

**ARRC Task Force's comments on 'Sierra Rutile's 2021 Annual Chimpanzee Survey
and Monitoring Report'**

22-02-2022

Thank you for sending 'SRL's 2021 Annual Chimpanzee Survey and Monitoring Report'. We were pleased to see that SRL was able to collect more chimpanzee baseline data throughout 2021, and that different complementary methods were used. However, as mentioned in our comments dated 15-03-2021, the project has not yet developed a complete BMEP with indicators and thresholds which would be needed to assess the effectiveness of mitigation measures and allow for adaptive management. The current BMEP (an appendix to the BAP), only describes in further detail some of the activities in the BAP, rather than the additional activities needed to evaluate whether or not mitigations interventions achieve their intended outcomes. It is thus difficult for the ARRC task force to evaluate the project's progress in 2021. Completing the BMEP should be a priority and we also have several comments that would require the project's immediate attention:

- The project needs to define relevant indicators and thresholds to allow for monitoring the chimpanzee population and their threats in 2022. The project should also determine how they can quickly react when a threshold is broken. The task force will not review any new monitoring report until we have seen the updated BMEP.
- Monitoring should also be used to assess the effectiveness of mitigation measures, but it doesn't seem like any chimpanzee mitigation has been implemented in 2021.
- It is quite worrisome to read that chimpanzees continue to be captured, killed, and kept as pet (or likely to be traded) in the mining concession and its vicinity. It is not clear to us how the project is trying to reduce this threat, except for sending these orphans to Tacugama Chimpanzee Sanctuary. We were wondering also if SRL is supporting TCS financially as it is quite costly to rescue and then care for orphan chimpanzees, which is a commitment of many years.
- We would like to be informed of the project's 'offset' progress and be provided with a clearer timeline. Given the lack of implementation of mitigation measures by the project and continued pressure on chimpanzees, we would recommend the project to revisit their offset requirement. We would also like to see the avoidance analysis that was done by the project.

Overall, we found that the report includes many unsupported and somewhat misleading information or conclusions, and lacks scientific rigor. For examples, 1) no conclusion on seasonality can be drawn as not all grid cells were surveyed each season (it would also be useful to specify what months correspond to what season); 2) Habitat preference cannot be established on percentage use alone but needs to be measured and assessed statistically, accounting for habitat availability which needs to be quantified, i.e. are habitat types used disproportionately more or less relative to availability; 3) definitions of habitat types should be given. It is assumed the same categories as what is used in the BAP were used, but it is somewhat confusing to report a nest on a road, we assume this was in a degraded forest along the road; 4) it can't be stated that the Mobimbi chimpanzee community is decreasing; the results of two different methods were compared, each having a really low survey effort and sample size, so they are not directly comparable; different methods are used to complement each other.

Many questions and drivers of chimpanzee's threats remain unanswered. For examples, is it possible to know in advance where people will place their annual crops? Are chimps persecuted because they forage on crops or are killed as a by-product of snare hunting? What is the percentage of hunting with snares? Where does snaring mainly occur (e.g. around crops)? What is the behavior of chimpanzees when crossing the roads, and the behavior of the local population and drivers?

Specific comments on the report

The task force also had more specific comments on the report:

- The area of impact of the project does not coincide with the concession boundaries. We would therefore like the project to conduct their surveys keeping in mind the impacts on chimpanzee communities and not at the spatial scale of the mining concession.
- The project needs to identify the botanical species used by chimpanzees, as these species should be used in the rehabilitation effort.
- How is the information on chimpanzee crossings provided by local informants corroborated?
- Could more details be provided on the camera trapping methodology, e.g. number of functional deployment days and trapping rate of chimpanzees across each location, and how for example, chimpanzees are identified and by whom?
- The number of camera traps is too small for obtaining a sufficient sample size to monitor the chimpanzee populations. We would therefore encourage significantly increasing camera trapping efforts which would also allow for impact monitoring and evaluation on chimpanzees.
- Have there been any more primate surveys for the other species triggering Critical Habitat?

We look forward to receiving an updated BMEP and more information on the chimpanzee mitigation measures that have been implemented so far, as well as the progress with the project's offset.

Best regards,

ARRC Task Force's panel