pollution and Waste:** The construction and operation of a hotel would generate waste and pollution, including sewage, plastic waste, and potentially harmful chemicals from cleaning and maintenance. These pollutants can severely impact marine life, coral reefs, and water quality. Aldabra's isolation and limited infrastructure would make waste management challenging, increasing the risk of pollution entering the marine and terrestrial environments.
- 4. Pressure on Water Resources:** Hotels and their guests use a significant amount of fresh water, which could put pressure on Aldabra's limited freshwater resources. This could affect not only the human needs but also the availability of fresh water for the island's wildlife.
- 5. Increased Carbon Footprint:** The construction and operation of a hotel, along with the increased air and sea traffic to the area, would contribute to carbon emissions, further stressing the global issue of climate change. Given that Aldabra is a low-lying atoll, it is particularly vulnerable to the effects of climate change, including sea-level rise and increased storm intensity.
- 6. Cultural and Scientific Impact:** Aldabra is a site of significant scientific interest and cultural heritage. The presence of a hotel could restrict scientific research and alter the cultural landscape, potentially impacting the educational and conservation value of the atoll.

Protecting places like Aldabra requires careful consideration of human activities and development. The introduction of a hotel could lead to irreversible damage to this pristine environment, underscoring the need for conservation efforts to prioritize the preservation of such unique ecosystems over development.

Constructing a hotel on Aldabra could raise several environmental and ecological concerns due to the unique

Heritage Site.

Overall, the construction of a hotel on Aldabra would pose significant risks to its ecological integrity, biodiversity, and global heritage value, making such a development highly controversial and potentially harmful. The above is just a few of the many of the significant problems that could arise.

PERSON/ORGANISATION SCOPE

Name: Mina Accouche Post Title: Information

Analyst/Auditor

Organisation: Information


Commission

Phone Number: _____ Mobile Number: _____

2591819 _____

Email Address:

minlizacca@gmail.com

Sign:  _____

Date: 18.03.24

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DEADLINE: 19th March 2024



MINISTRY OF AGRICULTURE, CLIMATE CHANGE & ENVIRONMENT
ENVIRONMENTAL ASSESSMENT AND PERMITS SECTION (E.A.P.S)
SCOPING VERIFICATION FORM



PROJECT TITLE: Assomption Island Tourism Development

EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437

LOCATION: Assomption Island

ISSUES DISCUSSED

(Please use additional sheets if required – a separate sheet is to be used for each organisation/person undergoing scoping)

1. **EIA consultancy.** Further to the role and responsibility of the EIA consultancy as raised at the public meeting of 9-03-24 it is essential for the EIA to treat both the natural environment (eco-system, bio-diversity etc..) and the cultural/historical heritage of the island in equal measure. In general, EIA's tend to give weight to impacts on the natural environment while issues of socio-cultural implications have tended to be given less importance although not totally ignored, perhaps as a result of poorer response in this area. Given the fact that Assomption has a significant **history and story**, which are important to the national **memory**, it follows that the EIA should provide for consideration of the island's natural as well as its historical and cultural heritage.

- Throughout a significant period of Seychelles history, namely the first half of the 20th century, the export of guano from Assomption was of significant importance to the Seychelles economy. On Assomption, this started in 1908 and went on until the 1980, with a 10 year break in the 1940's).
- During the first decades of the 20th century, another important economic activity on Assomption was **turtling**, for the production of **calipee** for export to UK, and the supply of live turtles, and **kitouz** to Mahé. (This started in 1908 and in fact it resulted by the late 1920's, in the collapse of the turtle population on both Assomption and Aldabra, where turtling was also a very lucrative activity. (Hornell, 1927.)
- Because of turtle fisheries and guano mining, at one time there was a labour force of over 400 inhabitants present on the island especially during the peak years of guano extraction. Given the rotation of the residential labour over so many years **thousands** of families throughout Seychelles were familiar with or had connections with the island or were dependent on the contract salary payments of labourers working on Assomption. The old cemeteries or the ruins of the workers quarters stand as reminders of the island's past.
- It should be noted that **the first village on the island** was established in the north of the island, not far from where the "Radar installation" is situated. This has a small cemetery, two very large water tanks (with dates inscribed) and the foundations of some huts. These are definitely worth preserving as they are part of that island's early economic history. (Pictures of water tanks and graves below.)
- Historic structures and ruins which are of heritage value are to be found in the area of the present village (which was started in 1917/18) as well as in the north. See previous point.
- It must be emphasised that Assomption, as was the case with other outer islands, was associated with the first local Seychellois entrepreneurs as well as the development of domestic shipping and navigation. Seychellois folklore still abound with the names of schooners and local skippers of involved in the significant traffic between Mahé and the Outer Islands such as Assomption.
- The scale of the exploitation of guano and turtles on the island leave a dark side to its **story** but

it is of historic significance nonetheless.

2. Given its contribution to Seychelles early economic life and its historic association with hundreds of Seychellois up to the 1950's the preservation of the island's heritage and relics need particular attention in *its* future development.

3. While assurances were given in the EIA presentation of the planned development, the extent to which this is to be done needs to be fully clarified:

For example, how will the existing historic buildings and structures be enhanced/preserved in relation (or in the midst of) to the hotel's footprint? Should historic structures remain within the hotel development area (with the danger of being seen as spots of curiosity rather than clear parcels of heritage value?) Or should they remain, preserved and used where possible, within areas managed by IDC?

4. Buildings, structures and ruins that should be preserved :

- Ruins of workers residence (Close to present IDC Village)
- The Manager's House (before IDC)
- Old cemeteries:
 - (i) the small one in the north and

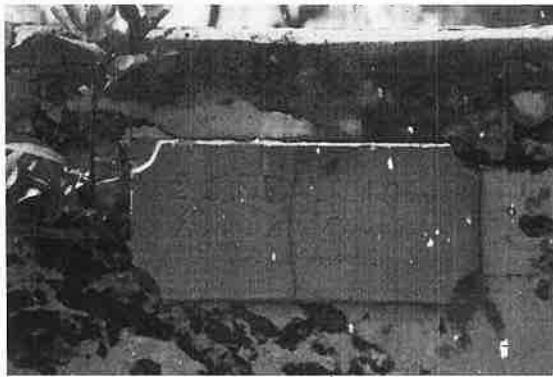


One of the graves (of a child, Mein) in the small cemetery, close to the first village (north)

- (ii) the main cemetery in front of village, close to the beach
- Part of guano sheds – existing coral walls
- Guano weight platforms
- **Water Reservoirs:**
 - (i) Large water reservoir with inscription of date of construction at the present village, close to the Guano shed
 - (ii) Two large water tanks up north, where the first village as set up (dates also inscribed thereon)

