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## Background

The “East Point Planning Study” (from here the “Oostpunt Study”) was sponsored by the Executive Council of the Government of Curaçao. This document was finalized on 31 May 2011. It was downloaded from the website of the Government of Curaçao in November 2012. The Oostpunt Study was prepared with input from Wolff Landscape Architecture, Inc (“Wolff”), Langan International, LLC (“Langan”), and EcoPlan, Inc (“EcoPlan”). Within the Oostpunt Study is an “Environmental and Ecological Assessment Report” and an “Infrastructure Assessment and Sustainability Report,” both of which are attributed entirely to Langan in the text of the study.

The “Economic Impact Study” (“EIS”) was prepared by KPMG The Netherlands, KPMG Curaçao, and Decisio (from here on abbreviated as “KPMG”). It was finalized on 13 May 2011 and downloaded from the website of the Government of Curaçao in November 2012.

A public presentation of the proposed zoning plan and other aspects of the Planning Study were presented on Curaçao on 30 October 2012 by the Eastpoint Planning Committee and representatives of Wolff (Ted Wolff) and Langan (Eric Schwarz). This presentation is referenced below as the “Public Presentation.”

These comments were written in English similar to the Oostpunt study.

## **General shortcoming of the Oostpunt Study and EIS**

### **Proposed development contradicts existing and planned government policies**

The high level of development proposed at Oostpunt will cause the degradation and loss of sensitive ecosystems on Curaçao, including the island's most pristine coral reefs. The authors of the Oostpunt Study have not adequately addressed the effects of their proposed development scenario on the ecosystems that other government branches of Curaçao strive to protect. For example, the Ministry of Health, Environment and Nature (GMN) has recently taken action to install internationally-protected wetland reserves under the RAMSAR treaty, aimed at preserving Curaçao's marine resources. These same resources will be damaged by the proposed development of Oostpunt. The proposed development scenario offsets much of the effort and directly conflicts with policies in other Ministries of the government. Furthermore, it was recommended that the Oostpunt area become a natural park in the Physical Tourism Plan of the Curaçao Tourism Board (CTDB, 1992, p. 143). The same plan also states (p. 8) that Oostpunt should be made not a small nature park but the second-largest natural park on Curaçao.

### **Developing Oostpunt causes Curaçao to break international treaties**

The proposed development goes against international agreements to which Curaçao has undersigned such as the SPAW Protocol and Protocol Concerning Pollution from Land-Based Sources and Activities. Both protocols follow from the Cartagena Convention, an international treaty undersigned by Curaçao. Relevant passages are referenced below:

The Cartagena convention (in Article 3) requires that the undersigned countries take “necessary measures to protect, preserve, and manage areas that require protection to safeguard their special value and threatened or endangered species of flora and fauna. Each party is required to regulate, and where necessary, prohibit, activities having adverse effects on these areas and species.”

Article 4 states that “each Party shall, when necessary, establish protected areas in areas over which it exercises sovereignty, or sovereign rights or jurisdiction, with a view to sustaining the natural resources of the Wider Caribbean Region, and encouraging ecologically sound and appropriate use, understanding and enjoyment of these areas, in accordance with the objectives and characteristics of each of them. These areas shall be established in order to conserve, maintain and restore, in particular: (1) representative types of coastal and marine ecosystems of adequate size to ensure their long-term viability and to maintain biological and genetic diversity; (2) habitats and their associated ecosystems critical to the survival and recovery of endangered,

threatened or endemic species of flora or fauna; (3) the productivity of ecosystems and natural resources that provide economic or social benefits and upon which the welfare of local inhabitants is dependent; and (4) areas of special biological, ecological, educational, scientific, historic, cultural, recreational, archaeological, aesthetic, or economic value, including in particular, areas whose ecological and biological processes are essential to the functioning of the Wider Caribbean ecosystems.”

The Protocol Concerning Pollution from Land-Based Sources and Activities (Article 3) “requires contracting Parties to, in accordance with its laws, the provisions of this Protocol, and international law, take appropriate measures to prevent, reduce and control pollution of the Convention area from land-based sources and activities, using for this purpose the best practicable means at its disposal and in accordance with its capabilities.”

