

# Strategic Environmental Assessment and LNG in the Gulf of California

Defensa Ambiental del Noroeste and the Center for Biological Diversity



Inscribed on the World Heritage List in 2005 for its Outstanding Universal Value (OUV), the Islands and Protected Areas of the Gulf of California are recognized for exceptional marine biodiversity and critical habitats for endangered and migratory species. Despite repeated calls by the World Heritage Committee for a **precautionary approach**, the property is facing increasing pressure from a range of large-scale liquefied natural gas (LNG) projects and associated infrastructure, at a time when the site is already under acute stress due to the conservation crisis of the vaquita marina.

These LNG projects — including Saguaro LNG, Vista Pacifico LNG, and AMIGO LNG<sup>1</sup> — together with associated pipelines and increased large-vessel traffic, form an emerging, functionally integrated gas export corridor linking Texas, the Gulf of California, and Asian markets, with impacts extending beyond individual project footprints. Public statements by the project proponent indicate an intention to cancel the Vista Pacifico LNG project. However, at the time of writing, no administrative resolution concluding the federal environmental impact assessment procedure is publicly available.

To date, international attention has largely focused on species-specific measures for the vaquita marina<sup>2</sup>, while broader cumulative and systemic impacts associated with LNG development and increased shipping across the property and its wider

setting have not been comprehensively assessed. Environmental reviews remain fragmented and project-based, and the absence of a Strategic Environmental Assessment (SEA) raises serious concerns about the compatibility of large-scale industrialization with the property's integrity and World Heritage status<sup>3</sup>.

## Need for Strategic Environmental Assessment: key concerns

Although UNESCO has engaged Mexico, the United States and China extensively on the conservation crisis of the vaquita marina, including through repeated Committee decisions calling for urgent action to prevent the species' extinction<sup>4</sup>, this focus has had the effect of narrowing the scope of analysis concerning threats to the World Heritage property. While the vaquita is geographically concentrated in the Upper Gulf, the proposed LNG export corridor bisects the Mid- and Southern regions of the property, creating a systemic threat to its functional integrity.

The impacts associated with LNG infrastructure — such as increased ship strikes, underwater noise pollution, ballast water discharge, light pollution, habitat fragmentation, and greenhouse gas emissions — have not been comprehensively evaluated in relation to the property's OUV. Yet, the World Heritage Committee has consistently affirmed that threats arising outside

the boundaries of a property, including in its wider setting, must be assessed when they have the potential to affect OUV<sup>5</sup>. In this context, the current situation represents a “potential danger” to the OUV as per Paragraph 180 of the Operational Guidelines. Specifically, the increase in large-vessel transits introduces chronic acoustic masking and lethal strike risks across primary migratory and feeding corridors for the 34% of the world's marine mammal species that constitute a key attribute of the property.

In this case, an SEA is indispensable to evaluate cumulative, regional, and long-term impacts that cannot be captured through individual project-level assessments. Such assess-



Fig. 1: LNG terminals can extend far into the open sea and destroy large extents of natural coastline.

Photo: Gulf Development Public Company Ltd.

ments must be elevated to a Heritage Impact Assessment (HIA), in accordance with the 2022 UNESCO Guidance and Toolkit, to ensure that the integrated gas corridor is evaluated as a single functional threat rather than as a series of isolated projects.

Additionally, while concerns have been expressed by UN human rights mandates<sup>6</sup> and IUCN<sup>7</sup>, LNG projects and increased shipping continue to advance without adequate consideration of World Heritage requirements. At the same time, affected coastal and Indigenous communities have not been meaningfully consulted in line with international standards, undermining participatory principles and the overall credibility of the assessment process<sup>8</sup>.

Need for urgent World Heritage Committee attention

Given the rapid advancement of LNG projects and the scale of their potential impacts, there is an urgent need for this case to be placed on the World Heritage Committee’s agenda as a matter of priority. The property’s status on the List of World Heritage in Danger is predicated on the State Party’s ability to implement corrective measures. The introduction of a new, large-scale industrial threat — unaccounted for in the Desired State of Conservation for the removal of the property from the List — fundamentally undermines these efforts.

