

Additional comments by the IUCN SSC ARRC Task Force on the Kinguelé Aval Project (BAP version 5)

26/02/2021

General comments

Thank you for considering and responding to our comments dated September 23rd 2020. We appreciate the Project's efforts to improve its mitigation strategy for apes, and we were happy to see the Project undertaking further baseline surveys before the start of construction, which have now confirmed the presence of both the Critically Endangered Western Lowland Gorilla (*Gorilla gorilla gorilla*) and the Endangered Central Chimpanzee (*Pan troglodytes troglodytes*) within the Project area. Confirming presence is the first step, however obtaining relevant data to inform mitigation requires significant survey effort. Two additional survey campaigns are planned in 2021 before construction begins, and specific comments on these surveys are given below.

As part of this Project there will be unavoidable direct impacts from the flooding of ape habitat for the reservoir, but it is the effectiveness of mitigation measures that will influence the level of indirect impacts on the ape population living inside and outside the Monts de Cristal National Park. This ape population belongs to an 'exceptional' ape priority landscape, and there are concerns from the incremental impacts from all projects occurring and planned within this landscape. Therefore, whenever possible we would encourage the Project to support common mitigation measures with other companies and NGOs active in the landscape to better manage cumulative impacts.

As the relationship between the Project and the ARRC Task Force evolves, we would appreciate being involved and approached for inputs at an earlier stage before the final decision-making is made. Twice we were contacted just before surveys were about to start with little room to make any changes. We would also prefer that the Project presents its responses to our comments in a separate document.

Specific comments

Baseline surveys

The additional camera trapping planned in 2021 will help gather more information on the ape population using the Project area, however important data needed are: 1) the number of ape groups using the area; 2) their composition and size; 3) their home range/territory boundaries; and 4) botanical species used by apes for feeding and nesting. Additional methods, such as recces, would help to complement the data collected by the camera traps to help answer these questions and to obtain further insights into the ape population using the Project area. At the moment the current survey design probably doesn't encompass entire home range/territory, so the additional data being collected will help support the development of the long-term monitoring plan.

In general, the Project seems to be drawing hasty conclusions. At this point we can't say how many apes and ape groups are using the Project area. Seeing one ape on a camera trap picture doesn't mean there is only one ape using the area, as there are seasonal variations in grouping patterns and camera traps often capture only part of a group. Chimpanzees, for example, have a fission-fusion social system

whereby they split into smaller parties at different time of the year or day, which could influence how many individuals are captured on camera trap pictures. The number of apes identified to date should also be interpreted with caution, as normally several ape experts need to cross-reference the identification of individuals on pictures to ascertain their identification. Furthermore, we can't say yet with total confidence that apes do not cross the different rivers in the area, including the Mbé river. We agree that the Mbé river appears quite large in the Project area, but in certain locations there are rocks and 'beaches' that can be exposed in the dry season which could be used by apes to cross.

This rapid interpretation of results translates in the text on p.110:

“Sur la base des résultats qui précèdent, le paysage du projet constitue probablement une zone périphérique du domaine vital d'une à deux communautés de Chimpanzés (ouest et est de la Mbé), et un espace de transit pour quelques individus de Gorille.

Néanmoins, dans une lecture rigoureuse de la Norme de Performance 6, la zone de projet s'inscrit donc à la marge d'un habitat critique pour les grands singes à l'échelle du Parc National des Monts de Cristal et de ses abords.”

The Project is located in ape habitat, and thus in Critical Habitat, and we would therefore prefer the following wording:

“Sur la base des résultats qui précèdent, le paysage du projet constitue une zone à faible densité de grands singes à comparer à d'autres zones du Parc National des Monts de Cristal.

Néanmoins, selon les lignes directrices de la Norme de Performance 6, le projet se situant dans l'habitat des grands singes, la présence de ces espèces déclenche l'habitat critique”.

Mitigation measures and compensation plan

- Several of the mitigation measures proposed will benefit great apes, however there are not enough details provided to reassure the reader that these will be effectively implemented and monitored, especially in the 'Plan Opérationnel de gestion de la biodiversité' to be used by the constructor. For example, it is mentioned on p.28 that 'surveillance des défrichements' will take place. However how will this be achieved? Using satellite images? This is not specified, and this is also the case for other measures which would benefit from having more details to increase the chances that the constructor will properly implement them.
- A possible increase in bushmeat hunting should not only be controlled by conducting patrols along roads and erecting random check points. The Project should also support ANPN to conduct more patrols within the Project area. This is not considered a compensation measure but should be done to mitigate potential indirect impacts from the Project.
- Employees should be vaccinated against Covid-19 when this will be possible, but in the meantime, the Project should also ensure that their vaccination record is up to date as other diseases can spread to great apes, such as polio and measles.
- A particular concern is the use of subcontractors by the constructor. In that case, the employees can change frequently so there is less control to what they do and how much they are aware of the Project's mitigation measures.
- It is not possible for the Task Force to comment on the current proposed compensation plan as impacts to apes have not been quantified yet. Impacts to habitat has been estimated, but for

apes we will expect the Project to estimate residual impacts to apes in terms of individuals and number of communities impacted.

- The Project has estimated that impacts to apes are 'negligible' (Tables 18&22). We do not agree with this assessment as we do not have enough baseline data to understand the total magnitude of impacts to apes (e.g. flooding core or peripheral areas of their home range; fragmentation effect), but we already know that there will be loss of ape habitat, therefore this should be at least labelled 'faible' in the best outcome scenario.
- The Task Force supports compensation measures that are financially sustainable and leads to the protection of apes in perpetuity. For this Project especially, having impacts on a National Park that in theory would provide long-term protection to its ape population, the compensation cannot be the temporary protection of area that is given a lower protection status.

Additional comments

We look forward to seeing the results of ongoing surveys to help develop the long-term monitoring plan for apes in the Project area. We would also like to review the draft BMEP once this will be available.