The SPAW Protocol which follows from the Cartagena Convention and specifically addresses Specially Protected Areas and Wildlife, requires contracting parties, when necessary, to establish protected areas in areas over which it exercises sovereignty, or sovereign rights or jurisdiction, with a view to sustaining the natural resources of the Wider Caribbean Region, and encouraging ecologically sound and appropriate use, understanding and enjoyment of these areas, in accordance with the objectives and characteristics of each of them. Such areas shall be established in order to conserve, maintain and restore, in particular (1) representative types of coastal and marine ecosystems of adequate size to ensure their long-term viability and to maintain biological and genetic diversity; (2) habitats and their associated ecosystems critical to the survival and recovery of endangered, threatened or endemic species of flora or fauna; (3) the productivity of ecosystems and natural resources that provide economic or social benefits and upon which the welfare of local inhabitants is dependent; and (4) areas of special biological, ecological, educational, scientific, historic, cultural, recreational, archaeological, aesthetic, or economic value, including in particular, areas whose ecological and biological processes are essential to the functioning of the Wider Caribbean ecosystems

Clearly, the development of Oostpunt—using *a priori* defined development scenarios (i.e., 45, 55 and 60% development) and without proper impact studies to determine whether Oostpunt’s natural resources will be irreversibly damaged by such level of development—violates all of the international agreements mentioned above that have already been underwritten by Curaçao.

## **The authors of the Oostpunt Study have not used the extensive amount of literature provided to them by Carmabi**

On 2 March 2011, by request, a sampling of relevant scientific papers related to coral reefs and the effects of anthropogenic disturbances on reef health were sent to Wolff Landscape Architecture by scientists at Carmabi. This large body of information relevant to Curaçao's marine resources and the coral reefs near Oostpunt was largely ignored by the authors of the Oostpunt Study: only two of these resources were cited in the entire study, *despite* the fact that local NGOs (including Carmabi) were specifically invited by Donald de Palm of the Eastpoint Planning Committee and Wolff himself (his email to Carmabi dated 17 February 2011) to provide Wolff with such information during a stakeholders meeting in February 2011 at the DROV offices.

On 17 February 2011 Wolff requested Carmabi for information regarding Oostpunt by email: *"...if you were to provide us with any inventories, surveys, analyses, reports, etc., in your possession that would ensure that we are aware of the information, and can incorporate it into your planning and development studies and analyses of potential ecological and environmental impacts. In other words, your early and timely input could help frame the planning study, whereas if we receive no information we will still be obliged to proceed with our planning study as contracted with the Government of Curaçao."* This information was sent soon thereafter (2 March 2011) after Carmabi requested additional information as to what degree the Oostpunt area could be developed (see page 14 "Justification for the various development scenarios (45, 55 and 60%) is lacking ..."). Despite all the above, none of the information sent was used in any meaningful way in the Oostpunt study.

In fact, in the entire section on coral reefs in the Oostpunt Study, the authors cite only one scientific paper, one book, one pdf report (already publically available through Carmabi's website), and one website (Carmabi.org). In their "Ecological Assessment" section of the Oostpunt Study, Langan wrote that Vermeij's description of Oostpunt was, "unsubstantiated by any scientific citations." Ironically, all excerpts used in their document were directly taken from the primary scientific literature on Curaçao's coral reefs that were sent by Carmabi to Wolff on 2 March 2011. This is evidence that Langan International *did* have on hand the scientific citations to substantiate Vermeij's claims about Oostpunt *and* that Langan did not conduct any of their own research of primary literature regarding development and coral reefs. This reveals poor

scholarship and/or a deliberate attempt to discredit the expertise of scientific coral reef professionals.

### **The report contains calculation errors**

The Oostpunt Study contains basic mathematical errors. For example, in the Executive Summary, blatant mistakes are made in the calculation of the percentages associated with different land usages: The proposed Park is 65 hectares and it is stated to cover 1.5% of the total site area, however, when Water covers 81 hectares and it also is stated to cover 1.5% of the total site area. Consequently, any of the calculations presented in the Oostpunt Study may therefore be wrong. Given this lack of rigor and reliability, the Oostpunt Study fails to adequately or accurately convey crucial information related to the proposed development scenarios.

### **The report evaluates no other development options that tourism/residential development**

While the development of Oostpunt can be considered, it is unclear why the authors of the Oostpunt Study have explored no other options other than tourism/residential development to develop Oostpunt in such a way that benefits Curaçao in a wider context.

