



IUCN SSC PSG SGA/SSA¹ ARRC Task Force

Ebolowa-Kribi Road Project in Cameroon: ARRC Task Force's comments on draft Biodiversity Management Plan, Habitat Restoration and Biodiversity Long-term Monitoring Plan and Biodiversity Action Plan

April 9th, 2025

We received from the project on the 11th of February 2025 drafts of the following documents:

1. BMP: Biodiversity Management Plan – for construction ('20449507-EAK_Biodiversity Management Plan_Rev0_Construction_Draft_IUCN')
2. HRBLM: Habitat Restoration and Biodiversity Long term Monitoring- For construction and operation-This document includes the management plan for habitat restoration of all the temporary facilities and construction areas and the monitoring aspects for both, the revegetated areas and the biodiversity throughout the life of the project. The HRBLM is thought to act as the BMEP for the Project, also including the rehabilitation monitoring. ('20449507-EAK_Habitat Restoration and Biodiversity Long-term Monitoring plan_Rev 0 DraftIUCN')
3. BAP: The Biodiversity Action Plan ('20449507-EAK-Biodiversity Action Plan_Rev0_Draft_IUCN')

General comments

- The BMP includes a general mitigation framework which captures quite well some impacts on small and medium sized biodiversity, but it lacks practical details on ape-specific mitigation measures and on assessing their effectiveness. There are no clear protocols for implementing mitigation measures, such as setting up and managing wildlife crossings or rehabilitating disturbed areas. There is also limited information on coordination among national and local authorities, local communities and great ape experts or NGOs as relevant. Timelines and responsible parties for each action are not always clearly defined, and monitoring protocols for assessing the effectiveness of mitigation are insufficiently detailed to ensure effective implementation and evaluation.
- We suggest that the HRBLM and the BMP be as practical and implementable as possible with a final version made available in French.
- From a feasibility perspective, the HRBLM plan outlines some realistic and necessary restoration and monitoring measures but faces significant challenges. Long-term implementation depends on sustainable funding, technical expertise, and enforcement.

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)

Furthermore, issues such as land-use conflicts, poaching, and deforestation by local communities are insufficiently addressed.

- The project needs to involve independent technical experts alongside local communities to work with the Ministère des Travaux Publics du Cameroun (MINTP) to provide valuable great ape and other necessary technical expertise and help maintain objectivity in monitoring and evaluation of impacts and mitigation measures. We also suggest defining thresholds for corrective actions if impacts on apes exceed acceptable levels, e.g. should one ape roadkill be recorded, a dedicated team needs to check the area, verify whether mitigation measures are present in that area and, if not, ensure that adequate measures be put in place or reinforce existing ones (N.B. any changes in the BMP actions also need to be updated herein).
- The net gain requirements outlined in the BAP highlight that *'The ROW [20m on either side] of the road (N17 and additional road sections), permanent facilities and temporary facilities were considered in the quantification. Critical Habitats (CH) and Natural habitats (NH) were calculated separately since CH need to ensure a Net Gain, while for the Natural Habitats (NH) only a No Net Loss is required. In our case, since all habitat types use by apes are CH (including Modified Habitat), all these habitats require a NG. It is good that the project considered all NH and MH (secondary forest) as CH; however, all areas used by great apes should be considered CH including plantations where evidence was recorded and the area for this calculation should consider the entire area of influence, i.e. 7.5 km on either side when it comes to great apes. This is why for great apes it makes more sense to use the number of apes impacted, rather than the habitat types used.*
- Indeed, regarding the estimation of residual impacts on apes and associated offset requirement, the project proposes to use a habitat metric approach using a 1.5 multiplier (including for great apes), but such approach will effectively underestimate the project's indirect impact on these CH-triggering species. **The ARRC Task Force recommends using the 'number of great apes' as a metric to estimate the residual impacts on their population.** Considering that ape baseline surveys suggested a low ape density in the area, we appreciate that it can be challenging to obtain precise abundance estimate, and thus to estimate accurately the number of great apes impacted. However, we would suggest combining the habitat metric with an indicator of ape abundance (either density or encounter rate) to have a better sense of the significance of impacts on the ape population and their habitats. Given the uncertainties in the survey data, a range of values, e.g. using the lower and upper density estimates (0.022 and 0.139 individual/km²), can be used for this assessment. Using only a habitat metric significantly underestimate the scale of impacts on apes.
- The ARRC Task Force would welcome reviewing proposed survey approach during construction and validating ape expert to be hired (whether individual or NGO).
- We would recommend setting up an independent advisory panel with appropriate expertise that could review monitoring results and support the project in applying adaptive management and change/adapt some of its conservation actions if necessary.

