

Intended for

International Finance Corporation; United States International Development Finance Corporation; BNP Paribas; ING Bank, a branch of ING-DiBa AG; Natixis; and La Banque Internationale pour le Commerce et L'Industrie de la Guinée 'BICIGUI SA'

together, the Original Lenders and other Lenders as defined in the common terms agreement dated 2 September 2016 (as amended and restated on 6 September 2017, and as further amended and restated from time to time) to be entered into between, among others, the Original Lenders, the Bank of New York Mellon and Compagnie des Bauxites de Guinée from time to time (the "Common Terms Agreement").

Date

**July 2021**



Project Number

**1620009030**

# **CBG BAUXITE MINE ENVIRONMENTAL AND SOCIAL MONITORING REPORT – MARCH 2021**

**CBG BAUXITE MINE  
ENVIRONMENTAL AND SOCIAL MONITORING REPORT  
– MARCH 2021**

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### Appendix 1

Virtual Site Visit itinerary

### Appendix 2

Key Project Documentation made available for Review

### Appendix 3

Status of Issues Identified in Preceding Monitoring Visits

## ACRONYMS & ABBREVIATIONS

AMR	Annual Monitoring Report
BAP	Biodiversity Action Plan
BGEEE	Bureau Guinéen d'Études et d'Évaluation Environnementale
BMS	Biodiversity Management System
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
CBG	Compagnie des Bauxites de Guinée
CFB	Chemin de Fer de Boké
CFP	Chance Finds Procedure
CHMP	Cultural Heritage Management Plan
CR	Community Relations
CTA	Common Terms Agreement
DFC	US International Development Finance Corporation
EEM	CBG's Environmental and Social (E&S) Consultants
EHS	Environment, Health and Safety
EIG	Economic Interest Group
EMTL	Environmental Monitoring Team Leader (previously the post was referred to as 'Environment Manager')
EPCM	Engineering, Procurement and Construction Management
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
E&S	Environmental and Social
ESMP	Environmental and Social Management Plan
GIS	Geographic Information System
GoG	Government of Guinea
H&S	Health and Safety
HR	Human Resources
HSE	Health, Safety and Environment
HSE&S	Health, Safety, Environment & Social
HSECQ	Health, Safety, Environment, Communities and Quality
HSECQ MS	Health Safety Environment, Communities and Quality Management System
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
KBA	Key Biodiversity Area
KPI	Key Performance Indicator
LDP	Land Disturbance Permit
LTI	Lost Time Injury/Incident

AMR	Annual Monitoring Report
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan
LTIR	Lost Time Injury/Incident Rate
LWC	Labour and Working Conditions
M&E	Monitoring and Evaluation
MoC	Management of Change
MoU	Memorandum of Understanding
MS	Management System
Mtpa	Million tonnes per annum
MUOA	Multi-User Operator Agreement (regarding the railway capacity expansion project)
MS	Management System
NO	Nitrogen monoxide
NoCo	North of Cogon
NO <sub>2</sub>	Nitrogen dioxide
NO <sub>x</sub>	Oxides of nitrogen
NGO	Non-Governmental Organisation
N&V	Noise and vibration
NVMP	Noise and Vibration Management Plan
O <sub>2</sub>	Oxygen
PAP	Project-Affected Person
PbP	Plateau-by-Plateau
PM	Particulate matter
PM <sub>10</sub>	Particulate matter 10 micrometres or less in diameter
PM <sub>2.5</sub>	Particulate matter 2.5 micrometres or less in diameter
PS	Performance Standard
Ramboll	The company fulfilling the role of IESC
RAP	Resettlement Action Plan
REB	Réseau Environnement Bauxite (The Bauxite Environment Network)
RN	Route Nationale
SCP	Streamlined Compensation Process
SEP	Stakeholder Engagement Plan
SMB	Société Minière de Boké - Winning Consortium
SO <sub>2</sub>	Sulphur dioxide
SOP	Standard Operating Procedure
tph	Tonnes per hour
TMP	Transitional Measures Plan (MUOA Project)
TRIR	Total Recordable Incident Rate

AMR	Annual Monitoring Report
VSV	Virtual Site Visit
WBG	World Bank Group
WMF	Waste Management Facility
WMP	Water Management Plan
WWTP	Wastewater Treatment Plant



## EXECUTIVE SUMMARY

Ramboll UK Limited (Ramboll), was commissioned in September 2016 by Compagnie des Bauxites de Guinée (CBG) to undertake environmental and social (E&S) monitoring of the 18.5 million tons per annum Mine Expansion Project (the 'Expansion Project'), Guinea.

In fulfilling the role of Lenders' Independent Environmental and Social Consultant (IESC), Ramboll has a duty of care to the Lenders to the Project, including the Policy Lenders comprised of the International Finance Corporation (IFC), US International Development Finance Corporation (DFC), formerly Overseas Private Investment Corporation, and UFK/Euler Hermes (UFK), together the 'Policy Lenders', and a consortium of commercial banks (collectively with the Policy Lenders referred to as the 'Lenders').

The IESC's scope of work allows for two in-country monitoring visits each year during construction of the Phase 1 Expansion and/or during the Sangarédi to Kamsar railway upgrade associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes health, safety, environmental and social matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG HSECQ Department and are managed under the same environmental and social management system. This report provides the findings of a site visit undertaken in March 2021, however, due to COVID-19 related travel restrictions in force at this time, travel to site was not possible. Ramboll, therefore, undertook a Virtual Site Visit (VSV), basing its findings on remote interview, document review and photographic evidence. A similar approach was adopted for the preceding July 2020 monitoring report.

The VSV was undertaken prior to the receipt of the 2020 Annual Monitoring Report (AMR) which is due in late April 2021. However, data used to compile the AMR, for example monitoring results, were provided along with the Borrower's Quarterly E&S Compliance Certificates for Q4 2020. A series of technical meetings were undertaken over a one-week period during the week commencing 8<sup>th</sup> March 2021. The meetings were held via conference calls involving representatives from Ramboll, CBG and the Policy Lenders. To the extent possible, CBG presented photographic evidence and presentational material in support of its HSE&S performance in addition to supporting documents and other materials in response to information requests made by the IESC/Policy Lenders.

During the VSV, the following topics were investigated:

- The implementation of the Environmental and Social Action Plan (ESAP), as amended in late 2020 following lender agreement to finance the MUOA Project;
- CBG's response to COVID-19 and the implications of COVID-19 for CBG's operations;
- The adequacy of the HSE&S Management System(s) (MS);
- The implementation of the suite of environmental and social (E&S) management plans intended to address applicable Project Standards, notably the IFC Performance Standards;
- Follow-up on those 'open' issues identified during previous site visits;
- CBG supervision/monitoring of the SMB (Société de Minière de Boké) railway<sup>1</sup> and the COBAD road;
- Occupational health and safety;
- Contractor management;
- Environmental management (air, water, waste, hazardous materials, noise and vibration);

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<sup>1</sup> A Memorandum has been signed between SMB, CBG, the Ministry of Mines and Geology and the Ministry of Environment, Water and Forests, with respect to the 10 km of railway SMB is constructing in the CBG Concession area (South Cogon). Under this agreement, CBG's undertakes regular inspection reports, which focus upon SMB's performance against the applicable HSEC standards, which are then submitted to BGEEE (agency under the Ministry of Environment, Water and Forests). Only BGEEE has the right to enforce compliance. This tripartite arrangement is facing challenges, mostly relating to compliance, but also more recently, due to COVID-19 restrictions.

- Resource use and energy efficiency;
- Labour and working conditions (LWC):
  - Dissemination of HR Manual, the Workers’ Grievance Mechanism and the Code of Ethics and Business Conduct to employees and contractors/sub-contractors;
  - Location of grievance boxes and usage;
  - Inclusion of CBG’s LWC requirements and local content into contractor and sub-contractor contracts; and
  - Senior manager responsibilities and procedure for evaluation of LWC and local content criteria in bid review/selection of contractors/sub-contractors;
- Communication plan;
- Stakeholder engagement and grievances;
- Community health and safety;
- Biodiversity, specifically;
  - Biodiversity Management System update;
  - Plateau-by-Plateau (PbP) approach;
  - Dredging and the marine environment;
  - Biodiversity inspections; and
  - Land rehabilitation;
- Resettlement issues, as follows:
  - Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP): Status, assessment and recommendations;
  - Kankalaré RAP and Livelihood Restoration Plan (LRP);
  - MUOA LRP, Thiapikouré LRP and other LRPs in preparation;
  - Cumulative impacts;
  - North of Cogon (NoCo) exploration; and
  - Capacity for implementation of resettlement actions.

Other elements that were addressed during preceding visits, where significant concerns were not raised, were not revisited.

As indicated above, the VSV focused upon a broad range of HSE&S matters. CBG has a team of Health, Safety and Environment, Community (community relations and resettlement) and Quality (HSECQ) specialists that are working to satisfy the requirements of the ESAP. Throughout the VSV, CBG cooperated fully and responded to Ramboll’s requests in relation to the monitoring effort.

A total of 51 new or updated findings (with accompanying recommendations) were identified during the VSV. Of these eight are considered to have a ‘High’ significance; 25 are of ‘Moderate’ significance and the remainder are of ‘Minor’ significance. The High and Moderate findings relate to the timing/urgency/compliance of necessary actions and are listed below.

### **High significance findings**

1. *Integration of LWC requirements in bid evaluation and contractor management. There is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are included in bid evaluations and ongoing contractor management. CBG to ensure that:*

- The bid evaluation process is amended so that the HR Department receives all bids in advance of Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee’s decision/s;

- HR department to designate a senior staff member to receive PS2 training to assist it fulfil its role (LWC) in both the contractor selection process and subsequent contractor management (latter issue to be examined during the next IESC site visit in Q3 2021);
  - All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan (with removal of LWC provisions from the Local Content Plan); and
  - The HR Manual, Workers Grievance Mechanism and the Code of Ethics and Business Conduct to be provided in all Requests for Proposals issued to prospective contractors.
2. *Environmental Monitoring Programme – use of external laboratory.* The termination of a contract with an overseas certified laboratory, and the need to find a replacement laboratory, was reported previously. In the absence of a contract with a certified external laboratory, CBG has not been able to send certain environmental samples to external laboratories for well over a year, significantly effecting the quality of its monitoring data. As reported previously, contracts with external certified laboratories should be secured as a priority to enable the resumption of the full suite of analysis specified in its Environmental Monitoring Programme.
3. *Water quality -Oil/water separator.* As previously reported, oil concentrations in treated effluent leaving the oil water separator located adjacent to the tank farm in Kamsar continue to consistently exceed applicable IFC standard. A rapid intervention plan is required to achieve compliance in the shortest timeframes possible.
4. *N&V impacts – rural areas adjacent to railway.* To date CBG has not specified feasible mitigation measures to be implemented in the event noise standards are exceeded as a result of increased ore transportation by rail. The IESC recommends the following actions are completed:
1. Confirmation of the location of sensitive rural receptors and distances from the railway line;
  2. Establishment of a robust noise and vibration data set at these locations (before train numbers further increase); and
  3. Identification of site-specific feasible mitigation measures in the event they should be needed i.e. availability of space and attitude of potentially affected parties to barriers/other measures).

The final solution could involve resettlement of affected parties. CBG should ensure alternative mitigation measures are identified to prevent the need for resettlement unless absolutely necessary.

5. *MUOA: Community health and safety.* Since the July 2020 IESC site visit, the date for completion of the installation of the new footbridges, known as passerelles, has been delayed by approximately 5 months; extending the already elevated threat to community health and safety in place since the original passerelles were removed. CBG to consider all options that could 'fast-track' fabrication and installation of passerelles, without compromising occupational health safety in the companies (contracted to fabricate/install the passerelles) and the long-term integrity of the installed passerelles.
6. *Resettlement resources and capabilities.* The expatriate Resettlement Manager has limited tenure as his current contract period expires in September 2021. There will be adverse consequences for resettlement planning and implementation if management continuity is not maintained. CBG to ensure the momentum of livelihood restoration work is not affected and give early consideration to extending or renewing his contract for a period of time that will enable all LRPs (includes the livelihood restoration component of the Kankalaré RAP) to be in place with all cash and/or in-kind compensation delivered and livelihood restoration measures being implemented effectively.
7. *NoCo Exploration.* Application of the Land Disturbance Permit (LDP) process to each annual drilling campaign means that the cumulative impact of the three drilling campaigns for three plateaux in the NoCo concession over a three-year period is not a factor in drilling campaign decision-making for each LDP. CBG to undertake a rapid cumulative E&S assessment of the exploration campaign, as if it were a single project, prior to the first E&S rapid impact appraisal. This cumulative assessment to

focus on identifying and evaluating the key risks/mitigation measures to inform the individual LDP-level E&S rapid impact appraisals.

8. *NoCo Exploration*. Exploration work in an area located north of the Cogon river, over the period 2021 to 2024, will result in land disturbance and an economic displacement impact. Currently, CBG intends to pay cash compensation after the impact occurs; a non-compliance against PS5. *Post-VSV Note: CBG has stated, verbally, that CBG will pay compensation before the economic displacement impact occurs.*

### **Moderate significance findings**

1. *Revision of Environmental Management Plans* - Certain management plans that were not affected by the MUOA Project remain unchanged since they were approved in January 2019. Reviews are therefore due and should include both an update of the content of the plan to reflect current status and thinking, and also revision of the timeframes included in the associated actions plans. All plans, particularly those not subjected to an update to take account of the MUOA project, should be reviewed and updated in line with the 2-year review cycle, as described in Section 10 of the Environmental Management Plans.
2. *Social management plans* - These Plans were approved in early 2019. It is recommended that they are reviewed and updated in line with the 2-year review cycle, as described in Section 9 of the Plans. Also, given the challenges in implementing the plans, CBG (CR team) to evaluate and amend the actions and time-scales, as necessary, considering both the results to date from implementing the existing actions and, also, emerging issues that necessitate adding new actions. The amended Plans/Action Plans must identify priority time-critical actions.
3. *Management of Change (MoC)* - The relative number of change requests for the three categories (Levels 1 – 3), combined with the relatively small number of changes since mid-2020, suggests not all change requests are being captured. CBG to repeat dissemination and awareness training of the MoC Procedure. An audit of the Procedure's implementation by different departments should be carried out by CBG to inform the extent of the Procedure's use and inform any corrective actions to improve adherence with the MoC Procedure, if required.
4. *Dredging* - The 2020 dredging campaign at the port did not strictly adhere to certain actions set out in the Dredge Management Plan (DMP). Consistent with the DMP, for future dredging campaigns, CBG to undertake: i) a complete environmental characterization of sediment (including bioassays if necessary) and ii) complete characterization of the benthic fauna, from both the dredging and disposal areas. The properties of the dredged material (including toxicity) and sensitivity of the receiving disposal site (benthos) to be established in a timely manner, particularly if the previously unused A4 disposal location is to be used in 2021. Furthermore, the turbidity sampling protocol should be reviewed and revised as necessary to ensure monitoring results capture any elevated turbidity levels and sampling methodology is consistent with the DMP.
5. *Emergency Response Planning* - CBG's current Emergency Response Plan (ERP) does not recognise interaction with certain third parties, including GAC. The ERP to be revised in recognition of third parties involved/impacted by CBG's emergency response planning. This will include: communications protocols; and in the case of oil spills (and other scenarios as applicable), the sharing of response personnel and resources.
6. *Implementation of environmental management plans* - The CBG environment team is generally behind schedule in its implementation of the multiple actions specified in environmental Action Plans. Whereas the IESC notes renewed momentum following the recruitment of a new Environmental and Monitoring Team Leader (EMTL), there remains a lot of priority actions for 2021. As indicated above, all Action Plans (appended to the various Environmental Management plans) should be updated to include realistic schedules. The rescheduling should clearly prioritise time critical actions.

7. *Environmental monitoring – disclosure of results.* Disclosure of environmental monitoring data to affected communities is occurring in some instances, for example, the results of noise and vibration measurements in mining areas but remains inconsistent across CBG’s broader activities. Close interaction between the EMTL and the Community Relations team is required to identify disclosure priorities and improve disclosure of monitoring results. Such reporting of results must be consistent with the commitments made in the Stakeholder Engagement Plan as described in the IESC’s July 2020 monitoring report.
8. *Waste management* - The Waste Management Plan dated January 2019 does not recognise CBG’s longer term strategy to deal with waste generated in Kamsar. The Waste Management Plan should be updated to reflect CBG’s current waste management strategy, including the potential use of Bendougou facility and the longer-term strategy following end of Tora Bora 5-year design life.
9. *CR team recruitment.* There are several expected future work commitments that will put pressure on the existing CR team resources, potentially leaving the CR team with insufficient resources to meet these commitments effectively. The CR Manager to evaluate not only the CR team’s current and future workload, but also the geographic locations where it is likely be working, when identifying its future likely recruitment needs.
10. *Female participation in stakeholder meetings.* CBG’s initiative to increase female participation rates in community stakeholder meetings does not apply to contractors which will engage, also, with community stakeholders. CBG to require its contractors to follow its lead in encouraging enhanced female participation rates, particularly for those contractors that are involved in preparing and/or implementing RAPs and LRPs.
11. *Communications plan for 2021.* This plan does not include recent important HR documents in its employee ‘explanation’ actions. The actions presented under ‘Internal - Operational Excellence’, concerning HR documents, to be amended to show the current new key HR documents and not only older, though still current documents.
12. *Mined land rehabilitation and relinquishment.* CBG has no formal procedure for the rehabilitation and relinquishment of mined land, with respect to community involvement, despite the MRCCP presenting priority actions to develop a procedure to begin by end 2018 (with one to be completed by end 2018). CBG to initiate work immediately to formalize CBG’s current practice, for managing mined land rehabilitation and relinquishment, into a written procedure which includes not only key actions and responsibilities, but also standardized documents, to be signed by all parties, which record agreements reached/actions completed. This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP, relevant to mined land rehabilitation and relinquishment.
13. *HR Manual, Workers’ Grievance Mechanism and Code of Ethics and Business Conduct.* Actions have been taken to disseminate these three documents to employees and contractors, but dissemination is not complete. Dissemination to employees and contractors to be completed as soon as possible.
14. *Blasting.* In July 2020, the Blasting Protocol (inclusive of measures relating to community health and safety and consultation requirements) was reported to be undergoing amendment. In March 2021, eight months later, it is not yet approved. All final-stage internal CBG reviews of the Blasting Protocol to be completed, as quickly as possible, with internal approval and full implementation following immediately.
15. *Anti-malaria program.* The joint anti-malaria program (2021) has not been initiated. CBG to strengthen its efforts to persuade and then assist the Chamber of Mines to initiate the joint anti-malaria program as quickly as possible.
16. *Hamdallaye and Fassaly Foutabhé RAP.* The Fassaly Foutabhé school is not yet staffed. CBG to continue to liaise with the “*Inspection académique*” (local education directorate) to ensure allocation of teachers.

17. *Hamdallaye and Fassaly Foutabhé RAP.* i) Maize grown in the new Hamdallaye village area of rehabilitated land, allocated to gardening IGA activities, was affected by pests. CBG to ensure that its 'livelihood restoration' implementing partner, CECI, mobilizes appropriate agronomy expertise and considers use of alternative crops with better resilience to pests and mixed crops; and ii) The benefit of the 2-year fallow period on the 56 ha to be allocated to PAPs is questionable if no other measures apart from provision of topsoil are taken to improve fertility. CBG to consider use of phosphorus and potassium fertilizers, as well as "green fertilizers" to enhance the fallow period.
18. *Livelihood Restoration Plans.* There are transaction costs<sup>2</sup> to CBG arising from preparation and implementation of several separate, but similar LRPs for specific and neighbouring plateaux. For example, six LRPs will be implemented in 2021 each potentially with different implementing partners with separate contracts. CBG to consider grouping LRPs by time period rather than by plateau to avoid too many separately implemented LRPs in the future (at present, six LRPs will be under implementation in 2021).
19. *MUOA LRP.* Livelihood restoration activities are planned to start in September 2021. This date is of concern as the MUOA LRP was finalized in September 2020 resulting in a period of almost one year before livelihood restoration measures will be implemented for approximately 400 PAPs. CBG should therefore expedite appointment of an implementing partner.
20. *NoCo Exploration.* Currently, community consultations will occur after the E&S Rapid Appraisal stage undertaken for exploration activities. The draft Compensation and Resettlement Policy Framework specifies that community consultations shall occur prior to impact mitigation measures being defined. CBG to implement one round of community consultations as part of the E&S Rapid Appraisal stage, at a time which CBG considers most appropriate in the local context. CBG should confirm in writing that exploration will be delayed allowing time for necessary E&S measures, including stakeholder consultations, compensation payments and biodiversity baseline surveys to be completed. *Post-VSV Note: CBG has provided a verbal confirmation of a delay in beginning the exploration campaign. Also, CBG has indicated that its current plans are to undertake all necessary studies from July 2021 with a view to beginning exploration activities in December 2021.*
21. *NoCo Exploration.* Contractors are likely to require temporary rights to use/occupy land for fly-camps and laydown areas. CBG to ensure that agreements to use/occupy land for fly camps and temporary laydown areas are obtained and implemented in a PS 5-compliant manner whether negotiated by CBG and/or one its contractors.
22. *Resettlement resources and capabilities.* The IESC considers the Resettlement team to be under-resourced for managing the implementation of all current RAPs/LRPs plus those LRPs currently being prepared. CBG to continue to staff-up with focus on livelihood restoration and/or consider a contractual arrangement with an "implementation coordination partner" (such a partner could ensure proper coordination of the specific activities of smaller Guinean-based NGOs tasked with one or two livelihood restoration activities only).
23. *Resettlement resources and capabilities.* The Resettlement Team has a team member (services shared with the CR team) responsible for monitoring and evaluation (M&E) implementation. However, the current M&E framework, as included in the latest LRPs, is too complicated and should be streamlined focusing on a limited number of key indicators. In addition, baseline data collection and integration into a database that will enable effective M&E implementation is now a priority. CBG to simplify the M&E framework for the LRPs under preparation and start M&E information collection and integration into a database as a priority task. start collecting M&E information for RAPs and LRPs as a priority.
24. *Cumulative impacts.* There is no methodology for assessing cumulative land and livelihood impacts on the most affected communities, although CBG has obtained, recently, GIS tools that would allow

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<sup>2</sup> These costs include selection of service provider/s; negotiation of contract; supervising; and evaluating service provider performance.

such an assessment to occur. Based on the current enhanced GIS capacity and using the survey results that were presented to the IESC during the site visit, CBG to develop a methodology to assess the extent of cumulative impacts on land/livelihoods, on the most affected communities and the viability of such communities.

25. *Five Year Rehabilitation Plan*. The updated version of the plan needs to provide more detail on how CBG proposes to approach rehabilitation when topsoil is in short supply. It also needs to detail how its approach to rehabilitation will be communicated to local communities.

Although it is not a compliance issue, the IESC notes that to date, no contractors have reported COVID-19 cases despite mandatory reporting of cases to CBG being required. It is therefore important that CBG confirms that zero infections among contracted workers is correct and at the same time reiterates to contractors CBG's expectation for immediate reporting of any cases that occur.

The findings presented in this report should be incorporated within CBG's audit findings and closure process, with evidence of corrective actions submitted to the Lenders and the IESC via established ongoing liaison channels.

Of note, status updates are provided in the main body of this report for certain legacy findings; however, this is not the case for all legacy findings (where updates are not warranted). Thus, there are some historical issues, which are not highlighted in the main body of this report, that need to be fully closed. Such 'open' legacy issues are tabulated in Appendix 3.

### **Scope Limitations and Exceptions of the Assessment**

Ramboll has performed this monitoring audit in accordance with the scope of services outlined in its contract (CBG-5G-EXP1-019-G-S – Amendment No. 006-V1), dated 9th October 2020. However, as a result of the aforementioned travel restrictions caused by the COVID-19 pandemic, the IESC was unable to visit the CBG site and face-to-face interviews with third parties was not possible. Consequently, the IESC was unable to meet face-to-face with Project Affected Persons (PAPs) from the new Hamdallaye village, nor was the IESC able on this occasion to undertake a remote meeting with these PAPs. Similarly, Ramboll was unable to undertake ground truthing of its findings and instead has relied on information provided by CBG, including photographic evidence and third-party documentary evidence. The IESC intends to work with CBG to ensure that these PAP meetings occur soon and, subsequently, it will re-issue this monitoring report with an Addendum summarizing the findings from these meetings and any supplementary or amended recommendations.

## 1. INTRODUCTION

Ramboll UK Limited (Ramboll), was commissioned in September 2016 by Compagnie des Bauxites de Guinée (CBG) to undertake environmental and social (E&S) monitoring of the 18.5 million tons per annum Mine Expansion Project (the 'Expansion Project'), Guinea.

In fulfilling the role of Lenders' Independent Environmental and Social Consultant (IESC), Ramboll has a duty of care to the Lenders to the Project, including the Policy Lenders comprised of the International Finance Corporation (IFC), US International Development Finance Corporation (DFC), formerly Overseas Private Investment Corporation, and UFK/Euler Hermes (UFK), together the 'Policy Lenders', and a consortium of commercial banks (collectively with the Policy Lenders referred to as the 'Lenders').

The IESC's scope of work allows for two in country monitoring visits each year during construction of the Phase 1 Expansion and/or during the Sangarédi to Kamsar railway upgrade associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes health, safety, environmental and social matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG HSECQ Department and are managed under the same environmental and social management system. This report provides the findings of a site visit undertaken in March 2021, however, due to COVID-19 related restrictions in force at this time, travel to site was not possible. Ramboll therefore undertook a Virtual Site Visit (VSV), basing its report findings on remote interview, document review and photographic evidence provided by CBG. A similar approach was adopted for the preceding July 2020 monitoring report.

The VSV was undertaken prior to the receipt of the 2020 Annual Monitoring Report (AMR) which was due in early April 2021. However, data used to compile the AMR, for example monitoring results, were provided along with the Borrower's Quarterly E&S Compliance Certificate for Q4, 2020. A series of technical meetings undertaken over a one-week period during the week commencing 8th March 2021. The meetings were held via conference calls primarily involving representatives from Ramboll, CBG and the Policy Lenders. To the extent possible, CBG presented photographic evidence and presentational material in support of its E&S performance in addition to supporting documents and other materials in response to information requests made by the IESC/Policy Lenders.

This report provides the findings following the VSV. The VSV focused upon an assessment of CBG's E&S performance against Project commitments and applicable Project Standards, specifically, IFC Performance Standards (PSs) and applicable World Bank Group (WBG) Environmental, Health and Safety (EHS) guidelines.

As mentioned above, the IESC was unable to visit CBG's facilities which prevented face-to-face interviews with stakeholders and inspection of facilities for ground-truthing purposes. Whereas this is clearly not ideal, the IESC was able to hold detailed technical discussion with CBG representatives. Such meetings were held, primarily, with CBG staff from the Health Safety Environment, Communities and Quality (HSECQ) department as follows:

- the Health, Safety and Environment (HSE) Team including those responsible for the audit programme and environmental management and monitoring;
- Biodiversity Manager and team members
- Environmental and Monitoring Team Leader (EMTL);
- Resettlement Manager and team members; and
- Community Relations (CR) Manager and team members.



In addition, representatives from other departments/entities were interviewed or participated in meeting discussions on specific issues, as follows:

- Human Resources;
- Compliance;
- Procurement;
- Legal;
- Mining;
- Fire Department;
- Phase 1 Expansion Project; and
- Chemin de Fer de Boké (CFB).

As a result of travel restrictions caused by the COVID-19 pandemic, the IESC was unable to visit the CBG site and participate in face-to-face interviews with third parties. In its VSV itinerary, the IESC planned to undertake two remote meeting with Project Affected Persons (PAPs) from the new Hamdallaye village, as follows:

- The Hamdallaye Resettlement Committee; and
- Selected members of Hamdallaye-based Income-Generating Activities

Unfortunately, arranging these meetings proved to be impossible during both the VSV and the subsequent period leading up to preparation of this monitoring report. The IESC intends to work with CBG to ensure that these PAP meetings occur soon and, subsequently, it will re-issue this report with an Addendum summarizing the findings from these meetings and any supplementary or amended recommendations. At the time of issue, these meetings are provisionally scheduled for the 2<sup>nd</sup> August 2021.

Finally, there was an interview with a senior representative of the National Confederation of Workers of Guinea.

A team of four from Ramboll accompanied by E&S specialists from IFC, DFC and UFK, participated in the VSV meetings to assess CBG's progress towards meeting the requirements of the Environmental and Social Action Plan (ESAP), as amended in Q4, 2020 following agreement to finance the MUOA Project, the various management plans, and more broadly CBG's HSECQ performance.

Throughout the VSV, the IESC team was granted full access to CBG documentation and received good cooperation from the CBG HSECQ department/others. Members of the IESC/Policy Lender team split into sub-teams, for most of the VSV, to focus on the team members' disciplines, namely: i) HSE (excluding biodiversity); ii) biodiversity; iii) social (excluding resettlement); and iv) resettlement. This report presents key visit findings in sections that align with the IFC PSs that are applicable to CBG.

The IESC held detailed discussions on the following topics:

- General:
  - Status of the Phase 1 Expansion and MUOA projects;
  - HSECQ structure and resourcing;
  - Measures in place in response to protect the CBG workforce and communities from COVID-19;
  - Status of the SMB Rail construction (within CBG's South of Cogon concession);
  - Status of COBAD Road Operations (within CBG's South of Cogon concession); and
  - CBG exploration activities within North of the Cogon concession.

- HSE:
  - Status of HSE Management Systems;
  - H&S metrics and performance;
  - Audit and inspection programme; and
  - Implementation of Management Plans, including those relating to: Emergency Response, Air Quality, Noise and Vibration, Waste, Hazardous Materials, Dredging, Resource Use and Efficiency, Water Quality, Environmental Monitoring and Contractor Management;
  - Management of Change
- Social:
  - CR personnel resourcing/capacity development and performance of the recently installed IsoMetrix software platform for managing social and biodiversity risks;
  - Labour and working conditions (LWC) and integration of LWC requirements into bid evaluation/contractor selection and contractor management;
  - MUOA Project and community health and safety (focus upon the transitional measures to manage community health and safety);
  - Stakeholder engagement and community grievance management;
  - Implementation of Management Plans (Cultural Heritage, Influx, Community Health and Safety, Road and Railway Safety, Local Content, and Community Development);
  - Social issues in development and implementation of the 5-year Land Rehabilitation Plan; and
  - Land rehabilitation and relinquishment – community-related aspects
- Resettlement:
  - Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP): Status, Assessment and Recommendations;
  - Kankalaré RAP and Livelihood Restoration Plan (LRP);
  - MUOA LRP, Thiapikouré LRP and other LRPs in preparation;
  - Cumulative impacts;
  - North Cogon exploration; and
  - Resettlement implementation capacity.
- Biodiversity:
  - Biodiversity Monitoring Inspections of CBG;
  - Biodiversity Monitoring Inspections of SMB and COBAD;
  - Biodiversity Action Plan Update;
  - Five Year Mine Rehabilitation Plan;
  - Landscape Level Plan; and
  - Réseau Environnement Bauxite<sup>3</sup> and Collaboration with GAC.

The VSV itinerary is provided in Appendix 1.

This report focuses on the findings made during the VSV; however, it also refers to earlier reviews and reports, reflecting the ongoing nature of many ESAP deliverables and Ramboll's continuing role as the IESC in monitoring CBG's HSECQ performance.

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<sup>3</sup> The Bauxite Environment Network is a joint initiative between CBG and other Bauxite mining companies to align approaches and work holistically across the Boke region.

## 2. SCOPE AND STRUCTURE OF THE REPORT

### 2.1 VSV Scope

As a condition of the Common Terms Agreement (CTA), CBG is required to appoint an IESC to monitor (audit) and report on the implementation of the ESAP and compliance with the applicable IFC PSs and E&S commitments and in doing so, present E&S risks associated with the Expansion Project, the MUOA Project and CBG's wider operations. This report has been prepared for the attention of CBG and Lenders.

The report presents the findings of the desk-based VSV based on information gained following:

- A review of ESAP implementation;
- A review of certain HSECQ Management System documents;
- Review of recent Borrower's E&S Compliance Certificates;
- Interviews held with key HSECQ staff within CBG;
- Interviews with other CBG functions; and
- Interview with a representative of the National Confederation of Workers of Guinea.

As indicated in the Introduction above, meetings with the Hamdallaye Resettlement Committee and selected members of Hamdallaye-based Income-Generating Activity groups, could not occur. The IESC intends to work with CBG to ensure that these meetings occur soon and, subsequently, it will re-issue this report with an Addendum summarizing the findings from these meetings and any supplementary or amended recommendations. At the time of issue, these meetings are provisionally scheduled for the 2nd August 2021.

A full list of Project documentation reviewed during preparation of this report is provided in Appendix 2.

### 2.2 Project standards

In accordance with Ramboll's Terms of Reference, the Project was assessed against the following standards and guidelines:

- Applicable laws and regulations of Guinea;
- Specific commitments made by CBG and requirements specified in the ESAP;
- IFC PSs (2012):
  - PS1: Assessment and Management of Environmental and Social Risks and Impacts;
  - PS2: Labour and Working Conditions;
  - PS3: Resource Efficiency and Pollution Prevention;
  - PS4: Community Health, Safety, and Security;
  - PS5: Land Acquisition and Involuntary Resettlement;
  - PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and
  - PS8: Cultural Heritage; and
- WBG EHS Guidelines applicable to the Project.

PS7 (Indigenous Peoples) was excluded as no Indigenous Peoples are affected by the Project.

### 2.3 Structure of the report

Section 3 provides a very brief description of the Expansion Project and MUOA Project status. Section 4 describes how different levels of significance are attributed to issues highlighted in the report. The report is then structured around the seven IFC PSs applicable to the Project, as listed

above, and supporting EHS general and sector specific guidelines. The key findings identified during the audit and IESC recommendations to address them are summarised in 'significance tables' for each PS.

Appendix 3 provides a status update for the consolidated list of 'open' issues identified in the previous monitoring visits. The status of previously identified issues is categorised as either:

- Closed (with an explanation of the rationale for closing an issue);
- Open (either because no progress has been made or the IESC did not have an opportunity to revisit the issue); and
- Superseded (issues are typically categorised as superseded when an issue has evolved. In this situation, an update of the issue is provided in the main body of this report, and the previous issue as listed in Appendix 3, will include a reference to this updated text).

Within this report, the IESC has endeavoured to provide a balanced opinion, providing examples of good practice. However, due to the compliance-focused nature of this report, the broad range of aspects covered/large amounts of review documentation made available, and for the sake of brevity, the report is mostly focused on areas for improvement.

## **2.4 Limitations**

Ramboll was unable to travel to Guinea due to COVID-19 related travel restrictions.

Consequently, there has been no in-country visual inspection or ground truthing to inform this report. Therefore, the findings are based on photographic evidence provided by CBG, review of documentation and discussion with CBG representatives/other stakeholders.

### 3. PROJECT STATUS

This chapter provides a brief description of the Expansion Project status, the MUOA Project and other CBG activities ongoing at the time of the VSV.

#### 3.1 Status of the Expansion Project

The IESC's preceding monitoring report (July 2020) reported that construction of the Expansion Project was largely complete and that most of the construction contractors associated with the Expansion Project had left the site. Two activities were reported as ongoing:

1. *Construction of additional workforce housing in Kamsar is ongoing with completion expected in December 2020; and*
2. *Construction of the new Dryer 4 is ongoing/undergoing modifications and commissioning of Dryer 4 is yet to be completed.*

Construction of the workforce housing and associated road and utilities was delayed because of COVID-19 precautions. More specifically, CBG imposed a 3-month suspension of the works before restarting with a smaller socially-distanced workforce. The remaining construction work is scheduled for completion at the end of June 2021.