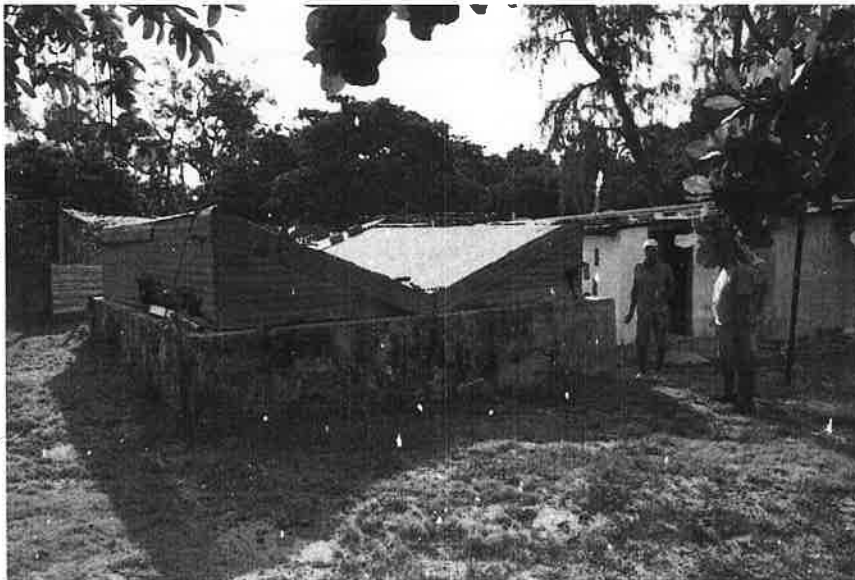


One of the *two* large water storage tanks, used by the inhabitants of the first Village

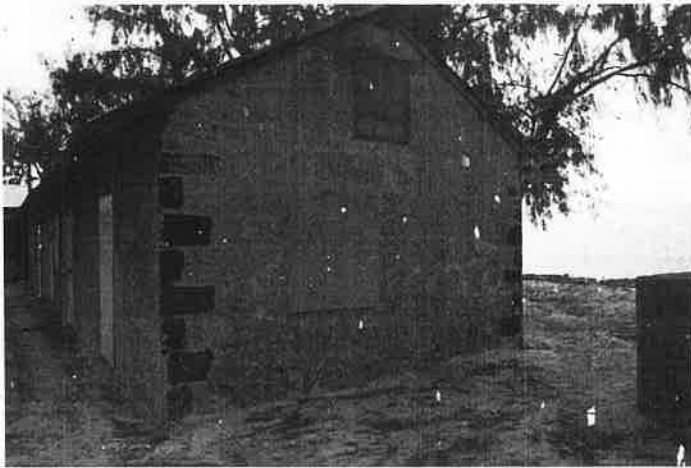


Plaque with the date of completion of the second water tank. 25th Feb 1910.

- (iii) The domestic rain water collection and storage reservoirs which are next to to the old Manager's house (part of IDC Village) See picture. There are very few of these left, either on Aldabra or Assomption.



- Set of buildings housing old post office, jailhouse (*Kaso*), clinic/hospital, chemical store etc (with construction dates clearly indicated. 1920's). Present IDC Village.



Part of the buildings built in the 1920's. Year of construction are inscribed over the doorways.

- Selected existing sections of old rail used in the transport of wagons of guano to the central depot

5. Given all the above it is in our view as representatives of an NGO that seeks the protection and enhancement of our *built* heritage, the preservation of the heritage of the island can benefit from the hotel project; this can best be achieved by a clear demarcation between the project and sites of heritage value.

Modern Developments:

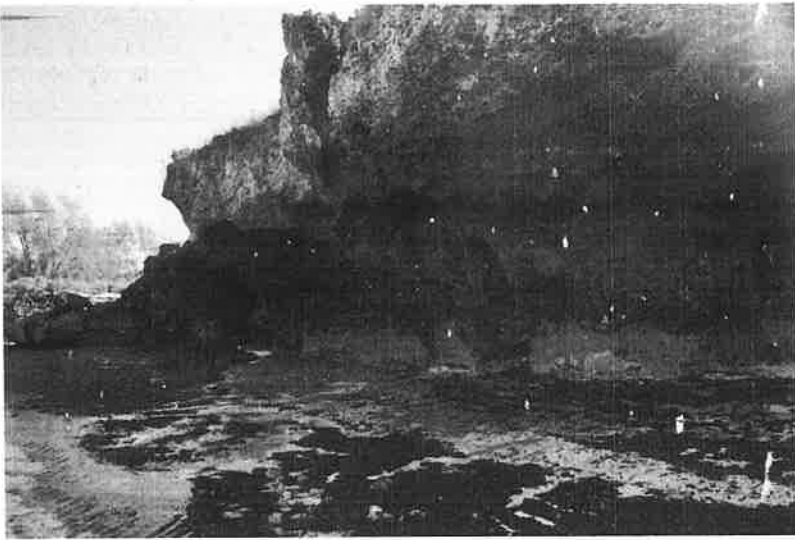
6. **Guesthouse for Seychellois Visitors:** We cannot see where this is on the plan. All island resorts should have a guesthouse for Seychellois. An IDC principle.

7. Site of the Chinese Restaurant:

I certainly do not agree that this is the most appropriate site for a Chinese Restaurant.

This particular site is one of the few, on the eastern coast, that has not been transformed by human activity in the 20th century.

In fact, it still appears "wild". There is an interesting series of caves in the small "cliff" and here, there is clear evidence that Assomption is a "raised coral reef" island, which makes this area pretty unique for Seychelles. It is important that this part of the island **is not affected by any man-made structure**. (Other "raised reef" islands are few: St Pierre, Aldabra ...)



A Chinese restaurant on the bluff would be an insult to the beauty of that part of the island. Surely the restaurant (any restaurant really) can be placed somewhere inside the Coconut Grove, and not be visible from "the wild place." This really is NOT acceptable.



PERSON/ORGANISATION SCOPED

Name: Patrick Berlouis

Post Title: _____

Organisation: ICOMOS Seychelles

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Sign: 

Date Monday 18th March 2024

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DEADLINE: 19th March 2024



MINISTRY OF AGRICULTURE, CLIMATE CHANGE & ENVIRONMENT
ENVIRONMENTAL ASSESSMENT AND PERMITS SECTION (E.A.P.S)
SCOPING VERIFICATION FORM

PROJECT TITLE: Assumption Island Tourism Development

EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437

LOCATION: Assumption Island

ISSUES DISCUSSED

(Please use additional sheets if required – a separate sheet is to be used for each organisation/person undergoing scoping)

In addition to SIF's scoping form, which was submitted on 14 February 2024, we have the following points:

1) Biosecurity management plan:

The EIA must incorporate a comprehensive biosecurity management plan that spans all phases of the proposed development. It should specifically address potential risks to both Assumption and Aldabra Atoll, considering their proximity.

