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International Finance Corporation; Overseas Private Investment 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 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.

Date

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1700001699

CBG BAUXITE MINE EXPANSION ENVIRONMENTAL AND SOCIAL MONITORING REPORT - FEBRUARY 2018

**CBG BAUXITE MINE EXPANSION
ENVIRONMENTAL AND SOCIAL MONITORING REPORT
- FEBRUARY 2018**

Project No. **1700001699**
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 Date **May 2018**
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Status of Issues Identified in Preceding Monitoring Visits

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GLOSSARY OF TERMS/ ACRONYMS

Acronym	Abbreviation
BAP	Biodiversity Action Plan
BMS	Biodiversity Management System
CBG	Compagnie des Bauxites de Guinée
CFB	Chemin de Fer de Boké
CFP	Chance Finds Procedure
CHMP	Cultural Heritage Management Plan
CHSMP	Community Health and Safety Management Plan
CR	Community Relations
CTA	Common Terms Agreement
DMP	Dredge Management Plan
EEM	CBG's Environmental and Social (E&S) Consultants
EHS	Environmental, Health and Safety
EPCM	Engineering, Procurement, Construction Management
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
E&S	Environmental and Social
ESMP	Environmental and Social Management Plan
H&S	Health and Safety
HSE	Health, Safety and Environment
HSE&S	Health, Safety, Environment & Social
HSEC	Health, Safety, Environment and Communities
HSEC MS	Health Safety Environment and Communities Management System
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
KBA	Key Biodiversity Area
LDP	Land Disturbance Permit
LTI	Loss Time Incident
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan
MMOs	Marine Mammal Observers
MoC	Management of Change
MS	Management System
MSDS	Materials Safety Data Sheets
NPIVP	Net Positive Impact Verification Panel
OHS	Occupational Health and Safety
OPIC	Overseas Private Investment Corporation
PAP	Project-Affected Person
PPE	Personal Protective Equipment
PS	Performance Standard
Ramboll	The company fulfilling the role of IESC
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
RN	Route Nationale
SEP	Stakeholder Engagement Plan
SMP	Security Management Plan
WBG	World Bank Group
WWT	Waste Water Treatment

EXECUTIVE SUMMARY

In February 2018, Ramboll Environment and Health UK Ltd (Ramboll), acting in the role of Independent Environmental and Social Consultant (IESC) with a duty of care to Lenders¹, visited the Compagnie des Bauxites de Guinée (CBG) bauxite mine in Guinea to monitor the environmental and social performance of the Expansion Project.

The February 2018 visit followed the second monitoring visit by Ramboll (Ramboll is used interchangeably with IESC hereafter) which occurred in July 2017. During the February 2018 visit, Ramboll was joined by representatives of the Policy Lenders, namely representatives from the International Finance Corporation (IFC) and UFK². The same three-person team from Ramboll, which undertook the previous monitoring visits, assessed CBG's Health, Safety, Environment & Social (HSE&S) performance associated with: The Expansion Project (construction); ongoing operations; and to a more limited extent, revisited elements of the construction/forthcoming use of the COBAD Haul Road located within CBG's concession. During the monitoring visit, emphasis was given to:

- The implementation of the Expansion Project's Environmental and Social Action Plan (ESAP);
- The adequacy of the HSE&S Management System(s);
- Performance of CBG's main contractors working on the Expansion Project;
- The implementation of a suite of environmental and social management plans intended to address applicable Project Standards, notably the IFC Performance Standards; and
- Follow-up on those issues identified during the July 2017 site visit and presented in the subsequent report.

Specific elements of HSE&S performance were prioritised for review prior to the trip. Other elements that were addressed during preceding visits, without significant concerns being raised, were not revisited on this occasion.

At the time of the monitoring visit, there was no community unrest within Project-affected communities and therefore no constraints preventing the Ramboll team from visiting/meeting with community stakeholders. Throughout the monitoring process, CBG cooperated fully and responded to all Ramboll's requests in relation to the monitoring effort.

The findings presented in this report should be incorporated within CBG's assurance programme(s), with documentary evidence of corrective actions and close-out of issues provided periodically. The IESC will undertake desk-top review of subsequent documentation and, also, undertake a further monitoring visit in Q3, 2018 during which the current outstanding ESAP items will be considered, the issues identified in this report will be revisited and the progress in addressing the issues confirmed.

The monitoring visit covered a broad range of health, safety and environment and social matters. CBG has a large team of Health, Safety and Environment and Community Relations specialists that are working to satisfy the requirements of the ESAP; however, despite considerable efforts, there remains work to be completed. A total of 37 findings were identified during the monitoring visit. Of these 6 are considered High; 23 are Moderate and the remainder considered to be of Minor significance. The High findings relate to the timing/urgency/compliance of necessary actions as follows:

- 1 Certain management plans need further effort to make them actionable/operationalised. In general, management plans require 'ownership' by CBG and further specificity relating to:

¹ Lenders as defined on the cover page of this report.

² OPIC decided not to participate in this monitoring visit

implementation of measures/actions; designation of responsible parties; prioritisation of actions; and senior management and budgetary approval. The IESC understands this level of specificity will be provided within Actions Plans prepared to accompany the management plans - such Action Plans need to be an integral part of the management plans.

- 2 A framework Emergency Response Plan (ERP) has been prepared; however, as of February 2018, no updated, topic-specific ERPs have been provided. Consequently, the requirement of the ESAP (operationalised ERPs by June 2017) has not been satisfied. The IESC understands revised ERPs are expected to be completed in May 2018.
- 3 There has been an additional delay to the date for relocation of Hamdallaye village (put back to a time period in Q1/Q2 of 2019 (from November 2018). It is now very important that: mobilization of CBG's delivery partner/s begins as soon as possible, and the initiation of infrastructure/housing construction and the implementation of the Livelihood Restoration Programme Action Plan is undertaken, also, as soon as possible once mobilization is completed. Implementation of 'Quick Impact Projects' during the period of Action Plan preparation is a priority to ensure that villagers see 'concrete' results from CBG's livelihood restoration actions.
- 4 Mine-related operations in the near future requires relocation of the inhabitants of certain of the Kankalaré hamlets in 2018 and thus swift action is needed to prepare the Resettlement Action Plan (RAP), as required by the ESAP ("....for those project-affected people to be resettled during 2018"); however relocation is scheduled for March 2018 and there is not a compliant RAP in place.
- 5 The Resettlement Policy Framework (RPF) states that cash compensation will be provided for land acquired by CBG. However, in practice CBG has not compensated for loss of land and there is a contradiction between stated CBG 'policy' commitments and actual practice during the resettlement of Hamdallaye. This has the potential to result in financial (CBG) and reputational (CBG and Lenders) risks. CBG needs to clarify its legal obligations under national law (essentially, the 1992 Land Tenure Code) and its loan agreements, and review its current practice regarding compensation for land take. Based on the outcome of this review, CBG must take immediate action to fully align its stated and disclosed 'policy' commitments with its actual practice. Should this alignment of 'policy' and practice require amendment of the RPF, then the amended policy must be disclosed. Also, should this alignment result in a change of practice, then compensation for all land acquired since the approval of the RPF must be implemented retrospectively, in a manner that meets national and PS 5 requirements. *Post visit note: Since the site visit, CBG has informed the Lenders that it intends to offer land-for-land (expected to be reclaimed mine land) in line with PS5 where possible. When this option is not possible, then an appropriate form of financial compensation, compliant with PS 5, will be provided. CBG's compensation related documentation should be updated to reflect its stated position.*
- 6 The Biodiversity Manager is approaching the end of his 2-year contract. CBG need to ensure that contract is either extended or that transition and recruitment is carefully managed to ensure continuity.
- 7 CBG plans to manage mining activities on a plateau-by-plateau basis, defining plateau specific management plans drawing from other discipline-specific management plans. The integration of biodiversity constraints into the mining plan has started, but key aspects are delayed or awaiting other studies (e.g. Water Management Plan). The development of plateau-by-plateau management units is a priority and, subsequently, need to be updated as soon as additional information becomes available from other studies to ensure adequate protection is provided particularly to springs, watercourses and chimpanzee hotspots.

1. INTRODUCTION

Ramboll Environment and Health UK Limited (Ramboll), previously Ramboll Environ UK Limited, was commissioned in September 2016³ by Compagnie des Bauxites de Guinée (CBG) to undertake environmental and social monitoring of the 18.5MTPa Mine Expansion Project (the 'Project' or '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, International Finance Corporation (IFC), Overseas Private Investment Corporation (OPIC) and UFK (together the 'Policy Lenders'), and a consortium of commercial banks (collectively with the Policy Lenders referred to as the 'Lenders').

This report provides the findings following the February 2018 monitoring visit (also referred to interchangeably as an audit) with respect to the Expansion Project that has included an assessment against applicable Project Standards, specifically, IFC Performance Standards and applicable World Bank Group (WBG) Environmental, Health and Safety (EHS) guidelines, thereby identifying any environmental and social risks associated with the Project's realisation.

Ramboll visited CBG's mining facilities and the Expansion Project facilities. Face-to-face interviews were held primarily with CBG (on occasion, supported by personnel from EEM, CBG's Environmental and Social [E&S] consultants for the Expansion Project) consisting of:

- Senior Managers;
- Health, Safety and Environment (HSE) Team;
- Biodiversity Team;
- Community Relations (CR) Team;
- Resettlement Manager; and
- Asset Protection Advisor (responsible for security).

Meetings/in field discussions were also conducted with key Expansion Project Contractors, including Fluor (the Engineering, Procurement, Construction Management [EPCM] Contractor) and the main Expansion Project Construction contractors, Tecnasol (excavation of the crusher pit) and Takraf.

A team of three from Ramboll, comprising of Chris Halliwell, Peter Burston and Ron Bisset and accompanied by E&S specialists from IFC and UFK, travelled to Guinea to assess CBG's progress towards meeting the requirements of the Environmental and Social Action Plan (ESAP) and the various management plans referenced therein, and more broadly CBG's overall HSE and Social (HSE&S) performance. The same team from Ramboll had previously visited the CBG concession in July 2017 and November 2016 and was therefore already familiar with the Expansion Project and CBG's ongoing operations. Therefore, Ramboll has largely concentrated its efforts on construction activities associated with the Expansion Project, whilst also following up on issues raised following the July 2017 visit. More specifically, the trip presented Ramboll with an opportunity to:

- Re-visit the Sangarédi mining facilities;
- Re-visit the Expansion Project construction areas (excavation of the primary crusher pit and mineral quay extension) and gain a good appreciation of ongoing construction activities at the mine and port areas;

³ Ramboll had previously been commissioning to undertake the original Environmental and Social Due Diligence and was reappointed in September 2016 for the IESC monitoring role.

- Meet with CBG's main construction contractors for the Expansion Project;
- Visit key sensitivities within the concession including critical habitats and villages that will be relocated or experience economic displacement;
- Assess the effectiveness of oil spill response capability following a release of oil;
- Participate in face-to-face interviews with the Health, Safety, Environment and Community (HSEC) team members including individuals tasked with leading on;
 - Biodiversity;
 - Health & Safety (H&S);
 - Social issues, specifically stakeholder engagement and involuntary resettlement;
 - Finance;
 - Security;
 - Emergency response planning; and
 - Environmental monitoring;
- Inspect certain sensitive locations along the COBAD Road (previously the entire route had been viewed).

The IESC team spent 4 days on site viewing mining and auxiliary activities around Sangarédi, the COBAD Road and rail transfer yard, within the CBG concession area, and the bauxite processing facilities at Kamsar. Visits were also made to locations of interest including the 2 villages (Hamdallaye and Fassaly Foutabhé) which are experiencing involuntary resettlement-related actions associated with the Expansion Project. In these 2 villages, formal meetings were held with the *chef du village* (there is one *chef du village* for both villages), elders and community members. The new Hamdallaye village site and the proposed route, to be used by villagers, to access the agricultural lands in the Démourou valley were visited. Also, the site of the *hameaux* of Kankalaré⁴ was observed from the Route Nationale 3 (RN 3)⁵ and a meeting with CR team personnel and the Resettlement Manager was held, on-site, to discuss the impending relocation of the inhabitants and the process undertaken, to date, with respect to consultations and compensation. No meeting with Kankalaré inhabitants occurred. In addition, visits were made to sites of works underway to improve and ensure continuing motorable (at least by motorcycles) access between the settlements of Boulléré and Fassaly Foutabhé and the RN 3. Meetings and joint field visits were made with Sylvatrop Consulting, who have started a 2-year biodiversity monitoring programme and initial community forest conservation programme. Restoration of mine sites was a focus of the site visits that included recently restored areas of the former COBAD road alignment and a community tree nursery. Finally, a reconnaissance visit was made to the COBAD rail transfer yard and, also, a stretch of the COBAD road, from the rail transfer yard toward the COBAD concession boundary. The full site visit itinerary is provided in Appendix 1.

Throughout the site visit the Ramboll team were granted full access to all facilities/sites and received full cooperation from the HSEC team. CBG provided all necessary vehicles with drivers and HSEC team members to escort the IESC and Policy Lenders. The Ramboll team (and Policy Lenders) therefore split on several occasions to focus on the team members' disciplines, namely, environment (excluding biodiversity), social and biodiversity. This report presents key visit findings in sections which use the IFC Performance Standards, that cover the issues investigated during the monitoring visit, as headings. The report makes extensive use of photographs taken during the site visit.

⁴ 'Hamlets' in English. There are 3 '*hameaux*': Kankalaré 2, Kankalaré 3; and Paragogo; known collectively as Kankalaré.

⁵ The RN 3 is the national road from Conakry and Boké to Sangarédi.

This site visit report focuses on the observations made during the site visit; however, it also refers to earlier reviews and reports where necessary reflecting the ongoing nature of ESAP deliverables and Ramboll's review work.

2. SCOPE AND STRUCTURE OF THE REPORT

2.1 Scope of the monitoring visit

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 IFC Performance Standards and Project E&S commitments.

This report details the Project's compliance with the applicable Project Standards, and in doing so, presents E&S risks associated with the Project. It has been prepared for the attention of CBG and Lenders.

The report presents the findings of the audit based on information gained following:

- A review of ESAP implementation;
- A review of certain HSE&S Management System documentation;
- Interviews held with key HSEC staff within CBG;
- Interviews with other CBG functions including a security representative;
- Interviews held with Contractor's HSE representatives and Construction Managers;
- Visit to new Hamdallaye village site and access to the Démourou valley, COBAD Road and rail transfer yard, rail maintenance workshop and other sites in the concession area; including meetings in 2 villages to discuss involuntary resettlement issues;
- Visit to various locations within the concession of high biodiversity value (i.e. critical habitat); restored mining areas, former COBAD road alignment, a community tree nursery and mangrove areas close to Kamsar; and
- Visual observations made during walkover inspection of Expansion Project and Operations facilities.

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

2.2 Summarised itinerary

The site visit was undertaken between 19th and 23rd February 2018. The tasks performed during this period are summarised below and detailed in the audit itinerary (Appendix 1).

19 th February	Travel to Guinea
20 th February	Opening Meeting Office based discussions (ESMP integration, Water management, RAP, Biodiversity Management Plan (BMP) implementation, plateau-by-plateau concept)
21 st February	Inspection of Kamsar facilities, visit to oil spill area (environment team) Mining areas/COBAD Road – resettlement and access (social team) Mining areas/COBAD Road - biodiversity management, biodiversity monitoring programme, community tree nursery, reinstatement area, water management (biodiversity team)
22 nd February	Discussion about management plans (environment team) Resettlement and access (social team) Mining area - Visits to sensitive biodiversity receptors (biodiversity team) and Kamsar

Close out meeting (all)

23rd February Wrap up meetings (environment and social) and visit to mangroves and oil spill area (biodiversity)

Meetings/interviews with CBG representatives primarily concerned the management and monitoring of the following Project HSE&S aspects:

- Emergency response planning;
- Water;
- Waste;
- Biodiversity;
- Management of change procedure;
- Current physical relocation and livelihood restoration planning; including past compensation measures and grievances close-out;
- Environmental monitoring programme;
- Stakeholder engagement/Grievance Mechanism;
- Occupational Health and Safety (OHS) plans and procedures;
- Security provision;
- Community Safety (railway safety); and
- Cultural heritage (including Chance Finds Procedure).

Meetings were also conducted with the Fluor, the EPCM Contractor and the main Expansion Project Construction contractors, Tecnasol (excavation of the crusher pit) and Takraf.

2.3 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 Performance Standards (2012) including:
 - 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 Environmental Health & Safety (EHS) Guidelines applicable to the Project.

PS7 (Indigenous Peoples) was excluded from the scope of the monitoring visit on the basis that the Environmental and Social Due Diligence performed prior to financial close concluded no Indigenous Peoples are affected by the Project.

2.4 Structure of the report

Section 3 provides a description of the 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 Performance Standards applicable to the Project as listed above. The key issues identified during the audit and IESC recommendations to address issues are summarised in 'significance tables' for each Performance Standard.

Appendix 3 provides a status update for the summary issues identified in the previous July 2017 monitoring visit. The status of previously-identified issues is categorised as either:

- Closed (with an explanation of why an issue has been closed);
- 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 the report, and the previous issue from July 2017, as listed in Appendix 3, will include a reference to the updated summary text in the main body of the report).

Within this report, we have endeavoured to provide a balanced opinion, providing examples of good practice. However, due to the nature of a compliance report, and the broad range of aspects covered, and for the sake of brevity, the report is focused on areas for improvement.

2.5 Limitations

At the time of the visit, construction in Kamsar was well underway. Ramboll experienced no constraints in its ability to inspect all construction areas/activities.

Ramboll only considered activities relevant at the time of audit based on ongoing Project activities/activities and those planned for the near future. Previous issues, including detailed review of management plans, have been reported elsewhere and future activities will be the subject of forthcoming monitoring visits.

3. PROJECT STATUS

This section provides a brief description of the Project activities ongoing at the time of the visit.

3.1 Status of the Expansion Project at time of the audit

At the time of the audit construction of the Expansion Project was well underway with 1,472 construction personnel on site [as of 24 February 2018]. Key activities are as follows:

- Workers' accommodation completed;
- Primary crusher and conveyor trench – diaphragm wall closed, all ring beams have been completed and the exit trench constructed. (Appendix 4, photos 2, 3 and 5);
- Handover of the crusher pit from Tecnasol to Takraf in December 2017;
- Foundations for the wagon positioner in place;
- Foundations in place for the secondary sizer and first-level platform completed and second platform in progress;
- Foundation for the new dryer 95% complete and dryer parts on site;
- Mineral quay – all 148 piles installed and jetty largely complete (Appendix 4, photos 14 - 15);
- Railway sidings – good progress being made with Tanené and Boké completed;
- Hamdallaye (new) – planning for access route to Démourou valley; continuing preparation of area of site to be used for agriculture including the planting of an area of cashew trees (already allocated to individual households), planning for additional tree planting (as the 2017 acacia tree planting campaign was not successful) and for construction of infrastructure and houses in Q1 2018; and
- Fassaly Foutabhé – continuing work and planning for the new school and new route for access to the RN 3.

At the time of the visit it was estimated that approximately 54% of the Project was complete [based on 51.3% construction and 99.9% of engineering completed].

Figure 1: Construction at the crusher pit and secondary sizer (courtesy of CBG)



Figure 2: Crusher pit and conveyor trench (courtesy of CBG)



4. SIGNIFICANCE ASSESSMENT

4.1 Review findings

A summary of the review findings is presented in a significance table at the end of each section. For each item, we present:

- The topic/aspect;
- A description of the issue, for example deficiencies or omissions;
- The phase(s) to which an issue relates;
- Identification of the standard(s) against which the deficiency has been identified;
- Ramboll's recommendation, where applicable, to resolve/manage the deficiency; and
- The significance on a three-point scale (see below for criteria).

4.2 Assessment of significance

A ranking system has been used to indicate the relative significance of an issue identified during the monitoring visit. As well as highlighting the most important areas requiring attention, it can also be used to aid the tracking and rectification of specific items requiring improvement.

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.

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 Item is noteworthy, but it is not an issue of non-compliance.

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

Table 4-1: Example of the summary table format

ID	Aspect	Issue Description	Phase ⁶	Standard	IESC Recommendations	Significance
00	Storm water run-off – monitoring	The ESAP requires <i>Company X monitors the quality of surface water run-off from facilities.</i>	Ops	WBG EHS Guidelines ESAP	<i>Company X shall Expedite procurement of monitoring equipment with the support of senior management.</i>	Moderate

⁶ Phases can include: construction; operations; decommissioning or; any combination of these phases.

CBG Bauxite Mine Expansion

ID	Aspect	Issue Description	Phase ⁶	Standard	IESC Recommendations	Significance
		To date the Company has been unable to procure monitoring equipment – no monitoring has been undertaken.				

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

5.1 Management systems

Ramboll reported that CBG operations had obtained ISO14001, ISO 9001 and OHSAS 18001 certification in 2017. No further commentary is provided in this report.

5.2 HSEC responsibilities and resources

5.2.1 HSEC Manager

In July 2017, Ramboll reported that the position of HSEC Manager was vacant and that the vacancy was distracting other members of the HSEC team. The position has since been filled with a replacement HSEC Manager in post since November 2017.

Following the commissioning of the Expansion Project facilities it is expected that the HSEC team might be restructured. This was not discussed during the recent site visit, however according to comments received from CBG subsequent to the site visit, the Company is already engaged with the restructuring process. This issue will be considered further during the next monitoring visit.

The Project has contractual requirements for contractors to ensure a minimum HSE representative to worker ratio of 1:50.

5.2.1 Community Relations

The CR team remains stable and effective under the leadership of the CR Manager. In Q3 and Q4 of 2017, the CR team has been assisting Chemin de Fer de Boké (CFB)⁷ with compensation for asset loss and the associated community disclosure and consultation activities with respect to the Multi-User Agreement (MUA) Rail Project. This work has continued into 2018 and is being done with no extra staff. This has caused some challenges to the CR team's ability to manage all its responsibilities, but to date it appears to be coping well. The adequacy of the CR team's staff complement will be a focus of the next IESC monitoring visit in Q3 2018.

5.3 Environmental and Social Impact Assessment

During the July 2017 site visit, Ramboll was made aware of additional work being done to prepare an Addendum to the original Expansion ESIA Report. The Addendum is required to assess the impacts of mining activities in the south-east of the concession, which is required to meet the required bauxite production rates, following a delay in the financing process.

Dates for the delivery of the Addendum were not agreed, however it was anticipated the Addendum would be available in late October 2017. As of February 2018, the Addendum had not been made available to Policy Lenders/the IESC. The extent to which the findings of the Addendum will influence CBG's management plans is not yet known.

5.4 Environmental and Social Management Plan (ESMP)

The original ESAP included a requirement to '*Update the ESMP to include the existing CBG operations, the Phase 1 Expansion and any future expansions*' by 31 March 2018. To meet this timeframe CBG has requested support from EEM. Ramboll was informed that EEM had undertaken a gap analysis between 23 May-23 June 2017 comparing CBG's Operations with the ESMP for the Expansion Project. EEM reported that many of the system elements are in place,

⁷ Chemin de Fer de Boké is the arm of CBG that operates the railway line and transport of bauxite by rail from Sangarédi to Kamsar.

but also identified several gaps and categorised these by magnitude⁸ and that it was in the process of upgrading CBG's existing management system (MS).