Testing of Dryer 4<sup>4</sup> has revealed it cannot operate at the original throughput level of 1500tph as presented in the design specification. Modifications made in early 2020 reportedly improved the throughput, although it remained well below the design specification at 900tph. At the time of the March 2021 VSV, two additional modifications were underway, including:

- Increasing the lifting capacity in the dryer (now completed); and
- Increasing the motor torque by adjusting the electrical current on the Variable Frequency Drive (VFD). This required the VFD service provider to send a technician who was unable to travel due to COVID-19 travel restrictions until 15<sup>th</sup> March 2021.

Adjustment of the motor torque was scheduled for completion at the end March 2021. *Post- VSV Note: Works were completed by end April 2021 and the dryer is operating between 1350 to 1450 tph @ 6.7% moisture with inlet moisture of 7.5 %.* Performance testing will then occur during the rainy season; in August/September when the Dryer will be used at full capacity.

#### 3.2 Status of MUOA Project

Track laying works for the double track is now completed. progress has been made in terms of purchase of reconditioned locomotives and the purchase of maintenance equipment, specifically:

- 35 km of single-track laying for the double mainline track is almost completed (99%). *Post-VSV Note: completed in May 2021;*
- 16 of the 20 'Phase 1' reconditioned locomotives were purchased ('Phase 2' will involve purchase of 5 additional locomotives); and
- Purchase of maintenance equipment is almost complete (96%).

The repositioning/installation of derailment detectors (phase 1) is due to be completed in August 2021. Eight new footbridges are scheduled to be constructed by CBG in Kamsar by February 2022<sup>5</sup> with others in Kolaboui and Tanéné to follow. *Post-VSV Note: CBG confirmed, in writing, that 13 footbridges will be constructed as follows: nine in Kamsar, two in Kolaboui and two in the vicinity of GAC mining operations near the railway.*

<sup>4</sup> Dryer 4 will operate a dust control system comprised of a multi cyclone collector followed by two Ventri-Rod scrubbers. The design outlet dust load is 150-300mg/dm<sup>3</sup>.

<sup>5</sup> Figure 3-1 (dated April 2021) indicates footbridges will be constructed by September 2021. The February 2022 date reflects a revised schedule for the construction of footbridges.

Key remaining items are: i) construction of the new locomotives workshop; and ii) installation of a new permanent signalisation system. Regarding the workshop, there has been little construction progress, however CBG expects to sign the MUOA locomotive maintenance workshop engineering services contract in July 2021. Once this contract is in place CBG will then detail and optimize the works schedule and, once that is further developed, CBG intends to sign a building contract (likely by February 2022), with all works scheduled to be completed by Q1 2023, in keeping with CBG's commitments. In the interim, the site will be backfilled.

For permanent signalisation, a contract was signed on March 15, 2021 and a notice to proceed was issued on 18 March 2021; the mobilization, engineering and surveying works are underway. Installation is now scheduled to be completed in January 2023. In the interim a temporary more manual signalisation system, relying on human communication/authorisations for train movements, is operational.

The overall progress for the MUOA Project, as of end April 2021, is calculated to be 55%. Progress per activity is shown in Figure 3-1.

### Planning Prévoir Avril -2021

Progrès Global : **55%**

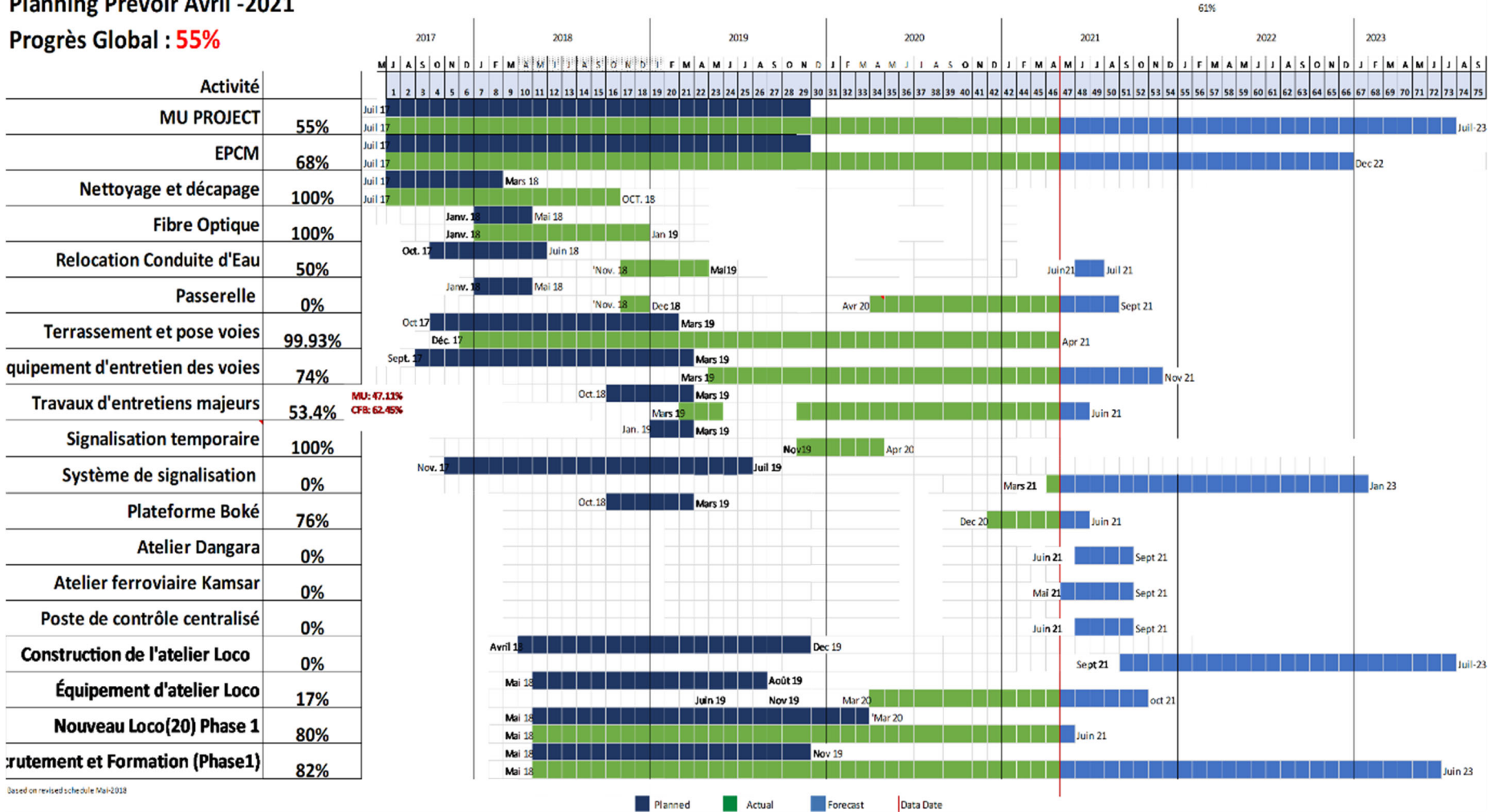


Figure 3-1: MUOA Project Progress and Revised Schedule, dated April 2021



### 3.3 CBG activities in the North of the Cogon Concession Area

The description below benefits from further information presented by CBG in a call held on 13 April 2021.

CBG wishes to implement an exploration campaign in the concession area located north of the Cogon River (NoCo) over the period 2021 to 2024. Figure 3-2 shows that exploration will be carried out at three plateaux. Figure 3-3 shows the approximate location of the exploration area (yellow superimposed line<sup>6</sup>) in relation to Sangarédi. The plateaux are located, approximately, between the villages of Kolodyi and Horé Sapi and there are at least seven villages located on/near the plateaux.

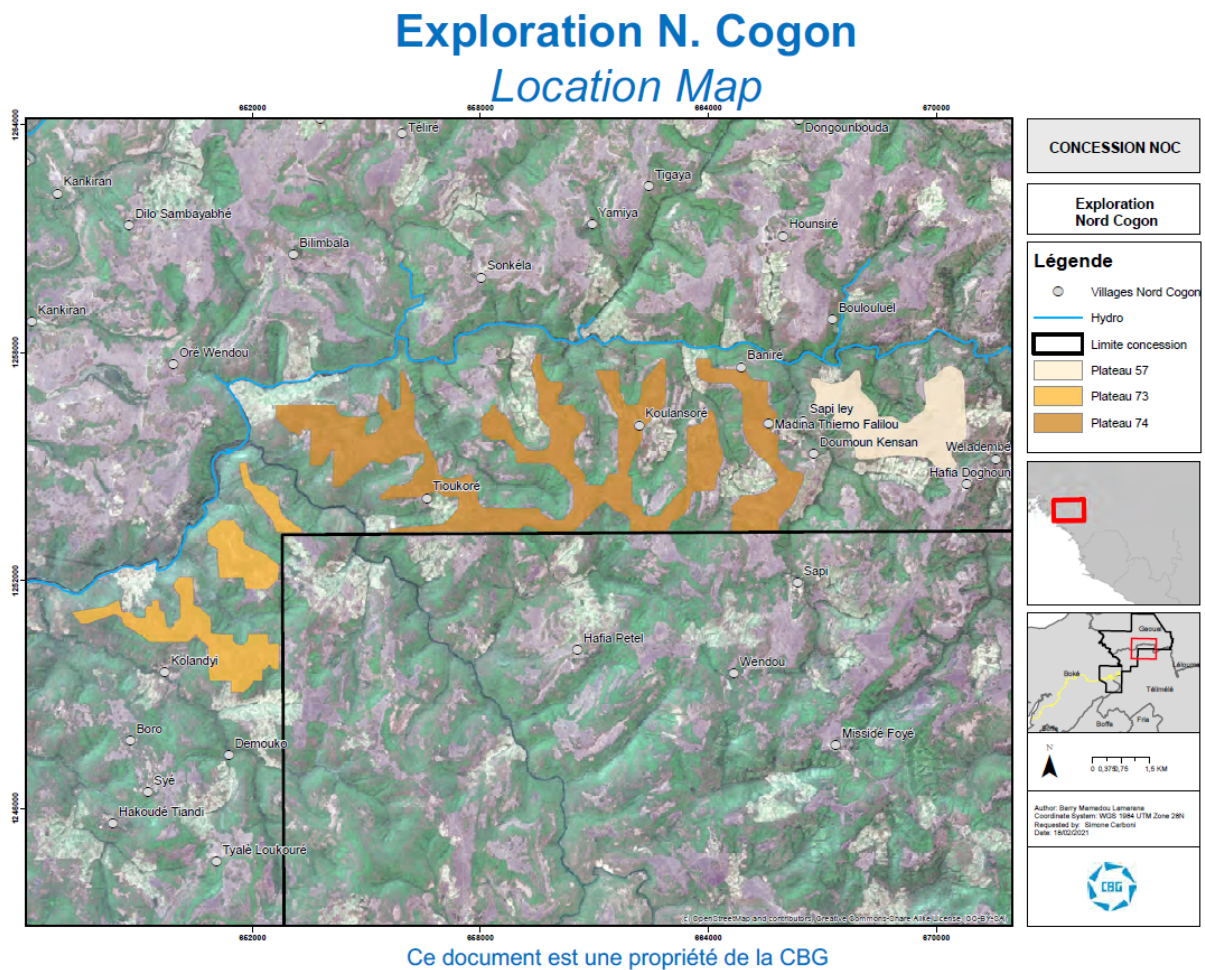


Figure 3-2: Location of the three exploration plateaux

<sup>6</sup> This line is hand-drawn and indicative only. It must not be assumed to be accurate delimitation of the exploration area,





**Figure 3-3: Appropriate exploration area in relation to Sangarédi**

These three plateaux contain 'indicated' bauxite reserves and the planned exploration will enable CBG to determine whether they are 'probable' reserves. Exploration will be undertaken at selected points along a series of predetermined grids over all three plateaux concomitantly. The grids (essentially the drilling locations) are altered, probably annually, so that the data obtained becomes more precise in terms of assessing the overall bauxite resource. Two kinds of vehicle-mounted drills will be used to take samples (Figure 3-4 shows one of these drills). The drilling locations are small and generally square to rectangular in shape with a short access track leading from the nearest main access 'road' to the drilling location (see Figure 3-5). Land and non-perennial crop/vegetation disturbance is temporary (often less than 6 months).



**Figure 3-4: Drilling rig**



**Figure 3-5: Typical layout of drilling location (showing access track and part of drilling rig to the left)**

## 4. SIGNIFICANCE ASSESSMENT

### 4.1 Review findings

A summary of the review findings is presented in a significance table at the end of each PS Section. In the tables each finding is presented as an issue, and the following information is provided (see Table 4-1 below):

- The topic/aspect;
- A description of the issue, for example deficiencies or omissions;
- The phase(s) to which an issue relates;
- Recommendation, where applicable, to resolve/manage the deficiency; and
- The significance on a three-point scale (see below for criteria for assigning significance).

### 4.2 Assessment of significance

A ranking system has been used to indicate the relative significance of each issue identified. As well as highlighting the most important areas requiring improvement, it can also be used to aid the tracking and rectification of improvement measures.

Identified issues have been placed into one of the following three categories:

**Minor:** Minor non-compliance, risk or minor technical breach of Applicable Standards and commitments with no material, actual or likely potential environmental or social consequences; or significant human injury or harm;

**Moderate:** Moderate non-compliance or risk with actual or likely potential localised and short-term environmental or social consequences; minor human injury or harm; or material short-term breach of Applicable Standards and commitments; and

**High:** Major non-compliance or risk with actual or likely potential spatially extensive and/or long-term environmental or social consequences; serious human injury/death or harm; or material and extensive breach of Applicable Standards and commitments.

**Not Applicable** Issue is noteworthy, but not a matter of non-compliance.

Where time-critical recommendations are made a timeframe linked to Construction/Operational phase milestones is indicated in the 'IESC recommendations' column. Time-critical issues measures can lead to a higher classification of significance.

**Table 4-1: Example of the summary table format**

ID	Aspect	Issue Description	Phase <sup>7</sup>	IESC Recommendations	Significance
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities.  To date the Company has been unable to procure monitoring equipment – no monitoring has been undertaken.	Ops	<i>Company X shall Expedite procurement of monitoring equipment with the support of senior management.</i>	<b>Moderate</b>

<sup>7</sup> Phases can include construction; operations; decommissioning; or any combination of these phases.

## 5. PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

### 5.1 HSECQ Resources

This section provides an update on HSECQ resources, including a discussion around senior HSECQ positions and the CR team. Commentary on resettlement-related resources is included in Section 9.5.

#### 5.1.1 Senior HSECQ positions

The IESC's previous monitoring report (July 2020) provided information on the structure of the HSECQ Department and included an organigramme. The structure remains unchanged and is therefore not repeated in this report.

The previous monitoring report referred to several senior hires and concluded that the HSECQ Department had a near full complement of senior HSECQ positions. The one notable exception was the vacant position for the Environmental and Monitoring Team Leader (EMTL), previously incorrectly referred to as the Environment Manager. At the time of the previous VSV, CBG (and the IESC) highlighted recruitment for this post as a priority, and in December 2020 the post was filled.

The EMTL leads a team that is responsible the implementation of several key management plans relating to the management and monitoring of air; water; noise and vibration; wastes, hazardous materials, resource and energy efficiency as well as contributing to implementation of other management plans. Whereas others within the HSECQ team have been covering these roles for approximately one year following the resignation of the previous EMTL, the recruitment of a dedicated resource for this role is considered to be crucial by the IESC and therefore an important positive step.

At the time the March 2021 VSV, the IESC acknowledges that HSECQ team does not have any key vacant posts. However, as previously reported, there has been a relatively high turnover of senior HSECQ staff which has been detrimental to CBG's management of HSECQ matters<sup>8</sup>. *Post-VSV Note: the HSECQ Director in place at the time of the VSV left CBG shortly after the VSV. In the interim CBG has an HSECQ Acting Director in place.* The IESC therefore reiterates the importance of CBG reviewing its recruitment process, including the role of the parties responsible for recruitment and succession planning, drawing on experience of other similar projects where appropriate, to avoid or minimise time periods in which key HSECQ positions remain vacant. The upcoming finalisation of a medium-term Recruitment Plan<sup>9</sup> and an associated 'needs analysis' provides a mechanism to identify upcoming recruitment needs, including any succession planning in the event of fixed duration employment contracts, taking into account typical time periods needed/procurement challenges in recruiting senior HSECQ positions.

Of note, CBG has also recruited 4 further staff members in the HSECQ Department. This includes 2 individuals in the Community Relations team (see Section 5.1.2, Community Relations) and 2 in the Resettlement Team. These hires were referred to as 'urgent hires' because they were needed to fill an immediate resourcing gap.

Also, as indicated in Section 9 Land Acquisition and Involuntary Resettlement, the contract of the expatriate Resettlement Manager is due to expire in September 2021. Given the scale of 'resettlement' work to be done for the remainder of 2021 and into 2022, there will be adverse

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<sup>8</sup> The IESC believes the fixed term nature of expatriate contracts is likely to contribute, in part, to the turnover of senior staff.

<sup>9</sup> ESAP item 7 requires the preparation of a Time Bound Recruitment plan (version 2) be developed by end June 2021.

consequences for resettlement planning and implementation if management continuity is not maintained. CBG should ensure the momentum of livelihood restoration work is not affected and the Resettlement Manager post does not become vacant.

Given the concern about continuity for all senior HSECQ positions, the IESC recommends early discussion between CBG and individuals on fixed term contracts to remove any uncertainty in the run up to employment contract end dates, thereby ensuring the continuity of skills is maintained without a gap.

### 5.1.2 Community Relations team

The CR team remains effective under the leadership of the CR Manager. The CR Manager has been in post since the first IESC monitoring site visit (November 2016) and this stability in leadership has been a very valuable asset to the team and its work. The Manager has been able to guide the gradual, but steady expansion of the team in a way that is consistent with key emerging needs.

#### *Staff Resourcing*

At the end of January 2021, the CR team's staff complement increased from seven to nine by the addition of two new hires, as follows:

- 2 Community Relations Co-ordinators (Sangarédi office base and reporting to the CR Superintendent).
- 1 Community Relations Co-ordinator based in Sangarédi was also promoted to the role of Community Development Co-ordinator.

There are five team members based in Kamsar (including the CR Manager and the CR Superintendent plus a Community Development Co-ordinator and two Community Relations Co-ordinators) and four members based in Sangarédi (four Community Relations Co-ordinators).

The CR Manager informed the IESC that, for the previous six months, the CR team in Sangarédi had been supported, on a full-time basis, by a staff member from the Mining Operations section. This staff member has focused mostly on blasting and community sensitization/consultations, but also provides support for other CR team activities.

In 2020, the CR team devoted a considerable portion of its stakeholder engagement efforts (41% of all stakeholder meetings) to resettlement issues (the Hamdallaye/Fassaly Foutabhé RAP and the Thiapikouré LRP) and to the MUOA Project (specifically community/local authority meetings related to the installation of rail crossings under the MUOA Transitional Measures Plan). This commitment meant that only 59% of all stakeholder meetings were focused on the themes/topics presented in the Stakeholder Engagement Plan (SEP), which reflect CBG's 'day-to-day' operational activities/issues. This situation is expected to continue, at least for resettlement-related activities, as the extent and number of resettlement-related activities is expected to increase over the next few years. However, the commitment to the MUOA project is expected to decline. A relatively recent additional task is the work related to supporting the CAO dispute resolution process following the acceptance of a complaint (submitted by two NGOs on behalf of 13 villages) by the CAO<sup>10</sup>.

In addition to the foreseeable increasing workload indicated above, the workload pressures on the CR team will further increase by Q3/Q4 2021, as CBG is planning to resume exploration campaign in the north of the Cogon concession area. The location selected for exploration is a considerable distance from Sangarédi (IESC understands that the nearest plateau is up to 30 to

<sup>10</sup> IFC's Compliance Advisor Ombudsman is undertaking, currently, a dispute resolution process following acceptance of a complaint from 13 villages, all in the mining area. The complaint centres, primarily, on the adverse cumulative effects of mining and mining-related land disturbance on community livelihoods and potential breaches of IFC standards.

40 km distant by road) and exploration activities are expected to cover three plateaux (the number of affected villages is not yet known but may be at least seven). This campaign will require allocation of CR team resources at some considerable distance from its main areas of operations. Alternatively, CBG might decide to require its exploration contractor/s to undertake all the required stakeholder engagement under its oversight. Although this might reduce the workload on the CR team, such oversight, at a distance, is nevertheless time-consuming. Also, overall, the saving in staff resources resulting from this option may be minimal.

Currently, the CR team is preparing a revised version of the SEP for the management of all stakeholder engagement during the period 2022 to 2025. The current SEP places significant responsibility on the CR team in terms of CBG's 'day-to-day' operations with limited recognition of the fact that there will be specific, focused time-bound activities that will require the CR team's attention, thus diverting resources away from its role in assisting with CBG's 'day-to-day' operations. It is recommended that the CR team carefully considers both i) lessons learnt from implementing the current SEP and ii) its likely future commitments, when revising the SEP, and ensures that the revised SEP presents a realistic, pragmatic and flexible set of requirements that are implementable in the specified time period while being compliant with PS 1.

Also, the CR team has an opportunity to identify additional recruitment needs within the context of preparing Version 2 of the Time-bound Recruitment Plan which is scheduled to be completed by mid-July 2021. It is intended that the current 'Mining Operations' staff member is included as a 'hire' in Version 2 of this Plan. This intended hire would raise the complement of the Sangarédi-based CR team to five members with the possibility of additional hires depending on the hiring recommendations in Version 2 of the Time-bound Recruitment Plan. Of note, the resettlement team intends to appoint a database specialist to assist with data management primarily for resettlement; however, this is a resource which may have the potential to support the CR team as/when a need arises. Recruitment of this database specialist post has not yet started.

Overall, there are several expected future work commitments that will put pressure on the existing CR team resources, potentially leaving the CR team with insufficient resources to meet these commitments effectively. The IESC recommends that the CR Manager evaluates, carefully, not only the CR team's current and future workload, but also the geographic locations where it is likely be working, when identifying its future likely recruitment needs.

#### *Equipment resourcing and training*

In its July 2020 monitoring report, the IESC recommended that CBG prepare and implement a Time-bound Capacity Development and Resource Acquisition Plan, for both CR and resettlement teams, for the period up to 2024. This Plan became an ESAP requirement with the Plan covering two time periods: first the period up to end June 2021 and secondly, the period from mid-2021 to end 2024. In relation to the first time-period, the plan envisaged either purchase or allocation of specific equipment and resources (such as installation of social data management software) to the teams.

CBG selected the software platform 'IsoMetrix' for both social and biodiversity data management. The software was installed and then launched on 29 January 2021 (licensed for fourteen users and two administrators - currently there are twelve users) and training to CR staff given plus a member of the resettlement team. Also, a 'helpdesk' service is provided by IsoMetrix. There are two phases to the installation: Phase 1 is almost completed, and Phase 2 begins in April 2021 (for example, in this Phase the dashboard function will be developed).

Prior to the VSV start date, CR team members using IsoMetrix experienced delays in certain functions particularly in terms of uploading/downloading files. IsoMetrix then installed an upgrade which was tested on the 8 March 2021. On 9 March 2021, during the VSV, the CR team demonstrated, to the IESC, how IsoMetrix could be used to record and analyse stakeholder-



related data. The IESC was informed that the 8 March test indicated improvement, but not sufficient for CBG to be content with overall performance. Performance testing will continue during the period March-April 2021. If, by the end April 2021, performance is not considered satisfactory, it is possible that CBG may need to install a separate dedicated server located in Guinea. The CR Manager consider that this 'worst case' scenario will delay achieving an acceptable level of performance until end August 2021.

The Capacity Development and Resource Acquisition Plan for the first time period (signed at the end of November 2020), also includes an action to purchase of a range of hand-held devices to assist recording data in the files, by end May 2021. The CR Manager reported that procurement of these devices was on track. The Plan also envisages the allocation of a 4x4 vehicle by the end January 2021 to CR team members based in Sangarédi. This vehicle would be sourced from CBG's vehicle fleet, subject to maintenance and safety checks showing that it can be used safely. As of the date of the VSV, this vehicle had not been allocated. The CR Manager considers that provision of this extra vehicle is sufficient for the Sangarédi CR team members even after the complement is increased. However, the new recruit based in Sangarédi has begun work and the vehicle has not been allocated. As the existing vehicles capacity is four people, this means that one staff member cannot undertake fieldwork or community consultations and instead must remain in the office unless access to a non-CR vehicle can be negotiated on an *ad hoc* basis – this is not a satisfactory approach as it makes workload planning very difficult. This situation would be exacerbated if/when the recruitment of the current Mining Operations staff member joins the CR team.

The IESC finds this delay concerning and recommends that the vehicle is allocated without any further delay or a replacement vehicle is hired if the maintenance and safety checks find that repairs to the fleet vehicle are required. If no fleet vehicle can be allocated by end April 2021, then it is recommended CBG purchase a vehicle of equivalent passenger capacity and performance for the sole use of the CR team.

Finally, the training component of the Plan has begun in Q1 2021. For example, grievance management training is being provided by IFC Advisory Services and is due to be completed by the end of March 2021.

## 5.2 Management Systems

The IESC confirms that the following ISO certificates listed below remain valid until Q1, 2023.

- ISO 14001 (Environmental Management);
- ISO 9001 (Quality Assurance); and
- ISO 45001 (Occupational Health and Safety).

### 5.2.1 Audit programme

CBG continues to implement an internal audit programme that is tailored towards high risk activities/locations where practices have been identified for improvement. Thus, in 2020 (and ongoing in 2021), the focus has been on rotating equipment, conveyors, the use of Personal Protective Equipment and the use/condition of protective equipment (safety guards etc.). The latter focus area was prompted by an incident where a safety guard had been removed from rotating equipment. Audits and inspections are conducted on varying timescales, for example, rapid inspections of contractors are carried out on a weekly basis whereas more comprehensive audits are quarterly.

In addition to the external audits conducted by Ramboll, CBG is periodically audited by other external organisations, including BGEER and commercial auditors responsible for ISO re-certification audits. External audit findings are captured in a single audit tracker made available

to the IESC during the March 2021 VSV which includes responsible parties, status of findings and any corrective actions taken to close findings.

CBG's approach to audit and inspection has been reported on in previous IESC monitoring reports and has not changed substantially in 2020/2021. The IESC does however note the difficulties external organisations, including Ramboll (the IESC) and BGEEE<sup>11</sup> have had participating in actual on-site inspections because of COVID-19 travel and safety restrictions. On site audits should recommence at the earliest opportunity once safety and travel restrictions permit.

### **5.3 Plateau-by-Plateau Approach/Land Disturbance Permits**

#### **5.3.1 Update**

CBG continues to apply the plateau-by-plateau (PbP) approach and prohibits mining/other works until a Land Disturbance Permit (LDP), detailing environmental and social conditions and constraints, is approved and issued. The LDP process has been described in detail in previous reports and remains largely unchanged with the exception that an LDP cannot be issued until compensation has been paid and an LRP prepared. Previously, LDPs could be issued following compensation payment, but prior to the development of an LRP. The IESC has previously commented that the LDP process provides an important and effective mechanism for the avoidance or environmental and social harm. This recent change puts in further controls to ensure livelihoods are better protected and is therefore a welcome development.

During the VSV, Ramboll was provided with a live demonstration of CBG's GIS capabilities in relation to PbP sensitivity mapping. The IESC confirms that CBG has strong in-house GIS capabilities which are effectively used to accurately map and communicate environmental and social constraints per plateau.

In 2021 to date, two requests to disturb land (and, therefore, for LDPs) have been made by the mining department; one involves a minor amendment to an existing LDP for M'bouroré and the second relates to CBG's 2021 exploration campaign covering three plateaux in the NoCo concession area.

#### **5.3.2 NoCo Exploration campaign**

Since 2016, CBG has undertaken limited exploration and related activities in the NoCo concession. These activities occurred outside the scope of the CBG ESMS which was being put into place for Phase 1 of the Expansion Project and then extended to include the MUOA Project over the period 2016 to date, and is progressively being expanded to ensure all CBG's activities are to a level consistent with the intent of the IFC Performance Standards by 2024 (as per Item 1 of the ESAP). At present, for example, the draft Biodiversity Action Plan does not include the NoCo area. However, CBG did implement its then current procedures which did take social, biodiversity and environmental considerations into account; with the attention paid to biodiversity and environmental issues being more limited than in the case of social issues. For example, existing tracks were used as much as possible and areas of woody vegetation and all trees with a bole diameter of 10 cm or more were avoided. At the time of the VSV all exploration activities had ceased.

The Geological Department implemented its procedure, with E&S elements, for managing actions to obtain exploration data on the scale of the bauxite resource. This procedure is not yet aligned with the CBG ESMS and work is underway to update/revise it to ensure alignment. The revised /updated Geological Department procedure will replace the PbP approach for exploration campaigns as the PbP approach is considered by CBG to be more suited to exploitation (actual mining) activities. However, the LDP process will apply to each annual drilling campaign which,

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<sup>11</sup> The Guinea environmental regulator, Bureau Guinéen d'Études et d'Évaluation Environnementale



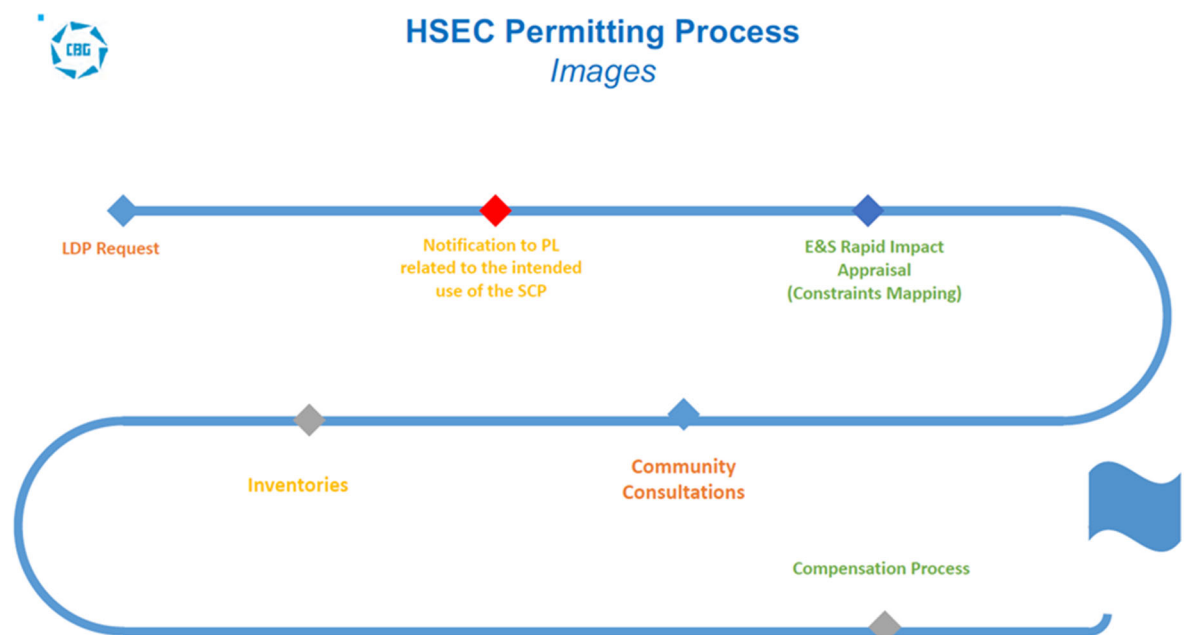
for the intended 3-year campaign, will mean that three permits are likely to be prepared/approved: one for each drilling campaign.

Given that E&S management procedures for exploration are not currently aligned to CBG's ESMS, and that exploration is best undertaken in the dry season, CBG is considering postponing the start of the exploration campaign until March to June 2022. The postponement schedule is considered prudent as it will allow for all E&S studies to be completed in accordance with CBG's ESMS. In April 2021, a biodiversity screening study will be undertaken – this is a preliminary study to delineate the main biodiversity features of the three plateaux, to be followed by more detailed study/analysis. *Post-VSV Note: CBG has provided a verbal confirmation of a delay in beginning the exploration campaign. Also, CBG has indicated that its current plans are to undertake all necessary studies from July 2021 with a view to beginning exploration activities in December 2021.*

As mentioned above, the LDP process will apply to the NoCo exploration drilling campaigns and it will follow the sequence of activities shown in Figure 5-1 below. The second stage in the process is a notification to Policy Lenders that the Streamlined Compensation Process will apply to the economic displacement that will affect those whose land, crops or other assets are damaged by the exploration activities (no physical displacement is expected to occur). The Streamlined Compensation Process is the applicable procedure, included in the Resettlement Policy Framework, to be used for temporary economic displacement resulting from exploration drilling activities. No such notification has been issued by CBG at the time of reporting.

It is noted from the LDP process that community consultations occur after the E&S Rapid Appraisal stage. Good international practice is to begin community consultations as early as possible and the LDP process, as presented in the draft Compensation and Resettlement Policy Framework, shows that community consultations occur prior to impact mitigation measures being defined. It is, therefore, recommended that one round of community consultations occur as part of the E&S Rapid Appraisal stage, at a time which CBG considers most appropriate in the local context.

Following the E&S Rapid Appraisal stage, asset inventories will be implemented and the payment of compensation for affected assets will be paid. For its previous NoCo activities, CBG has paid compensation after economic displacement has occurred. The implications of this approach in terms of compliance with PS5 are discussed in Section 9.8.



**Figure 5-1: NoCo exploration campaign: LDP process**

In addition to land disturbance and economic displacement, an exploration campaign of three-years' duration over a relatively large 'greenfield' area has the potential to result in biodiversity impacts. Currently, the biodiversity risks are unknown as no E&S studies have been implemented to date. This situation, coupled with a current lack of knowledge of the scale of 'economic displacement', points toward the potential benefits that could accrue from a more strategic approach to managing the E&S implications of the 2021-2024 exploration campaign.

The proposed 2021-2024 exploration campaign affects a relatively large area and application of a PbP approach with each plateau being subject to its own LDP process means that the cumulative impact of exploration in all three plateaux over a three-year period is not factor in drilling campaign decision-making at the annual LDP level. It is recommended that CBG undertake a rapid cumulative E&S assessment of the entire campaign, as if it were a single project, prior to the first E&S rapid impact appraisal. This cumulative assessment would focus on identifying and evaluating the key risks of the entire exploration campaign and then determining the type of mitigation measures (at a high level) to be taken to avoid/minimize these risks. The results would then inform the individual E&S rapid impact appraisals, where the 'high-level' mitigation measures would be adapted to make them specific to a single drilling site or a set of sites within the context of each of the drilling campaigns.

## 5.4 Environmental and social management plans

### 5.4.1 Background

The ESAP includes a requirement to, "Update the Environmental and Social Management Plan (ESMP) to include the existing CBG operations, the Phase 1 Expansion and any future expansions". By January 2019, the full suite of E&S management plans had been updated to apply to all CBG operations (rather than be specific to the Expansion Project) and were considered complete and 'signed off' by the IESC.<sup>12</sup>

<sup>12</sup> All plans were updated, however further studies were required to finalise the Air Quality Management Plan.

A key component for most of the management plans is the inclusion of an action plan, detailing firm commitments to undertake future actions with timeframes and responsible parties identified for each action.

In its July 2020 monitoring report, the IESC noted that CBG would need to review and potentially update the management plans to incorporate mitigation measures/actions specified in the MUOA ESIA Report (2017) and any supplements to the MUOA ESIA Report. It was noted, further, that this MUOA-induced review provided an opportunity for CBG to make other/multiple changes in a single revision thereby limiting the number of potential Management of Change (MoC) notifications necessary (amendments to any management plan requires Lender acceptance of the proposed changes via the MoC Procedure).

