**IUCN SSC PSG SGA/SSA[1] ARRC Task Force**

# ARRC Task Force's comments on the chimpanzee surveys for the Baomahun Gold Mine in Sierra Leone

October 29th, 2025

We received from the consultants for FG Gold Limited on the 26th of September 2025 and the 13th of October 2025 the following document, respectively:

- *ARRC Letter September 2025*: for information, as to what has been done to date and proposed outline of next steps
- *LKS Methodology DRAFT_04: Local Knowledge Survey:* new proposed methodology to secure information on chimpanzees across wider landscape within the area of influence of the mine project

The ARRC Task Force panel for this project has emitted the following recommendations and feedback on this report:

## General comments

- There has not been a clear articulation of the project's area of influence (AoI) which includes the extent of both the project's direct and indirect impacts, accounting for the mine itself and all associated infrastructures, including the access road and proposed tailings storage facilities. It is critical that the AoI be clearly defined and justified. Inappropriate definition of the AoI led to initial surveys being limited to the boundaries of the Kangari Hills' reserve while the critically endangered chimpanzee also ranges outside the borders of the reserve.
- The proposed additional interviews should also include villages to the north and close to the centre of the Kangari Hills, as these areas have confirmed presence of chimpanzees within the reserve boundaries and it is thus important to understand their presence, distribution, abundance and population structure (how many communities/groups and their respective size) outside the reserve boundaries, as well as inside. Groups are likely to be ranging in and outside the reserve and the project could effectively impact the entire chimpanzee population in this wider landscape.
- Indirect impacts of the project include the influx of people into the area seeking employment and/or business opportunities. Such in-migration is likely to exacerbate uptake of artisanal mining (ASM) activities within the Kangari Hills and in surrounding areas, an indirect impact of the project's presence in the locality. It is critical for the

[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)

project to secure a baseline for the number of people currently involved in ASM activities, their profile, i.e. whether they are resident or come from elsewhere.

- The project also needs baseline data on current threats to chimpanzees, including their interactions with local communities (e.g. crop foraging, quality of encounters, perceptions & behaviour of people towards chimpanzees when they see them and vice versa).
- The respective aims of the focus groups and the individual interviews need to be clarified and explicitly articulated. All social survey needs to be preceded with a clear statement concerning prior informed consent for participation and confirmation of anonymity following best practices.
- The panel also wish to inform the consultants that in alignment with IFC PS6, all chimpanzee habitat is to be considered critical habitat and that the 2022 critical habitat assessment mentioned in '*ARRC Letter September 2025*' is incorrect and requires revision after further surveys.
- Please note that the additional local knowledge surveys likely will require further detailed surveys of chimpanzees in the AoI of the project, i.e. localities outside the Kangari Hills' Reserve to ensure that more robust baseline is obtained for the purpose of the impact assessment, appropriate application of the mitigation hierarchy, i.e. avoidance, reduction, restoration and compensation, with an estimation of residual impacts on chimpanzees based on numbers rather than habitat metrics.
- Finally, the project also needs to carefully consider cumulative impacts within the landscape that are likely to further enhance threats and project impacts on chimpanzees.

## Specific comments

- The people running the social surveys should verify first and foremost whether FG participants and interviewees know what a chimpanzee is (avoiding confusion with baboons) and if they have seen them personally themselves. People should be asked open questions as to the physical characteristics (people should for example mention they do not have a tail without being prompted) and their behaviour, e.g. where they sleep, how they vocalise. This is important to establish prior to proceeding with further questions. The social team should also consequently be accompanied by a primate expert with good knowledge of the primates in the locality.
- The focus groups should provide a broader outlook on chimpanzee presence location (need precise location, such as cardinal directions or name of site, and distance from village) both current and historical, as well as seasonal patterns of occurrence in different localities, and general perceptions of threats to chimpanzees locally, typical encounter rates and habitats where chimpanzees have been observed or signs thereof such as nests. FG questions can also ask about whether people have ever seen a captive chimpanzee in the locality, where, and when and what happened to that chimpanzee and also whether anyone has ever come across a dead chimpanzee, where, when and what was the presumed cause of death. Consider strongly adding a question about whether chimpanzees cross any roads, if so ask about frequency, which season, how many individuals etc. Understanding if chimpanzees are crossing roads is important particularly given the company's road improvement and road creation plans and to formulate mitigation measures.

- The individual interviews should focus more on questions pertaining to interactions between people and chimpanzees in the village or neighbouring villages, as well as perceived threats to chimpanzees to triangulate information gathered during the FGs- one should never ask directly whether a person hunts or consumes chimpanzees or other primates; people are unlikely to respond truthfully, especially in an area that is Muslim dominated. Best ask whether they know whether chimpanzees have been killed or captured in locally and if they say yes, you may ask in which locality and why and when that was. One may also ask about how people generally respond when they see chimpanzees and how chimpanzees respond to seeing people. They can also provide insights into the crops that are potentially consumed by chimpanzees, where and when and roughly how often; whether it is their own or that of people they know.
- There should be clear criteria for partaking in the focus groups so that experienced and knowledgeable individuals partake, e.g. hunters, farmers who are relatively long-term residents to the area. Interviewees should also have lived a minimum of years in the locality; there is no point interviewing people who are recent residents.
- The photos used are not ideal and there are also some errors, e.g. the last photo of the sooty mangabey is actually that of a white-collared mangabey; there is also a misleading photo for the olive colobus. The panel therefore recommends careful review of the photos used and to only use a single photo or at most two -one of the face and the other of full body- alongside maybe an illustration from guide to West African primates. The set should also include one or two primate species that are not known to not occur in the area, as controls.
- It appears that the camera trapping to date has not yielded many images of chimpanzees; the deployment could therefore be adjusted to a design that aims to maximise the images of chimpanzees for the purpose of individual identification and a capture-recapture analysis. However, additional time would be required for such an analysis and reporting.
- Further field surveys will need to ensure at least one member of the survey team knows how to recognise chimpanzee nests in oil palm trees, as nests outside forests are likely to be found in oil palm trees.
- Although the map showing chimpanzee evidence is difficult to read, there does appear to be larger forest patches to the west and south of the mine site. This area should also be surveyed, regardless of feedback from community members on chimpanzee presence.

We look forward to receiving your response as to how you plan to address the above comments and feedback. We also look forward to seeing the revised interviews before they are being rolled out with a more complete map outlining the project's AoI and all the villages to be targeted.

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

Best regards,
The ARRC Task Force panel for this project