

Intended for

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.

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

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CONTENTS

GLOSSARY OF TERMS/ ACRONYMS

EXECUTIVE SUMMARY

I

1. INTRODUCTION

1

2. SCOPE AND STRUCTURE OF THE REPORT

4

2.1 Scope of the monitoring visit

4

2.2 Summarised itinerary

4

2.3 Project standards

5

2.4 Structure of the report

5

2.5 Limitations

6

3. PROJECT STATUS

7

3.1 Status of the Expansion Project at time of the audit

7

4. SIGNIFICANCE ASSESSMENT

9

4.1 Review findings

9

4.2 Assessment of significance

9

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

11

5.1 Management systems

11

5.2 HSEC responsibilities and resources

12

5.3 HSE Performance

13

5.4 Environmental and Social Impact Assessment

15

5.5 Environmental and social management plans

15

5.6 Plateau-by-plateau approach – in practice

16

5.7 Stakeholder engagement

17

5.8 Grievance mechanism

17

5.9 Emergency planning

18

5.10 Security Management Plan

18

6. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS

22

6.1 Introduction

22

6.2 Employment and employees

22

6.3 Workers' accommodation

22

6.4 Workers' Grievance Mechanism

23

6.5 Occupational health and safety

23

6.6 Management of contractor labour and working conditions

23

7. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

26

7.1 Introduction

26

7.2 Water management

26

7.3 Oil spill

27

7.4 Waste management

28

7.5 Air quality

29

7.6 Noise

30

7.7 Environmental monitoring

30

7.8 Mine Reclamation and Conceptual Closure Plan

32

7.9 COBAD Road

33

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

36

8.1 Community Health and Safety Management Plan (CHSSMP)

36

8.2 Railway safety

36

8.3 Security

37

9.	PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT	38
9.1	Introduction	38
9.2	Kankalaré Haul Road and Parawi-Koobi Plateau Resettlement: Status Summary	38
9.3	Hamdallaye and Fassaly Foutabhé RAP: Outstanding Non-Budgeted Actions	42
9.4	Hamdallaye and Fassaly Foutabhé: Recent/Current Situation	43
9.5	Livelihood Restoration	47
9.6	Resettlement Implementation: Institutional Capacity	48
9.7	COBAD Road: Land Acquisition and Involuntary Resettlement	49
9.8	Past-Compensation Measures and Grievances Close-Out	50
10.	PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES	54
10.1	Introduction	54
10.2	Resources	54
10.3	Biodiversity Monitoring Studies and On-Site Offset	55
10.4	Creation of plateau-by-plateau management units	57
10.5	Rehabilitation Plan	57
10.6	Routine environmental inspections	59
10.7	Ecosystem services and stakeholder engagement	59
10.8	Review and update of the BMS	60
10.9	COBAD Road	61
10.10	Vultures	64
10.11	Damage to Mangroves	65
10.12	Guildhé Island (formerly referred to as 'Red Colobus Island')	65
11.	PERFORMANCE STANDARD 8: CULTURAL HERITAGE	68
11.1	Cultural heritage management documents	68

APPENDICES

Appendix 1

Audit Itinerary

Appendix 2

Project Documentation made available for Review

Appendix 3

Status of Issues Identified in Preceding Monitoring Visits

Appendix 4

Photo Log

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
NGO	Non-Governmental Organisation
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
TPE	Toute Petite Entreprise
WBG	World Bank Group
WWT	Waste Water Treatment

EXECUTIVE SUMMARY

In late November/early December 2018¹ (hereafter December 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 Lenders², visited the Compagnie des Bauxites de Guinée (CBG) bauxite mine in Guinea to monitor the environmental and social performance of the Phase 1 Expansion Project.

The December 2018 visit followed the third monitoring visit by Ramboll (Ramboll is used interchangeably with IESC hereafter) which occurred in February 2018. During the December 2018 visit, Ramboll was joined by representatives of the Policy Lenders, namely representatives from the International Finance Corporation (IFC) and OPIC³. A three-person team from Ramboll assessed CBG's Health, Safety, Environment & Social (HSE&S) performance associated with: the Expansion Project (construction); ongoing operations; and to a more limited extent, 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;
- Progress towards incorporation of operations within the suite of management plans; and
- Follow-up on those 'open' issues identified during previous site visits.

Specific elements of HSE&S performance were prioritised for review prior to the trip. In particular, resettlement of affected villages in the mining areas was a key focus. 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 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 ESA. A total of 32 findings were identified during the monitoring visit. Of these 2 are considered High; 17 are Moderate significance and the remainder considered to be of Minor significance. The High and Moderate findings relate to the timing/urgency/compliance of necessary actions as follows:

High significance findings

- 1 *Construction of Parawi-Koobi haul road.* A PS5-compliant Resettlement Action Plan is required for the Kankalaré residents affected by the Parawi-Koobi haul road. Prepare PS5-compliant RAP within timescale stipulated in section 13 of the 09 November 2018 version of

¹ The monitoring visit was conducted from 29th November to 3rd December 2018.

² Lenders as defined on the cover page of this report.

³ UFK decided not to participate in this monitoring visit

the Resettlement Action Plan. As the timescale is short, CBG to accelerate the procurement of an external consultant to prepare the PS5-compliant RAP. Update Resettlement Policy Framework in near future.

- 2 *Implementation of strategy of land-for-land for certain Hamdallaye residents.* CBG to proceed to implement the strategy taking into account the results of the soil suitability survey and resulting consultations with the affected people. If soil proves unsuitable (and cannot be rectified) and/or affected people reject the strategy, then alternative PS5-complaint compensation must be provided.

Moderate significance findings

- 1 *Delays in salary payments to contracted workers.* On occasions during Phase 1 of the Expansion Project, some workers experienced delays in receiving these payments. CBG to liaise with Fluor to determine lessons learnt regarding delayed payments and, as necessary, refocuses its approach to manage contractors so that it can reduce the likelihood of such occurrences in the future.
- 2 *HSE practices* - Two significant H&S observations were made during a visit to the mining operations around Sangaredi: i) Use of vehicles in active mining areas without warning flags; and ii) Poor H&S practices at a bridge construction site. The IESC recommends regular refresher training and an internal audit of mine vehicles to ensure whip and flags are available on all vehicles entering active mining areas and further effort and H&S presence is afforded to remote locations/relatively small construction sites.
- 3 *Diving practices.* A detailed incident report following the death of a diver in CBG's port concluded that the diver was not authorised or trained to undertake the task and recommends a number of actions to prevent further unauthorised tasks. This represents a significant failure to follow safety procedures. The IESC recommends CBG undertakes a detailed review of its procedures and practices for diving, and in this respect supports the corrective and preventative actions listed in the incident report. Job Safety Analysis and stringent application of the Permit to Work (PTW) procedure is essential. Consideration should be given to a bespoke diving PTW.
- 4 *Site evacuation briefing* - The HSEC briefing given to the IESC and Policy Lenders did not include information about site evacuation in case of a major security issue. CBG should strengthen its induction procedure(s) to ensure visitors are aware of the procedure to follow in case of a site evacuation.
- 5 *Oil water separator discharge.* Oil concentrations downstream of the oil water separator continue to breach Project Standards. Ongoing efforts to meet discharge standards are required, including reducing release of oil at source. If oil in water standards cannot be met, replacement of the current oil water separator might be required.
- 6 *(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. 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. The IESC was informed that, to date, there had been no sign of re-occupancy occurring.
- 7 *Access to agricultural land for new Hamdallaye site.* Safe access to agricultural lands, in particular the Démourou valley, is required for Hamdallaye villagers. CBG should consult with Hamdallaye Advisory Committee and residents about the intended safe access route and ensure that agreement/validation is reached. Senior management shall confirm that the current option for provision of access has been approved and that finance and personnel resources are available to provide the manpower to manage the road/rail crossing effectively.

- 8 *Provision of shade for new Hamdallaye village site.* Following the failure of the campaign to plant acacia spp in 2017, there is a need to ensure that shade planting occurs. CBG should ensure shade planting is commenced 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.
- 9 *Institutional capacity* - The Resettlement Manager lacks permanent in-house technical support and ability to obtain external support promptly as /when needed. CBG to provide resources, as a priority, to release the Resettlement Manager from implementing a range of technical resettlement tasks thus freeing time to manage current activities and plan for future resettlement actions.
- 10 *Parawi-Koobi Plateau bauxite 'cleaning' and mining.* A Resettlement Action Plan or Livelihood Restoration Plan is required. CBG is awaiting the results of an INSUCO asset and ownership/user study before deciding whether a PS5-compliant RAP or LRP is required for displacement resulting from mining of this plateau.
- 11 *Telibofi (and to a lesser extent, Parawi) villages and returning/relocating people/households* - Returning/relocating people/households will be eligible for livelihood restoration measures. Other villagers (acting as 'hosts' for non-natal individuals/household relocating to the village) will not be entitled if they had no affected assets. This could cause intra-village social tensions. CBG to consider risk of social tensions and if assessed as being likely to occur consider extending livelihood restoration measures to all villagers. *Post-visit Note: CBG has conducted a risk analysis and mitigation measures have been proposed.*
- 12 *Human-wildlife conflict at Kagnaka village.* During the last dry season a conflict arose between villagers and chimpanzees using the nearby spring. CBG has now repaired the village groundwater borehole pump, the water from which is used for drinking, whereas water from the nearby spring is used by women for washing. CBG should continue to monitor human wildlife conflict, especially during the dry season and seek solutions to address any conflicts which might arise, e.g. timings of use could be considered.
- 13 *Rehabilitation Programme* - The mine rehabilitation programme has been delayed by a number of minor issues which could have been overcome. The IESC recommends that focus is maintained and that the programme is properly started in 2019. Clear lines of management need to be established between Mining Operations and the Biodiversity Team.
- 14 *Social team and Biodiversity team cooperation* - CBG should further its current efforts to ensure greater cooperation between the Biodiversity and Social teams in order to address issues which arise and impact on both people and/or threatened species and Critical Habitat and wider biodiversity issues.
- 15 *Boulléré/COBAD Road river crossings* - Exposed river banks have been caused by excavation/construction works. Rehabilitation efforts should continue, to ensure that silty run-off does not occur in the wet season, when further excavation/construction activities are scheduled as part of the restoration of river bank profiles.
- 16 *Community Plant Nursery* - The community plant/tree nursery has become overgrown with weeds and has not been maintained. The contract which covers the Community Nursery programme has expired and one of the nursery plots was overgrown with weeds. The IESC recommends that a maintenance contract is started to ensure these areas are cared for and maintained.
- 17 *Rehabilitation tree stocks* - CBG has been holding a stock of 100,000 trees for more than a year. It is important that a system is developed to ensure timely planting of trees and tree stocks are not held in pots over the dry season (thereby potentially weakening tree saplings).