#### 5.4.2 Management Plans: progress review of Action Plan implementation

##### *Environmental Management Plans*

In its July 2020 monitoring report, the IESC reviewed the implementation status of key environmental management plans. The IESC recognised good progress in many areas, but that overall progress was well behind the schedules outlined in the Action Plans. The IESC attributed delays to the vacant EMTL post at the time, COVID-19 restrictions and overly ambitious timeframes specified in the original management plans.

During the current VSV, the implementation review focused on 8 plans that were originally finalised and signed-off by the IESC in January 2019, as listed below:

1. Air Quality Management Plan;
2. Environmental Monitoring Programme;
3. Hazardous Materials Management Plan;
4. Noise and Vibration Management Plan;
5. Resource Use and Energy Efficiency Management Plan;
6. Waste Management Plan;
7. Water Management Plan; and
8. Dredge Management Plan.

The table below provides an overview of progress made for certain plans where data was made available by CBG. It should be noted that some of the plans have been revised in accordance with the ESAP which requires revision of management plans in light of new or amended requirements resulting from the MUOA project (see Table 5-1: Findings from review of certain Environmental Plans (Q1, 2021)). Thus, the total number of actions has increased for some plans because of new actions associated with the MUOA Project.

**Table 5-1: Findings from review of certain Environmental Plans (Q1, 2021)**

Management Plan (Action Plans)	Total #actions	#Not started		#In progress		#Completed	
		July 2020	March 2021	July 2020	March 2021	July 2020	March 2021
Waste management	156	52	44	19	22	85	90
*Water management	87 (2020) 93 (2021)	50	44	17	23	20	26
*Noise & Vibration	34 (2020) 46 (2021)	9	4	23	35	2	7
HMMP	45	18	17	19	11	8	17
AQMP	Consolidation of actions prevents comparison to July 2020; however, all actions had commenced as of March 2021. In July 2020, at least 6 actions had not started.						

\* Management plan was updated to take account of changes necessary for the MUOA project resulting in additional actions in 2021.

The table shows progress has been made across all plans since the previous VSV in July 2021, although progress is typically behind the original schedule for all environmental management plans. The IESC understands several factors have contributed to the delays as highlighted above and anticipates the speed of implementation to increase following the appointment of the EMTL in late 2020. The IESC also acknowledges that many of the EMPs have been revised in light of the MUOA project, however, certain plans that were not affected by the MUOA project remain unchanged since they were approved in January 2019. It is therefore recommended that all plans, rather than just those subject to an 'MUOA' update, are reviewed and updated in line with the 2-year review cycle typically described in Section 10 of the EMPs. Reviews should include both an update of the content of the plan to reflect current status and thinking, and also revision of the timeframes included in the associated actions plans. Specific areas within specific plans for update are highlighted in Chapter 6. A similar recommendation is made for the Social Management Plans in the Section below.

#### *Social Management Plans*

Information is provided on plan implementation for the year 2020 only. The implementation of the following Plans, in 2020, was reviewed:

- Local Content Plan;
- Cultural Heritage Management Plan;
- Influx Management Plan;
- Community Health and Safety Management Plan; and
- Community Development Plan.

Implementation of all these plans is the responsibility of the CR team. All these plans were amended to take account of the MUOA Project and in some cases, non-MUOA prompted changes were made based upon experience of implementation at the time of making the MUOA-related amendments. Implementation of the Contractor Management Plan (includes both environmental and social requirements) was also reviewed – see Section 5.9.

In total, for these five plans, 58 actions were current in 2020 (not all started in 2020). Only a few were due to be completed in 2020 or by the end of Q1 2021. Most were continuous or ongoing actions. Seven actions were completed and two were not completed; however, both non-

completed actions are expected to be completed, albeit a later than intended. These two actions are:

- *“Establish a Local Content Steering Committee to coordinate recommendations and action plan from the IFC workshop, and internal communication on the LCP”* [Source: Local Content Plan]. This is a little late as it is scheduled to be completed by end of Q1 2021. Focal points have been identified within CBG and the Steering Committee is expected to be set up in mid-April 2021; and
- *“Include CH [cultural heritage] management clause in relevant contractor and third-party workforce contracts (mine)* [Source: Cultural Heritage Management Plan]. The HSECQ department is preparing the HESCQ ‘minimum requirements’ to be included into Requests for Proposals (RfPs) and contracts for contractors. The current draft of the ‘minimum requirements’ includes the required cultural heritage management clause. The HESCQ ‘minimum requirements’ are undergoing validation checks and are expected to be finalized soon.

Table 5-2 presents summary of the status of the 58 actions current in 2020. Overall, the following observations are made. Implementing all actions is still proving to be challenging for the CR team. To assist implementation and co-ordination of implementation across the Plans, the CR team has allocated responsibility for implementation of a plan to a team member. This is a welcome measure whose effectiveness will be investigated in future site visits.

All Plans require an annual report to be prepared – to be issued in Q1 of the following year. None were issued in Q1 2020 for 2019. However, the annual reports for 2020 will be issued in mid-April 2021. In 2020, unlike 2019, more effort has been applied to obtaining and analysing data to enable the KPIs to be tracked. This work is essential for preparing the annual reports of plan performance. Specific difficulties have been encountered in obtain population data for the KPIs of the Influx Management Plan and in the context of implementing the Local Content and Community Development Plans.

The process of amending plans to take account of the MUOA Project is nearing its end. Some additional MUOA-related actions have been added to certain plans. As mentioned briefly earlier, for some Plans this process has been expanded to include a wider review of the Plans with a focus on the applicability and relevance of some of the actions and, for a few of the plans, some actions have been deleted. Thus, for some plans there are now fewer action than was the case when these plans were reviewed during the July 2020 site visit.

Apart from the Local Content Plan, the social management plans will undergo a review after 2 years (for the Local Content Plan, the review will occur “...as necessary”). As these Plans were approved in early 2019, it is recommended that they are reviewed and updated in line with the 2-year review cycle, as described in Section 9 of the Plans. Given the challenges that have emerged in implementing some of the actions; these reviews provide an opportune moment for a comprehensive evaluation of the continuing relevance of all actions, especially, those actions that are continuous or on-going. It is recommended that CBG (CR team) undertakes such evaluations and then amend the actions and timescales, as necessary, considering both the results to date from implementing the existing actions and, also, emerging issues that necessitate adding new actions. The amended Plans/Action Plans must identify priority time-critical actions.

**Table 5-2: Findings from review of the five Social Plans - actions for year 2020**

Management Plan/Action Plans	#Actions	#Ongoing	#Continuing	#Not completed	# Completed	(%) Completed
Community Health and Safety	17	3	14	NA* (as not started)	NA	NA
Local Content	8	3	4	1	0	0
Cultural Heritage	16	0	11	1	4	25
Community Development	11	2	6		3	25
Influx	5	1	4	NA	NA	NA

\*NA- Not Applicable (actions that are either continuous (no end point) or ongoing at the end of the IESC's reporting period).

## 5.5 Stakeholder engagement

The following topics were identified for discussion with CBG during the VSV:

- Scope and focus of stakeholder engagement;
- Female participation in consultation meetings;
- External communications and community grievances;
- Community requests for assistance (*doléances*); and
- Registers: Community grievances and requests for assistance (*doléances*).

### 5.5.1 Scope and focus of stakeholder engagement

During Q4 2020 and Q1 2021, CBG has extended the 2019-2020 Stakeholder Engagement Action Plan so that it now covers the period up to the end 2021. At the same time, the SEP is being amended to take account of the MUOA Project with a completion date scheduled for the end April 2021. Both documents will be disclosed publicly.

After this task is completed, CBG will move to reviewing and updating the SEP for the period 2022 to 2025. This will be the first review and update of the SEP since it was first issued in 2016 and, therefore, is a major task. CBG will commission a third-party specialist to undertake the review and update. The revised/updated SEP (2022 to 2025) is expected to be completed by end August 2021 in accordance with the approved version of the ESAP dated December 2020. Again, the revised/updated SEP will be disclosed publicly.

In H2 2020 and continuing into Q1 2021, the extent of stakeholder engagement activities, especially with communities, was limited by COVID-19 restrictions. For 2020, there were 230 stakeholder meetings compared to 347 meetings in 2019 (2019 AMR). In H2 2020, CBG was able to increase the number of meetings compared to H1 2020. At the end of H1 2020, 83 stakeholder engagement meetings occurred with 38 of them being with communities. In H2 2020, 147 meetings were held giving the total for the year of 230 meetings with almost half of them (110) being with communities – mostly in the mine and rail zones (see Figure 5-2 below). The community-focused meetings occurred in 98 villages, as follows: mine - 51 villages; rail - 34 villages; and port - 13 villages.

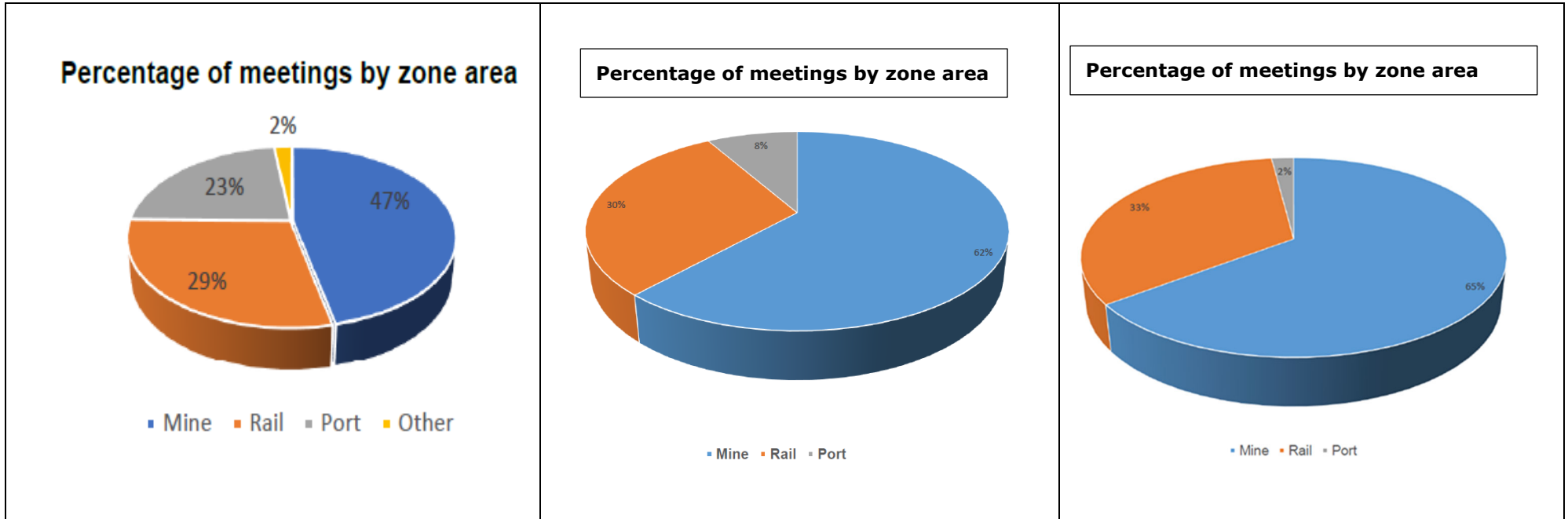
Since the beginning of 2019, there has been a trend of most meetings focusing on the mine and rail zones. Within these two zones, in 2020, 40% of all stakeholder meetings focused on resettlement issues; particularly, the Hamdallaye and Fassaly Foutabhé RAP, the Thiapikouré and Kankalaré LRPs, and the MUOA Project (proposed programme focusing on rail crossings). At the end of Q1 2021, this figure has reduced to 26%; mostly due to the MUOA consultation

programme, focusing on location and types of crossings, coming to an end (consultations will begin again prior to the installation of the crossings toward the end of H1 2022).

Figure 5-2 compares an analysis of all stakeholder engagement meetings by zone (mine, port, rail and 'other': 'other' generally refers to internal CBG stakeholders) over the period 2019 to 2021 to date. It is necessary to be careful in drawing conclusion as a) the 'context' for stakeholder engagement during each of the two years are not similar and b) the 'other' category is not shown for 2020 and 2021 to date (end Q1). However, the data do indicate some key differences in the focus of stakeholder engagement between the two years:

- More meetings occurred in the mine area in 2020 than in 2019 (62% compared to 47%);
- Significantly fewer meetings occurred in the port area in 2020 (8% compared to 23%); and
- The proportion of meetings related to 'rail' (includes MUOA-specific consultations) is almost identical for both years (30% compared to 29%).

The change in focus of stakeholder engagement activities seen in 2020 has continued into 2021 (end Q1). Figure Figure 5-2 shows the 'bias' toward the activities in the mine and rail zones and away from the port is continuing; for example, between 2019 and 2020 the number of meetings in the port reduced from 23% to 8%; whereas at the end of Q1 2021 the reduction was from 8% to 2%.



**Figure 5-2: Percentage of stakeholder meetings (%) by zone area: 2019 (on left); 2020 (in middle), and 2021 to date (on right)**



In 2019 and 2020, CBG intended to engage with coastal and island communities near Kamsar. From meetings with fishermen (Port Néné and Port Fory), CBG learnt that the island communities were not permanent and that groups inhabit them seasonally; for salt production (in March - April) and for fishing (in December - May). In 2020 and into Q1 2021, COVID-19 restrictions prevented a mission to find and consult the island communities. CBG still intends to consult them in 2021.

Implementing the stakeholder engagement action plan until end 2021 has the following focus, by zone:

- Port: Meetings with the island villages of Kamsar once they have been identified and contacted;
- Rail: Meetings on rail safety, implementation of transitional actions related to railway community safety, and implementation of the MUOA LRP; and
- Mine: Meetings with high and medium impact villages (stripping and exploration) and will deal with the implementation process of the Kankalaré and Thiapikouré LRPs.

Finally, in 2020, CBG identified several recurring themes raised in its community engagement meetings in the different zones, as follows:

- Mine:
  - Demands for basic social infrastructure; and
  - Employment of local labour; and
- Railway:
  - Access to water (boreholes);
  - Railway crossing issues (safe crossing facilities: level crossings and pedestrian footbridges); and
  - Community access roads; and
- Port:
  - Basic social infrastructure (school, road, sanitation, water supply).

#### 5.5.2 Female participation in stakeholder engagement meetings

In the July 2020 IESC monitoring report, it is noted that CBG was analysing the male/female ratio in terms of participation in stakeholder engagement events, especially community-level meetings. CBG found that, for most of 2019 and all H1 2020, 30% of the participants in engagement events were female. Over the entire year, 2020, CBG found that, for the mine zone, 32% were female and for the port/rail area, females constituted 46% of all participants. This latter figure is attributed to the high number of female school children attending rail safety sensitization events.

For Q1 2021, CBG reports that the female participation rate in community-level meetings in the mine zone had declined to 21% while remaining at 47% in the port/rail zones. Currently, CBG is identifying and evaluating actions and approaches that will assist increase female participation in consultation meetings, such as:

- Wider variety of meeting types for example, all female workshops led by a CBG female employee;
- Locations and timing of meetings to be determined after careful consideration of the main female activities/location (for example, petty trading in urban areas to gardening and agricultural work in the rural areas); and
- Amending templates for recording meetings (*Minutes/Procès Verbal*) to enable accurate recording of female participants.

This CBG-focused initiative aimed at increasing female participation in stakeholder meetings is welcome and complements previous IESC recommendations for a more inclusive approach to resettlement-related consultations. However, it does not include contractors. Thus, it is recommended that, once CBG decides on its approach to encouraging more female participation, CBG requires its contractors to follow its lead; particularly contractors that are involved in preparing and/or implementing RAPs and LRPs.

Regarding submission of grievances, CBG has found that grievances are always submitted by men even if the 'driver' for submitting a grievance is a woman or a group of women. Communities are sensitized regularly with respect to the operation of the Grievance Mechanism. As part of its efforts to increase female participation in stakeholder engagement, it is recommended that CBG considers ways in which women can be encouraged to submit grievances directly and not only via male relatives/community members.

### 5.5.3 External communications and community grievance mechanism

#### *External communications*

In the July 2020 Monitoring Report, reference is made to a new communications specialist joining CBG, to be based in Kamsar. The Communications Specialist has since joined. During the March 2021 site visit, the IESC was informed that, in late November 2020, a Communications Plan was prepared for the year 2021. A copy of the plan was provided to the IESC soon after the end of the site visit. The IESC's examination of the Plan reveals that the Plan is not in the same format as those Plans that constitute the suite of E&S Management Plans; for example, it is based upon an Excel spreadsheet, is highly schematic, with virtually no text. Consequently, it lacks such information such as context for the Plan and its specific requirements/ actions, allocation of responsibilities to key personnel, and a monitoring and evaluation (M&E) framework based upon KPIs. Also, of note, it has no QA/QC/document control information, so it is not possible to know the status of the document when seen. [*Post-VSV Note: CBG has informed that IESC that this Plan was approved on 8 March 2021 by the Director-General and, therefore, the Plan is active. Also, CBG intends to review and re-issue the plan annually.*]

In brief, the Plan's scope covers both internal and external communications with three themes/pillars:

- Internal:
  - Strengthening corporate loyalty and commitment among employees (*'sentiment d'appartenance'*); and
  - Promoting operational excellence (*Excellence Operationelle*); and
- External:
  - Protecting the social licence to operate and enhancing CBG's reputation (*Licence Sociale d'Operation & Grande Reputation*).

Each of these three themes/pillars encompasses several topics (secteurs) with a series of associated actions/events to be implemented at specific times in 2021.

The IESC notes that the planned actions for Operational Excellence include explaining to employees (*vulgarisation*) the Labour Code (*le Code de Travail*) and the *Règlement Intérieur* (similar to an Employee Handbook and a precursor to the current HR Manual), but not the HR Manual and the Workers' Grievance Mechanism which are new important documents for labour and working conditions. The Code of Ethics and Business Conduct, also, will be explained to employees; however, it is not clear if this is the old version or the current version of the Code. It is recommended that the actions, presented under 'Internal - Operational Excellence' and concerning HR documents, are amended to show the current new key documents and not only older, though still current documents.

Preparation, implementation, and maintenance of a procedure for external communications is a requirement of PS 1 (paragraph 34), as follows,

*“Clients will implement and maintain a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate.”*

Currently, the CBG Communication Plan does not include any of the above elements as presented above. A short procedure could be added to the Communications Plan or a procedure could be prepared and disseminated publicly. Such an action will need careful consideration to avoid potential local stakeholder confusion (communities, NGOs and local government entities) between the community Grievance Mechanism, which has been in place for several years, and the scope of any new procedure for external communications. In addition, there needs to be close collaboration between the CR Manager and the Communications Specialist to ensure that the procedure for external communications is consistent with the revised SEP (for the period 2021 – 2025) to avoid duplication and/or gaps in scope. The IESC recommends that CBG designs a procedure for external communications, and then inserts it into the Plan ready for implementation in 2022.

#### *Community Grievances (2020 and Q1 2021)*

As of 31 December 2020, CBG received 38 grievances (9 more than for 2019). All originated from the mine and rail zones (89% and 11% respectively); this is a significant change from 2019 when the proportions were approximately equal. The change can be explained, probably, by the following two factors;

- Increase in grievances arising from implementation of the Hamdallaye/Fassaly Foutabhé RAP, particularly the Hamdallaye village relocation in early 2020; and
- Fewer MUOA-related grievances due to the reducing level of construction activity associated with the MUOA Project as the year progressed.

Grievances relating to Hamdallaye/Fassaly Foutabhé RAP implementation were 42% of all grievances received. The remaining 58% arose from mining operations (32%), construction and/or maintenance work (8%), and others such as fire and floods due to runoff water (18%). In terms of grievance topic: 74 % of grievances were linked to economic matters, 10% to safety, and 16% to the environment. This breakdown is relatively similar to the 2019 equivalent figures in terms of economic matters being by far the dominant grievance topic.

CBG sub-divides grievances into three categories: ‘economic’, ‘safety’ and ‘environment’. These are broad categories; especially ‘economic’. As they are so broad in their coverage and can include a range of individual topics; these three categories are not very helpful when trying to analyse emerging trends in types of grievances being received. Going forward it is recommended that CBG prepares a revised set of grievance categories that gives a more ‘fine-grained’ picture of the issues/events/actions which result in grievances being submitted. Also, annual numbers of grievances for all categories need to be analysed and presented, in a form that clearly shows upward or downward trends, both internally to senior managers and externally via Annual Monitoring Reports provided to Lenders.

As of February 28, 2021, five grievances were recorded for 2021; all from the mine zone: four are related to mining operations (one of which relates to compensation) and one relates to recruitment. All 2021 grievances were open as of 8 March 2021.

Of the 38 grievances received in 2020, 31 were closed and seven remain open as of 08 March 2021. All but one of the Hamdallaye/Fassaly Foutabhé RAP grievance is closed. The open grievance relates to loss of grazing area by some pastoralist residents of Hamdallaye. This

grievance is proving difficult to resolve; however, negotiations are continuing. Two grievances are now being considered by the courts but remain recorded as grievances<sup>13</sup>. Of the four remaining open grievances, CBG is acting to resolve and then close them.

In previous IESC monitoring reports, the IESC has noted that some grievances take more than six months to be closed. Of the open 2020 grievances, most were recorded before August 2020 making them more than 6 months old at the time of the March 2021 site visit. The IESC noted, in its previous monitoring report (July 2020 site visit), the effort that CBG was making to accelerate internal co-ordination and decision-making with respect to grievance management by means of the HSECQ Monthly Committee Meetings, which focus on community grievances, blockages and possible solutions. It perhaps too soon to see a noticeable and sustained reduction in the number of 'old' open grievances; however, it is reasonable to expect to see a trend toward such a reduction over the next two years. Tracking grievance closure times will be a feature of future IESC site visits and reporting.

#### *Legacy grievances*

In the IESC's July 2019 monitoring report, there is an account of three open legacy grievances (one grievance from 2016 and two grievances from 2018). One of the 2018 grievances (concerning a fire affecting cashew trees at Bhoundouwadé) has entered a judicial process and both the procedure and outcome is now outside CBG's control. The other 2018 legacy grievance was closed in May 2020 (see IESC's July 2020 monitoring report).

The outstanding 2016 grievance concerns the closure/rehabilitation of a quarry at Bintimodia. In early March 2020, the Bintimodia Commune authority sent an official letter to CBG stating its wish to have the road of Bintimodia rehabilitated instead of the closure of the quarry. CBG began work to rehabilitate the road (22 km), but work was suspended due to the rainy season. It was understood by the IESC, at the time of the July 2020 site visit, that road rehabilitation works would be completed by the end of December 2020. However, during the March 2021 site visit the IESC was informed by CBG that completion was expected by end April 2021. This grievance remains open, but it is encouraging that work is progressing to achieve closure within the next few weeks.

#### 5.5.4 Community requests for assistance (*doléances*) (2020)

At 31 December 2020, 25 requests for community assistance were received in 2020 (the same number as received in 2019); mostly from the mine zone (12) and the rail area (11) with two from the port area. In 2019, the figures were 19 from the mine zone and 6 from the rail zone. The higher number from the rail zone in 2020 perhaps reflecting, in part, the scale and type of the continuing construction activity for the MUOA Project and, therefore, more 'visibility' for CBG along the railway. Forty percent (40%) of community assistance requests were related to opening and/or rehabilitating community roads, 20% for basic social infrastructure construction (such as a school, or health centre), 20% for services, 8% related to the environment, and 12% for others. This breakdown is similar to the 2019 figures.

CBG has provided data regarding the status of the 25 requests for community assistance, as follows:

- Eleven community assistance requests were closed;

<sup>13</sup> During the March 2021 site visit, CBG sought the advice of the IESC/Policy Lenders on whether grievances, that complainants want to be decided via a judicial or administrative process, should be removed from the register. The IESC/Policy Lenders recommended that CBG does not remove such grievances from the register, but instead tracks the case, records the formal acceptance by the court that it will 'hear' the plaintiff's case and later, on the basis that the court does 'hear' the plaintiff's case, records the verdict of the court in the register with a statement that the grievance is closed, as per the court's verdict

## CBG BAUXITE MINE

- Five community assistance requests were directed to local authorities, specifically those related to basic social infrastructure construction. Communities were reminded of the CBG process for financing social infrastructure;
- Seven community assistance requests are being processed; and
- Two community assistance requests were refused (one – reopening of the road leading to the Kolaboui Commune HQ - because the cost was too high; and the other because the request, from the Boké mayor's office [*mairie*], for a decommissioned 200 kVA generator set could not be met, as CBG did not possess such a generator).

For 2021, at the time of the March 2021 site visit, four community assistance requests were received: two for the Port zone and two in the mine zone, as follows:

- Two requests are related to community road reprofiling (one in Kamsar and one in Sangarédi);
- A request related to providing for an endowment for equipment for the 'Case Baga' in Kamsar; and
- A request by the village of Diandian Missidhè for equipment for pump drilling.

No decisions have been made as to whether these requests will be accepted, refused or passed to local authorities. To help improve management of both grievances and *doléances*, the CR team now have dedicated personnel responsible for managing/monitoring grievances (one in Kamsar and one in Sangarédi) with the same system for *doléances* management and monitoring.

#### 5.5.5 Registers: Community grievances and community requests for assistance (*doléances*)

Grievances and *doléances* are recorded in separate registers. In the July 2020 monitoring report, the IESC recommended that both registers should contain a dedicated additional column to present a summary of action/s taken to address/respond to a grievance or a *doléance*. An examination of the registers, presented during the March 2021 site visit, show that this recommendation has been addressed. Table 5-3 shows a section of the grievance register with a column headed 'Actions'. The register of *doléances* contains a similar column.

**Table 5-3: Section of Grievance Register showing the 'Actions' column**

Service		HSEC		Taux d'avancement : 88.1%				Pilote : Habib Diallo				
Situation actuelle :		Résultats attendus : Cloture des plaintes et satisfaction des communautés						Ouvert le : 19/01/2015	Maj le : 11/03/2021	Fermé le :		
Cause/Constat :	N°	Actions	Type action				Priorité	Responsable	Ressources	Date		Commentaires
			P	D	C	A				Prévue	Réalisée	
200102_IR_Plainte d'un citoyen de Parawi pour destruction de plants d'anacardiers sur le plateau de koobi.	1	Enregistrer la plainte et diligenter une mission de constat sur le site mis en cause pour vérifier les faits.					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction HSEC	10/01/20	10/01/20		
		Dénombrer et évaluer les impacts causés par les opérations.					Coordonnateur compensation.	Direction HSEC	24/01/20	27/01/20		
		Compenser les biens détruits.					Coordonnateur compensation.	Direction Mine	31/03/20	13/11/20		
		Cloturer la plainte.					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction HSEC	01/04/20	13/11/20		
200102_IR_Plainte d'un citoyen de Niangaba pour destruction de plants d'anacardiers sur le plateau de Koobi.	2	Diligenter une mission de constat sur le site mis en cause pour vérifier les faits.					Coordonnateurs sectoriels relations communautaires Sangarédi et équipe PARC	Direction HSEC	10/01/20	06/01/20		
		Rencontrer le directeur de la mine pour lui faire le point sur le constat effectué sur le terrain.					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction HSEC	10/01/20	10/01/20		
		Compenser les biens détruits.					Coordonnateur compensation.	Mine	31/03/20	13/11/20		
		Cloturer la plainte.					Coordonnateurs sectoriels relations communautaires Sangarédi.	Mine	31/03/20	13/11/20		
200104_IR_Plainte d'un cotoyen de Sinthiourou Lafou pour dépassement limite de décapage a Ndangara.	3	Constater les faits sur les lieux suite à l'alerte du chef secteur					Coordonnateurs sectoriels relations communautaires et vice Maire Sangarédi.	Direction HSEC	06/01/20	06/01/20		
		Rencontrer le Maire pour lui faire la restitution du compte rendu du constat préliminaires effectué par l'équipe relations communautaires.					Coordonnateurs sectoriels relations communautaires et vice Maire Sangarédi.	Direction HSEC	22/01/20	22/01/20		
		Visiter le site mis en cause avec les superviseurs de la mine pour une description détaillé des activités menées dans cette zone en exploitation afin de justifier le non fondement de la plainte.					Coordonnateurs sectoriels relations communautaires et opérateurs miniers.	Direction Mine	29/01/20	29/01/20		
		Organiser une réunion sur le site avec le plaignant, les sages du village, le vice-maire, un conseiller communal et l'ERC pour une clarification sur le fondement de la plainte.					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction Mine	30/01/20	30/01/20		
		Rédaction d'un mémo pour la clôture de la plainte					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction Mine	10/02/20	10/02/20		
		Clôture de la plainte					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction Mine	28/02/20	13/03/20		
200114_IR_Plainte de la communauté de Hamdallaye pour décapage site inventoriée non compensé à Ndagara.	4	Rencontrer les responsables des opérations minières pour discuter de la gestion de la plainte.					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction Mine	15/01/20	15/01/20		
		Organiser une séance de sensibilisation des plaignants pour la continuité des travaux sur le site en attendant la vérification dans la base de données de 2015					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction Mine	16/01/20	16/01/20		
		Organiser une visite de terrain avec les autorités et la communauté pour constater les faits.					Coordonnateurs sectoriels relations communautaires Sangarédi.	Direction Mine	16/01/20	16/01/20		
		Procéder à l'analyse des données et produire une carte de la zone impactée					Coordonnateurs sectoriels relations communautaires Sangarédi et équipe PARC	Direction Mine	05/02/20	05/02/20		
		Procéder à l'évaluation des superficies perturbées en fonctions des données de INSUCO					Coordonnateurs sectoriels relations communautaires Sangarédi et équipe PARC	Direction Mine	05/02/20	05/02/20		
		Procéder à la compensation des PAPS					Coordonnateur compensation.	Direction Mine	31/03/20	29/06/20		

## 5.6 Management of Change

Change requests are managed in accordance with CBG's Management of Change (MoC) Procedure, dated January 2019. The responsibility for the coordination of change requests has been transferred to the Quality team (within the HSECQ Department) since the implementation of the Procedure was last reviewed by the IESC. Change requests are tracked using a simple spreadsheet, with relevant details, including the categorisation of change recorded.

Categorisation of change, as a level 1, 2 or 3 change, is based on the potential for HSE or social impacts, with category 2 and 3 triggering additional notification and reporting requirements to Lenders. Categorisation is therefore an important function and is typically conducted by a working group that is comprised of the Change Initiator, Quality Team and other specialists from HSECQ depending on the nature of the change.

The latest MoC register was reviewed during the VSV. The IESC was able to recognise Category 2 changes from its knowledge of the CBG's activities, noting that many related to the revision of management plans that have been prompted by the ESAP. Other observations were as follows:

- The format of the Change Register has changed and covers the period from mid-2020 onwards;
- The majority of changes were Category 2, whereas the IESC expected the majority of change requests to be Category 1. The small number of Category 1 changes is inconsistent with the previous register where the majority were Category 1; and
- Whereas multiple change requests have been consolidated on occasions, the total number of changes is still less than would be expected based on review of the earlier register.

The relative proportions of the three categories, combined with the relatively small number of changes since mid-2020, suggests not all change requests are being captured. CBG confirmed that different departments are made aware of the MoC Procedure, although this has tended to be via an unstructured department-by-department approach. Whereas the IESC acknowledges (and is aware from previous monitoring visits) that the MoC Procedure has been disseminated it is concerned, nevertheless, that awareness and use of the MoC appears to be inconsistent across departments. It is therefore recommended that dissemination and awareness training is repeated and the relative number of Category 1, 2 and 3 changes monitored to ensure they result in the expected pyramid structure (with a majority of Category 1 changes forming the bottom of the pyramid). It is further recommended that the entries in the earlier register are merged with the current register. Finally, the Quality team should consider better liaison with the Procurement Department on the IESC's understanding that many changes require purchase of goods and services, and thus the Procurement Department is able to alert the Quality team of any missed change requests.

## 5.7 Dredging

### 5.7.1 Dredging Campaign in 2020

During the July 2020 VSV, CBG informed the IESC that dredging of the port was scheduled for later in 2020. In fact, the dredging campaign was conducted in late August 2020 prior to the fish spawning period. The IESC can confirm an LDP<sup>14</sup> was prepared and approved prior to the start of dredging. In addition to the seasonal constraint, other sensitivities were considered and mitigation measures implemented via the LDP where necessary, including underwater noise monitoring, measures relating to the avoidance of marine mammals, protection of mangroves and phytoplankton biomass.

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<sup>14</sup> Permis de dragage, No. 2020/01/PD

However, the IESC notes that two actions specified in the Dredge Management Plan (DMP) were not implemented:

1. A complete environmental characterization of sediment from the dredging area and disposal area (including bioassays if necessary); and
2. A complete characterization of the benthic fauna from the dredging area and disposal area.

The characterization of sediments, both at the dredge location and disposal site is standard good practice<sup>15</sup>.

The IESC acknowledges that sediment samples in the general vicinity of the port have been collected historically as a part of CBG's general environmental monitoring programme. Also, it is understood that, during the 2020 dredging campaign, dredged materials were deposited in an area referred to as A3 at a location south west of the port (Figure 5-3). This area has been used on numerous occasions by CBG during previous dredging campaigns and is therefore considered to be a disturbed habitat. These two factors do reduce the risk of avoidable environmental harm, however future dredging campaigns should adhere to all DMP requirements.

The DMP also specifies the need for turbidity monitoring during dredging operations with an action to temporarily halt dredging *'when TSS concentrations calculated during dredging are greater than 25 mg/litre of the natural concentration at 100 m of work measured for more than 6 consecutive hours'*. CBG confirmed turbidity monitoring was conducted during dredging in 2020 with samples collected 150m in front and behind the dredger at two depths. Average turbidity levels are then calculated and compared with the 25mg/litre threshold.

The IESC makes the following observations relating to turbidity sampling conducted in the 2020 campaign.

1. Sediment plumes are likely to occur down current of the dredger thus resulting in wide turbidity fluctuations surrounding the dredger (where a current prevails). Efforts should therefore be made to sample within the plume i.e. sampling should be conducted downstream of the dredger (in the plume);
2. In situations where there is a sediment plume, i.e. a predominant current and when sampling occurs at two locations (one outside and one inside the plume), the averaging of results is likely to underestimate elevated turbidity levels because only one of the two sampling locations will be in the plume; and
3. The DMP makes reference to sampling 100m from the vessel, whereas the IESC was informed that sampling took place at 150m from the vessel.

The IESC, therefore, recommends that the EMTL reviews sampling protocols prior to future dredging campaigns to ensure a robust scientific approach is employed taking account of the variables (location of dredging, tidal conditions etc.) associated with each campaign.

