

IUCN SSC PSG ARRC Task Force's comments on Olam Project Gabon

06-05-2022

Thank you for providing an opportunity to the ARRC Task Force to comment on OPG's Biodiversity Action Plan (BAP) dated April 2022, and OPG's ape and elephant baseline monitoring protocol dated March 2022. Olam Project Gabon has already planted c.65,700 ha of oil palms across six concessions within ape's range. Unfortunately, no robust baseline ape survey data was collected prior to the establishment of the oil palm plantations. Further ape surveys are planned for 2022-2023 and are detailed in the monitoring protocol. We therefore provided comments to the best of our knowledge of the local context and using a precautionary approach. We provide first general comments on the project, and then more specific comments on the mitigation measures proposed, as well as the ape monitoring plan.

General comments

OPG has developed strong documents, included appropriate references, and sought input from relevant stakeholders. Engagement with local communities neighboring the concessions could have also helped to better understand threats and which mitigation measures could work in these areas. However, we feel that some of the threats to great apes have not been addressed adequately, and that the residual impact assessment was greatly underestimated. We provided more specific comments on these two points in the following section.

There seems to be misalignment of the different documents, therefore some clarifications would be required. For example, there is a footnote on p.6 of the ape monitoring protocol stating apes are not confirmed for Ndende and Mouila 3, but in the BAP it is stated that their presence is confirmed in all the concessions (Appendix 2), and in its annex 3 (i.e. residual impact assessment) it is also written ape presence was confirmed in all concessions by Borneo Futures (2021). There seems to be confusion in the frequency at which line transect surveys will be conducted, as in table 10 of the ape monitoring protocol it is mentioned they will be conducted every 5 years, but in table 16 of the BAP it is indicated the frequency will be every 3 years. It would be good to revise the documents to ensure their content is aligned.

Given that this is the first large-scale agribusiness project that aims to align with IFC PS6, and that there are no long-term studies on the impacts of oil palm development on apes in Africa, it would be important for the project to include a research component, particularly to increase our knowledge on: the potential emergence of pathogens in highly fragmented and agricultural landscapes; the impact of trenches on ape movement, the effect of intensive pesticide/fertilizer use on apes, and the use of oil palm plantations by apes.

Specific comments on:

1) OPG's BAP

As you know, robust ape survey data are essential to adequately apply the mitigation hierarchy. The project may be able to refine its mitigation strategy once more data on apes are collected, so we commented on the current application of the mitigation hierarchy by OPG. The proper implementation

of the mitigation measures proposed are also dependent on the human and financial resources that have been planned and ensuring that the staff receive appropriate training. Here are more specific comments on each step of the mitigation hierarchy:

a) Avoidance

The main avoidance measure adopted by OPG was first to select areas for its plantations that were thought to be more degraded (e.g. closer to roads) and that aligned with national recommendations, and the creation of set-asides in each of its oil palm concession. The selection of set-aside was done without having collected detailed ape survey data, thus we cannot state if these were the optimal locations to avoid significant impacts to apes.

b) Minimisation

Different minimisation measures have been proposed in the BAP.

- **Hunting & logging:**
 - It is unclear how OPG will control access and resource intake from local communities in the set-aside.
 - It has been reported that Olam's employees have been selling bushmeat to restaurant owners around Mandji in 2021, thus it is unclear if the proposed mitigation measures are efficient, or if they are not well implemented.
 - OPG needs to work more closely with ANPN and "Eaux et Forêts" to control hunting and logging within their concessions.
 - PROLAB is an existing initiative that is already active in the vicinity of OPG's concessions. What is the status of PROLAB II that could be extended to OPG's concessions? Is OPG still considering a partnership with PROLAB?
- **Disease and pathogens:**
 - The potential for disease transmission from humans to apes is high given that apes are using some of the plantations and use habitats at their periphery. Only one measure was included in the BAP which is to develop a code of conduct. What about access to latrines by employees? Vaccination program for employees? Or other mitigation measures as presented in the IUCN Best Practice Guidelines for Health Monitoring and Disease Controls in Ape Populations. We would also like to know if Olam has implemented further measures during COVID-19 and if there is a plan in place to respond to further pandemic outbreaks.
 - The risk of air, water and soil pollution through the use of pesticides and fertilizers is important to consider for apes, and does not appear to have been well mitigated. Pesticides can leak into the environment over long distances (i.e. several kms). Local communities living in the vicinity of OPG's concessions have already complained about fish dying in their rivers which could be linked to the pollution of their watercourses from OPG's activities. This would warrant further investigation.
 - Additionally, pathogens and disease emergence are more likely with deforestation and in a more fragmented environment. It is not clear to us how Olam is monitoring this threat and is prepared to respond accordingly.