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 compliance monitoring visit in 2019 (dates to be confirmed) during which the issues identified in this report will also be revisited and the progress in addressing the issues confirmed.

1. INTRODUCTION

Ramboll Environment and Health UK Limited (Ramboll) was commissioned in September 2016⁴ 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 comprised of the 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 a monitoring visit from the 29th November to 3rd December 2018 (hereafter the December 2018 monitoring visit) for the Phase 1 Expansion Project that has included an assessment against Project commitments and 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 existing mining facilities and the Expansion Project facilities. Face-to-face interviews were held primarily with CBG staff including;

- Senior Managers;
- the Health, Safety and Environment (HSE) Team including those responsible for audit programme and environmental monitoring;
- Biodiversity Team;
- Community Relations (CR) Team;
- Resettlement Manager;
- Security Advisor; and
- Human Resources Director.

The IESC also viewed contractors' facilities and had an opportunity to discuss HSE performance.

A team of three from Ramboll, comprising of Chris Halliwell, Phil Rogers and Ron Bisset, accompanied by E&S specialists from IFC and OPIC, 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. Ramboll had last visited the CBG concession in February 2018, and prior to that 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 and resettlement whilst also following up on issues raised in previous site visit reports. More specifically, the trip presented Ramboll with an opportunity to:

- Re-visit the Sangarédi mining facilities;
- Re-visit the Expansion Project construction areas (final construction stages) and gain a good appreciation of ongoing construction activities at the mine and port areas;
- Re-visit the Parawi rail transfer yard operated by COBAD;

⁴ 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 contractors, for example, CANARAIL, Fluor and CECI (the implementing partner for the livelihood restoration programme for Hamdallaye and Fassaly Foutabhé);
- Visit key sensitivities within the concession including critical habitats;
- Visit villages that have or will be relocated or experience economic displacement and meet with Project Affected Persons (PAPs);
- 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;
 - Security;
 - Emergency response planning;
 - Environmental monitoring;
 - Reinstatement of mined areas;
 - Human Resources; and
 - Community Health and Safety.

The IESC team spent 4-6 days on site viewing mining, construction 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 Parawi-Koobi haul road and affected settlements; where one of the Kankalaré hamlets was visited (and where a discussion with a small group of female PAPs occurred) and, also, Telibofi was visited to see the sites being made available, for housing and agriculture, for those Kankalaré PAPs which have decided to relocate in/return to Telibofi. During this visit, there was an opportunity to view the sites for an upgraded access road and a bridge across the nearby railway line – both to be provided by CBG. A section of the Parawi Koobi plateau (where mining is due to begin in 2020) was visited briefly. Finally, a visit was paid to the new Hamdallaye village site to observe and discuss progress on providing infrastructure and housing and, also, to the village of Fassaly Foutabhé where a meeting with a group of community members was held.

Further 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 CBG 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) split into sub teams for most of the visit to focus on the team members' disciplines, namely: i) health safety and environment (excluding biodiversity); ii) social and iii) biodiversity. This report presents key visit findings in sections that align with applicable the IFC Performance Standards. The report makes extensive use of photographs taken during the site visit.

This 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 documents;
- Interviews held with key HSEC staff within CBG;
- Interviews with other CBG functions including a security representative;
- Interviews held with Contractors' HSE representatives and Construction Managers;
- Visit to the new Hamdallaye village site, Fassaly Foutabhé plus visits to one of the haul road-affected Kankalaré hamlets and, also, to Telibofi (village where Kankalaré PAPs have chosen to return to/for relocation). All these visits were accompanied by discussions relating to a wide range of 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 in:
 - Kamsar (primary and secondary crushers, conveyor belts, power station, jetty, rail yard and workshops, waste facilities, water treatment facilities, drainage network and restored areas); and
 - Sangaredi and surrounding areas.

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 27th November and 3rd December 2018. The tasks performed during this period are summarised below and detailed in the audit itinerary (Appendix1).

27 th November	Travel to Guinea
28 th November	Opening Meeting Office based discussions (HSEC resourcing, Project status, H&S performance, ESMS overview, closure of previous findings, HR/Labour working conditions, community relations management and plateau-by-plateau approach)
29 th November	Inspection of Kamsar facilities (HSE team) Resettlement and access – meetings with CBG Resettlement Manager, sous-prefecture representatives, CECI Project Manager, Hamdallaye Resettlement Committee and PAPs (social team)

	Mining areas – offset programmes, biodiversity monitoring programme, implementation of BMS actions, Bauxite Environmental Network discussions, impacts from COBAD Road (biodiversity team)
30 th November	<p>Visit to active mining site, COBAD Road rail transfer station and associated facilities in Sangaredi area (environment team)</p> <p>Resettlement and access - Fassly Foutabhé PAPs, community infrastructure projects, resettlement planning (social team)</p> <p>Mining area – restoration of old COBAD Road alignment, restoration of CBG mined areas, CBG haul roads, community nurseries, sensitive watercourse crossings (biodiversity team)</p>
1 st December	<p>Office based meetings – security management, emergency response, Management of Change Procedure and stakeholder engagement/grievances. Close out meeting with CBG and Policy Lenders.</p> <p>IESC discussion with CBG on Environmental Monitoring programme/results and CBG’s internal audit programme/findings.</p> <p>Further discussion with the CBG HR Director (IESC and OPIC)</p> <p>Discussion with Fluor HR Manager (IESC and OPIC)</p> <p>Further discussion with CBG Resettlement Manager (IESC and OPIC)</p>
3 rd December	Visit to Parawi-Koobi haul road, one of the Kankalaré hamlets and the village of Telibofi to meet PAPs (Kankalaré hamlet) and to meet village chief/elders to discuss provision being made for returning inhabitants and those Kankalaré PAPs decision to relocate to Telibofi (IESC and OPIC).

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 no Indigenous Peoples are affected by the Project.

2.4 Structure of the report

Section 3 provides a brief 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 monitoring visits. 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 February 2018, 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 E&S management plans, have been reported elsewhere.

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 approaching completion scheduled for July 2019 with approximately 1,150 -1,200 construction personnel on site, down 300 from the peak construction workforce with demobilisation of Fluor staff (EPC contract) in progress. Key activities are as follows:

- First ore achieved at the end of October 2018 (first ore 'essential scope' 94% complete with further construction work ongoing prior to full production);
- Commissioning and ramp up is continuing;
- New power generating unit installed and operating in Kamsar (units 15 and 16);
- Modification of rail wagon needed for new tipper 65% complete (400 converted);
- Conveyors installed;
- Construction of new dryer is ongoing and scheduled for completion at the end of March 2019;
- Secondary sizer constructed;
- Extension to the mineral quay (jetty) complete although some repair of old piles required;
- Rail construction is 99% complete;
- Workers' accommodation completed;
- Hamdallaye (new) – construction of infrastructure and housing is advancing in line with the planned relocation period in Q2 2019. To date, 382 structures are under construction (173 houses, 105 toilet facilities and 104 kitchens) plus 10 items of community infrastructure (1 mosque, 1 market, 1 health centre and 1 school with toilet facilities. Eighty houses plus toilets/kitchens are still to be added (see Section 9.4 for more information and photos of structures). A second tree planting campaign is scheduled to commence at the beginning of the rainy season (Q2 2019)⁵.and continue while construction and then relocation of residents occur; and
- Fassaly Foutabhé – work continues to construct the new school (with toilet facilities), accommodation for the school director and 1 Almadjaja (prayer place). Work on planning a new route for access to the RN 3 is also underway.

At the time of the visit (November/December 2018) it was estimated that approximately 87.4% of the Project was complete⁶ with 100% completion expected in July 2019. Figures 1 and 2 provide a visual indication of construction progress. Further construction/facility readiness photos are provided in Appendix 4, photos 1 – 4.

⁵ The most recent version of the Hamdallaye and Fassaly Foutabhé RAP Implementation Schedule (December 2018 update), presented at Figure 7, shows the date for beginning this tree planting as December 2018, but the date has been put back by at least three months.

⁶ Data based on presentation from CBG; slide entitled Project Phase 1 – Construction progress

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



Crusher pit and tippler in foreground, ramp and secondary sizer in the background. Conveyor to existing plant visible.

Figure 2: New rail loop (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 ⁷	Standard	IESC Recommendations	Significance
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities.	Ops	WBG EHS Guidelines ESAP	<i>Company X shall Expedite procurement of monitoring equipment with the support of senior management.</i>	Moderate

⁷ Phases can include: construction; operations; decommissioning or; any combination of these phases.

ID	Aspect	Issue Description	Phase ⁷	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

5.1.1 Certified management systems

Ramboll previously reported that CBG operations had obtained ISO14001, ISO 9001 and OHSAS 18001 certification in 2017. The IESC requested each of these certificates and can confirm the certificates are valid as indicated below.

