

To whom it may concern,

The aim of this letter is to explain why the IUCN SSC Primate Specialist Group ARRC Task Force will not be engaging with the Société des Mines de Fer du Nimba (SMFG) iron ore mining project in Guinea. The IUCN SSC Primate Specialist Group ARRC Task Force is comprised of the world's leading ape conservation experts, and is convened with the goal of providing advice about avoidance, reduction, and restoration of the negative impacts of energy, extractive and associated infrastructure projects on apes, and generating recommendations for ways that companies can contribute positively to ape conservation. The most recent Guidance Note for the International Finance Corporation's Performance Standard Six advises projects that have the potential to impact great apes to consult with the Section on Great Apes (SGA) of the IUCN SSC Primate Specialist Group to align with best-practice standards in great ape conservation. As such, the Task Force is committed to working with lending institutions and companies to minimize the impacts of development and private sector projects on apes through avoidance and mitigation.

However, after discussion and consultation with the ARRC Task Force Steering Committee, IUCN's World Heritage Programme, UNESCO and the UNEP Great Ape Survival Partnership, including discussions with Jamison Suter and Guy Parker of the SFMG project, the Task Force agreed that we will not be able to engage with this project for reasons explained below.

Much of Mt. Nimba is designated as a World Heritage Site and IUCN is the official Advisory Body to the World Heritage Convention for natural (and mixed) sites. As we are a subgroup of an IUCN Commission, it is especially important that we act in accordance with the World Heritage Convention and IUCN's policies on World Heritage sites. The World Heritage Convention's *Operational Guidelines*, numerous World Heritage Committee decisions and IUCN policy have consistently concluded that industrial extractive activities should not occur in World Heritage sites, nor should activities occurring outside site boundaries negatively impact the Outstanding Universal Value of a World Heritage Site. In addition, it is established IUCN policy that it is not acceptable to attempt to offset impacts to World Heritage sites. We note that the IFC takes a similar stance, "GN54. Based on the mitigation and management requirements of paragraph 17 of PS6, some areas will not be acceptable for financing... They include UNESCO Natural and Mixed World Heritage Sites; Sites that fit the designation criteria of the Alliance for Zero Extinction (AZE)¹⁰."

Given that the proposed SMFG project is in an enclave in a World Heritage Site, and based on the technical expertise of the Task Force working on mitigating impacts of mining projects on chimpanzees, and conducting long-term behavioral studies of chimpanzees in this region and elsewhere in Guinea, we believe that it is highly unlikely

that this project would be able to avoid significant negative impacts (especially indirect impacts) on chimpanzees in the Mt Nimba World Heritage Site.

We have been developing our procedures and methodology for how the ARRC Task Force engages with industries. Through discussions both internally and with multiple stakeholders, it has become evident that we need to have clear guidelines that define and limit which projects we can engage with and those we should not. Our policy is to have an initial call with all companies whose activities potentially impact great apes, and then after doing our due diligence, determine whether or not to “Engage” with a project. For those projects that we judge will negatively impact directly or indirectly the “Outstanding Universal Value” of a World Heritage Site, we do not engage.

Please find our official statement attached and do please let us know if you have any questions – we would be happy to respond.

Sincerely,

Rebecca Kormos

Rebecca Kormos, on behalf of the IUCN SSC PSG SGA/SSA ARRC Task Force Steering Committee



Statement from the ARRC Task Force

August 4, 2020

To whom it may concern,

This letter acknowledges that the ARRC Task Force of the IUCN SSC Primate Specialist Group, Section on Great Apes and Section on Small Apes, has been contacted by Société des Mines de Fer du Nimba (SMFG) iron ore mining project in Guinea. Jamison Suter and Guy Parker have presented preliminary information to us about the project.

We understand that the project is in the process of finalizing its Environmental and Social Impact Assessment. Based on our experience working on similar projects, on our understanding of chimpanzees' responses to mining impacts, on the fact that the project is enclaved within the Mt Nimba World Heritage Site and that chimpanzees range both within the SMFG permit and inside the World Heritage Site of Mt Nimba, we foresee unavoidable negative impacts on the Critically Endangered chimpanzees of Mount Nimba from this project. Therefore, in accordance with IUCN policy, we will not formally engage with SMFG on this project. Please see our website regarding our no-go zones policy and please do not hesitate to contact us if you have further questions.

Sincerely,

Rebecca Kormos

Dr Rebecca Kormos, on behalf of the ARRC Task Force of the IUCN SSC Primate Specialist Group