



Comments of the ARRC Task Force on revised BAP, BMEP, BMP, Offset plans for the Bon Ami bauxite project of Dynamic Mining in Guinea

March 8th, 2024

The ARRC Task force received from SRL Consulting Limited six documents on February 5th, 2024, related to the Bon Ami bauxite mining project in Guinea:

- Feedback on your last response (*ARRC comments BAP_Jan2024_SLRresponse_Feb2024*)
- Updated Biodiversity Action Plan based on latest comments (*Bon Ami_Biodiversity Action Plan_Rev03*)
- Biodiversity Monitoring and Evaluation Plan (*Biodiversity Monitoring and Evaluation Plan_Rev00*)
- Biodiversity Management Plan (*Bon Ami_Biodiversity Management Plan_Rev00*)
- Chimpanzee Offset Management Plan (*Chimpanzee Biodiversity Offset Management Plan_Final02*)
- Set aside Enhancement Plan (*Setaside Habitat Enhancement Plan Rev00*)

We are grateful for your response to our previous comments. However, please kindly find below further comments and recommendations of the ARRC panel for this project.

General Comments

- As previously mentioned, we do not think that your assessment of the project's residual impacts on chimpanzees is appropriate. It is difficult to estimate residual impacts on chimpanzees the way you propose based on subjective buffers on an approximate chimpanzee density. We reiterate that even impacts on a few individuals can entail repercussions on the whole community. In addition, impacts on a single community also has impacts on the wider population as this can severely reduce its genetic viability. We would recommend instead employing a scenario-based approach, with 1) a worse-case scenario which assumes that mitigation measures are ineffective and impacts on chimpanzees will be significant, i.e. use upper limit of 44 individuals, 2) a medium-case scenario in which some of the mitigation measures are effective, i.e. 19 individuals and 3) a best-case scenario whereby mitigation measures are effective and impacts on chimpanzees are limited, using the extent of direct impacts and the lower estimate of abundance of 8.
- We recommend that as the project acquires more robust information on chimpanzees in the area of influence of the project, i.e., more understanding of the number of communities,

their range, their number and sex ratio, and along with the monitoring of chimpanzees, then a more precise assessment of residual impacts is performed.

- To ensure proper implementation of the BMEP by the project team; we would recommend that a French version be produced, and appropriate training given to the team on the ground.
- The proposed offset Option 1 with the COHAB project will not suffice to attain a Net Gain (NG) of 21-59 as proposed here; offset actions and investment would need to occur in a wider landscape than the current remit of the COHAB to achieve such a NG. As chimpanzees reproduce slowly, the protection and reduction of threats to a population of c.500 individuals would probably be needed to attain such a gain. Therefore, the budget for the offset needs to be significantly higher to reach a NG of 21-59 chimpanzees over the course of 13 years.
- Finally, any community-level initiatives need to take care to avoid exacerbating negative interactions between people and chimpanzees and potentially enhancing any influx of people into these communities.

Specific Comments

Updated Biodiversity Action Plan:

1. In your response, you mention that '*Changes made throughout to reflect range of potential impacts from 8 to 44 (not 50 as this was a mistake in the second round of modelling – numbers to be updated based on ongoing monitoring)*'. However, for example on Page 29 of the BAP, there is still mention that potential residual impact for chimpanzees will be 8 individuals. It does not seem that you have therefore edited this consistently.
2. The proposed mitigation measures are appropriate, and the plan is sufficiently improved and more concrete than before. However, in terms of impacts, we highly recommend that the risk of enhanced negative interactions between people and chimpanzees (human-chimpanzee 'conflict') also be added (Table 12), mitigated and monitored (Table 13).
3. Section 3.8.2 mentions that local communities have observed groups of 30-40 chimpanzees: to what extent has this been corroborated at the community level by different observers, ensuring that they indeed clearly understand what chimpanzees look like versus maybe baboons for example, and that they report numbers accurately.

