



Subject: Concerns over impacts on the Tapanuli orangutan and its habitat of the mining activities at the Martabe Gold Mine in Indonesia

March 28, 2024

To whom it may concern,

The ARRC Task Force would like to raise concerns over recent news of the resumption of mining exploration activities undertaken by PT Agincourt Resources in the Critically Endangered Tapanuli orangutan (*Pongo tapanuliensis*) habitat in Sumatra, Indonesia. There are less than 800 Tapanuli orangutans left in the world and given their slow reproductive rate, any impact on their population is taken very seriously and is a threat to their survival. The area where exploration activities are resuming also overlaps with a Key Biodiversity Area (KBA) and an Alliance for Zero Extinction (AZE) area, which highlights the uniqueness and importance of the area not only for orangutans, but for other endangered species.

We have summarized our concerns below:

- **Transparency:** ARRC has tried without success to gain access to orangutan survey data within the mining permit. The project hasn't shared sufficient data with stakeholders to allow them to engage with the project in a meaningful way. Indonesia subscribed to the 'Extractive Industries Transparency Initiative (EITI)' in 2020 which promotes transparency in the extractive sector. We found that this project fails to align with the country's commitments.
- **Conflict of interest:** as previously mentioned, the 'independent' biodiversity advisory panel set up by the project is reviewing its own data and is paid by the project. The panel has a vested interest in the project and is benefiting directly from the proposed offset and additional conservation activities, which further enhances the conflict of interest. It is therefore worrisome that this panel has cleared exploration activities to resume inside the KBA and orangutan habitat.
- **Extent of impacts:** there is a lack of understanding by the project on the extent of mining impacts on orangutans and biodiversity in general. The impacts are not limited to the habitat clearance. Noise, habitat fragmentation, potential disease transmission, pushing orangutans closer to human settlements which can lead to negative interactions between people and orangutans, are some of the many more impacts the project has and will have on orangutans and their habitat. These will extend several kilometers away from the active mine area. Agincourt seems to downplay these impacts, and to our knowledge has not yet implemented any orangutan specific mitigation measures.

- **Absence of a “Monitoring & Evaluation Program”**: the company has not conducted any monitoring of its impacts on orangutans to date. This is a crucial part of demonstrating that mitigation is effective and in general alignment with International Finance Corporation (IFC) Performance Standard 6 (PS6) (see IFC GN89).
- **Greenwashing**: the scale of impact on orangutans has not been reviewed externally or independently, and we have serious doubts that the proposed offset will be sufficient to compensate for impacts the mine has had on orangutans and their habitat up until now, and related to upcoming mining activities. The project is planning to fund conservation activities supported by some of their panel members without proper stakeholder consultation. The Batang Toru Ecosystem Alliance (BETA), a coalition of NGOs working in Batang Toru with a vision to conserve the sustainability of the Batang Toru landscape, is developing an action plan for the Tapanuli orangutan and they haven't been contacted. In our view, this should have been the first group to approach and consult with if the project was serious about managing and offsetting its impacts on orangutans in a meaningful and long-lasting way.

We would like to reiterate that the Martabe mine is not aligning with IFC PS6 and we found it misleading for their investors and other stakeholders to state so on their website.

Best regards,



Dr Genevieve Campbell
Lead of the ARRC Task Force