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Dr Genevieve Campbell
Lead, IUCN SSC PSG SGA ARRC Task Force

Dar-es-Salaam, 19th March 2024

REF: RESPONSE TO ARRC COMMENTS RECEIVED DECEMBER 2023

Dear Genevieve,

The Project sincerely thanks the ARRC Task Force for the comments provided on 14th December 2023. Furthermore, the presence and engagement of the ARRC Task Force at recent workshops and online meetings is greatly appreciated. The comments received are useful and, in many ways, reflect the outcomes of recent discussions regarding ongoing assessments of impacts on Chimpanzees and the resultant mitigation and offset strategies. There are some slight divergences though, and some omissions from the comments that we had hoped to see following our most recent call. I address these in the brief points below.

Roads

It is important to note that upgrading of existing roads, or construction of new roads is the responsibility of the Ugandan National Roads Authority (UNRA) and that the Projects therefore have no direct control over their development. However, the risks they pose to the Chimpanzees in the northern Albertine region is clear. As such, it is recognized by the Projects (Tilenga and EACOP) that the implementation of mitigating measures is necessary.

It is also important to note that engagement with UNRA is ongoing. This has resulted in some improvements, but the implementation by UNRA of most of the potential and more substantial mitigations has not taken place. A key reason for this is thought to be that requests to UNRA to implement mitigation have been made on an *ad hoc* basis. The Projects are therefore of the opinion that the development of a Northern Albertine Rift Chimpanzee Action Plan (NARCAP) will provide the context for mitigating infrastructure impacts (not only the roads that can be considered associated facilities) on chimpanzee ranging behaviour and lend weight to proposals. The plan would include and formalize the approach, and allow for all stakeholders, not just the projects, to put pressure on UNRA to implement the identified mitigations. A unified approach is far more likely to be effective.

For both the Projects, surveys are being undertaken (Tilenga) or are planned and budgeted (EACOP) to better understand the impacts of infrastructure development on chimpanzee ranging behaviour. The outcomes of these surveys will provide the foundation for both mitigation and offset strategies for the direct impacts as assessed in the Projects' CAPs and as well as a holistic and comprehensive strategy that will be incorporated in the landscape action plan (NARCAP).

Indirect Impacts

As acknowledged by ARRC, the Projects are taking a co-ordinated and landscape-level approach so that indirect and cumulative impacts (arising from the oil and gas Projects in the region together with other reasonably foreseeable/ planned developments) can be addressed with input from all key players. These indirect and cumulative impacts will be addressed in the NARCAP, as discussed in the most recent call and confirmed in the ARRC comments. This work has been initiated and is building on the specific actions being implemented by Tilenga, EACOP and CNOOC for the respective projects. It is envisaged the implementation of conservation actions by the individual projects will transfer to the NARCAP upon completion with a clear monitoring and evaluation framework in place to deliver the

respective offset obligations for the projects and to demonstrate additionality in line with IFC Performance Standard 6

The northern Albertine rift is under significant pressure from industrial development but even more so as a result of habitat modification by a rapidly growing human population (around 3% per year) and large-scale agriculture (e.g., sugarcane farming). This view is shared by the projects' Independent Biodiversity and Livelihoods Advisory Committee and is referenced in their 2022 annual report. Based on the resulting rapid habitat conversion and the recognition that the development and implementation of the NARCAP will take time, the interim step of taking immediate actions to address the project's impacts is justified. This step allows for phased implementation of mitigations, building the capacity of implementing partners and facilitating the support of other stakeholders so that a consolidated and coordinated approach can be applied through the NARCAP.

It is therefore expressly stated in the EACOP CAP that the offset strategy will not be considered complete until the NARCAP has been finalised and the Projects are implementing those activities identified as their responsibility. In this context it is important to note that not all components of the NARCAP will be the responsibility of EACOP, Tilenga and Kingfisher and that other stakeholders will also have to play a significant role. This underlines the necessity for extensive consultation during the development of the NARCAP in order to understand and engage all parties with a vested interest in conserving the chimpanzee population and habitats within the landscape, but also to ensure a participatory approach is taken to manage indirect and cumulative impacts and associated mitigations as they cannot be addressed by the projects in isolation.