Key phases to consider include:

- Planning stage: Identifying sufficient infrastructure for waste management, water treatment, and biosecurity screening.
- Construction and infrastructure development: Ensuring that construction materials (known vectors of invasive alien species like yellow crazy ants) do not inadvertently introduce invasive species.
- Operational phase: Addressing waste management practices that can attract pests and facilitate disease transmission.
- Visitor activities and interactions: Recognizing that tourists and staff may unknowingly carry invasive species or pathogens.
- Transport and movement: Acknowledging that tourist transportation (by air, sea, or land) can facilitate the spread of invasive species or diseases.
- Emergency preparedness and response: Implementing rapid response protocols to prevent or mitigate biosecurity incidents.
- Closure and rehabilitation: If there are abandoned or poorly managed tourism sites, they can become havens for invasive species.
- Monitoring and evaluation: Inadequate monitoring of biosecurity measures can lead to undetected issues. Regular assessments are crucial to identify and address risks promptly.

2) Infrastructure development:

The proposed hotel's plan does not clearly represent the development of essential services, including water facilities, electricity generation, road construction, and waste management. The scale of utilities required to support a luxury resort with 450 permanent staff (plus 500 during construction) needs to be included or should undergo a similar EIA. Considering only the permanent staff, we are looking at services to support a moderate population density of 40 people per hectare of land. Further, during the scoping meeting, the developers stated that only 1% of Assumption Island would be needed for the proposed development. This percentage appears unrealistic and seems only to calculate the footprint of the accommodation and service facilities but not the back of the house, including, e.g. staff accommodation and utility services. The proportion of land to be developed (including supporting and regulatory services) should be re-evaluated to ensure a more accurate representation of the impact.

3) International airstrip proposal:



The proposal for an international airstrip on Assomption raises significant biosecurity risks. Secondly, it could lead to increased poaching of endemic species such as giant tortoises and will require substantially more infrastructure development for operation than initially stated (1% of land development needed for the hotel), including offices, operation, and accommodation of the authorities, e.g., immigration, customs, and health. In addition, the requirements of an international airport will inevitably create a barrier to species movement and dispersal, including that of the giant tortoises.

4) Insect spraying and biodiversity impact:

While insect spraying may be necessary to create a pleasant environment for tourists, its potentially devastating impact on Assomption's rich insect diversity, including butterflies, must be recognised. Mitigation measures in the EIA are crucial.

5) Public presentation of the EIA:

The EIA for the proposed development is a critical document. We must ensure a transparent and inclusive process during the public presentation of the impacts and the measures proposed to manage them. SIF advocates for a public meeting where the EIA report is presented and assessed openly, in addition to the option of public inspection.

6) Validation of EIA:

Similarly, the validation of the EIA for a tourism development that is in close proximity to Aldabra, a UNESCO world heritage is of immense importance for the Seychellois people and the world. The developer should consider a risk assessment based on Aldabra's statement of outstanding universal values. SIF is fully committed to actively participating in this validation process if the opportunity arises.

PERSON/ORGANISATION SCOPED

Organisation: Seychelles Islands Foundation

Phone Number: 002484321735

Email Address: annabelle.constance@sif.sc

Mobile Number: 4321735

Sign:



Date: 19/03/2024

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DEADLINE: 19th March 2024



**MINISTRY OF AGRICULTURE, CLIMATE CHANGE & ENVIRONMENT
ENVIRONMENTAL ASSESSMENT AND PERMITS SECTION (E.A.P.S)
SCOPING VERIFICATION FORM**

PROJECT TITLE: Assomption Island Tourism Development

EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437

LOCATION: Assomption Island

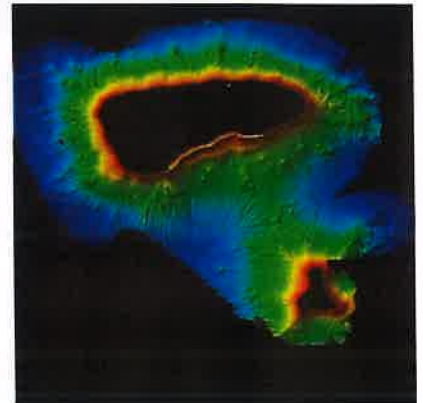
ISSUES DISCUSSED

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It has been proven that the reefs of Seychelles' outer islands are some of the last pristine coral ecosystems in the Indian Ocean and this includes that of Assomption. Assomption is one of only two significant raised reef island in the Seychelles. The beach supports a large population of nesting Green Turtles. Overall, the fauna and flora of the island is one that is very sensitive, even more so following the exploitation of guano.

We were in attendance at the Assomption EAPS scope meeting to discuss the high end resort with an international airport. Please see below for your attention, our concerns in regards to the hotel project:

1. It has now been discovered the Aldabra and Assomption rest on top of a volcano therefore all the more reason for in-depth research rather than placing the focus on high end tourism investments! A Coral Superhighway in the Indian Ocean. <https://www.ox.ac.uk/news/2024-03-12-coral-superhighway-indian-ocean>. Our sincere advice to the Emir of Qatar His Royal Highness Tamim bin Hamad Al Thani is that if he is interested in education and research then it would be a great image in his Highness' favour if a research centre to study Marine Biology and this new evidence of a coral superior highways and atolls sitting on a volcano is considered instead of a high end resort.
2. IDC's proposal to lengthen the runway is not at all viable when it comes to nesting grounds for turtles/tortoises and giant tortoises crossing. A lengthened runway would bring unwarranted pressure on moving of the species.
3. The population sudden increases during the project construction would not guarantee quarantine especially when using migrant labour! A hotel project of this size means that most of the items required for its construction and upkeep will be imported. The operations of the hotel will also mean a huge reliance on imported food which increases the risk of the introduction of pests, invasive species if rigid biosecurity measures are not practiced and policed. Given Aldabra's close proximity to Assomption, this will increase the risk of pests/invasive species getting to Aldabra. Additionally, the importation of items also leads to generating large quantities of waste packaging. The increase in population will with no doubt contaminate the water table.



4. Creating new jetties for super yachts and the likes of will be needed to secure moorings when cyclones come and the strong south east. This will necessitate a harbour similar to the picture below. This kind of construction would be needed and robbing the natural habitat. Unfortunately, there is no way around this, this is the kind of development that needs to be considered.



5. Having an international airport on Assomption and with Seychelles involvement in the Houthis and the Israel-Hamas war poses a great risk for the country. Our country must remain neutral at all times as foreign influence through association is not in our interest.