### 5.7.2 Dredging Campaign in 2021

One of the findings in the contractor's dredging report<sup>16</sup> was an underestimation of the volume of sediment to be dredged in the 2020 campaign. CBG believes volumes were underestimated because of increased sediment loadings and deposition in the estuary, possibly as a result of

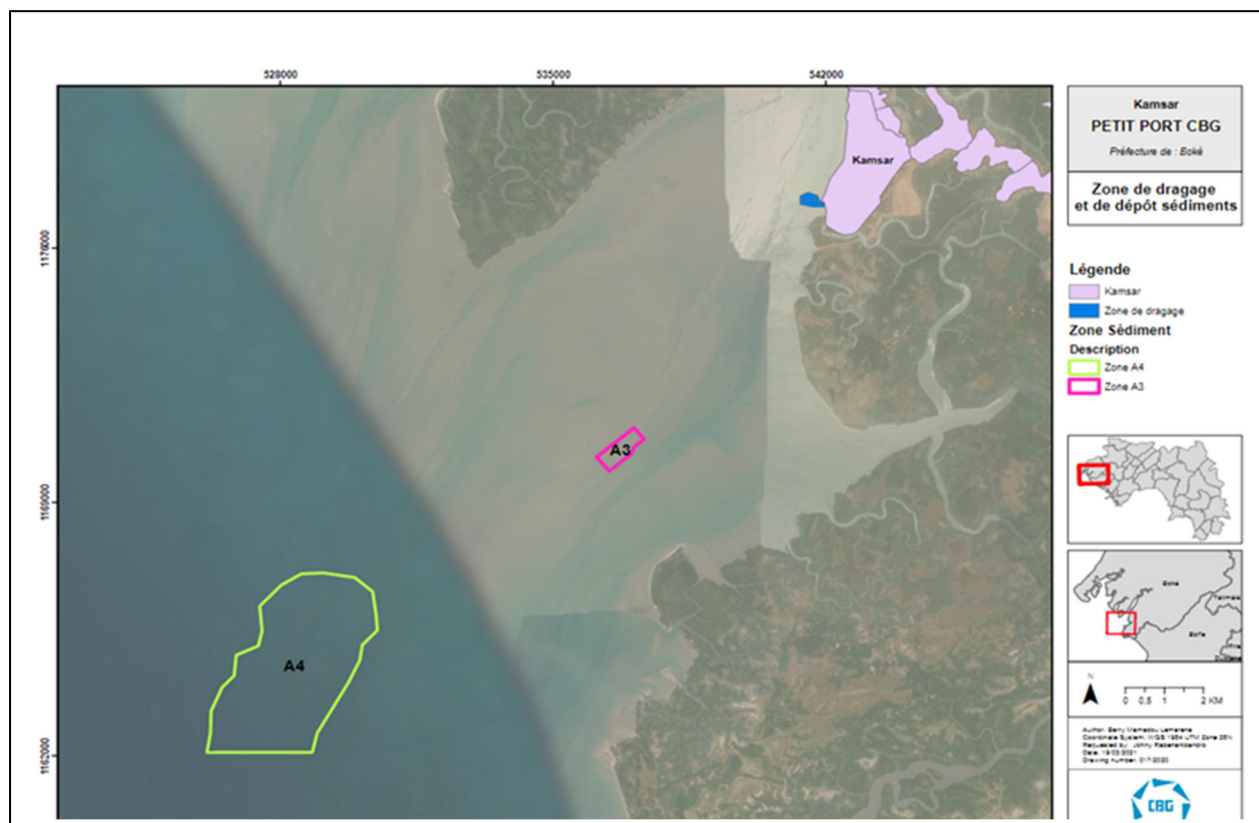
<sup>15</sup> Prior to initiation of dredging activities, materials should be sampled and characterized for their physical, chemical, biological, and engineering properties to inform the evaluation of dredged materials behaviour once re-suspended, and to inform their reuse or final disposal. In addition, ecotoxicological risk analysis of sample materials should be conducted to assess risks to representative organisms in the area of influence. Ref. IFC Guidance reference in the DMP.

<sup>16</sup> MAINTENANCE DREDGING WORKS OF THE ENTRANCE CHANNEL AND BERTHING AREA AT THE PORT OF KAMSAR, REPUBLIC OF GUINEA CAMPAIGN 2020, Final Report, Dredging International Services, September 2020.



increased shipping and construction activity from CBG and other operators in the area, although this is not confirmed as a cause, nor is it clear whether the increased sedimentation is a temporary effect. Regardless of cause, the increased sedimentation has prompted the need for a further dredging campaign in 2021.

Preparations for the 2021 dredging campaign are currently underway and expected to be completed well ahead of September 2021 to avoid the aforementioned seasonal constraints. CBG intends to use the same spoil disposal location used in 2020 (the A3 site), subject to results of a bathymetric survey showing receiving capacity is sufficient. In the event the A3 site does not have the capacity to accommodate the spoil a second larger site, referred to as A4, located further offshore can be used (Figure 5-3).



**Figure 5-3: Location of A3 (used in 2020) and A4 dredge disposal sites**

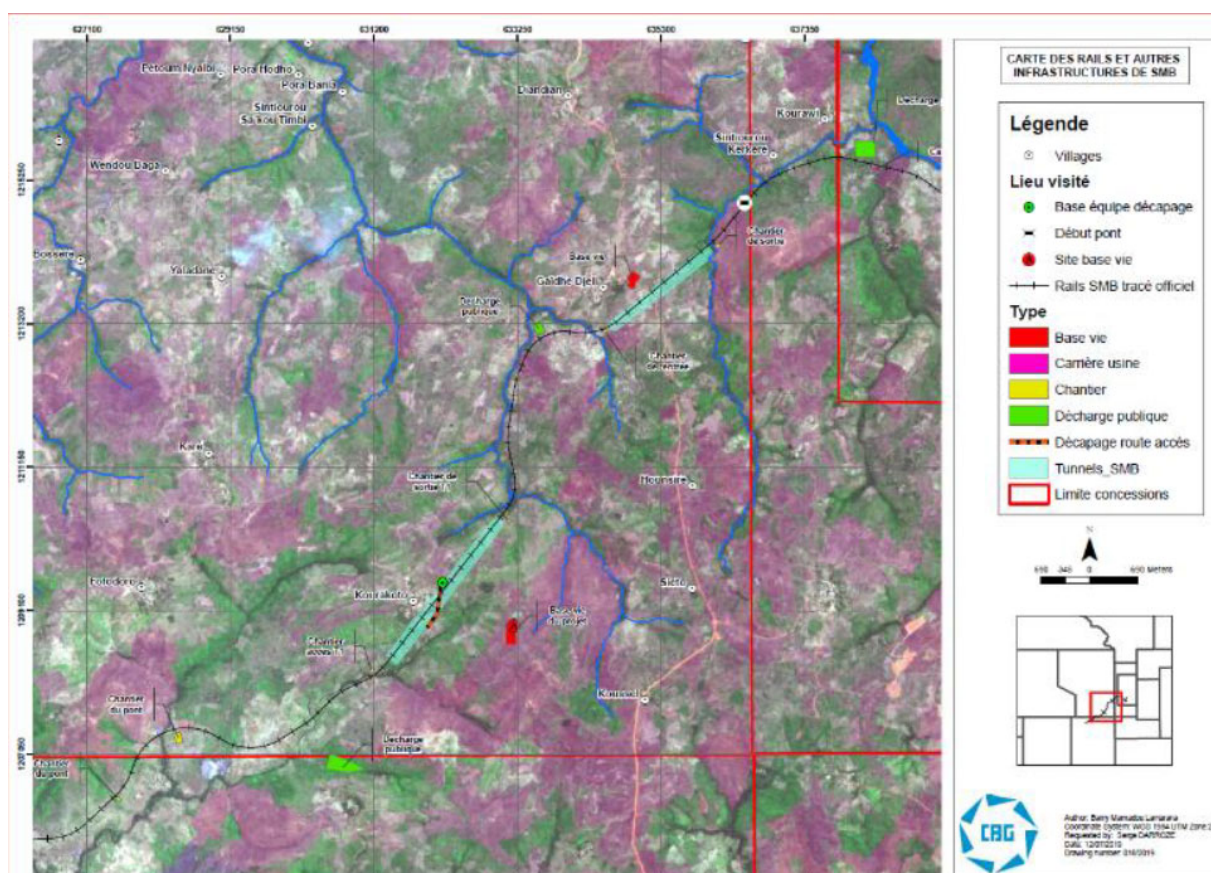
The IESC recommends that the suitability of the A4 site is confirmed prior to its use, with site characterization performed in line with the DMP and the recommendation made in Section 5.7.1. Furthermore, a bathymetric survey to confirm the suitability of A3 should be conducted at a time that allows for the sampling of sediments (including benthos) in the A4 disposal site, should it be required, well in advance of any future dredging campaign, inclusive of the 2021 campaign.

## 5.8 SMB-W Railway

The IESC provided commentary, in its previous monitoring report, on CBG's responsibilities and actions with respect to the SMB-W railway, which traverses approximately 10km of the south east area of CBG's South of Cogon concession area (Figure 5-4) and is currently being constructed for the transportation of bauxite. Construction is scheduled to end in mid-2021.

In accordance with a Memorandum of Understanding between CBG, SMB-W and GoG (represented by the Ministry of Mines and Geology and the Ministry of Environment, Water and Forests), which requires implementation of CBG standards (including application of IFC Performance Standards) for activities undertaken in the CBG concession, CBG continues to deploy

multidisciplinary teams<sup>17</sup> to undertake inspections of SMB-W's activities. Inspections are scheduled fortnightly, although some inspections have not been possible due to COVID-19 restrictions, such that 9 out of a scheduled 24 inspections did not take place in 2020.



**Figure 5-4: SMB-W railway located in South East corner of CBG's concession**

CBG has adopted a collaborative approach, working with SMB-W and BGEED (an agency of Ministry of Environment, Water and Forests) to identify poor HSEC practices and encourage improvements in HSEC performance. The IESC acknowledges the success of this approach, as evidenced by the reported closure or ongoing status of 43 out of 51 corrective actions identified in 2020.

In its previous monitoring report, the IESC highlighted two areas of concern relating to:

- adequacy of temporary construction camps housing foreign nationals and non-local Guineans. CBG has been unable to enter and inspect the camps because of concerns over COVID-19 risks. The IESC therefore repeats its recommendation that further consideration is given to compliance with PS2 (LWC requirements) once inspection of camp facilities can be conducted safely. In particular, CBG should endeavour to inspect workers' camps and living conditions and speak to workers about physical and contractual conditions. At the same time, the IESC does acknowledge corrective actions already initiated following earlier CBG inspection findings, as reported in CBG's inspection register<sup>18</sup>. For example, the construction of improved toilet and washing facilities; and

<sup>17</sup> Inspection teams comprise at least 4 specialists covering environmental, social, biodiversity, H&S aspects.

<sup>18</sup> CBG maintains an audit and inspection register, inclusive of photographic evidences, that captures all inspection and audits finding, including those relating to SMB-W.

- ii) sale of bushmeat to workers. It is understood that farmed pigs are now providing an alternative source of meat and incidence of bush meat sales is less common (see also Section 10.2.2).

The IESC also highlighted influx as an issue of concern, especially impacts resulting from the establishment of informal dwellings/stalls in proximity of workers' camps. With the anticipated demobilisation of workers in the middle of 2021, in-migration is expected to cease as opportunistic settlers return to their permanent homes. However, CBG is not aware of SMB-W's plans for demobilisation of its construction workforce, nor its plans for reinstatement of temporarily affected land, including land used for the informal settlements. It is therefore recommended that CBG engages with SMB-W and BGEEE to understand and influence SMB-W's plans for demobilisation of workers and reinstatement of temporarily disturbed land to ensure alignment with IFC PSs. This may be particularly important where contractors that are planning to demobilise will be required to reinstate disturbed areas before they leave. See also Section 10.2, SMB-W Biodiversity inspections.

### 5.9 Contractor management – bid evaluation and award of contracts

As stated in the IESC's July 2020 monitoring report, the Contractor Management Plan (CMP) has been in place since January 2019. Through the implementation of the CMP, CBG commits to the following during the bid evaluation and award phase<sup>19</sup>:

- Include binding clauses in future contracts relating to E&S management plans;
- Evaluate HSEC performance during award evaluation process and eliminate contractors with poor HSEC practices at the bid stage; and
- Review contractors' documentation/management systems prior to mobilisation.

At the time of the previous VSV, work needed to implement the CMP was in progress and the IESC was unable to review an example contract and verify that the above actions were a part of established procurement processes. Further discussion on this topic took place during the March 2021 VSV during an interview with members from the HSECQ Department (including the HSECQ Director) and the Director of the Procurement and Logistics Department.

During these discussions, the integration of HSECQ requirements within the current procurement process was explained as follows:

1. The Procurement and Logistics Department manages the procurement process working closely with other departments, including the HSECQ Department, as necessary.
2. In addition to the CMP (which provides linkages to specific ESMPs), simplified HSECQ requirements (Minimum HSECQ Requirements) are appended to all contracts. The minimum requirements address social, environmental, health and safety (including labour conditions) and biodiversity.
3. The simplified HSECQ requirements are supplemented with additional requirements, as necessary, where the risk profile of a contract merits additional consideration of HSECQ matters.
4. Bids are received and scores given for different elements of the submission, including HSECQ.
5. Bidders are eliminated if a threshold score for HSECQ is not met (regardless of scores awarded for other elements of the submission such as technical or commercial content).

<sup>19</sup> Monitoring of contractors following award of contract is addressed via CBG's audit and inspection programme.

6. The Procurement and Logistics Department prepares a report summarising the evaluation of bid submissions.
7. Bid award is made by a joint evaluation committee which includes HSECQ representation as evidence by minutes of meetings requested by the IESC.

In addition to exceeding the threshold HSECQ score (item 5 above), the IESC understands the HSECQ score is further considered in later stages of the evaluation i.e. following the pass/fail threshold, such that high scoring bidders have an advantage over those that might only just exceed the pass/fail threshold. Following award of contract and an initial kick off meeting, contractors are then expected to undertake several Risk Assessments (RA) and Job Safety Analyses (JSA) prior to the issuance of a Permit to Work (PTW) by CBG.

During the VSV, the IESC received a recently-prepared contract for annual maintenance dredging works in 2021<sup>20</sup> and is able to confirm this includes the simplified list of HSECQ requirements in Annex D, plus supplemental HSEC requirements tailored to the risks of the work to be undertaken by the contractor both during and following dredging activities, related mainly to biodiversity actions. Although included in the dredging contract, the IESC was informed that the HSECQ Minimum Requirements are currently being reviewed and are likely to be revised.

From the discussions held during the VSV, there is good interaction between the HSECQ and Procurement teams. In addition to the minimum requirements, the weighting assigned to HSECQ submissions is also under review with the potential for HSECQ to receive up to 30% of the available marks in the evaluation process. The HSECQ weighting will be tailored, depending on the nature of the bid opportunity. The IESC accepts the weighting afforded to HSECQ matters should be tailored to the level of HSECQ risk, that is, it would be inappropriate to assign a significant weighting to HSECQ matters where there is no HSECQ risks associated with the work to be completed.

The IESC also notes there are requirements placed on Contractors within the Local Content Plan that relate to reporting on employment and training. Such requirements are not captured/duplicated in the CMP and therefore could be potentially omitted. This specific topic is described further, along with IESC recommendations, in Section 6.4, LWC in Contractor Management.

### **5.10 Emergency Response Planning**

CBG's emergency response preparedness planning includes quarterly exercises simulating potential emergency situations. The exercises involve the physical deployment of equipment and personnel, rather than being desk-top exercises. The IESC reviewed the emergency exercise programme for 2021 and makes the following observations and recommendations.

The exercise programme for 2021 had a bias towards fire-related incidents, possibly because the exercises were largely specified by the Fire Department. Whereas the scenarios were considered valid, and included elements of search and rescue, medical treatment etc, further thought needs to be given to other non-fire related incidents for 2021. It is therefore recommended that CBG's HSECQ Department has greater influence in determining the year's exercise programme (and future programmes), taking account of CBG's full spectrum of activities and priority risk areas.

The IESC also reviewed several exercises carried out in 2020. These exercises were more varied in nature and included a medical rescue and treatment from the primary crusher pit and oil spill at the port (Figure 5-5 and Figure 5-6). following a recommendation made by the IESC in a previous a monitoring report. For the former, the IESC welcomes CBG's direct response to an earlier recommendation and notes the exercise resulted in some significant findings (access

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<sup>20</sup> Scope of Work for Annual Maintenance Dredging (Channel and basin) at the Port of Kamsar. DA 10159704, February 2021.



restrictions, delayed availability of a stretcher) and the identification of corrective actions to prevent reoccurrence in an actual incident.



**Figure 5-5: Medical evacuation exercise in the crusher pit**

The oil spill scenario was based on a release of spill from a GAC<sup>21</sup> ship and involved a joint response by CBG and GAC. The IESC fully supports the sharing of oil spill resources between neighbouring mining operators and the joint exercise approach. However, the Emergency Response Plan (ERP) does not recognise interaction/agreements with certain third parties, including GAC, and should be revised accordingly to include communications protocols and, in the case of oil spills (and other scenarios as applicable), the sharing of response resources. The IESC is aware that the ERP is current being revised, thus presenting a timely opportunity for CBG to amend the ERP in line with the recommendations above.



**Figure 5-6: Joint CBG and GAC oil spill exercise in 2020**

<sup>21</sup> GAC is the neighbouring concession and exports bauxite from a jetty adjacent to CBG's export jetty.

## 5.11 Land Rehabilitation and Relinquishment

### 5.11.1 Context

This section focuses on a single aspect of land rehabilitation and relinquishment; namely land that is subject to mining and whose characteristics are altered, fundamentally, by the mining process. It does not relate to land upon which CBG's infrastructure/facilities for transport and processing of bauxite is located.

To date, CBG has rehabilitated nearly 2000 ha of mined land. Under the current (draft) 5-year Land Rehabilitation Plan, CBG intends to rehabilitate 250 ha/year over the period 2021 to 2025; thus, by end 2025 the total rehabilitated land area will be approximately 3250 ha in the South of Cogon concession area (it should be noted that, for most of the land 'rehabilitated' in the period 2021–2025, the land will not be considered to be sufficiently resilient for community use until approximately five years has elapsed since planting began).

Almost all the rehabilitated land was land where bauxite was extracted under the Basic Agreement, signed by CBG, the Government of Guinea and the National Agency for Mining Infrastructure Development in 1963 and amended subsequently thereafter. This Agreement grants CBG a right to exploit the ground surface for the mining bauxite (may be considered to be a 'mining' title) and title over land required for infrastructure for processing of bauxite. CBG's mining title does not affect the rights of owners, usufructuaries (those with a right to use land and benefit from the use/s without owning the land), and occupants of the land; essentially, mining rights do not extinguish pre-existing property rights for the land areas subject to mining. This Agreement requires CBG to rehabilitate mined land.

Land in Guinea belongs to the State; thus, all land mined by CBG is State land. However, the State recognizes customary rights to land occupancy and use which, in the mined areas, means mainly crop agriculture, grazing for pastoralists and places of habitation (hamlets and villages). CBG's mining-related activities result in land disturbance which can result in the physical and/or economic displacement of people occupying/using the land (physical displacement may occur also, if pollution levels are considered to cause too many health/safety risks to local people). CBG applies the principles and requirements of IFC's PS 5 to manage land disturbance and its impacts on local people and their livelihoods.

Once mining in an area (often a specific plateau) is completed CBG must rehabilitate it. If CBG wishes, it can relinquish, also, its mining rights (title) to a specified area; essentially, formally notifying the State that it will no longer exercise its mining rights. The result of relinquishment is that previous holder/s of rights to the land (in this case the State) can exercise those rights that they were not able to do, previously, due to CBG's activities. People with customary land rights are not involved in the formal relinquishment process

Of note, CBG can request allocation of mining rights to previously mined land, for which it had relinquished its previous mining rights. If the requested mining rights are granted by the State, then any rehabilitated land can be re-mined.<sup>22</sup> Also, if CBG has not relinquished its rights then it can resume mining in previously mined and rehabilitated areas at any time (in practice it is easier to re-mine in early stages of rehabilitation as the vegetation cover is less; however, mature vegetation can be removed to enable mining). In both cases, the existing PS5-compliant process will be applied to land disturbance impacts. However, there is no 'guarantee' that the exercise of land rights by existing rights holders (formal or customary) will not be interrupted by mining for a second time.

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<sup>22</sup> The Mining Rehabilitation Conceptual Closure Plan suggests that pits that are scheduled for multiple entries will not be rehabilitated for closure and relinquishment until there is certainty that final resource extraction is complete.

### 5.11.2 Current CBG practice

CBG has no formal/written procedure governing the land rehabilitation and relinquishment process and future end uses of the land, especially with regard to the resumption of the exercise of rights by land rights holders such as local governments, as local entities representing the State, and customary land rights holders. It is the latter group of land rights holders that is of concern from an E&S compliance perspective.

CBG implements an informal procedure, which has the following key elements, to implement land rehabilitation/after-use by customary land rights holders:

- Decision on priority areas to be rehabilitated, for example, through mechanisms as the 5-year Land Rehabilitation Plan;
- Consultation with local community/ies, with customary rights to the land to be rehabilitated, in the decision-making process with respect to land rehabilitation timetable, species to be used in rehabilitation and end uses/management of the rehabilitated land;
- Site visit/meeting with local authorities concerning the land rehabilitation to ensure agreement on the land rehabilitation process/end result (local authorities are the entities best placed to inform/confirm to communities that CBG has relinquished its mining rights; however, there is no formal process by which this can occur);
- Involvement of community-based enterprises (TPEs<sup>23</sup>) in managing nurseries for plants to be used in the rehabilitation and in the planting process. This is done via contracts with the enterprises; thus, creating local temporary employment and providing an income 'boost' to the local economy; and
- Enabling the communities with customary rights holders to manage the exercise of their rights once the land is rehabilitated to a stage where these rights can be exercised effectively.

The lack of formal/written procedure means there are a few records of decisions on such matters as agreed rehabilitation end use and indicators of completion (when is rehabilitation considered to be complete for end use/s to begin). As indicated above, the rate of land rehabilitation will increase to 250 ha/year over the next five years and, possibly, increase further after 2025. This creates a situation with a greater potential for disputes to occur and an informal procedure is unlikely to be appropriate or sustainable in the long term. Given the relatively rapid increase in the availability of rehabilitated land over the next 5 years, and the accompanying increase in community access to using this land, it is appropriate to consider progress in implementing the actions contained in the Mine Rehabilitation and Conceptual Closure Plan (MRCCP) - approved by CBG in December 2018 - concerning relinquishment in relation to mined land and community usage (see Section 5.12 below).

## 5.12 Mine Rehabilitation and Conceptual Closure Plan: Implementation of relinquishment actions

The MRCCP states that CBG's existing land rehabilitation framework does not contain all the formal processes required to meet international good practice/standards, including:

- Relinquishment strategies for closed mine pits; and
- Methods for relinquishing title to customary land users.

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<sup>23</sup> TPEs = *Toutes petites entreprises*. Since 2010, CBG has collaborated with local authorities in supporting local entrepreneurship through the set-up of very small businesses, supported by a dedicated \$200,000 USD revolving fund. These TPEs (currently there are 14 TPEs) mainly operate in the following sectors: construction and maintenance, sanitation, land rehabilitation and reforestation, and gardening.

Given its findings on the suitability of CBG's existing land rehabilitation framework, the MRCCP identified the following general priority action:

- Conduct ongoing stakeholder consultation, with respect to the following:
  - Community expectations for post-closure land uses;
  - Government involvement for relinquishment of post-closure domains and protocol for transfer of title;
  - Closure funding mechanisms; and
  - Processes for hand-over or sale of facilities wanted post-closure, including closure review team, maintenance regime, remedial actions required, community health and safety, etc.

In addition, for mine pit rehabilitation, the following priority action is identified:

- Collaborate with government authorities regarding formal relinquishment process following documented achievement of completion criteria [IESC note: applies to land rehabilitation].

Finally, in terms of monitoring and reporting:

- Consult with Government regarding a framework for reporting closure against completion criteria to formalise relinquishment.

The MRCCP does not provide a time-bound period timeframe for these actions to be implemented; describing them as being 'ongoing' with a start time of end 2018, except for the final action listed above which has completion date of end 2018. To date, the IESC understands that CBG has not progressed work against these priority actions. Given the increasing pace of land rehabilitation, it is recommended that CBG initiates work immediately to formalize its current practice of mined land rehabilitation, with respect to community involvement and relinquishment, into a written procedure which includes not only actions and responsibilities, but also standardized documents, to be signed by all parties, which record agreements reached/actions completed. This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP relevant to mined land rehabilitation and relinquishment.



**Table 5-4: Summary of Findings, PS1**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2021_001	SEP revision	Currently, the CR team is preparing a revised version of the SEP for the period 2022 to 2025.	All	CR team to consider carefully, the lessons learnt from implementing the current SEP and its likely future commitments, when revising the SEP and ensures that the revised SEP presents a realistic, pragmatic and flexible set of requirements that are implementable in the period 2022 to 2025.	<b>Minor</b>
March 2021_002	Management of Change	The relative proportions of the three categories, combined with the relatively small number of changes since mid-2020, suggests not all change requests are being captured.	All	<p>CBG to repeat dissemination and awareness training of the MoC Procedure.</p> <p>An internal audit of the Procedure's implementation by different departments would inform the extent of its use and inform any corrective actions to improve use of the MoC Procedure, if required.</p> <p>Furthermore, the Quality team should consider better liaison with the Procurement Department on the IESC's understanding that many changes require purchase of goods and services, and thus the Procurement Department is able to alert the Quality team of any missed change requests.</p>	<b>Moderate</b>
March 2021_003	CR team recruitment	There are several expected future work commitments that will put pressure on the existing CR team resources, potentially leaving the CR team with insufficient resources to meet these commitments effectively.	All	CR Manager to evaluate not only the CR team's current and future workload, but also the geographic locations where it is likely be working, when identifying its future likely recruitment needs in the forthcoming revised Recruitment Plan.	<b>Moderate</b>
March 2021_004	CR team resources	The allocation of a 4x4 vehicle from CBG's fleet (with 'delivery' expected by end January 2021) to the CR team has not occurred	All	The 4x4 fleet vehicle to be allocated without any further delay or a replacement vehicle is hired if the maintenance and safety checks find that repairs to the fleet vehicle are required. If	<b>Minor</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				no fleet vehicle can be allocated by end April 2021, then it is recommended CBG purchase a vehicle of equivalent passenger capacity and performance	
March 2021_005	NoCo Exploration	Community consultations occur after the E&S Rapid Appraisal stage. The draft Compensation and Resettlement Policy Framework shows that community consultations occur prior to impact mitigation measures being defined.	Exploration	One round of community consultations to be implemented as part of the E&S Rapid Appraisal stage, at a time which CBG considers most appropriate in the local context.	<b>Moderate</b>
March 2021_006	NoCo Exploration	The exploration campaign affects a relatively large area and application of the LDP process to each annual drilling campaign means that the cumulative impact of the three drilling campaigns in all three plateaux over a three-year period is not factor in drilling campaign decision-making for each LDP.	Exploration	Undertake a rapid cumulative E&S assessment of the exploration campaign, as if it were a single project, prior to the first E&S rapid impact appraisal. This cumulative assessment to focus on identifying and evaluating the key risks/mitigation measures to inform the individual LDP-level E&S rapid impact appraisals.	<b>High</b>
March 2021_007	Revision of Environmental Management Plans	Certain Environmental Management Plans that were not affected by the MUOA project remain unchanged since they were approved in January 2019.	All	All plans, particularly those not subject to update to take account of the MUOA project, should be reviewed and updated in line with the 2-year review cycle, as described in Section 10 of the EMPs.  Revisions should include both an update of the content of the plan to reflect current status, decisions and actions, and also revision of the timeframes included in the associated actions plans	<b>Moderate</b>
March 2021_008	Social Management Plans	These Plans were approved in early 2019 and have a 2-year review cycle (except for the Local Content Plan which is to be reviewed, "...as appropriate"). Given the challenges that have emerged in	All	These Plans to are reviewed and updated in line with the 2-year review cycle. In this context, the CR team to evaluate and amend the Plan actions and timescales, as necessary, considering both the results to date from	<b>Moderate</b>

## CBG BAUXITE MINE

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		implementing the actions; these reviews provide an opportune moment for a comprehensive evaluation of the continuing relevance of all actions, especially, those actions that are continuous or on-going.		implementing the existing actions and, also, emerging issues that necessitate adding new actions. The amended Plans /Action Plans must identify priority time-critical actions.	
March 2021_009	Female participation in stakeholder meetings	CBG is attempting to ensure, via revised/new approaches, that female participation rates increase in CBG-led community stakeholder meetings. Currently, this initiative does not include contractors which will engage, also, with such stakeholders.	All	CBG to require its contractors to follow its lead in encouraging enhanced female participation rates; particularly contractors that are involved in preparing and/or implementing RAPs and LRPs.	<b>Moderate</b>
March 2021_010	Female submission of grievances	Grievances appear to be submitted exclusively by males.	All	As part of its efforts to increase female participation in stakeholder engagement, it is recommended that CBG considers ways in which women can be encouraged to submit grievances directly and not only via male relatives or male community members.	<b>Minor</b>
March 2021_011	Communications Plan for 2021	CBG's Communications Plan for 2021 does not include recent important HR documents in its employee 'explanation' actions.	All	The actions presented under 'Internal - Operational Excellence', concerning HR documents, should be amended to show the current new key HR documents and not only older, though still current documents.	<b>Moderate</b>
March 2021_012	Communications Plan for 2021	CBG's Communications Plan 2021 does not include a 'procedure' for managing external communications as required by PS1 (para. 34).	All	CBG to design a procedure for managing external communications and then inserts it into the Plan ready for implementation in 2022.	<b>Minor</b>
March 2021_013	Community grievances	CBG sub-divides grievances into three categories: 'economic', 'safety' and 'environment'. These are very broad categories.	All	A revised set of grievance categories to be developed and used to give a more 'fine-grained' picture of the issues/events/actions	<b>Minor</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				which result in grievances and to enable trends to be identified easily	
March 2021_014	Community grievances	Closure of grievances that complainants submit to a judicial or administrative process	All	Such grievances to be kept in the register until a) a formal decision is issued by the judicial/administrative authorities that the grievance will not be considered or b) a verdict is issued by a court or administrative entity. In both situations, the grievance can be recorded as 'closed' with reference made to the decision or verdict.	<b>Minor</b>
March 2021_015	Dredging	The 2020 dredging campaign did not strictly adhere to certain actions set out in the Dredge Management Plan.		Consistent with the DMP, CBG to undertake: i) a complete environmental characterization of sediment (including bioassays if necessary) and ii) complete characterization of the benthic fauna, from both the dredging and disposal areas. The properties of the dredged material (including toxicity) and sensitivity of the receiving disposal site (benthos) to be established in a timely manner, particularly if the A4 disposal location is to be used in 2021. The turbidity sampling protocol should be reviewed and prior to future dredging campaigns to ensure a robust scientific approach is employed taking account of the variables (location of dredging, tidal conditions etc.) associated with each campaign	<b>Moderate</b>
March 2021_016	SMB-W inspections	CBG is not aware of SMB-W's plans for demobilisation of its construction workforce, nor its plans for reinstatement of temporarily affected land, including land used for the informal settlements	Construction	CBG to engage with SMB-W and BGEEM in order to understand and influence SMB-W's plans for demobilisation of workers and reinstatement of temporarily disturbed land to ensure alignment with IFC PSs. This may be particularly important where contractors that are planning to demobilise will be required to reinstate	<b>Minor</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				<p>disturbed areas before they leave. Rehabilitation completion criteria, including those relating to biodiversity, should be agreed. In the event weaknesses are identified, CBG to work with SMB-W and BGEEE to improve reinstatement practices.</p>	
March 2021_017	Emergency Response Planning	The exercise programme for 2021 has a bias towards fire-related incidents	All	CBG's HSECQ Department should have greater influence in defining future exercise programmes, taking account of CBG's full spectrum of activities and priority risk areas.	<b>Minor</b>
March 2021_018	Emergency Response Planning	CBG's current ERP does not recognise interaction with certain third parties, including GAC.	All	<p>The ERP to be revised in recognition of third parties involved/impacted by CBG's emergency response planning. This will include:</p> <ul style="list-style-type: none"> <li>• communications protocols, and</li> <li>• in the case of oil spills (and other scenarios as applicable), the sharing of response resources.</li> </ul>	<b>Moderate</b>
March 2021_019	Land Rehabilitation and Relinquishment	CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues, despite the MRCCP presenting priority actions to begin by end 2018 (with one to be completed by end 2018).	Operations and Decommissioning	Work to be initiated immediately to formalize CBG's current practice, for managing mined land rehabilitation and relinquishment, into a written procedure which includes not only key actions and responsibilities, but also standardized documents, to be signed by all parties, which record agreements reached/actions completed. This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP, relevant to mined land rehabilitation and relinquishment.	<b>Moderate</b>

## 6. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS

### 6.1 Introduction

The March 2021 VSV focused upon three LWC topics:

- Occupational health and safety (including COVID-19 measures);
- Employment and employees; and
- LWC issues in contractor management.

Key findings are presented on each of these topics below.

### 6.2 Occupational health and safety

#### 6.2.1 HSE Performance

Analysis of HSE Key Performance Indicator (KPI) metrics for the year 2020 shows favourable results for several metrics with zero worker fatalities in 2020 (as was also the case in 2019 - see Table 6-1). There were, however, increases in 2020 in the number of Lost Time Incidents (LTIs) and Near Misses recorded. The increased number of Near Misses is thought to be a result of better Near Miss reporting, rather than an actual increase in Near Misses, and as such is likely to be a positive change<sup>24</sup>. The LTIs are however significantly higher than in 2019, increasing from 4 to 8.

**Table 6-1: Comparison of H&S KPIs in 2019 and 2020**

KPI	2019	2020	Trend
Fatalities	0	0	-
Lost Time Incidents	4	8	↑
Medical Treatment	9	3	↓
First Aid	59	35	↓
Near Misses	110	305	↑
Number of workers	5232	5019	

The increase in LTIs, is recognised by CBG and consideration has been given to the underlying causes with actions/initiatives identified to reduce LTIs in 2021. Serious Incident Investigations have also informed the audit programmes for 2020 and 2021 (see Section 5.2.1)

The LTIs are varied in nature and location, thus it is not possible to identify a trend or single root cause. However, CBG has attributed the incidents to a number of factors where improvements can be made, including poor discipline (breaking of CBG’s Golden H&S Rules and /or safety procedures), lack of supervision and training, poor lighting and the outdated railway signalling system (see Section 3.2) that is due to be replaced with a new signalling system including automated failsafe systems as part of the MUOA Project<sup>25</sup>. For the majority, if not all, the incidents were avoidable.

<sup>24</sup> The ratio of Near Misses:First Aid Case in 2020 is more consistent with a typical incident pyramid.

<sup>25</sup> Two of the LTIs relate to a single incident in which two locomotives collided at low speed.

CBG has implemented actions to minimise the likelihood of repeat incidents including provision of new equipment, the development of new procedures for boat-to-boat transfers and targeted inspection programmes for high risk activities/areas, notably rotating equipment. CBG also plans to restart its award programme, intended to highlight and reward employees that demonstrate good H&S practices, in 2021.

### 6.2.2 Data management Software

CBG intends to procure a data management system/software to automate much of its H&S management and reporting activity. The HSECQ team is currently receiving support from one of CBG's shareholders to design the system functionality and identify potential software products. In 2021, the HSECQ department will define its needs with the intention to procure the system/software in 2022. As part of the system design, the H&S team members will also assess the suitability of the data management system (IsoMetrix) recently procured by their Community Relations and Resettlement colleagues.

### 6.2.3 Falling rocks from tippler

In the July 2019 site visit report, the IESC reported evidence of falling rocks from the tippler (within the primary crusher station). The findings represented a significant safety concern requiring intervention by CBG. Access to high risk (drop zone) areas was restricted and, in October 2019, repair works were undertaken to increase the height of a retaining wall intended to prevent rocks 'leaking' around the retaining wall and falling from height as the tippler rotates (Figure 6-1). CBG has reported that the corrective works have been largely successful, although a small number of rocks continued to 'leak' around the wall. Thus, further remediation work was planned to stop 'leakage' of rocks, with access restrictions remaining in place until works are finalised and the effectiveness of further measures confirmed.

The issue of rock 'leakage' was revisited in the March 2021 VSV. The IESC has been informed that in addition to the retaining wall, new spillage plates were installed on the Phase 1 tippler in July 2020 and the earlier issue of rock fall has been resolved and earlier access restrictions have also been lifted.



