

Visit to WCS/Rio Tinto Simandou railway March 1-3 2023, Republic of Guinea

Report from the IUCN SSC PSG SGA ARRC Task Force¹ dated July 26th 2023

Context

The ARRC Task Force is an initiative of the IUCN SSC PSG SGA that aims to improve mitigation of impacts of industrial development projects on apes.

The ARRC Task Force was invited by Winning Consortium Simandou (WCS) to visit sections of the proposed ca. 700 km railway for the evacuation of iron ore planned to be exploited in the Simandou range. Simandou is a 110-kilometre-long mountain range located in the Nzérékoré and Kankan regions of south-eastern Guinea in the Guinée forestière region of the country. The whole project is located within the range of Critically Endangered Western Chimpanzee's (*Pan troglodytes verus*), with significant impacts to its population living in various habitat types and regions of Guinea, from savanna woodland to forested areas. Both Rio Tinto and WCS hold mining permits in Simandou, and given that WCS and Rio Tinto are now in a joint venture, Rio Tinto also took part in this visit.

The ARRC Task Force has previously declined to engage formally with WCS because they couldn't fulfill the criteria for engagement (e.g. no possibility of applying fully and properly the mitigation hierarchy; breaking national law by starting construction before completing an Environmental and Social Impact Assessment (ESIA) as required by Guinean law; no robust baseline data collected on chimpanzees before construction began). This visit was in response to an invitation from WCS to the ARRC Task Force to observe the mitigation measures that had been put in place so far and to make recommendations to reduce the project's impacts on chimpanzees. This visit was not part of any official engagement or relationship between ARRC and WCS.

¹ International Union for Conservation of Nature (IUCN), Species Survival Commission (SSC), Primate Specialist Group (PSG), Section on Great Apes (SGA), ARRC (Avoid, Reduce, Restore and Conserve) Task Force

Itinerary

Date	Time	Agenda
01-Mar-23	06:30 AM	Departure Conakry (Route:Conakry-Coyah-Kindia-Madina Oula-Tunnel)
	12:30 PM	Arrival at WCSr PMO (Entry Gate of Kindia Tunnel)
		Working lunch
	02:00 PM	Presentation, WCSr: Project management, HSEC measures, Biodiversity actions
	03:00 PM	Discussion
	03:30 PM	Visit Kindia Tunnel area (Facilities: Camps, Tunnel, Crushing Station, Storage area, Concrete Batching Plant, etc)
	05:00 PM	Daily summary, discussion, Break
	06:30 PM	Working dinner, WCSr PMO camp
		Stay overnight at WCSr PMO camp
02-Mar-23	07:30 AM	Breakfast
	08:00 AM	Visit Section 4, Lolo river (elephant passage), facilities of Section 4 Presentation section #4, discussion
	12:00 PM	Working lunch at Main Camp Section 4
	1:00 PM	Presentation section #4, discussion
	02:00 PM	Leaving for Mamou tunnel, visit access road Farintah, Mamou tunnel construction facilities
	05:00 PM	Arrival at Mamou tunnel section camp (CRCC11) Break, daily summary
	06:30 PM	Working dinner, CRCC11 camp
		Stay overnight at CRCC11 camp
03-Mar-23	07:30 AM	Breakfast
	08:00 AM	Visit Section 5 (Pinselli forest, Kaba Tunnel, Soyah Tunnel, camps etc.)
	11:30 PM	Arrival at Section 5 main camp (SDHS camp)
		Debrief lunch at main camp Section 5
	1:00 PM	End of mission

General observations

The ARRC Task Force was happy to receive an invitation from WCS to encourage greater transparency in their project and receive advice from different stakeholders. Unfortunately, the ARRC Task Force noticed that significant impacts to chimpanzees and their habitats have already occurred and will be difficult to mitigate.

Areas particularly sensitive for chimpanzees that the railway alignment crosses include the Kounounkan area, the tunnel regions and the Pensilli-Soyah-Sabouyah future National Park. It is likely that these areas are also sensitive for the Endangered *Colobus polykomos* and *Piliocolobus badius/temminckii*, but no data were collected by the project on these species. The tracing of the railway alignment within and in proximity to the future Pensilli-Soyah-Sabouyah National Park is already having a significant impact on this area, for example the Pensilli Classified Forest has now been fragmented by the project clearing part of the forest in a chimpanzee territory for the railway alignment (Figure 1). We observed significant in-migration, especially close to WCS's camps, and increased activity in the project's area of influence because of induced access (creation of access roads with unrestricted use). We noted that the road upgrades done by the project for access to the railway alignment have significantly reduced travel time from Mamou to Farintah, which in turn has enhanced ease of access to this previously enclaved region. We observed numerous logging trucks, charcoal production sites and charcoal bags for sale, as well as new constructions extending between Mamou and Farintah. A baby chimpanzee has recently been captured near new settlements on the Mamou-Farintah road, which highlights the increasing pressure on chimpanzees and their habitats, and highlights the urgency to implement mitigation measures.