- OHSAS18001 (Occupational Health and Safety), Certificate number 2017/74563.1 issued by AFNOR for geological prospection, extraction, rail transport, crushing, drying, physico-chemical analysis of bauxite, ship loading and related services. The certificate was issued on 10 March 2017 and remains valid until 9 March 2020.
- ISO9001 (Quality), Certificate number 2017/74564.1 issued by AFNOR for geological prospection, extraction, rail transport, crushing, drying, physico-chemical analysis of bauxite, ship loading and related services. The certificate was issued on 10 March 2017 and remains valid until 9 March 2020.
- ISO14001 (Environmental Management), Certificate number 2017/74565.1 issued by AFNOR for geological prospection, extraction, rail transport, crushing, drying, physico-chemical analysis of bauxite, ship loading and related services. The certificate was issued on 10 March 2017 and remains valid until 9 March 2020.

5.1.2 Audit and Inspection

CBG operates an audit and inspection programme in accordance with its Procedure – Inspections, Auditing, Assessments and Reporting Compliance Procedure, issued in 2014.⁸ The scope of the procedure includes daily assessments by Supervisors, formal workplace inspections, system audits and corporate audits.

The IESC reviewed the CBG audit and inspection programme, findings and progress in closing actions whilst on site and makes the following observations:

- CBG has a schedule for work site inspections. In addition to daily inspections, typically, a more formal/detailed work place/Department inspection is scheduled for each month⁹.
- Directors participate in inspections in accordance with a pre-determined schedule. CBG Directors participated in 12 inspections in September and October 2018 with each Director participating in approximately 1 inspection every 2 months. For 2019, 56 inspections are scheduled that will be shared between 14 Directors. Such inspection demonstrate Senior management commitment to the management of HSE matters and is welcomed by the IESC.
- A spreadsheet is used to record audit/inspection findings that includes a tab for each auditing entity, for example, BGEEE findings. Closure is recorded and outstanding 'high' priority findings discussed during monthly senior management meetings. The findings of the IESC February 2018 site visit report are captured in the spreadsheet (see below).

⁸ Procedure – Inspections, Auditing, Assessments and Reporting Compliance Procedure. Doc ref. CBG_HSEC_RO-1150. Version 1 Issued 01/01/2014

⁹ Based on schedule of inspections specified in the '*calendrier des inspections environnementales*'.

The IESC does not raise any significant concerns with the audit programme, however it does recommend the procedure, issued in January 2014, is reviewed to ensure it reflects current practice. It is noted that a review of the document was scheduled in 2016, but it is unclear whether such a review took place.

5.1.3 Closure of Earlier IESC findings (summary)

The IESC and Policy Lenders were provided with a document indicating the status/corrective action(s) against each of the IESC's earlier findings in the IESC's February 2018 monitoring report. A responsible person has been assigned to each finding and all have been addressed with many now being closed.

Issues identified in the previous site visit were revisited in November/December 2018 and updates are provided throughout this report. Appendix 3.1 - Status of Issues raised in February 2018 site visit report, also provides a consolidated status update by the IESC. Of the 37 issues raised during the previous site visit, all have been addressed with 29 are considered by the IESC to be closed or superseded and 8 are open/ongoing.

5.2 HSEC responsibilities and resources

Since the earlier site visit in February 2018 there have been a number of personnel changes within the HSEC team including the loss of key expatriates. Notable new recruits/changes of position include:

- Isabelle Teboul fulfilling the role of HSEC Director (*post-visit note: she has since resigned at end December 2018*);
- Serge Darroze fulfilling the role of Lead Biodiversity Specialist; and
- Aliou Barry, HSE Operations Chef de Service.

The IESC was further informed that CBG is adopting a policy of promotion internally (subject to probationary periods). In parallel to internal promotions, CBG is also interviewing expatriate candidates, including a replacement for Gilles Panella (to fill the role of HSE Lead for Construction) and Patrick Corriveau (Environment and Monitoring Team leader). Additional staff will also be recruited in 2019 to support the Resettlement, Community Relations and Biodiversity leads, thereby extending internal capabilities to manage existing and future challenges.

Previous plans to merge the environmental and biodiversity teams have been revised and these functions will remain separate with separate leads.

The IESC notes that the turnover of key HSEC staff is disruptive and a risk for CBG, and reinforces the need for CBG to continue its efforts to reduce turnover rates and thereby improve continuity of knowledge and HSEC direction.

5.2.1 Community Relations

The Community Relations (CR) team remains stable and effective under the leadership of the CR Manager. It is pleasing to note that the CR Manager's contract has been renewed for 1 more year up to 23 September 2019. During the monitoring visit it became clear that continuing and new challenges are stretching the CR team's resources and effectiveness in some areas of work, for example, ability to reach targets for community sensitization within the context of implementing the Action Plan for Community Consultations and Sensitization for the period 2017 to 2018 (See section 5.7 Stakeholder Engagement below). However, the planned addition of 2 new staff members in 2019 will help to ensure continuing good performance in the context of future challenges as CBG moves into Phase 2 of the Expansion Project, particularly with respect to the Sangarédi area of the concession.

5.3 HSE Performance

5.3.1 Expansion Project

CBG has a number of KPIs based on H&S metrics for the Expansion Project, including *inter alia*:

- Medical treatment cases (5 in the year through to 31st October 2018)
- Lost Time Injuries (zero in the year through to 31st October 2018)
- Total Recordable Incident Rate (0.47 in the year through to 31st October 2018)

CANARAIL

The IESC's walk over inspection of the Kamsar site included a visit to the CANARAIL workshop area, where CBG's fleet of wagons is undergoing refurbishment in order to be compatible with the new tippler. The IESC noted several examples of good practice including:

- Good use of welding screens (Appendix 4, Photo 24);
- Use of simple barrier tape around trip hazard (Appendix 4, Photo 25);
- Use harness and lanyard when working at height (even at relatively low heights);
- Secondary brake and de-rail device in case of runaway wagon;
- Visible on-site H&S presence/supervision;
- Upgrade of lighting in working areas; and
- Overall good housekeeping

The good HSE practices exhibited in the CANARAIL work areas provide an opportunity for the knowledge transfer of good practices. For example, the proactive transfer of CBG welders/HSE supervisors into the CANARAIL facility would encourage the adoption of welding screens in other CBG areas and improve the general awareness of good H&S practice/continuous improvement.

5.3.2 Operations

The same metrics are recorded for operations as follows

- Medical treatment cases (8 in the year through to 31st October 2018)
- Lost Time Injuries (3 in the year through to 31st October 2018)
- Total Recordable Incident Rate (0.14 in October 2018 using a 12-month rolling average)
- Zero fatalities

Whereas a higher number of LTIs are recorded for the Operations, the IESC highlights the lower Total Recordable Incident Rate for Operations which results from the much higher number of man hours worked by the Operations workforce (13 million for Operations versus 3.4 million man hours for the Expansion Project).

Further discussion concerning H&S observations made during the site visit is provided in Sections 5.3.3 - 5.3.5.

5.3.3 Site observations

The IESC travelled to Sangaredi to view active mining operations and associated activities, including construction of the Thiapikoure haul road. Two significant Health and safety observations were made during the trip as described below:

1. On approaching an active mining area, the convoy of vehicles being used to transport the IESC group, did not have warning flags (Appendix 4, Photo 32) resulting in the risk that the convoy vehicles would not be visible to drivers operating large haul trucks. The convoy was halted by the Lender group and close observation of the mining activity was not possible. The safety breach was reported immediately to senior management and

actions were immediately taken to reinforce the mandatory use of safety flags for all small road vehicles present in active mining areas. Nevertheless, the breach is considered to be serious and reinforces the need for continuous reinforcement of mandatory safety protocols for the mining sector. The IESC recommends regular refresher training and an internal audit of mine vehicles to ensure whip and flags are available on all vehicles entering active mining areas.

2. During travel along the Thiapikoure haul road, the IESC stopped to observe health and safety practices at a bridge construction across a watercourse (Appendix 4, photo 33). The construction activity underway had been contracted to a local construction firm. A number of poor practices were observed, including:
 - No H&S supervisor/oversight on site;
 - Numerous workers in close proximity to a fall hazard with inappropriate barrier (a low-level tape is considered inadequate);
 - Use of 'home made' wooden ladder to access elevated areas. The ladder appeared to have been extended, but remained too short; and
 - No evidence of the use of safety harnesses whilst working at height.

Whereas CBG has appropriate safety procedures in place, it is clear they were not being applied at this site. Further efforts are required to ensure not only is paperwork completed, but safety measures specified via the Job Safety Analysis procedure/issuance of a Permit to Work, are reflected by actual practices on site. The work practices observed at the bridge location were not typical of practices observed elsewhere within the main construction areas. It is therefore recommended that further effort and H&S presence is afforded to remote locations/relatively small construction sites to ensure good practices are employed consistently across all CBG activities.

5.3.4 Diving fatality

The HSE data above is for the period commencing 1st January 2018 through to the end of October 2018. Zero fatalities are reported, indicating that the death of a diver on the 29th October working in the CBG port is not included in the data. During the site visit, a formal investigation into the cause of the diver incident was underway and CBG was not in a position to provide findings of the investigation. A detailed incident report has since been produced in accordance with the Common Terms Agreement (CTA) requirements for a Class II non-conformance.

The report does not provide a definitive cause of the death, however it does conclude that the diver was not authorised or trained to undertake the task and recommends a number of actions to prevent further unauthorised tasks, including inter alia:

- an on-site control system (work permit, critical task analysis, tool box talk and equipment certificates);
- development of a dive works permit delivery process;
- port critical tasks safety review (external audit); and
- further training for employees.