Specific comments

BMP-construction

- Concerning the two tolls, counting and weighing stations, who will manage these and how will toll fees be used to contribute to supporting maintenance and monitoring/evaluation activities?
- 'Opening and operation of 31 temporary borrow pits along the road, close to the ROW'- the project needs to ensure that their location is not sensitive for great apes or near known or newly recorded ape road crossing sites.
- BIO-MM01e mentions that a primatologist be included in the ECow team, but we highly recommend ensuring that this primatologist has relevant great ape expertise.
- BIO-MM01f: would add other great ape signs aside from nests, as presence can be confirmed via presence of faeces, feeding remains, vocalisation or foot/handprints. This is a reason why great ape expertise in situ is essential to recognise such signs.
- BIO-MM11e: proposes setting up of culverts for small mammals, amphibians and reptiles; however, no measures are proposed for large mammals, including great apes, such as underpasses or overpass to minimise road kills for these species-although we appreciate that BIO-MM05 has been revised, there is a need to specify what measures will be put in place at each of the known ape crossing points (P.K. listed) and new uncovered ones based on new records of great ape nests or other great signs on either side of the road. No details are provided either concerning great apes in BIO-MM61.
- For arboreal bridges (these are unlikely to be used by apes but could be invaluable for other species such as arboreal primates), we would recommend you consult experts as just putting ropes is not the most efficient (the IUCN-PSG working group on primate interactions is currently working on IUCN Best Practices for canopy bridge projects).
- BIO-MM01f – when great ape nests are present – stopping work for a better assessment is OK, but there is no timeframe and proposed actions apart from contacting experts and authorities. If nests or other ape signs are found near the road, this would indicate that the group most likely ranges on both sides of the road. We highly recommend that these areas should be earmarked for mitigation, e.g. underpass, overpass, speed bumps/limits, billboards or else. Section 4: this section mentions the ICMC code of conduct (separate document) but it would be useful to briefly highlight its relevance to mitigating impacts on great apes and other key biodiversity as content is not available herein. This section also needs to incorporate more measures concerning the risk of disease transmission to great apes and monitoring of carcasses (see our infographics on the topic: <https://www.arrctaskforce.org/informationaldocs>)
- BIO-MM60c – there needs to be more rigour concerning staff health screening and regular checks. Staff with flu and other symptoms of illnesses great apes may be susceptible to should be quarantined. See link above to ARRC infographics on the topic.
- BIO-MM08a – in addition to checkpoint controls, there is need for awareness raising in local communities in the project area on poaching and the wildmeat trade, waste management, etc.

- BM-06 – there are no details on great ape surveys during the construction phase, with the responsibility on a biodiversity specialist rather than a primatologist (great ape specialist).
- BIO-MM47: when it comes to spraying the road, it would be good to mention source of water and ensure minimal impact on hydrological system which can potentially affect wildlife and people.
- Some measures could be added, for example, when it comes to ensuring that speed limits are adhered to, we would recommend that vehicles be equipped with speed monitors with sanctions to drivers who do not respect limits or have teams in situ at check points control speed with speedometers with sanctions for violations (the latter is also relevant to the operational phase-needs to be added to relevant plans to ensure implementation).

HRBLM

- Normally a BMEP is developed along a state-pressure-response framework. We found some of the KPIs/indicators and their measures quite vague, and there was no KPIs/Indicators on threats (e.g. monitoring bushmeat markets). Regarding Key Performance Indicators (KPIs), the plan includes general biodiversity monitoring metrics, but those specifically tailored to great apes are not well defined, e.g. based on survey results these could include habitat use and distribution (compared with previous survey data based on recces and camera trap data-this will require expert for analysis of the data), number of records of injuries or roadkill of great apes, number of infractions recorded at control posts involving live or dead great apes based on intensity of controls per traffic volume, deforestation in CH and other anthropogenic pressures such as hunting signs, compared to baseline. Such indicators can help evaluate effectiveness of measures in place and the regular review of measures with defined thresholds for adjustments to be made.
- Section 6.2 concerning training:
 - needs to include specific training on minimising the risk of disease transmission, does and don't when seeing a great ape and system for reporting of live individual encountered carcasses of great apes-see above link to infographics 'Great Ape Disease Risk Mitigation for Industrial Development Projects' (FR versions available online).
 - '*Precautions to prevent exposure to human-wildlife conflicts*': what kind of precautions will be preconised?
- We have been notified that BAP_13 (The wildlife crossing effectiveness with camera traps for 1 year post construction) has been removed; this is highly unfortunate as BIO-MM61 in the BMP-Construction is proposing to implement just this, so this would already be in place, unless this was supposed to be removed as well (if so, then some serious cross checking is needed to ensure that all actions listed are correct and consistent). It is indeed critical to monitor and evaluate mitigation measures and those facilitating crossing or reducing the risk of collision are primordial when it comes to such road projects. If this cannot be implemented, we highly recommend that a centralised system managed by MINTP or MINFOF (as most appropriate) be put in place and regularly

reviewed. This system should encourage reporting and recording of date and specific location of any collision (lethal or leading to injury) with apes and other critical wildlife species so that measures, such as speed bumps, signage, speed controls and/or speed control posts, be put in place if lacking in these areas or reinforced if obviously ineffective.

