

19 December 2023

Attention: Tatyana Humle
IUCN ARRC Task Force
thumle@rewild.org

SLR Project No.: 425.064690.00001

RE: SLR's Response to ARRC Comments Regarding the Bon Ami Project

Dear Tatyana,

Thank you for taking the time to review and provide feedback on the Biodiversity Action Plan for the Bon Ami bauxite mine in Guinea (operated by Dynamic Mining (DM)) on behalf of the ARRC Task Force. We also appreciate you attending a call with us.

In this document we have responded to your comments directly and made changes to our documentation where appropriate. Our responses are provided in Table 1. We have attached the relevant documents.

Summary of communications to date:

- In 2021, the ARRC Task Force provided feedback and recommendations on additional surveys for western chimpanzees to be undertaken by DM. After a pause in the project, the ARRC Task Force was recontacted in May 2023 to resume its engagement.
- May 22nd 2023: SLR provided ARRC with documents including the BMP.
- June 27th 2023: ARRC provided feedback on those documents.
- September 18th 2023: SLR provided ARRC with additional documents, including the BAP.
- October 23rd 2023: ARRC provided SLR with feedback on the BAP.
- October 31st 2023: Video call between SLR, ARRC, and DM to discuss the BAP.

Summary of documents provided in this response:

- Covering letter (this document)
- Biodiversity Action Plan, DRAFT, November 2023
- Appendix A: Notes from community meetings

The Draft Offset documents are currently with the client for review and comprise of:

- Set-aside Habitat Enhancement Plan
- Chimpanzee Offset Management Plan
- Mangrove Offset Management Plan

The first two documents will be sent to ARRC for review in due course.

Table 1: A summary of SLR's responses to each comment from ARRC

Summary of ARRC Comment	SLR Response
1) Synthesis of chimpanzee distribution and abundance	
Use upper abundance limit - 50 chimps	See footnote 4 in the BAP. We have acknowledged the higher estimate but clarified that the 2021 study was used for residual impact calculations because the data collected are more accurate. In addition, the 2021 study has a higher average density (the study area was smaller), which is used for the residual impact calculations. Therefore, the residual impact calculations are higher with the current figure than if 50 was used.
Remove category of "likely absent"	This has been completed for tables, figures, and calculations.
Include camera trapping in the long-term monitoring plan	This forms part of the BMEP. Some text added for clarity.
Add AoI justification text to BAP	Text added (section 3.1.1.1). The study area was developed over the ESIA process.
Make mining infrastructure clearer on figures	Figures amended.
2) The Project's Biodiversity Action Plan	
Send Appendix A - villager surveys - to ARRC	Appendix included in documents sent to ARRC.
Chimpanzee Surveys	
All habitat used by chimps is critical habitat	Text altered as appropriate.
Number of nests recorded is inconsistent	Text altered as appropriate.
Table 3 - more detail in additional column(s)	Text added - methodology column.
Page 20, section 3.1.8: concerns regarding facial recognition	This is addressed in the BMEP, which acknowledges facial recognition as possible but not a key part of monitoring. Training and data handling are also addressed.



Summary of ARRC Comment	SLR Response
Section 4.2 - training - ensure it covers data analysis and interpretation for adaptive management	This is developed further in the BMEP, and training is discussed. Some text added for clarity
Project impacts on chimpanzees and mitigation measures	
In section 2.2.4 on monitoring only monitoring of restoration efforts are discussed.	Text added for clarity. The BMEP includes monitoring for natural habitats and restored areas.
Include table to show each impact and its associated mitigation measure(s)	This has been included as appendix B and combines the BMP and BAP.
More detail required on plans not yet written, and suggestions / guidance can be included here	More detail and guidance have been written into the BAP.
More detail on noise disturbance	Detail pulled through from ESMMP.
3.1.6.3: how will 'particulate matter' in watercourses be mitigated?	Detail pulled through from ESMMP.
Show / develop measures relating to in-migration in surrounding villages	More detail and guidance have been written into the BAP.
Clarify plans around haul road	We have communicated further with the client and have details around the haul road. It will be shared but there will be some new road construction (3 km between mine and existing road, 10km at end to port). We have an updated figure with the road layout
Include in-vehicle monitoring system	Included in BAP and BMEP.
Detail speed bump location decision	More detail and guidance have been written into the BAP.
Change from 40 kph to 30 kph	Actioned.
Proposed set-aside	



Summary of ARRC Comment	SLR Response
Set aside area - clarify the reasoning and maybe consider other areas	Text has been added into the BAP to clarify the set-aside area decision making. See section 3.8: It was chosen initially as an avoidance measure because it was some of the most suitable habitat for chimpanzees within the concession area and was not of significant commercial interest. As the BAP developed it became clear it could also be used to provide compensation through habitat restoration.
Set-aside - how can you guarantee the long-term success of the area?	Section 3.8.5 added to cover this aspect. The Set-aside Habitat Enhancement Plan process aims to ensure the long-term success through the setting up of conservation agreements (CA) with communities. The BMEP acts as a failsafe through adaptive management.
Set-aside - what guarantees are there that habitat restoration will be successful and will achieve>NNL?	The idea of the CA is that the communities realise the benefits of the habitat restoration and gain benefits in other ways. If this approach fails then other areas of the mine permit area can be considered for additional work.
Questions regarding the conservation agreement. How can we be sure it will reduce and not exacerbate human-chimp conflict? How will payments for conservation agreements be made sustainable?	During the development of the CA an initial timeframe will be set for payments. The CA will be monitored annually to understand issues, conflicts and effects on chimpanzees. Adjustments will be made as necessary.
Other	
Restoration text needs to be expanded and include other areas, not just mine panels. Also, consider a specific restoration expert.	Restoration expert added to text. Restoration text clarified so it covers all areas. Additional detail on maintaining restoration efforts can be found in the BMEP.
Estimation of residual impacts to be re-considered	See footnote 4 in the BAP regarding the residual impact calculations. The process through the BMP, BAP, COMP, and BMEP aims to avoid and minimise impacts to chimpanzees as far as possible using the set aside for habitat enhancement; with a net gain achieved through the offset. Residual impact text has been amended to reflect uncertainties in the estimations and provide a range of numbers. Text has been strengthened where possible and mitigation measures are clarified in appendix B. The COMP reflects this uncertainty and is designed with flexibility.



Summary of ARRC Comment	SLR Response
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).	Text added to show working with MEDD.
In light of our previous recommendation to remove the category 'likely absent', many of the tables within the BAP will require updating.	Tables updated.



We hope you find our responses and amendments to your satisfaction. Should you have any further comments or questions, the please do not hesitate to contact us.

Regards,

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Attachments Appendix A: Notes from community meetings