c) Restoration

Only one restoration measure is presented for Makouké. What about old roads that are not in use anymore, such as in Ndende? Are there plans to rehabilitate these roads, riparian corridors and abandoned trenches in other concessions?

d) Offset

The ARRC task force believes the residual impact assessment greatly underestimated impacts to apes for the following reasons:

- OPG considers its indirect impacts close to null, mainly based on forest loss data. However, other indirect impacts, such as hunting, fragmentation, and edge effects, are not discussed. We believe the impacts of the oil palm plantations on apes are not circumscribed within their boundaries, but that these impacts do extent beyond the plantation limits. For example, apes that were using the areas that are now planted were pushed into neighboring ape's home ranges, and for the highly territorial chimpanzees this very likely has led to intergroup conflicts leading to the death of individuals in neighboring communities. Furthermore, indirect signs of hunting activities were only monitored within the set-asides, but an increase in hunting in the vicinity of Kango or Makouke as a result of in-migration linked to the project is possible and has not been investigated. It is also likely that the local communities shifted hunting activities to other locations.
- Apes do use different habitat types, and usually their home range comprises varied habitat types. We do not agree to only consider impacts to terra firma forest to assess impacts to apes. Furthermore, the ape density estimates used to calculate the number of apes impacted include whole ape home ranges including different habitat types. If an ape density for terra firma forest only was used, this density would have been much higher.
- Using the precautionary principle, we would ask the project to include the whole area planted as having had an impact on apes and include indirect impacts in its new residual impact assessment. The ape density to use in this assessment can be lower for Mouila 3, Makouke and Ndende, but higher for Awala, Mouila 1 and 2.
- The task force does not agree with the lack of multipliers in the calculation of the offset requirement. Not all multipliers are discussed, and certainly the time-lag in achieving gains is important to consider, as well as the uncertainty of ape density prior to the project taking place. The net gain target is also unclear (i.e. 5% or 25% more gains than with no net loss) as with the period targeted to achieve these gains (it is assumed a 50-year period was used=duration of the project).
- The ARRC Task Force is strongly encouraging projects to plan for sustainable and long-term contributions to ape conservation (longer than the project duration), given that some of the impacts the project has incurred on apes is permanent.

We understand the different offset options presented are aimed to benefit several species, however when we consider apes separately, we do not feel the options presented would approach no net loss and far from a net gain for apes. Moukalaba-Doudou NP (MDNP) already receives funding, so we would need to see the additionality of OPG's offset for this area. The 'domaine de chasse' at the periphery of

MDNP is mainly comprised of savanna habitat and would not bring many gains for apes. Given that OPG has increased the fragmentation effect for apes, we are supportive of initiatives that aim to improve connectivity in ape populations. However, the corridor proposed around Pongara would need to extent much more inland, as currently it is linking Awala HCV to the mangrove part of Pongara NP, not used by apes. More offset options should be investigated, such as supporting the protection of the proposed MDNP-Waka NP corridor. Once the ape residual impact assessment and offset requirement are re-estimated, more sizeable and adequate offset options should be proposed for apes.

2) OPG's ape and elephant baseline monitoring protocol

We were not sure why the document is called 'baseline' monitoring protocol, this term could be removed. Overall, we agree with using a mix of survey methods, however we have the following comments:

- The area to target for surveys should extend beyond the limit of the concessions given that ape's home ranges do not stop at the boundaries of the concessions, and it is imperative to understand ape's movement in relation to the project area, and other disturbances in the vicinity of OPG. For example, ape density could be increasing within the set-asides, but this could be linked to deforestation occurring outside of concessions.
- We appreciate that the project is aligning its monitoring program with national initiatives. However, some of the methods and protocol are different. Did relevant stakeholders confirm that the data collected by OPG will be included in these national initiatives?
- The document only mentioned the SECR method for estimating ape abundance with camera-traps, which require identification of individuals, however the more recent camera-trap distance sampling method does not required identification of individuals and could be used in this area.
- If the project uses line transects, it should conduct its own nest decay study.
- Please clarify survey frequency. As mentioned above, it is written in some instances that the line transects will be conducted every 3 years and in other places every 5 years. The same applies for the interviews, are these one-off events or will they be repeated? Will local villagers also be interviewed as in the document it sounds like only the plantation workers will be interviewed?
- Does OPG have enough staff to conduct all these activities? Can they not partner with ANPN or other NGOs to conduct the line transect surveys every 5 years?

We remain available to answer any further questions and clarifications you may have. We would appreciate reviewing revised versions of the BAP and ape monitoring protocol, as well as remaining informed on the monitoring progress, the BAP's implementation and during the offset feasibility study.

Sincerely,



Dr Genevieve Campbell

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