

Comments of the ARRC Task Force on chimpanzee surveys and the BAP prepared for the Bon Ami bauxite project of Dynamic Mining in Guinea

October 23rd, 2023

The ARRC Task force received from SRL Consulting Limited two documents on September 18th 2023 related to the Bon Ami bauxite mining project in Guinea:

1. Report_CHIMPS_Bon_ami_Jul2023, synthesis of chimpanzee distribution and abundance
2. Biodiversity Action Plan_DRAFT_rev02, the project's Biodiversity Action Plan

Please kindly find below the comments and recommendations of the ARRC panel for this project.

1) [Synthesis of chimpanzee distribution and abundance](#)

- The modelling analysis performed herein is rigorous and well done, based on the best available data, i.e., line transect data from 2021. However, we would like to note a couple of limitations associated with this analysis:
 - Distance sampling using line transects (standing crop nest count) tends to underestimate chimpanzee density compared with other methods (e.g. camera trap distance sampling) if not carefully implemented. The use of indirect signs like nests incorporate more variance into the calculations as you need to include a nest production rate and decay rates which are often not taken specifically at the site and during the actual period of the survey, as is the case in this study. We would therefore highly recommend a precautionary approach in such cases of uncertainty in great ape estimation and use of the upper limit of the abundance estimate, i.e., 50 individuals.
 - The modelling is of course based on a snapshot of data which is derived from where chimpanzee nests were found. The mapping of hotspots emanating from the analysis therefore reflects where chimpanzees are most likely to nest rather than areas that they are most likely to use during the day for foraging, travel, etc. This is particularly illustrated in the final map of this report, which highlights modelling results but also showcases records of actual chimpanzee observations and other signs; some of the white squares in between patches are actually certain to be used by chimpanzees, as they need to travel between patches. We would therefore recommend that the category 'likely absent' be dropped as many of the white squares on the grid are actually most likely also used by chimpanzees for travel, foraging etc. and this category is therefore not appropriate.
- We are pleased to hear that the project is continuing to roll out the use of camera traps and we should hope that this will serve to complement the data collected so far to provide a more complete picture of the chimpanzee habitat use and the number and size of communities using the area of influence. This then should be included in the long-term monitoring and evaluation program.

- It is good practice to justify and clearly define the project area of influence; we recommend this to be added to the text of this report and/or BAP.
- Figures 4 and 5a, b (there are two Figures numbered 5) and other maps within this document would benefit from clearer indication of all mining infrastructures, proposed or existing Henan haul road, the mining permit boundaries, and the project area of influence.

2) The Project's Biodiversity Action Plan

- The document refers to surveys of crop foraging and villager's attitudes and behavior towards chimpanzees that are contained within Appendix A which summarises notes from community meetings; this appendix is missing from the current draft; can you kindly please send us this appendix.
- **Chimpanzee surveys:**
 - We would like to reiterate that all habitats used by chimpanzees are critical habitat, which include natural habitat and modified habitats. Impacts to these habitats need to be compensated for chimpanzees.
 - There are inconsistencies between the two documents, e.g., number of nests recorded during latest round of line transects, 114 or 116?
 - Table 3 would benefit from additional columns citing methods used and sampling effort, e.g., number and total length of line transects.
 - Page 20, section 3.1.8: as facial recognition software is not yet reliable for chimpanzees, we would recommend developing a protocol for identification of individuals from camera traps in the BMEP. We would also recommend that appropriate training be provided and a database is set up to organise the data efficiently.
 - Section 4.2 related to training: the training mentioned stops at entering data, but what about analysis and interpretation which are crucial if the data are to be used for adaptive management and for monitoring purposes?
- **Project impacts on chimpanzees and mitigation measures:**
 - In section 2.2.4 on monitoring only monitoring of restoration efforts are discussed.
 - The report does list potential project impacts on chimpanzees and some mitigation actions are being proposed, such as not permitting any work between 8pm-6am; restricting road width to 10m and putting in place zero tolerance for staff in collecting fauna and flora and checking vehicles going in and out of the mining site, but we would recommend the insertion of a table listing each identified impact and the associated action(s) to be implemented to mitigate each one of these or alternatively modify Table 14 accordingly. This would help us see if impacts and mitigation measures are missing. For example, in-migration is not highlighted as an impact to chimpanzees, but some mitigation measures are presented. Then the potential for disease transmission by workers is not included and no mitigation measures are proposed (e.g., vaccination of staff, latrines for workers).