**Overview of issues related to the ToR and specification therein in relationship to the Oostpunt Study (dated 31 May 2011) as presented on 30 October 2012 and provided through the government’s website and made available at the Ministry of VVRP**

**The purpose and status of the Oostpunt Study are unclear**

The document “Terms of Reference, Planning Study for the Development of Eastpoint Curaçao” (i.e. the “ToR”) is dated 21 September 2010 and was provided by the government to Carmabi during a stakeholders meeting in February 2011. The ToR specifically requests the delivery of this study as the “East Point Planning Study” (see title page). However, the East Point Planning Committee referred to this plan as a “zoning plan” during the public presentation. The difference between the two is presently unclear, especially because at several occasions in the ToR (e.g., pp. 3 and 12), the requested study is to serve as a basis (i.e., a planning study as mentioned on the cover of the report) for a future zoning plan. It is now unclear what the government considers the zoning plan to be and it is unclear whether the Oostpunt Study serves a basis for a future zoning plan (as stated in the ToR) or whether the Oostpunt Study is in fact the actual zoning plan (as stated during the presentation of Wolff and Langan on 30 October 2012).

**Different versions of the ToR might have been provided to Wolff and Carmabi**

The ToR referred to in the Oostpunt Study (“Terms of Reference, Planning Study for the Development of Eastpoint Curaçao,” Executive Council of the Government of Curaçao, 21 September 2010) is different from the ToR provided to the NGOs on the island; the ToR provided to NGOs was dated 28 September 2010, a full week later than the date of the ToR referenced in the Oostpunt Study. It is unclear if both versions are the same.

**The Oostpunt Study is not the “impact study” requested in the ToR**

The ToR states that the Government seeks to “investigate the consequences of development” on Oostpunt (p. 3), but the consequences of development on, for example, nearby reefs is not included in the Oostpunt Study. The ToR states that the impacts of the proposed development scenarios will serve to inform the creation of the zoning plan for the Oostpunt area (p. 3). However, nowhere in the Oostpunt Study are the impacts or consequences of the proposed development scenarios considered in detail. Therefore, the Oostpunt Study prepared by Wolff, Langan, and EcoPlan does *not* qualify as Deliverable 3 of the Phase I deliverables, as requested in the ToR, which requires the study to consider: “the impact on the environment and ecological

systems of the land use as described in the two scenarios.” (Note: Strangely enough, for Deliverable 2, the ToR requests the investigation of 3 development scenarios; see p. 12 of the ToR. Therefore, even the number of development scenarios to be considered is unclear within the ToR). Furthermore, the ToR states that the planning study “should address planning-, ecological- and environmental issues” (p. 3). This is specifically mentioned in the ToR (p. 3), where it is called an ‘impact study’ that will underlie the preparation of a zoning plan. This is reiterated on page 12 (“Output and Deliverables”). Clearly, the investigation of “impacts” as requested in the ToR has been skipped; no reliable or thorough information in this regard is provided in the Oostpunt Study. Natural elements of the area are described (albeit superficially at best), but the effects of the proposed developments are nowhere discussed. Therefore the Oostpunt Study is not an impact study as requested in the ToR.

### **Wolff et al. overstate the size of their dataset**

Wolff, Langan, et al, write in the Executive Summary of the Oostpunt Study, in the “Proposed Zoning Plan” section that, “Only when the environmental and ecological features were understood, and after articulation of Environmental Principles and Development Objectives, did the planning team begin work on a preliminary Zoning Plan.” Given the size and complexity of the Oostpunt terrain, three short field visits (8-11 February, March 26 and April 2; all in 2011), by three different firms, totalling only 10 person days (as stated during the public presentation), are not sufficient to collect the information required to understand Oostpunt’s environmental and ecological features, especially since published information was only superficially included in the resulting study. Wolff, Langan, et al. thus failed at collecting sufficient and appropriate data and information to correctly assess the impacts of the proposed developments.

### **Effects of development on coral reefs are not considered**

The proposed development of Oostpunt (independent of scenario) poses a serious threat to the coral reefs that are of crucial importance to the future of Curaçao’s entire marine ecosystem. The proposed development along the southwest shore of Oostpunt should be rejected outright because it would, without a doubt, severely damage the coral reefs directly adjacent to the Oostpunt terrain.