**Figure 6-1: New impact walls on Phase 1 and Phase 2 tipplers - February 2020 (indicated by blue arrows)**

#### 6.2.4 COVID-19

The July 2020 VSV detailed the measures put in place by CBG, noting that the same rules are equally applicable to CBG contractors, including for example, continuation of pay when taking sick leave. The measures put in place as of July 2020 remain in place and therefore are not repeated in this report.

During the July 2020 VSV, the IESC was informed that there were 22 confirmed COVID-19 cases amongst CBG employees, and all had recovered. In March 2021, the total number of known infections was recorded to be 63 of which 59 had fully recovered (back at work with no sign of 'Long COVID') and 4 remained active cases.

It is a mandatory requirement for contractors to report health and safety statistics, including COVID-19 infections, to the HSECQ Department. However, to date, no contractors have reported COVID-19 cases. The IESC is surprised by the zero incidence amongst contracted workers and, therefore, recommends that CBG confirms that zero infections amongst its contractors is correct and at the same time reiterates, to contractors, CBG's expectation for immediate reporting of any cases that occur.

Meetings with community members by the CR team continue, however CBG has adjusted its long-term strategy to minimise risks of COVID transmission. Thus, meetings with community representatives do continue, although additional safety measures are respected including use of masks, social distancing and reduced number of participants during meetings.

### 6.3 Employment and employees

Since the July 2020 monitoring site visit, the following key documents have been finalized (by mid Q1 2021):

- Human Resources (HR) Manual;
- Workers' Grievance Mechanism (WGM); and
- Code of Ethics and Business Conduct (the Code of Ethics).

The HR Manual and WGM are the responsibility of the Human Resources Department and the Code is the responsibility of CBG's Compliance Function. The Code of Ethics complements the other two documents as it sets compliance expectations/behaviours to be practised by CBG employees and, also, presents a 'whistle-blowing' procedure (*système de lanceur d'alerte*) whereby employees can report actions that are considered to be breaches of the Code.

The CBG-wide WGM has been in operation since the end of January 2021 (previously there was a WGM which was introduced for contractors, specifically those working on the MUOA project, and which formed a basis for the CBG-wide WGM). As of 9 March 2021, only a very few grievances were submitted. A register containing both worker grievances and issues reported to the Compliance Function is maintained.

As required by the WGM, grievance boxes have been installed in CBG buildings, usually placed in toilets, in Sangarédi, Kamsar and Conakry. There are 13 boxes, most located in Kamsar. The Compliance Function (one staff member), based in Kamsar, is responsible for collecting the grievances. The boxes are emptied regularly and, in line with a Lender request, CBG intends to try to empty them monthly. Currently, however, due to COVID-19 travel restrictions, collection of grievances (on a relatively frequent basis) from Sangarédi and Conakry is challenging. Figures 6-2 and 6-3 show grievance boxes *in situ* in Sangarédi and in Kamsar.





**Figure 6-2: Sangarédi: Grievance Boxes**



**Figure 6-3: Kamsar: Grievance Boxes**

Under the Contractor Management Plan and, to a more limited extent, the Local Content Plan, certain CBG LWC requirements apply to contractors (and sub-contractors) and, to a more limited extent, to suppliers (see also Section 6.4). Actions have been taken to disseminate the HR Manual, WGM and the Code to employees and contractors, but dissemination is not complete. For example, The Code has been disseminated to employees by intranet announcement and by email. Soon, the Code will be uploaded to the Extranet and contractors/supplier will be alerted by email (the database of contractor /supplier details is being updated first). (*Post-VSV Note:* CBG confirmed that the Code is now available on the Extranet). The HR Manual and the WGM have been announced and presentations made to the Trade Unions, but not yet disseminated to all employees and contractors. It is recommended that dissemination to employees and contractors is completed as soon as possible for all three documents accompanied by familiarization sessions during inductions supported by posters and other material introducing and explaining the WGM.

In recent previous IESC monitoring reports, the issue of demobilization of workers has been discussed. For the Phase 1 Expansion Project, CBG relied on the EPCM (Fluor) to manage demobilization. There was no formal process for oversight or auditing of Fluor’s performance or

the actions 'on the ground' during demobilization. In the July 2020 monitoring report, it was recommended that CBG adopt a formal demobilization procedure based upon preparation and implementation of demobilization plans. Early in 2021, the Contractor Management Plan was amended to include a requirement for demobilization plans to be utilized. Responsibility for preparing/implementing demobilization plans is flexible with both CBG and/or an EPCM (or similar) being responsible depending on the circumstances. The procedure revolves around demobilization plans with monitoring and auditing of plan implementation.

During the VSV, there was a meeting with a representative of the National Confederation of the Guinean Workers to discuss selected LWC topics from a trade union perspective. The representative was recruited in 2010, is based in Kamsar and works as a mechanic. His union is the biggest 'CBG' union with 70 % of all employees being members. There is another smaller union. All employees (excluding senior managers) are union members.

The Collective Bargaining Agreement (*Convention Collective*) is negotiated annually and usually the focus of negotiations is on the same two key topics: working conditions and salaries. The most recent negotiations were no different and no 'new' topics or issues of concern were raised. The union representative was satisfied with the outcome of the negotiations.

The representative confirmed that the National Confederation of the Guinean Workers was involved in the preparation of the WGM and that the Union was content with the WGM. He stated that some workers prefer to raise grievances via the Union and not directly to CBG. In such cases the Union passes them to CBG. There is a 'joint' HR department/Unions committee that meets to discuss and resolve worker grievances. The last work stoppage at CBG occurred in 2011. He added that CBG, despite some problems, is regarded by many in Guinea as a 'reference' company which sets a standard for other Guinean companies to achieve.

Over the past few years, most key improvements to working conditions were in the realm of health and safety, especially dust levels in the workplace. He also highlighted CBG's efforts to promote local economic development via the TPE programme (which had been copied by other companies), beneficial changes in community relations and promotion of environmental improvements.

#### **6.4 LWC issues in contractor management**

CBG requires its contractors and suppliers to comply with its LWC requirements (essentially ensuring compliance with PS2). In this section, only contractor/sub-contractor management is discussed. Management of suppliers will be considered in a future site visit.

There are two E&S Plans (Contractor Management Plan and the Local Content Plan) which together provide the mechanism for ensuring that LWC requirements are:

- Considered in the bid evaluation and contractor selection process; and
- Integrated into CBG oversights of contractor performance via monitoring and auditing activities.

During the March 2021 site visit, emphasis was placed upon the application of the two Plans to i) the bid evaluation and contractor selection process and ii) general contractor management following engagement by CBG. The specific issue of contractor supervision via a regular monitoring/auditing procedure will be investigated in more detail during the next site visit.

Regarding the bidding process, the HSECQ department is drafting a 'Minimum Requirements' (also referred to a 'Simplified Requirements') document to supplement current HSECQ documents appended to RfPs, that are sent to potential contractors invited to submit a bid. The 'Minimum Requirements' will be accompanied by key documents such as E&S Plans and LWC procedural documents.

The Contract Management Plan requires that all EPCM contracts include HSECQ requirements. These HSECQ requirements include LWC implementation. An EPCM is responsible for selection of sub-contractors and, therefore, cascades the HSECQ requirements to the sub-contractors. Further, the Contractor Management Plan requires that CBG must verify all contractors' abilities/capability to meet LWC requirements. Also, during the contract period there should be a minimum of three 'checks' per year of contractors and sub-contractors on-site. As necessary, corrective actions will be required and close out of the actions achieved.

The Local Content Plan requires input from the Procurement and Logistics Director to ensure that the HSECQ requirements include LWC requirements and, also, specifies that the Procurement and Logistics Director is responsible for ensuring that contractors supply data on recruitment, employment and local content procurement to CBG, on a quarterly basis.

During the March 2021 site visit and in a meeting with senior personnel from the HSECQ and Procurement and Logistics departments, it became clear that the role of the Local Content Plan (and its requirements), in terms of managing selection of contractors and their data reporting performance, was unfamiliar to the participants. Having two Plans imposing labour and working conditions requirements appears, to date, not to be an effective mechanism in terms of co-ordination and, therefore, efficiency.

There is another, perhaps more fundamental, issue. LWC requirements are the responsibility of the HR Department (and to a lesser extent the Compliance Function); they are not within the remit the HSECQ and Procurement and Logistics. Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that PS2 requirements are:

- Considered in the bid evaluations and contractor selection process, especially structured participation in the Evaluation Committee;
- Presented in future reviews and potential changes to the 'Minimum Requirements' (and therefore included with RfPs); and
- Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.

Given the situation outlined above, the IESC recommends that:

- The bid evaluation process to be amended so that the HR Department receives all bids in advance of Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee' decision/s;
- HR department to designate senior staff member to receive PS2 training to assist it fulfil its role in the contractor selection process. and subsequent contractor management (latter issue to be examined in the next IESC site visit in Q3 2021);
- All requirements to be placed on contractors to be consolidated into the Contractor Management Plan (rather than be presented in multiple documents) at the next review and revision of the Plan; and
- The HR Manual, WGM and Code of Ethics to be provided in all RfPs.

*Post-VSV Note: CBG has confirmed that it is reviewing the bid evaluation process and intends to include LWC requirements in the revised process in line with the IESC's recommendations.*

**Table 6-2: Summary of Findings, PS2**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2021_020	Reporting of COVID-19 cases	To date, surprisingly, no contractors have reported COVID-19 cases despite mandatory reporting of cases to CBG being required.	All	CBG to confirm that zero infections among contracted workers is correct and at the same time reiterate, to contractors, CBG's expectation for immediate reporting of any cases that occur.	<b>NA</b>
March 2021_021	Dissemination of the HR Manual, WGM and Code of Ethics	Actions have been taken to disseminate these three documents to employees and contractors, but dissemination is not complete.	All	Dissemination to employees and contractors to be completed as soon as possible accompanied by familiarization sessions during inductions supported by posters and other material introducing and explaining the WGM.	<b>Moderate</b>
March 2021_022	Integration of LWC requirements in bid evaluation and contractor management	Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are: <ul style="list-style-type: none"> <li>• Considered in the bid evaluations and contractor selection process, especially structured participation in the Evaluation Committee;</li> <li>• Presented in future reviews and potential changes to the 'Minimum Requirements' (and therefore included with RfPs); and</li> <li>• Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.</li> </ul>	All	CBG to ensure that: <ul style="list-style-type: none"> <li>• The bid evaluation process is amended so that the HR Department receives all bids in advance of Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee's decision/s;</li> <li>• HR Department to designate a senior staff member to receive PS2 training to assist it fulfil its role in both the contractor selection process and subsequent contractor management (latter issue to be examined in the next IESC site visit);</li> <li>• All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan (with removal of LWC provisions from the Local Content Plan); and</li> <li>• The HR Manual, WGM and Code of Ethics to be provided in all RfPs.</li> </ul>	<b>High</b>

## 7. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

### 7.1 Implementation of environmental management plans

CBG's progress in the implementation of various environmental management plans and, specifically, action plans embedded within the management plans, is described in this section. The following plans are considered: environmental monitoring, air quality, water quality, noise and vibration, resource use and energy efficiency, waste management, and hazardous materials management.

As a general observation, the implementation of actions specified in the action plans (dated January 2019) are behind schedule. The IESC acknowledges that several mitigating circumstances, including COVID-19 travel restrictions and the resignation of the EMTL in January 2020, have acted to reduce CBG's capacity to implement many actions.

At the time of reporting certain constraints remain, for example, COVID-19 travel restrictions; however, CBG has been developing its practices in light of the ongoing pandemic to ensure progress does not stop. In addition, a new EMTL was appointed in December 2020. These two developments are resulting in significant progress; however, it is recognised that a backlog of tasks has developed through 2020 and it will take time for the EMTL to address this backlog.

### 7.2 Environmental Monitoring

#### 7.2.1 Environmental Monitoring Programme

CBG conducts environmental monitoring in accordance with its Environmental Monitoring Programme (EMoP) (D390-MOT-PLN-0033 EN v00 Rev002). The EMoP was revised in 2020 to take account of additional sampling requirements relating to the MUOA Project and provision of drinking water at the new Hamdallaye village site (see Section 7.4.5).

Further revisions are envisaged; however, these are not planned until late 2021. The IESC does not object to the revision of sampling programmes, and indeed supports periodic review in recognition of the changing nature of the Project (new plateaux, affected communities etc.). However, any reduction in the sampling programme and/or parameters analysed must be justified by the results of previous sampling campaigns.

The development/procurement of a database for collation of environmental monitoring data remains a priority for the new EMTL.

#### 7.2.2 Analysis of samples

In previous IESC monitoring reports, CBG's intention to increase internal laboratory capacity and thereby reduce reliance on external laboratories has been reported. Limited progress has been made in this respect and CBG's position has since reverted to the use of external certified laboratories with existing analytical capabilities that will meet CBG's needs. The IESC does not have a strong preference for either option, although does note external laboratories offer a greater degree of independence and therefore results from external laboratories are more defensible.

The IESC also reported previously that a contract with a Canadian laboratory had expired without renewal. Consequently, CBG has now been unable to send samples (primarily water and air samples) for external analysis for the entirety of 2020. During the VSV, the IESC was informed that discussions are currently underway with several external certified laboratories outside

Guinea<sup>26</sup> but within Africa. CBG expects to despatch a call for tenders in Q2, 2021. In the interim, local/CBG laboratories will continue to undertake simple water quality and air analyses for those samples with a short shelf-life or requiring *in-situ* measurement. The reasons for the delayed selection of an external laboratory have been explained in previous IESC monitoring reports; however, regardless of the difficulties experienced, the extended duration of restricted analytical capacity is a significant issue requiring immediate attention. CBG is fully aware of the importance of this issue and also views it as a priority item. CBG anticipates resumption of the full environmental monitoring programme in May 2021. Other key priorities for 2021 include:

- Selection and implementation of a new database for all environmental monitoring data;
- Refresher training/training for the current team and a new field member to be recruited is considered necessary by the EMTL; and
- Full review and revision of the EMoP, informed by robust monitoring data, by the end 2021.

### 7.2.3 Static air quality monitoring station in Kamsar

The static air quality monitoring station in Kamsar remains inoperable. CBG has experienced difficulties in securing technicians to repair/maintain the equipment, in part due to COVID-19 and also logistical issues given the location of technicians based in Australia. The address this issue, alternative service providers have been identified in Africa. Whereas logistical and COVID issues are not fully overcome, CBG does expect a technician will travel to site in the coming months and generation of real-time data by the air quality monitoring station will resume in Q2/Q3 2021.

### 7.2.4 Disclosure of monitoring results

CBG's EMTL understands the requirement to disclose environmental monitoring data to affected communities, and good progress is being made in this respect for noise and vibration (see below). The IESC recommends close interaction between the EMTL and the CR team to formalise its plans to improve disclosure of monitoring results. Such reporting of results must be consistent with the commitments made in the Stakeholder Engagement Plan as described in the IESC's July 2020 monitoring report.

## 7.3 Air Quality

### 7.3.1 Finalisation of the Air Quality Management Plan

An Air Quality Management Plan (AQMP) was prepared in January 2019, however the plan did not specify stack emission criteria for the dryer stack<sup>27</sup> in Kamsar. An agreement was made between CBG and Policy Lenders to revise the AQMP based on stack emission limits that will be derived and then agreed with the Policy Lenders, noting that EHS General and Industry Sector Guidelines do not provide in-stack emissions limits that can be applied readily to bauxite dryers. It was therefore agreed that feasible limits were to be based on measured stack emission data, including data for the new dryer (Dryer 4<sup>28</sup>), and refined ambient air quality predictions validated by empirical ambient air quality data where possible. Responsibility for revision of the AQMP rests with the EMTL.

Performance testing of Dryer 4 in late 2019/early 2020 revealed it could not operate at the original throughput design level of 1500tph. Modifications subsequently made in early 2020 improved the throughput, although this remained well below the design specification at 900tpa.

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<sup>26</sup> Following further investigations, the EMTL has concluded that Guinea does not have sufficient laboratory capabilities to meet CBG's needs.

<sup>27</sup> A single stack is used by the existing three dryers

<sup>28</sup> Dryer 4, also required to dry bauxite prior to export, is a part of the Expansion Project that is yet to be fully commissioned.

As indicated in Section 3.1, at the time of the virtual site visit, two additional modifications were underway:

- Increasing the lifting capacity in the dryer (now completed); and
- Increasing the motor torque by adjusting the electrical current on the Variable Frequency Drive (VFD).

Adjustment of the motor torque was completed by the end of April. Performance testing will occur during the rainy season, with testing expected to commence in August/September when the Dryer will be used at full capacity. The actual throughput will only be confirmed following performance testing in the wet season.

### 7.3.2 Stack emissions testing

Stack emissions testing of the operational dryer stacks (1-3) was conducted in 2019, however, as described in the previous IESC monitoring report, the data gathered from earlier sampling campaigns was not sufficient to inform and finalise the AQMP. CBG decided to undertake additional stack emissions testing, although this was delayed in 2020 largely because of COVID-19 travel restrictions. Despite the delays, CBG's sampling programme remains largely unchanged with dry and wet seasons now scheduled for May and then July/August 2021 respectively. Whereas Dryer 4 was originally to be excluded from the dry season campaign, the delayed sampling campaigns now allow for the inclusion of Dryer 4 in both dry and wet season sampling.

CBG anticipates completion of the AQMP by November 2021. This timeframe is required to allow for any minor slippage in the sampling dates, transportation and analysis of samples, data interpretation, modelling and revision of the AQMP and is considered realistic by the IESC. The current version of the Environmental and Social Action plan (ESAP) envisages finalisation of the AQMP in July 2021 and will therefore need to be revised to accommodate the November date. Discussion to revise the Final AQMP deliverable date are ongoing with Lenders at the time of reporting.

### 7.3.3 Air quality monitoring data

CBG's air quality monitoring programme is implemented under the EMoP and refers to the use of a combination of static and mobile monitoring devices. In its July 2020 monitoring report, the IESC described CBG's air quality monitoring as falling short of the monitoring detailed in the EMoP as a result of faulty sampling equipment (see Section 7.2.3) and termination of an agreement with a certified laboratory (see section 7.2.2). In March 2021 the situation remains largely unchanged, and data largely limited to particulates.

CBG is however in the process of purchasing additional monitoring equipment for in-house use including: i) portable dust analysers (Aeroqual PQ2000); ii) mobile gas and particulate analysers for real time results; and iii) installation of dust fall-out devices.

### 7.3.4 Status of AQMP implementation

The current AQMP (dated January 2019) includes a detailed action plan with discrete actions. CBG reported all actions have either commenced or been completed. This compares favourably to July 2020 when 6 actions had not started.

### 7.3.5 Dust Suppression

In 2020, in addition to traditional wetting of road surfaces, CBG is undertaking preliminary tests to find techniques that can reduce dust levels during blasting, including consideration of packing

material (stemming design) around explosives and blasting timing that coincides with the optimum daily meteorological conditions. In 2021, CBG intends to look at other dust control techniques, including use of chemical suppressants (rather than water alone) and has procured a bitumen emulsion dust suppressant for trials<sup>29</sup>.

#### 7.3.6 Low sulphur fuel

The current AQMP includes use of low sulphur fuel (<1%), for use in generators, boilers, dryers as a mitigation measure to reduce emission of SO<sub>2</sub>. Verification of the procurement of low sulphur fuel was sought during the VSV and the IESC can confirm the purchase of low sulphur fuel based on receipt of a fuel specification certificate<sup>30</sup> accompanying a shipment of fuel.

#### 7.3.7 Other air quality control measures for 2021

Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the original Kamsar central powerhouse by 2020. The IESC has been informed this will now occur as a priority action in 2021.

### 7.4 Water Quality

This section provides an update on the implementation of the Water Management Plan (WMP), including status of priority actions described in previous IESC monitoring reports.

#### 7.4.1 Oil/water separator at tank farm

The IESC has previously reported oil concentrations that exceed Guinean (50ppm) and IFC (15ppm) limits in treated effluent from the main oil/water separator (a combination of two separators working in sequence) located at the tank farm in Kamsar.

In July 2020, CBG reported no engineered modifications had been made to the oil/water separator, but that reduction of oil at source combined with the cleaning of filters in the current system have been the main focus. These interventions resulted in a significant reduction in the 'oil-in-water' discharge concentrations with monitoring data from February to July 2020 showing oil-in-water concentrations to be typically fluctuating between the IFC and Guinean standards (15 to 50ppm). A primary reason cited by CBG is the enforcement of improved practices at the rail workshop in Kamsar where waste oil is now collected separately in a tank for disposal rather than washed into the drainage channel (by some employees against agreed practices) for subsequent treatment at the oil/water separator. However, despite this reduction in concentrations of oil discharged to the estuary, most samples remained above the IFC limit, and the need to find a permanent solution that would consistently achieve the oil in water discharge limits remained a priority.

As of March 2021, CBG reported a three-phase approach to achieve compliance as follows:

- Phase 1 (March to June 2021) – internal review of waste oil management practices and short-term technical solutions, for example, changing the band separators to improve oil recovery rates.
- Phase 2 (March to June 2021) – appoint an external consultancy to undertake a detailed audit by of the entire system, from the waste oil generating practices through to process engineering, with recommendations for technical improvements. Potential consultants have been identified to undertake the work and a call for tenders has been issued.

<sup>29</sup> Product name is Anionic Bitumen Emulsion (SS60). MSDS states practically non-toxic, LC/EC50>100mg/l, although should be kept away from watercourses.

<sup>30</sup> Certificate of Analysis, Ref. Greta K (9800374) specifies total sulphur content of 0.83 %wt.



- Phase 3 (June onwards) – design and implementation of technical improvements.

Whereas the approach above is logical, the IESC highlights that non-compliant discharge to the estuary has been ongoing for several years albeit with some improvement as a result of the HSEC team's earlier interventions. Furthermore, the timeframes specified in the approach above do not align with the ESAP (version agreed in Q4, 2020) which requires a permanent technical solution be in place by the end of June 2021.

Whereas engineering solutions have been presented in previous IESC monitoring reports, CBG's current EMTL explained that he does not have a sound holistic engineering solution, only suggestions and ideas for different technical solutions, and for that reason he does not wish to proceed without a full technical assessment able to generate credible results/recommendations.

The IESC supports CBG's plans to identify a permanent technological solution, however in the interim CBG must take immediate action to find a short-term solution to achieve the IFC discharge limits. A rapid intervention plan to achieve compliance in the shortest timeframes possible should be presented to Policy Lenders. Also, CBG to ensure that surfactants are not being used to clean oily areas – supported by refresher training and repeat inspections. The IESC further recommends CBG provide to the Policy lenders its monthly oil in water monitoring results for the treated effluent to demonstrate oil concentrations are compliant/short term actions are effective, noting that elimination of oil at source has been tried in the past and did not provide a permanent solution. Finally, the IESC recommends more frequent inspection of waste oil generating areas to ensure poor practices, including wash down of areas directly to drains and use of surfactants as a cleaning agent in such areas, are not reoccurring.

#### 7.4.2 Wastewater treatment at Sangarédi (Dounsey)

The IESC has reported, in successive monitoring reports, that CBG is aware of the need to maintain and upgrade the Sangarédi (Dounsey) wastewater treatment plant (WWTP), but also noted progress with the implementation of key actions set out in the Action Plan has been slow, in part due to COVID-19 travel restrictions. In March 2021, CBG reported progress in terms of recruitment of staff for maintenance of the WWTP, construction of a buildings to house the UV treatment unit and a mixing and dosing tank, plus construction of toilets. Whereas evidence was provided of ongoing works, important actions are yet to be completed. Such actions include installation of the UV treatment plant, considered necessary to achieve standards for faecal coliforms in the treated effluent discharge. Foundations for the UV treatment plant are under construction (Figure 7-1) and the plant is current being stored at CBG's Kamsar facilities, but nevertheless is yet to be installed almost 2 years after the original planned installation date. The IESC has been informed that the UV plant is expected to be installed in Q2, 2021 and CBG does not envisage any problems with the current schedule.



**Figure 7-1: Foundations for the UV Wastewater treatment in Sangarédi**

Another key action in the WMP, highlighted by the IESC in previous reports, is the emptying the primary sludge tank at the WWTP, originally scheduled for Q2/Q3 2019. In the July 2020 monitoring report, this action was categorised as 'not started'. In March 2021, Terms of Reference had been prepared to analyse the sludge and in parallel a number of contractors have been identified to remove and dispose of the sludge in a manner to be informed by the analysis (toxicity) of the sludge. CBG does not anticipate the sludge to be toxic given the municipal nature of the wastewater.

CBG has highlighted the following WMP actions as priorities for 2021 as follows:

Sangarédi

- Upgrade of the WWTP at Sangarédi (Dounsey);
- Upgrade of the Drinking Water Treatment Plant at Sangarédi;
- Recalibration of the Hydro/Groundwater balance model; and
- Installation of additional piezometers; and

Kamsar

- Upgrade of the oil water separator;
- Review of Kamsar drainage system; and
- Implementation of a database for environmental monitoring data management.

Whereas the implementation of many actions in the WMP remain well behind schedule, the IESC recognises good progress, both in terms of planning (detailed surface water modelling) and execution of actions (cleaning of drainage system at Kamsar), has been made since the arrival of the EMTL in December 2020.

#### 7.4.3 Recalibration of water balance model

As part of its water management strategy, CBG developed a water balance model. One of the objectives of the model was to support CBG in its mine planning programme and, specifically, in predicting impacts on surface waters, groundwater and natural springs. CBG continues to be supported by the Canada-based consultancy, EEM, and in addition work is ongoing to update the model using groundwater data collected since the model's initial development (subject to CBG's consultant selection process). CBG's application of the recalibrated model, including its use in

developing LDPs (environmental constraint mapping) will be investigated during the IESC's next site visit.

#### 7.4.4 Bypass of the Kamsar WWTP

The WMP Action Plan includes specific actions relating to use of an untreated effluent bypass (or more specifically, an overflow from a collection tank in which sewage is stored before flowing to the WWTP) at the Kamsar WWTP. The bypass is intended for emergency conditions only but has reportedly been used in non-emergency situations. As per the Action Plan, the rationale for using the by-pass, and its use, should be confirmed and measures put in place to minimise its use in the future. Investigations into this issue, scheduled for Q1 to Q3 2020 in the Action Plan, have not occurred.

During the VSV, CBG reported the investigation into the use of the bypass is scheduled for 2021. IESC recommends that the investigative actions, are completed no later than end Q2, 2021. In the event investigations confirm the bypass has been used outside of emergency situations, the reasons should be determined, and corrective action implemented to minimise recurrences.

*Post-VSV note: At the time of issuing this report, the IESC has been informed by CBG that the bypass (more accurately described as an overflow) has been used when the sewage collection tank's capacity is exceeded. Corrective actions underway include: expansion of WWTP capacity; the installation of a level meter to register overflow events; the investigation of bypasses between rainwater and sewage collection systems at the city (noting the occurrence of overflow events during the rainy season suggests that rainwater might be entering the sewage system); and the feasibility of building an emergency storage pond.*

#### 7.4.5 Water quality monitoring (new Hamdallaye village)

In previous site visit reports the IESC has reviewed monitoring results provided in CBG's Annual Monitoring Report (see previous IESC monitoring report where the 2019 AMR was reviewed). However, at the time of writing this March 2021 report, CBG's 2020 AMR was not available. Closer examination of monitoring results for water (and other media) will be undertaken during the next site visit.

Water samples collected from newly-drilled drinking water wells in the new Hamdallaye village (as reported in CBG's quarterly borrowers' E&S certificate of Q4, 2020) indicated the presence of faecal coliforms. Subsequent monitoring by CBG in February 2021 has shown zero coliforms, although at the time of reporting, the results are currently undergoing a quality assurance check. Whereas the initial positive result was of concern, it was also an unexpected result, and it remains unclear whether the results were accurate, an anomaly or a result of sample contamination. The IESC understands monthly samples will be collected in the future, and the results from the analyses of the monthly samples will be reviewed by the IESC in order to identify any recurrence coliforms.

### 7.5 Noise and Vibration

The Noise and Vibration Management Plan (NVMP) has been updated to include 6 additional actions relating to the MUOA Project. Of a total of 46 actions listed in the N&V Action Plan, 7 are categorised as completed, 35 are ongoing and 4 are yet to start. This equates to the start of 9 actions since July 2020.

#### 7.5.1 Noise and vibration monitoring

The IESC previously reported on constraints faced by the CBG monitoring team due to lack of available noise and vibration (N&V) monitoring equipment. CBG confirmed the N&V equipment has been sent for maintenance and repair; however, there are still some equipment constraints

that are slowing/reducing the amount of monitoring conducted. Two new sound meters have been ordered and are reportedly expected to arrive in the near future, allowing the monitoring effort to ramp up and for the continuation of monitoring during any future equipment repairs.

The IESC was informed by CBG that recent N&V monitoring has been centred around mining activity and in particular blasting events on the plateaux. Measurements are disclosed to affected communities via the CR team as summarised below

- Communities are informed of upcoming blasting prior to actual blasting;
- N&V levels are recorded during blast events;
- Results disclosed to the community during a meeting with CR personnel; and
- Minutes of meetings are signed by participating community members.

CBG has reported that N&V levels recorded in villages remain below agreed limits.

#### 7.5.2 Noise and Vibration minimisation

Surface miners are an established mitigation measure, referenced in the NVMP, and used in place of blasting to avoid noise impacts where ore is to be mined in proximity of sensitive receptors, as defined in LDPs. CBG operates a single surface miner which has been reported previously to be broken down, effectively preventing mining within noise (blasting) buffer zones. At the time of the March 2021 VSV, CBG's surface miner was again reported to be not working. CBG informed the IESC that the procurement of 2 new surface miners has been approved with delivery expected in the coming months. The IESC recommends that Lenders are informed when the surface miners are received, and in the interim, buffer zones defined within LDPs must continue to be respected.

#### 7.5.3 MUOA Project

A key issue raised previously by the IESC relates to the impacts to rural communities resulting from the progressive increase in train movements associated with the MUOA Project. More specifically, studies<sup>31</sup> commissioned by CBG identified the potential that noise levels in rural areas (where the trains will travel at their fastest) will exceed applicable standards due to the increased frequency and length of trains. The NVMP acknowledges the potential for noise exceedance and states mitigation measures will be put in place should monitoring results indicate noise exceedances, however the precise nature of these mitigation measures remains undefined.

As indicated in the NVMP, CBG has specified three additional N&V monitoring points for the MUOA Project including one that will be representative of rural areas. Measurements will be taken 50m from the edge of the rail corridor, believed to be the distance of the nearest rural receptors, however to date, measurements have not been routinely taken along the corridor (due in part to the equipment constraints referenced above).

The IESC recommends the following actions are completed:

- Confirmation of the location of sensitive rural receptors and distances from the railway line;
- Establishment of a robust baseline N&V data set (before train numbers increase significantly); and
- Identification of site-specific feasible mitigation measures in the event they should be needed i.e. availability of space and attitude of potentially affected parties to barriers/other measures). Measures are likely to be limited to installation of noise barriers and as such, the

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<sup>31</sup> Acoustic Impact Study of the Multi-user Guinea Rail Project, Ref 046-P-0014614-0-01-003-BV-R-0100-01, June 2020

feasibility investigations will need the involvement of the CR team in community consultations.

## 7.6 Waste management

In general, slow progress was made in 2020, with 8 more tasks started and 5 tasks completed since the VSV in July 2020 (See section 5.4.2). Significant completed actions primarily relate to construction at Tora Bora. The sections below address key aspects of CBG's Waste Management Plan, by site.

### 7.6.1 Kamsar

#### *Tora Bora*

Construction of the Tora Bora waste management facility (WMF) remains ongoing although limited progress has been made since the previous VSV. The IESC notes that the design of waste cell is near complete, site conditioning is in progress and the second incinerator, previously reported to be not working, was reported as being fully operational at the time of the VSV.

CBG also informed that the life of the Tora Bora is 5 years with a permit in place for this duration i.e. it is a short-term solution with the site scheduled for decommissioning after 5 years. The 5-year life span/permit is contrary to the IESC's earlier understanding of the operational life of the Tora Bora facility and therefore prompts the needs for a longer-term (post 5 year) solution. CBG is currently exploring options for a longer-term solution, including the re-use of the Bendougou municipal landfill site or an alternative site and/or a shared facility with other mining operators. CBG has initiated discussions with other operators to explore the possibility of a shared facility.

#### *Bendougou*

The IESC had already reported in its July 2020 monitoring report that CBG was planning to restart its use of the municipal facility at Bendougou. During the current VSV, CBG confirmed this remains its intention; the IESC therefore reiterates earlier recommendations that the CR team engages with the affected community members prior to any recommencement of such activity, in recognition that communities along the waste transportation route to the Bendougou landfill have protested against the movement of CBG's waste trucks in the past, taking direct action in the form of blockages.

The IESC notes that the Waste Management Plan, dated January 2019, does not recognise CBG's longer-term strategy to deal with waste generated in the Kamsar area. Thus, consistent with the two year review cycle specified in most Environmental Management Plans, the Waste Management Plan should be updated to reflect CBG's current waste management strategy, including the potential use of Bendougou facility and the longer-term strategy following end of Tora Bora design life.

#### *Temporary waste storage (Kamsar)*

The temporary waste storage area located close to the secondary crusher remains in use; however, waste volumes have been being steadily reduced through recycling and/or transfer to other WMFs such as Tora Bora (Figure 7-2). The IESC has previously reported large volumes of temporarily stored oil contaminated materials, following an oil spill from an old oil water separator. Most of this contaminated soil has been transferred to Tora Bora for bioremediation during dry season(s). To date, the bioremediation process remains ongoing, and no soil has been fully remediated as ready for re-use. The IESC has been informed by CBG that remediated soil will be sampled to ensure it is contamination free before being re-used.



**Figure 7-2: Progress with the removal of waste from temporary storage areas**

7.6.2 Sangarédi

CBG’s Waste Management Plan allows for a significant upgrade of the landfill at Sangarédi, in effect, a duplication of the facilities at Tora Bora. At the time of the March 2021 VSV, fencing was being erected and a security presence remained in place to discourage scavenging/potential injury to community members, but in general little physical progress had been made since the previous VSV.

As previously stated, the lack of an EMTL in 2020 has hindered progress, but with the recent appointment of an EMTL, the IESC believes the rate of progress will accelerate. Figure 7-3 shows CBG’s current priorities for 2021. The IESC was informed by CBG that the design for the Sangarédi WMF is near complete and the bidding process for contractors is due to start in Q2, 2021.

**Objectives 2021**

Project	Ref. Action Plan Item	Actions	2021													
			Q1			Q2			Q3			Q4				
			January	February	March	April	May	June	July	August	September	October	November	December		
Torabora WaMF Construction	1.1.6	Build the facilities (electricity, lights, concrete slabs (2), fences, signage, etc.)	●	●	●	●	●	●								
Sangarédi WaMF Construction	3.1.4	Estimate costs (site, fence, containers, incinerator (1))				●	●	●								
	3.1.9	Build the facilities (electricity, lights, concrete slabs (2), fences, signage, etc.)				●	●	●	●							
	3.1.10	Install incinerator (1)							●	●	●	●	●	●	●	●
Sangarédi WaMF Construction	3.1.11	Install marine containers for the storage of residual hazardous materials				●	●	●	●	●	●	●	●	●	●	●
	Performance indicators	3.6.4	Train the personnel (employees and contractors) of Sangarédi operations on waste management	●	●	●	●									

**Figure 7-3: Key waste management actions for 2021**

7.6.3 Water quality monitoring boreholes

As part of a wider water quality monitoring campaign, 4 new monitoring boreholes are due to be installed within the next two months. The 4 boreholes at Tora Bora are intended to replace the 4 previous boreholes that were destroyed during MUOA construction. Similarly, 4 monitoring boreholes will be drilled around the perimeter of the Sangarédi WMF.