Figure 1: Nests of chimpanzees observed close to the clearing for the rail alignment in Pensilli Classified Forest

We also noted a high number of access roads leading to nowhere, reflecting poor planning and design, with a disregard for the resulting significant environmental impacts that such roads present in the landscape. We also observed that, as best practices would require, none of the abandoned roads had been rehabilitated and that erosion alongside some of these roads is very noticeable, which could also impact streams and rivers nearby.

During our visit, no robust chimpanzee baseline data were yet available, although plans were made for chimpanzee surveys to be undertaken in the coming months. Considering the environmental damages and impacts to chimpanzee habitats which have already taken place with construction proceeding without any mitigation plans in place, it must be emphasised that such 'baseline' data will not adequately reflect the initial state of the chimpanzee population 'pre-impacts'. It should be noted that once the 'baseline' data is completed, the project will need to continue to monitor the

chimpanzee population within the project’s area of influence by implementing a ‘Chimpanzee Monitoring and Evaluation Plan’.

Recommendations

We are making here some recommendations based on our field observations. Some of these are similar to other recommendations already emitted to WCS by other stakeholders; however, we did not see that corrective measures had been implemented, so we are also repeating recommendations that WCS may have already received from third parties. We have separated our recommendations according to direct and indirect impacts.

DIRECT IMPACTS

IMPACT	RECOMMENDATIONS
Habitat loss & fragmentation associated with access roads and railway	<ul style="list-style-type: none"> ● Restrict road width and Right of Way to a minimum during design and construction, and re-adjust the width of already constructed roads (the roads are way too wide at the moment). ● Avoid alignment of any future access roads within or close to gallery forests, forest patches or areas exhibiting signs of chimpanzee usage (if WCS builds more access roads moving forth). ● Avoid placing construction debris around large trees (Figure 2A). ● Immediately rehabilitate all access roads that have been abandoned or that will not be used for maintenance and operational purposes once usage is completed. ● Reinforce traffic and speed limit controls, e.g. equip all vehicles with digital tachographs and drivers with cards which can be blocked after a set number of infractions to facilitate monitoring and sanction implementation. ● Set clear time windows when no traffic is permitted (e.g. night time) except in cases of emergency (predictability helps facilitate movement of wildlife and chimpanzees). ● Avoid/reduce any unnecessary traffic during construction and operation. ● Adequate placement of underpasses (sufficiently high and wide for passage of elephants too, to be determined by specialist studies) over rail and maintenance roads.
Impact on water resources: Sedimentation and blockage of waterways	<ul style="list-style-type: none"> ● Deploy measures to reduce sedimentation across all impacted waterways. ● Implement appropriate engineering measures (culverts sufficiently large etc.) to ensure continued water flow across both permanent and temporary waterways (these need to be mapped appropriately during rainy and dry season if not completed yet).
Erosion along roadsides	<ul style="list-style-type: none"> ● Implement erosion reduction measures, e.g. netting or other measures to prevent rock fall and landslides in steep areas (urgently needed prior to rainy season) (see Figure 2B). ● Rehabilitate all roadsides whether temporary or permanent to reduce risk of erosion.

IMPACT	RECOMMENDATIONS
Habitat degradation, loss & fragmentation associated with camps, borrow pits, quarries and dumping sites	<ul style="list-style-type: none"> ● Avoid placing any infrastructures in chimpanzee territories, dispersal corridors or current/future protected areas (employ the most up-to-date maps and all baseline data available and conduct thorough pre-construction surveys). ● All borrow pits, quarries and dumping sites should be strategically located and designed to avoid and reduce impacts; these should not be placed in protected areas or areas used by chimpanzees. ● Rehabilitate or reclaim all sites immediately after closure using best practices.
Disturbance: Worker presence	<ul style="list-style-type: none"> ● Minimize worker presence at construction sites. ● Ensure that codes of conduct (inclusive of code for drivers) and protocols are in place² with induction training and regular repeat of training (e.g. with quizzes). ● Clearly communicate and enforce sanctions for non-compliance to code of conduct. ● Avoid activity at night as much as possible. ● All camps should be equipped with ashtrays outdoors and indoors. ● Staff should be prohibited to smoke in vehicles (huge risk of igniting fires if ashes are dispensed through the window). ● Staff should be provided with portable ashtray to prevent accidental fires linked to cigarette smoking.
Disturbance: noise & dust	<ul style="list-style-type: none"> ● Ensure all equipment and machinery are fitted with noise and dust reduction technology. ● Reinforce traffic and speed limit controls (see above) and encourage predictability of traffic during operation and maintenance. ● No blasting at night.
Disease transmission	<ul style="list-style-type: none"> ● Portable latrines and garbage disposal units available in all areas where workers are active. ● Staff vaccination programme (COVID19; polio, tetanus, measles, mumps, rubella, hepatitis A and B, yellow fever, meningococcal meningitis and typhoid). ● Need a plan to encourage staff self-declaration of ill-health without penalising workers. ● Protocol in place and disseminated appropriately to all staff and camp residents as to what do to do or not to do when encountering the carcass of a dead animal, especially a chimpanzee³.