The IESC recommends CBG undertakes a detailed review of its procedures and practices, and in this respect supports the corrective and preventative actions listed in the incident report. The IESC notes the action 'development of a dive works permit delivery process' and assumes this

refers to the development of a dive specific Permit to Work.¹⁰ Regardless of whether a specific dive PTW is developed, or the generic PTW is applied to diving operations, its rigorous application would have prevented the unauthorised and untrained diver attempting to complete the task.

The IESC recommends that CBG Health and safety procedures for diving and other activities becomes a focus for the next IESC site monitoring visit.

5.3.5 Train derailment

On the 17th December CBG reported a train derailment that had occurred on the preceding day. A total of 15 loaded wagons derailed resulting in damage to the wagons and rail but not injuries to CBG staff or community members. An investigation was reportedly underway to determine the cause of the incident – findings of the investigation are not available at the time of writing.

From the incident photographs the IESC notes a shadow cast by the sleepers, indicating the sleepers are not being fully supported by the ballast. Whereas the IESC is not suggesting this was the cause of the derailment, the apparent lack of ballast could destabilise the rail and passing trains in the future. Lenders should seek further advice on this issue from CBG and the Lenders' Technical Consultant.

Post-visit note: CBG has informed the IESC that there is an ongoing track inspection and maintenance programme to repair the line.

5.4 Environmental and Social Impact Assessment

The IESC has been made aware of additional ESIA documentation that is being prepared for CBG's future expansion. The IESC now understands that the Phase 2 Expansion ESIA will be subject to review by the an IESC as part of the Phase 2 Environmental and Social Due Diligence. On this basis, it does not relate to the Phase 1 Expansion Project and is considered to be out of scope of this report at this time.

5.5 Environmental and social management plans

The ESAP includes a requirement to 'Update the ESMP to include the existing CBG operations, the Phase 1 Expansion and any future expansions'. The timeframes for completion of this ESAP item have been extended via a series of discussions with Policy Lenders and waivers subsequently agreed with the Lender Group. At the time of writing, timeframes are still being formally revised, however it is likely the deadline will be the end of January 2019¹¹.

During the February 2018 site visit, the IESC reported that certain management plans provided for review lacked the level a specificity needed to be an 'operationalised' suite of management plans. In response, CBG has stated that it would develop a series of 'action plans', inclusive of firm commitments to undertake future actions with timeframes and responsible parties identified, to complement the management plans where necessary (see IESC's February 2018 monitoring report for more detail).

Throughout 2018 CBG has been updating its management plans to include existing operations, amending both the content of the management plans and supplementing with action plans where necessary. The IESC and Policy Lenders have worked closely with CBG providing feedback as necessary. At the time of the site visit a relatively small number of residual issues remained outstanding which were discussed during the site visit, and have been capture via a separate

¹⁰ CBGs operates a general Permit to Work (PTW) procedure and has a number of job specific PTWs, including hot works, confined spaces, working at heights and electrical works.

¹¹ The Air Quality Management Plan (AQMP) is an exception and has an extended deadline to allow for results of stack monitoring to be considered in a final AQMP

process/correspondence. Where relevant these residual items are discussed in other sections of the report including:

- the ESMS framework document;
- Mine Restoration and Closure Conceptual Plan;
- Air quality (Section 7.5);
- Emergency Response Plan (ERP) (Section 5.9);
- HR documentation (Section 6.2);
- Security Management Plan (Section 8.2); and
- Contractor Management Plan.

Of the outstanding issues the ERP and HR documentation present to greatest risk to closure of the ESAP item because the documentation is being significantly updated and thus the IESC and Policy lenders remain largely unsighted on these topics. These documents are scheduled to be provided to the IESC on 20th December and 15th January respectively. *Post audit note: the ERP was provided to the IESC in late December 2018 and the HR documentation mid-January 2019. Both are considered to adequate on issuance of this report.*

5.6 Plateau-by-plateau approach – in practice

In previous site visits the IESC has been made aware of CBG plans to manage mining activities on a plateau-by-plateau basis, defining plateau specific management plans drawing from other discipline-specific management plans. This is supported by various topic-specific plans that refer to the application of mitigation measures, identified in the topic-specific management plans, on plateau-by-plateau basis.

Whereas the IESC agrees the plateau-by -plateau concept is appropriate for the Project, it had not seen evidence of the approach in practice prior to the December site visit, in part because management plans were still in development e.g. the Water Management Plan. Consequently, a key objective of the site visit was to gain a better appreciation of CBG's implementation of the concept.

During the December 2018 visit, CBG provide an update on the Plateau-by-Plateau management of its mining operations. It is understood that CBG is current finalising a Plateau-by Plateau reference document that will give clear instruction to relevant parties including the process to follow (an activities checklist) and associated tools (constraints mapping, impact management table, risk assessment matrix, Land Disturbance Permit and roles and responsibilities).

Whereas the IESC has not had sight of this reference document CBG was nevertheless able to demonstrate how the approach is being applied to the mining future plateaus, using the Thiapikoure plateau (the next plateau to be mined) as an example. Of note CBG provided GIS maps of the plateau identifying locations of the various sensitivities, including villages, cultural heritage objects, steep slopes, water courses/sources etc. The maps then delineate buffer zones to highlight no go areas/areas requiring further study/verification and refinement of buffer zones.

The approach is supported by the CBG Senior management team and as such the Mining Department is fully aligned with the process being led by the HSEC department, for example, with the integration of E&S aspects during the development of the 5-year mining plan. This was confirmed during a meeting with the Mine Director.

The plateau-by-plateau approach is informed by survey work and it is understood that further survey work is required to confirm the presence of certain sensitive receptors on or in close proximity to the plateau. In the interim, mining of the Thiapikoure plateau is on hold until the

sensitivity mapping exercise is complete and a land disturbance permit issued by the HSEC Department. The IESC travelled the route of the new Thiapikoure haul road and is able to confirm the road has not been completed to prevent opening of the plateau for mining.

The IESC believes CBG is fully committed to and making good progress towards full implementation of the plateau-by-plateau approach.

5.7 Stakeholder engagement

The Action Plan for Community Consultations and Sensitization for the period 2017 to 2018 is near completion (includes a total of 202 communities covering the rail/port and mining areas). The Action Plan requires a set number of community/other meetings by topic and area. The Community Relations department has analysed its performance against the Action Plan: by topic and locality (mine and rail/port). Performance varies significantly across topic/locality in terms of actual number of meetings against target. In a summary of its performance it is stated that a series of operational challenges have been faced which have had an effect on its ability to implement the Action Plan, inter alia: logistical difficulties (transport) in travelling to/from meeting locations, coordination issues with other departments providing input to certain meetings the field and, also, time being spent on managing both community-level engagement and resettlement issues relating to the Multi-User Rail Project. The capacity of the Community Relations Department to manage all its commitments effectively will be a focus of the next IESC monitoring visit in Q2/Q3 2019.

In a summary of intentions related to community outreach in 2019, the CR department has highlighted the following:

- Updating stakeholder mapping;
- Reinforcing existing key 'messages' to communities and local government authorities with posters to be displayed at key locations; and
- Adding new topics for community sensitizations (such as the CBG-sponsored income generating activity programme in the context of forest area conservation actions) plus meetings focused on community concerns.
- Logistics difficulties in locating the team on the ground, the time spent on managing the files of the multi-user project and the availability of the teams of the departments concerned are considered as handicaps in the implementation of the Stakeholder Engagement Plan, especially in the transport / rail sectors.

5.8 Grievance mechanism

CBG continues to track grievances and concerns/suggestions (*doléances et préoccupations*) effectively. CBG also has the task of receiving and managing COBAD-road related grievances where CBG uses its best endeavours to encourage COBAD to resolve them.

In the IESC February monitoring report, it is noted that CBG provides figures showing a substantial decline in the annual number of grievances received, from 45 to 5, over the period 2015 to 2017 (Figure 5). For 2018 year-to-date (November 2018), there has been an increase to 10 grievances received; mostly relating to activities in the mining area. None of the grievances that are open are more than 2 months old and CBG confirmed to the IESC that progress was being made to resolve them and that there were no key issues involved. The IESC observes that 5 grievances for 2017 and 10 grievances for 2018 seems low given the scale of CBG operations and the community-level sensitization on the use of the Grievance Mechanism via the implementation of the Action Plan for Community Consultations and Sensitization for the period 2017 to 2018 (54 villages sensitized to date from a target of 91 villages – villages located in both mine and rail/port areas).

During a meeting with residents of Fassaly Foutabhé, considerable discussion occurred regarding a water pollution incident, possibly caused by presence of the nearby stockpile area/activities occurring at the stockpile area and/or the COBAD road. Both the villages of Fassaly Foutabhé and Fassaly Belenderé were reportedly affected and the residents of Fassaly Foutabhé considered that a grievance had been raised, but not resolved or closed-out yet.

During a discussion with the CR Manager and the staff member responsible for managing grievances, attention focused on the 4 open 'legacy' grievances which date from the period 2015-2017. These grievances are:

- Failure to rehabilitate a quarry in Kamsar (2015);
- Failure to rehabilitate quarries at Bintimodia (2016);
- Failure to rehabilitate damage to a water pump in Taïgbé (in Kamsar) (2016); and
- Disturbance (damage) to the head of the 'Miriré' spring, Sangarédi.

CBG was encouraged to decide soon whether there was a realistic possibility of closing any of them, and if not, to close them officially. This would require informing the complainant/s of the decision with reason/s provided and then recording the decisions (with reasons) to close them in the grievance register. The effectiveness of the Grievance Mechanism, in terms of community-level usage, will be a focus of the forthcoming IESC monitoring visit in Q2/Q3 2019. The status of the Fassaly Foutabhé/Fassaly Belenderé grievance will be checked along with progress in closing out all 'open' grievances including the long-standing legacy grievances. Also, Policy Lenders made a suggestion that the CR team should consider tagging COBAD-road related grievances within their grievance database to better track these grievances.