## 7.7 Hazardous Materials

Progress has been made since July 2020, with 9 more actions completed, notably in relation to the management of explosives. Other notable progress includes: the development of a hazardous materials (hazmat) register (previously incomplete); asbestos surveys undertaken by CBG's engineering department that confirmed no asbestos to be present at CBG's facilities; and the georeferencing (using the GIS system) of all hazmats. However, overall progress remains behind the original schedule.

In 2021, CBG has several priority areas. The first of these, to be undertaken in Q2, 2021, concerns improved process for the selection and procurement of chemicals. This will involve the development of a procedure that integrates the HSECQ Department in the procurement of chemicals, regardless of whether procurement is by CBG or its contractors. Using the new process, which involves the sharing of purchase orders with the HSECQ Department, the HSECQ team will then be able to record all hazmats in the register and subsequently maintain an inventory. Other priority focus areas for 2021 relate to: transportation of hazmats (training, procedures, audit programme); and the development of comprehensive hazmat manual with specific procedures per site (due by end 2021).

Monthly inspections are carried out to ensure the chemicals stored at CBG facilities are aligned with the hazmat register. Such monthly inspections also allow an opportunity to ensure banned substances are not present.

### 7.7.1 Lightning rods

CBG currently has several radioactive lightning rods used to protect structures from lightning strikes. The use of radioactive (Ra-226) rods, which was thought increase electrical conductivity and thus performance of lightning rods, was common practice through to the late 1980s, but has since been banned in many countries because of the potential health effects associated with damaged rods. CBG identified the risk associated with the installation of such rods and the need to manage the risk with several actions specified in the hazmat action plan. The action plan, for example, includes action 4.18, "*Lightning rod management program - Ensure that a programme is in place to ensure the appropriate decommissioning, storage and disposal of radioactive lightning rods*" scheduled to be completed by end 2020. At present, lightning rods are identified (georeferenced) and located in safe areas. However, in the longer term a disposal solution needs to be identified, that ensures safe disposal and, also, avoids the risk of the rods being stolen/recycled.

## 7.8 Resource Use and Energy Efficiency

The Resource Use and Energy Efficiency Management Plan (RUEEMP) is primarily focused on: i) reducing water use; ii) reducing energy consumption; and iii) reducing GHG emissions. In the previous VSV monitoring report the IESC made several observations and recommendations associated with these three objectives.

### 7.8.1 Water use

A priority action was the installation of water meters which had been procured and were awaiting installation in July 2020, thereby allowing subsequent monitoring and informed (measured) reductions in water usage. CBG has informed the IESC that installation remains in-progress.

In addition to prioritising the procurement and installation of flow meters, in July 2020 CBG was also seeking to undertake urgent maintenance of the water distribution system, including the identification and removal of illegal offtakes in communities in proximity of Boké city, where illegal offtakes cannot be managed or measured. The IESC raised a concern over the potential to provoke and adverse community response, especially where security guards may be required to

stop illegal offtake. In this VSV, CBG was able to confirm such offtakes have been identified and dismantled without adverse community incident.

The IESC also reported on CBG's intention to establish a Water (and Energy) Management Committee that would include an HSECQ representative, thereby establishing a forum to progress water use/conservation initiatives. In March 2021, CBG confirmed the Committee was in place and is currently considering re-use of treated sewage effluent from the Sangaredi WWTP in the wetting of roads for dust suppression purposes.

Other actions completed include repair of water storage tanks that had minor leaks.

### 7.8.2 Energy use and GHG emissions

In the July 2020 monitoring report, the IESC made several recommendations including, in addition to a general recommendation to accelerate implementation of the RUEEMP Action Plan, the following:

1. Agree internally on a methodology for calculation of GHG emissions consistent with the need for an internationally recognised methodology;
2. Ensure GHG emissions, calculated using a robust methodology that can be repeated year-on-year, are reported in the 2020 AMR; and
3. Commission the services of an external energy efficiency consultant to undertake an audit of energy use. This approach is consistent with the objectives of the RUEEMP and would 'fast track' the identification of energy (and cost) savings/reduction in GHG emissions.

CBG has finalised its methodology for reporting GHG emissions and used this methodology to calculate 2019 emissions. CBG is reportedly on track to report 2020 GHG emission in the forthcoming Annual Monitoring Report due in late April 2021.

CBG has not commissioned an independent energy audit, however it has undertaken initiatives to reduce energy use, including for example, installation of timers on air conditioning units to prevent unnecessary cooling in office buildings when not in use. Other actions underway include:

- Review of fuel management procedures; largely intended to increase vigilance and reduce fuel theft; and
- Initiatives to reduce fuel usage as follows
  - Optimised use of equipment and prevention of idling engines; and
  - Good maintenance of engines to reduce exhaust emissions.

The IESC is also aware of other laudable examples of actions to enhance energy efficiency/reduce GHG emissions via use of more modern equipment. For example, the use of a more efficient dredger during the 2020 dredging campaign resulted in significant financial savings and reduced fuel usage<sup>32</sup>.

This example demonstrates the resource efficiency opportunities are available to CBG when procuring services. The IESC recommends that opportunities for fuel efficiency/reductions in GHG emissions are made an integral part of the CBG procurement process, via the forthcoming HSECQ 'Minimum Requirements', that should require potential contractors to consider fuel efficiency/ GHG emissions reductions. Any reductions specified by bidders should then be taken into consideration by the HSECQ team during the bid evaluation process.

<sup>32</sup> In 2020 the fuel consumed by a new dredger equated to 0.23 litres/m<sup>3</sup> of dredged material. Fuel use in previous years using older dredgers equated to 0.51 litres/m<sup>3</sup> of more. Ref. Maintenance Dredging Works of the Entrance Channel and Berthing Area at the Port of Kamsar, Republic of Guinea Campaign 2020 – FINAL REPORT, Sept 2020. Dredging International Services.



**Table 7-1: Summary of Findings, PS3**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2021_023	Environmental Monitoring Programme – external laboratory	The termination of a contract with an external laboratory, and the need to find a replacement laboratory, was reported previously. CBG has not been able to send environmental samples to external laboratories for well over a year, significantly effecting the quality of its monitoring data.	As reported previously, contracts with external certified laboratories should be secured as a priority to enable CBG’s resumption of the full suite of analysis specified in its Environmental Monitoring Programme.	<b>High</b>
March 2021_024	Environmental monitoring – disclosure of results	Disclosure of environmental monitoring data to affected communities is occurring in some instances, such as noise and vibration in mining areas, but remains inconsistent across CBG’s broader activities.	Close interaction between the EMTL and the Community Relations team is required to identify disclosure priorities and improve disclosure of monitoring results. Such reporting of results must be consistent with the commitments made in the Stakeholder Engagement Plan as described in the IESC’s July 2020 monitoring report.	<b>Moderate</b>
March 2021_025	Water quality - Oil/water separator	As previously reported, oil concentrations in treated effluent leaving the oil water separator located adjacent to the tank farm in Kamsar continue to consistently exceed applicable IFC standard.	A rapid intervention plan to achieve compliance in the shortest timeframes possible should be presented to Policy Lenders and the IESC. In addition, CBG shall: <ul style="list-style-type: none"> <li>provide its monthly oil in water monitoring results for the treated effluent to lenders in order to demonstrate short term actions are effective</li> <li>increase the frequency of inspections of waste oil generating activities to prevent poor practices from reoccurring.</li> </ul>	<b>High</b>
March 2021_026	Water Quality - Bypass of the Sangarédi WWTP	The WMP Action Plan includes specific actions relating to use of an untreated effluent bypass at the Sangarédi WWTP outside of emergency situations. Investigations scheduled for Q1 to Q3 2020 in the Action Plan have not occurred.	CBG to investigate the use of the bypass, no later than end Q2, 2021. In the event that use of the bypass persists outside of emergency situations, the reasons should be determined, and corrective action implemented to minimise any recurrences. <i>Post-VSV Note: investigation and corrective actions have commenced.</i>	<b>Minor</b>
March 2021_027	N&V impacts – rural areas	To date CBG has not specified feasible mitigation measures that could be implemented in the event	The IESC recommends the following actions are completed:	<b>High</b>

ID	Aspect	Issue Description	IESC Recommendation	Significance
	adjacent to railway	noise standards are exceeded following the increase in ore transported by rail. A final solution could involve resettlement of affected parties. CBG should ensure alternative mitigation measures are identified to avoid resettlement.	<ul style="list-style-type: none"> <li>Confirmation of the location of sensitive rural receptors and distances from the railway line;</li> <li>Establishment of a robust baseline N&amp;V data set (before train numbers further increase); and</li> <li>Identification of site-specific feasible mitigation measures in the event they should be needed i.e. availability of space and attitude of potentially affected parties to barriers/other measures). This is likely to be limited to installation of noise barriers and as such will need the involvement of the CR team in community consultations.</li> </ul>	
March 2021_028	Waste management	The Waste Management Plan dated January 2019 does not recognise CBG's longer-term strategy to deal with waste generated in Kamsar.	<p>The Waste Management Plan should be updated to reflect CBG's current waste management strategy, including the potential use of Bendougou facility and longer-term strategy following end of the Tora Bora waste facility's design life.</p> <p>The CR team to engage with the affected community members prior transportation of wastes to Bendougou.</p>	<b>Moderate</b>
March 2021_029	Hazardous materials management	Radioactive lightning rods are present on CBG facilities/stored in Sangarédi. These are prone to decay and damage over time and therefore need to be carefully managed. Currently the plan for ultimate dismantling and disposal of these radioactive sources is undefined.	A longer-term solution for the safe dismantling and disposal of radioactive lightning rods is required as per action 4.18 of the HAZMAT action plan. The Waste Management Plan will also require update to include the disposal route(s) for this waste.	<b>Minor</b>
March 2021_030	Energy efficiency/GHG emissions	A number of discrete initiatives have been put in place to reduce GHG emissions, however further opportunities are likely across CBG's operations.	The IESC recommends opportunities for fuel efficiency/reductions in GHG emissions are made an integral part of the CBG procurement process via the forthcoming HSECQ 'Minimum Requirements' revision. Contractors' intentions regarding fuel efficiency/reductions in GHG emissions should be taken into consideration by the HSECQ team during the bid evaluation process.	<b>Minor</b>

## 8. PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY, AND SECURITY

### 8.1 Introduction

CBG has developed Community Health and Safety Management Plan (CHSMP) and the status of implementation of this Plan was investigated during the VSV. Also, opportunities were taken to examine other topics (including some 'issues', raised previously in IESC monitoring reports), to assess their status now and into the near future.

In addition to CHSMP implementation, other topics considered are:

- Blasting Protocol;
- Communicable disease prevention;
- Health infrastructure;
- Rail and community health and safety (Transitional Measures Plan implementation); and
- The Rail Safety Management Plan.

### 8.2 Community Health and Safety Management Plan

The title of the Community Health and Safety Management Plan (CHSMP) has changed. Now, 'security' is no longer a component of the CHSMP in recognition that CBG has a separate Security Management Plan. However, aspects of security provision (such as behaviour of security personnel) that interact with local communities remains part of the CHSMP.

### 8.3 Blasting Protocol

In its monitoring report arising from the July 2020 site visit, the IESC described work underway to amend the Blasting Protocol<sup>33</sup>. The Protocol has reached the final draft stage and it is undergoing review by all concerned departments, including a review by the EMTL. The urgency of approving this protocol has been stressed at internal HSECQ meetings. Despite the lack of approval, the elements of the protocol, that involve communities, are being implemented 'on the ground'. This effort has been assisted by the 'secondment', to the CR team, of a staff member from Mining Operations (See Section 5.1.2). Despite, the 'on the ground' progress, the IESC is concerned that, eight months after being informed that the protocol was being amended, the IESC finds that it is not approved. It is recommended that all final stage reviews of the protocol are completed, as quickly as possible, with approval and full implementation following immediately.

### 8.4 Communicable disease prevention

#### 8.4.1 COVID-19

CBG continued work in the communities in relation to COVID-19, in H2 2020 and into 2021. However, the support of IFC Advisory ceased in Q3 2020. (See, also, Section 6.2.4).

Implementation of some of CBG's commitments, under the CHSMP, relies on contributions from doctors and other medical personnel. Medical personnel have moved from HSECQ to the HR Department; thus, introducing an extra layer of administration to be 'cleared' before their deployment for CHSMP reasons; however, this does not present a significant obstacle.

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<sup>33</sup> The Blasting Protocol establishes actions/responsibilities to manage blasting impacts and to reduce community health and safety risks.

#### 8.4.2 Malaria

As described in the July 2020 monitoring report, CBG decided to join forces with the Chamber of Mines and with GiZ<sup>34</sup> and participate in a joint anti-malaria programme. This programme was not implemented in 2020 due to COVID 19 restrictions. At the time of the site visit in March 2021, the programme had not started although actions are planned. CBG is waiting for the formal 'go ahead' from the Chamber of Mines. CBG is aware of the actions it will implement within the programme:

- Sensitization/prevention actions at the household level via community agents;
- Spraying houses with an insecticide and other structures where people congregate and, also, known breeding sites for mosquitoes;
- Distribution of mosquito nets in communities; and
- Contribution to the evaluation of the program.

In 2020, CBG distributed mosquito nets as follows:

- 7,302 mosquito nets distributed to 2,434 CBG employees; and
- 244 mosquito nets distributed to the community of Hamdallaye (one net per room)<sup>35</sup>.

Given that CBG put its anti-malaria program 'on hold' in 2020 (apart from its net distribution) and that is ready to implement its contribution to the joint anti-malaria program in 2021, it is disappointing that the 2021 program has not been initiated (due to circumstances beyond CBG's control). The IESC recommends that CBG continues to act to persuade and assist the Chamber of Mines to initiate the program as quickly as possible.

#### 8.4.3 Other diseases

As part of its community-focused work to reduce threats to community health and safety (within the context of both the CHSMP and the SEP), awareness-raising of threats to community health and safety will be undertaken by 25 'peer educators'. These educators are volunteer CBG employees who have received training from the Chamber of Mines.

CBG senior management has made an announcement to all employees on the Ebola outbreak in the N'zérékore area of southern Guinea (~700 km from Sangarédi). CBG has reviewed the risks arising from the outbreak and, at present, no specific Ebola-related measures are deemed to be necessary. The outbreak is relatively small and appears to be contained and, also, a vaccination programme has been initiated at the outbreak source. The situation is kept under review by senior management.

### 8.5 Health infrastructure

In 2020, as part of its community development work and in line with Local Development Plans, CBG undertook the following:

- Renovation of a health centre in Sangarédi; and
- Construction of a health centre in Kouramangui.

In addition, CBG provided 20 new boreholes and renovated three boreholes (some of these 23 boreholes were related to the MUOA project). All such boreholes may be expected to contribute positively to reducing community health risks by improving the quality of water supply to people if certain risk factors such as iron concentrations are controlled adequately. However, five new boreholes were in Kolaboui centre where they contribute to community health and safety in two ways. First, by provision of water with improved quality and, secondly, by reducing the number

<sup>34</sup> GiZ = Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (German Agency for International Co-operation)

<sup>35</sup> In addition to the 244 mosquito nets distributed by one of the contractors - CIG - that built the houses of the new village of Hamdallaye).

of people, primarily women and children, having to cross the railway line to obtain water. Fewer rail crossings reduce the risk of injury or death from an accident involving trains.

## **8.6 Rail and community health and safety**

### **8.6.1 MUOA Transitional Measures Plan**

The MUOA Transitional Measures Plan (TMP) contains a range of 'soft' and 'hard' measures. Key soft measures in place include 30 flagmen (hommes piquet) at pedestrian crossings in Kamsar and two people allocated to each set of points (aiguilles) along the entire railway (the second person is a 'back-up' in case the other person is unexpectedly unable to fulfil his/her duties). The latter measure is part of the temporary signalization and will continue until end of 2022.

The hard measures consist mainly of structures such as pedestrian or pedestrian/motorcycle bridges (to be referred hereafter, generically, footbridges or passerelles) and level crossings. CBG reports that almost all the locations and type of crossing have been accepted by local stakeholders, particularly communities and local government authorities. However, there are two cases where negotiations are continuing. Thirteen passerelles are to be constructed: nine in Kamsar (one of these to be constructed by GAC); two in Kolaboui and two in the vicinity of GAC operations near the railway, with installation starting in Kamsar then Kolaboui and being completed, at the GAC sites. Consultations with local stakeholder will occur at least two or three weeks prior to installation work beginning.

In the July 2020 monitoring report, the IESC states that installation of the passerelles would be completed by end September 2021. As indicated in section 3.2, the most recent MUOA implementation schedule shows an approximate five-month delay with completion not occurring until end February 2022<sup>36</sup>. Installation occurs sequentially, therefore some passerelles (as indicated above) will be completed before this date; nevertheless, their installation is still subject to delays. Installation delays are of concern as they extend the already elevated threat to community health and safety that has been in place since the original passerelles were removed to allow for the doubling of the line. The increased community health safety risks result not only from the delays, but also the increase in daily train movements (the increase in the number of movements is gradual, but nevertheless it is occurring and adds to the community risk profile). According to CFB, entity responsible for managing the rail infrastructure and its operations, the delay is due to a CBG procurement policy decision which was to give preference to local companies (a policy that is aligned with the Local Content Plan) instead of seeking one non-local company which might have enabled the passerelles to be fabricated/installed more quickly. Given this situation, the IESC recommends that CBG consider all options that could 'fast-track' fabrication and installation of passerelles, without compromising occupational health safety and the long-term integrity of the installed passerelles, and then implement the selected option/s.

### **8.6.2 Community incidents**

During the reporting period, one rail incident resulted in the death of a community member. The incident was reported to the Lenders in accordance with agreed protocols and a joint incident investigation concluded that the affected person had sadly committed suicide. Given the nature of the incident, the IESC concludes that the transitional measures described in Section 8.6.1 above would not have prevented the fatality.

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<sup>36</sup> At this stage of planning, CBG does not distinguish between completion of installation works and the opening of passerelles for public use.

## **8.7 The Rail Safety Management Plan**

The Rail Safety Management Plan is a component of the Road and Rail Safety Management Plan and is being amended to take account of the MUOA Project. The integration of the TMP 'soft' and 'hard' measures, into the Rail Safety Management Plan will be achieved, primarily, via amending the Action Plan. Work to update the MUOA- amended Plan/Action Plan is in progress and integration is expected to be completed by the end of April 2021 (date when the MUOA-amended Road and Rail Safety Management Plan is due to be finalized).

**Table 8-1: Summary of Findings, PS4**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2021_031	Blasting and community health and safety	In July 2020, the Blasting Protocol was reported to be undergoing amendment. In March 2021, eight months later, the Protocol is not yet approved.	Operations	All final-stage internal CBG reviews of the Blasting Protocol to be completed, as quickly as possible, with approval and full implementation following immediately.	<b>Moderate</b>
March 2021_032	Anti-malaria program implementation	Given that CBG put its anti-malaria program 'on hold' in 2020 and is ready to implement its contribution to the joint anti-malaria program, it is disappointing that the 2021 program has not been initiated, due to circumstances outside CBG's control.	All	CBG to continue to persuade and assist the Chamber of Mines to initiate the joint anti-malaria program as quickly as possible.	<b>Moderate</b>
March 2021_033	Community health and safety: Installation of bridges for pedestrians, bicycles and motorcycles (passerelles)	Since the July 2020 IESC site visit, the date for completion of the installation of the passerelles has been delayed by approximately 5 months. This delay is a concern as it extends the already elevated risk to community health and safety that resulted from the removal of the original passerelles.	Construction	CBG to consider all options that could 'fast-track' fabrication and installation of passerelles, without compromising occupational health safety and the long-term integrity of the installed passerelles, and then implement the selected option/s.	<b>High</b>

## 9. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

### 9.1 Hamdallaye and Fassaly Foutabhé RAP: Status, Assessment and Recommendations

#### 9.1.1 Hamdallaye

The previous VSV report mentioned that the move to the new site was complete and that only secondary work remained to be completed in regards of drainage, community infrastructure, and topsoil cover for gardening at the resettlement site itself.

It was found in the March 2021 visit that much of this work has been satisfactorily completed. Specifically, the school and the health centre are now operational, with staff already appointed. Drainage improvement is still on-going. Topsoil has been transported to the site to mitigate the poor characteristics of the soil, and most private household gardens next to dwellings were reported by CBG to be ready for cultivation. A schedule for full completion was presented and it is understood that all work will be finished before the 2021 rainy season starts. It is recommended that all outstanding works, particularly in relation to drainage, are completed before the beginning of the 2021 rainy season.

The 'repairs' satisfaction survey that was recommended following the July 2020 virtual site visit has not been implemented at this point. However, in line with the ESAP requirement (this recommendation was included into the MUOA ESAP, dated 2020), CBG will implement it in the coming few months.

#### 9.1.2 Fassaly Foutabhé

The school is completed; however, no teaching staff were appointed. CBG reported working with the relevant authority "*Inspection académique*" (local education directorate) in Sangarédi to ensure that staff can be appointed. Both the footbridge and the vehicular bridge are complete, as well as the access road. There are no outstanding actions with respect to provision and functioning of social and physical infrastructure.

#### 9.1.3 Livelihood Restoration at Hamdallaye and Fassaly Foutabhé

Following the July 2020 IESC finding that livelihood restoration activities had been considerably curbed following the COVID-19 restrictions, with almost no activity taking place between April and July 2020, a specific action was included in the subsequently updated ESAP, focusing on actions to be undertaken in a COVID-19 compliant manner. In response, CBG prepared a "contingency plan", to restart activities, safely, and expedite some of them. Since October 2020, CECI, the implementation partner, has re-established a regular presence in the area, and all livelihood restoration activities have resumed. Based on CBG's reports, significant progress appears to have been made in several areas, including:

- Land rehabilitation at Hamdallaye, with good progress in the preparation of the 56 ha of replacement agricultural land (recontouring and addition of topsoil). A two-year fallow period is planned before this land is finally cultivated by Hamdallaye residents<sup>37</sup>. CBG stated that that PAPs, to be allocated land parcels in the 56 ha, are aware that they will not be able to farm this land before the end of the fallow period;
- Good progress in agricultural Income Generating Activities at the Hamdallaye site, with full availability of the 26 hectares (near the Hamdallaye resettlement site) of land dedicated to these IGAs, and progress in developing both rain-fed crops and the irrigated garden (drip

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<sup>37</sup> The IESC understands that these PAPs have access to other lands that can be used for crop cultivation.



irrigation) planned at that site, with much of the equipment already in place and training of gardeners within the “economic interest group”<sup>38</sup> taking place. CBG reported that maize grown in this area had been subject to pest attacks that had significantly affected the harvest;

- Similar progress has been made in Fassaly Foutabhé, with the preparation of 8 ha of land dedicated to IGAs now complete and gardening and animal husbandry activities already taking place;
- Good progress in some of the non-land based IGAs (bakery, grasscutters, poultry) with the corresponding “economic interest groups” appearing to be successfully empowered in both Hamdallaye and Fassaly Fouthabé to be able to generate revenues; and
- Progress in completing the access road from the new Hamdallaye village to the traditional Hamdallaye farming areas in and around the N’dangara valley, although final completion has not been reached (the road is reported by CBG to be usable in its current state).

Importantly, a significant proportion of PAPs have not enrolled in any of the livelihood restoration activities. According to CBG, these are people that live in Sangarédi and are not interested in participating in any of the proposed livelihood restoration activities. The “refusal” rate is 28% at Hamdallaye and 8% at Fassaly Foutabhé. It is important for CBG to document these refusals, particularly in the context of the future completion audit, to ensure that CBG is not held accountable for the livelihood status of affected people that have refused all proposed livelihood restoration, and to ensure they can join the programme later if they change their mind (with a reasonable cut-off date to avoid disruption to the activity planning).

#### 9.1.4 Recommendations Pertaining to Hamdallaye and Fassaly Foutabhé

The IESC recommends the following:

- Hamdallaye resettlement site:
  - Finalize the few outstanding works (drainage);
- Fassaly Foutabhé:
  - Continue to liaise with the “*Inspection académique*” to obtain allocation of teachers to the reconstructed Fassaly Foutabhé school; and
- Livelihood restoration:
  - Ensure CECI mobilizes appropriate agronomy expertise, including consideration of alternative crops with better resilience to pests than maize (e.g. millet, groundnut, fonio for example have lower productivity but are more resilient to pests and dry periods) and mixed crops (e.g. sorghum/niébé) that can be conducive to female involvement as they allow production of leguminous plants that are typically crops grown by women;
  - Consider phosphorus and potassium fertilisation, as well as “green fertilisers” (nitrogen fixing leguminous species), to enhance the fallow period on the 56 ha area of land (a two-year fallow period may not be sufficient to enhance fertility as the vegetal association that will develop in this short period may not correct soil nutrient deficiencies;
  - Ensure gardening group members are properly prepared for the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know enough to do basic maintenance of drippers; and
  - Document refusals to enrol in livelihood restoration measures and allow people that did not enroll to join later if they change their mind, to avoid issues at the completion audit stage.

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<sup>38</sup> “Economic interest group” is the term used for a PAP group that operates a specific IGA.

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## 9.2 Kankalare RAP and LRP

The July 2020 IESC monitoring report confirmed very limited progress on community compensation measures (construction of a footbridge at Telebofi, construction of schools at Parawi and Niangaba, construction of a health centre in Parawi, and iron removal devices for the wells of these villages), while noting that these measures were meant to offset impacts that had taken place more than two years earlier. These measures are all commitments presented in the Kankalare RAP. Also, at that time, there had been no progress either on livelihood restoration planning, engagement in this respect with affected households, or implementation of any livelihood restoration activity.

The status of activities planned under both the Kankalaré RAP was found, in March 2021, to be the following:

- The Telebofi footbridge over the railway has been started. The nearby fence meant to improve villagers' safety has not started but procurement has progressed. The footbridge is expected to be finished in June and the fence in July 2021;
- Iron removal devices have been completed; and
- Procurement of contractors for the construction of the Niangaba and Parawi schools, the health post in Parawi, and wells in both communities has progressed and CBG reported that construction was expected to start in March 2021.

In terms of livelihood restoration planning and implementation, a draft LRP has been prepared and is now part of the Kankalaré RAP. The draft LRP is under review by Policy Lenders (PLs)/IESC. Preliminary comments indicate that the draft LRP is close to being acceptable. No livelihood restoration activities have started; however, CBG reported that these activities would start after the 2021 rainy season. *Post-VSV Note: Further to the VSV, discussions were held between the lenders, the IESC, and CBG on ways to offset the delay in starting livelihood restoration activities. A tentative way forward has been identified, which CBG is in the process of formulating.*

## 9.3 Thiapikouré LRP

The second draft of this LRP was submitted for the PL/IESC review in March 2021. Again, preliminary comments indicate that this LRP is close to being acceptable. No livelihood restoration activities have started.

## 9.4 MUOA LRP

The LRP has been validated by IESC/PLs but implementation has not started. CBG reported that they were reviewing the implementation strategy (particularly from an organizational perspective, the LR Committee model being difficult to implement in a linear project). Livelihood restoration activities are planned to start in September 2021. This date is of concern as the MUOA LRP was finalized in September 2020<sup>39</sup> resulting in a period of almost one year before livelihood restoration measures will be implemented for approximately 400 PAPs. It is recommended that CBG expedites the appointment of an implementing partner. MUOA activities have resulted in previously unexpected small-scale economic displacement and consequently several PAPs have been added periodically to this LRP. As the MUOA Project is only 53% complete as of end January 2021 (see Section 3.2), it is possible, but unlikely, that further small-scale 'PAP' additions will continue until the MUOA Project is completed by end June 2023.

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<sup>39</sup> This LRP has been amended twice since September 2020 to include small numbers of PAPs affected by more recent MUOA works.

## 9.5 Other Forthcoming LRPs

CBG elected not to follow the IESC's July 2020 recommendation to group LRPs based on their timeframe rather than by plateau. As a result, several LRPs are currently being prepared at the same time and in parallel. The LRPs currently in preparation are the following (with brief details on progress):

- N'dangara, Kagnéka and Parawi plateaux: surveys on-going, draft LRP expected to be submitted in by the end of Q3 2021 [pending agreement on dates in the revised ESAP]; and
- "Contingency Blocks" (these are a few relatively small non-contiguous areas): surveys on-going, draft LRP expected to be submitted by end of August 2021 [pending agreement on dates in the revised ESAP].

In 2022, CBG is likely to be implementing six discrete LRPs concurrently (the two above plus Kankalaré, Thiapikouré, the MUOA Project and Hamdallaye/Fassaly Foutabhé). Five of the six LRPs relate to areas that are very near to each other – the exception being the MUOA LRP which is focused on the entire railway corridor from Sangarédi to Kamsar. The IESC considers that implementing these five contiguous LRPs to be sub-optimal from an effectiveness and cost perspective, especially as the socio-economic characteristics of the affected population and proposed livelihood restoration activities are identical in all locations. The IESC recommends that grouping LRPs based on time-frame rather than geography would be more efficient and would result in economies of scale and resources for CBG. CBG was unwilling to adopt this recommendation for LRP preparation. However, the IESC recommends that CBG adopts it for LRP implementation. From a practical point of view there is no benefit, in fact there are significant transaction costs<sup>40</sup>, from different implementing partners with separate contracts, undertaking the same activities at the same time with PAPs belonging to neighbouring communities (or sometimes the same community as is the case for Parawi and Hamdallaye).

A more effective implementation model for these six concurrent LRPs would be to have one strong implementation coordination organization, and thematic partners for specific activities (e.g. grasscutter<sup>41</sup> breeding or gardening) across all LRPs. This would allow the use of Guinean partners for technical areas in which they excel, while ensuring that activities are coordinated and delivered on time through one strong partner given an overall delivery responsibility. The IESC is encouraged to learn that CBG, also, is considering using such a model and contacts have already been made with one large international NGO with good experience in Guinea.

## 9.6 Cumulative Impacts

In the past, the IESC had expressed concerns in relation to adverse cumulative impacts of land disturbance, both spatially and temporally, on some communities such as Hamdallaye, Fassaly Fouthabé, Parawi, and Paragogo. GIS and related tools are now in place to make better assessments of these cumulative impacts. Based on the current enhanced GIS capacity and using the survey results that were presented to the IESC during the site visit, it is recommended that CBG develops a methodology (such as an 'agricultural land balance' approach to track land availability per village over time) to assess the extent of cumulative impacts over time, and focusing on initially on those communities known to have been exposed to adverse cumulative impacts. The focus of the assessment needs to be the overall impact at the individual community level leading to an evaluation of the viability of some of the most-affected communities. This should be developed as part of on-going monitoring of Project impacts.

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<sup>40</sup> These costs include selection of service provider/s; negotiation of contracts, supervising and evaluating service provider performance.

<sup>41</sup> A large edible rodent.

## 9.7 Severance, traffic flow and economic displacement

In both Kamsar and Kolaboui there are rail/paved road crossings where traffic 'builds up' behind crossing barriers when a train is passing. A change from approximately 10 trains per day to approximately 40 trains per day (arising from the increasing amount of bauxite being exported by the MUOA users) will result in major changes in traffic queuing patterns at junctions with implications for wider traffic flows (for example, drivers trying to take different routes) and the attendant social and environmental impacts of the changes in traffic flows. For Kamsar, Kolaboui and perhaps other smaller urban and/or peri-urban areas, it may be expected that there will be economic impacts for businesses in the vicinity of certain junctions if traffic queueing, at these junctions, results in reduced access for drivers/passengers to the market/shops. There are also potential impacts from increased 'journey-to-work' times.

In its ESDD report on the MUOA Project (August 2019), the IESC recommended that a study be undertaken: a) on the medium and longer-term impact of the MUOA Project (essentially the increased daily frequency of train movements) on traffic flows (cars, trucks, motorcycles) and the indirect livelihood implications, especially in urban areas such as Kamsar and Kolaboui; and b) to identify and design measures to alleviate this impact in areas expected to be adversely affected.

In late February 2021, CBG confirmed that it had appointed an international consultancy to undertake this study. The final report, with mitigating measures, is expected to be available by end of September 2021. Thereafter, CBG will present the mitigation measures to the MUOA User's Committee, for possible implementation, by end of October 2021. The role of this Committee is important; though CBG is the operator of the railway, the impacts of train movements is result from the joint actions of all the mining companies transporting bauxite by this route.

## 9.8 North of Cogon Exploration

A NoCo exploration programme will be conducted from 2021 to 2024 in the Nord Lingourou area north of the Cogon river. Compensation planning is based on the Streamlined Compensation Process and LDP procedure, with inventories of affected crops and certain affected structures and cash compensation paid on that basis.

CBG stated that, due to planning constraints, compensation will be paid after land disturbance resulting in economic displacement occurs. This would be a non-compliance with respect to the PS5 requirement that any asset loss should be compensated prior to the asset loss. It is recommended that CBG ensures that compensation is paid before economic displacement, so that this non-compliance does not occur. *Post-VSV Note: CBG has stated, verbally, that CBG will pay compensation before the economic displacement impact occurs.*

The contractors will need to maintain personnel in the field and this means that 'fly-camps' (temporary camps usually at a distance from a base camp or operating base) will be required in a variety of locations for variable time periods for the duration of the exploration campaign. These camps will occupy land and agreements will need to be reached with holders of the rights to this land to enable these camps to be established and function. Similarly, contractors may require land for temporary laydown areas for materials and equipment. It is recommended that CBG ensures that these agreements are obtained and implemented in a PS 5-compliant manner, including provision of compensation prior to economic displacement, whether negotiated by CBG and/or one its contractors.

## 9.9 Resettlement Implementation Capacity

### 9.9.1 Findings

The IESC has repeatedly flagged its view that there is an inadequacy of resources dedicated to compensation, relocation, and livelihood restoration. While some progress had been noted in the IESC's July 2020 monitoring report, it was observed to be slow and not commensurate to the challenges faced.

During the March 2021 site visit, more substantial progress was observed by the IESC, as follows:

- There are now "focal points" that ensure a swift linkage between the resettlement team and the Engineering and Procurement departments. This is a most positive development and addresses a previous IESC recommendation;
- Within the resettlement team itself, two more technicians were appointed at the end of 2020 (resettlement and compensation). The "resettlement" technician should evolve towards a livelihood restoration profile as there is not going to be any physical displacement in the short term, while the LRP-related workload is going to increase very significantly from the 2021-2022 dry season; and
- Framework contracts have been put in place for survey-type work with Guinean companies SAMEC and SIGMA. Another framework contract for more conceptual work such as preparation of LRPs has been awarded to the Guinean branch of the consulting firm, INSUCO.

However, there are still some serious capability issues, particularly the following:

- The Resettlement Team now has a team member (services shared with the CR team) responsible for M&E implementation. However, the current M&E framework, included in the latest LRPs, is too complicated and should be streamlined focusing on a limited number of key indicators (it is preferable to obtain good data for 10 indicators at an agreed monitoring frequency than try to track 30 improperly or not regularly). In addition, baseline data collection and integration into a database that will enable effective M&E implementation is now a priority;
- Livelihood restoration remains under-resourced, a concern that could be addressed if CBG opts for the "implementation coordination partner" advocated by the IESC (see section 9.5 above); and
- The resettlement team remains, at this point, very predominantly male, with only one female (who is in fact seconded part-time from the Community Relations team but works largely for the resettlement team).

In addition, it was learned that the contract of the expatriate Resettlement Manager is soon coming to an end. There is a material risk of adverse consequences for resettlement planning and implementation if management continuity is not maintained.