² The code of conduct should include prohibition for staff to capture, hunt, purchase or consume chimpanzees and other bushmeat.

³ Including if staff encounter dead or injured ape.



Figure 2: Pictures illustrating some of the direct impacts observed during our visit: A) Rocks and other debris placed at the bottom of a tree; and B) Erosion along access roads.

INDIRECT IMPACTS

IMPACT	RECOMMENDATIONS
Facilitation of access associated with access roads: logging and charcoal production; agricultural activities, hunting	<ul style="list-style-type: none"> Urgent need for placement and operationalisation of strategically placed multi-partner (OGPNRF/Eaux et Foret, WCF, WCS/Rio tinto) control posts with clear mandates (permission for placement and assessment of needs are to be made immediately to reduce any administrative delays; temporary posts need to be put in place in the interim until formal implementation completed as impacts are already visible). This would need to be done in Kounoukan, tunnel areas and in Pensilli-Soyah-Sabouyah future National Park.
Influx of people and 'spontaneous' settlements	<ul style="list-style-type: none"> Construction of camps for all staff and families and any permitted vendors, that include all necessary facilities (e.g. latrines, health center, shops). Control of access to camps for 'residents' only (e.g. through access cards).
Increase in negative interactions between people (local, immigrants and staff) and chimpanzees (risk of killing and capture of chimpanzees, attacks of chimpanzees, chimpanzee crop foraging)	<ul style="list-style-type: none"> Avoid unnecessary felling of nesting tree species and fruit trees or vines of importance to chimpanzees or elephants to maximally preserve their natural food resources to minimise risks of crop foraging. Essential to avoid and minimise impact on waterways as outlined above; loss of water resources could attract wildlife closer to human settlements or water sources/points used by people hence increasing risk of encounter between people and wildlife, including chimpanzees and elephants. Awareness raising concerning laws relevant to chimpanzees, their behaviour, and how to and not behave when seeing chimpanzees.
Disturbance to chimpanzee behaviour, movement and ecosystem associated with increase in fires	<ul style="list-style-type: none"> Understand main reasons for fires. Identify solutions to resolve the root causes for setting fires (e.g. livestock herders, slash and burn). Set up fire brigades comprised of local villagers. Develop with relevant stakeholders plans for early fires ('feux précoces') to reduce damage caused by fires later in the year.
Disease transmission	<ul style="list-style-type: none"> Installation of latrines in villages within project's Area of Influence. Protocol in place and disseminated to local villagers as to what to do or not to do when encountering the carcass of a dead animal, especially a chimpanzee.
Trapping, hunting and capture of chimpanzees	<ul style="list-style-type: none"> Support OGPNRF/WCF patrols in OKKNPS landscape in protected areas within project's Aol. Sensitization campaigns in villages conducted by appropriate and competent entities.



Figure 3: Pictures illustrating some of the indirect impacts observed during our visit: A) Temporary camps set up next to WCS's camps by workers, people looking for work, vendors, etc; and B) Charcoal for sale along WCS's access road in Kounounkan area.

Gaps in the links between social and environmental impacts

During our visit, based on the presentations we attended, it was apparent that there are significant gaps in the understanding and assessment of social impacts and linkages with downstream impacts on the environment and potentially on chimpanzees. These gaps include:

- Demographic information concerning immigration into the project's Area of Influence (AoI) and what attracted them to relocate 'spontaneously' to the area in the first place; why they came, expectations and where they come from? (immigration from Sierra Leone doesn't seem to have been taken into consideration by the project);
- It was unclear whether any data have been gathered at the village-level within the project's AoI on demographics, livelihood activities across gender, reliance on Non-Timber Forest Products (NTFPs) and natural water sources, and an assessment of livelihood challenges;
- Drivers of forest fires and an evaluation of risks to villagers from their perspective and gathering of villagers' proposed solutions to this issue to develop a realistic and timely action plan to best manage fires (telling villagers not to set fires is completely ineffective); and
- Evaluation of current chimpanzee-people interactions and crop foraging by chimpanzees (and elephants): where, when and what? and people's tolerance vis a vis encounters with chimpanzees (and elephants) and crop consumption.