5.9 Emergency planning

The IESC has reported in previous site visit reports that CBG's Emergency Response Plan (ERP) was a high level 'framework' and incomplete. CBG accepted the IESC's earlier findings and decided to restructure and simplify the ERP following an internal review of the plan. As a consequence of the IESC's comments and internal consideration, CBG decided a wholesale revision of the plan was necessary and commissioned an external specialist to prepare the ERP.

The IESC met with the external specialist tasked with updating the ERP and was informed that the ERP would be provided for review on the 20th December 2018¹² and the simplified plan will not include annexes for the 22 potential emergency scenarios envisaged for inclusion in the original plan.

The ERP has been subject to a post-visit review by the IESC and is considered to be much improved with clear instructions and assignment of responsibilities in the event of emergencies.

5.10 Security Management Plan

Since September 2017, there has been a Security Advisor in place. That the IESC has met with on consecutive monitoring visits. Previously it was reported that the SMP could not be reviewed by the IESC except whilst on site due to the sensitive information contained within the plan, effectively making detailed review not possible because of the limited time available for this issue whilst on site. However, between the period February 2018 (previous reporting timeframe) and this current report, the SMP has been translated to English and made available for IESC review.

The IESC provided comments on the Security Management Plan (SMP) prior to the December 2018 monitoring visit and was informed during the visit that the IESC's comments had been

¹² The firm delivery deadline of the 31st December 2018 was agreed between Lender Group and CBG.

incorporated in a revised version. The revised plan was provided for IESC review after the site visit.

Post-visit note: the revised version of the SMP has been reviewed by the IESC and is considered to be satisfactory at the time this report is issued. Importantly, the SMP, together with the separate Community Health, Safety and Security Management Plan is aligned with applicable standards and guidelines, including PS4 and the Voluntary Principles on Security and Human Rights.

Table 5.1: Summary of Findings, PS1

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance
Dec 2018 _001	Audit programme	The current audit and inspection procedure is dated Jan 2014 and was scheduled for review in 2016. It is unclear whether the review took place.	All	The procedure should be reviewed and updated if necessary to ensure it reflects current practice.	Minor
Dec 2018 _002	HSE Performance	Two significant H&S observations were made during a visit to the mining operations around Sangaredi. <ol style="list-style-type: none"> 1. Use of vehicles in active mining areas without warning flags 2. Poor H&S practices at a bridge construction site. 	Construction and Operations	The IESC recommends <ol style="list-style-type: none"> 1. regular refresher training and an internal audit of mine vehicles to ensure whip and flags are available on all vehicles entering active mining areas. 2. further effort and H&S presence is afforded to remote locations/relatively small construction sites 	Moderate
Dec 2018 _003	HSE performance - Diving fatality	A detailed incident report following the death of a diver in CBG's port concluded that the diver was not authorised or trained to undertake the task and recommends a number of actions to prevent further unauthorised tasks. This represents a significant failure to follow safety procedures.	Construction and Operations	The IESC recommends CBG undertakes a detailed review of its procedures and practices for diving, and in this respect supports the corrective and preventative actions listed in the incident report. Job Safety Analysis and stringent application of the Permit to Work procedure is essential. Consideration should be given to a bespoke diving PTW.	Moderate
Dec 2018 _004	Security management	The HSEC briefing given to the IESC and Lenders did not include information about site evacuation in case of a major security issue.	All	CBG should strengthen its induction procedure(s) to ensure visitors are aware of	Moderate

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance
				the procedure to follow in case of a site evacuation.	
Dec 2018_005	Community grievances	There are 4 legacy grievances that remain open.	Construction	CBG should decide soon whether there is a realistic possibility of closing any of the old open grievances, and if not, to close them officially. This action will require informing the complainant/s of the decision with reason/s provided and then recording the decisions (with reason) to close them in the grievance register.	Minor

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 management of temporary workers' accommodation. Due to constraints of time, the IESC was unable to visit an accommodation block.

The IESC met with the CBG HR Director on two occasions to discuss the approach to be taken by CBG to meet the ESAP requirement to update and amend the HR Policies and the Schedule 20 requirement to prepare a document 'Workers Rights/HR Management Procedure', (referred to as an 'HR Manual'). In addition, a meeting was held with the Fluor HR Manager to understand how Fluor manages labour and working conditions issues pertaining to Expansion Project contractors.

6.2 Employment and employees

The meetings with the CBG HR Director focused upon the key issues that CBG wished to resolve to enable it to prepare the required HR documents and the next steps leading to CBG preparing drafts of these documents for IESC/Policy Lender review. Understanding was reached on the scope and function of the HR documents and CBG agreed to:

- Provide copies to IESC/Lenders of all HR documents provided to all new employees;
- Check all existing CBG HR documentation to identify those documents that wholly or partially included PS2 requirements; and
- Submit drafts of the required documents, ensuring that the issues of a Workers' Grievance Mechanism and a retrenchment procedure were included (*Post monitoring visit note: the date for submission of these drafts was set as 15 January 2019*).

Whereas overall staff turnover within CBG is low¹³, during a presentation by the Expansion Construction Manager it was stated that staff turnover for certain roles is high, notably because many expatriates are on fixed term contracts (see Section 5.2). It was also stated that the Expansion Project Director will be focusing more attention on issues of staff retention in key roles. This issue will be investigated further during the next IESC monitoring visit anticipated in Q2/Q3, 2019.

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 February 2018 IESC monitoring site visit. This conclusion, coupled with time constraints, meant that this issue is not revisited in this report.

The existing Worker Accommodation Design Plan (Rev0 of 2016/11/03) sets out the criteria and standards to be used to construct and manage worker accommodation (most of which have been taken from the IFC/EBRD (2009) *Workers' Accommodation: Processes and Standards Guidance Note*, as determined by an earlier IESC review of this Plan. At the time of the December 2018 site visit, CBG had not issued a Rev1 version of the Plan for IESC/Lender review. Lack of a Rev1 version is not considered to be a material issue for the reason provided above. However, the Plan

¹³ Staff turnover for CBG is reported at 0.002%

will need updating, approval and re-issue prior to the construction of any new accommodation facilities for workers, for example, during future expansion phases.

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. In the meetings with the CBG HR Director, it was agreed that the drafts of all the required HR documents would include a PS2-compliant Workers' Grievance Mechanism.

CBG supplied a section of its log of 'Social Assistance' complaints. Of note, a number of the complaints were raised by the wives of workers particularly in relation to their husbands not passing on allowances or not providing for upkeep in situations where husband and wife have separated. Such complaints cast an interesting perspective on gender aspects of household financial management that CBG needs to consider in the context of compensation payments (mainly made to men) in relation to accidental damage to assets or in relation to foreseen and planned land take/occupancy. Mechanisms to promote equitable distribution of compensation payments to affected household members should be considered by CBG, for example, maximising the use of payments into joint bank accounts.

6.5 Occupational health and safety

6.5.1 Expansion Project

See Section 5.3, HSE Performance

6.6 Management of contractor labour and working conditions

A meeting with the Fluor HR Manager covered a range of topics as follows:

- Workforce;
- Audits of contractors;
- Workers' Grievance Mechanism;
- Demobilization of workers; and
- Workers' pay

A summary of key findings and issues for each topic is provided below.

6.6.1 Workforce

Currently, there are 15 contractors on site (including Fluor, which as EPCM acts for CBG as its Agent) of which 7 are Guinean. Nearly 75% of all employees (including Fluor) are Guinean and 49% of all employees originate from within Boke Prefecture. Approximately 10% are females and half of the female employees work for the contractor responsible for servicing the worker accommodation facilities.

6.6.2 Audits of contractors

Fluor regularly audits contractors with respect to a range of labour and working conditions issues. A standard audit checklist is used. It determines risks, compliance/non-compliances, corrective actions and target dates for closure. The checklist covers several PS2 requirements including, but not limited to: child/forced labour, non-discrimination in recruitment; issue of contracts for employment, application of a workers' grievance mechanism, and existence of an accommodation management plan. Of note; CBG does not formally audit Fluor in relation to labour and working conditions issues.

6.6.3 Workers' Grievance Mechanism

Not all contractors possessed a Workers' Grievance Mechanism when contracted. In such cases the contractors developed their own, but these were not checked against Fluor's Workers' Grievance Mechanism. However, Fluor's 'Industrial Relations Management Plan' (issued for use on 9 October 2017) states that Fluor's grievance procedure, "... is covered under Fluor's Corporate Procedure HR-101 Open Door Policy and the same practice is applicable to the contractors on the Project." Fluor maintain a grievance log and an electronic copy of a section of this log was provided to the IESC. The Fluor Industrial Relations Manager is responsible for managing grievances. Contractors are required to submit a report on all grievances raised, in a 'timely basis'. Grievances are managed at the contractor level and Fluor only becomes involved in 'big picture' grievances. Overall, Fluor informed that IESC that the frequency of grievances being raised does not seem to be high.

6.6.4 Demobilisation of workers

Fluor's 'Industrial Relations Management Plan' contains a section entitled 'Demobilisation Procedure', but its focus is on worker disciplinary matters leading to dismissal. As the Expansion Project Phase 1 is nearing completion, many local workers, employed by contractors are reaching the end to their contracted period of employment. The Fluor HR Manager confirmed that planning was undertaken to manage this issue. The number of workers demobilized in Q3/Q4 2018 was approximately 100/month and is expected to rise to approximately 300/month in Q1 2019 with demobilisation being completed by the end of March 2019. However, as Phase 2 of the Expansion Project is expected to begin in 2019 it is possible that numbers of the demobilised workers may be suitable candidates for re-hiring. A bridging programme to facilitate this process is under discussion, but as of end November 2018, key issues such as scope of the programme, staff resources and finance still had to be resolved.

