Bon Ami Bauxite Project Guinea, Supplementary ESIA Specialist Studies, July 2020

Comments from the ARRC task force panel, August 28th 2020

Background

The Bon Ami Bauxite Project, located in the Boké region, in the Republic of Guinea is being developed by Dynamic Mining. The project involves a bauxite mine and associated infrastructures, including a haul road to bring the ore from the mine to an export terminal near the Rio Nunez river. The project also consists of barging/transhipment operation to transport the bauxite down the Rio Nunez river to load onto ocean vessels.

Initially, the project will export six million tons of bauxite per year. This will increase to ten million tons of bauxite per year after three years. The operational phase of the project will last for 13 years. The project aims to start the construction towards the end of 2020 or in 2021 after financial close.

The project overlaps with the range of the Critically Endangered Western Chimpanzee (*Pan troglodytes verus*) and as such, the project has conducted several chimpanzee surveys over 39 days between 2018 and 2020 in the aim of better understanding their distribution and abundance in the project area:

1. In 2018, BEDD conducted a chimpanzee survey within the Project area over 19 days. The surveyors walked along transect routes recording chimpanzee's nests;
2. In 2019 SLR conducted an initial scoping survey over 9 days, from November 27th to December 5th. They used reconnaissance walks within pre-identified potential habitat of interest. They identified areas to be surveyed using (i) satellite imagery and (ii) interviews of villagers and hunters settled in the study area. The team walked in a predetermined direction taking the path of least resistance. Most of the transects were located along watercourses. In addition to the transects, 7 camera traps were placed starting in December 2019, with an additional 8 camera-traps from March 2020 onwards; and
3. In March 2020 further surveys were conducted by two teams from 8th March to 19th March, thus 11 days. They walked 25 line transects of 2 km each in length. The area covered included the mine area plus a 3 km buffer area and the remainder of the mine permit area up to the Taramansi River in the west.

The ARRC Task Force of the IUCN SSC Primate Specialist Group was asked to provide feedback on all chimpanzee-related aspects of the Supplementary ESIA Specialist Studies, including the: 1) Biodiversity Assessment, 2) Framework Biodiversity Management Plan, and 3) Biodiversity Offset Management Plan (BOMP). These documents were produced by SLR Consulting Limited for Dynamic Mining. We are presenting here a summary of comments provided by a panel of four chimpanzee experts with relevant experience in this region.

General comments

The document demonstrates a good understanding of chimpanzee behavioral ecology and challenges in determining exact population size of great apes. Although several rounds of field surveys were conducted between 2018 and 2020, gaps still remain regarding the number and size of chimpanzee communities that may be impacted by the project. Chimpanzees have complex socio-ecological systems and can possess large territory in this type of environment, which require a significant survey effort in order to understand their

distribution and abundance in relation with project infrastructures. Further surveys are recommended and more specific comments on the surveys completed to date are provided below.

The Project's Biodiversity Assessment acknowledges the breadth of habitat types that chimpanzees use and has identified some of the direct and indirect impacts the project can have on chimpanzees. It is encouraging to see that some of the mine and infrastructure layout has been moved to avoid chimpanzee habitats. However, some project's impacts have been downplayed or not identified (e.g. risk of disease transmission) this should be completed in order to ensure that relevant mitigation is in place to address all potential project's impacts.

Once further surveys will have been completed, it will be possible to plan for the Project's offset. It is not possible to propose a location for a chimpanzee set-aside at this stage with the data available, and this set-aside would only help to minimise impacts to chimpanzees but would not be considered a viable offset option. A biodiversity offset offsite will still be required by the Project to compensate its impacts to chimpanzees.

Specific comments

1- Chimpanzee field surveys

a) Survey area

The survey area has included a buffer around the mining operations and in some place has extended outside of the project's concession, however the haul road and the port terminal have not been included in most surveys. It would be important to present all information gathered during surveys in the Supplementary ESIA Specialist Studies document and to explain better why and how certain areas where excluded and ruled out as not having chimpanzee present. The area surveyed at the moment is not judged sufficient to include the extent of indirect impacts on chimpanzees, and to understand where the chimpanzee's territories are located in relation with project infrastructures.