Regarding coral reefs, the EIS prepared by KPMG is seriously deficient and inadequate. It shows complete failure to understand the impacts of the proposed development on Curaçao’s best reefs.

A small number of potential concerns are inaccurately described and superficially glossed over at best. Most potential concerns are ignored completely.

During their public presentation (30 October 2012), representatives from Wolff and Langan stated that coral reefs at Oostpunt were not investigated in situ, via snorkelling or diving, but rather through “inspection” from shore. Such a procedure is laughable and clearly unsuitable to assess the presence and state of Oostpunt’s coral reefs.

During their public presentation (30 October 2012), representatives from Wolff and Langan stated that coral reefs were similar around Curaçao’s whole southwestern shore and therefore Oostpunt’s reefs did not differ from those elsewhere on the island. (This was met with audible laughter from the audience.) We disagree with this statement and possess sufficient information (which we have already made available to Wolff) to unequivocally show the healthy state of Oostpunt’s reefs relative to the rest of Curaçao. Furthermore, we have sufficient evidence to show that the healthy state of Oostpunt’s reefs is extraordinarily rare across the entire Caribbean basin.



Photograph of a small section of reef near Oostpunt. These reefs were rated amongst the best remaining in the entire Caribbean in a recent (freely available) IUCN report.

([https://cmsdata.iucn.org/downloads/caribbean\\_coral\\_report\\_jbcj\\_030912.pdf](https://cmsdata.iucn.org/downloads/caribbean_coral_report_jbcj_030912.pdf))

The ToR nowhere states that the scope of the requested study is limited to the land of Oostpunt. Therefore the effects of development on, for example, coral reefs should have been included given the common knowledge that coastal development causes measurable coral reef degradation. Similar concerns can be raised for other impacts on and functions of ecosystems on land and in the ocean, most of which are not discussed or even included in the Oostpunt Study (e.g., effects of light on migratory birds, nursery functions of inland waters, sea turtle nesting grounds on beaches, effects of construction and habitat fragmentation on endemic flora and fauna, etc; see more on this below). The Oostpunt Study thus fails to include essential and known aspects of Curaçao's ecosystems that occur in the Oostpunt area and it does not describe the impacts on these systems/species that can be expected from the proposed development scenarios (Again, Deliverable 3 of the Phase I deliverables requires investigation of: "the impact on the environment and ecological systems of the land use as described in the two scenarios.") The ToR mentions and overviews the exceptional coastal/marine ecosystems in the Oostpunt area (469 word section on pp. 8-9), but the paragraph dealing with the description of the area's terrestrial ecosystems is extremely short (261 words in total on p. 9). Given that the ToR describes the marine/coastal ecosystems of Oostpunt in great detail relative to area's terrestrial ecosystems, it remains unclear why the impact of the proposed development at Oostpunt on such ecosystems

was not considered in the Oostpunt Study. Again, the ToR nowhere states that the scope of this study is limited to the land of Oostpunt. Claims that the Oostpunt study should only focus on land (as conveyed by the Oostpunt planning committee during the public presentation in October 2012) are, again naive at best, as proper zoning plans should include potential effects on all ecosystems present and in the ToR they frequently mentioned the uniqueness of coral reefs in this area which contradicts their later statements that these systems should not be considered.

In the ToR, the Government acknowledges the importance of coral reefs by stating “Curaçao is renowned for its coral reefs which make it an excellent spot for scuba diving” (p. 7). Furthermore, they mention the Underwater Park which lies along the southwestern shore of Oostpunt: “...the Underwater Park, which is famed for its incredible underwater scenery... is a prime location for scuba diving” (p. 8). They also acknowledge the fact that tourism and coral reef degradation are related: “Some of the coral reefs have been affected by tourism” (p. 7). Given these concerns as stated by the Government, it is surprising that the effects of near-shore development of Oostpunt on nearby coral reefs are not considered in the Oostpunt Study, especially since the study is specifically required to address “planning-, ecological- and environmental issues” (p. 3 of the ToR) and nowhere in the ToR is it stated that the scope of this study is limited to the land of Oostpunt. Based on the information provided in the ToR alone, Wolff, Langan, et al. could have already known of Oostpunt’s exceptional reefs and the fact that tourism negatively affects them. Nevertheless, they did not consider or even mention such effects in their study despite the fact that the ToR states that the area must be developed “capitalizing on the natural beauty of the land with a focus on sustainability” (p. 12).