PERSON/ORGANISATION SCOPED

Name: Robin Johnston & Ella Pool-Laurence

Post Title: _____

Organisation: Self-employed

Phone Number: _____ **Mobile Number:** 2535961/2589592

Email Address: linroglobal@gmail.com / pooella1992@gmail.com

Sign:

Two handwritten signatures in black ink. The first signature is on the left and the second is on the right. They appear to be the names of the individuals mentioned in the text above.

Date: 19 March 2024

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DEADLINE: 19th March 2024



MINISTRY OF AGRICULTURE, CLIMATE CHANGE & ENVIRONMENT
ENVIRONMENTAL ASSESSMENT AND PERMITS SECTION (E.A.P.S)
SCOPING VERIFICATION FORM



PROJECT TITLE: Assumption Island Tourism Development
EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437
LOCATION: Assumption Island

ISSUES DISCUSSED

(Please use additional sheets if required – a separate sheet is to be used for each organisation/person undergoing scoping)

The Ocean Project Seychelles wishes to address the below points concerning the **Assumption Island Tourism Development project**:

1. Firstly, we would like to bring forward the re-construction/renovation of the jetty according to the Masterplan presented at the public meeting. Considering the potential marine environmental impacts associated with the construction and operation of a new jetty, we would like to request that a precise plan for the jetty be shared publicly and that its scale and scope be taken into account by the relevant governmental authorities and strongly investigated during the EIA process. If the jetty is to cater super yachts, commonly associated with the hotel's targeted type of clientele, this would mean that a deep dredge would have to be done, which would further impact the surrounding marine ecosystem. The augmentation in traffic of yachts and boats in the area, as a result of the jetty and the hotel, should also be seriously taken into account. The environmental impacts of yachts, particularly within/adjacent to marine protected areas, have been well documented by the international community of experts and researchers, notably on noise pollution, the discharge of (untreated) sewage and wastewater, anchor damage, and carbon emissions. This should raise alarms knowing Assumption is surrounded by an MSP High Biodiversity Zone 1 and just 30km away from the Aldabra atoll. We note that migratory species of whales, highly vulnerable to noise pollution, also pass through these waters during the Southeast monsoon.

In addition to the jetty, we additionally ask for ALL infrastructure related to the maintenance and operations of the island/hotel (e.g, hotel's back office, staffing accommodation, PV panels) be clearly presented in the architectural plan(s) and that these be integrated in the EIA process.

2. TOP Seychelles would also like to raise the concern of the biosecurity risks that such a large-scale development – 40 villas; 5 restaurants; recreational and wellness areas; hotel village; and staff quarters – poses to Assumption's ecosystem and, consequently, to the Aldabra atoll. TOP is well aware that the hotel developers have expressed their understanding of the situation and will be putting in place biosecurity measures. However, considering the scale of the project in terms of the number of guests and staff residing on the island, the distribution of its infrastructure near vulnerable habitats and wildlife, and expected boat/marine activities, we believe the risk to be too high, especially considering Assumption's proximity to Aldabra and the expected more frequent travels between the two islands. If the hotel is built, biosecurity checks, which are thorough and long processes, would have to be done every day and perhaps several times a day (depending on daily arrivals). Our concern is that this would not be feasible for the hotel staff to handle. We therefore urge the relevant authorities to take this matter into careful consideration, and if the project is to be approved, for it to be scaled down to at least half of its original plan.

Knowing that Assumption will also be welcoming private jets originating outside Seychelles' territory, this causes further concern regarding biosecurity threats. There will be no control over biosecurity prior to guests arriving on the atoll. We, therefore, call for the developers to ensure that there is a strict and clear biosecurity protocol for all guests to follow and a permanent conservation team on the island to handle biosecurity and environmental matters.

We additionally ask for IDC to fortify its biosecurity measures/protocol during the construction/development phase of the project, particularly in link to the unloading of containers and operation of barges.

3. We would also like to address the waste management on the island. With 450 people present on the island at maximum capacity (150 guests/300 staff), the portion of waste generated will be much more important

than at present. TOP Seychelles welcomes the idea of the hotel developers to put in place a “no plastic policy” in the resort, but wishes to know exactly how sustainable and circular operations will be integrated in the hotel’s waste management, and what preventive measures will be taken to prevent pollution from the 900°C incinerator machine. The amount of energy needed for an incinerator running at this heat will most probably need fuel generators, in addition to the solar energy present on the island. What that in mind, measures should be taken by the relevant authorities/developers/IDC to prevent any petroleum contamination on the island and its waters.

4. TOP Seychelles also feels that the development along the coastline/behind the beachfront, and especially the main beach of Assomption, will have an important impact on marine and coastal species. Indeed, as an example, Assomption’s marine area is home to a large number of green sea turtles that will see their nesting sites change with the proposed development, especially on the West Coast. TOP is aware of the preventive measures that the hotel developers wish to put in place to minimise impacts on these animals (e.g., building 30 - 33m behind the high tide line). We, however, are not sure that these measures will be sufficient enough, especially if the development (i.e. villas and, recreational space/infrastructure/activities) runs across the entire coast of Assomption’s largest beach. This most important turtle nesting beach on Assomption is already facing increasing erosion. Even with setbacks in place, there is a high risk that with erosion the resort will occupy turtle nesting habitat and hinder nesting. We therefore ask that the development does not happen along the whole beach, but only concentrates on part of it, as it has been done on many island resorts in the past. We believe this should be the case for the rest of the development as well. Indeed, although occupying 1,2% of the island’s surface area, many facilities of the resort are spread across the island, which undeniably increases the pressure on Assomption ecosystems as a whole.
5. We ask that there be a consistent and on-site presence from MACCE, the body overseeing the EIA, during the entire development phase (estimated to be between 18 - 24 months). We ask for the developers and IDC to support logistics related to MACCE’s regular site visits.
6. We would like to highlight that Assomption has the largest dunes in Seychelles and they should be preserved. No construction should occur on the dunes, or in a manner that would obstruct this natural habitat.
7. It was mentioned that some of the buildings would be built on pillars, but it was unclear whether or not this would apply for all/most infrastructure. If not, what construction methods will be used to ensure the sinkhole and cave environments are not impacted due to filling of the features? We ask that ground-penetrating radar surveys be conducted to identify underground features and position buildings away from important natural habitats/features.
8. Although this is not directly part of the project development, Assomption’s runway extension appears to be a direct result of the proposed project. Seeing as this could impede the movement of tortoises, we ask that the EIA also investigates the impact of the extended airstrip and projected air traffic. We hope that IDC considers installing wildlife corridors/tunnels to minimise impacts on the movement of wildlife.
9. Regardless of the size and scope of the project, the development and daily operations (incl. international private flights) will undoubtedly have an impact on the environment. We therefore ask if and how the developers intend to offset their footprint. We propose that a percentage of profits be dedicated, in a transparent manner, directly to conservation and climate adaptation efforts in Seychelles. We hope that sustainability will truly form part of the hotel’s core values and that certain guest rules, such as only allowing reef friendly sunscreen on the island, will also be introduced and enforced.
10. Finally, we also urge the relevant authorities and developers to take into account the existing and projected effects of climate change impacts, notably coastal erosion, sea level rise, and extreme weather patterns, which Assomption will not be exempted from. With this in mind, climate change scenarios should be integrated in the EIA to ensure that the development project takes the necessary measures to adapt to climate change impacts, and integrates nature-based solutions as far and wide as possible. We would like to see clear climate action commitments from the developers.