Biodiversity Monitoring and Evaluation Plan

1. The proposed monitoring and evaluation plan for chimpanzees is adequate, the selected survey methodologies with camera trapping running continuously and transect surveys performed annually, as well as genetic sampling, are complementary and follow best practices when it comes to surveying and monitoring great apes.
2. Concerning, camera trapping, there is mention that the Project will put in place a '*stratified camera trap monitoring system*'; however, it would be useful to mention the basis for the stratification, (e.g., habitat or else?); how many camera traps are proposed to be used? It would be good to be more precise in the document to ensure effective implementation. In addition, it is noted that '*Transect locations will be chosen each year based on results of previous surveys*'; however, we would recommend that Transect

Lines (TLs) be layout in a systematic fashion and their locations not modified annually to best compare between years to assess trends and monitor impact. This will in turn inform adaptive management, when necessary, e.g., if chimpanzees are no longer present or nest in an area which was used previously.

3. This plan proposes to involve local communities in the placement and the maintenance of camera traps (CT) and download of CT data. We would recommend that this process also involves agents for the conservation of nature (agents de conservation de la nature) to enhance the capacity of government agents. The training of local people in the use of camera traps must be linked to a conservation activity of the project in collaboration with the local population. Otherwise, this approach aimed at involving members of local communities may not be very effective and beneficial.
4. Genetic analysis based on non-invasive collection of fecal samples: this approach should help contribute to a better understanding of population structure (number of chimpanzee communities in the area), dynamics and distribution and generate a better estimate for population abundance.
5. The state indicators for chimpanzees are good; however, we would suggest adding the fact that CT, LT and genetic data can also be used to monitor changes in chimpanzee habitat use and distribution, while genetic data can assist with monitoring demographic structure, especially abundance and sex-ratio.
6. It would be easier to review pressure indicators relevant for chimpanzees if they were presented as in Table 1. A summary table would also be beneficial for the team that will need to implement the document, as otherwise they are likely not going to use this document.
7. Pre-construction surveys should extend to at least 200m around panels.
8. Table 3: Summary of chimpanzee surveys: In the table, the distance in km is given for all survey periods except for 2018 where only the number of nests is provided. If possible, the distance surveyed should be added for consistency.
9. Page 22 in Section 5.1.3.2. mentions chimpanzee numbers; the baseline number used here is 19 chimpanzees (previous page states estimate at 19 with Confidence Interval ranging between 8-44 individuals), but we would recommend not using this number alone without the CI. When it comes to a baseline for chimpanzees, we highly encourage the project to use the most parsimonious estimate of 44 individuals for consistency and a 'worst case' scenario for residual impacts and estimating the offset requirements. Concerning critical thresholds, we would encourage using percentage decline based on a refined baseline number of chimpanzees; until then, we insist that the number of 44 should be used.
10. There is no mention of the training of the team to ensure proper understanding and implementation of the BMEP. **We would like to remain informed on the progress of monitoring and evaluation activities taking place, with a review of the annual results and how adaptive management has taken place.**

Biodiversity Management Plan

1. It is stated that *'This BMP covers the period from 6 months prior to construction until mine rehabilitation is complete. It specifically excludes mine closure. Biodiversity-specific actions related to mine closure will be prescribed through consultation with an ecological expert in the mine Rehabilitation and Closure Plan directly. This BMP will then be updated to include any additional longer-term management actions, monitoring, or*

Key Performance Indicators (KPIs), with respect to action outcomes and potentially the triggers for implementation of further remedial measures.’ The project needs to ensure that its BMP is revised and updated regularly. **We also would like to review any additional longer-term management actions, monitoring, or KPIs, with respect to ‘action outcomes and potentially the triggers for implementation of further remedial measures’.**

