



IUCN SSC PSG SGA/SSA¹ ARRC Task Force

EAK Ebolowa-Kribi Road Upgrade Project: *ARRC Task Force comments on the Biodiversity Offset Management Plan (BOMP)*

May 9th 2025

The ARRC Task Force received on the 4th of April 2025 the following document:

- '20449507-EAK_Biodiversity Offset Management Plan-Strategy_2025_Rev0.0'

The ARRC Task Force panel for this project issued the following recommendations and comments:

General Comments & Recommendations

- The Biodiversity Offset Management Plan (BOMP) Strategy developed for the Kribi-Ebolowa road project reads more like a pre-feasibility offset study rather than an implementable offset management plan. The selection of the three core offset actions—Offset Action 1 (Land Use Planning), Offset Action 2 (Support to Campo Ma'an National Park), and Offset Action 3 (Habitat Enhancement and Land Restoration)—from an initial list of 16 offset options was justified based on prior consultations and alignment with key conservation targets. Each of these options touches on important dimensions of biodiversity offsetting: participatory land use planning and community involvement, reinforcement of protected area management, and restoration of degraded but ecologically valuable areas. It should be noted that several of the offset options presented are not offset per se but minimization or restoration measures that should be part of the project's mitigation plan already, such as the options 1, 11, 12 and 14.
- One area of concern regarding the retained options relates to *roles and responsibilities for implementation and monitoring*. The current strategy assigns oversight responsibility primarily to the Ministry of Public Works (MINTP), which, while logical as the project proponent, lacks the technical capacity and mandate for long-term biodiversity conservation. Ministries such as MINFOF (Forests and Wildlife) and MINEPDED (Environment) should play a more central and clearly defined role in the implementation and monitoring of biodiversity actions. In addition, the strategy envisions the involvement of NGOs and external biodiversity specialists, but their roles are not yet precisely defined or embedded in a governance structure. This could create confusion or inefficiencies once implementation begins. A stronger multi-stakeholder

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)

governance framework should be developed to clearly assign and coordinate responsibilities among government, NGOs, local communities, and international partners.

- The strategy's approach to stakeholder engagement is generally promising but should also include engagement with local councils and the Ministry of Economy, Planning and Regional Development and law enforcement agencies and the judiciary (to ensure prosecution and the full implementation of the rule of law, not simply confiscation of wildmeat for example).
- The selection of pilot communities for Offset Action 1 raises the potential risk of inequity and resentment among non-selected communities, especially when benefits such as alternative livelihoods and technical assistance are unequally distributed—see below for further specific recommendations on this issue.
- Beyond implementation and engagement, other potential issues that could compromise effective implementation and long-term monitoring include:
 - land tenure conflicts, overlapping land use claims, and potential conflicts with existing local development plans—see below for recommendations to minimise risks.
 - ensuring long-term capacity at the community level for ecological monitoring and enforcement in the absence of permanent external support. Are there no local NGOs, CSOs operating in this area already? For sustainability purposes, an activity could be to build the capacity of local CSOs/NGOs operating in the area in great ape conservation and monitoring.
- Among the initial 16 options considered in the document, there are some potentially essential measures that were not retained but should be reconsidered or at least integrated into the design of the selected three offset actions. Notably, Option 14, which involves long-term biodiversity monitoring, is fundamental for assessing the effectiveness of any conservation action and should not merely be referenced across plans—it should be budgeted and structured as a central element of the BOMP. Additionally, Option 15 which proposes to support existing biodiversity NGOs should play a critical supporting role in enhancing technical capacity, especially for species like great apes that are prone to injury or conflict with humans. Option 13, which proposes collaboration with private sector stakeholders operating in the area (agribusiness, mining, etc.), could significantly improve shared accountability and broaden financial support for conservation goals. While these options may be harder to measure in terms of habitat gains, they provide critical enabling conditions for achieving durable conservation outcomes for the three main options considered herein.
- A major gap in the current document is the absence of a financing mechanism. While the strategy acknowledges that financing will be necessary and that MINTP is willing to support implementation, no actual mechanism is proposed. This is a significant risk to the success of the offset strategy. It is recommended that the project proponents consider contributing an endowment to the Trust Fund funding Campo Ma'an, which could ensure stable and long-term financing. Contributions could also come from project tolls, environmental taxes, or partnerships with the private sector (especially agribusiness and mining operations within the region). The plan could also explore Payment for Ecosystem Services (PES) models or climate

finance (e.g., REDD+, biodiversity credits) where forest protection aligns with carbon sequestration goals. Crucially, the chosen financial model should include transparent governance, third-party oversight, and flexibility to support adaptive management.