As a local environmental NGO, TOP Seychelles hopes that the comments made and concerns raised in this scoping form will be taken into account by the relevant authorities to guarantee the maximum protection of the marine and terrestrial ecosystems of Assomption and Aldabra.

PERSON/ORGANISATION SCOPED

Name: Victoria Alis Post Title: President (Board member)

Organisation: The Ocean Project (TOP) Seychelles

Phone Number: _____ Mobile Number: _____

Email Address: theoceanproject.sey@gmail.com



Sign: _____ Date: 19/03/2024

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DEADLINE: 19th March 2024



MINISTRY OF AGRICULTURE, CLIMATE CHANGE & ENVIRONMENT
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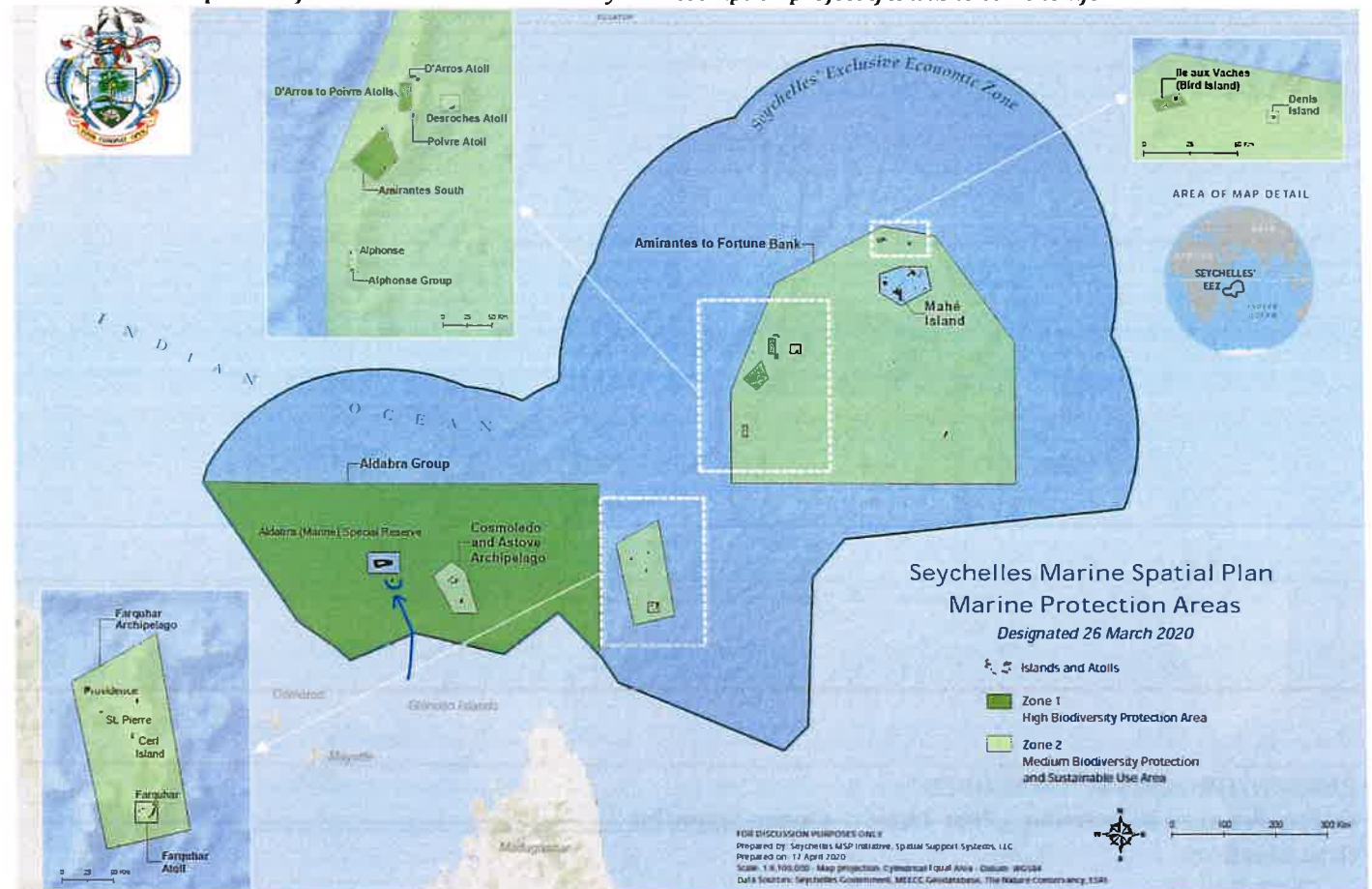
PROJECT TITLE: Assumption Island Tourism Development
 EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437
 LOCATION: Assumption Island

ISSUES DISCUSSED

(Please use additional sheets if required – a separate sheet is to be used for each organisation/person undergoing scoping)

Assumption in Zone 1 for Marine Spatial planning:

Assumption island being located as a high biodiversity hub and included in the zone 1 for MPA restricts many recreational activities. In regards to fishing a parallel assessment should be taken with monitoring of areas and type of fish species fished in the area. SIF has a protocol for this which could be used by the Assumption project if it was to come to life.



Biosecurity

Biosecurity is a major issue as Aldabra is very close by and we want to limit invasive species from coming on the atoll. Biosecurity needs to be done properly before boarding aeroplane to Assumption and the staff needs intense training to make sure biosecurity is done properly.

Will any kind of support be given to SIF staff on Aldabra to deal with the more important flow of visitors and the biosecurity checks that come with it?

Barges bringing equipment to the island at the moment should understand the importance of biosecurity.

In the perspective of an ocean scientist and Seychelloise who has indeed worked on Aldabra this island is very delicate and unlike many islands I have ever visited. Aldabra contains the second largest frigate bird population, it consist of an animal which is now extinct in the inner island (Dugong), many migratory bird fly in and out of these islands and more. Conservation effort is sincerely vital and frequent boat activities on the sea can cause disturbance and cause harm due to the vast number of seaturtles swimming in these water. Many turtle which have been tagged and are being closely monitored move around Assumption and many lays there as well it is very important for the guest to understand not to disturb them during nesting seasons.