The timeframe for this ESAP deliverable was revised with Lenders consent in late 2017. The revised timeframe requires integration of CBG operations by end of June 2018, with a three-month period for review by the IESC/Policy lenders and sign-off planned for end September 2018.

During the site visit EEM presented the approach. The approach was high-level and consistent with standard practice for the implementation of management systems. However, the following comments/observations are made:

- CBG Operations have an existing Integrated Management System (IMS), although this IMS is strongly biased towards quality management;
- There was little reference to the earlier gap analysis (described above), giving the impression that previous work was not being utilised and that little progress has been achieved since the July 2017 site visit; and
- The presentation provided referred to a HSE Management Plan. The IESC recommends social aspects are included within a HSE and Communities Management Plan.

The IESC further recommends development of an ESMP framework document (sometimes referred to as the HSEC Manual) as a priority to provide an overview of the MS (scope, objectives, resources⁹, applicable standards, main elements of the MS and signposting to associated management plans etc.) that could be reviewed, along with any gap analysis, by the IESC.

As indicated in the preceding monitoring report, and reinforced during meetings in February 2018, CBG should also provide a 'cost of implementation' to Policy Lenders for the ESMP update due for completion date by 31 March 2018 (ESAP item). Furthermore, IFC also requested an outline budget for CBG's alignment (full implementation) of the HSEC MS for existing operations with HSEC MS for the Expansion Project, as required in the ESAP (by 2024). In effect, Policy Lenders require a 5-year plan outlining: i) current status; ii) where CBG aims to be by 2024; and iii) how CBG will get to where it wants to be (with indicative costs), for example, its management of stack emissions.

5.5 Expansion Project management plans

A number of management plans were discussed during the IESC's visit. The specific plans are discussed in more detail under the relevant discipline headings in Chapter 7, however as an overall finding it is the IESC opinion that certain plans contain background information more often associated with ESIA chapters and include suggested actions/recommendations to CBG made by its consultant EEM. Whereas the information provided is useful, the focus of the plans should be on practical implementation of management measures. Thus, plans need further effort to make them actionable/operationalised, requiring:

- **DETAIL** - Greater instruction regarding required actions/implementation of mitigation measures;
- **RESPONSIBILITY** - Identification of secondary responsible parties (not just the HSEC Manager);
- **CBG OWNERSHIP** - Greater coordination and sign-off by CBG HSEC team and CBG Senior Managers. It is CBG that will be responsible for the implementation of the plans and therefore

⁸ Results of the gap analysis indicate 6 small, 15 medium and 8 large gaps.

⁹ CBG should present an organogramme outlining the proposed team structure during operations within the HSEC MS framework document.

critical that CBG is fully involved in the development of the plans. CBG HSEC team members should work closely with EEM to ensure the measures defined by EEM are realistic i.e. CBG to ensure measures defined in the plans meet with CBG's objectives and that it has the resources/budget/ability to implement measures;

- **PRIORITISATION** - Prioritisation (key issues/objectives) and realistic timeframes (based on internal budgeting) recognising the 2024 deadline for full alignment with intent of the IFC PSs;
- **APPROVAL** - Sign off by CBG HSEC team and Senior Managers (providing confidence it will happen).

The aim should be to ensure that the plans can be used by others in the event of personnel changes and that the plans are auditable.

Post visit update: CBG has stated that it will develop a series of 'Action plans' to complement each management plan following the IESC's/lenders' approval of management plans. At the time of writing this approach is under discussion.

5.6 Stakeholder engagement

The Action Plan for Community Consultations and Sensitization for the period 2017 to 2018 is still being implemented. Detailed planning for the final phases is underway. Emphasis will be given to the following topics; the community grievance mechanism; biodiversity and community investment. CR personnel are undertaking stakeholder engagement on 3 fronts: CBG Operations; the Expansion Project (in particular, the Parawi Project with its resettlement implications – see Section 9.7), and also the Multi-User Rail Agreement (MUA). As mentioned above, the latter is a significant commitment in staff time and resources that is posing a challenge to the CR team in terms of adequately providing the required/necessary level of engagement on all of these 3 fronts.

5.7 Grievance mechanism

CBG has continued to develop and expand its ability to manage community grievances effectively. It continues to track these grievances and is now able to present more details on the grievances, for example, it now reports on the numbers of the different types of grievances received for each year (there is list of grievance types and each grievance is allocated to the appropriate type following its receipt).

As recorded in the IESC's July 2017 Monitoring Report, CBG had developed and maintains a grievance register. This register has been supplemented by an additional register which focuses on community concerns/issues/suggestions (*doléances et préoccupations*). This is an important initiative as it formalizes and embeds one aspect of CBG's interactions with its community stakeholders; namely dealing with those concerns/issues/suggestions, raised by community and local government stakeholders, that are not grievances, but which might escalate to the level of a grievance if not addressed, adequately, within a reasonable time period. A section of this register is shown in Figure 3.

Figure 3: Section of register for community concerns/issues/suggestions

REGISTRE DE SUIVI DES DOLEANCES ET PREOCCUPATIONS COMMUNAUTAIRES											
En Date du : 13 fevrier 2018											
Code ID de la consultat	N°	Date de la Demande	Doléances Exprimées	Partie prenante concernée	Situation de la doléances	Priorité de la doléance	Responsable	Statut	Date enclenchement	Date d'exécution	Commentaires
<i>Rapporter le Code ID de la consultation ou indiquer la nature de la demande</i>		<i>Date à laquelle l'engagement a été pris. (Cette date correspond généralement à la date de la</i>	<i>Transcrire la question ou la demande d'information formulée au moment de la consultation mais qui n'a pas pu être répondue immédiatement (une ligne par question ou demande)</i>	<i>Inscrire le nom de la partie prenante (individu, village, association, groupement, etc.) qui a posé la question et qui attend la réponse</i>	<i>Inscrire si la doléances est acceptée, orientée, refusée ou en cours de traitement</i>	<i>Etablir un code de priorité de couleur (rouge=urgent, orange=important, vert=non critique)</i>	<i>Qui est la personne chez CBG qui est responsable de préparer une réponse aux parties prenantes?</i>	<i>Fait, en cours ou en retard</i>	<i>Indiquer la date à laquelle le processus est enclenché</i>	<i>Indiquer la date d'exécution de la doléance</i>	<i>Ajouter des commentaires au besoin.</i>
151023	1	23/10/2015	L'implantation des panneaux de signalisation indiquant la traversée des élèves à certains endroits de la route nationale.	District de Madina Borboof (secteur Madina Centre)/Kamsar	Acceptée		Manager Relations Communautaires	Fait	29/09/2016	01-Jan-17	Panneaux achevés et implantés
151023	2	23/10/2015	Demande la fermeture des carrières déjà exploitées par la CBG dans leur district	District de Madina Borboof (secteurs Madina Centre, kayenguissa)/Kamsar	Acceptée/plainte Communautaire		Manager Relations Communautaires	En retard	02/01/2015		Orientée vers le departement environnement CBG....
151023	3	23/10/2015	Demande la construction des doz-d'âne comme ralentisseurs pour réduire les accidents de la circulation	District de Madina Borboof (secteur Madina Centre)/Kamsar	Orientée						Communauté orientée vers les services déconcentré de l'Etat.
151023	4	23/10/2015	Demande de la réalisation des forages d'eau pour la communauté	District de Madina Borboof (secteurs Madina Centre et kayenguissa)/Kamsar	Orientée						Communauté orientée vers les autorités locales afin de mettre cette doléances dans le PDL
151023	5	23/10/2015	Demande l'aménagement d'un terrain de proximité pour les jeunes de Kayenguissa	District de Madina Borboof (secteu de kayenguissa)/Kamsar	Orientée						Communauté orientée vers les autorités locales afin de mettre cette doléances dans le PDL
151027	6	27/10/2015	Demande la fermeture des carrières déjà exploitées par la CBG dans leur district	District de Kawass/Kamsar	Acceptée/plainte Communautaire		Manager Relations Communautaires	En retard	02/01/2016		Orientée vers le departement environnement CBG....
151027	7	27/10/2015	Demande le reprofilage de la voie d'accès principale au village suite à sa dégradation par les camions de la CBG qui transportent la latérite	District de Kawass/Kamsar	Acceptée		Manager Relations Communautaires	En retard			Retard dû à la non disponibilité des équipements au departement construction auquel la doléance a été soumise

CBG has undertaken an analysis of community grievances for the period: 2015 to 2018 year-to-date. There has been a substantial decline in the annual number of grievances, from 45 to 5, over the period 2015 to 2017 (Figure 4). CR personnel consider that the introduction and implementation of the ‘disturbance permit (*permis de perturbation*)’ has played an important part in the reduction of community grievances, especially regarding the mine site. Actions taken following the issue of permits are less likely to cause community grievances; however, as indicated below in the discussion of economic displacement for Fassaly Foutabhé (Section 9.6), CBG actions can still cause local concerns (which may be submitted as grievances in the near future if not addressed speedily).

Most grievances relate to ‘economic’ (51) and ‘environmental’ (13) issues with employment and security being the next most frequent, but with low numbers overall (Figure 5). None of the 4 grievances registered in 2018 to date have been closed (Figure 6) and 4 grievances remain open from the period 2015 to 2017. Three (3) of the 4 ‘open’ grievances are long-standing (legacy grievances): one dates from 2015 and relates to failure to rehabilitate a quarry in Kamsar; two are from 2016 and relate to failure of rehabilitate quarries at Bintimodia and to damage to a water pump in Taïgbé (in Kamsar) and, also, disturbance (damage) to the head of the ‘Mirirè’ spring, Sangarédi.

Figure 4: Number of grievances by year: period 2015 to 2018 year-to-date

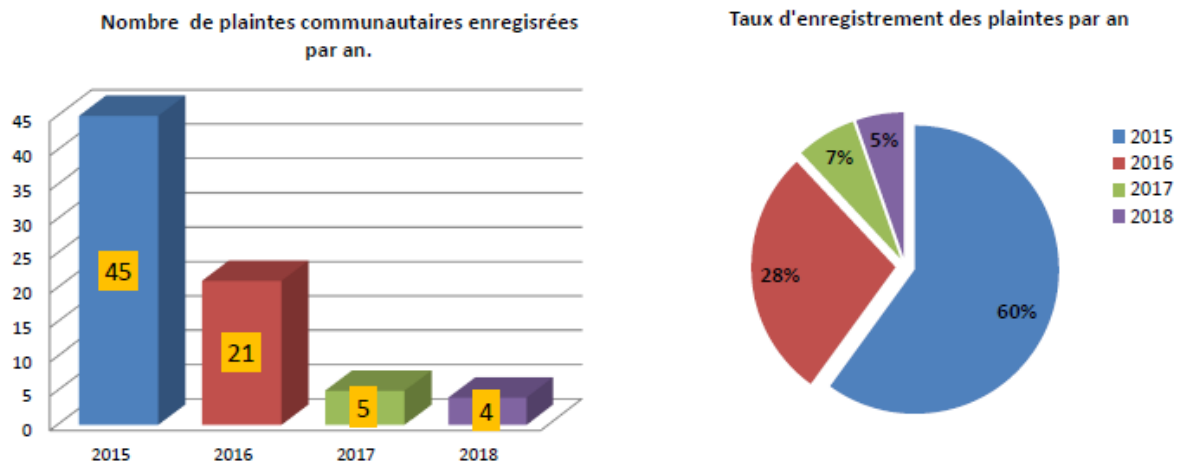


Figure 5: Numbers of grievance by type: 2015 to 2018 year-to-date

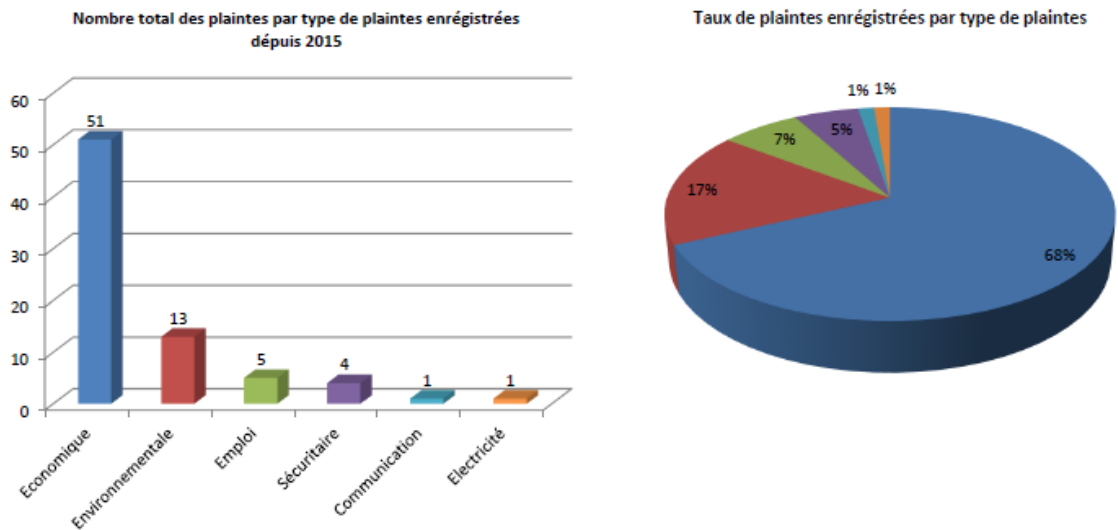
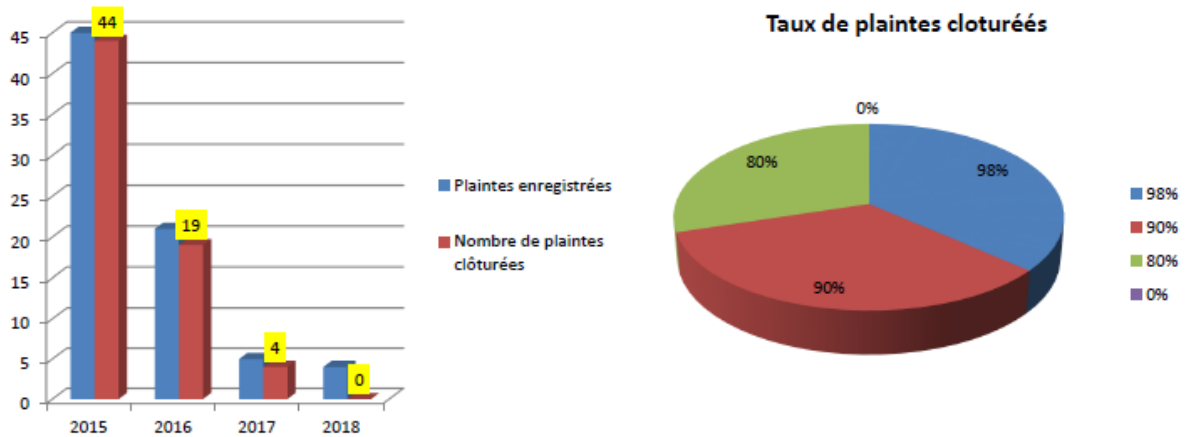


Figure 6: Grievances closed by year: period 2015 to 2018 year-to-date



5.8 Emergency planning

The ESAP includes the following 'Update and fully operationalise Emergency Response Management plans for all areas of influence' by 30 June 2017. In July 2017, Ramboll reported that an Emergency Response Plan (ERP) was delivered on schedule, however the document received was intended as a framework document and that operational plans will be developed at a later date.

During the February 2018 site visit, Ramboll was informed that responsibility for the development of operational ERPs is now the responsibility of the HSEC Team Leader with support from EEM. The ERPs are scheduled for May 2018 (See also Section 7.3, Oil Spill Incident).

Previously Ramboll recommended CBG should make use of the EPCM Contractor's ERPs, for example a Fluor ERP, which provides a guide to format, content and level of detail. According to CBG, it is currently completing its ERP with support from EEM, with finalisation anticipated by the

end of May 2018. According to EEM, the ERP will include an action plan to ensure that the ERP becomes an operational document that will be maintained moving forward.

5.9 Security Management Plan

Previously, the IESC provided comments on a (Rev0) Security Management Plan (SMP) provided for review on the 31st March 2017. During a meeting with the Security Manager in July 2017, the IESC was informed that the author of the SMP had left CBG. The IESC was also informed that the revised SMP would be available one month from the date of the July 2017 meeting. This revised SMP was not received by the IESC. However, during the February 2018 IESC monitoring visit, a revised SMP was seen and a meeting held with the author (see Section 8.2).

5.10 Management of change

The MoC Procedure is a direct requirement of the Lenders as specified in the ESAP. The Procedure was prepared by CBG and 'signed off' by the IESC in September 2016.

In July 2017, Ramboll met with the Fluor Construction Manager and HSE Manager to discuss Fluor's interaction with CBG with respect to the management of change. Whereas Fluor has its own procedures for managing change via Design Change Notifications, they informed Ramboll that it was unaware of CBG's MoC procedure and the HSE&S notification and reporting requirements specified in the Procedure that are placed upon Contractors. In February 2018, Fluor confirmed that had received the CBG MoC procedure.

During the February 2018 visit, Ramboll again met with representatives from Fluor and the CBG Cost Control Manager to discuss management of change for the Expansion Project. Ramboll understands Fluor tracks all changes with financial implications and works closely with CBG's Cost Control Manager in this respect. However, the HSEC team is not informed of changes unless the Cost Control Manager draws upon the HSEC team for support. Using this approach, the identification of changes with potential environmental and/or social consequences is reliant on the judgement of the Cost Control Manager. Ramboll is concerned that the Cost Control Manager does not have an HSE&S background and is not familiar with the commitments made in the ESIA and associated E&S Management Plans.

Ramboll understands the number of changes per week are relatively small. It is therefore recommended that a representative of the HSEC team (HSEC Manager) has sight of the proposed changes any opines on any E&S implications and subsequent reporting/notification of Lenders as per the agreed MoC procedure. The MoC procedure should also be updated to reflect current terminology i.e. clarify roles and responsibilities, such as who fulfils the role of 'Change Manager'.

Table 5-1: Summary of Findings, PS1

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance
Feb 2018 _001	ESIA	An Addendum to the ESIA is being prepared to assess the impacts of mining activities in the south-east of the concession, required to meet the required bauxite production rates, following a delay in the financing process. The extent to which the findings of the Addendum will influence the management plans is not yet known.	Construction / PS1	Timely completion of the Addendum is required to identify any implications to the current suite of management plans.	Minor
Feb 2018 _002	ESMP - integration of Operations	Limited progress since July 2017 towards the integration of the Expansion Project and existing Operations under a single management system.	Construction and Operations/ PS1 and ESAP	<p>CBG should work very closely with EEM in the development of a workable integrated MS i.e. it should be a collaborative approach led by CBG.</p> <p>The IESC further recommends development of an ESMP framework document (sometimes referred to as the HSEC Manual) as a priority to provide an overview of the MS (scope, objectives, resources, applicable standards, main elements of the MS and signposting to associated management plans etc.) that could be reviewed, along with any gap analysis, by the IESC.</p>	Moderate
Feb 2018 _003	Management plans	Certain management plans need further effort to make them actionable/operationalised.	Construction/ PS1 and ESAP	<p>In general management plans require ownership by CBG and further specificity relating to:</p> <ul style="list-style-type: none"> • Implementation of measures/actions; 	High

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance
				<ul style="list-style-type: none"> Responsible parties; Prioritisation of actions; and Senior management and budgetary approval <p>The IESC understands this level of specificity will be provided within Actions plans prepared to accompany the management plans.</p>	
Feb 2018 _004	Community Grievance Mechanism	Progress had been made towards to closure of legacy grievances, however a small number of legacy grievances (2015-2017) remain non-closed.	Construction / PS1	Close out all legacy grievances as a priority.	Moderate
Feb 2018 _005	Emergency planning	Based on a preliminary review of the Emergency Response Plan (ERP) provided on the 30 th June 2017, it is the IESC's opinion that the ERP is a framework document. As of February 2018, no updated ERPs have been provided. Consequently, the requirement of the ESAP, for operationalised plans (June 2017), has not been satisfied.	All / ESAP	<p>Expedite preparation of operationalised ERPs by:</p> <ul style="list-style-type: none"> Consider utilisation of Fluor ERPs; and Commissioning of specialist consultancy firm to produce the plans. Liaise with other departments – notably the Prevention Department and security advisor. <p>Revised ERP expected in May 2018.</p>	High
Feb 2018 _006	Management of Change	The MoC procedure should be modified to ensure HSEC department has sight of all proposed changes to opine on potential E&S implications, thereby triggering Lender reporting and notifications procedures as appropriate.	Construction / PS1, ESAP	The MoC procedure should be modified to ensure HSEC Team has sight of all proposed changes to opine on potential E&S implications, thereby triggering Lender reporting and notifications procedures as appropriate. Roles and responsibilities should also be clarified.	Moderate

6. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS

6.1 Introduction

There are two ESAP items pertaining to labour and working conditions: 1) relating to policies and procedures regarding employment practices and management of employees; and 2) design and manager of temporary workers' accommodation. Due to constraints of time, the IESC was unable to visit an accommodation block or interview a senior manager in the Personnel Department regarding the management of the workforce (such as terms and conditions of employment and the status of the workers' grievance mechanism).

6.2 Employment and employees

As recorded in the IESC's July 2017 Monitoring Report CBG submitted, on 31 December 2016, a range of documents in accordance with the ESAP requirement relating to management of employment /employees. The IESC and Lenders provided detailed comments stating that further work was needed and specifying a requirement for specific documents to be prepared and the necessary contents for these documents. Subsequently, CBG committed itself to preparing and submitting the required documents. During a meeting with the Director of Personnel (July 2017), the IESC enquired about progress in preparing the required documents and the expected date for delivery to Lenders/IESC. The IESC was informed that all the required documents would be submitted by the end of 2017. To date, these documents have not been received by the IESC.

6.3 Workers' accommodation

Given the status of the Expansion Project and the lack of any construction of new accommodation for the Expansion workforce; the IESC considers that it is unlikely that the situation regarding accommodation provision for workers has changed materially since the findings of the July 2017 IESC monitoring site visit. This conclusion, coupled with time constraints, meant that this issue is not revisited in this report.

The Worker Accommodation Design Plan (Rev0 of 2016/11/03) sets out the criteria and standards to be used to construct and manage worker accommodation. These are stated as being aligned with PS 2. In November 2016, the IESC submitted comments to CBG on the Worker Accommodation Design Plan (Rev0 of 2016/11/03). There is no specific mention, in the Plan, of the IFC/EBRD (2009) *Workers' Accommodation: Processes and Standards Guidance Note*; however, the Plan lists several specific requirements that have been taken from this document. The brief IESC inspection undertaken in July 2017 confirmed that the criteria and standards were being met. At the time of the site visit, CBG has not issued a Rev1 version of the Plan for IESC/Lender review.

