

April 15, 2025

SENT VIA EMAIL

Subject: Summary of findings and request for response: report on environmental and human rights impacts of the nickel industry in Halmahera, Indonesia

Dear Virginie De Chasse, Marie-Axelle Gautier, Berengere Papin, and Sol Castagnino,

I am writing on behalf of Climate Rights International, an international NGO that conducts research and advocacy on the human rights dimensions of the climate crisis. We will soon publish a report on the continuing human rights, environmental, and climate harms associated with nickel mining and smelting at and near the Indonesia Weda Bay Industrial Park (IWIP). This report follows our "[Nickel Unearthed](#)" report, which we published in January 2024 and previously discussed with you.

Our forthcoming report, which is based on interviews with local community members and company, media, and NGO reports, finds that community members living near IWIP continue to face serious human rights and environmental harms due to industrial mining and mineral processing operations. As mining and mineral processing activities continue to expand, those impacts are worsening. There is also no evidence that those whose lands have been taken by the nickel industry have been fully compensated, or that there has been accountability for the human rights and environmental harms community members have suffered.

We want to ensure that our report accurately reflects the views, policies, and practices of relevant authorities and companies, and we hope that you or your representatives will respond to the following questions, outlined below. Any responses will be reflected in our reporting as appropriate, and we may publish your responses at our discretion and when appropriate, either in full or in part.

1. What steps has Eramet taken to address the human rights and environmental impacts related to Weda Bay Nickel's mining and smelting operations in Halmahera since January 2024?
2. What steps has Eramet taken to ensure that community members have received full compensation for their lands, including Indigenous communities' customary lands, from Weda Bay Nickel?
3. The Eramet website states that, "Weda Bay mine operations are not responsible for pollution of the Sagea River. In accordance with Weda Bay Nickel's Environmental and Social Impact Assessment and Environmental and Social Management Plans, water quality is regularly monitored, including by qualified third-party inspection entities. The monitoring program is approved by the Indonesian national licensing authorities and is drawn up in consultation with national and local authorities. Sensors are installed in

various areas to monitor water quality in downstream river discharges. The data recorded by the sensors is transmitted to government authorities. National and local authorities monitor and inspect on a regular basis.”

- a. Please provide documentation of the water quality monitoring program, including the location sites for sampling, the results of the tests on those samples, and any other results of the monitoring program.
 - b. Does Eramet or Weda Bay Nickel have any plans to make this data publicly available and accessible to local communities? If no, why not?
4. The Eramet website states that, “To date, there is no evidence that members of the O’Hongana Manyawa community are living in voluntary isolation in or around the Weda Bay concession. If the presence of groups living in voluntary isolation is demonstrated, Eramet will ask PT Weda Bay Nickel to refrain to any contact and not to engage in an FPIC process with them, in line with international standards.” The website further states, “The Indonesian government does not recognize the O’Hongana Manyawa community as an “indigenous group”. Nevertheless, since 2012, PT Weda Bay Nickel decided to set up an active engagement program with this community located within the concession perimeter, and in accordance with Indonesian law, Weda Bay Nickel’s mining activities are subject to in-depth consultation with local communities, including this community. Since 2012, the company has maintained mutually accepted exchanges with the community groups present in the vicinity of our mining activities.”
 - a. Please explain what the “in-depth consultation” with the community entails and when it began. Is it Eramet’s position that this consultation is part of the process of obtaining Free Prior and Informed Consent from the community?
 - b. What evidence has Eramet and/or Weda Bay Nickel gathered to support the statement that there are no members of O’Hongana Manyawa living in voluntary isolation in or near the mining concession?
 - c. Please clarify if Eramet’s position is that there are no O’Hongana Manyawa living in voluntary isolation.
5. Since the June 2024 announcement that the Sonic Bay project would not move ahead, Climate Rights International has seen media reports that Eramet may increase other investments in Indonesia’s nickel industry, including through additional mining projects or investments into Huayou Cobalt’s HPAL facility located at IWIP. Please provide a list of all Eramet’s current and planned investments in nickel mining and/or processing in Indonesia.

Please provide your responses in writing. Your responses can only be considered for inclusion in the report if we receive them by April 30, 2025. Please reply in English at info@climate-rights.org, copying info@climate-rights.org. In addition, please include any other materials, statistics, and/or information you think may be relevant.

I would also welcome the opportunity to speak with you or your representatives. Please let me know if you have any questions or if you would like to arrange a meeting or video conference.

Sincerely,

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Brad Adams
Executive Director, Climate Rights International

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