Dunes:

Assumption is among 3 places in Seychelles with dunes, many biodiversity depend on such habitat and it shelters the islands from prevailing wind as well. Very little is known about such habitats in Seychelles.

PERSON/ORGANISATION SCOPED

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DEADLINE: 19th March 2024



MINISTRY OF AGRICULTURE, CLIMATE CHANGE & ENVIRONMENT
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PROJECT TITLE: Assomption Island Tourism Development
EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437
LOCATION: Assomption Island

ISSUES DISCUSSED

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The proposed tourism development should be intricately linked with the establishment of a conservation, security, and surveillance presence and associated infrastructure at Assomption Island. This integrated approach will empower Seychelles to enhance territorial protection against illicit natural resource exploitation, international piracy, and unauthorized entry, while also providing a responsive platform for addressing potential marine-related incidents, particularly in the vicinity of Aldabra.

Nevertheless, it is imperative to exercise caution and implement measures to minimize and mitigate adverse environmental effects on the distinctive natural features and biodiversity of Assomption Island. These encompass but are not limited to the following:

- Assomption location in relation to Aldabra:
Assomption Island, positioned 27 km southeast of Aldabra Atoll, experiences prevailing southeast trade winds that directly transport air and surface currents from Assomption to Aldabra. Due to this meteorological interconnection, maintaining Assomption in an environmentally pristine state is imperative. Any toxic pollutants or invasive species, particularly birds and insects, present on Assomption have the potential to be carried to Aldabra by the wind and surface currents.

Recognizing this ecological vulnerability, the Seychelles Islands Foundation (SIF) undertook a substantial, labour-intensive, and ultimately successful campaign to eradicate two species of exotic invasive birds—Whiskered Bulbul and Madagascar Fody—from Assomption by 2015. This initiative aimed to prevent the colonization of Aldabra by these invasive species and mitigate competition with the indigenous bird population.

- Beaches:
The west coast of Assomption features the picturesque 5.8 km-long Settlement Beach, widely regarded as one of the most stunning beaches in Seychelles. Complementing this natural beauty are an additional 1.9 km of smaller, ruggedly attractive, and windswept beaches along the east coast. Collectively, these coastal stretches account for 45% of Assomption's shoreline, showcasing the island's diverse and captivating beachscape.
- Beach Dune Ecosystem:
Elevated sand dunes, reaching up to 30 meters in height, grace the southeast rim of the island, harbouring communities of native and endemic plants, such as the distinctive "tortoise turf," and hosting a population of Giant Tortoises. These remarkable natural features contribute to the island's ecological richness.

On the southeast coast, an additional set of high sand dunes, ascending to 30 meters above sea level, stands as a unique highlight, accommodating exclusive communities of both flora and fauna. This noteworthy landscape is situated alongside an impressive beach extending 1,225 meters in length, further enhancing the ecological diversity of the island.

Evidently, a substantial portion of the dunes have already been altered, damaged, or disturbed to expand the airstrip, while the remaining dunes have been designated as a “Dune Adventure Area”. Given this context, although the exact activities are yet publicly unknown, it is crucial to emphasize the imperative restriction on the use of horses, heavy motorized vehicles, bicycles, or similar modes of transport that may exacerbate the vulnerability of these sensitive dunes, aiming to prevent any further erosion or degradation. Ideally, designated trails and areas that are safe and less impactful should be identified for the proposed activities.

- Marine Protected Area:

The Aldabra Group holds the designation of a High Biodiversity Area under the Seychelles Marine Spatial Plan (SMSP). It is imperative that all activities adhere strictly to the permissible actions outlined in the Marine Spatial Plan and Zone 1 Regulations to ensure the preservation and protection of this ecologically significant region.

- Sea Turtles:

Assomption boasts 7.7 km of pristine Green Turtle nesting beach, surpassing Aldabra's 5.2 km. In the early 1900s, both Aldabra and Assomption harboured substantial Green Turtle nesting populations. However, excessive exploitation, particularly at Assomption, led to a significant decline, with turtles nesting near guano worker settlements. Presently, both turtle populations are recovering, and Aldabra hosts the largest nesting Green Turtle population in the Western Indian Ocean. With ongoing protection, Assomption's Green Turtle population has the potential to rival Aldabra's once again.

Alarmingly, based on the provided diagrams, roughly two-thirds of Assomption's shoreline, which encompasses a significant portion of the crucial nesting beach, is adjacently earmarked for development. These areas are highly conspicuous from the beaches, characterized by sparse vegetation coverage. This development presents several concerns, including nocturnal light pollution impacting nesting turtles and potentially disorienting hatchlings during emergence. Additionally, the presence of low-lying swimming pools poses a hazard to turtles if they accidentally fall in, while human and horse-riding activities during daylight hours may also cause disturbances. It is crucial to investigate and adopt mitigative strategies to reduce threats to sea turtles, thereby safeguarding the ongoing conservation of their population and habitat.

- Island Rehabilitation Potential:

There is potential for island rehabilitation on Assomption to facilitate the translocation of species surviving on Aldabra, which historically inhabited Assomption, and to reintroduce nesting seabirds that are currently extinct on the island. Among the lost breeding seabirds are Abbott's Booby, Masked Booby, and Red-tailed Tropicbird. Land birds, including an endemic race of White-throated Rail, Madagascar Turtle Dove, Madagascar Coucal, Aldabra Fody, and potentially others,

also faced extinction due to guano mining. Dimorphic Egrets, once breeding on Assomption, are now limited to Cosmoledo and Aldabra in Seychelles. Notably, the Souimanga Sunbird, an endemic species, still persists on the island, while the status of the Pied Crow remains uncertain.

Despite the historical ecological impact, Assomption has recorded a diverse avian population, with a total of 76 bird species documented, surpassing other islands south of the Amirantes, except for Aldabra. The notable numbers include 59 species on Cosmoledo, 48 on Astove, 53 on Farquhar, 42 on Providence, and 40 on St Pierre. This substantial diversity suggests that Assomption serves as a vital flyway for various migratory species, underscoring its ecological significance in the region.

The rehabilitation efforts would revive the habitats for a variety of avian species, contributing to the overall ecological health of Assomption. Simultaneously, the return of diverse birdlife and the rejuvenation of natural ecosystems have the potential to make Assomption a more attractive destination for eco-tourism, providing visitors with a unique opportunity to observe and appreciate the flourishing biodiversity. This dual impact underlines the multifaceted advantages associated with the rehabilitation efforts on Assomption Island.