- We feel that the current BAP is somewhat incomplete when it comes to detailing mitigation measures to be implemented; several actions remain implicit and are to be described in future documents, such as the '*rehabilitation and closure plan*' or '*Influx Management Plan / Inward Migration Management Plan*'. We would therefore recommend that the BAP refers more explicitly to some of the measures or actions planned to be incorporated in these documents as these relate to specific mitigation measures addressing impact on chimpanzees and their sustainability beyond the project's life cycle. These aspects could be added to the Table recommended above.
- Concerning noise disturbance, what does 'adapting to sensitive receptors' mean exactly? How will noise disturbance in effect be mitigated? Table 14 mentions: 'Implement noise measures to limit noise emissions as per F-EMP9' but that is not an action, what actions will in practice be implemented?
- 3.1.6.3: how will 'particulate matter' in watercourses be mitigated?
- Several mitigation measures mentioned in the BAP focus around site workers, but no actions are aimed at addressing threats to chimpanzees related to in-migration; for example, will there be an awareness-raising programme concerning the risks of disease transmission aimed at surrounding villages etc.?
- Haul Road: either proposed 13 km OR share existing Henan haul road BUT where is this existing Henan haul road exactly (would be nice to see on maps)? To minimise impacts, it would make sense to share the existing haul road; should this be possible, we expect that there will still be some road construction for access, where will that be located precisely? And how will the mitigation hierarchy be applied to any new linear infrastructure?
- Page 18: we recommend the speed limit to be set at 30 kph rather than 40 kph; this is equivalent to what is recommended in urban areas with people and is typically best practice. For speed control, could vehicles be set up with an in-vehicle monitoring system because signage and speed bumps are not always effective? In addition, how do you plan to decide where to locate speed bumps? This should be detailed in the BAP.
- **Proposed set-aside:**
 - The rationale for the selection of the proposed set-aside (<10 km²) is unclear. We recognise that in the case of this project, you aim to rehabilitate some of the natural habitats within this set-aside, but as pointed out in the document, there are many uncertainties associated with the success of this plan, in addition to the future status and sustainability of proposed actions beyond the project's life cycle. The presence of two villages and cashew plantation activity in this set-aside present many challenges. For chimpanzees, we consider this as one of the avoidance measures taken by the project, but noticed it is not an area that seems to be heavily used by chimpanzees and will not reduce the impacts of the projects significantly. Better areas could have been considered for chimpanzees.
 - In addition, what will be the status of this set-aside after closure of the project? What will happen when all locally employed people lose their jobs when the project closes? There is no long-term guarantee that this set-aside, and the

actions and commitments therein will be sustained. An adjustment at a later date if unsuccessful is not really realistic both in financial terms and from a point of view of a suitable alternative site within the mining area. What guarantee would there be that the company will in practice be able to adapt and consider additional actions for another set-aside within the mining permit or change its offset requirements?

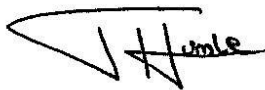
- Finally, it is impossible that the set-aside will yield NNL in habitat used by chimpanzees, especially considering the uncertainties and time lags; a 12-year period will be the strict minimum required for fallow areas to regenerate into a very young secondary forest; it is therefore unlikely that regeneration will be sufficient within this time lag or even be observed at a level suitable for chimpanzees even if proposed habitat enhancement is to start prior to mining exploitation as proposed in the BAP (what guarantees are there that this will indeed take place?).
- When it comes to the sustainable livelihood programme proposed, there are several issues with the activities that are being proposed. Apiculture and planting fruit trees for people and chimpanzees risk eliciting or even exacerbating negative interactions between villagers and chimpanzees; should people have the expectation that fruit trees will provide income, this may reduce their tolerance of sharing fruit with chimpanzees. Chimpanzees in many regions consume honey and there is a risk that chimpanzees damage bee hives, hence further aggravating people-chimpanzee relations. Promotion of masonry and carpentry is a nice idea, but then these crafts require raw materials which will be sourced locally probably from nearby forests, a consideration to take into account. How will payments for conservation agreements be made sustainable?
- **Restoration:**
 - Section 2.2.3 Restoration should not only focus on mining panels, but also on all associated infrastructures whether temporary or permanent during the project's life cycle. We would also recommend consulting a restoration expert with experience with mining rather than a biodiversity expert, unless they have good expertise with restoration efforts of mining sites in West Africa.
- **Estimation of Residual Impacts:**
 - The chimpanzee population present in the mining permit is estimated at about 50 individuals (as per upper limit from modelling report). It is evident that both direct and indirect impacts of the project will impact many more chimpanzees than has been estimated herein as the loss of a few individuals can compromise the survival and/or reproductive output of an entire chimpanzee community. Habitat loss has been the main impact considered here, but constraints on movement, dispersal (migration of individuals between communities), access to resources (food, water and nesting tree species), as well as the risk associated potentially with enhanced negative interactions with people (more encounters between people and chimpanzees and heightened crop consumption as result of loss of natural foods) and increased anthropogenic activities associated with in-migration can significantly further exacerbate the loss of chimpanzees. Any

habitat loss, especially natural habitat, will impose nutritional constraints which can have important negative consequences on chimpanzee health and reproduction and affect their movement and dispersal habits. A precautionary approach/principle estimate of residual impact would therefore be to consider the upper estimate of chimpanzees within the project area of influence, i.e., 50 individuals. Once the project can demonstrate the effectiveness of its mitigation measures, the offset requirement can be re-estimated.

- Given that there is so much uncertainty with the number of chimpanzees likely present and impacted, it would be better to use a range, or less precise indicator like <10 individuals instead of 8 individuals when reporting values.
- **Offset pre-feasibility for chimpanzees and next steps**
 - Page 55: Section 5.4.2 Regional Strategy for Boke Region. This process should also involve the Ministry of the Environment and Sustainable Development (MEDD).
- **Additional comments:**
 - In light of our previous recommendation to remove the category 'likely absent', many of the tables within the BAP will require updating.

Thank you for considering our recommendations and comments. We look forward to seeing a revised version of the project's Biodiversity Action Plan.

Kind regards,

A handwritten signature in black ink, appearing to read 'Humle', with a stylized flourish above it.

Tatyana Humle

Coordinator, IUCN SSC PSG SGA ARRC Task Force