### **The ToR contains insufficient information to conduct the requested study**

Most information provided in the ToR is irrelevant to the goals it aims to achieve. Much of the information provided focuses on general aspects of the history, culture and nature on Curaçao as a whole, but fails to provide a framework for the study it requests. For example, the general description of the island covers four pages in the ToR, whereas the description of Oostpunt covers no more than half a page (p. 9) and only offers general information, largely focusing on the history and functions of the old plantation house Klein Sint Joris. In other words, little information is provided about the area’s ecosystems, especially those on land, which would be affected by the proposed development of the area. The ToR does not provide sufficient information to Wolff, Langan et al. to successfully conduct their components of the study/assessment.

## **Justification for the various development scenarios (45, 55 and 60%) is lacking and alternative scenarios were requested but not considered**

On page 12, the ToR mentions a phased-approach to determine which of two proposed scenarios will be most suitable to develop Oostpunt. In the Oostpunt Study, a new plan is presented. It is unclear where the option to develop a new plan is included in the ToR. Furthermore, it is unclear why interested parties are asked to investigate two development scenarios, i.e., development of 45% and 55% of the area (p. 10 of the ToR, “objective and basic principles”), while they are also asked to deliver the results of another study including a 60% development scenario (p. 12, “output and deliverables”). It is unclear on what grounds the 60% scenario was added and why 45% and 55% development of the area were chosen to begin with. These seemingly arbitrary percentages cannot be a priori defined without information as to whether the area could withstand such level of development in a sustainable manner as requested in the ToR.

The objective of the Oostpunt Study as described in the ToR (p. 10) is to “carry out an analysis of the planning, environmental and ecological impacts of two scenarios of projected development of Eastpoint,” i.e., to investigate the two scenarios whereby 45% or 55% of the area is developed. As reported by Mirto Murray to AMIGOE, the selection of 45% and 55% follows from an agreement between Curaçao and the Maal family (p.10 of the ToR, as stated by Mirto Murray, AMIGOE, 30 October 2012):

*Because the Maal heirs strived for development of at least half of the entire area, the government agreed under the strict conditions this is possible based on studies from reputed experts into the economic impact and the impact on the environment and the nature. The agreements included that if the studies showed only 20% of the area could be developed because of the too large impact on the nature, parties would invite a decision through arbitration on the additional claim to be paid by the government.*

Concerns about these percentages were voiced by Carmabi during a stakeholders meeting in February 2011 at the DROV offices and additional information was requested concerning how these numbers were produced. Furthermore, the proposed Oostpunt Study, then assumed to be an environmental impact study rather than a planning study and zoning plan, should have included all potential levels of development, i.e., between 0% and 100%, awaiting a study describing the carrying capacity for the new functions of the Oostpunt area. Both Wolff et al. and the Oostpunt

planning committee mentioned that levels of development other than the 45% and 55% scenarios were indeed possible.

Email from Ted Wolff to Carmabi (16 February 2011): *I also understand that yesterday Donald dePalm sent you a section of the agreement with the Maal family so that you can see that this study won't be a study just focused on the 3 scenarios. We are obliged to study the 3 scenarios, but will not be able to recommend any scenario, at any level of development, if it has unacceptable ecological or environmental impacts.*

Email from Donald dePalm (11 February 2011): *Dear Mr. Stokkermans, I don't understand the confusion. As mentioned in the TOR they have to make recommendation for a development of 45%, 55% or more than 60%. Depending on the study results and recommendations other scenarios can be possible. You can't say in advance which scenario will be the best possible scenario. The outcome of the analysis has to determine that. Please contact me if some clarification is needed.*

Clearly, despite guarantees that “other scenarios” would be considered whereby the level of development would depend on the amount of unacceptable ecological or environmental impact, none of these alternative scenarios were considered in the Oostpunt Study, nor were the ecological and environmental impacts assessed or in any way appropriately considered.

