

IUCN SGA ARRC Taskforce Recommendations

Simfer is grateful for the willingness of the IUCN SGA ARRC Taskforce to consider re-engaging with us on the Simandou Project. We look forward to providing a more comprehensive update on our efforts at the end of this year. In the interim, we have prepared this document as a record of our commitment to embedding the SGA ARRC Taskforce's recommendations where possible.

Requirements for re-engagement	Rio Tinto Simfer response
Demonstrate the start of implementation of the most recent PdF Management Plan with the technical advisor	We recognise the urgency in delivering on these requirements to ensure the effective implementation of the PdF Management Plan. We are actively engaging our procurement and legal teams to ensure we can onboard a technical partner as soon as possible and secure the necessary equipment in a timely manner.
Secure all equipment for activities to be conducted for implementing the PdF Management Plan in its first year	
Complete one round of sensitization with the technical partner about the PdF Management Plan in all the relevant villages East and West of the PdF	
Award the contract for the monitoring of chimpanzees and other mammal species; and start collection of survey data on chimpanzees (especially urgent for Oueleba)	As of July 2024, the Scope of Work for the primate monitoring program has been updated to include the recommendations provided alongside best-practice guidelines and will be issued for tender. In the interim, the biodiversity team have secured additional monitoring cameras in order to intensify monitoring efforts around Oueleba and to provide improved adaptive management where appropriate.
Clarify indicators with thresholds to monitor activities and to apply adaptive management;	This will be considered and updated as part of the re-issue of the primate monitoring contract and updated programme.
Set-up a central database that includes all biodiversity data collected to date, which can be easily used to measure monitoring efforts against indicators;	This will be considered and updated as part of the re-issue of the primate monitoring contract and updated programme.
Start undertaking phenological studies along existing transect lines	We have taken this advice onboard, and the Botanical team will further support the implementation of the updated primate monitoring program.
Set up an emergency small fund for the environmental department that can be more quickly accessible and doesn't need to get approval for disbursement	An established process is in place that supports work related cash disbursements. It is not possible to create a separate fund as this would be contrary to Rio Tinto Ethics and Compliance guidelines for operating in Guinea.
Share chimpanzee survey data collected to date with the IUCN SSC A.P.E.S. database	We will share all chimpanzee survey data once our updated Mine and Rail Spur ESIA (Environmental and Social Impact Assessment) has been approved and published by the Government of Guinea.
Implement at least one alternative revenue generating project in a village located on the western side of the PdF;	Our livelihood restoration programme is ongoing across the Rio Tinto Simfer managed scope of the project.
Implement, in collaboration with local Guinean authorities, control posts for the main access roads along the Transguinean railway (for example in Kounoukan area where the railway access road is being heavily used by the local populations and is now also used to traffic charcoal coming from neighbouring forests).	Whilst construction and management of the main line rail is outside of the direct scope of Rio Tinto Simfer, our partners are in the process of implementing control posts along community areas to manage the use of access roads along the Transguinean railway and inside protected areas. We will support our partners to revisit these plans to ensure traffic of any nature is compliant with ESIA mandates.

