



ARRC Task Force Statement of discontinuation of engagement with Sierra Rutile Limited, Sierra Leone

June 12, 2024

To whom it may concern,

The IUCN SSC PSG SGA SSA ARRC Task Force¹ was first contacted in 2020 by Sierra Rutile Limited (SRL) regarding its mining operations in Area 1 in Sierra Leone, located within the Critically Endangered western chimpanzee's (*Pan troglodytes verus*) range. The Area 1 project is a rutile (with ilmenite and zircon as by-products) mining operation located in the Bonthe and Moyamba districts in the southern province of Sierra Leone. The project is operated by SRL, which was at that time a subsidiary of Iluka Resources, and seeking funding from the International Finance Corporation (IFC). The ARRC Task Force was approached to assess the mining impacts on chimpanzees and provide advice to improve the mitigation of these impacts, in alignment with IFC Performance Standard 6 (PS6).

Since our last interaction with the project in February 2022 when we provided feedback on its Biodiversity Action Plan (BAP) and Biodiversity Monitoring and Evaluation Plan (BMEP) for Area 1, the ARRC Task Force has not received any revisions of these documents. The ARRC Task Force panel for this project clearly stipulated at the time that it would not be able to pursue any engagement until there was a more robust version of the BMEP.

Sembehun mineral sands mining project in Area 5

Meanwhile, SRL has submitted an Environmental, Social and Health Impact Assessment (ESHIA) to the government for its proposed operations in Area 5, the Sembehun mineral sands mining project. The ARRC Task Force has not been approached to advise on potential impacts of mining activities on chimpanzees for the Sembehun project, which would be required if the project would want to align with IFC PS6. After asking to see the ESHIA and reviewing it, we have concerns about the commitment of SRL to actually apply the mitigation hierarchy to minimize its impacts on chimpanzees. The development of the Sembehun project to the North of Area 1 involves the exploitation of new pits and the upgrading of a road which will be used to transport the extracted minerals to the processing facility located in Area 1. The presence of chimpanzees have been confirmed in the area where the pits are planned to be developed and there is chimpanzee evidence on both sides of the proposed hauling road which implies that the

¹ International Union for the Conservation of Nature (IUCN) Species Survival Commission (SSC) Primate Specialist Group (PSG) Section on Great Apes (SGA) and Section on Small Apes (SSA).

road upgrade risks creating a barrier to chimpanzee movement, reducing population connectivity and viability within the landscape.

We recommend that the project:

- Perform an alternative location analysis, highlighting evaluation of alternatives and rationale for its development plans.
- Complete more robust baseline surveys for chimpanzees accounting for the impacts of the project operations and of all its infrastructures, including the haul road. This will require surveys outside the project's permit to fully understand the extent of impacts on chimpanzees, as chimpanzees range on both sides of the road but their home range and abundance is unknown.
- Outline clearly in a BAP the project's direct and indirect impacts on chimpanzees and the mitigation measures that will be implemented to avoid and reduce these impacts, as well as develop a BMEP following a clear state-pressure-response monitoring framework, with appropriate indicators and thresholds that allow for adaptive management.
- Conduct a proper offset feasibility study to compensate for residual impacts on chimpanzees based on estimated abundance metrics, i.e. number of individuals. Rehabilitation actions will not suffice to offset project impacts.

Given that more than two years have passed since our last round of comments were shared with the project and that we have not received any updates, including the updated version of the BMEP, we are unsure if the project has made progress towards alignment with IFC PS6 and improving the mitigation of its impacts on chimpanzees. In addition, following the demerger of Iluka Resources with SRL and the IFC's retreat from the project as a lender, we do not feel the project is currently aligning with IFC PS6 and we have lost our leverage to ensure our comments are being considered in earnest and implemented. We have therefore decided to officially disengage from this project.

Best regards,



Dr Genevieve Campbell, Lead of the ARRC Task Force