Cumulative impacts were stated as out of scope for this report, but we would like to know how these will be addressed by the project.

b) Survey effort

As already mentioned in the report, further field surveys will be needed to complete baseline data. Furthermore, it would be better to present the survey effort as the total length of recces and transects conducted, how many teams and how many camera-trap days instead of a number of days. For example, it is written that 7 camera-traps were placed over 3 months, but does this translate into 630 camera trap days, or were some camera-traps not functioning the whole time? etc.

c) Survey methods

It is always preferable to use a combination of methods to gather as much information as possible as each method has its limitations. Not much information has been provided on the results of the camera trapping. Furthermore, each method needs to be applied rigorously to provide accurate data, for example the standing nest crop count (line transect survey) should be accompanied by an estimation of nest decay rate specific to the site and survey season, which was not conducted for this project.

2- ***Chimpanzee baseline data***

There are still gaps in our knowledge as to the distribution and abundance of chimpanzees using the concession, but also around other project infrastructures (e.g. haul road and port terminal).). To devise appropriate mitigation measures, it is important to understand the number of chimpanzee communities and the location of their territories in relation with the project infrastructures. Further camera trapping and identification of individuals could help with this aspect, or by conducting non-invasive genetic surveys.

It is mentioned that camera-traps were used, but there is no information included on results of this method. It would be interesting to know the party size recorded on camera-traps, if some individuals could be identified, and other demographic parameters that could be assessed with these data (proportion of dependant infants).

It is not known all habitat types used by chimpanzees as surveys focussed on gallery forests, and mainly on recording nesting location. Further surveys should aim to obtain a better picture of all habitat types used within a chimpanzee's territory, with identification of core areas. In addition, it would be good to have a list of all botanical species used by chimpanzees in this area, for feeding and nesting.

It seems like the not all existing threats to chimpanzees in this area were identified in the document. For example, do chimpanzees eat farmer's crops, or enter the oil palm and cashew plantations? Does this create conflict? As the project can exacerbate existing threats, it would be good to have a better understanding of the current situation to better mitigate a potential increase in these threats (e.g. due to habitat loss from the mine, chimpanzees may eat crops more frequently which could in turn increase human-chimpanzee conflicts). As well, it would be important to anticipate potential impacts caused by the mine and that have been recorded elsewhere, e.g. project-related in-migration leading to the immigration of people with different cultural background moving to the area and hunting chimpanzees.

3- Chimpanzee impact assessment

To better assess impacts to chimpanzees, it would be useful to have more information on the project, for example how many people will be hired during construction? Will they be hired from neighboring villages and where will they be housed? Has an in-migration study been conducted for the project?

It would be helpful to have a clear list of all existing threats to chimpanzees, and potential project impacts that have been identified.

The buffer used to determine the extent of impacts should be based on project data. For example, was a noise impact assessment conducted as part of the ESIA? This would provide some information as to how noise travels in this particular landscape and considering the background noise specific to this area. How far do people travel to collect firewood and to hunt? All this project-specific information would be useful to better assess potential project impacts to chimpanzees.

4- Chimpanzee mitigation (framework for BMP)

Some mitigation measures have been presented, and these will be elaborated in the BMP. We will be able to provide better feedback on the BMP once the complete draft will be available.

It is good to see some guidance already regarding Covid-19, but there should also be some general guidance on minimizing the risk of disease transmission even in the absence of Covid-19.

5- Framework for BOMP

It is not clear from the document if the project is aiming to achieve a Net Gain for chimpanzees or No Net Loss (on pages 8, 183 it is written 'preferably' a NG). International Best Practice advise to aim for a NG for species that trigger CH.

Currently, the information collected about chimpanzees is insufficient to plan for a set-aside. The set-aside proposed may indeed help to minimize threats to chimpanzees, but it would not be sufficient to attain a Net Gain for chimpanzees. This is because the proposed set-aside might not even harbour the complete territory of one chimpanzee community, and it is not connected to other chimpanzee communities within the larger landscape. It would therefore represent an isolated patch of forest/habitat.