- The road map section presented in the strategy outlines the general steps for advancing the BOMP but falls short of providing detailed operational guidance. While it rightly emphasizes further stakeholder engagement and the need to define financing sources, it lacks a clear timeline, specific milestones, cost estimates, and deliverables. There is no detailed work plan that links proposed actions to resource allocation, team responsibilities, or risk mitigation strategies. To enhance its utility, the roadmap should be expanded into a more structured implementation plan. This should include a monitoring and evaluation (M&E) framework, a communication plan for stakeholder engagement, and a contingency plan for implementation delays or funding gaps. Without these elements, the roadmap risks remaining aspirational rather than practical.
- Finally, we recommend clarification on the offset duration and finances. However, we will need first and foremost to agree on the project's residual impacts on great apes in terms of abundance (see previous comments) to effectively determine the net gain requirements which will also help guide offset options, as well as monitoring and evaluation measures.

Specific comments

- The proposed steps for implementing Offset Actions 1, 2, and 3, as outlined in Tables 2, 3, and 4 respectively, are generally appropriate. The emphasis on participatory planning, Reciprocal Environmental Agreements (REAs), alternative livelihoods, community-based forest management, and buffer zone creation (the latter will require clear awareness raising as to what activities are permitted and which are not) reflects a thoughtful and context-sensitive design. However, the steps remain somewhat broad and conceptual. For instance, it is not clear what technical standards will guide the habitat restoration activities or how the biodiversity monitoring systems will be built and maintained over time. Moreover, while economic activities such as livestock rearing or value chain development are mentioned, no market or feasibility assessments are currently embedded in the initial steps. Adding more operational detail, particularly on timelines, deliverables, and risk mitigation, would improve the implementation readiness of these tables.
- Concerning Land Use Planning (Option 1):
 - The Ministry of Economy, Planning and Regional Development is responsible for the Local Land Use Planning Process (PLADDT) for which a methodology has been developed by MINEPAT. The process requires funding which should be guaranteed by MINTP. The implementation of this should be by NGOs that have the experience from other parts of the country. Indeed, local NGOs and CSOs are better placed to implement alternative/sustainable income generating activities in communities than government entities. Tropical Forest and Rural Development has relevant experience in the landscape.
 - Note that the PLADDT is initiated by the local council(s) concerned and not by any ministry. The process is expensive, could cost as much as \$100K. An important land use option

should be community forest - exploring carbon credits instead of timber exploitation in such forest should be the target.

- It is necessary to engage all the communities at the same to avoid conflicts in the choice of land use options. All communities have to be on the same page and in agreement. LUP planning cannot be engaged only in some villages and not others in the wider landscape.
- If the LUP is implemented following the MINEPAT methodology through the local councils, the status of the various land use options generated will be binding and integrated in the national land use map. This will help address some of the limitations/issues raised in the document.
- Supporting Campo Ma'an National Park (Option 2): Supporting the existing PA areas, including forestry and wildlife law enforcement in the wider landscape would be highly beneficial-but how will this be effectively achieved? We assume details should be provided in the BOMP. We recommend that a focus is granted to capacity building or gaps that are needed to be filled to enhance protection and law enforcement efforts, e.g. if in effect parc staff require training in SMART for example to be effective in their roles; equipment will not fill this gap and promote effective management.
- Concerning Habitat enhancement and land restoration (Option 3):
 - We recommend that habitat enhancement and restoration focus on allowing degraded natural forests to mature on their own. If adequate monitoring and protection is implemented, then this would be faster and more efficient than replanting trees where they have been cleared, although we still highly recommend that wherever there are risks of erosion that active restoration takes place. The project needs to ensure that local communities are willing to restore the identified areas and that this will be done with native species and protected over the long-term for these actions to be sustainable.
 - Any restoration of areas degraded prior to the project will require measures and insurances that they will not be degraded again post restoration. We highly recommend clearly defining land use options in a local land use planning process (PLADDT); this will help mitigate land grabbing or degradation of target rehabilitated areas that could follow the completion of the road. This is critical especially vis a vis Table 1 No. 13 as one would not wish local people living along the road to all engage in rubber or oil palm plantations for example as these will simply exacerbate deforestation-such activities could be highly attractive to local villagers, especially if companies supply them with saplings and the road market access is improved as result of the project. Also, any livelihood activities program should absolutely require the participation of the local communities in shaping and guiding sustainable and environmentally friendly options.
- There is mention of 'Support to existing Biodiversity NGOs and programs', but it is unclear what their remit will be and how these will be selected (who, what for, for how long and how their efforts will be financed, verified and coordinated?). To ensure effective implementation, this needs to be decided and agreed upon early on. Tropical Forest and Rural Development is one such NGO that has good expertise and experience, and it is good that the project has already engaged with them in their stakeholder process.

If you have any questions, please do not hesitate to contact us.

Best regards,

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

Dr Tatyana Humle

On behalf of the panel for the ARRC Task Force for this project