6.4 Workers' grievance mechanism

A stand-alone Workers' grievance mechanism was expected, with other human resources-related documentation, to be submitted to Lenders/IESC by the end of 2017. As mentioned above, the IESC has not received the expected human resources-related documentation.

6.5 Occupational health and safety

6.5.1 Expansion Project

Ramboll was able to visit the ongoing construction works at the material jetty and the new crusher pit locations. Ramboll inspected the site during the previous monitoring trip, thus the purpose of this visit was to observe construction progress since the previous visit and, also, gain an appreciation of HSE management and performance of any new contractors.

As reported previously, Fluor continues to demonstrate a strong HSE culture and has a well-resourced HSE team. This culture is imposed on sub-contractors via contractual requirements, provisions of HSE plans and procedures and a rigorous audit and inspection programme.

Only a small amount of time was spent in the field, but nevertheless Ramboll noted many examples of good practice at the crusher pit and mineral quay including:

- Good use of Personal Protective Equipment including life jackets;
- Certification of equipment, for example, certificates for scaffolding;
- Use of harness when working at heights (Appendix 4, photo 5);
- Good signage and separation of active work areas/pedestrian areas; and
- Use of flag men (Appendix 4, photo 9).

Ramboll observed a number of ongoing tasks and randomly requested inspection of Permit to Work (PTW) documentation. The TAKRAF Site Manager was able to provide evidence of PTW documentation, including a Job Safety Assessment (JSA) and associated materials signed-off by Fluor in the event of a high-risk activity. Site personnel informed the IESC of daily toolbox talks and weekly audits. Lifting straps/slings are checked and colour-coded to help avoid use of uninspected/out of date equipment.

The IESC notes that a recent Loss Time Incident on the Expansion Project resulted in all construction works being halted in order to reinforce CBG's expectations with respect to safe working practices. Such measures demonstrate a strong commitment to health and safety.

6.5.2 Operations

No observations were made during this site visit. The IESC did however note that CBG has relaxed its policy on hand washing (introduced during the Ebola crisis).

Table 6-1: Summary of Findings, PS2

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/ Closed (IESC Opinion)
Feb 2018 _007	Human Resources documentation	The required documentation has not been submitted to Lenders/IESC.	Construction and Operations / PS2	Prepare, approve, disseminate (as appropriate) and implement the required policies and procedures regarding employment practices and management of employees.	Moderate	Open

7. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

7.1 Introduction

This chapter considers the management and monitoring of key environmental aspects associated with the Project and the Project's commitments to the prevention of pollution and resource efficiency with reference to topic specific management plans. Key aspects addressed in this report relevant to the Expansion Project and CBG's operations include:

- Water management;
- Management of oil spills;
- Waste management; and
- Environmental monitoring.

These are discussed in turn below along with a section dedicated to environmental management on the COBAD Road.

7.2 Water management

During the February 2018 visit, there was a discussion about the draft Water Management Plan (WMP). The ESAP includes the requirement for CBG to *'Develop and implement a Water Management Plan (WMP) based on comprehensive baseline data (boreholes, wells, surface / groundwater, storm water runoff) and including a water balance and surface / groundwater model which considers the quality, quantity and availability of water resources to local communities as a result of CBG operations and associated increases in population (eg in Kamsar). Monitoring will include sampling locations and their justification, targeted aquifers, analysis suites, periodicity of sampling and evolution of the monitoring network as mining progresses. The WMP will include a Stream Crossing Plan (including procedures to minimise sedimentation, erosion and deterioration of surface water quality (for downstream users) and ecological function of riparian habitats). As part of the WMP, CBG will install a tertiary treatment system at the Sangarédi sewage plant and will upgrade monitoring, analysis and management of discharges in both Sangarédi and Kamsar to meet IFC Guideline standards'*.

Detailed comments are made in separate 'mark-up' the plan, however some general comments and examples are made here that are applicable to the WMP and other plans.

The draft WMP reviewed prior to the site visit is 133 pages long and includes a lot of background information and a summary of impacts and mitigation measures [it is understood from EEM that much of this background information will be updated and moved to appendices in subsequent versions]. Chapter 9 (page 130) highlights priorities and implementation, however the text lacks specificity and includes reference to 'implementation of maintenance and mitigation measures in Section 8.1 and Table 8.1 (monitoring programme)'. In general, the plan lacks the level of specificity expected. For example, it refers to the 'Upgrade of the Sangarédi Waste Water Treatment Plant according to Section 5.1.1 and Baling (2016) report'. Ramboll has been aware of the need to upgrade the Sangarédi Water Treatment Plant (WTP) since its early involvement on the Project, however, despite recommendations made in 2016, CBG has not provided a timeframe or firm commitment to upgrade the WTP.

The IESC believes the WMP, and management plans in general, should include clearly defined actions necessary to meet objectives (such as meeting an effluent discharge standard) with responsible parties and timeframes. The actions can be prioritized, but require management signoff and by association, budgetary commitment. Since the site visit, Ramboll has been informed of CBG's intention to prepare detailed Action Plans in support of the management plans.

Ramboll supports the use of detailed Actions Plans, however these should be integrated/appended to the management plans. Of critical importance, the Action Plans should be agreed with CBG Senior management and be included in CBG's budgeting.

The IESC also draws attention the ESAP item that requires the WMP to include a Stream Crossing Plan. Such a plan as described in the ESAP item does not appear to be included in the WMP. The IESC has been informed that stream crossing criteria has been included in a Construction Management Plan. The adequacy of the stream crossing criteria provided in the Construction Management Plan needs to be assessed against the intent of the ESAP, and linkages between the two plans made clear. This should be an issue for further consideration by the IESC as part of its broader review of the WMP following finalisation of this report.

7.3 Oil spill

In December 2017, CBG experienced an oil spill. One of the objectives of the trip was to understand more about this incident including:

- The root cause;
- Adequacy of emergency response and clean up actions;
- Corrective actions to prevent a reoccurrence; and
- Monitoring.

7.3.1 Background

The incident happened on 13 December 2017 when an oil/water separator malfunctioned allowing an estimated 600 litres of oil to leave the site and enter the Rio Nuñez estuary via a tidal drainage channel/creek. A CBG memo dated 18th December 2017 confirmed the release had been stopped and a response and clean-up successfully conducted. Initial environmental monitoring completed by the CBG Biodiversity Team indicated no significant adverse impact to flora or fauna. According to CBG, it held a meeting with representatives of the local community and authorities of Kamsar to explain the situation and the remedial measures taken. Ramboll was informed that this consultation initiative was well received by the community and by the authorities.

The photo below (Figure 7) was taken by CBG at the time of the spill.

Figure 7: Oil in the drainage creek at the time of the incident (courtesy of CBG)



7.3.2 Cause of the spill

At the time of the incident large quantities of oil were being generated by the old power generating units in Kamsar. During normal operations this oil is routed to a relatively new (2 years old) oil/water separator located to the west of the site adjacent to the tank farm (Appendix 4, Photo 20). However, at the time of the incident, a waste oil storage tank associated with the new separator (Tank 4) was full to capacity and a decision was taken to route the oil to an old separator to the South of the site (Appendix 4, Photo 20). The old separator is manually operated, however it was not operational at the time of the incident allowing the oil and water mixture to leave the CBG site unchecked.

CBG was notified about the oil release by the neighbouring operator working upstream in the estuary.

7.3.3 Site Visit observations

The IESC was able to view the old oil/water separator and the drainage channel on foot and also the estuary by boat. In addition, the operational oil water separator was also visited.

Significant volumes of free floating oil were evident at the old separator. Although contained, effort is required to recover and dispose of this oil.

The drainage channel was inspected on foot and found to be free from with the exception of some oil staining on hard surfaces (Appendix 4, Photo 27).

The mangroves appeared to be free from oil with no obvious deterioration apparent to vegetation. The long-term impacts of the oil spill and other discharges are unknown.

Large quantities of oil contaminated material, including contaminated soil, were generated during the clean-up operation (Appendix 4, Photo 26). The material is being temporarily stored adjacent to the old separator and is earmarked for bioremediation once the Tora Bora waste facility is operational (see Section 7.4, Waste Management).

7.3.4 Corrective actions

Following the incident, CBG Management put in place a task force team to follow the daily situation at the tank farm and developed an action plan. Daily meetings were held by the task force team to monitor the situation and follow-up on implementation of the action plan. A number of key corrective actions have been put in place as follows:

- The oil originated from old power generating units at the CBG power station. The power units were essentially failing and Ramboll has been informed that these failing units have been decommissioned following the commissioning of 2 new power generating units;
- The old separator has been isolated to prevent rerouting on waste oil in the future; and
- A skimmer, designed to remove oil from an intermediary oil/water storage tank, which malfunctioned at the time of the incident is undergoing repair.

Other measures included within the action plan prepared by CBG since the incident are as follows:

- Frequent measurement of Tank 4 levels (to ensure there is spare capacity);
- Repair of tank level/overtopping alarms;
- Better definition of workers' responsibilities and formalization of procedures;
- Ensuring the separator is working in accordance with its design specification; and
- Monitoring of oil concentrations in before and after the separator.

The measures described above will greatly reduce the likelihood of a repeat incident. It is however strongly recommended that oil concentrations are closely monitored throughout the implementation of the action plan/repair works and results reported to the Policy Lenders.

Post monitoring visit note: In a memo sent on 17th March CBG informed the IESC, Policy lenders and the GFA that the malfunctioning in-tank skimmer was under repair.

The IESC was also informed that approximately 300 litres of chemical dispersant were used during the response (Appendix 4, Photos 24 and 25). It is the IESC's understanding that the use of chemical dispersant in shallow and relatively low-energy waters near to mangroves is not recommended. This inappropriate response strategy further emphasizes the need to finalise ERPs, including oil and chemical response plans with predefined response strategies for credible incidents (See also Section 7.3.5, Oil/water separator).

7.3.5 Oil/water separator

Ramboll visited the 2-year old operational oil/water separator located adjacent to the tank farm. The same separator had been visited on the two previous monitoring trips. On each occasion Ramboll noted large volumes of oil arriving at the separator with evidence of residual oil downstream of the separator, thus suggesting the volume of oil was exceeding the design capacity. During this February 2018 visit, it became apparent that the separator was not

working properly due to a faulty oil skimmer (first stage of the process intended to remove bulk oil) and that the volumes of oil arriving at the skimmer were exceptional because of the failing power generating units. With the decommissioning of the old power generating units and repair of the skimmer it is hoped that oil concentrations discharged to the estuary will fall to acceptable levels. This will need to be confirmed by monitoring.

It is also noted that the oil water separator receives effluents from elsewhere on the site, including the locomotives maintenance and fuelling areas - see Appendix 4, photo 17. During the inspection of the separator, the discharge was noted to have a rusty brown colour, evident both at the point of discharge (Appendix 4, photo 28) and the immediate receiving waters viewed from the estuary (Appendix 4, Photo 31). Ramboll was informed that the cause of the discolouration was the use of Finasol at the locomotive maintenance workshop.

Finasol is a emulsifiable degreaser also used as a marine dispersant. It is likely that the oil water separator is not designed to recover emulsified/chemically dispersed oil, and as such the use of Finasol may be impeding the separator and resulting in discharge of dispersed oil droplets. The IESC therefore recommends this issue is further investigated by the HSEC team. In particular, the chemical properties of the Finasol should be reviewed and use of/quantities of Finasol used clarified. Based on the findings of these initial investigations, procedures for degreasing in the workshop/disposal of degreasing effluent may need to be revised.

7.3.6 Oil spill response equipment

Ramboll inspected CBG oil spill response equipment. The inspection was undertaken as a follow up to a previous inspection.

The oil spill equipment is stored in a number of locked containers managed by the Fire Prevention Department (Appendix 4, Photos 23-23). On this occasion the Fire Prevention Department was able to find the keys and provide prompt access to the containers. The containers appear to be unlabelled (non-inventoried) and located randomly in the port storage area. Of note, vehicles were parked in front of one container preventing immediate access to the equipment (Appendix 4, Photos 21 and 22). It would better for the containers to be located together in a dedicated area where unhindered access to the containers can be assured.

Management of response equipment, including stockpile locations, inventories, storage and readiness for use should be included as part of an oil spill preparedness and response plan. Ramboll recognizes that management of the stockpile, and indeed emergency response more generally, is under the remit of the Prevention Department (*Direction de la Prevention*). Ramboll further understands that cooperation between the HSEC team and the Prevention Department is limited and therefore strongly recommends emergency response plans are developed and actioned in collaboration with the Prevention Department. Senior management support may be required to ensure a collaborative and integrated approach between all relevant CBG entities, including HSEC and the Prevention Department.

7.4 Waste management

In July 2017, Ramboll raised a number of issues relating to the management of hazardous wastes and the need to select a location for a hazardous waste facility as an increasing priority as CBG and construction contractors on the Expansion Project continue to segregate and stockpile hazardous wastes.

In the July 2017 monitoring report Ramboll reported on CBG's plans to upgrade and use the Bendougou landfill facility located approximately 12km from Kamsar City. However, during the February 2018 site visit Ramboll was informed that CBG's future waste strategy would no longer include use of the Bendougou landfill, but instead would rely on the development of the Tora

Bora waste facility. The change in approach has been prompted by recurring access issues invoked by community members residing along the Bendougou landfill access route. The development of the Tora Bora location in Kamsar City will significantly reduce waste transportation distances and eliminate access concerns. It also provides CBG with an opportunity to design the facility to its specific needs¹⁰ and manage waste in line with good practice.

Restricted access to Bendougou has been a concern for CBG since Ramboll's involvement in the Project. The threat of road blockages has led to uncertainty affecting CBG's waste strategy, which in turn has put the waste management plan on hold. The decision by CBG Senior Management in December 2017 to develop Tora Bora allows for the finalization of the Waste Management Plan. An engineering plan has been developed (though not seen by Ramboll) which includes provision for raised waste cells (due to high ground water levels), a platform for 2 incinerators and an area for bioremediation of contaminated soils. Ramboll also understands that a budget for the first phase of the development (incinerator slab and fencing) has already been approved.

The IESC revisited the Tora Bora area during the site visit and other temporary waste storage areas within CBG's Kamsar facilities. The following observations are made.

- Currently, the Tora Bora area has been selected as the location for a hazardous and non-hazardous waste facility. No engineering works had taken place at the time of the site visit;
- Some non-hazardous wastes are being placed at Tora Bora because Bendougou cannot be used. Basic management measures are in place, including spreading and covering of the waste (Appendix, Photo 10). The intention is to recover this waste and reposition in accordance with the Waste Management Plan following engineering works at Tora Bora;
- Monitoring wells destroyed during activities relating to the MUA Rail Project will need to be replaced at the boundary of the waste facility; and
- A pile of used tyres stockpiled at the Tora Bora site had been burned shortly before our visit. The overnight fire, started by individuals looking to recover metal, created a number of health and safety risks. The ability of third parties to enter a supposedly secure site poses serious questions over the security personnel on duty that night.

Hazardous Wastes

Elsewhere in Kamsar hazardous wastes are being temporarily stockpiled awaiting commissioning of the Tora Bora waste facility. A dedicated waste storage area, intended for all CBG hazardous wastes, has been created adjacent to the Crusher site. The site is fenced and has a security presence and includes a number of labelled containers for various hazardous waste types (Appendix 4, Photos 6 and 7). Two observations are made about this facility:

- Wastes are positioned at the front of the containers, making access to the rear of the containers difficult. Better positioning of wastes will improve safety (prevent the need to climb over wastes) and ensure the capacity is used effectively; and
- One of the containers is dedicated to storage of wastes solvents. The containers are sealed resulting in high vapour concentrations given the lack of ventilation and high temperatures.

In addition to the above storage area, large quantities of contaminated soils/other materials are being stored adjacent to the now isolated oil/water separator (Appendix 4, Photo 26). CBG informed Ramboll that the waste is largely oil contaminated soil that will be sent for bioremediation at Tora Bora once the new facility is commissioned. The suitability of the waste for bioremediation will have to be confirmed.

¹⁰ The Tora Bora facility will only take CBG Project and Kamsar City waste. Wastes from Kamsar village will be transported to Bendougou by other parties.

A third stockpile of hazardous wastes (oil in 200 litres drums) is located at the new oil water separator. Although located in a bunded area, a section of the bund wall appears to have been removed for access purposes (Appendix 4, photo 30).

7.5 Air quality

7.5.1 Air Quality Management Plan (AQMP)

Similar to the WMP, detailed comments will be provided in a marked-up version of the AQMP. However, as a general comment, the draft AQMP also lacks specificity and provides recommendations/uses terms such as where appropriate, thus reading like a document prepared by a consultant for CBG. The management plan, or the action plan therein, should read as a CBG document and contain precise actions with responsible parties and timeframes.

As an example, the AQMP refers to: use of low sulphur fuels where appropriate at the Kamsar processing facility; and the use of low sulphur diesel along the railway corridor, if available locally. Whereas the statements are appropriate for an ESIA Report, the management plan should be more definitive and commit to precise actions. Of note, Ramboll was informed that CBG is testing the use of low sulphur fuel (1% Sulphur content) and plans to increase its use. Such efforts will result in a significant improvement of the air quality and should be captured in the plan. Longer term actions to monitor and reduce emissions from the main stack should also be included, recognizing these may be part of a longer-term improvement programme.

The decommissioning of old power generating units is expected to significantly improve air quality in Kamsar. Photo 29 (Appendix 4) shows thick black smoke during the restart of an old power unit.

7.5.2 Air Quality Monitoring Programme

Ramboll visited a permanent air quality monitoring station and was shown CBG's environmental laboratory (Appendix 4, photos 12 and 13). The monitoring team has faced several challenges including equipment failures and open fires in proximity of monitoring equipment, but nevertheless, the procurement and installation of continuous/non-continuous monitoring equipment is a major positive. Results from the air quality monitoring can be used to refine the monitoring programme and inform/prioritise air quality management actions.

7.6 Environmental monitoring

An Environmental Monitoring Plan has been prepared in French and is currently undergoing translation. To date it has not been provided for review.

7.7 Greenhouse gas emissions

The IESC highlights that CBG has committed to annual reporting of GHG emissions during the operations phase and a number of energy efficiency measures to reduce GHG emissions. With the approaching completion of the construction phase CBG should be drafting a methodology for GHG emission calculations if such a methodology has not already been prepared.

7.8 Mine Reclamation and Conceptual Closure Plan (MRCCP)

The MRCCP has undergone an iterative review process prior to the monitoring visit. During the site visit Ramboll expressed concern that timeframes associated with the Action Plan presented within the MRCCP had been significantly extended without justification. More specifically, Ramboll was concerned that commencement of actions was being delayed without reason.

During the monitoring visit, Ramboll was provided a status update on many of the 'extended timeframe' actions in which it became apparent that good progress had been made on several of

these actions. On the basis of the evidence provided Ramboll is comfortable that the actions detailed in the MRCCP are being progressed.

7.9 Transport Safety Management Plan (TSMP)

Ramboll understands the TSMP has been drafted although has not been provided the opportunity to review this plan. It is understood final drafting of the Plan is imminent; comments on this plan will be provided separately to this report upon receipt of the Plan.

7.10 COBAD Road

7.10.1 IESC Sign-off of the COBAD Road ESIA (Report)

Ramboll is required to provide confirmation that the mitigation measures described in the COBAD Road ESIA are being implemented. In 2017 Ramboll was unable to sign off against this requirement because certain mitigation measures were not being implemented, typically because they were not in CBG's control. The mitigation measures in the ESIA were amended taking account of CBG's level of influence over COBAD, however, following this revision a small number of relatively insignificant mitigation measures were still unrealistic/not implemented in practice. For example, the commitment for CBG inspection of the COBAD Road on a weekly basis when in practice inspections occur on a bi-weekly basis. In this example, Ramboll accepts the bi-weekly inspection frequency and merely requested the ESIA is amended to reflect actual practice.

CBG agreed to further amend the COBAD Road ESIA in meetings held during the monitoring visit. Upon receipt of a revised ESIA Ramboll will revisit the ESIA with the intention of signing off the COBAD Road ESIA in accordance with the ESAP requirement.

Post visit note: In the period between the site monitoring visit and finalisation of this report, CBG has proposed a way forward for each of the residual issues discussed during the monitoring visit. CBG's proposal is currently under review; upon agreement the ESIA can be amended accordingly for IESC sign-off.

7.10.2 Field Observations

At the time of the visit there was no water abstraction from within the CBG concession with the previously-observed pumps having been removed. Water for dust suppression is being abstracted from a river in the COBAD concession where a new pump has been installed. The new pump reduces the risk of a diesel leak although it is not banded (Figure 8).

Figure 8: Water abstraction for the COBAD Road north of the CBG concession



Table 7-1: Summary of Findings (PS3)

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion)
Feb 2018 _008	Water Management Plan (WMP)	The current WMP has a number of shortcomings as described in the text above.	All / PS3	The WMP should be revised to include clearly defined actions necessary to meet objectives (such as meeting an effluent discharge standard) with responsible parties, timeframes specified. Comments made separately by Ramboll following review of the WMP should be fully addressed. The actions can be prioritized but require management sign-off and by association, budgetary commitment. This might be via a dedicated Water Management Action Plan.	Moderate	Open
Feb 2018 _009	Oil spill - incident	CBG experienced a release of oil in December 2017. The release was caused following the diversion of oily water from the main (new) oil water separator. The new (2 year old) oil water separator has been malfunctioning and is under repair at the time of writing this report.	Operations/ PS3	Confirmation is required that corrective actions are being implemented and that repair works to the skimmer are completed. CBG should confirm that post repair discharge of oil is compliant with IFC limits.	Moderate	Open (pending repair works and confirmation that IFC oil limits are met)
Feb 2018 _010	Oil spill – use of chemical of dispersant	Chemical dispersant was used during the response. It is the IESC's understanding that the use of chemical dispersant in shallow and relatively low energy waters near to mangroves is not recommended. This inappropriate response strategy further emphasizes	Operations and Construction /PS3	Emergency Response Plans, including oil and chemical response plans should be prepared as a priority. The plans should include predefined response strategies for credible incidents, including guidance and protocols for the use of chemical dispersants.	Moderate	Open

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion)
		the need to finalise emergency response plans, including oil and chemical response plans with predefined response strategies for credible incidents.				
Feb 2018 _011	Oil spill response – equipment stockpiles	<p>Containers used to house oil spill equipment appear to be unlabelled (non-inventoried) and located randomly in the port storage area. Vehicles were parked in front of one container preventing immediate access to the equipment.</p> <p>The Prevention Department is responsible for maintenance and employment of oil spill response equipment.</p>	Operations and Construction /PS3	<p>Containers to be located together in a dedicated area where unhindered access to the containers can be assured.</p> <p>Management of response equipment, including stockpile locations, inventories, storage and readiness for use should be included as part of an oil spill preparedness and response plan.</p> <p>Emergency Response Plans should be developed and actioned in collaboration with the Prevention Department. Senior management support may be required to ensure a collaborative and integrated approach between all relevant CBG entities, including HSEC and the Prevention Department.</p>	Moderate	Open
Feb 2018 _012	Use of degreaser	Finasol is a emulsifiable degreaser also used as a marine dispersant which is used as a degreaser during maintenance of locomotives. It is likely that the oil water separator is not	Operations/ PS3	The use and discharge of Finasol should be is further investigated by the HSEC team. In particular, the chemical properties of the Finasol should be reviewed and use of/quantities of	Moderate	Open

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion)
		designed to recover emulsified/chemically dispersed oil, and as such the use of Finasol may be impeding the separator and resulting in discharge of dispersed oil droplets.		Finasol used clarified. Based on the findings of these initial investigations, procedures for degreasing in the workshop/disposal of degreasing effluent may need to be revised.		
Feb 2018 _013	Waste management	<p>CBG will develop a dedicated waste reception facility at its Tora Bora. In the interim hazardous wastes are being temporarily stored. During the visit the IESC noted:</p> <ul style="list-style-type: none"> Evidence of tyre burning at Tora Bora Poor ventilation in a waste solvent container (a confined space) 	Construction and operations/ PS3	<p>Security at Tora Bora needs to be improved to prevent tyre burning in the future.</p> <p>Storage of waste solvent needs to be reviewed to ensure adequate ventilation and prevent to build up of solvent vapours.</p>	Minor	Open
Feb 2018 _014	COBAD Road	A small number of mitigation measures identified within the revised COBAD ESIA were not being fully implemented by CBG.	Construction and operations	The COBAD Road ESIA requires some further minor modifications to ensure mitigation measures and actual practices are aligned. Appropriate revisions were discussed during the monitoring visit and a way forward agreed.	Moderate	Open (remains an open issue until agreed measures transposed into the ESIA)

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

A draft (RevA) Community Health and Safety Management Plan (CHSMP) has been prepared and was issued to Lenders/IESC for review on 31 May 2017.