6.6.5 Workers' payments

One key issue emerged from the discussion on demobilisation. Certain contractors, for example, COPISA had not been paying workers systematically and regularly. At the time of the meeting with the Fluor HR Manager, the discontent arising from such delayed payments had not resulted in any industrial relations incidents such as strikes.

Post-Visit Note: Fluor later confirmed via CBG that COPISA seemed, in the past, to have systemic problem in ensuring that correct information/documents were being passed, at the appropriate time, to brokers who had supplied workers to COPISA. Incidents of late payments had occurred with other contractors, but only irregularly. Fluor confirmed that it had worked with COPISA (and other contractors) to rectify situations of delayed payments and there were no incidents where a worker had not been paid within a short period of time, for example, payment had been made within 7 days in relation a delayed payment occurrence in November 2018. Currently, Fluor confirmed that there were no outstanding issues or complaints related to non-payment of salary cheques.

Given the apparent systemic problem with one significant contractor (Cospisa employs a significant percentage of the total Expansion Project workforce) and the imminent start of Phase 2 of the Expansion Project it is important that CBG reflects on lessons learnt from Phase 1 and, as necessary, refocuses its approach to manage contractors so that it can reduce the likelihood of such occurrences in the future. During the next monitoring visit in Q2/Q3 2019, the IESC will revisit CBG's supervisory approach for the management of contractors (and sub-contractors) and review a sample of audit reports, concerning payments to workers, that have been prepared by Fluor.

Table 6.1: Summary of Findings, PS2

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
Dec 2018 _006	Delayed salary payments to contracted workers	Some workers had not received their regular payments on-time.	Construction / PS2	Post-visit discussions have confirmed that the issue of late payment has been resolved there were no outstanding issues or complaints related to non-payment of salary cheques. Nevertheless, CBG to liaise with Fluor to determine lessons learnt regarding delayed payments and, as necessary, refocuses its approach to manage contractors and sub-contractors so that it can reduce the likelihood of such occurrences in the future.	Moderate

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;
- Air quality;
- Noise; and
- Environmental monitoring.

These are discussed in turn below along with a short section describing observations during a brief visit to the COBAD Road.

7.2 Water management

7.2.1 Kamsar Waste Water Treatment

The IESC visited the Kamsar Waste Water Treatment Plant (WWTP) and met with CBG staff responsible for the management of the facility. The plant was secure, had a manned control room and was shown to be functioning well following review of performance monitoring data. Photo 23 in Appendix 4 shows a filtration bed within the Kamsar WWTP.

7.2.2 Sangaredi Waste Water Treatment

Ramboll has reported CBG's awareness that the Sangarédi WWTP requires maintenance and upgrade since Ramboll's early involvement on the Project. In February 2018, the IESC commented that there was no firm commitment or timeframe for the upgrade of the treatment plant. The absence of a firm commitment has since been addressed through the preparation of an action plan appended to the Water Management Plan (see section 5.5, Environmental and Social Management Plans) which includes 22 specific upgrade/operational actions.

The Sangaredi WWTP was revisited during the December 2018 site visit. With the exception of vegetation clearance in the recirculating filtration beds there was little evidence of improvement. However, with the anticipated formal finalisation and sign-off of the Water Management Plan in the near future, accelerated progress is expected. The IESC will report progress against specific management/action plans in subsequent monitoring reports.

7.2.3 Haul road river crossing

The IESC visited construction of an ongoing river crossing on the new Thiapikoure haul road where the absence of erosion control measures, such as sediment basins, drains or berms to intercept and reduce the velocity of run off, was resulting in sedimentation of the stream (Appendix 4, Photo 34).

CBG should introduce temporary measures to minimise sedimentation and also initiate prompt revegetation/reinstatement of the exposed slopes as part of its reinstatement efforts.

7.3 Oil spill

In the February 2018 site visit monitoring report the IESC highlighted i) a significant oil spill in December 2017 allowing an estimated 600 litres of oil to leave the site and enter the Rio Nuñez estuary via a tidal drainage channel/creek caused following the diversion of oily water from the main (new) oil water separator; and ii) that the new (2 year old) oil/water separator had been malfunctioning and was under repair.

The IESC was unable to revisit the mangrove area affected by the oil spill, however based on photographic evidence and discussion with the CBG biodiversity lead, there is no significant impact on the mangroves.

7.3.1 Oil/water separator

The IESC also reviewed monitoring data for the discharge downstream of the repaired oil/water separator located adjacent to the tank farm. Visual observation of the effluent indicated an improvement (photo 20) which is supported by empirical data, however oil concentrations continue to exceed Project standards.

Monitoring of oil content in effluent is ongoing and CBG is considering future measures to further reduce oil content in this effluent stream. Of note, BGEER has also identified the need to address this issue and recommended in its audit/inspection the decommissioning and replacement of the oil water separator with a higher capacity/more efficient separator.

The IESC agrees replacement of the oil/water separator might ultimately be necessary if further optimisation of plant performance and reduction of oil at source does not result in complaint discharge concentrations.

7.3.2 Oil spill response equipment

In February 2018 the IESC reported that shipping containers used to house oil spill equipment appear to be unlabelled (non-inventorized) and located randomly in the port storage area. Vehicles were parked in front of one container preventing immediate access to the equipment.

In response to the IESC's finding, containers are now located together in a dedicated area where unhindered access to the containers can be assured – Appendix 4 photo 21 (Feb 2018) and Photo 22 (Dec 2018).

7.3.3 Oil spill at Filima

CBG reported¹⁴ a spill of 6437 litres inside the Filima Power plant via the GFA (a Class I Non-Conformance). The incident occurred in September 2018 and resulted from the collapse of the frame used to elevate a diesel fuel tank. No injuries occurred, although the potential for injury was apparent.

The incident report outlines a number of preventative actions, that will be applied to all similar CBG sites and operational areas, to prevent a reoccurrence including: installation of emergency response kit; construction of secondary containment; and a maintenance regime amongst others. The IESC concurs with the proposed preventative actions and would further add there should be a review of the fuel storage design. For example, the need to elevate the fuel, and where elevation is necessary, the design and stability of the metallic rack used (the frame appears to have been unsecured).

¹⁴ Report dated 19 October 2018 entitled Report on the Class I non Conformance – Spill of 6347 litres inside the Filima power plant.

7.3.4 Use of Finasol

The IESC recommended against the use of Finasol as a degreaser because it was likely to reduce the effectiveness of the site's oil water separator. CBG informed that the practice has ceased.

7.4 Waste management

7.4.1 Kamsar (Tora Bora)

In the February 2018 Ramboll visited CBG's Tora Bora waste management facility, CBG's long term solution for its waste management, and reported that no engineering works were ongoing at the time (Appendix 4, photo 7). In December 2018 it was noted that early construction at the Tora Bora site was underway with site clearance and levelling for a future soil bioremediation zone and siting of incinerators (Appendix 4, photo 8). Construction of the Tora Bora facility will take approximately a year according to the schedule presented in the Waste Management Plan.

The Tora Bora facility will be the primary waste facility for CBG's activities receiving hazardous and non-hazardous wastes. CBG stopped using the nearby Bendougou facility in late 2017 and has therefore been stockpiling wastes in temporary storage areas since this time, and will continue to do so until Tora Bora is able to receive wastes. As a consequence, significant volumes of waste have accumulated as discussed in Section 7.4.2.

7.4.2 Temporary waste storage areas

Expansion Project waste storage area

The IESC revisited the temporary waste storage areas where non-hazardous and 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 secondary sizer site. The status of this facility was reported in the IESC's February 2018 site visit report and a number of observations requiring corrective actions identified including the need to improve ventilation in a waste solvent container and prevention of tyre burning. These issues have been addressed by CBG – see Appendix 3.1, Issue Feb 2018_013.

Whereas the earlier issues have been addressed, the IESC notes that the volumes of waste being stockpiled have increased significantly. This is to be expected given Tora Bora is not operational and disposal of wastes at the Bendougou site have ceased, but nevertheless a number of further observations are made:

- Unlabelled 200 litre drums, including partially filled drums, have been stored for over 9 months without secondary containment (Appendix 4, Photo 11);
- Hydrocarbon staining is apparent in some areas (Appendix 4, Photo 12);
- Waste oil is stored in open drums, likely resulting in VOC emissions (Appendix 4, photo 13)
- The large volumes of waste have resulted in trip hazards within the waste perimeter fence (Appendix 4, photo 14) and also storage of non-hazardous wastes outside of the waste facility (Appendix 4, Photo 15).

The IESC also noted the bank of shipping containers were all open/unlocked and signage/container labelling viewed in the February site visit were no longer in place.

The IESC accepts that many of these problems can be resolved once Tora Bora is ready to start receiving wastes, further emphasising the urgency surrounding construction of the Tora Bora facility. In the interim, CBG should improve practices at this and other temporary storage areas

(labelling and house-keeping) and expedite removal of wastes to be recycled by external service providers e.g. the large volumes of scrap metal observed.

Other temporary waste storage areas

An area described as a temporary waste stockpile was observed close to the tank farm in Kamsar. The nature of the waste in this area was unclear to the IESC¹⁵ and difficult to view due to the level of vegetation growth. Given the level of vegetative cover (Appendix 4, Photo 16), the IESC would question the 'temporary' nature of this stockpile and recommends plans are put in place to arrange for its disposal in accordance with the waste hierarchy highlighted in the Waste Management Plan.

Several other temporary waste storage areas were also noted. In a number of instances, waste oil is being stockpiled for use as fuel in the dryers during the wet season (when the waste content of the bauxite necessitates more drying). The oil is typically stored in sealed metal containers without secondary containment; isolated evidence of hydrocarbon contamination was noted in these areas.

