

IUCN SSC PSG SGA SSA ARRC Task Force's comments on Kribi-Ebolowa Road Project in Cameroon

07-15-2022

Thank you for contacting the IUCN SSC PSG SGA SSA ARRC Task Force. A panel was formed to advise on this project and review the draft 'Environmental and Social Impact Assessment' dated March 2022, with specific focus on the ape surveys conducted to date and the mitigation proposed for these species.

The panel thanks the project for contacting the ARRC Task Force at an early stage, before construction begins, to advise on additional ape surveys that may be required to guide further mitigation. Although the project is to upgrade rather than build a new road, we felt that the impacts on apes were downplayed. The project will have impacts on both the Critically Endangered Western Lowland Gorilla (*Gorilla gorilla gorilla*) and the Endangered Central Chimpanzee (*Pan troglodytes troglodytes*). According to GN73, the presence of these species automatically triggers Critical Habitat (CH), so there is no need for further assessment as it was presented in the document, and the project needs to plan to obtain a Net Gain for these species if it wants to align with IFC PS6.

Upgrading this road entails direct impacts, but indirect impacts (e.g. increasing ape bushmeat trade) will be more significant and have not been properly addressed in the document shared with the panel. Further to creating significant indirect impacts, it will also facilitate further development of other industrial development projects (i.e. mining, agribusiness, hydropower) and has the potential to lead to significant cumulative impacts. This was not well assessed in the version of the ESIA we have reviewed. We provide below general comments on the project and then specific comments for further ape surveys that should be conducted before construction begins to better anticipate and mitigate impacts to these species.

General comments

The area defined as 'Aol', i.e. 250m on either side of the RoW, mainly encompass direct impacts but not indirect impacts. Indirect impacts could reach up to 10-15km away from the road if, for example there is an increase in bushmeat trade, or the sale of charcoal along the road is facilitated by increasing traffic and quicker traveling time to major cities. We felt indirect impacts had not been sufficiently assessed in the present document. This in turn influences the area needed to be covered for further surveys, which need to cover the extent of potential indirect impacts.

There are several protected areas close to the road which may see an increase in deforestation and/or hunting after the upgrading of the road. Particularly vulnerable is the Campo Ma'an National Park which already sustains a high hunting and human pressure in its northern part, the area closer to the road (WWF 2015 & 2021 survey reports). The upgrading of the road will inevitably increase this hunting pressure on Campo Ma'an NP and extend it towards its southern portion when areas further north will become more depleted of wildlife.

The panel is worried about cumulative impacts, and particularly facilitating the influx of people coming in this area looking for work with other projects, which will exacerbate pressure on the remaining forests and ape habitats. There are logging and agribusiness permits close to the road that have not yet been developed but could get developed quickly after the upgrading of the road. Other agribusiness

projects in the area have hired 20,000-30,000 people, which is not negligible. Further to this there are mining and hydropower projects, and the proposed Mbalam to Kribi railway may benefit from an improved road in the same area (for example to transport construction materials). We feel that a 'Strategic Environmental Assessment' should have been conducted for this region, but at least a better consideration of cumulative impacts should be undertaken by the project. A project induced in-migration study should also be conducted.

It is not known if apes still cross this road regularly, however it is probable at least some individuals may cross from time to time when emigrating from their natal groups. Upgrading the road may therefore increase fragmentation effect and eventually reduce gene flow in this landscape. It would be important to understand ape population connectivity in this area.

The project has only conducted preliminary ape surveys over the course of about two weeks in 2021, and ten days in 2022. These were part of more generalist surveys, so the specific ape survey effort and methods are unclear. Furthermore, these surveys seem not to have been conducted by ape experts so it is very likely that nests or other ape presence signs may have been missed, and in addition overall survey effort and coverage was too low to inform mitigation for apes. Advice for further ape surveys is provided in the next section below.

Mitigation

Further ape surveys will help to obtain better data to inform mitigation. For example, it is not known yet if and where apes cross the road. This information would be needed to better protect these areas, for example by including speed bumps and/or speed limits. A bushmeat study would also be needed to understand the current trade, where hunting pressure is higher along the road, which towns have bushmeat markets, and also to anticipate where hunting pressure could intensify, so the project can devise additional mitigation measures.

It was not clear in the document where the control checkpoints will be located, and if these are also to control the bushmeat trade and logging trucks for examples. A bushmeat study would help to understand where 'Eaux et Forêts' checkpoints are located presently, and where additional checkpoints should be located.

The panel thanks the project for moving the location of the quarry away from ape habitat. However, further surveys in the Aol of the quarry need to be conducted to assess if noise and other disturbances could impact apes in its vicinity. It is also not clear where excavated material will be deposited and whether this will be in ape habitat (page 13).

At the moment, not enough mitigation measures have been included specific to apes. For example, no measures were included to prevent the potential for disease transmission during construction. Awareness and sensitization campaigns will also need to be planned to prevent an uptake in ape bushmeat trade and a complete degradation of the remaining forested habitats.

The project will need to engage with managers of the Campo Ma'an National Park to ensure adequate mitigation is put in place to ensure no indirect impacts from the project in this area.

Compensation

An offset will be needed for the project to achieve a Net Gain for apes as it is impossible to mitigate all impacts on these species. Further ape surveys and assessment of indirect impacts will help to understand the potential scale of impacts and therefore the offset requirement for the project.

Campo Ma'an was elevated to a National Park as part of the compensation scheme from the Chad-Cameroon pipeline project. They also created a trust fund which could be used to fund further conservation activities within this landscape. A review of this offset would be useful to understand what may have worked and not worked when implementing their offset to improve offset planning and implementation for this project. Another project that could be used to compare offset options is from Mount Cameroon National Park where a conservation credit scheme has been implemented.

Advice for further ape surveys

Further surveys are needed to better understand the distribution and abundance of ape species in the AoI. The AoI needs to be refined to include the extent of indirect impacts, and to make meaningful sense in terms of ape biology and ecology. For example, chimpanzees have territory of c. 25 km² in forested environment, therefore surveying a narrow band along the road will likely miss large portions of their territory, and it would be difficult to understand their territory boundary in relation to the road with such a small area surveyed.

Further surveys will need to happen before construction begins. We propose to the project to conduct surveys in two phases: 1) Interviews with local communities and recces to better understand potential ape distribution, existing threats, potential ape-human conflicts, asking interviewees if apes cross the road, etc; 2) Further recces and camera-trapping in areas identified as having potentially higher ape density. Additional methods, such as using passive acoustic techniques might be useful to get more insights into the intensity and frequency of some of the threats, by documenting gunshots and chainsaw activities for example, which in turn can help to guide law enforcement activities.

The project will need to consider the following comments when planning surveys:

- Redefine the AoI (i.e. survey area). We propose for the first phase to consider an area of 15km on either side of the proposed road alignment;
- Plan surveys in the dry and rainy seasons;
- Hire trained primatologists to take part in these surveys;
- Ensure sufficient survey effort: for the first phase this means all representative villages are interviewed and sufficient recces are conducted in suitable habitats, either as highlighted during interviews or based on interpretation of satellite images. As an indication, we would expect to plan for c.20 villages to be interviewed and c. 100 km of recces to be conducted during this first phase.

Further studies are also needed to better understand the current bushmeat trade and potential project produced in-migration.

We can help review and provide input into your ape survey plan. Please let us know if you need any clarification or have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "G Campbell".

Dr Genevieve Campbell

On behalf of the IUCN SSC PSG SGA SSA ARRC Task Force's panel