A revised Security Management Plan (SMP) has been prepared and is awaiting internal approval. This version of the SMP was shown to the IESC, but it was not provided for IESC review for reasons of confidentiality.

In the July 2017 IESC monitoring report, some observations/comments were provided on the social unrest that occurred, prior to the monitoring site visit, in the Kamsar, Boké and Sangarédi areas. Following its visit to Sangarédi during the February 2018 monitoring visit, the IESC can add to its observations with respect to Sangarédi.

8.1 Community Health and Safety Management Plan

Lender/IESC comments on the CHSMP (RevA) have been submitted to CBG. No date has been set for submission of the revised CHSMP.

8.2 Security Management Plan

Since September 2017, there has been an Asset Protection Advisor in place. He is responsible to the Director of the '*Direction de la Prevention*' (who is the Security Manager) and can advise and recommend, but he does not have managerial authority.

The Advisor has updated and revised the SMP taking into account comments made previously, on the draft Plan issued in March 2017, by the IESC. At present, the Plan is in the CBG 'approval' process. It has been disseminated to key CBG personnel with the aim of receiving views on whether '*it can work*'. Once approved it is intended that the Plan is updated every 6 months. Discussion with the Asset Protection Advisor indicated that the drafting of the updated and revised SMP had been done '*in isolation*' with limited inputs from colleagues in other departments.

The revised SMP was shown to the IESC, but the IESC was not provided with a copy to take away and was not able to review it for confidentiality reasons. The Asset Protection Advisor described its structure and contents. It consists of the Plan plus 2 annexes (collectively referred to as the SMP). The SMP contains material on key issues such as, but not limited to:

- Roles and responsibilities;
- Application of the Voluntary Principles on Security and Human Rights;
- Use of 'private sector' security providers and State forces (*forces de l'ordre*) consisting of the police, gendarmerie and military;
- Due diligence in selection of private security companies;
- Training of security guards; and
- Exercises and drills.

It is acknowledged, by the Advisor, that CBG can control/manage private security providers, but that its ability to manage State forces is limited. There is currently an agreement (*Protocole*) that CBG can 'Request Assistance', from the State *forces de l'ordre*, which was signed and approved by the previous Director General in 2015. It is understood by the IESC that this 'Protocole' does not explicitly refer to international good practice and rules of engagement.

The 2 annexes consist of a Crisis Management Plan and an Evacuation Plan respectively. The former is based on a Risk Assessment focusing, primarily, on Sangarédi and Kamsar, with

accompanying mitigation and risk reduction measures. The latter annex only focuses on expatriates, not Guinean nationals.

Without having reviewed the revised SMP, the IESC is not able to comment upon its content and likely effectiveness. From its discussion with the Advisor, the IESC considers that the revised SMP is likely to be aligned with CBG's needs, key PS 4 provisions, and to be an effective instrument for managing security risks. However, the revised SMP can only achieve its expected outcomes if there is sufficient high-level 'buy-in' to the Plan and effective ownership by senior management going forward. The institutional process under which the current version of the SMP was prepared, and is being finalized for approval, gives the IESC cause for concern that its potential effectiveness may not be realized due to the lack (as understood by the IESC) of cross-departmental collaboration (for example, between HSEC and the *Direction de la Prevention*) in its preparation.

It is planned that a hard copy (only) of the 'approved' SMP will be provided for review by the IESC during the subsequent IESC monitoring visit in Q3. 2018.

During discussion of evacuation procedures, it became apparent that predefined muster points exist in case of the need for an evacuation. The Advisor was surprised that the IESC had not been informed of the muster points during a security induction following arrival on site. The IESC recommends emergency evacuation muster points are included in the HSEC induction.

8.3 Railway safety

The Railway Department has undertaken/will undertake several initiatives regarding rail safety:

- Programme to upgrade railway crossing barriers (over 4 years, 5 crossings will be upgraded);
- Seeking advice, initially from a Canadian consultant and more recently from IFC Advisory Services on mechanisms to improve railway safety; and
- Planning an awareness campaign in communities (in conjunction, as necessary, with the roads department) backed up by other communication means such as Radio CBG.

As recorded in the July 2017 IESC monitoring report, there has been co-ordination with the CR team regarding a rail safety awareness campaign. As a component of implementing the Stakeholder Engagement Plan, the CR Department has prepared an Action Plan for Community Consultations and Sensitization for the period 2017-2018 (see Section 5.6). This Action Plan is based around key topics which will be the focus of specific consultation/sensitization activities in selected communities. One of these topics is road and railway safety. As of February 2018, 101 villages had been identified near both the railway and the port and 43 had been visited by CR team members for sensitization/consultations, mostly in the Kamsar and Kolaboui areas. Due to the number of villages involved in this (and other) campaigns, under the Action Plan, the date for completion of the work is 31 December 2018.

In Q3 and Q4 of 2017 and continuing into 2018, the CR team has been working with the CFB, with respect to MUA Rail Project implementation, covering sensitization and mobilization of communities regarding land take and involuntary resettlement. This activity has provided an additional forum for rail safety issues to be emphasized as/when appropriate.

In Kamsar, CBG started to erect a 9-km fence on both sides of the railway to deter people from crossing the railway. At the same time CBG has erected several pedestrian bridges (overpasses) at regular intervals, particularly near busy market areas, located on the main road into Kamsar from Boké, to encourage people to cross the railway at these points (Appendix 4, photo 24). Work to erect the fences has stopped as some community members want improved water and electricity supplies as a *quid pro quo* for 'agreeing' to the fencing. At the time of the July 2017 monitoring visit, the IESC understood that CBG was prepared to assist with water supply and

believed that the community would relent and allow the fencing. However, during the period prior to the recent local government elections and the period of political uncertainty following the decision of the Opposition to contest the election results, no action has been taken to resolve the 'stand-off' between certain sections of the Kamsar community and CBG regarding the future of the fencing.

8.4 Social unrest

Although this issue was not a major topic for the monitoring visit, the IESC observed some of the results of the social unrest in Sangarédi. The July 2017 IESC monitoring report contains the following comments on the social unrest,

"Some villagers prevented CBG staff from establishing monitoring locations near their villages and from undertaking monitoring work. The main reason appeared to be a perception that CBG was not employing enough local people. At the time of the site visit there were no difficulties with local villagers. It is not clear whether the unrest/disturbances elsewhere acted as a catalyst for the 'Sangarédi' actions. Even if this were to be the case then it still indicates a degree of local concern about the issue of local employment opportunities with CBG".

During the February 2018 IESC monitoring visit, the IESC observed that the headquarters of the Gendarmerie in Sangarédi had been destroyed. However, work was seen to be underway to reconstruct the building and the IESC was informed that the Sangarédi 'community' had agreed to pay for the restoration work. Also, the IESC was informed by CBG personnel that minor damage had occurred to certain CBG properties. Thus, the unrest in Sangarédi was more serious than originally reported by the IESC. This finding gives added impetus to the suggestion, made in the July 2017 IESC monitoring report, that work to revise the SMP takes account of the recent social unrest in terms of the updating the risk assessment process and considers carefully the provisions of the Voluntary Principles on Security and Human Rights, particularly with respect to the rules of engagement (especially the use of force) should CBG find it necessary to call upon the support of the '*forces d'ordre*' in the future.

Table 8-1: Summary of Findings, PS4

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/ Closed (IESC Opinion)
Feb 2018 _015	Security Management Plan	Internal approval and subsequent dissemination and implementation of the Security Management Plan.	Construction and Operation PS4	Internal approval of the revised and final Security Management Plan to be granted as soon as possible. Dissemination and implementation of the Security Management Plan as soon as it is approved internally.	Moderate	Open

9. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

9.1 Introduction

Seven topics are presented below:

- COBAD Road: Land Acquisition and Involuntary Resettlement;
- Past Compensation Measures and Grievances Close-out;
- Hamdallaye and Fassaly Foutabhé RAP: Outstanding Non-Budgeted Actions;
- RAP Implementation: Institutional Capacity;
- Hamdallaye and Fassaly Foutabhé: Recent/Current Situation;
- Mine Plan Changes: Land Acquisition and Involuntary Resettlement Implications in 2018; and
- Land Acquisition and Compensation Payment for Land.

9.2 COBAD Road: Land Acquisition and Involuntary Resettlement

As stated in the July 2017 IESC Monitoring Report, a widow and her dependents were to be relocated soon because their homestead was situated in very close proximity to the COBAD Road. In Q3 2017, the widow and her dependents relocated to Sangarédi. CBG was involved, jointly, with COBAD in the planning for their relocation, to be implemented in accordance with PS 5, and several meetings occurred with Minutes taken. Eventually, the widow made a demand for compensation only, to enable her to build a house in Sangarédi (this occurred after damage occurred to a house that was being built for her and an offer by COBAD to build her a replacement house in its concession). She refused to move to the COBAD concession. COBAD then decided to pay the requested compensation against the advice of CBG. At that point CBG's involvement ceased. At the suggestion of the IESC, a short report is being prepared by CBG in the form of a 'Note to File' to confirm the end of its involvement and the reasons behind this decision.

Following the conclusion reached in the ESIA Report for the CBG Expansion Project – Addendum for the COBAD Road (September 2017) that the herding settlement of Hairé Hounsiré Woyoh had been 'abandoned', CBG considers that this settlement is no longer a potential candidate for relocation. Given the dynamic interactions between herders, grazing areas and settlements, in both time and space, it is possible that the previous residents may return if/when grazing and other conditions support such a decision. It is recommended that CBG should periodically check, at least monthly, for a period of 12 months from end April 2018, to determine whether the 'abandonment' may be reasonably considered to be permanent. Should the settlement be reactivated then options to manage the issue of noise and dust levels and threats to community health and safety and to livestock may need to be considered. These options might include assisting the community to select a nearby site before considerable time and effort is expended by the herders to reactivate the settlement, or it may require relocation if the settlement is inhabited and fully functioning.

9.3 Past-Compensation Measures and Grievances Close-Out

The ESAP contains the following requirement, *"Undertake review and assessment of past compensation and resettlement for the period January 2010 to January 2015. Ensure past compensation payments are not associated with a reduction in livelihood status for the recipients and any necessary mitigation measures are in accordance with PS5. Compliance is defined as a confirmation of no negative change in livelihood status for previous recipients of compensation payments."*

Since the end of 2015, CBG has submitted two reports to Lenders. Both have been subject to Lender/IESC comments and neither has been accepted as providing, "... a confirmation of no negative change in livelihood status for previous recipients of compensation payments." CBG expressed its concern at this situation and a clear desire to comply with the ESAP requirement; however, they were unsure how best to provide data that would enable a confirmation to be accepted by IESC/Lenders. During the IESC monitoring visit in July 2017, a meeting occurred involving the IESC's social specialist (following a pre-meeting discussion between the IESC's social specialist and IFC's social specialist) and CBG (supported by an EEM specialist). An approach to obtain the data to enable CBG to provide the necessary confirmation was agreed.

During the IESC monitoring visit of February 2018, a follow-up meeting was held involving the same IESC and CBG/EEM personnel. At this meeting, CBG/EEM explained that the attempt to apply the agreed approach was not successful in enabling the required data to be obtained. Having reached this conclusion, CBG/EEM then devised and implemented an alternative approach. The results, from application of this revised approach, will be presented in a report that will be available, by the end of March 2018, for IESC/Lender review.

9.4 Hamdallaye and Fassaly Foutabhé RAP: Outstanding Non-Budgeted Actions

The RAP (2015) for the displacement affecting the villages of Hamdallaye and Fassaly Foutabhé has been updated. Section 13.1 of the RAP contained 10 actions that required to be implemented by CBG, but which were not included in the RAP budget. On 30 April 2017, CGB issued a Memo entitled '*Hamdallaye and Fassaly Foutabhé RAP Supplementary Information*' which provided an account of actions taken by CBG, to date, to complete the required actions. The IESC and Lenders provided comments on this document and, subsequently, on 25 January 2018, CBG issued a document entitled '*Hamdallaye & Fassaly Foutabhe Resettlement Action Plan Supplementary Information Report*' which responded to IESC/Lender comments and effectively 'closed out' several outstanding actions and indicated significant progress toward 'closing' the other actions contained in the RAP. One action (Action 10: *Collaborate with other mining companies in the area, farmers and local authorities under the auspices of the Ministry of Livestock & Animal Industry to study the cumulative effects of transhumance restrictions on livestock by mining activities and develop a mitigation programs*) is considered, by CGB, to be no longer relevant. The remaining actions have now been integrated into the RAP implementation process.

Key actions 'closed out' are:

- **Making a decision on the whether the bowal area between the villages of Hamdallaye and Fassaly Foutabeh (but in the territory of Hamdallaye) should be included in the RAP (inventoried) or if measures to open up the area for mining should be implemented.** This area of land was assessed, partially, during the 2015 RAP surveys. In July 2017, at the start of the RAP post-survey implementation phase and prior to land clearing of the Hamdallaye ore storage/loading facility which is in this area, a full crop inventory (seasonal and perennial crops) was conducted and compensation paid to all identified Project-Affected Persons (PAPs);
- **Provision of 'new' access road for Boulléré to the Route Nationale and a 'new' access road for Fassaly Foutabhé to the Route Nationale either directly or via the 'new' access road for Boulléré.** The selection of the new 'Boulléré' route considered not only the views and concerns of village representatives and regional authorities, but also potential impacts on nearby communities. All affected land users (farmers) raised no objection to the proposed road alignment and accepted compensation payments. The 'new' access road for Fassaly Foutabhé will enable access to the Route Nationale via the 'new' access road for Boulléré. Finally, a small bridge will be provided, over the stream that runs

through the village, making it easier for pedestrians, cyclists and motorcyclists to access the new Boulléré road;

- **The date for the cessation of mining at the new Hamdallaye village site** is confirmed as being May 2016;
- **Providing credible justification regarding the almost zero/nil probability that mining activities in the future would result in future relocation of Hamdallaye.** Nearby reserves were either mined in 2017 or removed from the bauxite reserves (see Figure 9);
- **Confirmation that, if there are other land areas to be acquired not listed in the RAP, an inventory of these areas will be carried out and compensation made according to the rates established in the RAP.** Should such areas be required, then the land disturbance permit (*permis de perturbation*) process is triggered. This process involves consideration of land take, identification of the affected individuals/households/communities and payment of compensation amounts for crops and structures as per the Resettlement Policy Framework (RPF) (see discussion of payment for land in section 9.8);
- **Confirmation that an area for a new cemetery in the new village of Hamdallaye has been designated.** The existing cemetery in the current Hamdallaye village location will be protected and a suitable area for a new cemetery has been identified by the community and accepted by CBG; and
- **Confirmation that CBG has developed a continuous monitoring programme for surface water quality for the duration of mining in the RAP areas.** This monitoring programme includes monthly monitoring of surface and ground waters at specific locations in CBG operational areas such as boreholes and wells supplying drinking water to communities including both Fassaly Foutabhé and Hamdallaye.

Key actions showing noteworthy progress toward 'closing out' are:

- **Provision of a safe access route (crossing a mine road and a railway line) from the new Hamadallaye site to the agricultural areas of the Démourou valley.** Provision of safe access (guarded crossing 24/7) has been, *"...confirmed by CBG management and financed by Sangarédi on-going operation"*. This safe route and the crossing arrangements will be presented to the villages for 'validation' at least three months prior to relocation (see Figure 10). During the IESC monitoring visit of February 2018, it was confirmed that this presentation would be made to the Advisory Committee (see Section 9.5 below) and was expected to occur in the 'coming weeks'; and
- **Confirmation that current evidence supports the view that there is sufficient ground water supply to satisfy village needs.** Two boreholes, drilled at the end of the wet season on 2017, provided data leading to an initial confirmation that the average yield of water, that fell within World Health Organization standards for potable water, provided sufficient supply for a population three times the size of the current Hamdallaye village. Four more boreholes will be drilled in April 2018, at the end of the dry season, to provide final confirmation that there is a sustainable average yield to secure potable water supply for the new Hamdallaye site now and in the future (considering the expected increase in population).

Figure 9: Status of bauxite reserves on the boundaries of the new Hamdallaye site

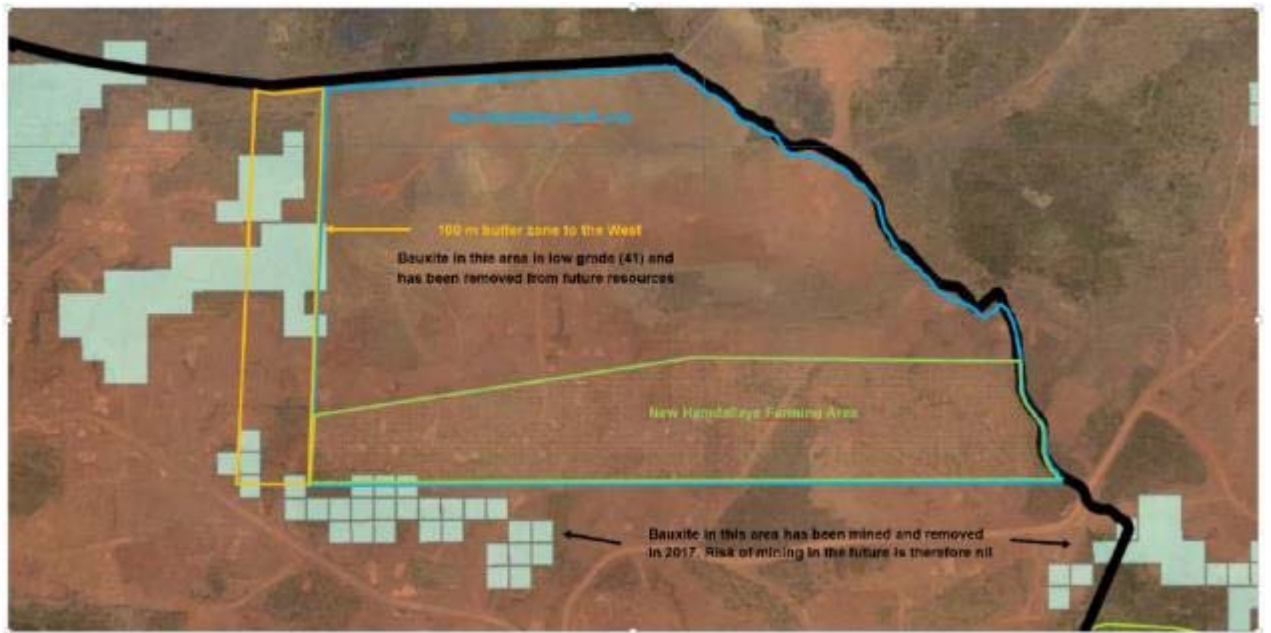
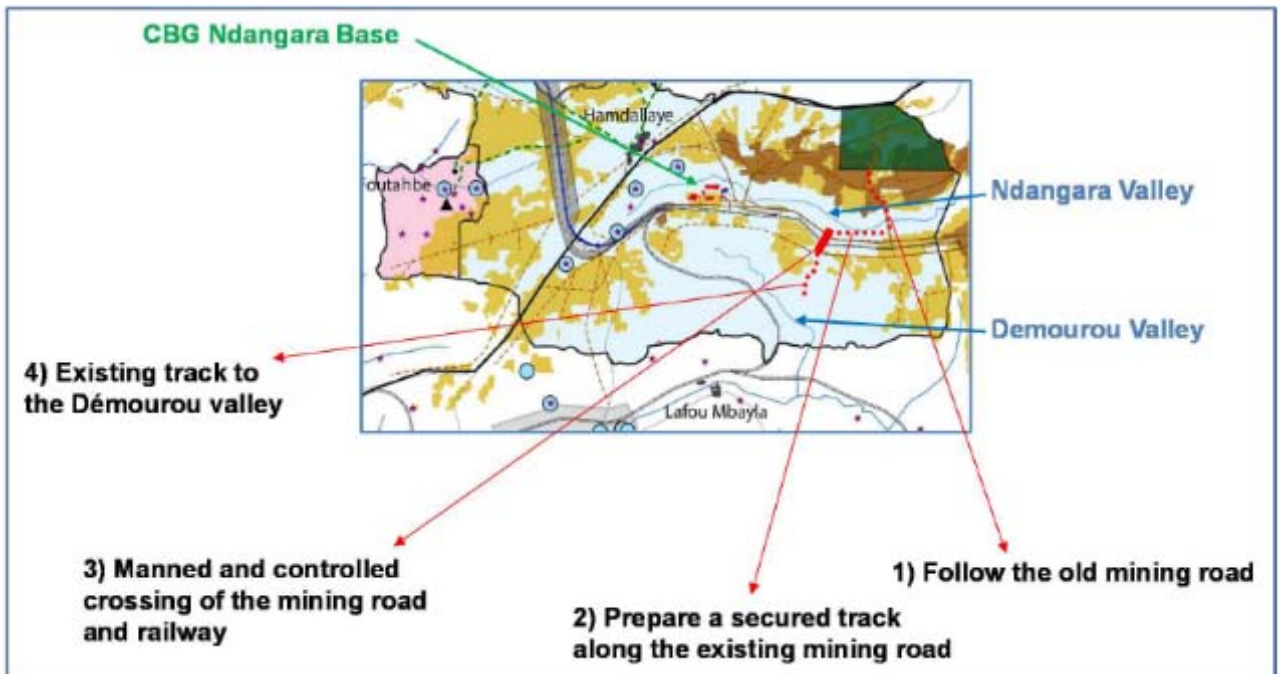


