



Status of Engagement with Bon Ami Bauxite Project in Guinea

July 3, 2024

The Bon Ami Bauxite Project (hereafter referred to as 'project'), located in the Boké region of 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/transshipment operations to transport the bauxite down the Rio Nunez river to load onto ocean vessels. The presence of the Critically Endangered Western Chimpanzee (*Pan troglodytes verus*) has been confirmed within the project's area of influence, and the project first contacted the IUCN SSC PSG SGA/SSA ARRC Task Force¹ in 2020 to align with the International Finance Corporation Performance Standard 6, GN73.

This letter acknowledges that the ARRC Task Force has pursued its engagement with the project since 2020, with a slowdown in the project's activities during the COVID period until May 2023 when the project recontacted the ARRC Task Force.

In 2020, the ARRC Task Force was asked to provide feedback on the chimpanzee-related aspects of the: 1) Biodiversity Assessment, 2) Framework Biodiversity Management Plan, and 3) Biodiversity Offset Management Plan (BOMP). The ARRC panel for this project reviewed these documents and provided feedback. In our initial statement, we recommended that the project:

- **Consolidate and present all data collected on chimpanzees:** Chimpanzee survey data have been collected between 2018 and 2020, but not all this information has been captured in the documents presented.

Project progress:

- *Chimpanzee data were consolidated with further surveys conducted as proposed below. However, data on existing threats to chimpanzees within the area of influence of the project is still lacking.*

- **Conduct additional chimpanzee baseline surveys:** We recommended collecting more information on other primate species of conservation concern present in the area (i.e. EN *Ptilocolobus badius temminckii* and EN *Colobus polykomos*).

Project progress:

- *Further chimpanzee surveys have been conducted and a modeling analysis was undertaken. Nevertheless, the project is still lacking the levels of detail necessary*

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).

to grasp the full impact of the project on chimpanzees as the analysis was very much focused on the impacts associated with habitat loss and failed to account appropriately for other impacts such as the risk of hunting or capture of chimpanzees, risks of disease transmission and all pressures associated with increased anthropogenic activities linked to human in-migration and other indirect impacts.

- **Revise the mitigation strategy:** Once further complementary baseline data have been collected, the mitigation strategy should be revised to make certain that all potential impacts have been identified and to ensure that the avoidance and minimization measures will reduce these impacts to a minimum. The proposed set-aside can be part of the mitigation strategy but is currently not helpful for chimpanzees and will not contribute to either “No Net Loss” or “Net Gain” for this species. From the information presented to us, it is clear that not all impacts can be avoided and minimized, and thus an off-site offset will be required. The offset requirement will need to be reassessed once better information on chimpanzees has been collected.

Project progress:

- *We still have not received and reviewed a final BOMP for the project, although we had the opportunity to review a document entitled COMP which is more a chimpanzee offset feasibility study rather than an offset management plan.*

Since the resumption of engagement with the project in May 2023, the ARRC Task Force provided feedback on their chimpanzee survey scope for further surveys, the Biodiversity Management Plan (BMP), and the Biodiversity Action Plan (BAP). **We are waiting to review the Biodiversity Offset Management Plan (BOMP) which is planned to be sent to us in August 2024.**

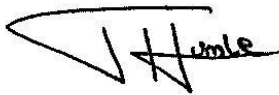
Despite the progress that has been made to generate more comprehensive baseline survey data on chimpanzees and produce improved action and management plans, the project is still lacking:

- A robust baseline of the threats to chimpanzees in the area of influence of the project.
- A good rationale for the proposed set aside for chimpanzees which currently is not an area recognized for its significant presence and utilization by chimpanzees; we recommended to explore an alternative set aside(s) that would be more suitable for chimpanzees within the area of influence of the project that would act as more effective avoidance measure, also accounting for connectivity potential within the landscape.
- Detailed understanding of the chimpanzee population structure, demography and home range which would help with a more rigorous impact assessment of the project's impacts on chimpanzees and improve the mitigation plan.
- Data on the two species of endangered Colobus monkeys, i.e. *Piliocolobus badius temminckii* and *Colobus polykomos*, in the project's area of influence.
- A practical BMP with a French version to facilitate effective implementation on the ground, as well as an updated BMEP with pressure-state-response indicators to monitor the effectiveness of mitigation measures and enable adaptive management.

- A Biodiversity Offset Management Plan (BOMP) with suitable offset site(s) to compensate for the project's residual impacts on chimpanzees.

We confirmed in March 2024 that we would welcome a discussion concerning the alternative livelihood activities and conservation agreement program with the consultants to better understand the proposed approach and planned actions; however, this has not yet taken place. We are also awaiting confirmation on the status of the agreement on the shared use of the Dapilon Line Mining Road which would help the project minimize its impacts on chimpanzees. Finally, as per our MoU with the project, we expect the project to submit its chimpanzee survey data to the [A.P.E.S. database](#).

Best regards,

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

Dr Tatyana Humle, Coordinator of the ARRC Task Force