### **Objections and appeal procedures are possible according to the ToR, but denied by the Eastpoint committee**

On page 12, the ToR states that “the selected firm will support the objection and appeal procedures against the proposed zoning plan, according to the local legislation, which includes the preparation of responses to each and every objection and appeal, and advice to the relevant authorities according to the local legislation about the decision on the objection and appeal.” During the presentation of Wolff, Langan, et al.’s Oostpunt Study on 30 October 2012, representatives of the government stated that citizens and/or stakeholder groups would not be allowed to formally appeal or protest the proposed plans, but rather could only provide “viewpoints.” It then became unclear how to officially/formally file objections to the proposed plan for Oostpunt and if such possibility existed at all. Nevertheless, given the aforementioned section from the ToR, such procedure should be possible.

**The selected firms lack the experience/expertise requested in the ToR**

Wolff et al., (i.e., Wolff Landscape Architecture Inc., Ecoplan Inc., and Langan International LLC), having been awarded the Government contract to conduct the Oostpunt Study, are expected to have fulfilled, amongst others, the following criteria: (1) Have knowledge and international experience with planning of large scale mixed use developments and master planning; (2) Be international reputable firms with experience in planning and design of large-scale, new, mixed-use development, including projects with an international character as well as work in the Caribbean; and (3) Have knowledge of and experience with zoning plan legislation in The Netherlands Antilles and/or The Netherlands, or have an association with a law firm specialized in zoning plan legislation in The Netherlands or The Netherlands Antilles. Based on the web-based portfolios of all companies mentioned, only Langan has ever worked near a coral reef, though these areas (e.g., Paradise Island, Miami) are home to already-degraded reefs, none which are remotely similar to those found on Curaçao. None of these companies, again based on their web-based portfolios, has ever worked on a project the size of Oostpunt nor do they have experience with zoning plan legislation in the Netherlands or former Netherlands Antilles. Hence, the requirements outlined above remain largely unfulfilled by the hiring of Wolff Landscape Architecture Inc., Ecoplan Inc., and Langan International, LLC.

**Ted Wolff has been associated with persons convicted for real estate scams at Oostpunt**

Ted Wolff, head of Wolff Landscape Architecture, Inc., had involvement with an earlier attempt to develop Oostpunt by Jan van Vlijmen, who was the main defendant in the biggest Dutch fraud trial ever, and who has been sentenced to four years in jail after being convicted of forgery, money laundering and bribery (see: <http://m.rnw.nl/africa/node/110329>). This raises suspicion as to whether Wolff et al. were selected solely because of their “expertise” or because of their involvement in earlier real-estate scams planned for Oostpunt.

## Curaçao

# Cel voor man achter plannen Oostpunt

Van onze correspondent

WILLEMSTAD/HAARLEM - De Nederlandse zakenman Jan van Vlijmen, die grootse plannen had met Oostpunt, verdwijnt voor vier jaar achter de tralies.

De rechtbank in Haarlem veroordeelde hem daar gisteren toe vanwege zijn leidende rol bij een vele tientallen miljoenen euro's omvattende fraude met projecten in de Nederlandse vastgoedsector. De investeringen op Curaçao waren bedoeld om de winsten van de opleidingspraktijken wit te wassen.

Van Vlijmen was in onderhandeling met grootgrondbezi-

ter Willy Maal toen hij eind 2007 in Nederland met dertien medeverdachten werd gearresteerd. Op dat moment lagen bouwtekeningen en artists impressions klaar van de golfresorts, villawijken en jachthavens, evenals een eigen vliegveld, energiecentrale, station, paardenrenbaan, dierentuin en musea. Totale investering: 400 miljoen. De journalisten Vasco

van der Boom en Gerben van der Marel van het Financieele Dagblad wijdden in hun boek 'De vastgoedfraude' een apart hoofdstuk aan de Curaçaoese avonturen van Van Vlijmen. Daarin figureren naast Maal onder meer ook Rudolf Meurs van het adviesbureau Acenco, de op Bonaire actieve vastgoedman Gerrit Tjihuis en FOL-leider Anthony Godett.

Advertentie

## BULA WAYA

## Platina

Het is nog steeds wonderlijk dat wij op Curaçao niets van de kredietcrisis merken.

Althans, als ik zo om me heen kijk. Het woord wordt nauwelijks in de

mond genomen en als CBS aankomt met negatieve cijfers, dan zijn dat gewoon negatieve cijfers. Niets meer dan dat.