- Giant Tortoises:

Throughout the guano mining era, giant tortoises were eradicated from Assomption; however, subsequent re-introduction efforts were initiated, bringing these majestic creatures back from Aldabra. Presently, Assomption is home to a thriving breeding population of several hundred giant tortoises, with a notable concentration found in the area near the southeastern coast dunes, featuring distinctive stretches of "tortoise turf."

Considering the increased frequency of flights and the limited availability of suitable foraging areas for tortoises beyond the airstrip, it would be highly advisable to install a barrier or fence around the airstrip to mitigate potential issues during aircraft operations. Such measures would be particularly advantageous in emergency situations. Furthermore, if the airstrip were to be fenced off, it would be imperative to enhance habitats in alternative safe areas away from the airstrip to accommodate the tortoises' needs.

- Insects and Plants:

Assomption is home to plant and insect species with limited distribution, particularly in the vicinity of the sand dunes. Referred to by certain people as "the Butterfly Island," Assomption boasts a remarkable diversity of butterflies, surpassing any other location in Seychelles. Notably, species like *Belenois aldabrensis*, a butterfly exclusive to Assomption, Aldabra, and Astove, contribute to the unique and rich biodiversity of the island.

The indigenous *Tournefortia argentea*, commonly known as bwa taba, stands as a dominant presence within the dune ecosystem and throughout Assomption Island. It serves as the exclusive food source for the endemic day-flying moth *Utetheisa lactea aldabrensis*, which is native to Assomption, Aldabra, Cosmoledo, Farquhar, Providence, and the Glorieuses islands. Additionally, a distinct variant, *assumptionis*, was taxonomically identified on Assomption in 1919.

The grasshopper species *Ptenoscirtus aldabrae*, endemic to Assomption, Aldabra, Cosmoledo, and Europa, thrives in the vicinity of the sand dunes. Furthermore, the marshy areas adjacent to the dunes host a diverse population of mud-dauber and mud-potter wasps.

Several plants with a very restricted distribution are found on Assomption:

1. **Endemic to Assomption** - *Panicum assumptionis* (an endemic grass);
2. **Endemic to Assomption & Aldabra** - *Cassia aldabrensis*, *Hedyotis prolifera*, *Tarenna verdcourtiana*, *Stenotaphrum clavigerum*;
3. **Endemic to Assomption, Aldabra & Cosmoledo** - *Portulaca mauritiensis* var. *aldabrensis*, *Erythroxylum acranthum*;
4. **Endemic to Assomption, Aldabra, Cosmoledo & Astove** - *Allophyllus aldabricus*, *Sideroxylon inerme* subsp. *cryptophlebia*, *Nesogenes dupontii*, *Acalypha claoxyloides*, *Euphorbia stoddartii*, *Eragrostis decumbens*;
5. **Endemic to Assomption, Aldabra & Astove** - *Secamone fryeri*, *Hypoestes aldabrensis*, *Clerodendrum glabrum* var. *minutiflorum*, *Lomatophyllum aldabrense*.

There is a strong probability that both insect and plant diversity surpass current recorded levels, while the interactions between them remain insufficiently studied. This underscores the necessity for specialized ecological assessments to precisely evaluate these dynamics.

- **Biosecurity:**

It is paramount to prioritize the development and rigorous adherence to a robust yet pragmatic biosecurity protocol throughout the construction phase of the resort and its subsequent operational phases. This especially becomes pertinent during the importation of construction materials to the island, as well as when introducing new species such as horses and plants for landscaping purposes. While implementing biosecurity protocols may appear burdensome and expensive initially, the damage caused by an introduced species and the cost of removing it from the island once established will be significantly higher.

Biosecurity protocols are particularly crucial in anticipation of potential rehabilitation and species reintroduction initiatives in the future. Additionally, comprehensive measures should be considered, including the eradication of rats from the island, thereby complementing the eradication program in the works for Aldabra.

- **Pest control:**

Efforts aimed at bolstering environmental sustainability and executing precise pest control measures are essential to protect the diverse invertebrate population on Assomption. Achieving this objective requires thorough research and the adoption of eco-friendly methods to control pests within the resort area and any planned local fruit and vegetable gardens on the island.

- **Security:**

While Assomption is not located directly within the cyclone belt, it experiences periodic severe weather anomalies. Conducting a thorough risk assessment of natural disasters, encompassing tropical storms, cyclones, tsunamis, coastal erosion, and flooding, is crucial. It is imperative to develop comprehensive contingency plans to address these potential hazards. Moreover, strategic

measures should be implemented to ensure that infrastructure is appropriately positioned and designed to withstand the impact of such events.

Significant portions of the island's interior and certain coastal areas are characterized by razor-sharp "champignon coral," posing a considerable risk to both visitors and residents. It is essential to systematically identify, map, and physically label these areas, and if required, establish cordons for human safety.

Furthermore, it is essential to identify and address potential hazards or threats, such as construction materials/debris, fire, pollutants, oil spills, chemicals, pesticides, invasive alien species (IAS), diseases, and horses that may endanger island wildlife, including tortoises, sea turtles, cetaceans, coral reefs, native plants and insects, both during and after the construction phase. Mitigative actions should be planned and implemented accordingly to minimize environmental impacts. For instance, introducing horses to the island requires meticulous evaluation. This entails comprehensive health checks, phytosanitary assessments, and quarantine procedures upon their arrival. Identifying and restricting horse-riding activities to designated areas during specified times. Moreover, the risk of riding along beaches must be assessed and determine whether possible, to avoid trampling on turtle nests or disturbing nesting turtles. Importation of feed, which is highly likely, must be strictly regulated to prevent the introduction of invasive alien species (IAS) and diseases.

Moreover, careful consideration must be given to secure sustainable management of resources, particularly water and energy, which are critical for both short-term and long-term sustainability in the isolated environment of Assomption. Given the island's limited freshwater resources, measures should be implemented to prevent depletion, such as the installation of a desalination plant. Careful consideration should be given to the placement of the intake and outlet pipes to limit contamination and impact on the surrounding reefs.

Presently, Assomption relies on diesel generators for energy production. To support additional energy consumption resulting from development, it is recommended to install a solar energy farm. Ideally, this system should be designed to meet at least 90% of the island's energy demands, thereby reducing carbon emissions, operating costs, and the likelihood of accidental pollution incidents.

- EIA Implementation Oversight and Reporting:

To ensure effective oversight and reporting, it is imperative to establish a transparent functional monitoring and reporting mechanism. This system will serve to diligently monitor, assess, and report pertinent information to the appropriate management/regulatory bodies, including the Islands Development Company, Ministry of Environment and Climate Change (MECC) and the Seychelles Ocean Agency (SOA). Additionally, it is crucial to delineate clear roles and responsibilities for each party and facet of the Environmental Impact Assessment (EIA) implementation process.