### 9.9.2 Recommendations

The IESC recommends that CBG:

- Continues to 'staff-up' with a focus on livelihood restoration and/or considers a contractual arrangement with an implementation coordination partner;
- Simplifies the M&E framework for the LRPs under preparation and starts M&E information collection and integration into a database as a priority task;
- Seeks to reach a better gender balance in the resettlement team; and

- Ensures the expatriate Resettlement Manager’s position is extended for a period of time that will enable all LRPs (including the livelihood restoration component of the Kankalaré RAP) to be in place with all cash and/or in-kind compensation delivered and livelihood restoration measures being implemented effectively.

**Table 9-1: Summary of Findings, PS5**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2021_034	Hamdallaye resettlement	Some infrastructure works remain to be completed (e. g. drainage).	Operations	Complete the outstanding infrastructure works prior to onset of the 2021 rainy season.	<b>Minor</b>
March 2021_035	Fassaly Foutabhé	The school is not yet staffed.	Operations	Continue to liaise with “ <i>Inspection académique</i> ” (local education directorate) to ensure allocation of teachers.	<b>Moderate</b>
March 2021_036	Hamdallaye livelihood restoration	Crops have been affected by pests. The benefit of the 2-year fallow period on the 56 hectares is questionable if no other measures apart from provision of topsoil are taken to improve fertility.	Operations	Ensure that CECI mobilizes appropriate agronomy expertise and consider alternative crops with better resilience to pests and mixed crops and consider use of phosphorus and potassium fertilizers, as well as “green fertilizers”) to enhance the fallow period.	<b>Moderate</b>
March 2021_037	Hamdallaye livelihood restoration	The drip irrigation system is complex and entails strong collective management and maintenance capabilities.	Operations	Make sure ‘gardening’ IGA members are properly prepared for the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know enough to do basic maintenance of drippers.	<b>Minor</b>
March 2021_038	Hamdallaye livelihood restoration	28% of Hamdallaye residents have not enrolled in any of the livelihood restoration activities.	Operations	Document refusals to enroll and allow people that did not enroll to join later if they change their mind, to avoid issues at the completion audit stage.	<b>Minor</b>
March 2021_039	Livelihood restoration	CBG incurs transaction costs arising from LRP preparation and implementation being linked to mining of individual plateaux. Six LRPs will be implemented in 2021 each potentially with different implementing partners with separate contracts, undertaking the same activities at the same time with PAPs belonging to neighbouring communities (or sometimes the same community as is the case for Parawi and Hamdallaye).	Operations	Consider grouping LRPs by time period for implementation, rather than by plateau, to reduce transaction costs.	<b>Moderate</b>
March 2021_040	MUOA LRP	Livelihood restoration activities are planned to start in September 2021. This date is of concern as the MUOA LRP was finalized in September	Operations	CBG to expedite appointment of an implementing partner.	<b>Moderate</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		2020 resulting in a period of almost one year before livelihood restoration measures will be implemented for approximately 400 PAPs.			
March 2021_041	Cumulative impacts	There is no methodology for assessing cumulative land and livelihood impacts on the most affected communities, although CBG has obtained, recently, GIS tools that would allow such an assessment to occur.	Operations	Based on the current enhanced GIS capacity and using the survey results that were presented to the IESC during the site visit, develop a methodology to assess the extent of cumulative impacts on lands/livelihoods on the most affected communities and their overall viability.	<b>Moderate</b>
March 2021_042	NoCo Exploration	Compensation is to be paid after the impact of land disturbance (economic displacement) occurs contrary to the requirements of PS5.	Exploration	Ensure that compensation is paid prior to the impact of land disturbance (economic displacement) occurs.	<b>High</b>
March 2021_043	NoCo Exploration	Contractors are likely to require temporary rights to use/occupy land for fly-camps and laydown areas.	Exploration	Ensures that agreements to use/occupy land for fly camps and temporary laydown areas are obtained and implemented in a PS 5-compliant manner whether negotiated by CBG and/or one its contractors.	<b>Moderate</b>
March 2021_044	Resettlement resources and capabilities	IESC is of the opinion that the Resettlement team remains under-resourced for managing implementation of all current RAPs/LRPs plus LRPs being prepared.	Operations	Continue to 'staff-up' with focus on livelihood restoration and/or consider a contractual arrangement with an "implementation coordination partner".	<b>Moderate</b>
March 2021_045	Resettlement resources and capabilities	Gender imbalance in resettlement team.	Operations	Seek to reach a better gender balance in the resettlement team.	<b>Minor</b>
March 2021_046	Resettlement resources and capabilities	The Resettlement Team now has a team member (services shared with the CR team) responsible for M&E implementation. However, the current M&E framework, as included in the latest LRPs, is too complicated and should be streamlined focusing on a limited number of key indicators. In addition, baseline data collection	Operations	Simplify the M&E framework for the LRPs under preparation and start M&E information collection and integration into a database as a priority task.	<b>Moderate</b>



ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		and integration into a database that will enable effective M&E implementation is now a priority.			
March 2021_047	Resettlement resources and capabilities	Limited tenure of the expatriate Resettlement Manager and material risk of adverse consequences for resettlement planning and implementation if management continuity is not maintained.	Operations	Ensure momentum of livelihood restoration work is not affected and give consideration to extending or renewing the expatriate Resettlement Manager's contract is for a period of time that will enable all LRPs (includes the livelihood restoration component of the Kankalaré RAP) to be in place with all cash and/or in-kind compensation delivered and livelihood restoration measures being implemented effectively.	<b>High</b>

## 10. PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

### 10.1 Introduction

The biodiversity component of the VSV was completed through a series of meetings between the IESC biodiversity specialist and the CBG Biodiversity team. The attendees from the CBG Biodiversity team were:

- Biodiversity Manager;
- Botanical specialist;
- Faunal specialist;
- Rehabilitation specialist;
- Survey and inspection specialist: and
- A GIS and data specialist.

In addition, environmental and social specialists from both the IESC and the other Policy Lenders joined some meetings, such as the meeting to discuss land rehabilitation. The order of topics, presented below, reflects the sequence of the VSV meetings.

### 10.2 Biodiversity Inspections

To monitor the compliance of CBG activities, including the MUOA Project, against Project standards, and the management of biodiversity aspects by third parties such as SMB-W and COBAD operating within the CBG South of Cogon concession, the CBG Biodiversity team continues to undertake regular biodiversity inspections and/or contributes to multi-disciplinary inspections, as follows:

- CBG operations: typically, Biodiversity team only inspections, sometimes including members of the CR team; and
- SMB-W (railway) and COBAD (road): Multi-disciplinary inspection teams including a biodiversity specialist.

The scope of the biodiversity inspections is identical irrespective of an inspection team's composition. During the VSV, the monitoring of CBG operations was discussed separately to SMB-W/COBAD monitoring and, therefore, the key points from these two discussions are presented in separate sections below.

Overall, the IESC is satisfied that there is a clear, well organised programme for completion of inspections of CBG's operations and SMB-W/COBAD activities with good progress in implementing/closing-out required action in response to the teams' site-based observations

(situations of concern which are potential or actual non-conformities). Figure 10-1, extracted from a CBG presentation, shows the progress made for the three inspected projects.

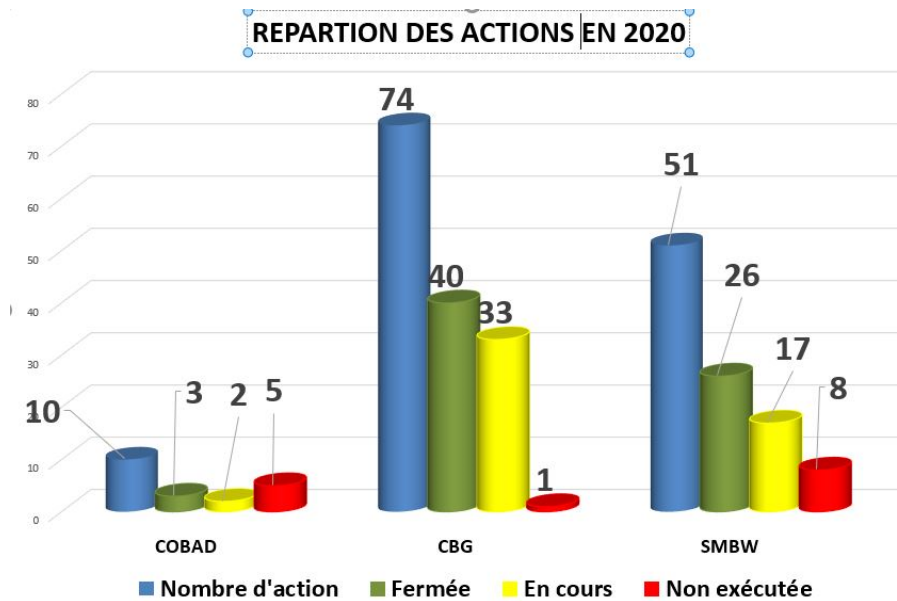


Figure 10-1: Progress of Action Completion Identified during all Inspections in 2020

### 10.2.1 CBG Inspections

Progress is excellent at CBG sites in addressing actions with 99 % of them either closed (54 %) or in progress to being closed (45 %) (Figure 10-1). Of note, when asked to produce a recent example of a non-conformity, the IESC was informed that no non-conformities were recorded in 2019 or 2020, and all observations, during this period, related to situations of concern which if addressed, quickly, would prevent non-conformities occurring.

The Biodiversity team presented the full process of an inspection for a particular site, the Hamdallaye Triangle area, from LDP through to rehabilitation. The Biodiversity team showed the relevant LDP (Ref:2020/1b/LD), inspection register, monitoring reports and photos of inspections whilst describing the process. Within Section 3 of the LDP, the biodiversity actions are outlined, and the inspection reports and photos show the CBG biodiversity team monitoring their implementation.

A key issue for inspections is to ensure that vegetation clearance and soil stripping does not extend beyond the agreed boundaries. To prevent any breach of this LDP condition, CBG biodiversity staff are now equipped with accurate, in-field GPS/GIS tablets, to allow the boundaries to be marked out during pre-works inspections and checked subsequently. During the course of the discussion, the IESC was informed by the Biodiversity Manager that it is intended that all CBG biodiversity staff will be trained in the use of the tablets in all aspects of monitoring and surveying.

An example of how the CBG Biodiversity team monitors activities on site outside formalised inspections was reported. A team member travelling on site observed plant machinery working too close to mature trees retained near the national road. He contacted the CBG Biodiversity Team Inspections Specialist who alerted the mining team supervisor and had the work stopped until the appropriate protections were put in place.

## 10.2.2 SMB-W and COBAD Inspections

### *SMB-W (Railway construction)*

To demonstrate the process for these inspections, an inspection of SMB-W activities, completed on 24<sup>th</sup> December 2020, was discussed in detail. During the inspection a non-conformity was identified in the form of unsuitable protection of a watercourse from potential pollution or sediment associated with the works. The Biodiversity team identified an action for SMB-W staff to install sediment controls and it was reported during the discussion that this had occurred. The version of the inspection register provided to the IESC following the VSV had not yet been updated to include information from the inspection on 24<sup>th</sup> December 2020 and so, at the time of preparation of this report, the IESC was unable confirm that the non-conformity raised during the inspection had been addressed along with other issues such as erosion control.

CBG reported that the Biodiversity team provided advice to SMB-W on erosion control and slope stabilisation and other rehabilitation work where it has not met the standards CBG would expect. Photographs shown during the discussion, such as Figure 10-2 below, show the slopes and lack of erosion control. Unlike CBG, SMB-W is not seeding the slopes and instead allowing natural colonisation of plants from the seedbank naturally occurring in the topsoil. At the time of this inspection, that topsoil had not yet been replaced, but with the intention for it to be deposited in future, wetter seasons. This delay increases the risk of erosion events before natural colonisation, or the risk of alien invasive species establishing and then potentially spreading into the wider CBG concession. The choice, also, not to seed the topsoil, once deposited increases those risks.



Figure 10-2: Unvegetated slopes on SMB-W project

Figure 10-1 shows good progress in SMB-W implementation of corrective actions with 84 % of these either closed (51 %) or in progress (33 %). A key concern from previous site visits was the issue of bushmeat being sold and eaten in and around the SMB-W works. In response to this, both CBG and SMB-W staff met with the local community and with workers to dissuade the practice and it was reported during the VSV session by the Biodiversity Manager that this, along with improved catering for the workers, has significantly reduced the prevalence of bushmeat consumption (see also Section 5.8).

Additionally, the Biodiversity team has been monitoring a location near Kourakoto, which it considers to be of high biodiversity value as it has recorded the presence of the endangered frog species *Phrynobatrachus pintoii*, the data-deficient frog species *Odontobatrachus smithi*, the data-deficient frog species *Arthroleptis formosus* and a 'potentially new to science' species of frog in

the *Conraua* genus. The location lies within 1 km of the SMB-W works. The Biodiversity Manager reported that this area has not been impacted, to date, by the SMB-W project.

As SMB-W works near completion, there is the potential for the site to be abandoned without rehabilitation. The IESC recommends that CBG engages now with SMB-W to agree biodiversity (and other as necessary) rehabilitation completion criteria for all SMB-W's construction-related sites. Inspections to include monitoring of site rehabilitation until completion criteria are met.

#### *COBAD (Road)*

On the COBAD inspections, the key concern for the IESC and IFC biodiversity specialists was the progress of restoration of the 'old' COBAD road which passes into the Boulléré Key Biodiversity Area (KBA). It was agreed with the local community to reduce it to a narrow track passable by people, livestock, motorcycles or bicycles, but not larger vehicles, which would allow larger scale production and transport of charcoal. From the photographs shown during the VSV presentation, the vegetation of the rehabilitated areas continues to develop well. However, a concern relating to biodiversity impacts remains because charcoal production is ongoing in the area and the remnants of the bridge might be continuing to facilitate the production and sale of charcoal as it continues to provide an access point across the river to reach the restored COBAD road. As this enhanced access issue relates to both biodiversity impacts and communities which might be benefitting from charcoal production, the IESC recommends that the CBG Biodiversity team meets with the CR Team to investigate the issue further before deciding on its next steps.

As a general finding, COBAD's performance in implementing CBG's corrective actions is less satisfactory compared to that of SMB-W. As shown in Figure 10-1, only 30% of the actions are closed and 50% are not started, with the remaining 20% in progress.

### 10.3 Biodiversity Action Plan Update

Since the previous VSV in July 2020, the Biodiversity team has been working with its consultants to update the Biodiversity Management System (BMS). A draft of the update, now referred to as the Biodiversity Action Plan (BAP) and including a Biodiversity Management Register (BMR) and No Net Loss/Net Gain Tracker (NNL/NG Tracker), was completed in December 2020 and provided to the IESC and Lenders for review and comment. A March 2021 VSV session was used to discuss the IESC/Lender comments on the draft and the key remaining points ahead of delivery of a final version. The IESC considers the BAP to be a much-improved document compared to the BMS and with the new BMR and NNL/NG Tracker will allow the CBG Biodiversity team to better deliver, monitor and report progress on actions. The final version of the BAP was provided to the IESC on 31 March 2021 and is undergoing Lender/IESC review at the time of reporting.

Table 10-1 provides an analysis of the status of the BMS actions at the time of transfer to the draft BAP. Actions considered to be completed or superseded in agreement with the IESC as set out in the July 2019 Monitoring Visit Report were not transferred to the BAP. The remaining actions were consolidated into a smaller number of actions, but without removing any BMS actions (other than those superseded).

**Table 10-1: BMS Progress**

Status of BMS Action	Number of Actions	Percentage of Total
Late	1	0.5%
Monitoring (long-term)	32	14.8%
In Progress	21	9.7%
Completed	154	71.3%
Cancelled	7	3.2%
Not started	1	0.5%
<b>TOTAL</b>	<b>216</b>	<b>100.0%</b>

ESAP item #26 requires the BAP to be accompanied by a Biodiversity Mitigation and Evaluation Plan (BMEP). At present, the information required for the BMEP is included in the EMoP and will be signposted within the BAP. Future BAP-related work will include transferring BMEP information into a standalone BMEP document. In terms of the further work required to deliver the suite of documents to support the BAP, CBG proposed the timeline set out in Figure 10-3. Subsequently, both the IESC and IFC have requested that the timeline be revisited with a view to condensing the proposed timeframes. CBG has delivered the updated BAP in line with the revised ESAP

## Actions clés du nouveau BAP

N°	Action	Responsibility	Road map
1	Develop the Biodiversity Monitoring and Evaluation Plan (BMEP).	Biodiversity Manager	Q4 2021
2	Define the baseline conditions against which losses / gains will be evaluated	Biodiversity Manager	Q1 2021
3	Estimate residual impacts on priority biodiversity	Biodiversity Manager	Q2 2022
4	Define NNL / NG objectives for priority biodiversity (NG/ NNL TRACKING)	Biodiversity Manager	Q4 2021
5	Develop and implement the community forest landscape management program (FLCMP)	Biodiversity Manager Community Manager	Q4 2021
6	Implement and review the BMEP	Biodiversity	Q3 2022

Figure 10-3: Proposed timeline for BAP key actions

deadline and CBG is currently in the process of securing the services of a consultant to help deliver the key follow-on actions. To monitor progress and help avoid further delays, the IESC recommends that CBG provides monthly updates, via existing status update communications, to Lenders/IESC on progress in implementing these actions.

### 10.4 Five Year Mine Rehabilitation Plan

A draft of the Five Year Mine Rehabilitation Plan was provided to the IESC and Lenders for review and comment in late 2020. Comments were provided to the CBG Biodiversity team and a VSV session was held to discuss the comments and understand CBG’s progress in addressing them. The IESC social specialist as well as social specialists from the Policy Lenders and CBG joined the session.

The IESC considers the draft Plan to be good, with clear commitments and approaches on how to improve rehabilitation of mined areas for the benefit of both biodiversity and local communities. Clear progress is being made in addressing the key IESC (and Lender) concern of the length of time that areas remain un-rehabilitated post-mining. Over the next five years, CBG has committed to completing at least 250 ha of mined rehabilitation per year with a target of approximately 3,000 ha total rehabilitated land in the South of Cogon concession by 2025. Key to achieving this target is continuing agreement between the Biodiversity team and the Mining department regarding budget and equipment to allow rehabilitation to be completed as set out in the Plan.

Three key issues emerged during the discussion for CBG to address. First, the reasoning for the locations and amount of land to be rehabilitated needs to be made clear within the Plan. 250 ha is certainly an increase in the amount previously rehabilitated each year, but it remained unclear after the discussion whether the current 1:1 ratio between land available for rehabilitation and land targeted for rehabilitation could be amended to increase the amount of land targeted for

rehabilitation. Secondly, it is clear from the Plan and the discussion that the availability of topsoil for rehabilitation remains a key constraint for CBG. It is fully understood that this results from the thin topsoil layer naturally occurring across the mining area. However, it is also clear that at the current rate of topsoil application for rehabilitation, CBG will not have sufficient topsoil for future rehabilitation. During the discussion, CBG set out some approaches, on how to undertake rehabilitation with very limited topsoil, which are not included within the draft Plan. It was agreed that such approaches need confirmed and presented in the final version of the Plan along with how they have been/will be communicated with local communities. This is because the social specialists identified that there is insufficient consultation with local communities on key issues such as topsoil, locations to be rehabilitated and rehabilitation/after-use objectives<sup>42</sup>. As seen during land rehabilitation for the 'new' Hamdallaye village, meeting the needs of the local communities is a key component of rehabilitation work. Finally, the discussion covered the need for CBG to engage with the local communities to discuss the need to balance use of rehabilitated land for agriculture with creation of natural habitat. At present, given the lack of proactive engagement the community preference for agricultural land tends to prevail.

## 10.5 Landscape-Level Plan

The ESAP (dated Dec 2020) requires CBG to prepare a landscape-level rehabilitation plan which is intended build on the existing PbP approach and integrate community development and biodiversity objectives into one overall Plan for the South of Cogon concession area. The Plan is in the early stages of development and a brief update was provided during the VSV, during which the link between the proposed plan and the on-site set aside/offset process was discussed.

The first step is for CBG to prepare a ToR for a consultant to be able to start to prepare the Plan. To reach an agreed ToR, Biodiversity, CR and Mining personnel held a one-day workshop on 4<sup>th</sup> February 2021 to discuss and agree the key issues to be addressed by the Plan and, therefore, included in the ToR. The final version of the ToR is due on 30<sup>th</sup> April 2021.

## 10.6 Réseau Environnement Bauxite and Collaboration with GAC

### 10.6.1 Réseau Environnement Bauxite (REB)

CBG continues to hold the presidency of REB<sup>43</sup>, the collaborative effort by six of the fourteen bauxite operators in the Boké region to develop a strategic plan and approach to mining, particularly focusing on cumulative impacts and landscape/regional level forest conservation and restoration.

The following progress was reported by the CBG REB representative since the July 2020 VSV:

- The CBG representative has met with the directors general of many other mining companies to encourage participation in REB and its initiatives;
- REB will be invited to board meetings of the Chamber of Mines;
- REB will hire a consultant to be based in Boké to support its various initiatives;
- The CBG representative is developing a budget for REB. CBG is contributing, but not all other companies have contributed funding yet; and
- The REB approach has been noted by the Guinean Government as an initiative to reconcile both economic and environmental benefit.

CBG is to be commended on its efforts with REB and the clear progress made to date. The IFC biodiversity specialist noted that IFC has attended a previous call at the invitation of CBG and

<sup>42</sup> Community consultations within the land rehabilitation process will be a feature of the revised and updated Stakeholder Engagement Plan.

<sup>43</sup> The Bauxite Environment Network.

that IFC is willing to support going forward through attendance at meetings or receipt of meeting Minutes and provision of any appropriate advice.

#### 10.6.2 Collaboration with GAC

During the previous VSV, it was recommended that CBG continue to collaborate with GAC as far as possible. Since then, a Memorandum of Understanding (MoU) has been agreed in principle between the two organisations and joint site visits completed within the Boulléré KBA, evidence of which was shown, for example, in the form of photographs of a site visit. The intention is for CBG and GAC should align their approaches to net gain calculations and metrics as far as possible to allow continued close working on both the Boulléré and the Moyen Bafing offsets.



**Table 10-2: Summary of Findings, PS6**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2021_049	BAP	Prior to delivery in line with the ESAP deadline, work to date on the new BAP was delayed on several occasions. Further work is required in the process of updating the BAP, namely the completion of the BMEP to replace the biodiversity sections of the EMOP and further development of the No Net Loss and Net Gain Tracker. Consequently, there is the potential for these longer timescale action to also be delayed.	All	Provision of monthly updates delivered during the bi-weekly E&S calls. These updates to cover the progress of the scheduled BAP actions and immediate notification of any expected delays.	<b>Minor</b>
March 2021_050	Five Year Mine Rehabilitation Plan	The plan contains insufficient information on measures to address limited topsoil for rehabilitation and how the approaches to addressing rehabilitation are communicated to local communities.	Rehabilitation	Updated Plan to contain information on the various approaches CBG might take to rehabilitate areas when topsoil is limited and how CBG will liaise with local communities to communicate its approach for rehabilitation and the need to balance use of rehabilitated land for agriculture with the creation of natural habitat.	<b>Moderate</b>

## 11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

### 11.1 Introduction

CBG is implementing the Cultural Heritage Management Plan (CHMP) and the implementation of this Plan was investigated during the VSV.

### 11.2 Cultural Heritage Management Plan: implementation

In 2020, there were 16 actions to be implemented and four were completed (three of these completed actions were actions postponed from 2019), as follows:

- Develop cultural heritage management content for HSECQ induction training for relevant CBG staff, contractors and third-party workforce;
- Include cultural heritage management content in HSECQ induction training for relevant CBG staff, contractors and third-party workforce;
- Integrate Multi-User [MUOA] cultural heritage data in the register; and
- Share all cultural and archaeological heritage knowledge and data (including GIS) with COBAD, including any new data as it becomes available (with approval of communities).

As indicated in Section 5.4.2, a clause concerning a requirement for managing cultural heritage has been drafted and is included into the draft HSECQ 'minimum requirements'. During a discussion on CHMP implementation, the IESC learnt that this clause did not include, explicitly, the implementation of the 'Chance Finds Procedure'. It is recommended that a requirement to implement the 'Chance Finds Procedure' is included into the HSECQ 'Minimum Requirements' before they are approved.

**Table 11-1: Summary of Findings, PS8**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2021_051	Cultural Heritage	The cultural heritage management component of the draft HSECQ 'minimum requirements' does not include, explicitly, a clause requiring implementation of the 'Chance Finds Procedure'	All	A requirement to implement the 'Chance Finds Procedure' to be included into the HSECQ 'minimum requirements' before they are approved.	<b>Minor</b>

## **APPENDIX 1 VIRTUAL SITE VISIT ITINERARY**

Day 1. Monday 8<sup>th</sup> March

Time slot	HSE TEAMS Room 1	Social (excl resettlement) TEAMS Room 2	Resettlement TEAMS Room 3	Biodiversity TEAMS Room 4
0900 – 10.30				
11.00 - 12.30				
	Lunch			
13.30-15.00	<ul style="list-style-type: none"> <li>Opening meeting</li> <li>Project status update including latest on mine plan (South of Cogon)</li> <li>Overview of all contractors incl. contractor details, activities being performed, number of workers (presentation from CBG)</li> <li>Measures to deal with COVID-19 including workers' welfare</li> </ul>	See HSE column	See HSE column	See HSE column
15.30-17.00	<ul style="list-style-type: none"> <li>HSECQ Resourcing</li> <li>Inspections overview COBAD Road, SMB, CBG)</li> <li>Application of LDP/status of master document and LDP procedure – demonstration of GIS</li> </ul>	See HSE column	<p>Overview of active resettlement/displacement areas, staffing, consultants, status update on key recommendations/action items from last site visit, grievances related to resettlement etc.</p> <p>MUOA LRP: Implementation and integration of 'gatehouse' and 'access road' PAPs - Update</p>	See HSE column

Day 2. Tuesday 9<sup>th</sup> March

Time slot	HSE	Social (excl resettlement)	Resettlement	Biodiversity
0900 – 10.30	HSE audit programme HSE performance (statistics) Permit status	i) Employee (direct and contracted) Issues: WGM + Code of Ethics ii) Local Content Management Plan: Action Plan Implementation Update iii) Collective Bargaining Agreement status and relationship with the union		Biodiversity Inspections: CBG Inspection register, reporting, evidence
11.00 - 12.30	Emergency Response	Community Health and Safety Management Plan: Action Plan Implementation Update	11:30 – 12:30: Thiapikouré LRP: Status Update (including plans for transitional measures and preparation of the impact assessment)	Biodiversity Action Plan, BMR and BMEP
Lunch				
13.30-15.00	Management of Change (review of MoC register and relevant documentation to confirm compliance with MoC Procedure)	i) CR+ Resettlement Teams: staff resources; equipment and training ii) ISOMETRIX: Implementation and Performance (with demonstration)	Hamdallaye and Fassaly Foutabhé: RAP Implementation -Progress Overview (excluding Livelihood Restoration)	
15.30-17.00	Dredging	Influx Management Plan: Action Plan Implementation Update	Hamdallaye RAP: Livelihood restoration measures/PRAMS+CECI performance – Update  Fassaly Foutabhé: RAP infrastructure commitments and livelihood restoration: Update Kankalaré RAP + LRP: Status Update	See HSE Column

Day 3. Wednesday 10<sup>th</sup> March

Time slot	HSE	Social (excl resettlement)	Resettlement	Biodiversity
0900 – 10.30	Waste management	Cultural Heritage Management Plan: Action Plan Implementation Update		
11.00 - 12.30		Road and Railway Safety Management Plan: Rail Safety Action Plan Implementation Update (focus upon MUOA 'transitional measures')		Biodiversity Inspections: SMB/COBAD Inspection register, reporting, evidence
	Lunch			
13.30-15.00	Water management (incl session on oil/water separator)	Community Development Plan: Action Plan Implementation Update	Contingency Blocks (i) and Plateaux (ii) LRPs: CBG plans for managing LRP preparation.  For (i) focus to be on transitional measures and impact assessments  For (ii) a general Progress Update	FLCMP, REB/BEN
15.30-17.00	EMoP –general status update  Air quality including ambient air and stack emissions monitoring		Monitoring and Evaluation: Current Practice/Future Intentions  Resettlement team: options for future staffing and resources	

Day 4. Thursday 11<sup>th</sup> March

Time slot	HSE	Social (excl resettlement)	Resettlement	Biodiversity
0900 – 10.30	Contractor Management (Implementation of CMP – HSE and HR/employee focus)	Contractor Management (in HSE mtg room)		-
11.00 - 12.30	Hazardous materials	5-year Rehabilitation Plan		5-year Rehabilitation Plan (in Social mtg room)
Lunch				
13.30-15.00	Noise and Vibration including monitoring	Exploration: North Cogon area	Exploration: North Cogon area Future extraction areas South Cogon (in Social mtg room)	Exploration: North Cogon area Future extraction areas South Cogon (in Social mtg room)
15.30-17.00	Resource use and energy efficiency (Action Plan Implementation Update)	i) Stakeholder engagement ii) Community Grievances and <i>Doléances</i>		



Day 5. Friday 12<sup>th</sup> March

Time slot	HSE	Social (excl resettlement)	Resettlement	Biodiversity
10:00 – 11:00				
	Lunch			
12.00-13.30	Closing meeting	Closing meeting (in HSE mtg room)	Closing meeting (in HSE mtg room)	Closing meeting (in HSE mtg room)
14.30-15.30		Land Rehabilitation and Relinquishment to Local Communities: Processes, Experiences and Lessons Learnt (July 2020 to date)	Land Rehabilitation and Relinquishment to Local Communities: Processes, Experiences and Lessons Learnt (July 2020 to date) (in Social mtg room)	Land Rehabilitation and Relinquishment to Local Communities: Processes, Experiences and Lessons Learnt (July 2020 to date) (in Social mtg room)

**APPENDIX 2**  
**KEY PROJECT DOCUMENTATION MADE AVAILABLE FOR REVIEW**

<b>Document Title</b>	<b>Organisation</b>
MT Greta K - Quality Certificate - Amspec Antwerp (00000002). AmSpec Certificate of [Fuel] Analysis, dated 4th December 2020	AmSpec
FORMULAIRE POUR EXERCICES DE SIMULATIONS 112_PRE14. 27.11.2020	CBG
RAPPORT DE SIMULATIONS AU PIT 112_PRE14. SIMULATION EXERCISE FORM (02/12/2020)	CBG
PERSONNEL TRANSFER ON VEESELS AT PORT OF KAMSAR; Procedure 253 POR 15 (Rev00 05/11/2020)	CBG
DS 20 2020 - Rapport d'adjudication et de négociation – Signé (dated 21 July 2020)	CBG
DS 20 2020 - Evaluation technique_HSE (printed 29 June 2020)	CBG
Lettre Directeur de la Mine au Maire pour l'occupation illégale	CBG
Compliance Request Lenders 2021 (worker grievance/compliance complaint register 2020; photos of grievance boxes <i>in situ</i> and evidence of dissemination of Code of Ethics and Business Conduct to CBG's contractors)	CBG
2020-11-26-Plan-Communications-CBG	CBG
Registre suivi plaintes et doléances com 2020 - 2021	CBG
191120_ Présentation HERITAGE CULTUREL pour induction HSEC	CBG
200207_ CR Présentation sur la gestion du patrimoine culturel issue du plan d'héritage culturel CHMP	CBG
200207_ LP_ Présentation sur la gestion du patrimoine culturel issue du plan d'héritage culturel CHMP	CBG
210308_CR_Resettlement Teams_Resources_Equipement_EN	CBG
CBG Mining Plan (undated)	CBG
Draft Scope of Work: Integrated Landscape Management Plan in CBG's South Cogon Concession (dated 31/03/2021)	CBG
Draft Five Years Rehabilitation Plan 2021-2025 (Version00 dated 17/12/2020)	CBG
TBC (2020), Biodiversity Action Plan for the operations of Compagnie des Bauxites de Guinée (CBG), Guinea, Version 1 – December 2020, The Biodiversity Consultancy Ltd. Cambridge, UK. (Draft)	Prepared by TBC for CBG

## **APPENDIX 3**

### **STATUS OF ISSUES IDENTIFIED IN PRECEDING MONITORING VISITS**

### Appendix 3.1 - Status of issues raised in July 2020 site visit report

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in March 2021)
July 2020_001	HSECQ resources - Environment Manager	The post of Environment Manager has been vacant since January 2020. This vacancy is having a significant impact on the timely implementation of environmental action plans and affecting oversight and direction of the Environment Team with subsequent impacts on environmental performance.	PS1	Recruitment of an experienced Environment Manager to be a priority and an appointment made at the earliest opportunity.	<b>High</b>	<b>Closed</b> Appointment made in December 2020
July 2020_002	HSECQ resources – recruitment and succession planning	There has been a relatively high turnover of senior staff with posts remaining vacant for several months at a time. The overall result has been detrimental to CBG’s management of HSECQ matters.	PS1	The recruitment process and role of the parties responsible for recruitment and succession planning to be reviewed, to try to avoid periods in which key HSECQ positions remain vacant thereby improving continuity of the team and knowledge base. Measures to recruit and retain key staff, including alternative conditions of employment to be considered.	<b>Moderate</b>	<b>Open</b>
July 2020_003	E&S Management Plans	The implementation of the Action Plans (embedded within the Management Plans) is, in most cases, significantly behind the schedules proposed by CBG.	PS1	Convene a multi-disciplinary working group to assess the need to amend specific Action Plans and recommend any required changes focusing upon i) duplication of actions between plans, ii) feasibility of implementing certain actions and iii) preparing revised timeframes as appropriate, in light of progress to date and uncertainties such as COVID-19. Also, these changes be made cognizant of short-term priority actions and CBG’s	<b>Moderate</b>	<b>Superseded</b> (see March 2021_007 and March 2021_008)