2. Table on Page 8 notes that *‘The population is estimated to be 19.’* We would recommend updating this number and using the upper limit, i.e., 44 individuals.
3. Page 27 mentions *‘The two panels by the haul road will be mined independently in year 13. As there will be progressive habitat restoration within the main site there will be areas of reinstated habitat and newly created habitat in the set aside area for chimpanzees to use whilst the final two panels are operational.’* This assumes that the chimpanzee community which ranges in and around these two panels is also the same as the one which frequents the set aside or other restored areas; if this is not the case, then ‘reinstated habitat’ will not serve to minimize impact on chimpanzees of the exploitation of these two northern panels. Should the chimpanzees frequenting the set-aside and those using the area in and around the two northern panels not be from the same community, there is a significant risk of inter-community aggression which could lead to individual mortality.
4. Awareness and training of staff whether in BMP or BAP, need to specifically also mention best practices and behavioral conduct among staff especially when it comes to minimizing the risks of disease transmission to chimpanzees, including reporting system for encountering wildlife carcasses, especially that of chimpanzees (please check Infographics available on <https://www.arrctaskforce.org/informationaldocs>).

Chimpanzee Offset Management Plan (COMP)

1. This is a Chimpanzee Offset Feasibility Study not a Management Plan
2. Chimpanzees are resilient, but impacts may also take time to be noticeable in their population given their slow reproductive rate.
3. The residual impact assessment underestimate impacts and does not consider several of the impacts, such as chimpanzee-human negative interaction, in-migration, etc.
4. Chimpanzees possess quite complex socio-dynamic, and thus impacts are on whole communities, not individuals. Impacts on communities can also have a snowball effect on the wider population across the entire landscape, as opportunity for migration of individuals may be significantly reduced, reducing its longer-term genetic viability.
5. We would suggest moving forward with the first option (COHAB), but across a wider landscape if you want to achieve a NG of 21-59 individuals. The Moyen Bafing NP is already the offset of two mining companies and there is no space at the moment to add other mining companies’ contribution to this offset.
6. Section 5.2.2 states that *‘Guinea has one of the smallest protected area networks in West Africa with just 2.9% of the total land coverage (Brugiere and Kormos 2008).’* This is outdated as this fails to include the Moyen Bafing NP. Figure 5-1 is therefore not up-to-date; please gather appropriate up-to-date resources.
7. Funding mechanism: A sinking fund may not ensure achievement of NG; NG is unlikely to be achievable within the lifespan of the mine (13 years); therefore a

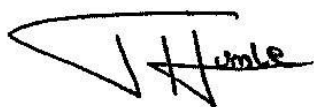
Conservation Trust Fund with an endowment system in partnership with other private sector projects could be a better avenue to ensure long term sustainability of offset actions and NG (The following report (<https://www.rrctaskforce.org/internalreports-statements>) precisely raises this issue). The option for 'a new partner (such as a mining company) taking ownership of the programme' (Page 24) would not be a suitable option either, unless injected funds, actions etc. are sufficient to achieve NG for the project before 'take over'.

Set-aside Enhancement Plan

1. We wish to reiterate that contrary to what is stated in the COMP, i.e. '*The Set-aside Habitat Enhancement Plan (SLR 2023) describes the actions that will be taken within the mine permit area to achieve NNL of natural habitat and NG in gallery forest and to compensate for impacts on chimpanzees.*' that the set-aside enhancement plan is unlikely to contribute to achieve NG for chimpanzees considering project impacts, especially exploitation of the two northern panels in YR13. Please kindly do make sure that this assumption has been removed from all the documents.

Thank you for considering our recommendations and comments. We also confirm that we would welcome the suggestion for a discussion concerning the alternative livelihood activities and conservation agreement program with SRL and Biotope to better understand the proposed approach and planned actions. Please do also kindly keep us posted on the status of the agreement on the shared use of the Dapilon Line Mining Road. We also would welcome reviewing the mine closure plan when ready.

Kind regards,



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On behalf of the panel for this Project