General recommendations	Rio Tinto Simfer response
Pic de Fon Management Plan	
<p>We are now in the second iteration of the PdF Management Plan and there is still no technical partner and no proper implementation of the management plan. The technical partner needs to start as soon as possible, without delay. We noted frustrations among villagers which is a risk to the project and the effective implementation of the PdF Management Plan.</p>	<p>This is a critical component of our ability to properly implement the PdF Management Plan. We are currently working through our procurement process to onboard a technical partner as soon as possible.</p> <p>We are also exploring the onboarding of independent consultants to support the sensitisation of communities in local languages with support from the CFZ, COGEF, ACCM and COGRNTV.</p>
<p>Any community-level development plans need to be shared with the environmental team who should assess any potential risks that such projects could have in exacerbating negative interactions between chimpanzees (and other wildlife) and people, such as crop foraging. For example, any agricultural developments should take care not to attract wildlife species, including chimpanzees, to areas near villages.</p>	<p>We have begun engaging with our CSP (Communities & Social Performance) department more regularly to improve our collaboration and foster increased alignment in the implementation of community development programmes, especially when near areas of biodiversity significance.</p>
<p>A standardized system for grievances and complaints should be put in place that is well understood by all villagers around the PdF. This is in addition to the placement of a SIMFER community liaison officer in each village within the Aol to ensure a level of trust in communications between villagers and SIMFER.</p>	<p>A grievance mechanism is currently in place to record, investigate and promptly address concerns through a transparent and unbiased process. This mechanism was designed in consultation with the communities surrounding the operation, and its principles are regularly communicated to all project staff and local communities. The Simfer grievance mechanism is currently being evaluated through a Human Rights Impact Assessment to identify any gaps and ensure these are addressed as quickly as possible.</p>
<p>Any sign boards for the PdF should not include the Rio Tinto logo to avoid confusion as to who has management responsibility for the PdF.</p>	<p>We will take this recommendation into account and consider its removal.</p>
Monitoring	
<p>A clear state-pressure-response monitoring plan is needed, and indicators along with their thresholds should be developed by the environmental team using their knowledge of the area and the data collected to date.</p>	<p>Any expertise or recommendations around monitoring is welcome and will be considered and applied accordingly.</p>
<p>A central database is needed where data (including raw data collected by consultants) can be readily uploaded and accessed by the team to help with data quality control and to enable the team to produce monitoring and evaluation reports for adaptive management and reporting purposes.</p>	<p>This will be considered and appropriately updated as part of the re-issue of the primate monitoring contract.</p>
<p>Monitoring in PdF should be done in collaboration with CFZ, COGEF and the ACCM. Villagers involved require necessary equipment and a 'prise en charge' for the days worked. If not, the opportunity costs of participating in monitoring activities will outweigh the benefits to villagers and they will have little economic incentive to be involved. A sustainable system needs to be put in place by the technical partner to address this issue.</p>	<p>Collaboration is essential to ensure our monitoring efforts are successful. We would welcome the SGA's advice in establishing an effective and sustainable monitoring system.</p>
<p>It appears that hunters are familiar with the location of the line transects and are actively avoiding them. They may also be aware of when the CFZ is conducting a patrol. The CFZ needs to set up an additional 'mobile patrol', which could enter any location of the PdF at any time without the knowledge of local communities.</p>	<p>We will consider the application of this recommendation and engage the CFZ accordingly. We will also ensure the Pic de Fon technical partner becomes aware of these emerging challenges to implementation of the PdF MP.</p>
<p>All SMART data collected by CFZ should be shared regularly (e.g. monthly) with the environmental team as these will provide useful data for their monitoring activities, e.g. for the threat of hunting, artisanal and small-scale mining (ASM) and agricultural activities within the PdF, as well as bushfires. These will also serve as a way to monitor the effectiveness of the implementation of the PdF Management Plan (other data</p>	<p>We will approach the CFZ to identify avenues to share data more regularly and incorporate the findings into the PdF MP.</p>