There is also an area of drums/bins adjacent to the decommissioned oil water separator that contain oil contaminated wastes following the oil spill in late 2017. The IESC understands this will be sent for bioremediation once the Tora bora facility is operational. The long-term (>12months) storage of these hazardous wastes without secondary containment is undesirable and increases the risks of soil contamination. Progress in constructing Tora Bora and reducing the waste stockpiles will be closely monitoring by the IESC during future monitoring trips.

7.4.3 Waste management -Sangaredi

The landfill facility at Sangaredi has been described in previous site visit reports. The IESC is aware of CBG's longer term plan to improve the existing facility as described in the Waste Management Plan and took the opportunity to revisit Sangaredi landfill during its December 2018 visit.

The facility is not yet schedule for any upgrade works and the only notable observation was the presence of security guards (Appendix 4, photo 31). The presence of the security guards is intended to discourage scavenging and was seen to be effective, however the security presence is for day time hours only. Whereas the IESC welcomes the presence of security guards, it was informed that people wait for the security guards to leave before scavenging, effectively during the hours of darkness. It is unclear whether the number of scavengers has decreased, but regardless, the new concern is there is an increased health risk to scavengers when visibility is poor.

CBG should confirm whether people are scavenging when the guards are not present and review the effectiveness of the day time security presence and the risk posed to community members in the light of its findings.

7.5 Air quality

7.5.1 Air Quality Management Plan

In the period between the February and December 2018 site visits CBG has updated its Air Quality Management Plan (AQMP) to provide greater specificity at the IESC request. A number of steps have been made to improve air quality including:

- the commissioning of new power generating units (Appendix 4, photo 26); and

¹⁵ CBG has informed the IESC that the characteristics of this waste is known.

- transition to low sulphur fuel across the majority of CBG's activities.

7.5.2 Dryer stack emissions

The dryer stack in Kamsar represents a significant emission source and it is anticipated further actions will be required to reduce emission of particulates and gaseous pollutants (noting SO₂ emissions are expected to reduce significantly following the introduction of low (1%) sulphur content fuel). Any further actions will be informed by the results of a future stack emission monitoring campaign. At the time of the visit, the AQMP (and the embedded action plan) committed to stack emission monitoring but did not include sufficient detail for the IESC to form an opinion. Consequently, CBG's plans for stack emission monitoring was discussed during the site visit and more details provided. In summary, CBG intends to undertake a monitoring programme that will determine emissions over a number of operating conditions and scenarios, including wet and dry season for the existing 3 dryers, and further sampling to determine emissions from the new dryer once on line.

Post audit note: subsequent discussions have taken place in which CBG agreed to prepare a formal monitoring programme/schedule for the 2019 stack emission monitoring programme. The schedule has since been received prior to issuance of this report.

7.5.3 Air Quality Monitoring Programme

Ramboll revisited a permanent air quality monitoring station and was shown CBG's environmental laboratory cognizant that the monitoring team has faced several challenges including equipment failures when previously visited. On this occasion the IESC is able to report that the air quality monitoring station had been fixed and was functioning well.

7.6 Noise

One of the key noise mitigation measures adopted by CBG is the use of surface miners in proximity to sensitive receptors. In previous site visits the IESC has been informed of CBG's intention to procure additional surface miners. However, CBG was in possession of only one surface miner at the time of the visit which had 'broken down' and therefore unavailable for use. The surface miner has been broken down during previous IESC site visits suggesting breakdowns are a not unusual. Given the importance of surface miners as a noise mitigation measure, the possession of a single unit represents a risk to CBG's mining operations.

CBG should expedite the intended procurement of additional surface miners to ensure break downs and unavailability of surface miner(s) does not hamper its ability to implement noise mitigation measures.

7.7 Environmental monitoring

The IESC received CBG's Environmental Monitoring Plan (EMoP) which was available in English (mid 2018) and previously French language¹⁶. Following review via a separate process the IESC considers it to be comprehensive.

One of the objectives of the site visit was to confirm CBG's has resources in place to implement the EMoP and in particular confirm monitoring is underway/equipment is functioning and crucially, gain an understanding of how CBG is interpreting the monitoring data received. The table shown in Figure 3 below provides a summary of monitoring schedule.

The IESC was able to spend time with a representative from the CBG environmental monitoring team and the HSEC Director. Based on discussion held the IESC understands:

¹⁶ During the previous site visit the EMoP was available only in French language.

- A team of 6 CBG staff is dedicated to environmental monitoring;
- The CBG team is supported by 2 consultants from Englobe;
- Standard Operating Protocols (SOPs) are prepared for each element of the sampling campaign; and
- Samples are sent to Canada for analysis by MAXXAM, whilst CBG undertakes its own duplicate analyses (to get an early indication of monitoring results and any process upsets).

As described in Section 5.2, the Environment and Monitoring Team Leader left CBG shortly before the site visit. The Environment and Monitoring Team Leader had been instrumental in setting up the monitoring programme, including survey design, procurement of equipment and recruitment/training of monitoring personnel. Whereas the IESC views this as a significant loss, it is recognised that CBG is recruiting a replacement and also that the monitoring programmes are now established/equipment has been procured and the team trained in the operation of equipment (e.g. the fixed air quality monitoring station and laboratory). The IESC was also informed that the raw monitoring data produced by MAXXAM is interpreted by EEM (CBG's environmental consultant) and it is EEM's responsibility to analyse and present the data to CBG HSEC team. This includes highlighting any anomalies and non-conformances against the Project Standards. The HSEC team will then communicate the findings as necessary, informing Plant Manager(s) of an exceedance/change in plant performance and/or informing senior management where appropriate, for example, in the case of the oil water separator effluent discharge.

Figure 3. Summary of CBG's Environmental Monitoring Campaign

ENVIRONMENTAL MONITORING (Excludes samples collected and analyzed by the CBG laboratory)				
SOP TITLE	SAMPLE DETAILS	FREQUENCY	SAMPLES PER YEAR	SAMPLES BY SOP
1 - POTABLE WATER	Kamsar (10 points x Inst)	Monthly	120	240
	Sangaredi (10 points x Inst)	Monthly	120	
2 - SANITARY EFFLUENTS	Kamsar (1 point x Inst)	Monthly	12	24
	Sangaredi (1 point x Inst)	Monthly	12	
3 - INDUSTRIAL EFFLUENTS	Kamsar (4 points x Inst)	Monthly	48	60
	Sangaredi (1 point x Inst)	Monthly	12	
4 - MINING EFFLUENTS	Kamsar (0 points)	Monthly	0	36
	Sangaredi (3 point x Inst)	Monthly	36	
5 - SURFACE WATER	Kamsar (8 points x Inst)	Quarterly	32	196
	Sangaredi (13 points x Inst)	Monthly	156	
	Sangaredi PbP (2 points x Inst)	As required	8	
6 - SEDIMENTS	Kamsar (8 points x Inst)	Quarterly	32	92
	Sangaredi (13 points x Inst)	Quarterly	52	
	Sangaredi PbP (2 points x Inst)	As required	8	
7 - GROUNDWATER	Kamsar (5 points x Inst)	Monthly	60	204
	Sangaredi (34 points x Inst)	Quarterly	136	
	Sangaredi PbP (2 points x Inst)	As required	8	
8/9 - AIR QUALITY	Kamsar (AQMS)	Real-time	52	108
	Kamsar (5 points x Comp24)	Quarterly	20	
	Sangaredi (7 points x Comp24)	Quarterly	28	
	Sangaredi PbP (2 points x Comp24)	As required	8	
10 - NOISE AND VIBRATION	Kamsar (4 points x Comp24)	Quarterly	16	96
	Sangaredi (5 points x Comp24)	Quarterly	20	
	Sangaredi PbP (2 points x Comp24)	As required	8	
	Sangaredi Blasting (1 point x Inst)	Weekly	52	
11 - METEOROLOGY	Kamsar (MMS)	Real-time	52	104
	Sangaredi (MMS)	Real-time	52	
12 - WASTE MANAGEMENT	Kamsar	As required	---	---
	Sangaredi	As required	---	
13 - SPILL MANAGEMENT	Kamsar	As required	---	---
	Sangaredi	As required	---	
14 - GHG EMISSIONS	Kamsar	Monthly	12	24
	Sangaredi	Monthly	12	
			TOTAL	1184

AQMS = Air Quality Monitoring Station = Permanent installation

7.8 Mine Reclamation and Conceptual Closure Plan

CBG has produced a Mine Reclamation and Conceptual Closure Plan (MRCCP) which has been reviewed by the IESC. Following an iterative review process, a single material issue remained concerning the timeframes needed to reinstate historically disturbed areas – the 'catch up' period. During the site visit, the IESC was informed that a large number of seedlings grown in CBG's nursery are ready for planting and CBG's is confident the catch-up period can be reduced to 5 years if machinery is made available for reinstatement activities.

This catch-up period is consistent with Lenders expectations. *Post audit note: CBG has since formalised its intentions to provide necessary resources to reduce the catch up period to 5 years in a revised version of the MRCCP. See also Section 10.5, Rehabilitation Plan.*

7.9 COBAD Road

In its previous site visit report, the IESC highlighted the need to make some relatively minor changes to the COBAD Road ESIA to reflect actual practices ongoing at the time. CBG made these changes to the IESC's satisfaction.