Direct Impacts

EACOP was hoping for comments back on the approach in the CAP regarding the proposed measures to address direct impacts. It was mentioned that ARRC would provide specific points to address, or specific guidance on how the approach could be changed to the satisfaction of the ARRC Task Force. These would be helpful and will also allow the LESC to see constructive engagement between the Project and the Task Force.

The Task Force's preference for using Chimpanzee numbers to guide offset requirements, rather than the extent and suitability of areas impacted as a proxy has been noted; we too see the benefit in this approach. However, the extent of areas occupied by Chimpanzees, coupled with their suitability provides a basis for deriving an initial estimate of how much replacement habitat might be needed to support an increased population. We have communicated the intention to test these estimates in terms of outcomes at population-level (for example by ensuring that the current population has access to sufficient undisturbed habitat, nesting habitat, feeding habitat, water etc., with NARCAP's landscape approach providing further guidance and assurance to achieve gains.

Further research on Chimpanzee numbers and distribution has been initiated allowing for a rationalization of the assumptions made for population gains in the CAP and subsequent incorporation in the NARCAP. This will undoubtedly result in refinements of the strategies started under the CAP and define those to be included in the NARCAP.

Liaising with NARCG

Consultations have been ongoing with the NARCG throughout development of the CAP to ensure it aligns with goals/priorities of NARCG organisations working in the landscape (plus to ensure 'additionality' of the offset measures). This work is a key element and will be continued throughout the development of the NARCAP. The NARCAP will reference the goals and objectives of the National Chimpanzee Conservation Strategy (NCCS) and align with these as much as possible. Indeed, the EACOP CAP already references relevant sections of the NCCS and states where measures work towards delivery of NCCS objectives.

NARCAP

A NARCAP Coordinator has been identified to initiate the development of the NARCAP.

The NARCAP is intended to support multi-partner collaborative and integrated actions, building on proven, community-based initiatives and scaling them up. It will act as an implementation mechanism

for agreeing shared objectives, defining responsibilities of partners, allocating funds and tracking outcomes. The NARCAP will be developed to align with Uganda's National Chimpanzee Conservation Strategy and implement appropriate actions in the Northern Albertine Rift to help deliver the aims of the Strategy.

The NARCAP Coordinator will:

- Work with companies wishing to offset their impacts on chimpanzees and ensure that the appropriate steps have been taken to avoid and minimise impacts through the mitigation hierarchy.
- Initiate establishment of an independent technical steering committee and coordinate its activities, to ensure that best available knowledge and expertise is used to define needs, confirm objectives and identify actions.
- Act as a key point of contact for partners and stakeholders and communicate the purpose and objectives of the NARCAP to achieve mutual understanding and collective "buy-in".
- Consult with ARRC Task Force regarding ongoing requirements to improve baseline understanding and the status of chimpanzees across the Northern Albertine Rift.
- Convene consultations, discussions, meetings and field visits as needed to provide opportunities for consensus-building and knowledge-exchange.
- Review the current conservation status and plans for restoration of chimpanzee habitats in Bugoma, Wambabya and Budongo, to see how the NARCAP could/should best support the NFA.
- Work with NARCG, and other NGOs and partners involved with agroforestry and sustainable agriculture initiatives in the landscape, to ensure alignment across sectors and develop appropriate interventions that support communities and private forest owners to retain forests and chimp populations on private and communal lands.
- Coordinate review/ update of cumulative threats and pressures affecting chimpanzee populations from planned and reasonably foreseeable future developments, including details of activities, proponents, anticipated timing and scale, likely implications for conservation. Involves engagement across projects and with other development proponents and GoU.
- Explore suitability of the Uganda Biodiversity Fund as a vehicle for finance administration.
- The proposal also makes provision for some technical assistance, including development of indicators, updates to net positive forecasts, GIS and mapping and allows for the Project Officer to divide their time between the UK and Uganda.

Yours faithfully,



Wendy BROWN
General Manager