and multiple indicators for the same threat will also need to be established).	
As long as Oueleba is the focus of construction and exploitation, monitoring of chimpanzees should be more intensified around this area with less intense monitoring in the rest of the PdF.	We will explore opportunities to intensify our monitoring efforts in and around Oueleba, both with our Biodiversity team and as part of the re-issue of the primate monitoring contract.
There is currently no baseline data for diana monkeys (<i>Cercopithecus diana</i>) or the King colobus (<i>Colobus polykomos</i>), although both species are Endangered and reported in the Aol of the project. We highly recommend that the project use arboreal camera traps to monitor these species. This will require an initial on-site training to show the team how to safely set up cameras and retrieve data.	Simfer presently uses camera traps across our Project footprint, and we are exploring partnership opportunities to complement these with specialised technology. We are also considering the practical application of arboreal cameras at Simandou, and welcome further recommendations about their safe and successful deployment.
There should be better collaboration between the fauna and flora teams to understand fruit phenology. Phenology surveys can be conducted along existing transects using traditional phenological approaches. We shared with the team a list of plants consumed by Bossou and Nimba chimpanzees, we hope this will be useful to the botanical team.	We will look for opportunities to enhance our collaboration efforts and also prioritise phenological studies. The Botanical team will utilise the information provided from Nimba to replicate a similar study at Simandou.
Concerning deforestation and bushfires, we also recommend that the environmental team remotely tests out the usefulness of the Global Forest Watch <i>Forest Watcher</i> application (available offline) that is able to provide real time data and an alarm system. However, please note that this application may not be appropriate because of limitations on spatial and temporal resolution, but it may be worth testing its potential utility. The CFZ could also be trained to use this application if deemed useful within the PdF context.	While we have used GFW before and continue to use it on an ad hoc basis, we have found that the resolution of the data to be too coarse to give early indication of deforestation and not a sufficiently high enough temporal resolution to mobilise fire response teams before a bushfire is well established. We have opted to pursue purchasing our own high resolution satellite data for analysis.
There needs to be careful interpretation of data. For example, the absence of chimpanzees on camera traps where they were previously recorded does not necessarily indicate that they have disappeared from the area. This will depend on the placement of the camera traps and camera trapping effort, but it could also be linked to i) seasonal patterns in chimpanzee movement and habitat utilization, ii) impacts of the project alone or iii) perhaps a combination of the two. Thus, it is critical to acquire a better understanding of chimpanzee behavioral ecology across seasons, altitudes and food availability.	This will be considered and appropriately updated as part of the re-issue of the primate monitoring contract.
We recommend the project sets up an independent advisory committee that conducts an annual review of the monitoring results and implementation of the PdF Management Plan, along with a site visit to provide recommendations as the project progresses.	For the implementation of the PdF MP, there will be a steering committee established to monitor the results and implementation (COPIL). We will consider your recommendation for a further independent committee.
Offsets and additional conservation actions	
The project will necessitate a large offset to compensate for all its impacts on chimpanzees (including the mine and all associated infrastructures). We encourage the project to be innovative in its approach to ensure the long-term conservation of chimpanzees in Guinea.	We have committed to following IFC PS6 (International Finance Corporation Performance Standard 6 on Biodiversity Conservation and Sustainable Management of Living Natural Resources) which involves achieving a Net Gain for any Critical Habitat Qualifying Species, which includes the Critically Endangered Western Chimpanzee (<i>Pan troglodytes verus</i>). This requires compensation of impact in the form of biodiversity offsets, which for Chimpanzees may involve, new protected areas/National Parks and their long-term funding. Work is currently underway with the Wild Chimpanzee Foundation (WCF) to understand the best locations for these sites through the RT-funded Guinea-wide Chimpanzee population assessment. This will lead into feasibility studies of appropriate sites, likely to commence in early 2025.

<p>The ARRC Task Force recommends having up-front, long-term funding that can support conservation programs in perpetuity.</p>	<p>We will consider this recommendation for application as part of the offset feasibility process.</p>
<p>We encourage the project to help build the capacity of Guinean primatologists through:</p> <ul style="list-style-type: none"> • Creation of a primatology institute that could provide graduate level opportunities and thematic training. • Paying scholarships for Guinean students to study the impacts of the Simandou mine on chimpanzees. For example, a study on the impact of noise on chimpanzees has never been conducted and it would be extremely helpful not only for the project to better manage their impacts, but also more widely to help improve the management of mining impacts on chimpanzees. 	<p>We would gratefully receive further information around the possible creation of a primatology institute and recommendations around how Rio Tinto Simfer can support this, especially opportunities for graduate-level Guinean students looking to further their field and research experience.</p>
<p>The project should support more initiatives for the conservation of chimpanzees in Guinea following the National Chimpanzee Conservation Plan and more broadly for the subspecies as a whole through support to the IUCN Regional Action Plan for the Conservation of Western Chimpanzees (which include relevant themes, e.g. private industry).</p>	<p>We will consider our position within the Action Plan and welcome further recommendations around supporting its application.</p>