Despite prior Committee decisions calling for robust, internationally consistent impact assessments<sup>9</sup>, recent approvals and public statements suggest a weakening of environmental review processes. In this context, presidential assertions that the

Saguaro LNG project presents no irregularities<sup>10</sup> — notwithstanding the existence of several ongoing constitutional lawsuits<sup>11</sup> —and that permits for the AMIGO LNG project are expected to be issued in the near term, with construction anticipated shortly thereafter<sup>12</sup>, could be perceived as prejudging ongoing judicial processes and undermining confidence that World Heritage Committee and UN concerns will be addressed in good faith.

Update to the property’s Statement of Significance and Integrity

Since its inscription in 2005, the **Islands and Protected Areas of the Gulf of California** have been celebrated as a “natural laboratory” of global importance. However, the property’s OUV is no longer solely threatened by localized illegal fishing. It now faces a transformative industrial shift. The proposed emergence of an integrated LNG corridor represents a “Potential Danger” under §180 of the Operational Guidelines, as it threatens to fundamentally alter the ecological and acoustic integrity of the marine environment that supports the site’s biodiversity (Criteria ix and x).

The cumulative scale of these projects — encompassing terrestrial terminals, transboundary pipelines, and an unprecedented surge in ultra-large vessel traffic — constitutes a change in the state of conservation that has not been evaluated by the World Heritage Centre. This industrialization is occurring in the absence of a SEA, leaving the Committee without the necessary data to determine if the property can still maintain its OUV under these new conditions.

| World Heritage Criterion                                           | Key Attributes of the Property                                                                        | Projected Impact of LNG Corridor & Shipping                                                                                                                          |
|--------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Criterion (vii):</b> Exceptional natural beauty                 | Pristine “desert-meets-sea” landscapes; high water clarity; minimal light pollution.                  | <b>Visual &amp; Light Pollution:</b> 24/7 industrial flare stacks and terminal lighting; presence of ultra-large carriers disrupting the wilderness character.       |
| <b>Criterion (ix):</b> Ongoing ecological and biological processes | “Natural laboratory”; critical upwelling zones; primary productivity supporting massive biodiversity. | <b>Acoustic Masking:</b> Chronic underwater noise from turbines and engines interfering with the communication/navigation of 30+ marine mammal species.              |
| <b>Criterion (x):</b> Conservation of biological diversity         | Habitat for 34% of the world’s marine mammals; migratory corridors for Blue and Fin whales.           | <b>Lethal Strike Risk:</b> High-frequency vessel traffic crossing narrow migratory bottlenecks; habitat fragmentation from “industrial noise walls.”                 |
| <b>Integrity &amp; Management</b>                                  | Connectivity between protected islands and marine zones; absence of heavy industrialization.          | <b>Functional Fragmentation:</b> The “Integrated Gas Corridor” bisects the property, creating a permanent industrial barrier between the Northern and Southern Gulf. |

Fig. 2: Key attributes of the (OUV) of the **Islands and Protected Areas of the Gulf of California** and their functional connectivity across the property and its wider setting.

Given that the property is already on the List of World Heritage in Danger, the threat posed by LNG infrastructure is not a peripheral concern but a direct obstacle to the site's recovery. *Therefore, we formally call upon the World Heritage Centre, in consultation with IUCN, to urgently request the invitation of a Reactive Monitoring Mission to the property.* This mission is essential to assess the compatibility of these large-scale industrial developments with the World Heritage status and to evaluate whether the current "Corrective Measures" remain sufficient considering this regional industrial transformation.

In conclusion, the **Islands and Protected Areas of the Gulf of California** World Heritage property stands at a critical juncture. It is inherently inconsistent to focus international efforts on the removal of illegal gillnets in the north while simultaneously permitting a permanent, high-impact industrial corridor to be established through the heart of the property. The absence of a SEA, combined with inadequate public and Indigenous consultation, threatens the property's OUV and warrants timely consideration by the World Heritage Committee to prevent irreversible harm.

