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BY EMAIL

Dear ARRC task force,

At the end of 2021, Sierra Rutile Limited (SRL) finalized a 2021 Chimpanzee Survey and Monitoring Annual Report. We want to thank the Task Force for its feedback and constructive comments on this report both during the online meeting, and in the written comment. This feedback was helpful and the Task Force's suggestions were and will be taken into consideration when possible, in particular with the 2022 BAP update.

To answer the Task Force's questions on the Annual report and better understand how SRL have or will be taking commentary into consideration for the 2022 BAP update, we have outlined below a response to each of the questions / comments.

If the Task Force would like to convene with a follow-up call or discuss any additional feedback, we would be happy to arrange a suitable date and time. Otherwise, as committed during the call, we will send the Task Force a framework for updated the Biomonitoring and Evaluation Plan for 2022.

With best wishes,

Jessica Ganas-Swaray, PhD
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cc: Conrad Savy, IFC (csavy@ifc.org)

Task Force comment	SRL response
General	
<p>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:</p>	<p>Per discussion during the Teams meeting, a template will be developed that will highlight how the BMEP will be updated with this approach. This template will be sent for review in July 2022 to the Task Force and with an agreed upon approach, the BMEP will be updated accordingly by end Q4 2022.</p>
<p>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.</p>	<p>Noted. This framework will be in place at the 2022 BAP update.</p>
Specific comments:	
<p>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.</p>	<p>A Community Conservation and Biodiversity Protection Strategy was developed in 2021 which outlined planned mitigation efforts. As part of that, SRL is currently finishing up a social survey collecting information on community environmental perceptions, land use, and hunting to enable informed and meaningful mitigation programmes to be developed. In the meantime, there are two mitigation actions currently in various phases of development.</p> <ol style="list-style-type: none"> 1) Environmental education: Tacugama Chimpanzee Sanctuary was selected as a service provider. SRL is currently working to see how this proposed program can be implemented in 2022.

Task Force comment	SRL response
	2) Woodlots: SRL is currently exploring options of creating woodlots to reduce pressure on the forest habitats
<p>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.</p>	<p>One planned mitigation measure for this particular threat to Chimpanzees is a thorough environmental education program in Area 1, placing an emphasis on Chimpanzee conservation. This programme is currently under development with Tacugama Chimpanzee Sanctuary as the service provider.</p> <p>SRL in the past has donated funds to Tacugama.</p>
<p>We would like to be informed of the project's 'offset' progress and be provided with a clearer timeline.</p>	<p>As discussed in the Teams meeting, the offset strategy is being revised as SRL considers other areas to rehabilitate given the decision to not use Motinga pond for rehabilitation. The rehabilitation strategy will be updated in the 2022 BAP.</p>
<p>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.</p>	<p>See above. We have not yet conducted an avoidance analysis but this will be included in the BAP 2022 update.</p>
<p>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);</p>	<p>No definitive conclusions on seasonality were provided in the report. To make solid conclusions on seasonality, SRL would be required to survey 60 grids per season (total 120 1 km² /yr). SRL's Biodiversity team does not have the manpower to conduct this many recces. Forthcoming reports will emphasise where limitations of the data occur and what that means for study conclusions.</p>

Task Force comment	SRL response
<p>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;</p>	<p>The report does not use the terminology “habitat preference”. The report discusses what habitats the Chimpanzees <i>chose</i> and stated that choice is influenced by a range of factors, of which SRL does not have data. We understand data are limited and this is the result of the limited availability of the biodiversity team to conduct fine-grained survey and habitat availability/quality studies while balancing all BAP obligations.</p>
<p>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; .</p>	<p>Yes, habitat types mentioned were those used in the BAP. The next report will include the types and definitions.</p> <p>There are no nests found along a road. Chimpanzee records found along the road are those of Chimpanzee road crossings, and the map indicates this by a particular symbol found in the legend.</p>
<p>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.</p>	<p>The report does not state that Chimpanzees are decreasing. It suggests it is a possibility along with the caveat: <i>The results of the upcoming genetic analysis, which will also use the 2019 data, coupled with more camera images over time, will help elucidate whether the group may have had a reduction in size in the last two years.</i></p>
<p>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?</p>	<p>A land use map with these data were meant to be produced last year, but unfortunately, the external consultant tasked with this work package did not collect the necessary data. Moving forward, we aim to collect these data in house, toward mid year.</p>

Task Force comment	SRL response
	Information on other drivers are being collect as part of a environmental social survey currently being conducted.
Are chimps persecuted because they forage on crops or are killed as a by-product of snare hunting?	It is likely the latter, but SRL currently do not have quantitative data to support this conclusion. Qualitative data (e.g. household questionnaires) also suggest that they are a by-product.
What is the percentage of hunting with snares?	<p>Percentage of hunting sign: 90% of all signs recorded were snares.</p> <p>We are currently undertaking a social survey to understand local hunting behavior, including hunting methods. These results will be provided in the 2022 Annual Chimpanzee survey and monitoring report.</p>
Where does snaring mainly occur (e.g. around crops)?	Snares are recorded along recces and ad libitum. When a human disturbance variable is recorded, a record of the habitat type is noted, but not adjacency to crops. Anecdotally, snares do not seem to be tied exclusively to crops. We will consider adding a variable to the data collection regime to indicate adjacency to farms / crops.
What is the behavior of chimpanzees when crossing the roads, and the behavior of the local population and drivers	SRL does not have observational data of Chimpanzees crossing the road. From discussions with local community members, people simply observe the Chimpanzees as they cross the road and do not shout or threaten them otherwise. There are no data currently available to understand drivers. Lack of suitable habitat / food availability can be considered one major factor causing them to cross the road consistently over time.

Task Force comment	SRL response
<p>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.</p>	<p>Noted. In 2021, due to COVID company protocols, SRL staff were required to stay inside of Area 1. As restrictions ease, and balancing all the obligations of the Biodiversity Action Plan, the biodiversity team will aim to keep this in mind as mitigation programs are considered.</p>
<p>The project needs to identify the botanical species used by chimpanzees, as these species should be used in the rehabilitation effort.</p>	<p>Noted. Food and nesting tree species utilized by West African Chimpanzees at other study sites as well as tree species surveys conducted as part of the Area 1 ESHIA were reviewed and the rehabilitation nursery team were advised of these species. Efforts were and are being made to include these species in the forest rehabilitation efforts. The Biodiversity team is also working to learn tree species. Currently over 50% of Chimpanzee nests are located in Palm trees which are readily identified.</p>
<p>How is the information on chimpanzee crossings provided by local informants corroborated?</p>	<p>There is one trusted community member SRL Biodiversity staff have been working with since 2019. This person was trained on data collection methods, and he gathers data on road crossings by both self-observation and daily discussions with various community members.</p>
<p>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?</p>	<p>SRL will aim to provide such details in the 2022 Annual report.</p> <p>Dr. Jessica Ganas- Swaray, an experienced primatologist carefully inspects photos and videos to identify individual Chimpanzees.</p>

Task Force comment	SRL response
Biodiversity Monitoring & Evaluation Program	
<p>The BMEP seems to be more of a framework than a working document ready for the company to implement. Targets have not been clearly defined so it is unclear how adaptive management will be applied.</p>	<p>Noted. Due to the lack of baseline data, targets and timelines for the BMEP were not yet developed. However, they will be included in the next revision of the BMEP (Dec 2022)</p>