Figure 10: Map showing access from new Hamdallaye location to Démourou valley



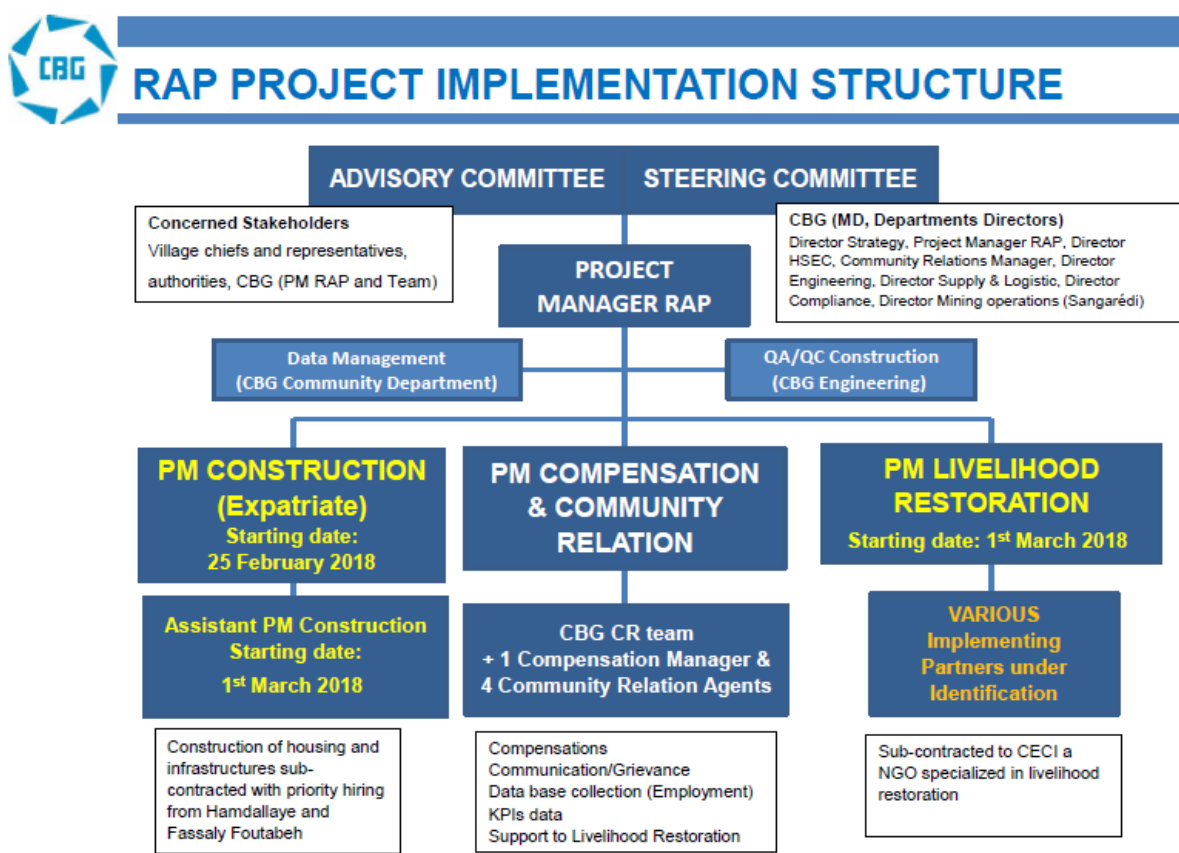
9.5 RAP Implementation: Institutional Capacity

The Resettlement Manager (also known as the RAP Manager) remains responsible for all land acquisition and involuntary resettlement issues (as defined in PS 5). At present, implementing the RAP (Hamdallaye relocation and Fassaly Foutabhé economic displacement) is the focus of the Manager’s attention. In practice, other CBG activities that are undertaken in line with RPF

requirements, are implemented by the CR team; however; it has the active involvement and support of the Resettlement Manager in this work.

The current version of the organogramme for the RAP Implementation ‘team’¹¹ is shown in Figure 11. It is similar to the organogramme presented in the IESC’s report on the July 2017 monitoring visit , but with a few notable changes are: addition of an Advisory Committee of 9 individuals (includes local community ‘representatives’ such as the chief, women, youths and the head teacher) to complement the Steering Committee (CBG personnel only), the addition of an Assistant Project Manager for ‘Construction’, plus expected start dates for key ‘Construction’ personnel, and for commencement of certain actions such as implementation of livelihood restoration measures.

Figure 11: Current RAP implementation management structure



During the February 2018 IESC monitoring visit, it was confirmed that the Canadian NGO ‘CECI’ (which has a country office based in Conakry and is already working on a wider ‘concession-level’ livelihood uplift programme for CBG) is the implementing partner for managing the livelihood restoration component of RAP implementation. As indicated in the organogramme, specialist sub-contractors to support CECI will be needed and tendering is underway. Finally, two companies have been contracted to construct the physical infrastructure and housing.

¹¹ As the relocation of Hamdallaye is the key current RAP activity, the organogramme is structured to reflect the management structure for the Hamdallaye relocation. As there is no relocation foreseen for Fassaly Foutabhé, the ‘construction’ element is not applicable to Fassaly Foutabhé. Any works needed to restore community assets (including access road/s) will be implemented by CBG’s engineering function.

9.6 Hamdallaye and Fassaly Foutabhé: recent/current situation

In December 2017, the Hamdallaye asset inventory was completed. This work has enabled a more accurate account of the village population to be made. Currently there are considered to be 107 households, with a total of 576 inhabitants, living in the village. Almost 50% of the population is aged 12 years or younger.

Implementation of the RAP is continuing with an updated schedule (see Figure 12). The updated schedule shows that although 'infrastructure' construction works and construction of housing for Hamdallaye are foreseen as beginning in February 2018, the physical relocation of Hamdallaye village is now expected to occur over the period 01 March to 15 May 2019. At the time of the previous IESC visit (July 2017) the expected date for relocation was November 2018 and at the time of the first IESC monitoring visit (November 2016) relocation was expected to occur in the first half of 2018. Cumulatively, therefore, over the period between the IESC's first and third monitoring visits, the relocation of the villagers has been delayed by approximately 1 year.

The current revised RAP Implementation Schedule sets out a range of actions all leading up to the planned March-May 2019 relocation. There are three key actions; first the preparation of the Action Plan for Livelihood Restoration (to be initiated on 15 January 2018) and secondly, the construction of physical infrastructure and the housing that is planned to be started by 8 February 2018. At the time of the IESC monitoring visit (19-26 February 2018) none of these actions had started, indeed, it was indicated by the RAP Manager, that the housing construction may not begin until April. The construction of housing may be considered to be on the 'critical' path, as it is not planned to be completed until the end of the third week of April 2019 and the relocation is planned to be completed by the middle of May 2019. Any delay in starting construction may not be easily recoverable during the construction phase resulting in some households potentially not being relocated until after mid-May 2019. The short delay in initiating the Action Plan for Livelihood Restoration is unlikely to affect the date for relocation.

The Action Plan for Livelihood Restoration will take almost 7 months to prepare and will include various kinds of training to help prepare villagers for implementation of the livelihood restoration measures. The RAP Manager indicated that CBG is planning to implement some 'quick impact' activities during the Action Plan preparation period. This is a prudent decision given the strong concern among the villagers about delays and lack of action by CBG.

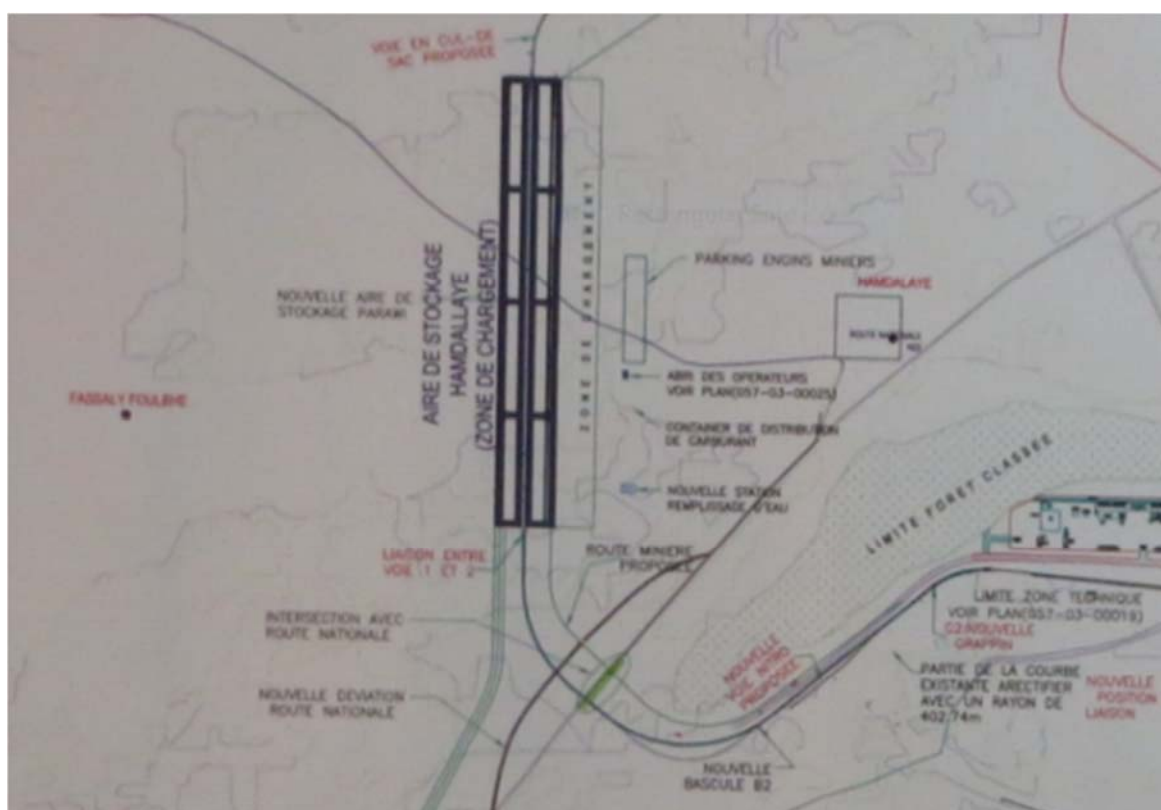
As presented in the report of the July 2017 IESC monitoring visit, the IESC social specialist met with Hamdallaye villagers (meeting held 'in the open') and concern was expressed about the adverse implications that the relocation delay was having on local economic activities. At the meeting concerns were expressed, by a range of villagers, that indicated that the trust (*confiance*) between them and CBG was being placed under strain, but was not yet seriously threatened. During the February 2018 IESC monitoring visit, the IESC social specialist met with Hamdallaye villagers, again in an open-air forum. At this meeting, it became clear that the trust was now seriously threatened. Critical and strongly formulated verbal statements were made about the delay and, toward the end of the meeting and, indeed, after the formal end of the meeting, heated exchanges continued between certain villagers (mostly involving those that had been vocal during the meeting) and, also, between villagers and CBG personnel on a one-to-one basis (these were less heated than the intra-villager exchanges). Despite the increase in concerns and criticisms about the delay, there was no overt indication that relations between CBG personnel (all from the CR team apart from the RAP Manager) and villagers had deteriorated to the extent that effective consultations could not occur in the future.

Figure 12: Updated RAP Implementation Schedule

	START	END	Jan. 18	Feb. 18	Mar. 18	Apr. 18	May 18	June 18	July 18	Aug. 18	Sep. 18	Oct. 18	Nov. 18	Dec. 18	Jan. 19	Feb. 19	Mar. 19	Apr. 19	May 19	2021	
MAIN IMPLEMENTATION CONTRACTS AND RESOURCES																					
Implementation Project Manager Hamdallaye & Fassaly Foutabeh RAP	1 June 2017	30 May 2019	[Red bar]																		
Englobe Contract & Resources (5 for Community Issues and 2 for Construction)	1 December 2017	28 February 2019	[Red bar]																		
Borehole drilling and construction	1 October 2017	30 April 2018	[Red bar]																		
Housing and Infrastructures Construction	30 January 2018	30 April 2019	[Red bar]																		
Livelihood Restoration (Project awarded to CEO for implementation in March 2018)	30 January 2018	15 April 2021	[Red bar]																		
SUB-PROJECT - COMPENSATIONS																					
Crops inventories of critical areas - (Required for Parawi Construction Project)	10 July 2017	12 December 2017	[Red bar]																		
Crops inventories of Future Mining Areas - (2020-2035)	1 April 2018	30 November 2018	[Red bar]																		
Update of Hamdallaye housing Inventories	10 July 2017	12 December 2017	[Red bar]																		
Preparation of final housing compensation choices and validation by families	7 January 2018	28 February 2018	[Red bar]																		
Plots measurements at Hamdallaye and Plot distribution/allocation at New Hamdallaye	20 August 2017	15 April 2018	[Red bar]																		
Tree inventories at Hamdallaye	1 April 2018	30 June 2018	[Red bar]																		
Create data base of Hamdallaye & Fassaly Foutabeh employment pool	3 January 2018	31 January 2018	[Red bar]																		
SUB-PROJECT LIVELIHOOD RESTORATION																					
Contractor selection (including potential local NGOs for implementation)	17 July 2017	9 January 2018	[Red bar]																		
Planning and Action Plan (including Key management training) for livelihood restoration	15 January 2018	31 August 2018	[Red bar]																		
LR Project implementation (project training, financing, Coop,...)	1 September 2018	30 April 2019	[Red bar]																		
Follow-up and continuous support	1 May 2019	31 March 2021	[Red bar]																		
SUB-PROJECT - CONSTRUCTION																					
Bouliéré Road (Construction by Parawi Project), Fassaly Foutabeh, Démourou	1 September 2017	30 September 2018	[Red bar]																		
Fassaly Foutabeh Road (Tolls, Contracts, Construction by sub-contractor)	1 December 2017	31 August 2018	[Red bar]																		
Démourou access from New Hamdallaye (Plan defined, route 85% existing, Execution by Mine)	1 July 2017	31 March 2019	[Red bar]																		
Resettlement site layout & preparation	1 April 2017	9 February 2018	[Red bar]																		
Borehole drilling and construction (2 out of 6 completed)	7 October 2017	30 April 2018	[Red bar]																		
Public building construction (Mobilisation, construction)	8 February 2018	30 September 2018	[Red bar]																		
Housing construction (Mobilisation, construction)	8 February 2018	3 April 2019	[Red bar]																		
Final preparation of site roads	1 July 2018	31 January 2019	[Red bar]																		
Site tree planting (Phases 2 and 3)	1 April 2018	30 April 2019	[Red bar]																		
MOVE TO NEW SITE																					
Preparation and execution	1 March 2019	15 May 2019	[Red bar]																		

At the meeting, the key concerns, apart from the delay, related to water provision at the existing village, shade and access to agricultural lands (both at the new village site). In addition, concerns were raised about the impacts arising from current nearby CBG activities, particularly blasting and dust generation. Since the previous IESC monitoring visit in July 2017, CBG has made considerable progress in improving transport infrastructure (in particular, a road/rail crossing with a temporary 'deviation' of the RN 3 is in place) and creating the new stockpile area (*aire de stockage*) between Hamdallaye and Fassaly Foutabhe (see Figure 13). CBG does alert villagers to the timing of blasting, but the adequacy of these alerts is perhaps in doubt, based on the comments made in the meeting. Complaints were also made about CBG's hiring of villagers; villagers stated that they have educated youths, but they are "never employed by CBG". Comments were made that those that have been employed do not receive training to improve their skills. Unfavourable comparisons were made with GAC's performance.

Figure 13: Plan showing the Aire de Stockage and the road/rail crossing immediately to the south



The scale of these transport infrastructure works, and the speed of implementation provide a possible context for villages increasing discontent about the continuing delays in the relocation of Hamdallaye (see Figures 14 and 15). The villagers can see that CBG can act quickly and effectively in pursuit of the goals of the Expansion Project and they can contrast this level of effort/commitment with the relocation process. At the meeting, this comparison was not made; it is solely an observation of the IESC social specialist.

Figure 14: Section of road/rail crossing works near Hamdallaye (close-up)



Figure 15: Road/rail crossing works near Hamdallaye (panoramic view)



During the meeting, the IESC social specialist observed that the 'structure' of the meeting, in the sense of the composition of the participants and how they were arranged, had changed from the

two previous meetings. As previously, participants were sitting together in blocks, such as *chef du village* and elders, youth and women. However, the arrangement of the blocks had altered. There were many more men and women of all ages, but predominately, the young and middle-aged, attending compared with the earlier meetings. Also, the *chef du village*, accompanied by some elders, was not sitting opposite the CBG/Lender/IESC group. During the meeting there were many more interventions from villagers, in proportion to those from the *chef du village* and elders, compared to the previous two meetings. A post-meeting discussion between the IESC social specialist and key CBG personnel confirmed that there had been recent changes in the political dynamics in the village.

With reference to shade and water supply at the new Hamdallaye site, the first attempt to plant acacias trees to provide shade has only achieved approximately 50% first year survival. The exact reason/s for the failure of the remaining 50% to grow is/are not clear. During a visit to the site, the IESC noted that the site is mostly grassland with a few acacia saplings (see Figures 16 and 17). With respect to water supply; two test boreholes were installed during the wet season (they are currently sealed) which demonstrate that there is a sufficient and sustainable supply of potable water for the relocated village. However, four more boreholes will be dug at the end of the dry season to verify this provisional result (see Section 9.4 above).

Figure 16: Surviving acacia tree: new Hamdallaye village site



Figure 17: View of section of the new Hamdallaye village site (showing relative extent of grass and tree cover)



The IESC social specialist also attended a meeting in Fassaly Foutabhé (unlike the previous two visits/meetings this was a meeting in the centre of the village attended by a range of villagers, including women; previous meetings were more restricted - involving an elder and, at most, one or two male villagers). Land acquisition and direct economic displacement is not yet affecting the villagers. The villagers stated that they do not know yet which specific areas will be affected by land take or when¹²; however, they do know the 'general' areas to be affected: an area of cultivated land and an area that is, currently, fallow land. One villager stated that, following the 2015 asset inventory '*no papers were given to the beneficiaries*'. This inventory is now out of date and validation is planned by CBG in the future nearer to the time when compensation will be paid. Finally, one comment was made that the villagers want to see concrete and immediate action in terms of improved or restored access (footpaths and an upgraded access track with bridge over the stream – capable of being used by bicyclists and motorcyclists as well as pedestrians - to join the new road from Boulléré to the RN 3) and a replacement school (current access to Hamdallaye school will cease when Hamdallaye relocation occurs). CBG is committed to meeting these access requirements and provision of a new school and sites have been selected. It is also providing a 'prayer building' as access to the Hamdallaye mosque will be more difficult after Hamdallaye relocation. CBG is consulting the villagers on all these elements of community infrastructure, for example a meeting was held on 08 February 2018 to discuss the new access track to the 'Boulléré' road (also attended by some villagers from Hamdallaye¹³).

¹² CBG stated to the IESC social specialist that land may not be 'acquired' for another 5 or 6 years.

¹³ Fassaly Foutabhé is a 'daughter' village of Hamdallaye and residents use Hamdallaye's community infrastructure. The Hamdallaye *Chef du Village* is not the *Chef du Village* of Fassaly Foutabhé; however, he plays a key role in validating all important community decisions.

Most of the discussion in Fassaly Foutabhé centred on wider issues in relation to the village and CBG's activities. Villagers stated that current CBG operations (see Figure 13 above, Fassaly Foutabhé is located near to the Aire de Stockage) are affecting access by preventing use of certain paths and both adults, and children on their way to school, must make detours. Concern was expressed regarding dust generation, with dust stated as reaching the village, and the potential for increased sediment loads, in the wet season, in the stream that runs through the village. This stream is a very important resource for villagers including provision of potable water in the wet season.

9.7 Mine Plan Changes: Land Acquisition and Involuntary Resettlement Implications in 2018

In the July 2017 IESC Monitoring Report, it is stated that the relocation of the hamlets known collectively as Kankalaré would be required in 2018. The land is required for a new mining road, linked to the development of the 'Parawi' plateau component of the Expansion Project. Kankalaré is not a typical village in its structure and layout. It has developed from recently created individual dwellings (over the past 8 years), some of which are in small clusters (classified by CBG as 'hameaux') located linearly, over a distance of about 3 km, and near each other, along the RN 3, to the south-west of the village of Hamdallaye. Most are located on the north side of the RN 3, although there is some occupation on the south side of the road (Figure 18).

Figure 18: Structures in an 'Hameau' on north side of RN 3 near Hamdallaye.



CBG considers that the occupation of these areas is illegal and confirmed to the IESC that those who have created the dwellings/structures and 'hameaux' are residents of nearby Parawi and other settlements and that many of them retain their main dwellings in their natal villages. CBG has informed those occupying the structures that their occupancy of the land is illegal (end 2015 and in the first semester 2016) and that they are expected to move before mining begins in this area.

In the July 2017 IESC Monitoring Report, it is stated that CBG decided to abide by PS 5 and prepare a RAP to manage the relocation/compensation of those who have established agricultural plots and housing along the RN 3. During the February 2018 IESC monitoring visit, an update on the status of the Kankalaré relocation was obtained.

However, a RAP has not been prepared. Instead, CBG has prepared a Report entitled '*Rapport de Synthèse: Relocation des Hameaux de Kankalaré – Route Minière Parawi-Koobi*' (February 2018). In this report it is stated that the inventory of assets and provision of compensation will be conform to Guinean law, PS 5 and CBG's existing procedures for land take and resettlement issues. The relocation work is managed by CBG's CR team.

Key features of the relocation process are:

- Consultations began in 2015 and have continued since that period;
- Asset inventory occurred in April/May 2016 followed by disclosure to Kankalaré residents of the 'cut-off' date. A second inventory was completed in October/November 2017 as the Kankalaré residents wanted the shortest possible time between the inventory and the actual relocation;
- Asset valuation occurred following the completion of the second inventory in 2017;
- 88 individuals (from a population of 515) compensated for 164 structures and 84 areas of cultivation;
- Compensation calculated at replacement cost;
- Cash compensation only: for structures, crops plus amounts for transitional support (for periods between vacating Kankalaré and taking occupancy of a house in a host community¹⁴) and transport to support the costs of moving;
- No compensation for land;
- No livelihood restoration measures;
- Provision of four boreholes to improve water supply in the 4 host villages likely to receive the most displaced households;
- Residents informed that once all compensations payments had been received they had 7 days within which to complete their move from Kankalaré; and
- Compensation payments made in presence of a *Huissier de Justice*¹⁵.

The *Rapport de Synthèse: Relocation des Hameaux de Kankalaré – Route Minière Parawi-Koobi* provides an account of certain key activities undertaken. Also, it provides accounts of the 2016 asset inventory and of the valuation of the assets in 2017. Finally, it presents a series of Minutes of Meetings with the results of consultations with Kankalaré residents. However, this Report is not a RAP as it either omits a number of key RAP elements or provides insufficient information, for example:

- No comprehensive assessment of livelihood impacts;
- No consistent focus on vulnerable people (they are mentioned once early in the report, but not referred to again);
- No census results (the asset inventory does provide some limited socio-economic data);
- No entitlements matrix: there is instead an explanation of the compensation principles and how compensation amounts were calculated;

¹⁴ Expected in most cases it to be the same as the natal villages.