Name:
Post Title:
Organisation:
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EIA CONSULTANT: Island Conservation Society (ICS) - 4375354, 2539529, 2506437

LOCATION: Assomption Island

ISSUES DISCUSSED

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This tourism development project on Assomption raises both concerns and very challenging opportunities.

The opportunities are highly significant and linked to the huge rehabilitation potential of this island, **at the condition that a clear and unequivocal commitment is obtained from the developers to fund these activities**, which in total should amount to well over 1M USD, plus the ongoing costs of having long-term conservation and scientific teams permanently operating on the island to implement these activities.

This should include in particular the eradication of rats and cats (it would be by far the largest island where this has been done in the Indian Ocean, and one of the largest in the tropical world), and the (re)introduction of half-a-dozen endemic forms of birds existing only on Aldabra, hence creating safeguard alternative populations for emblematic animals such as the Aldabra flightless rail or wild Aldabra giant tortoises. However, restoring and most importantly maintaining such a restored island in the long term constitutes a real challenge.

Touristic developments done in several private islands in Seychelles have already demonstrate the benefits that small, high-end tourism resorts with a limited resident population can bring for the nature conservation on these islands. However, this must be based on a realistic and genuine nature conservation oriented philosophy, with a deep understanding of the importance of biosecurity – in particular to prevent reinvasion by rats, but also invasive plants, reptiles, ants etc. North Island Ltd, an 11 high-end luxury villa resort, well integrated in the island's landscape, is an excellent example of such successful development for both conservation and tourism, whereby what was once an island with no economic activity, covered in rats and other invasives, has progressively become through long-term active ecological restoration an island of high biodiversity value.

The concerns about the Assomption tourism project are in my view linked mainly to its size. Although it is presented as occupying less than 1% of the island, this development is spread over much of the island and most of the West Beach, one of the most beautiful and one of the main nesting beaches for marine turtles in Seychelles. The presence of 44 exclusive villas, even if constructed 45m above the water mark, plus the restaurants, cinemas etc. in the southern part of the Eastern beach, will not leave much beach area exempt of human interference, neither much beach area for local staff working on Assomption or transiting to Aldabra.

In addition, Assomption, which has about 7,7km of beaches suitable for nesting turtles (i.e. larger than Aldabra), and hosts about 200 nesting Green turtles per year, has the potential to become as important as Aldabra as a turtle nesting site (which hosts about 2000 nesting females). Although Green turtles lay at night, and activity of the tourists are expected to be reduced at that time, evening and night activities on the beach will represent a source of disturbance for the turtles. It is therefore important that turtles can find an area where they can lay in total quietness without risks of being disturbed by any human activities. This will only be possible if a significant part of the Western beach is protected from constructions and developments.

As a general concept, keeping a significant part of the island – including part of the West beach – free of any development so that at least one well identifiable part of the island can be managed as a nature reserve would be commendable. It would in our view greatly improve the concept of this project. In this reserve area, wildlife (giant tortoises, birds, crabs, etc.) could thrive without risks of being trampled by vehicles, or disturbed, including on the beach (migratory birds, green turtles at night, etc.). This would be a place where intensive conservation and education activities could take place. Several islands of high biodiversity carefully integrating tourism and nature conservation follow this concept of keeping a significant part of the island free of any development, a land-use concept that we support and recommend.

In terms of concept, I fail to see the interest of having so many restaurants, cinemas etc. on an island like Assomption, where guests should rather be invited to enjoy the local peaceful atmosphere of the southern islands, the local fauna and flora (giant tortoises, etc.) and the local culture.

Assomption has a number of unique ecosystems that need to be well preserved and be kept far from any development. This includes sand dunes, marine caves and mangroves, and plant communities (see latest ICS reports; Senterre 2024, and Burke et al. in prep. done as part of the EIA process). In that respect, the presence of entertainment and wellness centers too close or even on the dunes is in our view not reasonable.

The presence of up to 450 people on the island (300 workers and 150 paying visitors) means that a draconian system of biosecurity will need to be set up and continuously applied. In Seychelles, we know we are able to keep over the long-term (over 20 years) islands without rats and other invasives at the same time as human communities of up to 130-150 workers and 25-50 visitors on these islands. These include Ile du Nord (North Island), Frégate Island, Denis Island, Cousine Island, and to a lesser extent Bird and D'Arros islands, that still have rodent populations. All these islands are privately owned and managed, apply strict biosecurity protocols, and all have a resident population within the limits indicated above.

Keeping a large island with 300 staff and 150 tourists (which more than doubles the existing limits), rodent and pest-free will be a huge management challenge. With so many equipments and infrastructure, and goods constantly required to feed, accommodate and entertain such a large hotel and resident population, chances to get new invasive species such as Yellow crazy ants, House mice, or invasive reptiles will dramatically increase. Without any previous experience of managing pest-free islands with strict biosecurity protocols (apart from ICS which manages Aride Island Nature Reserve) the long-term sustainability of keeping Assomption pest free will be far more uncertain than for the above mentioned islands with smaller hotels.

Our book "*Invasive Alien Species in Seychelles: Why and how to eradicate them ? Identification and management of priority species*" (Rocamora & Henriette, 2015) details the complexity of rodent and cat eradications, and the biosecurity measures required to keep an island pest-free (see Annex 1 and other sections that list and illustrate risk abatement measures and the other protocols that we have recommended). Having led the majority of rat eradications in Seychelles, and provided post-eradication guidance to these projects, I am very satisfied to see how these island restoration projects, including several with small hotels, have managed to keep these islands rodent-free and with an acceptable level of biosecurity over the long term. However, all of these projects were of limited size, and examples of islands with a hotel and a resident population as intended on Assomption, do not exist yet in Seychelles, and to my knowledge neither elsewhere in the tropical world.

Finally, it is important that the existence of this project goes hand-in-hand with the possibility for small numbers of local Seychellois residents and nature enthusiasts to visit and stay on Assomption at an affordable cost, and to create - currently non-existing - ways for ordinary citizens of Seychelles to go and visit Aldabra.

In conclusion, whilst we acknowledge the opportunities created by this tourism development project, but also the huge challenges it raises, our recommendation is that this project is reviewed and scaled down in size in order to reduce its impacts, increase the attractiveness of its concept, and improve its long-term sustainability. This would provide an even more private and exclusive character, and a greater credibility and commitment for the long-term conservation and restoration of the landscapes, fauna and flora of Assomption, hence significantly increasing the local acceptance of this project. This would, in particular, make it more realistic for Assomption to be kept free of (new) invasive species such as rodents, invasive plants, reptiles, ants, snails and other invertebrates, so that this project does not represent an additional threat to neighbouring Aldabra, the jewel of the crown of Seychelles and one of the most important World Heritage Sites in terms of nature conservation, where one of the most challenging island conservation programmes is currently being planned.

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