A number of points also need clarification. For example, it is stated in the report that the offset plan would only be implemented if negative residual impact remains. However, according to IFC standards, offsets need to be implemented before the start of the impact/operation. This does not seem to be intended here. What is the duration of the offset? Could this also be clarified? Furthermore, there seems to be a misconception of the function of an offset. The proposed set-aside as one offset option is too small and isolated from other chimpanzee communities so it has no long-term viability (and may not even cover the entire territory of a community). We consider this mitigation rather than an "offset." The concept of Net Gain requires increasing another chimpanzee population elsewhere (or protecting chimpanzees currently under threat as an "averted loss") by more than the equivalent number of chimpanzees lost in the project area. Even with a hypothetical loss of only a few individuals in the project area, a much larger population and area would be needed to be protected elsewhere to achieve a Net Gain. The authors are advised to carefully consider the concepts of 'No Net Loss', 'Net Gain' to come up with a meaningful proposition about how to compensate for the negative residual impact that will occur in the project area. Although more data is needed to better quantify the project's residual impacts, it is already clear that an offsite offset will be required by the project.

Recommendations

Further baseline surveys need to be conducted by the project, which will then help to revise the mitigation strategy. Some of the survey gaps that still remain and need to be filled are:

- The location of chimpanzee's territories in relation with project's infrastructures;
- Identification of habitat used by chimpanzees other than for nesting;
- Identification of existing threats and their location;
- A list of all botanical species used by chimpanzees in this area to inform rehabilitation effort.

As chimpanzees show highly seasonal ranging behavior it is essential that multiple surveys be conducted to account for temporal variation in habitat and locational preferences. It is recommended that the Project considers a combination of at least two of the currently existing chimpanzee survey methods (among these: nest count transect distance sampling with the estimation of site-specific decay times, camera trap distance sampling and genetic capture-recapture methodology). A combination of methods will provide more clarity about the status of chimpanzees in the area than any single approach alone. We would be happy to continue

to be informed of the development of this project, and once further surveys will be planned, we can review and input into the survey plans (or terms of reference) before the fieldwork is undertaken to ensure that the best methodologies are being used within an appropriate survey area.

Where possible, we would advise collaboration with neighboring bauxite mining companies to align survey methods and share information to increase understanding of chimpanzee movement in relation with the different concession/mining permits. Chimpanzees have large territories and thus it is likely that some of the chimpanzee communities' territories overlap several projects.

We would like to have the opportunity to comment on a draft BMEP, as well as on the draft BMP and BOMP.

Other

- Table 3-1 species potentially present: the King Colobus *Colobus polykomos* EN should be added to the table
- Some of the status of primate species have changed, please change accordingly:
    - Sooty Mangabey VU
    - *Cercopithecus petaurista* NT
    - *Cercopithecus campbelli* NT
    - *Erythrocebus patas* NT
- There are a few spelling areas that need to be addressed, e.g. Kukl H., on page 19, and sooty angabey throughout the document.
- Pg. 4. Perhaps add reference to the wording specific to Great Apes in the Guidance Note to PS6 in the definition of Critical Habitat here? This is mentioned later in the documents, but it might still be good to include earlier on in the document.
- Capitalize ''Critically Endangered'' and ''Red List''
- Add reference to Western Chimpanzee Action Plan now that it has been published as well as the Guinea Chimpanzee Action Plan
- Please make the following edit by adding "critical" habitats ranked as low, moderate and high value for chimpanzee:
    - high – critical habitat for chimpanzee;
    - moderate – CRITICAL habitat which may be used transiently, e.g. temporary foraging and movement;
    - low – habitat unlikely to be used by chimpanzees such as haul roads, villages, recently cleared land for cashew plantation and savanna habitats
- Page 58 replace the word "longevity" with "survival"?
- Please clarify in the text whether the following statement has been verified by field surveys or interviews with the local population, or is this just an assumption from the expert? "The mine and concession areas do have some potential barriers/boundaries that may act to reduce chimpanzee movement through the landscape, such as the Taramansi River, the Henan haul road, and large areas of recently cleared forest (for cashew plantations).''