Enkele bankdirecteuren wisten het wel te verklaren een tijd geleden. Die stelden dat hun sector niet veel last van de wereld had, omdat ze



nog net geen calvinistisch vingertje op. Uber-

Curaçaoënaar: En natuurlijk weet ik dat er andere festivals zijn die een bom duiden kosten.

Maar dat nou juist het

Tumbafestival zoveel onderscheid maakt tussen mensen: dat vind ik teleurstellend. Nog even los van het feit dat ik een klassensysteem echt niet meer van deze tijd vind. In een tijd dat we allemaal zo graag één zijn en één land willen vormen, doen we ons best om juist

Antilliaans Dagblad newspaper article (28 January 2012) reporting on the sentencing of an earlier collaborator of Wolff who was convicted of real estate fraud.

## The report is incomplete

The Oostpunt Study neglects and/or lacks crucial information on the presence and workings of species and ecosystem types typical for Curaçao. Examples include, but are not limited, to: the impacts of storms, nesting beaches and sea turtles, the nursery function of inland bays, endemic species, and critically endangered species (e.g., elkhorn corals). Another example of the myopic nature of this report is that Wolff et al. in the Oostpunt Study list 18 species for the area in total whereas Oostpunt harbours 69 bird species alone. The study is hence incomplete, and as such, unsuitable to be used for further planning purposes.

## The infrastructure section of the Oostpunt study is not mentioned in the ToR and can as such not be judged for its validity as conditions/ terms are unknown

Strangely enough the ToR states: "One of the studies will address planning-, ecological and environmental issues (the Planning Study) and the other study will address financial, social, socio-economic, macro-economic and infrastructural aspects of the development of Eastpoint Curaçao (the Economic Impact Study)." If this sentence describes the requested deliverables, how is it then possible that the infrastructural aspects were included in the first study, i.e., the one addressing ecological, environmental and planning issues? Again, the study fails to produce the deliverables requested in the ToR.

## **The infrastructure section of the Oostpunt study is full of omissions and wrong assumptions**

While this section falls outside Carmabi's direct expertise, we were able to find various examples on how the producers of the infrastructural section of the Oostpunt study made wrong assumptions or simply "forgot" to include crucial information in this section of the report. Examples include, but are not limited to the following: (1) The report states: "Aqualectra appears to have a significant supply of electricity (both now and in the near future with planned expansions) for the country. Aqualectra indicated that they have the ability and willingness to service the future development of the Eastpoint property with electrical power." As Aqualectra is already unable to provide sufficient electricity to the island at present, additional capacity is needed to accommodate future developments at Oostpunt. Assumptions as those mentioned above are simply naïve given the above. Therefore the study requires additional and more detailed studies to determine how and at what cost the additional infrastructure required to provide Oostpunt with the required energy can be constructed. The same goes for assumptions regarding the possibility to treat the sewage produced by the planned/ proposed developments at Oostpunt. At present much sewage is directly discarded in the ocean illustrating that the capacity of sewage treatment facilities is already too low with the existing situation, let alone if more houses/ hotels are connected to these existing, undercapacitated systems. (2) Calculations on future water use do not include landscaping and as such are underestimated in the Oostpunt study. (3) Regarding the electrical aspects of the study, the authors mix various concepts or do not distinguish between standard methods to calculate electrical demands (e.g., piekverbruik, verbruik, aansluitvermogen). Lamely, the authors conclude "The future developer will need to re-evaluate these assumptions based on more accurate baseline data, the actual development plan, and more accurate projections of demand based on the actual development plan.", Obviously, the study lacks all required detailed to make informed decisions on the feasibility of the proposed development at Oostpunt in terms of electrical requirements. (4) The calculations on waste production are solely based on numbers provided by Selikor. As such, other forms of waste (e.g., construction waste, garden waste) are currently not included in estimates of the amount of waste that will be produced. (5) The number of people travelling from the airport is underestimated by a factor 2 as the authors do not consider the fact that 1 visitor has travel back and forth between Oostpunt and Hato. These are simply a few examples aimed at illustrating that the assumptions and information used for the infrastructural section of the Oostpunt study is below standards required to determine whether the proposed development is economically and/ or practically feasible.