				<p>commitment to bring current operations up to a level consistent with the intent of the IFC Performance Standards by January 2024.</p> <p>Lenders must be informed of revisions in accordance with the MoC Procedure.</p>		
July 2020_004	SMB-W railway	Several poor practices have been identified at SMB facilities that are encouraging influx and sales of bushmeat. In addition, CBG inspections have resulted in anecdotal evidence of poor working conditions.	PS1	Additional consideration to be given to compliance against PS2, Labour and Working Conditions, in CBG inspections. In particular, CBG to consider influx, endeavour to inspect workers' camps and conditions, and speak to workers about contractual conditions, as soon as travel restrictions permit.	<b>Moderate</b>	<p><b>Open</b></p> <p>(IESC acknowledges that recent Inspection reports show enhanced consideration of labour/working conditions has occurred despite continuing COVID-19 restrictions)</p>
July 2020_005	CR and Resettlement Teams' staffing levels and access to external assistance	The CR and Resettlement teams will remain under considerable pressure to maintain effective delivery of their responsibilities plus any new functions that may be allocated to them. With the completion of Phase 1 of the Expansion Project, the IESC considers that it is appropriate to restate and update its main staffing recommendation, presented in its July 2019 monitoring report.	PS1	<p>Review the staffing situation, irrespective of planned addition of any new staff members by end 2020, in the context of the expected role/workload for the CR and Resettlement teams and the role and size of similar departments in other mining companies in Guinea and other West African countries (benchmarking).</p> <p>Following this review the HSECQ department will prepare and implement a Time-bound Recruitment Plan (2021 to 2023) to achieve the required complement of staff and 'on-call' consultancy resources (perhaps via a framework contract with a multi-</p>	<b>High</b>	<p><b>Open</b></p> <p>(Version 2 of the Time-bound Recruitment Plan (2021 to 2023) is under preparation and is expected to be issued by end June 2021. Version 1, focusing on period up to end June 2021, was prepared and is being implemented)</p>

				disciplinary consultancy or framework contracts with several specialist consultancies), Finance needed to ensure implementation of these actions to be included into the appropriate budget.		
July 2020_006	CR and Resettlement Teams' capacity and resources	The Time-bound Recruitment Plan requires a mechanism to be in place to deploy, effectively, all personnel and resources in the future.	PS1	Prepare and implement a time-bound Capacity Development and Resource Acquisition Plan (2021 to 2024). This Plan to include inter alia: acquisition/provision of adequate technical resources (such as GPS handsets, digital platform/s and vehicles), training in the use of equipment and the digital platform/s, and establishment of a continuing professional development procedure focusing on provision of training.	<b>High</b>	<b>Open</b> (Version 2 of the Capacity Development and Resource Acquisition Plan (2021 to 2024) is under preparation and is expected to be issued by end June 2021. Version 1, focusing on period up to end June 2021, was prepared and is being implemented)
July 2020_007	Stakeholder Engagement Plan (SEP)	The SEP is dated 2016 and is time-bound (however, with a flexible date for revision/updating, " <i>The SEP will be updated subsequent to completion of the phase 2 ESIA</i> "). In line with the SEP expectation, it was revised to incorporate the MUOA Project in June 2020. Given that the SEP has been in force for almost 5 years, it is now necessary for an overall SEP revision/update to occur.	PS1	Revise/update and re-issue the SEP. This revised/updated SEP should be clearly time-bound (January 2022 to December 2025) and disclosed publicly.  The current 2019-2020 Action Plan to be extended until the 31 December 2021 to cover the period before the revised/updated SEP is operational. This extended Action Plan will be aligned with the current version of the SEP (as amended to incorporate the MUOA Project).	<b>Moderate</b>	<b>Open</b> (Revised /updated SEP (2022-2025) is under preparation and will be issued by end of August 2021. The extended 'SEP' Action Plan is being finalized and is expected to be issued in the very near future)
July 2020_008	Community Grievances	Continuing lengthy delays in closing out certain grievances	PS1	Strengthen the ability of the HSECQ Monthly Committee Meeting to act promptly to ensure that there are no	<b>Moderate</b>	<b>Open</b>

				institutional 'barriers' to speedy actions in terms of: i)recognising the legitimacy of grievances; and then ii) implementing the actions to close them as quickly as possible.		(IESC notes that there are fewer lengthy delays in closing grievances)
July 2020_009	Community Grievances	Neither the community grievances ( <i>plaintes</i> ) and community requests for assistance ( <i>doléances</i> ) registers present a clear summary of action/s taken to address/respond to a community grievance or a community request for assistance.	PS1	Both the community grievance ( <i>plaintes</i> ) and community requests for assistance ( <i>doléances</i> ) registers to be amended to include a column to capture summary of action/s taken to address/respond to a community grievance or a community request for assistance.	<b>Low</b>	<b>Closed</b> (Additional columns added to the registers to present the required information)
July 2020_010	H&S incidents	There was a second serious accident at the port (two such incidents have occurred in the past two years), which would appear to have been readily avoided if safe practices had been employed.	PS2	A comprehensive safety audit of port operations and an assessment of the health and safety culture is needed. Remedial actions should be put in place should the audit reveal any shortcomings.	<b>Moderate</b>	<b>Closed</b> (new procedures developed to prevent recurrence)
July 2020_011	Workers' Grievance Mechanism	There is no PS-2 compliant Workers' Grievance Mechanism that covers CBG employees and/or contractor workers (there is an approved Workers' Grievance Mechanism, for MUOA contractors, and a draft CBG-focused Workers' Grievance Mechanism).	PS2	CBG acts to: i) Finalise the CBG-focused Workers' Grievance Mechanism (and to include a statement that it applies not only to direct employees, but potentially also to contractor employees if the contractor does not have a compliant Workers' Grievance Mechanism); and ii) Ensure that, during the process of appointing contractors, CBG checks that contractors have a PS2-compliant Workers' Grievance Mechanism and, if	<b>Moderate</b>	<b>Closed (i)</b> (The Workers' Grievance Mechanism has been finalized and disclosed to CBG employees and contractors)  <b>Open (ii)</b> (See March 2021_022)



				not, requires the adoption and implementation of the CBG Worker’s Grievance Mechanism by the contractor (in line with section 6.5 of the Contractor Management Plan).		
July 2020_012	Workers’ Grievance Mechanism	There is no PS-2 compliant Workers’ Grievance Mechanism that covers both CBG and contractor workers (there is an approved Workers’ Grievance Mechanism aimed at contractors and a daft CBG-focused Workers’ Grievance Mechanism).	PS2	Once the Workers’ Grievance Mechanism is approved, CBG to disseminate it to all CBG personnel and all its contractors, needed for its core business processes (as defined by PS2), for adoption by all contractors that do not have a PS2-compliant Workers’ Grievance Mechanism. CBG and Contractors will reinforce the message to both their own staff members, and in the case of contractors to sub-contractors, that CBG operates a procedure whereby all direct and contracted workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.	<b>Moderate</b>	<b>Open</b> (The Workers’ Grievance Mechanism has not yet been finalized and disclosed to all CBG employees and contractors. See March 2021_021)
July 2020_013	Worker demobilisation	The final demobilisation period of the Phase 1 Expansion Project will occur soon.	PS2	CBG to prepare a Worker Demobilisation Plan and a Demobilisation Close-out Report for the remaining Phase 1 Expansion workers to be demobilised and who are still employed to construct houses. The Plan must include a requirement for CBG to undertake an audit of the supervisory contractor’s procedure,	<b>Minor</b>	<b>Open</b> (The houses are not yet completed - delay caused by COVID restrictions)

				and accompanying documentation, for managing the demobilisation process.		
July 2020_014	Contractor/Sub-contractor labour and working conditions (LWC) management	CBG only applies, currently, a passive management approach to LWC management of contractors and sub-contractors.	PS2	Once the HR Manual is in place, the HR department to prepare a brief implementation action plan to ensure that CBG will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This action plan to include capacity-building for key staff and, as necessary, revision to existing functional responsibilities.	<b>Moderate</b>	<b>Superseded</b> (See March 2021_022 with respect to contractor bid evaluation and contractor management)
July 2020_015	Air quality – finalisation of the AQMP	Preparation of an updated AQMP, inclusive of stack emission limits for bauxite dryers is behind schedule and agreed dates for delivery of an Interim AQMP have lapsed.	PS3	Appoint a competent air quality specialist/organisation to carry the works in accordance with an agreed scope of work at the earliest opportunity.	<b>High</b>	<b>Closed</b> Contracts in place with international AQ expert
July 2020_016	Air quality – ambient air quality monitoring	The scope of air quality monitoring undertaken falls short of the scope specified in the EMoP, both in terms of range of parameters analysed and location of sampling points. The reduced scope is due largely to faulty equipment and calibration issues.  The reduced sampling capability is reflected in the limited results presented in the 2019 AMR which was consequently found to be inadequate.	PS3	Conduct a comprehensive review of air quality monitoring capabilities and identify corrective actions with consideration given to: <ul style="list-style-type: none"> <li>in-house competencies to operate and maintain complex equipment/training needs; and</li> </ul> procurement of spares (holding spares in stock).	<b>High</b>	<b>Superseded</b> (see March 2021_023)
2020_017	Air quality - disclosure of monitoring results	The SEP outlines several initiatives relating to participatory monitoring, including presentation of monitoring results, which are not implemented.	PS3	Revisit the statements made in the SEP and give further attention to the presentation of monitoring results (air quality results and others as relevant) to key stakeholders such as affected communities. The IESC recommends	<b>Moderate</b>	<b>Superseded</b> (see March 2021_024)

				CBG's disclosure to affected communities should be reported in the AMR.		
July 2020_018	Water Quality – oil/water separator	Discharges from the oil/water separator located adjacent to the tank farm in Kamsar continue to exceed the IFC limit.	PS3	Priority to be given to finalising and implementing a preferred engineering solution to ensure the treated effluent satisfies the IFC oil-in-water limit.	<b>Moderate</b>	<b>Superseded</b> (see March 2021_025)
2020_019	Water quality – WWTP at Sangarédi	The installation of the UV treatment plant at the Sangarédi WWTP remains an outstanding issue despite the plant being in-country.	PS3	Priority should be given to completion of this installation to prevent further delay, pending the lifting of current COVID-19 travel restrictions.	<b>Moderate</b>	<b>Open</b> Progress made, but UV plant still to be installed.
2020_020	Water quality monitoring	CBG is not analysing all water samples in accordance with the EMoP and does not currently have a contract with an external laboratory for analysis of complex parameters and for quality assurance purposes.	PS3	Full water quality analytical capability to be procured as a matter of priority to ensure analysis of all samples in accordance with the EMoP, during a transition period, to allow CBG to strengthen its own capabilities, noting that COVID-19 is delaying procurement of certain analytical equipment.	<b>Moderate</b>	<b>Superseded</b> (See March 2021_023)
July 2020_021	Water quality – reporting in the AMR	The AMR indicates that several samples and/or analyses were not conducted in accordance with the EMoP. The AMR further indicates that measures/actions plans are underway to address exceedances, however there is little detail about the actions taken or the timeframes for such actions.	PS3	Where there are exceedances against applicable standards, or samples/analyses could not be taken, the reasons for such omissions should be detailed in the AMR. Corrective actions with indicative timeframes should also be described in the AMR.	<b>Minor</b>	<b>Open</b> (can only be closed following receipt of the 2020 AMR)
July 2020_022	Noise and vibration	CBG has been unable to meet the noise monitoring requirements specified in the EMoP because of faulty monitoring equipment and more recently COVID-19 travel restrictions.	PS3	The procurement of additional noise meters should allow CBG to undertake the noise sampling programme as specified in the EMoP.  Better presentation and interpretation of noise and vibration results relative	<b>Minor</b>	<b>Closed</b> (new equipment purchased)

		Noise and vibration data provided in the 2019 AMR (and its appendices) was of limited value.		to applicable standards is required in future AMRs.		
July 2020_023	Solid waste	CBG has reported that it plans to start reusing the municipal facility at Bendougou for Kamsar municipal waste, and periodically help clear residential areas of wastes. In the past, CBG encountered community resistance when attempting the transport of heavy garbage trucks through villages <i>en-route</i> to the Bendougou landfill facility.	PS3	Engagement needed with affected communities, located along the access route, prior to any recommencement of transport of heavy garbage trucks through villages <i>en-route</i> to the Bendougou landfill facility.	<b>Moderate</b>	<b>Superseded</b> (see March 2021_028)
July 2020_024	Resource use – water consumption	CBG is also looking to undertake urgent maintenance of the water distribution system including investigating illegal offtakes in communities. Such an initiative has the potential to provoke and adverse community response, especially where security provision may be required.	PS3	Any decision to prohibit the illegal offtake of water should be managed with full involvement of the CR team to reduce the risk of community tensions.	<b>Minor</b>	<b>Closed</b>
July 2020_025	Resource use – GHG emissions	CBG did not report GHG emissions in the 2019 AMR. Furthermore, many of the measures specified in the RUEEMP Action Plan are behind schedule, including reaching internal agreement on use of an internationally-recognised method for the calculation of GHG emissions.	PS3	CBG should report GHG emission in the 2020 AMR. In order to do so it should first agree internally on a methodology for calculation of GHG emissions consistent with the need for an internationally recognised methodology.  CBG should also commission an external energy efficiency consultant to identify opportunities to reduce energy use and therefore GHG emissions.	<b>Moderate</b>	<b>Closed</b> (GHG emission calculation methodology in place. CBG rejected the suggestion of an energy audit, but continues to look for energy saving opportunities.)

July 2020_026	Community H&S risks	The rail-related risk to community members has increased over the past two years and will continue to increase until end 2022.	PS4	The Rail Safety Management Plan (and Action Plan) to be revised and updated as a priority and every effort made to ensure that the current schedule for installation of crossings such as footbridges does not experience delays.	<b>Moderate</b>	<b>Open</b> (The Rail Safety Management Plan (and Action Plan) is being revised currently. Some additional delays have occurred causing the completion date for installation of crossings to be pushed back by a few months)
July 2020_027	Hamdallaye resettlement – resettlement site	Delivery and effectiveness of training on use of domestic facilities such as latrines and household hygiene is required.	PS5	Evaluate effectiveness of training to date, especially regarding training on use of domestic facilities such as latrines and household hygiene for men, women and children, and, as necessary, provide targeted refresher training.	<b>Moderate</b>	<b>Closed</b> (Training reported to have been delivered)
July 2020_028	Hamdallaye resettlement – resettlement site	Outstanding works (runoff drainage, access roads to agricultural land, teachers' houses, plantations near community facilities, etc...) need to be completed	PS5	Expedite procurement and execution of the few outstanding works (runoff drainage, access roads to agricultural land, teachers' houses, plantations near community facilities, etc...). Works to be completed by end of 2020.	<b>Moderate</b>	<b>Open</b> (pending drainage works)
July 2020_029	Hamdallaye resettlement – resettlement site	Housing and infrastructure deficiencies and 'open' residents' grievances	PS5	Implement a rapid PAP satisfaction survey after the end of the rainy season to identify any deficiencies so that they can be addressed timely. To be done in Q4 2020.	<b>Moderate</b>	<b>Open</b> (now captured as an ESAP item)
July 2020_030	Hamdallaye and Fassaly Foutabhé – livelihood restoration	Delays in delivery of livelihood restoration work streams for both Hamdallaye and Fassaly Foutabhé due to COVID-19 restrictions on movements.	PS5	Prepare an implementation plan with input from local authorities and taking COVID-19 restrictions into account, to maximise CECI's on-site activities in	<b>High</b>	<b>Closed</b> (addressed as an ESAP item)

				the second half of 2020 and into Q1 of 2021.		
July 2020_031	Resettlement Team	The Resettlement Team members are all males.	PS5	Future recruitment to aim to improve gender balance of the team.	<b>Minor</b>	<b>Superseded</b> (see March 2021_046)
July 2020_032	Procurement	Procurement delays have hindered resettlement-related actions such as community infrastructure provision	PS5	Designate “focal persons” for resettlement-related requirements in general services departments, who will be responsible and accountable for timely delivery of services.  Also, more use of outsourcing when internal resources are stretched (for example, for design of simple community infrastructure).	<b>High</b>	<b>Closed</b>
July 2020_033	Consultancy support	The Scope of Work for the framework contract with a consulting firm to cover socioeconomic and asset surveys, for resettlement planning work, has not yet been prepared.	PS5	The Scope of Work for the consultant should include, also, the drafting of LRPs and RAPs in addition to field-based work such as asset inventories and engagement.	<b>Moderate</b>	<b>Closed</b> (two framework agreements in place)
July 2020_034	Integration of mine and resettlement planning	The current approach of preparing LRPs on an PbP basis is complex and adds to CBG staff workload.	PS5	CBG to consider preparing LRPs for two- to three-year mining cycles rather than by plateau.	<b>Moderate</b>	<b>Superseded</b> (see March 2021_040)
July 2020_035	REB: landscape scale initiatives	The CBG biodiversity team has an opportunity to develop and lead best practice in mine rehabilitation through its current presidency of REB and activities on site.	PS6	The biodiversity team should continue to be supported by management with sufficient resources to maximise the REB opportunities. Within CBG, management should ensure an integrated approach to rehabilitation between the Biodiversity and CR teams.	<b>Moderate</b>	<b>Open</b> (open as it is ongoing. Note, good progress with CBG using its presidency to move the REB plans forward. Specific actions such as agreeing a budget, appointing a consultant,

				<p>CBG should develop a work plan for its presidency of REB, including resource and cost information.</p> <p>The IESC notes that IFC is interested in attending a REB meeting as an observer if possible.</p>		publishing guidance will act as KPIs of progress.)
July 2020_036	Mine Rehabilitation	<p>A key factor limiting progress in rehabilitation is availability of mined land and equipment provided by the mining department.</p> <p>The PbP approach works very well at a plateau level, however at a concession/landscape level the PbP is a less effective approach. In order to address this, a landscape level assessment should be developed to work in parallel with the PbP approach.</p>	PS6	<p>In order to meet both its target to reduce the ratio of active mining:rehabilitated land to 1:1, and its 5-year catch-up target, senior management to implement measures to ensure swifter provision of land post mining, with equipment when needed, in order to allow timely rehabilitation..</p> <p>Develop a landscape-level plan for the concession, building on the existing Plateau by Plateau (PbP) approach, that integrates community development and biodiversity objectives. The intent should be to provide strategic guidance to location and focus of rehabilitation, community development, and on-site conservation activities.</p>	<b>High</b>	<p><b>Closed</b></p> <p>This plan has been drafted and reviewed by the IESC and lenders. Following a VSV session, this plan will be finalised.</p>
July 2020_037	Collaboration with GAC	Successful collaboration with GAC is key for the success of the Boulléré onsite offset as the offset area crosses concession boundaries.	PS6	Need for closer collaborative working, on the offset, to be raised to a higher management level in CBG’s discussions with GAC, to help ensure the success of the offset, to the benefit of both companies.	<b>Moderate</b>	<p><b>Open</b></p> <p>Pending signature of draft MoU between CBG and GAC, however IESC notes good progress in collaboration.</p>
July 2020_038	Dredging Report	CBG needs to consolidate the results of its 2019 dredging activities into a single report to meet the DMP requirement. It	PS6	Prepare and provide a 2019 dredging report	<b>Minor</b>	<b>Closed</b>

		seems from discussions that the dredging was completed largely in compliance with the DMP, however the IESC needs a consolidated report to verify this.				(Dredge Monitoring Report produced, dated 14 November 2020)
July 2020_039	Marine Surveys	New marine surveys are required in order to ensure that the baseline is sufficiently robust, both temporally and spatially, to inform future activities such as the planned dredging in 2021 and, also, conservation efforts to deliver No Net Loss/Net Gain.	PS6	Surveys must be completed in a timely manner prior to future dredging activities/use of new dredge spoil disposal site(s).	Moderate	<b>Open</b>
July 2020_040	Base location for Biodiversity team	The Biodiversity team is based in Kamsar and make long journeys to Sangarédi for any site work or meetings. Being based in Sangarédi would allow the team more flexibility to work to the best of its ability.	PS6	The Biodiversity team should have a permanent base in Sangarédi as well as one in Kamsar.	Minor	<b>Open</b>



### Appendix 3.2 - Status of residual issues that pre-date the July 2020 site visit report.

Note, issues previously categorised as either superseded or closed, as reported in the July 2020 IESC monitoring report, are not repeated in this table.

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in March 2021)</b>
July 2019_ 004	Security management	The HSEC briefing given to the IESC and Lenders did not include information about site evacuation in case of a major security issue.	All / PS4	CBG should strengthen its induction procedure(s) to ensure visitors are aware of the procedure to follow in case of a site evacuation.	<b>Moderate</b>	<b>Open</b>  (unable to close via VSVs)
July 2019_ 006	PbP approach	During the July 2019 visit the IESC was informed that the PbP reference document was undergoing review by senior discipline leads.  To date CBG has not performed modelling studies in support of the PbP approach.	Operations / PS1	The reference document should be finalised a matter of priority.  Any decision not to perform environmental modelling in support of the PbP approach needs to be justified and agreed with Lenders.	<b>Moderate</b>	<b>Closed</b>  (Reference Document finalised).  <b>HOLD</b> (to be updated in final version of this report)
July 2019_ 015	Waste recycling	To date there has been no representative from the HSEC team participating in the recycling committee.	Operations / PS3	The HSEC is seeking representation from its team. The IESC strongly supports this measure.	<b>Minor</b>	<b>Open</b>
July 2019_ 018	Security provision by contractors	Currently, Sogea Satom (one of the MUA contractors), employs three security providers. The guards are not formally trained. Most guards come from the local communities and are not armed. This lack of training poses a risk to CBG.	All / PS4	CBG to review its supervision with respect to contractors and the hiring and deployment security providers to ensure that contractors' practice is aligned with CBG's own practice with respect to hiring and deployment of private security providers.	<b>Minor</b>	<b>Open</b>
July 2019_ 022	Hamdallaye resettlement – school and clinic	Experience in Guinea suggests that timely allocation of teachers and medical	Operations / PS5	Engage at high-level with the Ministries of Education and Health to facilitate timely allocation of staff to	<b>Moderate</b>	<b>Closed</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in March 2021)</b>
		personnel to new schools and health facilities may be problematic.		the Hamdallaye resettlement site school and clinic prior to completion of the relocation process.		
July 2019_023	Hamdallaye resettlement – school	Experience in Guinea suggests that where no housing is provided to teachers, they may not stay.	Operations / PS5	Ensure that houses are built for teachers at the Hamdallaye resettlement site prior to completion of the relocation process.	<b>Moderate</b>	<b>Closed</b> (Houses are built, teachers have been posted and are in place)
July 2019_028	Kankalaré resettlement – RAP	The RAP does not include a livelihood restoration programme.	Operations / PS5	Devise a livelihood restoration programme for Kankalaré based on principles similar to those applied for Hamdallaye and amend the RAP accordingly.	<b>High</b>	<b>Open</b> (Progress made - RAP and LRP under review).
July 2019_029	Kankalaré resettlement – measures for host communities	Limited progress on measures meant to offset impacts to host communities of Kankalaré resettlement.	Operations / PS5	Expedite planning and implementation of these measures: a road to Parawi village and for Telebofi: provision of footbridge over the railway; erection of fencing along railway for the stretch where the railway passes beside the village; and iron-removal devices for wells.	<b>High</b>	<b>Open</b> (progress made – captured in the ESAP and to be closed following construction of footbridge).
July 2019_030	Forthcoming compensation (Thiapikouré plateau)	The Thiapikouré plateau, which is not currently covered by a RAP or LRP, will be mined in near future. Surveys have been carried out and compensation was about to be paid at the time of the July 2019 visit.	Operations / PS5	Prepare an LRP for economic displacement resulting from proposed mining on this plateau.	<b>High</b>	<b>Open</b> (The LRP is being prepared, but not yet finalised).
July 2019_031	Kankalaré resettlement – loss of	A community school ceased to exist after relocation of Kankalaré residents leaving children from a number of small settlements without a school to attend.	Operations / PS5	Investigate this issue further (it is not mentioned in the current version of the Kankalaré RAP) and address it with relevant representatives of the	<b>High</b>	<b>Closed</b> (The Kankalaré RAP identifies this school as being a school built and operated by

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in March 2021)</b>
	community school			Ministry of Education (perhaps in conjunction with the staffing issue related to the 'new' Hamdallaye school – see above).		Telebofi residents. The RAP requires a school to be built at Niangaba, near Telebofi).
July 2019_032	Forthcoming compensation	Criteria for deciding on applicability of the 'streamlined compensation approach' or another resettlement planning tool are not clear.	Operations / PS5	Clarify criteria under which the 'streamlined compensation approach' is acceptable, agree these with IESC and Policy Lenders, and revise the Resettlement Policy Framework accordingly.	<b>High</b>	<b>Open</b> (Revised Compensation and Resettlement Policy Framework is under review by Lenders/IESC but is not yet finalised).
July 2019_035	All activities – Gender and inclusiveness aspects	The CBG team do not necessarily require presence of women and youth in community meetings.	Operations / PS5	Ensure that the presence of women and youth is required at all stakeholder engagement events.	<b>High</b>	<b>Open</b> (open, although IESC acknowledges CBG is implementing a number of approaches to increase female participation)).
July 2019_036	Resettlement – grievance management	Some grievances are reviewed by the Commune before they are lodged with CBG.	Operations / PS5	Grievances should be lodged first with CBG and then reviewed with the Commune.	<b>Moderate</b>	<b>Closed</b>
July 2019_038	Biodiversity Management System	Review and Update of BMS.	PS6	CBG Biodiversity Team to complete review and update of BMS prior to current team manager leaving the role to work on the off-site offset. Additional deliverable required is a document justifying those actions now considered not to be relevant and/or undeliverable from the original BMS in order to inform the Management of Change Process.	<b>Moderate</b>	<b>Closed</b> (BMS has been reviewed and superseded by a BAP)

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in March 2021)</b>
July 2019_ 039	Freshwater Fish Critical Habitat	Actions 197-201 of the BMS remain uncompleted despite them relating to a critical habitat issue and the requirement for them needing to be progressed having been discussed repeatedly since 2017.	PS6	Whilst it is acknowledged that the PbP approach aims to avoid impacts on all watercourses, these actions must be enacted immediately to provide the IESC with confidence that they can and will be fully addressed.	<b>High</b>	<b>Open</b>  (CBG is working with a specialist eDNA company to progress eDNA surveys and is progressing a physical survey for freshwater fish).
July 2019_ 042	Boulléré KBA - Chimpanzee studies	Sylvatrop also completed a study of chimpanzees for GAC.	PS6	CBG should liaise with GAC to agree to work collaboratively on the subject of chimpanzees in the Boulléré KBA as it is likely to be the same group of animals using both concession areas. (This recommendation mirrors recommendation Dec 2018_33 which had not been completed by July 2019).	<b>Low</b>	<b>Open</b>  (Through the agreement in principle of a MoU with GAC, CBG will be able to work collaboratively with GAC on the subject of chimpanzees. Evidence of this would close this finding.)
July 2019_ 043	Réseau Environnement Bauxite	CBG is taking an active role in the collaborative working group with other mining operators in the area.	PS6	CBG should continue to take an active role in the REB and where REB develops new documents regarding biodiversity, these should be shared with the IESC.	<b>Minor</b>	<b>Closed</b>  (Progress is good, CBG is currently leading the REB).
July 2019_ 044	COBAD Road	CBG is actively restoring the COBAD road.	PS6	The restoration of the COBAD road completed to date is excellent and appears to be successful. However, the IESC suggests that in those locations where the remaining unrestored road is wide enough for vehicles to pass, these should be reduced to the width of a path, non-passable by vehicles. Exceptions to this may be acceptable where particular needs necessitate, however	<b>Moderate</b>	<b>Open</b>  (requires in country site visit to close)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in March 2021)
				the potential impacts upon biodiversity of such exceptions must be considered in detail, particularly where the impacts challenge the effectiveness of conservation efforts in the area.		
July 2019_045	SMB Railway	SMB is constructing a railway through the south-eastern part of the South Cogon Concession area.	PS6	CBG has commenced and progressed dialogue with SMB to attempt to ensure that SMB's works within the CBG concession are as closely aligned with the CBG PS6 commitments as possible. This liaison should continue and SMB's activities continue to be monitored.	<b>Minor</b>	<b>Closed</b> The CBG HSECQ team continues to inspect and liaise with SMB and BGEEE)
Dec 2018_001	Audit programme	The current audit and inspection procedure is dated Jan 2014 and was scheduled for review in 2016. It is unclear whether the review took place.	All	The procedure should be reviewed and updated if necessary, to ensure it reflects current practice.	<b>Minor</b>	<b>Open</b>
Dec 2018_005	Community grievances	There are 4 legacy grievances that remain open.	Construction	CBG should decide soon whether there is a realistic possibility of closing any of the old open grievances, and if not, to close them officially. This action will require informing the complainant/s of the decision with reason/s provided and then recording the decisions (with reason) to close them in the grievance register.	<b>Minor</b>	<b>Open</b> (The IESC notes that there is now only one grievance open (Bintimodia village and closure of sand quarries). It is expected that the grievance will be closed by the end of April 2021. One of the other grievances entered the judicial process).

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in March 2021)
Dec 2018_ 009	Oil spill at the Filima power plant	CBG reported a Spill of 6437 litres inside the Filima Power plant via the GFA (a Class I Non-Conformance).	Operations	CBG to implement the actions identified in the incident investigation report. Furthermore, CBG should review the design of the fuel storage area, and in particular the need to elevate large volumes of fuel at height.	<b>Minor</b>	<b>Open</b> (HOLD -Pending information on corrective actions implemented).
Dec 2018_ 010	Waste management – temporary storage areas adjacent to secondary crusher and elsewhere	The volumes of stockpiled wastes have increased significantly. A number of housekeeping issues are observed: <ul style="list-style-type: none"> <li>• Unlabelled drums;</li> <li>• Hydrocarbon staining;</li> <li>• Trips hazards;</li> <li>• Likely VOC emissions from open drums; and</li> <li>• Poor signage on shipping containers intended for temporary storage of hazardous wastes.</li> </ul> Elsewhere, spent oil for use as fuel for the dryers is stored in in sealed metal containers but without secondary containment.	Construction	CBG should improve practices at this and other temporary storage areas, for example, labelling of hazardous storage areas and general house- keeping to reduce safety hazards) and expedite removal of wastes to be recycle by external service providers e.g. the large volumes of scrap metal witnessed.  The large volumes of used oil being stockpiled in the dry season, prior to use as fuel for the burners in the wet season, should be stored in dedicated areas with secondary containment.	<b>Minor</b>	<b>Closed</b> (Temporary waste storage areas largely cleared, containers labelled, spent oil used as fuel for the dryers)
Dec 2018_ 011	Waste management – Sangaredi landfill	Anecdotal evidence was provided indicating that people scavenge from the site once security personnel are off duty.	Operations	CBG should confirm whether people are scavenging when the guards are not present and review the effectiveness of the security presence and the risk posed to community members in the light of its findings. In the event people are scavenging in	<b>Minor</b>	<b>Open</b> (security presence remains, and fencing being erected as of March 2021).

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				hours of darkness, the effectiveness of the security presence, in terms of protecting human health, should be reviewed.		
Dec 2018_013	Noise mitigation – surface miners	The surface miner was broken at the time of the visit. The possession of a single surface miner represents a risk to CBG's ability to implement the key noise mitigation measure in proximity to sensitive receptors i.e. where use of surface miner is required in place of blasting.	Operations	CBG should expedite the intended procurement of additional surface miners to ensure breakdowns/maintenance of surface miner(s) does not limit ability to implement noise mitigation.	<b>Minor</b>	<b>Open</b> (as of March 2021, CBG has 1 surface miner awaiting repairs, however a plan to procure two more surface miners. To be closed only after additional units arrive on site).
Dec 2018_019	Construction of Parawi-Koobi haul road	A PS5 -compliant Resettlement Action Plan is required for the Kankalaré residents affected by the Parawi-Koobi haul road.	Construction/ PS5 and ESAP	Prepare PS5-compliant RAP within timescale stipulated in Section 13 of the 09 November 2018 version of the Resettlement Action Plan.  As the timescale is short, CBG to accelerate the procurement of an external consultant to prepare the PS5-compliant RAP  Update Resettlement Policy Framework in near future.	<b>High</b> (increased to High because relocation almost completed and there is no PS5-compliant RAP in place)	<b>Open</b> (A final draft of the RAP, including an LRP, was issued in March 2021. Progress was delayed by COVID-19 Restrictions.  The revised and updated Resettlement Policy Framework is currently under Lender/IESC review)
Dec 2018_023	Telibofi and Parawi villages and returning/ relocating people/ households	A livelihood restoration programme for displaced people from the Kankalaré hamlets (including those considered to be vulnerable) is required by the Gap Analysis Report. Other villagers (acting as 'hosts' for non-natal individuals/household relocating to the	Operations / PS5	CBG to revise its risk analysis (relating to these two villages) by adding the risk of intra-community disharmony resulting from application of livelihood restoration measures to certain, but not all households in the villages. Specific measures may	<b>Moderate</b>	<b>Closed</b> (Superseded by events. The final version of Kankalaré RAP now includes an LRP. Preparation of the RAP+LRP involved community

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in March 2021)</b>
		village) will not be entitled to participate in this programme if they had no affected assets. This could cause intra-village social tensions.		need to be formulated and applied to manage any additional risks, as necessary.  CBG to consider risk of social tensions and if assessed as being likely to occur consider extending livelihood restoration measures to all villagers.		consultation and no sign of incipient conflict was noted.)
Dec 2018_025	GIS Mapping	Development of a comprehensive and detailed GIS Ecological and Community Constraint Maps.	PS6	A GIS database has been initiated however a comprehensive and detailed GIS Ecological and Community Constraint Maps need to identify important biodiversity features, exclusion zones, Critical Habitat and rehabilitation areas. A separate map should show community ecosystem services, incentivised areas, problem areas.	<b>Low</b>	<b>Closed</b>  (IESC received live demonstration of CBG's in-house GIS capabilities).
Dec 2018_028	Social and Biodiversity cooperation	Community matters impacting Critical Habitat	PS6	CBG should further its current efforts to ensure greater cooperation between the Biodiversity and Social teams in order to address issues which arise and impact on both people and/or Threatened species and Critical Habitat and wider biodiversity issues.	<b>Moderate</b>	<b>Closed</b>  (Better collaboration noted in general and also there is a landscape level plan in place that integrates community development and biodiversity objectives)
Dec 2018_029	Boullère/COBAD Road river crossings	Exposed riverbanks caused by excavation/construction works.	PS6	Rehabilitation efforts should continue, to ensure that silty run-off does not occur in the wet season, when further excavation/construction activities are	<b>Moderate</b>	<b>Open</b>  (IESC wishes to reserve judgement until an 'in



<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in March 2021)</b>
				scheduled as part of the restoration of riverbank profiles.		person' site visit can be performed)
Feb 2018_020	Security of tenure for Hamdallaye villagers	Provision of confidence to Hamdallaye villagers that they will not be relocated again.	Construction	Dissemination of reasons, to Hamdallaye residents and Advisory Committee, which explain why relocation will not occur again. Recording of agreements (in the form of a meeting Minute ( <i>Procès Verbal</i> )).	<b>Moderate</b>	<b>Open</b> (To be checked in next CBG/IESC/PLs Technical Resettlement Ccall or during next IESC site visit)
Feb 2018_029	Plateau-by-plateau management units / Rehabilitation Plan	Landscape planning for rehabilitation	All / PS6	The 2018-2023 rehabilitation plan does not set out the decision-making process required to define the most appropriate vegetation restoration technique. This detail has yet to be incorporated into the plateau-by-plateau management tool and is essential to ensure that the needs of local communities and for the restoration of natural (and critical habitats) are balanced.	<b>Moderate</b>	<b>Closed</b> (a new 5-year rehabilitation plan has been developed)
Feb 2018_036	West African Red Colobus	The West African Red Colobus occurs on an island located between CBG's North Cogon concession and COBAD.	All / PS6	Make best endeavours to influence and support COBAD to implement appropriate mitigation measures to protect the habitat for this species.	<b>Minor</b>	<b>Open</b> (Progress made. CBG undertook monitoring studies for the species on the island in 2018 and 2019 and the results will be used to develop a management plan for discussion with COBAD).

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July 2017 _029	Access to school for pupils of Kankalaré hamlets and Telibofi	At present pupils from these communities attend Hamdallaye school. Once the village is relocated – the distance to school will be increased significantly.	Construction	Consider ways of ensuring that school enrolment and attendance by children of Kankalaré hamlets and Telibofi does not decline due to relocation of the Hamdallaye school.  Select and implement the preferred option so that no disruption to attendance occurs.	<b>Moderate</b>	<b>Closed</b>  (The Kankalaré RAP requires a school to be built at Niangaba, near Telebofi. Construction is expected to begin in March 2021)
July 2017 _035	Land Disturbance Permit	Land Disturbance Permit (LDP) proforma does not systematically capture all BMS requirements.	All	Update proforma.  HSEC team to monitor uptake of the LDP Procedure by CBG operations and record any instances of works not covered by a LDP.	<b>Minor</b>	<b>Closed</b>  (following receipt of the Plateau-by Plateau reference document).
July 2017 _038	COBAD Road	Restoration of river crossings yet to be initiated and no clear identification of responsible party to complete the works. Significant risk from sedimentation into gallery forest and watercourse critical habitats.	All	A restoration plan for the rivers needs to be developed. The responsible party to complete the works need to be identified and the budget made available.  Liaise with COBAD over works required to prevent sedimentation into gallery forest and watercourses.	<b>High</b>	<b>Open</b>  (Issue to be revisited during next IESC monitoring visit before closing).