



June 4th, 2020

**MARE DECKARD**

**RE: Ecotourism Certification for Tourism Development Projects**

Dear Ms. Deckard,

Salutations from the **Global Ecotourism Network (GEN)** and we hope that all of you are staying healthy and safe during the global pandemic.

We are writing to respond to your inquiries about the certification of tourism developments off the South Carolina coast and to share our thoughts about specifically the possible development on Bay Point Island.

The **Global Ecotourism Network (GEN)** is an umbrella organization for regional ecotourism networks throughout the world that represent Europe, Asia, Africa, North America, Latin America /Caribbean and the Middle East. We were founded in 2015 by the members of the Advisory Board of *The International Ecotourism Society (TIES)*, after the whole board resigned due to grave doubts and long standing concerns that we all shared about the lack of transparency, the absence of ethical guidance and ongoing perceived anomalies in the supervision and management of *TIES* by some members of the Executive Board who controlled the finances and decision making processes.

As a group who has over 250 years of combined experience in ecotourism, its development, management, research, and outreach, we feel confident about our ability to help others to understand and hopefully support ecotourism and its responsible management. In this light, we have looked at the official information on the Bay Point Island project and below is the reasoning why we have some strong concerns about its presumptive ecotourism certification proposed by Mr. Jon Bruno of *TIES*.

### **I. About TIES today**

Based on the evidence that we have seen both in our legal research and web searches, it appears that neither *TIES* nor the *ITC*, which holds *TIES* as one of their subsidiaries, is legally registered in the USA as corporations in good standing. Therefore, it is worrisome that a tourism project's viability as an ecotourism developer would hinge upon the *TIES* "certification", especially as it seems to us to a nonexistent NGO. We would strongly recommend that you substantiate this further and as importantly, that you read our document about doing the "Due Diligence" when it comes to working with *The International Ecotourism Society*.

Please also note that when we were the Advisory Board at *TIES*, Mr. Jon Bruno was **responsible solely** for financial matters. We do not believe that he is knowledgeable nor an expert in ecotourism or certification.

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🌐 [www.globalecotourismnetwork.org](http://www.globalecotourismnetwork.org)



## II. About Certification

One does not certify using a “definition” of ecotourism as the platform. One certifies conformity with a set of accepted standards. These can be; a) internal standards (first party certification or self-certification), b) standards set by company which are verified by a representative of a company (second party certification) or the most reliable, c) certification with accreditation (third party certification with independent auditors). *Accreditation is the formal declaration by a neutral third party that the chosen certification program is administered so it meets the relevant norms or standards of said certification program.*

We believe it is dangerous for any ethical and responsible organization to even consider certifying a tourism project in this way that Bay Point Island has been certified by TIES. We are not saying that the project in question is not going to be a viable ecotourism company, rather that it is not viable or credible to ask or receive the necessary criteria, assessment and ongoing monitoring from any objective NGO. There are private companies (who do not represent the ecotourism businesses around the world) whose mission and focus is on training and certifying destinations, hotels, tour operators and many other tourism linked businesses for “**Sustainability**” or “**Good Practices**”, but they are for-profit businesses whose livelihood comes from the payment for these certifications. There are no organizations globally who are capable of “certifying” whether a proposed project will be a valid ecotourism business.

## III. About the Risks of Going Ahead

It is alarming that any permits or considerations for construction would be granted without having completed a credible and professionally researched **Environmental Impact Statement (EIS)** by a competent establishment that is authorized to conduct such studies. This is particularly crucial with the fragility of this coastal area and the island’s biodiversity, including the endemic or native species of flora and fauna and contamination from visitors. Furthermore, a credible EIS would also address the impact to local cultures and peoples as well as the use and availability of water, aquifers, wastewater treatment, construction impacts and so much more. If there is no EIS it is impossible to know the real risks of the development and thus it would be impossible to evaluate and know if the solutions offered in the documents are the right ones.

Another major risk to be considered here and frankly for all future development is **climate change**. We feel that any community or investor serious about development on a barrier island that is susceptible to hurricanes and affected by rising sea levels\*, should have made this a key component of their evaluation. Obviously from a purely financial viewpoint, there could be considerable risk for the developer and the community if these criteria are not considered.

\*For more information we suggest visiting the following link: <https://coast.noaa.gov/slr/#/layer/sce/0/-8990890.87821559/3795364.58286669/10/satellite/32/0.8/2050/interHigh/midAccretion>



#### IV. About Risk to Reputation

In our view, if the project goes ahead without the necessary due diligence on TIES, certification and an **Environmental Impact Statement** as well as a **Socio-Cultural Impact Study**, this could have adverse effects on the future of the local communities, the people and as a potential tourism destination. Community approved developments that do not incorporate responsible and conservationist policies (and philosophies) will probably suffer in the long term.

I hope this helps with your work to ensure the responsible use of the island and the important considerations to be made before any permits are issued.

Sincerely,

A handwritten signature in black ink, appearing to read 'Glenn Jampol', is positioned above the printed name.

Glenn Jampol, Chair  
**Global Ecotourism Network (GEN)**