¹⁵ May be translated into English as 'bailiff'. Although their respective roles are similar there are some differences. A bailiff and a *Huissier de Justice* both implement court decisions, but a *Huissier de Justice* also can be a 'witness' to the signing of important documents – as in the case here - of compensation payments.

- No budget provided; however, the total cost of all compensation amounts plus payment to local government officials involved in the land acquisition and compensation process is provided;
- No description of institutional responsibilities;
- No summary account of all the consultations which occurred; however, Minutes of Meetings are provided; and
- Very limited account/commitment to the type of monitoring and evaluation that will occur.

CBG's working objective was to have Kankalaré 'clear' of people by mid-March 2018. At the time of the February 2018 IESC monitoring visit, all compensation payments had been made, in the presence of the *Huissier de Justice*. However, some residents were still residing in the hamlets and had requested more time (up to 6 months) within which to move. CBG stated that it might consider allowing 1 or 2 weeks more, on a case-by-case basis; however, if some residents still remained, then the *Huissier de Justice* would be brought back to ensure a rapid voluntary relocation. Subsequent to the IESC site visit, CBG has confirmed to the IESC that all inhabitants of these hamlets have left peacefully and there was no need to rely on a judicially-sanctioned process of forced eviction.

In the IESC July 2017 monitoring visit report, an issue is raised regarding access of Kankalaré and Telli Bofi children to the school in the new location of Hamdallaye village as the new school is further away from these settlements than the current Hamdallaye school which they attend. This issue was not discussed during the February 2018 IESC monitoring visit, but subsequent to the IESC's site visit, CBG has informed the IESC that the Hamdallaye School Director has confirmed that pupils from Kankalaré are attending school in Horé Lafou (3 classes), Parawol and Parawi. The issue of Telli Bofi children will be addressed in the forthcoming monitoring site visit planned for Q3 2018.

9.8 Land Acquisition and Compensation Payment for Land

During the site visit, the IESC was informed that CBG has never directly compensated land users and occupiers for land on the basis that all land belongs to the state. Thus, no land user or occupier has a recognizable legal right of 'ownership' of the land used/occupied unless in possession of a land title issued by the appropriate level of government (that is, the state). The IESC was also informed during the site visit, that to begin to directly compensate for land would, in CBG's view, create an unhelpful precedent. Instead, CBG considers 'enhanced' livelihood restoration activities (incorporating a 'notional' amount, estimated as being the compensation cost of the land, into the overall budget for livelihood restoration) as a 'replacement' for not paying, directly, for acquired land.

CBG's 2016 RPF (prepared on behalf of CBG by external consultants) considers the requirements of the Guinean Land Tenure Code (1992) and finds that there is no explicit reference to traditional land tenure systems and that the State is the only legitimate land authority. The RPF also presents the results of a gap analysis between Guinean law (essentially, but not only, based on the provisions of the Land Tenure Code) and PS 5, which contrary to the view expressed by CBG during the site visit, interprets Guinean law as treating individuals and groups with customary land-tenure as titled landowners (reference is made to Article 39 of the Land Tenure Code). Following this interpretation, the RPF contains an 'Entitlements Matrix for Land' which clearly provides for two types of land compensation for eligible households (and other entities): 'in kind' compensation; that is, land-for-land and, also, financial compensation for land.

Although the RPF has not been disclosed publicly, it is the CBG approved document that governs all land acquisition and involuntary resettlement actions taken by CBG, and provides the basis for the RAP for Hamdallaye and Fassaly Foutahbé, that has been publicly disclosed inclusive of a

similar entitlements matrix which references to monetary compensation for land. This is the only 'resettlement-related' plan that CBG has prepared to date. Currently, CBG practice with respect to the Hamdallaye and Fassaly Foutahbé RAP is not fully aligned with its RPF commitments, because monetary compensation has not been made. Action is needed to ensure that land acquisition (and compensation) activities are aligned *de jure* and *de facto* in the future.

Post visit note: Following the IESC's monitoring site visit, a discussion occurred in mid-April, between Lenders and CBG on the land compensation issue and CBG informed the Lenders that it has changed its policy regarding compensation for land. It now intends to offer land-for-land (expected to be reclaimed mine land) when available which, in principle, is aligned to PS5, but only on the basis that the land is 'equivalent' to the land lost in terms of productive potential and access. When this option is not possible, then an appropriate form of financial compensation, compliant with PS 5, will be provided. This change needs to be disclosed publicly, with a presentation of the new policy, by CBG.

Table 9-1: Summary of Compliance Findings, PS5

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/ Closed (IESC Opinion)
Feb 2018 _016	(Potential) Relocation of Hairé Hounsiré Woyoh	The herder settlement of Hairé Hounsiré Woyoh is considered to be 'abandoned'. There is a possibility that the herders may return as the current period of herd movement, within the regular herding 'cycle', may not yet be completed	Construction and Operations/ PS5	CBG to check, at least monthly, for a period of 12 months from end April 2018, to determine whether the 'abandonment' of Hairé Hounsiré Woyoh may be reasonably considered to be permanent.	Moderate	Open
Feb 2018 _017	Relocation of Hamdallaye Village	There has been a further delay to the date for relocation of Hamdallaye village (from November 2018 to a time period in Q1/Q2 of 2019).	Construction / PS5	Ensure the mobilization of CBG's delivery partner/s to enable infrastructure/housing construction and the implementation of the Livelihood Restoration Programme Action Plan for Livelihood Restoration to begin as soon as possible. Implementation of 'Quick Impact Projects' during Action Plan preparation	High	Open
Feb 2018 _018	Access to agricultural land for new Hamdallaye site	Safe access to agricultural lands – in particular, the Démourou valley– is required for Hamdallaye villagers.	Construction	Consult with Hamdallaye Advisory Committee and residents about the intended safe access route and ensure that agreement is reached and recorded (in the form of a meeting Minute (<i>Procès Verbal</i>)). Senior management to confirm, that the current option for provision of access has been approved, as quickly as possible and that finance and personnel resources are available to	Moderate	Open

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/ Closed (IESC Opinion)
				provide the manpower to manage the road/rail crossing effectively.		
019	Provision of shade for new Hamdallaye village site	Following the failure of the campaign to plant acacia spp in 2107, there is a need to ensure that shade planting occurs	Construction	Ensure shade planting is begun as quickly as possible, after careful examination of the species to be used and the timing, techniques and post-planting management needed to ensure the maximum survivable rate.	Moderate	Open
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>)).	Moderate	Open
021	Community asset replacement for Fassaly Foutabhé villagers	New school needs to be approved by Government and requires pupils from Mbouroré to make it viable.	Construction	Maintain and strengthen efforts to ensure school is viable and then proceed to construction of the school.	Moderate	Open
022	Change in mine plan	Land take for mine operations in near future requires relocation of Kankalaré hamlets in 2018 and thus swift action is needed to prepare the Resettlement Action Plan.	Construction/ PS5 and ESAP	Prepare RAP in near future Update Resettlement Policy Framework in near future.	High (increased to High because relocation is scheduled for April 2018 and there is not a compliant RAP is in place)	Open
023	Land acquisition	The RPF states that cash compensation will be provided for land acquired by CBG. Although	Construction and Operation/PS5	CBG to clarify its legal obligations under national law (essentially, the 1992 Land Tenure Code) and	High (Reducing to Moderate/	Open

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/ Closed (IESC Opinion)
		<p>the RPF has not been disclosed by CBG, a RAP including a similar statement on monetary compensation for land has been disclosed.</p> <p>CBG has not directly compensated for loss of land and there is a contradiction between stated CBG 'policy' commitments and actual practice during the resettlement of Hamdallaye. This has the potential to result in financial (CBG) and reputational (CBG and Lenders) risks.</p> <p>Post visit note: <i>CBG intends to offer land-for-land (expected to be reclaimed mine land) in line with PS5 where possible. When this option is not possible, then an appropriate form of financial compensation, compliant with PS 5, will be provided.</i></p>		<p>its loan agreements, and review its current practice regarding compensation for land take.</p> <p>Based on the outcome of this review take immediate action to align its stated and disclosed 'policy' commitments with its actual practice.</p> <p>Should this alignment of 'policy' and practice require amending the RPF, then the amended policy must be publicly disclosed (possibly via an update of the RAP Memo).</p> <p>Should this alignment result in a change of practice then compensation for all land acquired, since the approval of the RPF, must be implemented, retrospectively, in a manner that meets national and PS 5 requirements.</p> <p>See post meeting note in Section 9.8</p>	<p>Low following implementation of the new policy and adjacent recommendations</p>	

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

10.1 Introduction

As per a requirement in the ESAP, CBG has developed a Biodiversity Management System (BMS) that is designed to achieve net gains of Critical Habitat as per PS6. Mitigation measures and a schedule for their implementation were identified in the BMS version 1, dated 29th February 2016. The main aim of the site visit in relation to biodiversity was to ascertain the extent of progress in the implementation of BMS mitigation compared to previous IESC site visits in July 2017 and November 2016.

According to CBG's BMS action tracking tool, of the 216 BMS actions (habitats, species and general): 16 have yet to commence, 9 are late, 152 are in progress and 37 have been implemented at the time of the February 2018 site visit. This compares to the following recorded in July 2017: 88 not started, 48 late, 63 in progress and 14 completed. Much of the improvement relates to the initiation of the 2-year set-up phase of the forest management programme and monitoring programmes for chimpanzees, reptile and amphibians (see Section 10.3).

The ESAP also contains items relating to the off-site biodiversity offset for chimpanzees. The offsite offset was not a focus of the site visit and is not commented on in this site visit report.

10.2 Resources

10.2.1 Biodiversity Manager

The ESAP includes the requirement for CBG to employ a dedicated full-time Biodiversity Manager to manage the biodiversity risks associated with CBG's operations. During the first year in-post, the Biodiversity Manager was largely diverted away from implementation of the BMS to complete non-biodiversity related tasks such as the Waste Management Plan. Concerns were raised about this situation by both the Policy Lenders and the IESC. Within the July 2017 Site Visit Report, Ramboll recommended that the Biodiversity Manager's time should be refocussed back to implementing the BMS and developing the biodiversity team's capabilities a matter of urgency. It also recommended that the Biodiversity Manager should be enabled to spend more time at Sangarédi, with a focus on transferring knowledge and capability from the Expansion Project to CBG Operations. During discussions with the Biodiversity Manager prior to the February 2018 site visit, he stated that these recommendations were implemented by CBG and it is clear that this has contributed to a significant improvement in the implementation of the BMS since July 2017.

It is understood that the Biodiversity Manager is approaching the end of his existing 2-year employment contract. The July 2017 site visit report recommended that CBG needed to start planning a transition process as a matter of priority to ensure that there is a suitable hand-over period. Senior management of CBG were not present during the site visit and therefore it was not possible for Ramboll to ascertain what progress has been made on this recommendation.

10.2.2 Biodiversity Team

CBG has built a team of four biodiversity technicians, two based in Kamsar and two in Sangarédi, in addition to four environmental technicians. As previously noted in the July 2017 site visit report, the team is relatively inexperienced, although it has continued to show significant development since the November 2016 IESC monitoring site visit. During the February 2018 site visit, Ramboll was impressed with the dedication of each of the individuals, as well as the overall team spirit that was

displayed. The team at Sangarédi has been provided with a well-equipped new office within the N'Dangara facility (Figure 19). It is apparent that the biodiversity team has benefitted from improved levels of training from the Biodiversity Manager since July 2017. However, training and capacity building should remain a high priority for CBG and requires commitment in terms of management support and budget to enable for it to continue. The Biodiversity Manager has developed a training plan for the team that includes the following:

- Characterization of ecosystems and habitats;
- Characterization of landscapes and vegetation;
- Good approaches for biodiversity management in mining industries;
- Environmental Management; and
- Training in written and spoken English

It is understood that the Biodiversity Manager has also proposed that the training and experience levels of the Biodiversity Team could be enhanced through exposure to best practice by visiting Rio Tinto and Ambatovy (PS 6 based) biodiversity program in Madagascar. The IESC concurs with the potential capacity-building benefits that this visit would bring.

It appears that previously reported resource constraints including vehicle availability and lack of field equipment has been largely resolved. However, there remains an issue of lack of access to heavy plant equipment, to complete restoration tasks, which restricted the restoration of the old alignment of the COBAD Road. According to the CBG 2017 annual biodiversity report, an area of seven hectares remain to be restored. Large earth moving machinery are dedicated to mining operations and not available to the HSEC team. Therefore, it is not clear how the remaining seven hectares will be restored. The access to heavy machinery may be possibly facilitated if the HSEC team are integrated into the operational business so that they are not viewed as a separate entity.

The biodiversity team is currently situated within the Expansion Project HSEC team. The July 2017 site visit report recommended that to effect significant changes to the environmental management of the mine, the Expansion Project capabilities and knowledge need to be transferred to the mine operations. This is consistent with the ESAP requirement to implement a ESMP that covers both Expansion and Operations. This is likely to require organisational restructuring such that the Biodiversity Team are transferred to the operation of CBG and provided an operational budget.



Figure 19: CBG Biodiversity Office at N'Dangara Facility, Sangaredi

10.3 Biodiversity Monitoring Studies and On-Site Offset

10.3.1 Chimpanzee and Herpetology Monitoring and Forest Management Programme

The BMS includes the requirement to complete additional studies on chimpanzees to determine more accurately population size and habitat, as well as long-term monitoring of critical habitat features (including amphibians and reptiles). These studies are also required to better assess potential impacts to the Boulléré Key Biodiversity Area (KBA), as well as inform the development of the on-site offset. At the time of the July 2017 site visit, CBG was still in the process of tendering both the chimpanzee study and a 2-year project to develop a community-based forest landscape management structure. Ramboll recommended that these contracts should start before the end of July 2017. It appears that the contracts with Sylvatrop Consulting ('Sylvatrop') were not finalised until early 2018, meaning that surveys during the wet season in 2017 were missed. However, by the time of the February 2018 site visit, Sylvatrop had made a rapid start to fieldwork and had completed a 10-day ornithological survey. Sylvatrop had also initiated the chimpanzee survey, completing an initial mission between 6th-13th February that included meeting with communities, the setting-up of transect surveys, installation of 40 camera traps, identification of nests, and collection of faecal samples. Sylvatrop are scheduled to complete a total of 6 survey missions for chimpanzees between the start of February and 24th April 2018.

The herpetology monitoring programme is due to start in March 2018 (a reconnaissance visit was made in January 2018). This programme includes survey visits in April/May (dry season) and July/August (wet season). The programme also includes for training of the CBG Biodiversity Team in monitoring techniques and snake handling, as well as awareness raising in local communities and stakeholder engagement.

The implementation of the forest management programme is envisaged to deliver the on-site offset for chimpanzees, as well as numerous other BMS actions, including protection of the Boulléré KBA, provide a net gain in other critical habitat features associated with watercourse and gallery forest, as well as community involvement in management of potential impacts such as hunting and fuelwood use. As such, it is a pivotal programme to meet the requirements of IFC PS6. However, the first 2-year phase that has been contracted to date is purely an inception stage to develop the main long-term programme. It is understood that at the current time, the long-term programme has not been budgeted for by CBG. If it is to be included in the 5-year 2019-2024 budget that is due to be set in September 2018, it is essential that CBG obtain interim findings from Sylvatrop and allocate sufficient resources.

10.3.2 Participative monitoring programme

CBG has developed a participative monitoring programme for flora and vegetation. This has identified ten 'para-botanists' from surrounded communities that will be trained by Missouri Botanical Garden (MBG) for long-term participative monitoring of permanent vegetation plots. This programme was the first started in November 2017. Unfortunately, because of social unrest, they were demobilized before the training could start. However, the programme was due to start shortly after the IESC site visit in February 2018 [the latest update from CBG is that it has started in mid-April 2018].

10.3.3 Fish

As discussed in the July 2017 site visit report, the objectives and approach to the long-term monitoring of fish has been the subject of discussion between CBG, Ramboll and the Lender group. Options discussed include the potential for using physical parameters to monitor habitat quality, as well as the potential use of environmental DNA. During the July 2017 site visit, CBG and Ramboll discussed briefly the possibility of using gallery forest as habitat proxy for fish. CBG are now proposing that this is the approach that will be taken. Ramboll recommends that this issue is discussed further with the Policy Lenders to agree a final approach.

10.3.4 Marine mammals

CBG has developed a scope of works for a marine monitoring programme, including hump-backed dolphin, manatees and turtles. It also includes a wider programme of survey of mangroves and to investigate cumulative impacts from other operators. It is understood that the management and monitoring of the Rio Nunez has been included on the agenda for the Biodiversity and Ecosystem forum (see section 10.8.2) meeting due to take place between CBG, GAC, SMB, and COBAD on the 22 May 2018.

10.4 Creation of plateau-by-plateau management units

The BMS prescribes the creation of plateau-by-plateau management tool ensuring early planning and monitoring and including input from the environment, social and engineering sides. This was agreed a priority action in the December 2016 Paris workshop. It is understood that procurement issues reported in the July 2017 site visit report have been resolved and CBG now has GIS software in place and progress has been made on the creation of the plateau-by-plateau management tool¹⁶. This has included the building of the underlying GIS database that include constraints such as critical habitat, headwater springs and villages. It is understood that a constraints mapping protocol has also been developed that sets out specific buffer zones for each constraint, but this has yet to be fully

¹⁶ EEM start working on a SOP plateau-by-plateau analysis to include management of mining activities taking environmental and social concerns into consideration. The IESC has been informed that work on the SOP will start in May 2018.

incorporated into the plateau-by-plateau management tool. The protocol prescribes a 100 metre buffer for all critical habitat and 200 metres for headwater springs. However, the assumption that 200 metres is sufficient to protect the hydrology of headwater spring has not been demonstrated by the Water Management Plan currently under development; the draft Water Management Plan states: *Six months before mining any new area greater than 2 ha, the new area needs to be surveyed for head-water springs. When they are located, add a no-go zone buffer, and communicate to CBG mining department.* The IESC assumes the 200m buffer is a default figure which will be adjusted on a case-by-case basis.

At the current time, the landscape planning of mine restoration has yet to be developed. The planning of which vegetation types are to be restored is essential to balance the needs of local communities and for the restoration of natural (and critical habitats). This also has not been incorporated into the latest 5-year rehabilitation plan (see next Section). The Biodiversity Team has procured a Trimble Yuma GPS device that allows accurate geolocation in the field, as well as in-field access to the plateau-by-plateau management tool. This will be an invaluable tool for the Biodiversity Team as it monitors and liaises with CBG operations to ensure that constraints are identified, and buffer zones respected.

10.5 Restoration Plan

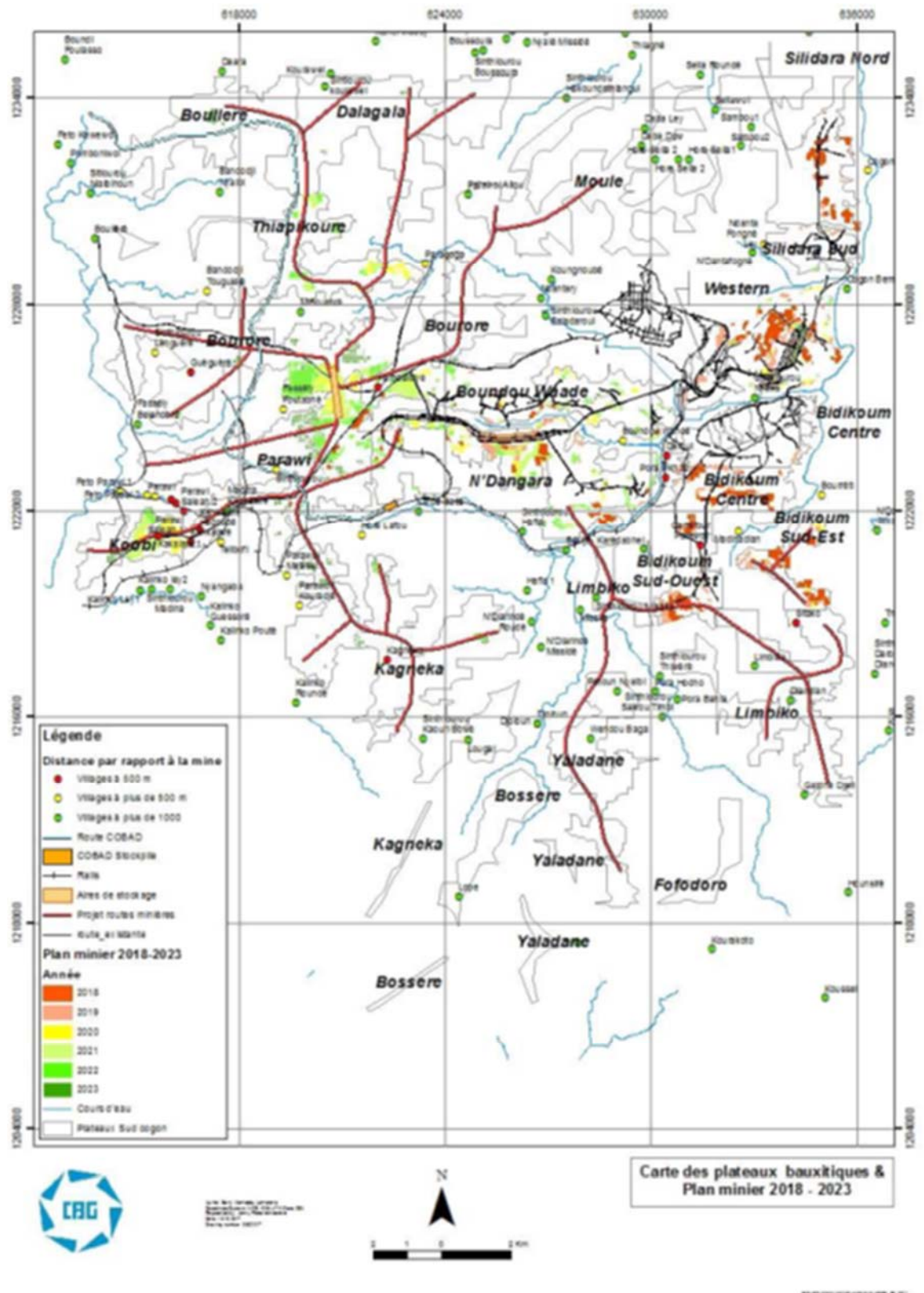
CBG has developed a 5-years strategic mine rehabilitation plan for the period 2018-2013 (actually a six-year period) that covers the 1490 hectares that are designated for mining (Figure 20). This equates to an average of approximately 250 hectares per annum. The plan sets out the methodologies to be employed to reprofile the exploited areas, re-spreading of topsoil and restoration of vegetation. The restoration includes for the following options:

- Cashew “*Anacardium*” plantation
- Plantation of non-native *Acacia* (*Acacia mangium* and *Acacia auriculiformis*) that are fast growing and popular with local communities for fuelwood due to its high calorific value.
- Ecological restoration, either through active planting, or through passive natural regeneration from the soil seed bank.
- Planting of non-native Vetiver grass in areas of high risk of soil erosion.