- We have also been made aware that BAP_15 (The habitat connectivity study specific for Great Apes) has been removed. There is still the possibility to ensure gene flow for apes on either side of the road while minimising road kills. Is there any scope for plans for large under/over-passes that could serve large mammals and great apes? Other measures to complement these are speed bumps, billboards, and other signs indicating great ape passage, as well as speed control posts near hotspot areas (posts should be located at least 200 m away from crossing points as human presence could impede ape and other wildlife from crossing). As mentioned earlier, we highly recommend that specific measures be assigned to the different known crossing points and new ones that were not recorded during previous ape surveys-see above.
- Roles and responsibilities are broadly assigned; we would recommend outlining a clear coordination mechanism among different government agencies involved, and potentially with third parties such as NGOs, researchers, and local communities (trained trackers who recognise great ape signs).
- While MINFOF has experience in biodiversity conservation, its current capacity may be insufficient to conduct rigorous great ape surveys without additional support. We would therefore suggest that the MINFOF biodiversity specialist holds an oversight role while the surveys on the ground and other relevant measures are implemented by a qualified NGO and/or researchers should MINFOF not have the required expertise in-house (this is also relevant to include in the BAP). The project needs to ensure that it has the necessary funding for such third-party hires that would ensure effective implementation, monitoring and evaluation.
- Section 7.2 Reporting for Auditing section fails to include how non-compliance will be redressed; this is also relevant to internal monitoring when non-compliance is noted.

BAP

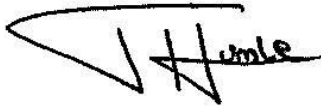
- 'BAP_09 (BM-06)'-states that 'Great Apes surveys will be undertaken using the most appropriate method agreed in consultation with the IUCN Great Apes Task Force.' without providing details despite our advice to date-**we would welcome more details here based on our previous recommendations and in the HRBLM, to ensure effective implementation.** It is good practice to intensify the monitoring during the construction phase, although the project should be aware that may not be possible to detect population changes during these short intervals, but it would help to detect drastic changes, as well as increase in threats.
- As proposed earlier, to enhance ape survey quality and strengthen proposed conservation efforts, we recommend a multi-stakeholder approach, bringing together experts from different sectors, e.g. qualified NGO and/or researchers into an independent advisory panel.

- The estimation of residual impacts on apes should combine a habitat metric and abundance index (see above). The use of habitat alone underestimates impacts on apes.
- Section 7.4 Biodiversity offsets options proposed (these are initial comments based on this document; we are to review shortly the BOMP that was submitted to us on April 4th, 2025):
 - Please note that long-term biodiversity monitoring should not be listed as an offset option as this is integral to the project's monitoring and evaluation requirements.
 - We recommend that habitat enhancement and restoration focus on allowing degraded natural forests to mature on its own. If adequate monitoring and protection is implemented, then this would be faster and more efficient than to 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.
 - Rather than creating new protected areas (PA) that may take time to establish, we would encourage creating community forests that are managed by local communities, and which could be eventually geared toward sustainable land use options including carbon and wildlife credit. This would be ideal, but this will require the support of qualified organisations to help put in place and manage.
 - 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 are provided in the BOMP)
 - We also encourage sustainable community outreach and awareness especially if accompanied by socio-economic benefits (improvements in local livelihoods), although these should in effect be associated with a reduction on pressures on CH and apes.
 - We also recommend clearly defining land use options in a local land use planning process (PLADDT); this will help mitigate land grabbing that could follow the completion of the road.
 - 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 verified and coordinated?).
 - We do not favour establishing a 'Wildlife recovery centre' as an offset option even if solicited by the government. The drivers of wildlife killing and capture are the key issues to be addressed first and foremost; a centre may help law enforcement agents to confiscate trafficked wildlife but it fails to address the root of the problem. Instead of creating a new wildlife recovery centre, we recommend working with and supporting existing centres in Cameroon such as Ape Action Africa, which would be more beneficial in the long term.

We look forward to receiving your response as to how you plan to address the above comments and feedback.

Should you have any queries, please do not hesitate to contact us.

Best regards,

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

Dr Tatyana Humle

On behalf of the ARRC Task Force panel for this project