## Notes

- 1 LNG ALLIANCE (2026). Amigo LNG. <https://www.lngalliance.com/projects-7>; MEXICO PACIFIC (2026). Saguaro Energy <https://mexicopacific.com/saguaro-energia/> and Sierra Madre pipeline. <https://mexicopacific.com/es/gasoducto-sierra-madre/>; Semptra Infrastructure (2026) <https://semprainfraestructure.com/es/que-hacemos/gnl/>
- 2 UNESCO World Heritage Committee. (2017). Decision 41 COM 7B.19. Paris; UNESCO World Heritage Committee. (2019). Decision 43 COM 7B.21. Paris.
- 3 UNESCO. (2023). Operational guidelines for the implementation of the World Heritage Convention. Paris: UNESCO World Heritage Centre, para. 118 Bis.
- 4 UNESCO World Heritage Committee. (2017). Decision 41 COM 7B.19. Paris; UNESCO World Heritage Committee. (2021). Decision 44 COM 7B.24. Paris.
- 5 UNESCO World Heritage Committee. (2015). Decision 39 COM 7. Paris; UNESCO World Heritage Committee. (2025). Decision 47 COM 7A.5. Paris.
- 6 UN Special Procedures mandates, including the Special Rapporteurs on climate change, cultural rights, the right to development, the human right to a clean, healthy and sustainable environment, health, the rights of Indigenous Peoples, and water and sanitation, as well as the Working Groups on business and human rights and on the rights of peasants and rural workers. See AL MEX 4/2025 (2 September 2025) available at: <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=29862> (Spanish only). Additional information was requested from the Governments of the United States and Singapore and from the companies proposing the projects. See USA 12/2025, available at: <https://spcommreports.ohchr.org/TmSearch/RelCom?code=USA%2012/2025> (Spanish only).
- 7 IUCN, Motion 031, Protecting the Gulf of California World Heritage Sites of Mexico from industrialisation for liquefied natural gas development (24 Sept. 2025), <https://iucncongress2025.org/assembly/motions/motion/031>
- 8 For example, local communities formally requested the opening of public participation proceedings on 10 October 2024 for the Vista Pacífico LNG project. To date, more than one year later, no such proceedings have been initiated, effectively preventing affected communities from exercising their right to participate in environmental decision-making. See UNESCO. (2023). Operational guidelines for the implementation of the World Heritage Convention. Paris: UNESCO World Heritage Centre, paras. 12 & 40.
- 9 UNESCO World Heritage Committee. (2025). Decision 47 COM 7A.5. Paris.
- 10 Sheinbaum, Claudia (2025, December 1). Statement during the morning press conference ("mañanera") [Video]. YouTube. [https://www.youtube.com/watch?v=85Aen\\_Uun0s](https://www.youtube.com/watch?v=85Aen_Uun0s) (2:14:10–2:33:35). (Author's own translation from Spanish): Referring to the Saguaro Project, the President stated that it is "an interesting project," that "there are no irregularities," and that "an environmental impact assessment has already been approved by SEMARNAT, but authorities are reviewing the number of vessels that would enter in order to avoid impacts on the Gulf of California. The Ministry of Energy (SENER) is assessing whether an additional gas pipeline would be required."
- 11 To date, **eleven** constitutional lawsuits (amparos) remain pending in relation to the Saguaro LNG project and the associated STGN Sierra Madre Gas Pipeline.
- 12 Sheinbaum, Claudia (2026, February 2). Statement during the morning press conference ("mañanera") [Video]. YouTube. <https://www.youtube.com/live/xDJqrsX88pk?t=6391s> (1:46:35–1:48:17). (Author's own translation from Spanish): "(...) in Guaymas there is a very significant investment announced by President López Obrador: a natural gas liquefaction plant. It had not been possible to move forward because a segment of the gas pipeline from Hermosillo to Sonora was missing. SENAGAS will now build it; all permits are already in place, and construction will begin in one month." Sheinbaum, Claudia (2026, April 8). Statement during the morning press conference ("mañanera") [Video]. YouTube. [https://www.youtube.com/watch?v=EnLBv\\_AzIzg](https://www.youtube.com/watch?v=EnLBv_AzIzg) (1:17:38–1:17:41). (Author's own translation from Spanish): "(...) and the [LNG liquefaction terminal] project in Guaymas is expected to be approved soon."