The level of detail in the planting specification is reasonable, although it does not specify planting densities for native species for the active ecological restoration. However, the main gap in the plan is the specification of which vegetation restoration technique will be completed at each specific location. The plan also does not set out the decision-making process required to define the most appropriate technique. As noted in this report already, this detail has yet to be incorporated into the plateau-by-plateau management tool (or the six-quarterly integrated mining plan) and is essential to ensure that the needs of local communities and for the restoration of natural (and critical habitats) are balanced.

According to the 2017 annual biodiversity report, a total 125 Ha of mine site rehabilitation has been achieved by the CBG mining operation in 2017. Only 7 hectares of this area received ecological restoration, with 118 hectares of *Anacardium occidentale* plantations. Of the 125 ha, 24 hectares received topsoil spreading.

Figure 20: Mine Plan (2018-2023).



10.5.1 Community Nursery

CBG has supported the establishment of a community enterprise to grow native plants for CBG’s ecological restoration of mined areas. CBG has committed to purchase 100,000 plants from the new

community nursery during the first year. After this, it is envisaged that the nursery will also supply other mining operations in the region. Ramboll recognises the high value of the proposed approach, for improving the restoration of mined areas, supporting local livelihood and promoting good practice to other operators. However, it is not clear to Ramboll if the longer-term viability of the enterprise is dependent on supplying CBG, or is secure beyond year one. It is also not clear what area of land will be ecologically restored each year going forward and whether the projected output of the enterprise will be sufficient to meet CBG's requirements.

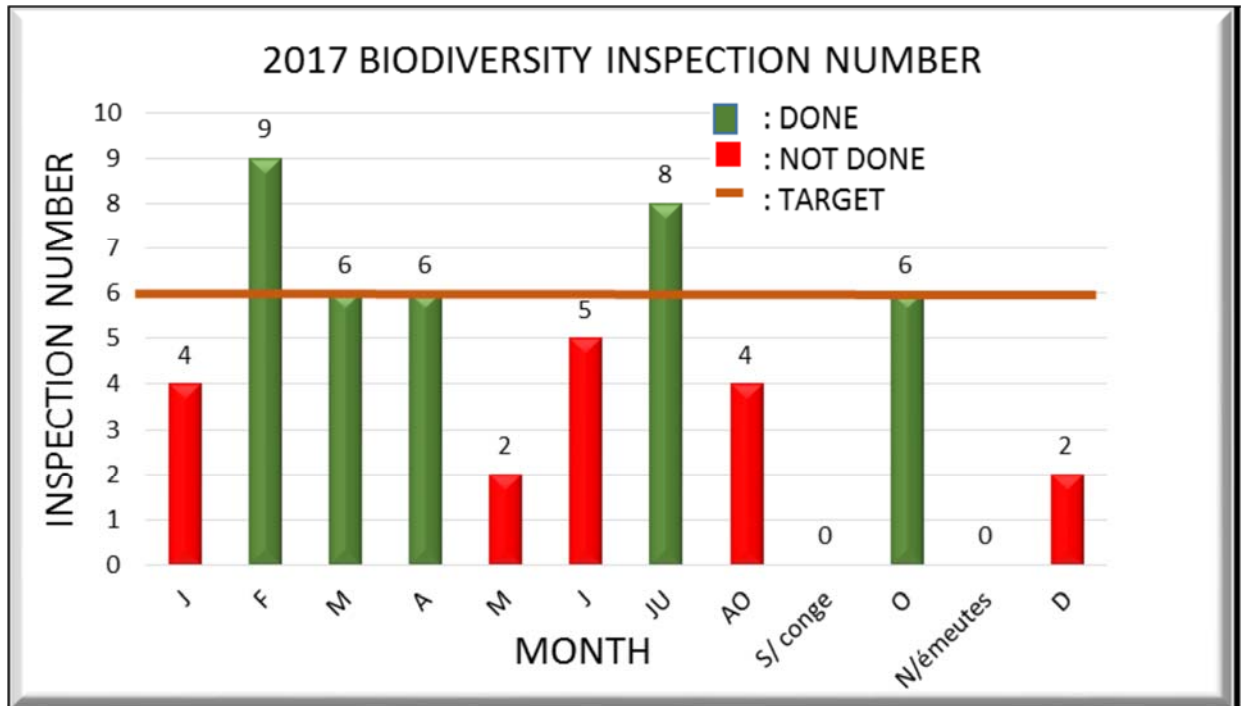
Figure 21: Community Nursery



10.6 Routine environmental inspections

A HSEC inspection team has been created, which was particularly active in monitoring the construction activities of the COBAD road. Since COBAD construction has ceased, this team has refocussed to monitoring CBG operations. CBG has developed a proforma for use by the team during inspections. This currently includes a small number of elements relating to biodiversity and in the July 2017 site visit report, Ramboll recommended that this could be further developed to contribute to the implementation of BMS actions, which has yet to be enacted (see Section 10.6 of the July 2017 site visit Report). CBG's biodiversity team has set itself target of completing six biodiversity inspections per month. Progress towards meeting this target is ongoing despite the recent disruptions from local community unrest.

Figure 22: 2017 Biodiversity Inspections per Month (source: 2017 Biodiversity Annual Report).



An example of the positive outcomes of the biodiversity inspections were shown to Ramboll during the February 2018 site visit. CBG have commissioned a contractor to construct a new road to Boulléré, to replace an existing road that is being removed as part of the Parawi project development. This new road crosses a river in one location. During the inspection of these works, it was identified that plant crossing the watercourse were causing unacceptable levels of sediment and cut trees had been left in the river bed. Rectifying actions were identified and communicated to the contractor to implement without delay. The same inspection identified that the contractor was leaving excavated banks with steep slopes that would be prone to erosion. The contractor was informed to ameliorate the slopes to facilitate installation of erosion control measures. See also Section 7.2 relating to the development of a Stream Crossing Plan as part of the broader Water Management Plan.

10.7 Land Disturbance Permits

According to the CBG 2017 annual biodiversity report, a total of 22 Land Disturbance Permits (LDP) had been issued to manage vegetation clearing, topsoil stripping and erosion control. It is understood that the LDP process now covers all CBG operations, not just the Expansion Project. A recent example of a LDP was provided to Ramboll prior to the site visit (Route Minière Thiapikhouré, dated 15/12/2017) and it appears comprehensively completed including a brief pre-clearance botanical survey and site-specific mitigation measures. It does not appear that a stream crossing plan has been produced for this new road.

During the February 2018 site visit, one location in Kamsar subject to a LDP was visited where a subsequent monitoring visit identified that the contractor had extended construction works beyond the agreed works boundary identified within the LDP. As a result, CBG has instructed the contractor to implement restoration of the disturbed areas. Whilst additional fine tuning of the process and proforma would likely be beneficial (see July 2017 site visit report), this example demonstrates that it is already delivering mitigation on the ground.

10.8 Ecosystem services and stakeholder engagement

The July 2017 site visit report noted that CBG's engagement with local communities by the biodiversity team was being completed on an ad-hoc basis. The IESC recommended that the CBG biodiversity team develops an engagement strategy that identifies the objectives, identifies the target audiences and methodologies to be employed. It is understood that engagement with communities will be a central focus of the development of the forest conservation programme, which is a logical approach and should capture many of the issues relating to ecosystem services such as hunting and fuelwood. However, the main programme is not due to start for 2-years and there are some aspects that will likely require additional focus of CBG's Biodiversity and Communities Teams in the short term. In particular, the issue of human wildlife conflict was once again identified during Ramboll's site visit and has possibly worsened since July 2017. During a visit to Kagnaka village, the local communities expressed concern over the conflict with chimpanzees over access to the spring that is the sole source of water for the village. On this occasion, it was noted that unless a resolution is found, the village may take action through hunting the Chimpanzees. Although CBG are not due to exploit the nearby bauxite plateaus until after 2023, due to the existing high level of human-wildlife conflict, immediate action may be required to find a solution. Finding a solution to this issue could be taken into account as part of the on-site offset. Furthermore, there may be a relatively simple solution as there is an existing well close to the village that apparently has had the pump stolen. The human wildlife conflict may be significantly eased through the replacement of the pump by CBG.

10.8.1 Biodiversity and Ecosystem Services Working Group

The BMS prescribes that CBG establishes a Biodiversity and Ecosystem Services Working Group involving stakeholders and external partners as a forum for communication and discussion. During February 2018, CBG and GAC organised the first Biodiversity and Ecosystem round table between GAC, CBG, SMB, COBAD, non-government organisations (NGOs) and biodiversity experts. During the first meeting, the creation of a Biodiversity and Ecosystem forum was agreed. The next meeting is scheduled for the 22nd May 2018 to coincide with the International Day for Biological Diversity 2018. The agenda for the meeting will include:

- Rio Nunez estuary integrated management
- Forest landscape integrated management
- Rehabilitation and restoration: technical exchanges
- Using the same languages with communities

Initial reports from the February meeting suggest that this will be a valuable forum to facilitate information sharing and collaborative working in the region. The participation of other operators in the region is a very positive step towards managing cumulative impacts. However, further consideration is required in terms of other stakeholders that should be involved, either from local communities, authorities and NGOs such as the United Nations Development Programme (UNDP).

10.8.2 Collaboration with Other Operators and other Stakeholders

CBG has provided Ramboll with a list of engagement activities that it undertook during 2017, including:

- Ongoing discussion with Guinean Ministry for the Biodiversity conformity criteria including "Rehabilitation success criteria"
- Participated in the national West African chimpanzee workshop on September 2017
- Formal monthly meetings with COBAD
- Participation at the national workshop on biodiversity metadata in August 2017

- Meeting with the General Director of BGEEE and the Director of Environment Minister on December 2017
- Meeting with GAC Biodiversity Team in December 2017
- Started discussion with Local Youth association for a collaboration around biodiversity awareness
- Internal campaign with CBG management.

10.9 Review and update of the BMS

The July 2017 site visit report recommended that a review of the BMS takes place 6-12 months into the main biodiversity monitoring programmes. Due to their late commencement in January 2018, the review of the BMS is now recommended to be completed before the end of 2018. Ideally, this update would be completed primarily by the CBG Biodiversity Team in-house (possibly with support from an external consultant), so that they have complete ownership of the system going forward. The long-term annual vulture population monitoring of Sangarédi and Kamsar should be included in the updated version of the BMS.

10.10 Piling at the mineral quay

Piling of the new quay was ongoing at the time of the July 2017 site visit and has now been completed. During the piling operations, CBG implemented a mitigation strategy to avoid impacts to cetaceans that included soft starts, avoidance of night-time piling and Marine Mammal Observers (MMOs). According to CBG, no biodiversity incident was observed during piling and dredging activities.

10.11 COBAD Road

At the time of the July 2017 site visit replanting of the restored topsoil was underway with involvement of local communities. A total of 18.6 ha of planting of native tree species, 0.5 ha of Cashew and 4.6 ha of Vetiver *Chrysopogon zizanioides* grass was completed in 2017. Vetiver is native to India, but the most commonly used commercial genotypes are sterile and therefore non-invasive. Based on the inspection made during the February 2018 site visit, the Vetiver grass has established well. Many of the planted trees appear to have survived, although in some areas they have been grazed by goats and may require replacement planting with some form of grazing protection.

Since July 2017, two new bridges have been constructed on the old alignment of the COBAD road for community use. On the northernmost crossing, this replaces a temporary culvert. It is understood that the re-enforced concrete structure of the partially built COBAD bridge will be left in situ, although the river has now been rediverted to its original channel across the foundations of the bridge. It is understood that the temporary river channel will be infilled at this location. At the southern most of the two river crossings, in addition to the new bridge, some reprofiling of the banks has taken place to improve their stability. It is understood that additional ecological restoration is due to take place in 2018 at this location.



Figure 23: Top left and top right– northernmost river crossing of old COBAD alignment, Bottom left – native tree planting, Bottom right – Southern river crossing of old COBAD alignment.

During the July 2017 site visit, significant erosion and sedimentation into rivers from the COBAD road were observed. This situation remains unchanged in February 2018, with exposed banks alongside road cuttings and unstabilised slopes adjacent to watercourses. During the February 2018 site visit, CBG stated that there are plans to complete ecological restoration of these areas once the river bank profiles have been restored (within the CBG concession only).



Figure 24: Slope Vulnerable to Erosion Adjacent to Critical Habitat Watercourse

10.12 Vultures

The November 2016 site visit report discussed that CBG is currently developing a Waste Management Plan that includes improvements to the management of the waste management facilities at Sangarédi and Kamsar. This has the potential to reduce access to waste by the vultures, which could have significant negative impacts on vulture populations. Therefore, it is recommended that the Waste Management Plan needs to address impacts from removal of food source on vultures (particularly at Sangarédi) and appropriate compensation measures.

Ramboll understands that monitoring of vulture populations is included in the contract number EXP1 056, with Guinée Ecologie. Vulture monitoring will take place twice a year (wet and dry season) under this contract in 2018 only. The long-term monitoring will therefore require additional contracts to be agreed.

10.13 Damage to Mangroves

During Ramboll's February 2018 site visit, an inspection was made of the mangrove area adjacent to Torabora waste facility. During this inspection, it was noted that a small area of mangrove had been destroyed due to the emplacement of excavated soil during the construction of the new rail line (Figure 25). Mangrove is a critical habitat and therefore Ramboll recommends that the excess soil is removed and mangrove vegetation is restored in the affected area.¹⁷

¹⁷ Following the site visit, CBG has been informed that actions to restore mangrove have been agreed. This will be the subject of further monitoring by the IESC.

Figure 25: Area of Damaged Mangrove



10.14 Red Colobus Island

During Ramboll's February 2018 site visit, a visit was made to the island within the Cogon River highlighted in the ESIA as supporting West African Red Colobus *Procolobus badius*. The precise location of the island and its relation to the Expansion Project has been raised as a potential concern by one of the Policy Lenders. During the February visit, the CBG Biodiversity Team took GPS coordinates of the island and subsequently located the island within CBG's GIS database. The island was confirmed as being approximately 7 km north of the South Cogon concession. At this location, the River Cogon forms the boundary between the concession of COBAD and CBG's North Cogon. Although impacts to the colobus from the CBG's operations in South Cogon are unlikely, CBG's Biodiversity Team has indicated that they will raise the concern with COBAD and offer advice and assistance to support appropriate mitigation measures. CBG chimpanzee monitoring programme will provide additional information on the distribution and abundance of this species.

Table 10-1: Summary of Findings, PS6

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion)
Feb 2018 _024	Resources	Training requirements within the Biodiversity Team	Construction and Operations PS1/PS6	The Biodiversity Team would benefit from additional training to build up their skill and experience base.	Moderate (Minor if training plan is approved)	Open The team will require additional training on an ongoing basis. The staff training plan should be implemented.
Feb 2018 _025	Resources (equipment)	Delivery of the BMS has also been hampered by a lack of vehicles and equipment.	All / PS6	Any outstanding procurement issues for equipment for the biodiversity team need to be resolved.	Moderate	Open Access to large plant to finish COBAD restoration to be confirmed
Feb 2018 _026	Resources	The organisational structure of the Biodiversity Team residing in the Expansion Project HSEC team potentially reduces ability to implement change in CBG operations.		The Biodiversity team is situated within the Expansion Project HSEC team. It is clear that to effect significant changes to the environmental management of the mine, the Expansion Project capabilities and knowledge need to be transferred to the mine operations. This may require organisational restructuring. However, in the short term it is recommended that the biodiversity team efforts are more fully targeted to Sangarédi rather than Kamsar.	Moderate	Open

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion)
Feb 2018 _027	Resources	The Biodiversity Manager is approaching the end of his 2-year contract.	All / PS6	Ensure contract is either extended or transition and recruitment is carefully managed to ensure continuity.	High (changed from low due to reducing timeframes)	Open
Feb 2018 _028	Plateau-by-plateau management units	The integration of biodiversity constraints into the mining plan has started, but key aspects are delayed or awaiting other studies (e.g. Water Management Plan).	All / PS6	The development of plateau-by-plateau management units are a priority and need to be updated as soon as additional information becomes available from other studies to ensure adequate protection is provided particularly to springs, watercourses and chimpanzee hotspots.	High	Open The constraints protocol and spatial landscape restoration plan needs to be incorporated
Feb 2018 _029	Plateau-by-plateau management units / Réhabilitation 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.	Moderate	Open
Feb 2018 _030	Routine Environmental Inspections	Inspection proforma does not systematically capture all of BMS requirements.	All / PS6	Update and enhance proforma and train environmental inspectors in relation to BMS aspects.	Minor	Open
Feb 2018 _031	Land Disturbance Permit	Land Disturbance Permit (LDP) proforma does not	All / PS6	Update proforma.	Minor	Open

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion)
		systematically capture all of BMS requirements.		HSEC team to monitor uptake of the LDP Procedure by CBG operations and record any instances of works not covered by a LDP.		
Feb 2018 _032	Ecosystem Services and Stakeholder Engagement	Engagement with local communities by the biodiversity team is currently done on an ad hoc basis. Aspects of BMS relating to ecosystem services such as hunting, fuelwood behind schedule.	All / PS6	Develop an engagement strategy that identifies the objectives, identifies the target audiences and methodologies to be employed.	Moderate	Open Although this issue has largely been addressed through the initiation of the forest conservation programme, immediate focus is required in relation to human-wildlife conflict at Kagnaka.
Feb 2018 _033	Review and update of the BMS	Need to agree BMS review process.	All / PS6	It is recommended that a review takes place 6-12 months into the main biodiversity programmes (before March 2018). It is recommended that the composition of the NVIVP is discussed with the Lenders.	Minor	Open

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion)
						Note that the biodiversity programmes started late and therefore update of the BMS is now recommended before the end of 2018
Feb 2018 _034	Critical Habitats: fish	CBG have proposed that gallery forest is used as habitat proxy for fish.	All / PS6	Ramboll recommends that this issue is discussed further with the Policy Lenders to agree the approach.	Minor	Open
Feb 2018 _035	Critical Habitats: Mangrove	An area of mangrove has been destroyed due to the emplacement of excavated soil during the construction of the new rail line at Kamsar.	All / PS6	Ramboll recommends that the excess soil is removed and mangrove vegetation is restored in the affected area.	Moderate	Open
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.	Minor	Open
Feb 2018 _037	Monitoring Studies and on-site offset	Budget and commitment to long-term programme	All / PS6	The initial community forest programme is set for a 2-year period. However, operational budgets for 2019-2023 are due to be set in 2018. It is vital that interim findings of Sylvatrop surveys are obtained	Moderate	Open

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion)
				and used to inform a provisional long-term programme and appropriate budget allocation.		

11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

11.1 Cultural heritage management documents

On 31 March 2107, CBG submitted a Cultural Heritage Management Plan (CHMP) and Chance Finds Procedure (CFP) to Lenders/IESC. Subsequently, Lenders/IESC submitted comments to CBG. During the July 2017 IESC monitoring visit, the IESC's Social Specialist was asked to meet with CBG and an EEM Social Specialist to discuss some to the comments and the best way to address them in revisions of the CHMP and CFP. Subsequently, a meeting was held on Monday, 3 July 2107. Agreement was reached on the way forward and CBG confirmed that the revised and final version would be submitted by 31 July 2107. To date, the IESC has not received the final version of the CHMP and the CFP.

APPENDIX 1 AUDIT ITINERARY

CBG Expansion Project IESC Monitoring trip – 19th to 23rd February 2018

Expansion Project				
		Environment	Social	Biodiversity
Day 1	Mon 19 Feb	Travel to Guinea RE arrive AF724 at 1810h from Paris	Travel to Guinea RE arrive AF724 at 1810h from Paris	Travel to Guinea RE arrive AF724 at 1810h from Paris
Day 2	Tue 20 Feb	Morning - Travel to site - Opening meeting	Morning - Travel to site - Opening meeting	Morning - Travel to site - Opening meeting
		Afternoon - Kamsar offices (env discussions) - ESMP integration - RAP discussions WMP with RA at 1500h Overnight: Kamsar	Afternoon - Kamsar offices (Social discussions) - ESMP integration - RAP addendum Overnight: Kamsar	Afternoon - Kamsar offices (biodiversity discussions) - ESMP integration - BMP implementation - Database, GIS, plateau by plateau management committee Overnight: Kamsar
Day 3	Wed 21 Feb	Kamsar Morning - Tour of construction activities (jetty, crusher etc)	Morning Travel to Sangaredi - Meet Hamdallaye and Fassalle Foutebhe	Morning - Travel to Sangaredi - Biodiversity management - Reinstatement - Water management
		Afternoon - Oil spill area - Discuss ERPs Overnight: Kamsar	Afternoon - As above Overnight: Sangaredi	Afternoon - As above Overnight: Sangaredi
Day 4	Thur 22 Feb	Kamsar Morning - Offices to discuss management plans - ERP (non oil) - MoChange - Waste management - Hazardous materials - Noise and Vibration MP - Air Quality MP	Sangaredi COBAD Road: - Resettlement Update (HHW, widow/children and nearby cluster of 7 huts) - Access/infrastructure provision for Boulléré and Fassaly Foutabhé Water Abstraction and dust suppression	Sangaredi Field Inspection: Update on Etudes de Gestion de Forêt, Herpetology and vegetation monitoring. Kagnaka Spring head
		Afternoon - MRCP - COBAD Road - Close out meeting Overnight: Kamsar	Afternoon As above Travel back to Kamsar Overnight: Kamsar	Afternoon As above Travel back to Kamsar Overnight: Kamsar
Day 5	Fri 23 Feb	Morning 07.30 Lenders leave for Conakry (move close out meeting to 1800 on Thursday if this is not realistic) Afternoon - CH, RB, PB Kamsar offices to discuss other issues		

APPENDIX 2

PROJECT DOCUMENTATION MADE AVAILABLE FOR REVIEW

Ref no.	Document Title	Organisation
1	Méthodologie pour la cartographie des contraintes environnementales et sociales, 10 novembre, 2017	EEM
2	Operational and budgetary implications to the Project: "Implementation of Permanent Plots for Flora and Vegetation Monitoring in the South Cogon Part of the CBG Concession" caused by the enforced evacuation from Sangaredi in November 2017 and the remobilization of the project in 2018.	MBG
3	Compte Rendu de la Réunion / Minutes of Meeting: Atelier d'échange sur la biodiversité, 018-02-08	CBG
4	Permis – Plan de Perturbation du sol: Thiapikoure, 15/12/2017	CBG
5	Permis – Plan de Perturbation du sol: Route Boullere Sangaredi, 21/082017	CBG
6	Formulaire d'Inspection HSEC / HSEC Inspection Form: TRAVAUX DE CONSTRUCTION DE LA ROUTE COMMUNAUTAIRE DE HAMDALAYE, 12/02/2018	CBG
7	Compte Rendu de la Réunion et de la Visite / Minutes of Meeting: Sensibilisation des travailleurs de Henan Chine sur le mélange de la terre noire de déblai, 29/01/2018	CBG
8	BIODIVERSITY ANNUAL REPORT – DECEMBER 2017	CBG
9	PLAN STRATEGIQUE DE REHABILITATION DE 5 ANS 2018- 2023	CBG
10	THEMES DE FORMATION de L'EQUIPE ET DES PARTIES PRENANTES	CBG
11	Registre suivi des doléances communautaire	CBG
12	Registre suivi des plaintes communautaires	CBG
13	Registre suivi des consultations communautaires	CBG
14	Les villages de la mine de la concession CBG touchés par les sensibilisations ou les consultations	CBG
15	Les villages du corridor chemin de fer et du port de la concession CBG touchés par la sensibilisation ou consultation	CBG
16	<i>Rapport de Synthèse: Relocation des Hameaux de Kankalaré – Route Minière Parawi-Koobi</i>	CBG