Such gaps need to be filled by qualified partners using appropriate approaches and questioning to avoid inadvertently exacerbating an existing situation, creating a problem where none existed before, or generating false expectations.

Urgent actions needed

We observed direct impacts still not being managed by the project (e.g. erosion along roads), and normally these type of impacts should be easier to control, so we would expect the project to remedy to this situation as soon as possible.

It is more difficult to tackle indirect impacts, and this is why it is recommended to anticipate such impacts and implement minimization measures before construction begins with the help of qualified specialists. We have identified a set of priorities we feel are urgent to address before construction resumes and no later than September 30th 2023:

- **Active control of access roads:**
 - Traffic posts controlling access and passage of vehicles (both project and others) for the illegal trafficking of natural resources (especially important in the Kounounkan, tunnel areas and Pensilli-Soyah-Sabouyah). Mobile units should also be trained to supplement the permanent posts.
 - Establishment of a card system for access along control posts for workers and local residents.
 - It is critical that all temporary associated infrastructures such as access roads, camps, quarries be rehabilitated as soon as possible.
 - The main access road which runs along the rail line should if anything only be used for railway and tunnel maintenance purposes. Its width must be reduced to the minimum necessary.
 - Traffic along the main access road should be managed and controlled, for use only by maintenance and emergency staff and local residents in collaboration with relevant government body representatives and partners as relevant. In biodiversity sensitive areas (i.e. Critical Habitat), the access road should be removed where possible.

- **Management of in-migration:**
 - In-migration into areas of construction of the rail, especially next to WCS's camps, and the network of access roads facilitating access to previously enclaved areas urgently needs to be addressed. Establishment of control posts (mobile and/or permanent) comprised of staff with a mandate to enforce the law can be one of the solutions. The construction of staff lodgings with canteen and sanitary facilities, with a restricted access for workers only, will help to manage influx. A card system could help control access to the area by workers and local residents.
 - There needs to be a project in-migration's plan that is implemented and monitored.

- **Wildlife crossings:**
 - During the construction phase, all agreed upon and planned suitable wildlife crossing structures need to be put in place and should be monitored to first make sure they have been appropriately constructed, and then used by wildlife, especially chimpanzees.

- **Implementation of management plans:**
 - Several minimization measures were presented during the visit but had not all been implemented. It is urgent to implement the different management plans and recommendations received by stakeholders and monitor chimpanzee populations to

ensure their effectiveness. If necessary, the project needs to increase its biodiversity team and the resources devoted to these aspects.

- The subcontractor structure represents a challenge for WCS when it comes to ensuring implementation and enforcement of policies given the high number of subcontractors. The subcontractors need to run effective and regular staff training programs on environmental and biodiversity management, in coordination with WCS. The project should also require clear communication of policies to all personnel, and explain sanction procedures in the event of non-compliance, which could be audited by a third-party.
- **Chimpanzee monitoring:**
 - Develop a Chimpanzee Monitoring and Evaluation Plan using the state, pressure, response framework and define clear indicators and thresholds. This plan should be implemented as soon as possible.

The ARRC Task Force is happy to receive any supporting documents that prove that WCS is tackling these main issues, as well as those recommended by other stakeholders, and that it is implementing mitigation measures to reduce its impacts on chimpanzees.

Useful resources

- The SGA and ARRC Task Force have developed COVID-19 guidance for industry personnel, applicable to energy, extractives, transport infrastructure, agro-industry and other projects operating in great ape habitats: <https://www.iucngreatapes.org/covid-19>
- Gilardi, K.V., Gillespie, T.R., Leendertz, F.H., Macfie, E.J., Travis, D.A., Whittier, C.A. & Williamson, E.A. (2015). Best Practice Guidelines for Health Monitoring and Disease Control in Great Ape Populations. IUCN SSC Primate Specialist Group, Gland, Switzerland. <https://www.iucngreatapes.org/health-monitoring-and-disease-prevention> (Information on disease risks and measures for mitigating risks of disease transmission)
- Macfie, E.J. & Williamson, E.A. (2010). Best Practice Guidelines for Great Ape Tourism. IUCN SSC Primate Specialist Group, Gland, Switzerland: <https://www.iucngreatapes.org/great-ape-tourism> (Information on vaccine requirements for staff health programmes)
- State of the Apes from the Arcus Foundation; Volume 1 on Extractive Industries and Volume 5 on Infrastructure Development available here: <https://www.stateoftheapes.com/>