APPENDIX 3

STATUS OF ISSUES IDENTIFIED IN PRECEDING MONITORING VISITS

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
July 2017 _001	HSEC Resources – HSEC Manager	The Expansion Project does not have a dedicated HSEC Manager in post. Instead HSEC Manager duties are being split between other members of staff and CBG's environmental consultant (EEM) distracting individuals from their primary focus.	All / PS1 ESAP row 28	Appointment of a HSEC Manager to replace the previous HSEC Manager.	High	Closed (replacement HSEC Manager appointed)
July 2017 _002	Contractor management	According to Attachment S of Fluor contractual agreement, responsibility for informing Contractors about specific mitigation measures listed in the ESMP falls to CBG. The mechanism for communication between CBG and Fluor's sub-contractors needs to be further understood by the IESC. The IESC was informed that clear instruction listing specific mitigation measures applicable to each contractor, had not been provided to Fluor. Consequently, there is a danger that some mitigation measures are not being communicated and implemented.	Construction / PS1	The mechanism for making contractors aware of specific mitigation measures needs to be clarified.	Moderate	Closed (informed that Fluor received the ESIA)
July 2017 _003	ESIA Report Addendum for Expansion Project	The IESC was not formally notified of the need for an addendum to the Expansion Project ESIA Report.	Planning / All PSs	Future changes with potential for material environmental and/or social	Minor	Closed (no action required – see comments on MoC procedure)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
				implications should be formally notified via the MoC Procedure.		
July 2017_004	Constraints mapping	The concept of constraints mapping has not progressed since the previous site visit due to other priorities and resource constraints.	Operations/ PS1, PS3, PS4, PS6	It is recommended that resource is provided to action this initiative such that the Mining Engineering Department is given clear guidance about E&S constraints an additional mitigation measures that might be required for specific locations before mining is allowed.	High	Superseded (see Feb2018_28 and 29)
July 2107 005	Community Grievance Mechanism	The analysis of grievances does not yet include categories of grievances.	Construction and operations / PS1	Analyse existing grievances and create a set of categories into which they fall. Allocate all grievances and those to be received in the future to these categories and include the results with the other data already presented to management.	Minor	Closed (Analysis of grievances now includes a classification of grievances by type)
July 2017_006	Community Grievance Mechanism	Legacy (2105 and 2016) non-closed grievances	Construction / PS1	Close out all legacy grievances by 31 December 2017.	Moderate	Superseded (see Feb 2018_004)
July 2017_007	Emergency planning	Based on a preliminary review of the Emergency Response Plan (ERP) provided on the 30 th June 2017, it is the IESC's opinion that the ERP is a framework document. Consequently, the requirements of the ESAP for operationalised plans has not been satisfied.	All / ESAP	Expedite preparation of operationalised Emergency Response plans by: <ul style="list-style-type: none"> Utilisation of Fluor ERPs; and Commissioning of specialist consultancy firm to produce the plans. 	Moderate	Superseded (see Feb 2018_005)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
July 2017 _008	Management of Change	The MoC Procedure is a direct requirement of the lenders as specified in the ESAP. The Procedure has not been shared with EPCM Contractor nor rolled out more widely across CBG's activities. Failure to implement the MoC Procedure is a non-compliance requiring immediate corrective action.	Construction /PS1, ESAP	The MoC Procedure should be rolled out across CBG's activities. Furthermore, it should be shared with Fluor for dissemination amongst Fluor and sub-contractors.	High	Superseded (see Feb 2018_006)
July 2017 _009	Accommodation Provision	No final version of the Worker Accommodation Design Plan has been submitted to Lenders/IESC.	Construction and Operations/ PS2	Prepare, approve, disseminate and implement the final Worker Accommodation Design Plan.	Minor	Open (status unchanged since July 2017 report)
July 2017 _010	Occupation Health and Safety practices - operations	Several examples of poor practice were observed. Continuous reinforcement of H&S is required.	Operations / PS2	CBG operations should learn from some of the good practice observed by Expansion Project contractors. Measures to reduce slippery surfaces on the mineral quay during rainfall should be explored, for example, more frequent recovery of accumulated dust. Refresher training (or in certain cases sanctions) for those found to breach H&S rules.	Moderate	Ongoing (a more detailed H&S audit should be performed following integration of Operations and Expansion Project MS)
July 2017 _011	Water Treatment at Sangarédi	The Water Treatment plant at Sangarédi is poorly managed and unlikely to be functioning efficiently.	All	CBG should undertake a comprehensive review of the WWT including: <ul style="list-style-type: none">- Operational parameters- WWT plant management	Moderate	Open (see also Feb 2018_008)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
				<p>- Plant efficiency and effluent discharge quality</p> <p>Based on this work a clear plan, inclusive of budgetary requirements for additional manpower and plant upgrades to bring the WWT in line with IFC guidelines, should be developed.</p> <p>Timeframes for this action should be independent of the Water Management Plan.</p>		
July 2017 _012	Surface water drainage (Kamsar)	Ongoing discharge of water following treatment at the oil water separator (Kamsar) that is unlikely to comply with IFC effluent quality limits.	Operations	<p>Confirm indicative results and the visual observations with future monitoring of effluents and undertake necessary actions to bring effluent quality back into compliance with IFC standards.</p> <p>Pending monitoring results, upgrade surface water drainage with silt traps/basic oil water separators.</p>	Moderate	Ongoing (see also Feb 2018_009)
July 2017 _013	Surface water drainage (Sangarédi)	Evidence of oil contamination in drainage channels within the Sangarédi maintenance workshop area.	Operations	<p>Improved HSEC site inspections including close inspection of drainage channels.</p> <p>Water quality should also be routinely monitored at suitable locations such as the discharge at the boundary of the site and outlet of the oil water separator. Remediation of pooled oil and contaminated soil is necessary.</p>	Moderate	Ongoing

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
July 2017_014	Fuel contaminated areas	Evidence of fuel spills was noted during a visit to the fuel unloading area at the Sangarédi power station.	Operations	CBG should undertake an inspection of all its main fuelling areas, remediate contaminated areas where necessary and put in place improved design and fuelling practices (hard standing, bunding and spill kits) to prevent further reoccurrence.	Moderate	Open (pending a second visit by Ramboll to the location)
July 2017_015	Waste management	CBG currently does not a facility to manage all it hazardous wastes. Expansion Project contractors are stockpiling hazardous waste as a temporary solution.	All	Following the loss of Tora Bora as a potential site for a hazardous waste facility the need to identify a suitable a location for a hazardous waste facility is an increasing priority.	Moderate	Superseded (following a change in waste strategy - see Feb 2018_013)
July 2017_016	Environmental monitoring - noise	Baseline noise monitoring has been put on hold because the 48 hours continuous monitoring requirements specified in IFC guidelines cannot be achieved in the wet season. This in turn is delaying finalisation of the Noise and Vibration Management Plan.	All	CBG's environmental consultants should use best efforts to gather useable baseline noise data in the wet season even if the 48 hours of continuous monitoring is not achievable and progress the Noise and Vibration Management Plan accordingly.	Moderate	Closed
July 2017_017	COBAD Road	Construction phase mitigation measures specified in draft version of the COBAD Road ESIA Report have not been implemented. COBAD has not committed to implement and/or pay for	Construction and operations	CBG should finalise the draft COBAD Road ESIA Report and in doing so confirm the parties responsible for financing and implementation of the mitigation measures.	High	Superseded (see Feb 2018_014)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
		future Operations Phase mitigation measures.				
July 2017 _018	Railway safety	Co-ordination of railway safety campaign.	Construction and Operation / PS4	The Railway and Community Relations Departments to strengthen co-ordination efforts so that one well-supported and clearly-focused campaign on railway safety is implemented.	Moderate	Closed CFB and the CR team have been working (Q3 and 4, 2017) and continue to work jointly on implementation of the MUA
July 2017 _019	Security Management Plan	Preparation of revised and final version of the Security Management Plan.	Construction and Operation	Prepare and approve a revised and final Security Management Plan which is aligned with good international industry practice (including the Voluntary Principles on Security and Human Rights and other international requirements and guidance) and which takes account of the threats that may be posed in the future by social unrest which, compared to the recent events, has escalated in scale and intensity and is aimed at CBG specifically. Dissemination and implementation of the Security Management Plan as soon as it is approved internally.	Moderate	Superseded (see Feb 2018_015)
July 2017 _020	Community Health and Safety	Preparation of revised and final version of the Community Health and Safety Management Plan.	Construction and Operation	Prepare, approve, disseminate and implement the revised and final Community Health and Safety Management Plan	Moderate	Open (status remains unchanged since July 2017)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
	Management Plan			The plan should include consideration of non CBG traffic on the haul roads and newly created steep sided slopes.		
July 2017 _021	Relocation of Hamdallaye Village	There has been a delay to the date for relocation of Hamdallaye village.	Construction	Devote sufficient resources to ensure the procurement and <u>contracting</u> of CBG's delivery partner/s as soon as possible and provide an enabling environment to allow the implementation of the Livelihood Restoration Programme to begin as soon as possible.	Moderate (increasing to High if contracts are not in place by end of October 2017)	Closed (Contracts are now in place)
July 2017 _022	Access to agricultural land for new Hamdallaye site	Safe access to agricultural lands – in particular, the N'Dangara and Démourou areas – is required for Hamdallaye villagers.	Construction	Senior management to confirm that the current option for provision of access is approved, as quickly as possible, and that finance and personnel resources are available to provide the manpower to manage the road/rail crossing effectively.	Moderate	Superseded (On the understanding that CBG management has accepted manned crossings – see Feb 2018_018)
July 2017 _023	Provision of shade for new Hamdallaye village site	Planting of acacia <i>spp</i> in 2107 wet season.	Construction	Ensure planting is begun and completed to plan in the 2017 wet season.	Moderate	Superseded (Planting of acacia <i>spp</i> occurred and failed – see Feb 2018 019)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
July 2017 _024	Security of tenure for Hamdallaye villagers	Provision of confidence to Hamdallaye villagers that they will not be relocated again.	Construction	Ensure that an appropriate legally binding mechanism is found to ensure that CBG cannot relocate the village again due to a change in mine planning.	Moderate	Superseded (Nearby bauxite reserves were either mined in 2017 or removed from the bauxite reserves – see Feb 2018_020)
July 2017 _025	Community asset replacement for Fassaly Foutabhé villagers	New school needs to be formally and officially approved by Government and requires pupils from Mbouroré to make it viable.	Construction	Maintain and strengthen efforts to obtain agreement of Mbouroré villagers and the formal/official approval of Government.	Moderate	Superseded (by Feb 2018_021)
July 2017 _026	Change in mine plan	Land take for mine operations in near future requires relocation of Kankalaré hamlets in 2018 and thus swift action is needed to prepare the Resettlement Action Plan.	Construction	Prepare RAP in near future Update Resettlement Policy Framework in near future	Moderate (increasing to High if RAP not in place by at least 3 months prior to RAP implementation)	Superseded (by Feb 2018_022)
July 2017 _027	Post of Manager for Compensation and Community Relations	The staff member allocated to this post currently does not report to the Resettlement Manager.	Construction and Operations	The role of the Manager for Compensation and Community Relations to be formalized as soon as possible.	Minor	Closed (According to the RAP Project organogramme, of 20 February 2018, the Compensation

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
						and Community Relations Manager reports directly to the RAP Project Manager)
July 2017 _028	COBAD Road	Relocation requirements are not yet clear/decisions not made.	Construction	<p>During finalisation of the ESIA Report for the CBG Expansion Project – Addendum for the COBAD Road: (Revised Draft, June 2017) provide clear statements on which settlements/households require relocation - with justifications.</p> <p>The livelihood strategy followed by the inhabitants of Hairé Hounsiré Woyoh to be determined, by a specific investigation, as an input to decisions/s on potential relocation.</p> <p>Resettlement Action Plan/s and or Livelihood Restoration Plans to be prepared as appropriate.</p> <p>Update Resettlement Policy Framework</p>	High	Closed (Replaced by new item; Feb 2018 016)
July 2017 _029	Access to school for pupils of Kankalaré hamlets and Telli Bofi	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 Telli Bofi does not decline due to relocation of the Hamdallaye school.	Moderate	Open (status remains unchanged since July 2017)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
				Select and implement the preferred option so that no disruption to attendance occurs.		
July 2017_029a	Resources	ESAP item stipulates that CBG employ a dedicated Biodiversity Manager. However, the in-post Biodiversity Manager has been diverted away from implementing the BMS.	All / PS6	The Biodiversity Manager's time needs to be refocussed back to implementing the BMS and developing the biodiversity team capabilities a matter of urgency.	High	Closed (Biodiversity Manager returned to his biodiversity priorities following the appointment of a replacement HSEC Manager)
July 2017_030	Resources	<p>Delivery of the BMS has also been hampered by a lack of vehicles and equipment.</p> <p>The organisational structure of the Biodiversity Team residing in the Expansion Project HSEC team potentially reduces ability to implement change in CBG operations.</p>	All	<p>The Biodiversity team would benefit from additional training to build up their skill and experience base. This would be best delivered by the CBG Biodiversity Manager, and particularly through spending more time in the field at Sangarédi.</p> <p>Any outstanding procurement issues for equipment for the biodiversity team need to be resolved.</p> <p>The Biodiversity team is situated within the Expansion Project HSEC team. It is clear that to effect significant changes to the environmental management of the mine, the Expansion Project capabilities and knowledge need to be transferred to the mine operations. This may require organisational restructuring. However, in the short term it is recommended that the</p>	Currently, High (until resources are adequately provided)	Superseded (see Feb2018_024, 025 and 026)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
				biodiversity team efforts are more fully targeted to Sangarédi rather than Kamsar.		
July 2017 _031	Resources	The Biodiversity Manager is currently one year through a 2-year contract.	All	Ensure contract is either extended or transition and recruitment carefully managed to ensure continuity.	Currently Minor (moderate in the future if not implemented)	Superseded (see Feb 2018_027 where the significance rating has been raised to High)
July 2017 _032	Monitoring Studies and on-site offset	CBG is currently conducting a tender process for a suite of monitoring studies and initiation of the on-site offset.	All	Contracts for monitoring studies and the forest conservation programme need to start by the end of July 2017 to avoid any further delays.	Moderate (increasing to High if contracts are not initiated by end of July 2017)	Closed
July 2017 _033	Plateau-by-plateau management units	The integration of biodiversity constraints into the mining plan has started, but key aspects are delayed or awaiting other studies (e.g. Water Management Plan).	All	The development of plateau-by-plateau management units are a priority and need to be updated as soon as additional information becomes available from other studies to ensure adequate protection is provided particularly to springs, watercourses and chimpanzee hotspots.	High	Superseded (see Feb 2018_028)
July 2017 _034	Routine Environmental Inspections	Inspection proforma does not systematically capture all of BMS requirements.	All	Update and enhance proforma and train environmental inspectors in relation to BMS aspects.	Minor	Open (status remains unchanged since July 2017)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
July 2017 _035	Land Disturbance Permit	Land Disturbance Permit (LDP) proforma does not systematically capture all of 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.	Minor	Open (status remains unchanged since July 2017)
July 2017 _036	Ecosystem Services and Stakeholder Engagement	Engagement with local communities by the biodiversity team is currently done on an ad hoc basis. Aspects of BMS relating to ecosystem services such as hunting, fuelwood behind schedule.	All	Develop an engagement strategy that identifies the objectives, identifies the target audiences and methodologies to be employed.	Moderate	Superseded (see additional commentary in Feb 2018_032)
July 2017 _037	Review and update of the BMS	Need to agree BMS review process.	All	It is recommended that a review takes place 6-12 months into the main biodiversity programmes (before March 2018). It is recommended that the composition of the NVIVP is discussed with the Lenders.	Minor	Superseded (see additional commentary in Feb 2018_033)
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.	High	Open (Progress has been made since July 2017 on restoration, but additional works are still required)
July 2017 _039	Vultures	Potential impacts to vultures from improved waste management.	All	Monitoring of vulture populations to be included in the BMS. This could be addressed simply through an annual	Minor	Open

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion)
				vulture count in Sangarédi and Kamsar.		(Should be closed out during update of BMS)
July 2017 _040	Cultural Heritage Management Plan and Chance Finds Procedure	Cultural Heritage Management Plan and Chance Finds Procedure.	Construction and Operation	Prepare, approve, disseminate and implement the revised and final Cultural Heritage Management Plan and Chance Finds Procedure.	Minor	Open (status remain unchanged since July 2017)

APPENDIX 4 PHOTO LOG



Photo 1. Bauxite crusher pit (foreground) with existing crusher in the background



Photo 2. Primary crusher pit – manned access scaffolding on the far side



Photo 3. Primary crusher pit – installation of steel work



Photo 4. Working at height – good use of harnesses



Photo 5. Exit ramp from the primary crusher pit to secondary crusher



Photo 6. Temporary waste storage area behind secondary crusher – empty drums



Photo 7. Waste solvents in a sealed container – strong solvent vapours

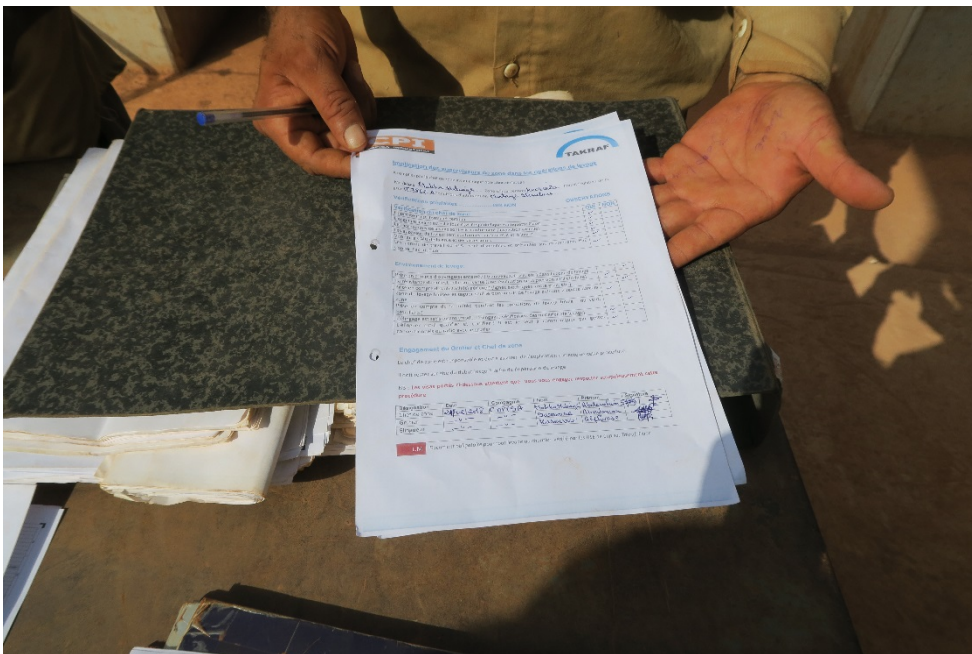


Photo 8. Permit to work documentation



Photo 9. Use of flag man with large plant to mitigate restricted vision



Photo 10. Tora bora waste facility – disposal of domestic waste following decision not to use Bendougou landfill



Photo 11. Tora bora waste facility – evidence of tyre burning



Photo 12. Continuous air quality monitoring equipment



Photo 13. Monitoring equipment in secure container



Photo 14. Extended jetty with original jetty in the background – awaiting construction of conveyor



Photo 15. CBG office at end of the jetty - piles for GAC jetty in the background



Photo 16. Diesel locomotive (SD40 model)



Photo 17. Drainage ditch adjacent to locomotive fuelling area – heavily contaminated with oil



Photo 18. Bin containing oily wastes at locomotive workshop



Photo 19. Drip tray used when draining filters – full to capacity

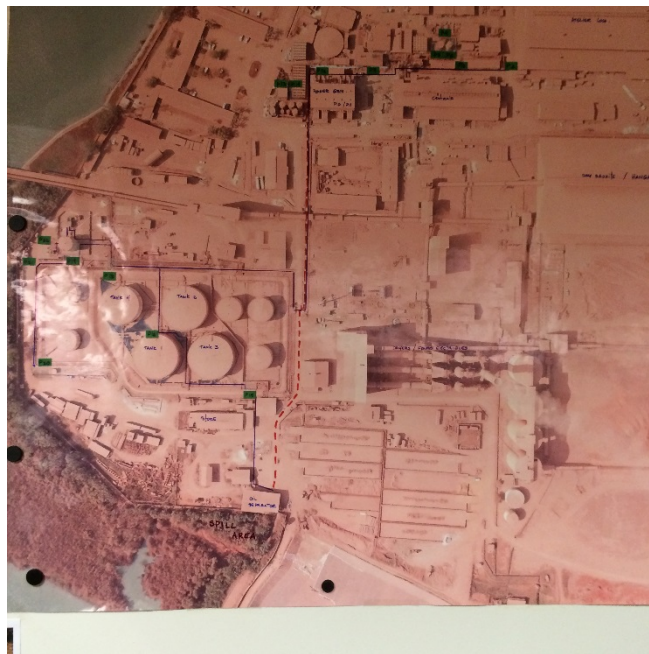


Photo 20. Aerial photo of Kamsar facilities – red dotted line indicates source of oil release



Photo 21. Container with oil spill response equipment – access blocked by parked cars



Photo 22. Container with oil spill response equipment – unable to open door/approach with lifting equipment due to parked car



Photo 23. Heavy duty oil boom – suitable for offshore



Photo 24. Oil spill dispersant procured by CBG



Photo 25. Oil spill dispersant – 300 litres of dispersant used in recent spill



Photo 26. Temporary storage of recovered oily waste following clean up of the creek



Photo 27. Location of the oil discharge - post clean up



Photo 28. Discharge from the main oil and water separator – note orange discolouration



Photo 29. Air emissions during start up of power generating unit following a trip



Photo 30. Temporary storage of oil during malfunctioning of oil/water separator. Bund wall removed to allow access.



Photo 31. Oil boom left in place in case of oil release from main oil water separator. Evidence of earlier oiling on the boom. Potential discolouration of water



Photo 32. Residual oil visible on mangrove branches and boom.