During the December 2018 site visit the IESC made a brief visit to the COBAD Road including a drive along a section of the COBAD Road to the Parawi rail transfer station. The following observations are made:

- Relatively few COBAD lorries were found to be on the road. Nevertheless, dust volumes associated with moving truck was found to be significant (Appendix 4, photo 35) with limited evidence of dust suppression practices at the time of the visit. CBG environmental inspectors should monitor dust suppression activities closely and report to the HSEC team. Where the use of dust suppression is considered to be insufficient, CBG HSE Director should encourage COBAD to increase the frequency of dust suppression (watering) application.
- The IESC had previously been concerned about potential congestions and road accidents at the intersection of the COBAD Road and the main N3 road connecting Sangaredi to Kamsar. Site observations confirmed the presence of a manned crossing (Appendix 4, photo 36) and did not present any evidence of congestion/unacceptable risk of accidents. The finding is reassuring, although as noted above, the volume of CBG vehicles was low at the time of the visit.
- A meeting with a CBG inspector confirmed CBG has a monitoring and inspection presence in line with commitments made on the COBAD Road ESIA for bi-weekly inspections.

Table 7.1: Summary of Findings (PS3)

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
Dec 2018 _007	Water management – Thiapikoure haul road	Poor erosion control at the site of a bridge construction on the new Thiapikoure haul road is resulting in sedimentation of the stream.	Construction	CBG should introduce temporary measures to minimise sedimentation and also initiate prompt revegetation/reinstatement of the exposed slopes as part of its reinstatement and erosion control efforts.	Minor
Dec 2018 _008	Oil water separator discharge	Oil concentrations downstream of the oil water separator continue to breach Project Standards.	Operations	Ongoing efforts to meet discharge standards are required, including reducing release of oil at source. If oil in water standards cannot be met, replacement of the current oil water separator might be required.	Moderate
Dec 2018 _009	Oil spill at the Filima power plant	CBG reported a Spill of 6437 litres inside the Filima Power plant via the GFA (a Class I Non-Conformance).	Operations	CBG to implement the actions identified in the incident investigation report. Furthermore, CBG should review the design of the fuel storage area, and in particular the need to elevate large volumes of fuel at height.	Minor
Dec 2018 _010	Waste management – temporary storage areas adjacent to secondary crusher and elsewhere	<p>The volumes of stockpiled wastes have increased significantly. A number of housekeeping issues are observed:</p> <ul style="list-style-type: none"> • Unlabelled drums; • Hydrocarbon staining; • Trips hazards; • Likely VOC emissions from open drums; and • Poor signage on shipping containers intended for temporary storage of hazardous wastes. <p>Elsewhere, spent oil for use as fuel for the dryers is stored in in sealed metal</p>	Construction	<p>CBG should improve practices at this and other temporary storage areas, for example, labelling of hazardous storage areas and general house-keeping to reduce safety hazards) and expedite removal of wastes to be recycle by external service providers e.g. the large volumes of scrap metal witnessed.</p> <p>The large volumes of used oil being stockpiled in the dry season, prior to use as fuel for the burners in the wet season, should be stored in dedicated areas with secondary containment.</p>	Minor

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
		containers but without secondary containment.			
Dec 2018 _011	Waste management – Sangaredi landfill	Anecdotal evidence was provided indicating that people scavenge from the site once security personnel are off duty.	Operations	CBG should confirm whether people are scavenging when the guards are not present and review the effectiveness of the security presence and the risk posed to community members in the light of its findings. In the event people are scavenging in hours of darkness, the effectiveness of the security presence, in terms of protecting human health, should be reviewed.	Minor
Dec 2018 _012	Air quality – Kamsar stack emissions	CBG's stack monitoring programme for 2019 needs to be clearly defined within a formal stack emissions monitoring programme.	Operations	CBG to prepare a formal monitoring programme for the 2019 stack emission monitoring programme for Policy lender and IESC approval.	Moderate (Closed at time of report issuance)
Dec 2018 _013	Noise mitigation – surface miners	The surface miner was broken at the time of the visit. The possession of a single surface miner represents a risk to CBG's ability to implement the key noise mitigation measure in proximity to sensitive receptors i.e. where use of surface miner is required in place of blasting.	Operations	CBG should expedite the intended procurement of additional surface miners to ensure breakdowns/maintenance of surface miner(s) does not limit ability to implement noise mitigation.	Minor
Dec 2018 _014	COBAD Road– implementation of mitigation measures	Dust volumes associated with moving trucks on the COBAD Road were found to be significant with limited evidence of dust suppression practices at the time of the visit.	Operations	CBG environmental inspectors should monitor dust suppression activities closely and report to the HSEC team. Where necessary, CBG HSE Director should liaise with the COBAD counterpart to increase the frequency of road wetting for dust suppression	Minor

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

Issues relating to PS4 have been addressed in previous reports and matters relating to PS4 were not a key focus of the site visit. Nevertheless, an update on key issues raised in the preceding IERSC site visit report is provided in this chapter.

8.1 Community Health and Safety Management Plan (CHSSMP)

The IESC previously reported that the CHSSMP was in draft and had material gaps rendering it unsatisfactory. Since the previous report, the identified gaps have been filled and a revised version of the CHSSMP prepared for IESC review. The latest version is considered satisfactory.

8.2 Railway safety

The IESC previously reported several positive initiatives undertaken by the Railway Department to improve physical safety barriers and raise rail safety awareness with local community members. CBG has also prepared a Rail Safety Management Plan inclusive of longer-term actions to improve rail (and road) safety for community members.

8.2.1 Fatality of a community member

In September 2018, a train hit a member of the community who subsequently died as a result of the injuries sustained. An incident report prepared by CBG has been submitted to the Lenders and the details of the incident are not duplicated here. This incident highlights the inherent risks associated with rail operations in close proximity to residential areas, particularly where communities resist any attempts made by CBG to erect safety fences along the railway line (as reported previously). It further emphasises the need for CBG to constantly reinforce awareness campaigns, as per the Rail and Road Safety Management Plan. Implementation of this plan will be the subject of detailed review during the next IESC site visit.

8.2.2 Telibofi village

During a visit to Telibofi village to discuss the Kankalaré resettlement process and its implications for Telibofi; the village traditional authorities drew the IESC's attention to the proximity of the railway to the nearest houses of the village. To reach the RN3 villagers have to cross the railway as there is no safe crossing facility or bridge. As it passes the village the railway is located in a cutting with almost vertical sides in places (see Figure 4). Villagers leaders stated their animals sometimes fall into the cutting and are killed by trains and they are worried that there will be an increased risk of accidents involving children, especially since there is/will be an influx of children to the village from the Kankalaré hamlets. CBG has already initiated planning for a pedestrian bridge to replace the current informal crossing place. The leaders wish CBG to fence the railway, at least on the side nearest the village. It is suggested that CBG considers meeting this request for fencing along a length of the railway on the side nearest to the village and implement it at the same time as the bridge.

Figure 4: Telibofi: Railway cutting and informal crossing



8.3 Security

See section 5.10, Security Management Plan

9. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

9.1 Introduction

Six topics relating to PS5 are presented below:

- Kankalaré Haul Road and Parawi-Koobi Plateau Resettlement: Status Summary;
- Hamdallaye and Fassaly Foutabhé RAP: Outstanding Non-Budgeted Actions;
- Hamdallaye and Fassaly Foutabhé: Recent/Current Situation;
- Resettlement Implementation: Institutional Capacity;
- COBAD Road: Land Acquisition and Involuntary Resettlement; and
- Past Compensation Measures and Grievances Close-out;

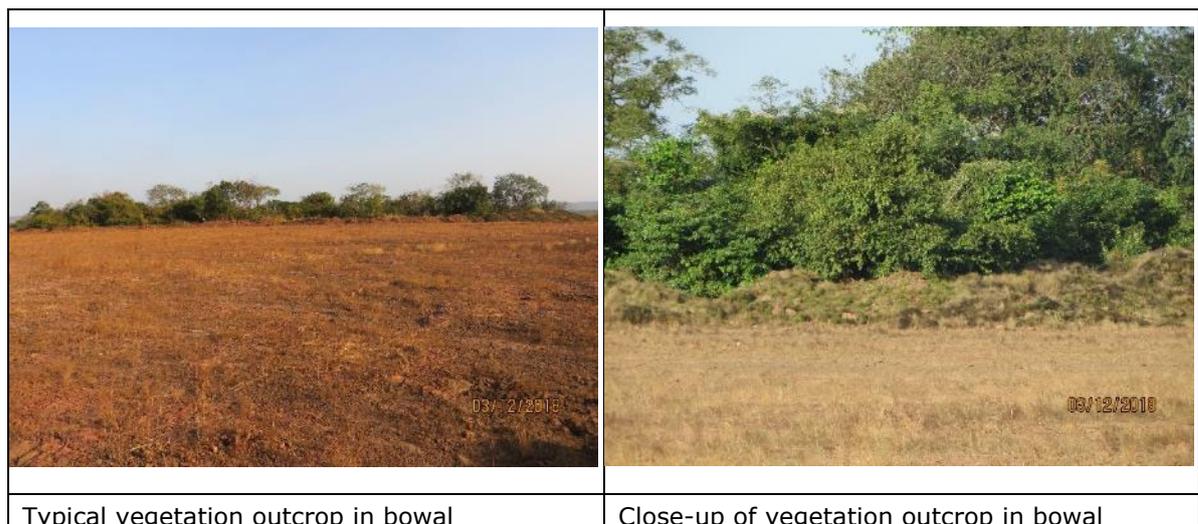
9.2 Kankalaré Haul Road and Parawi-Koobi Plateau Resettlement: Status Summary

9.2.1 Background

By early 2018, local people living near the Parawi-Koobi plateau were aware that the Parawi-Koobi plateau would be mined soon (planned for 2020). They were also aware that a 6 km haul road to service the mining activities in the plateau would be constructed in parallel and to the north of Route Nationale 3 and in the immediate vicinity of a series of very small settlements referred to by CBG as 'hamlets'.

The stripping of vegetation to enable 'washing' of the bauxite is a necessary precursor to mining and this stripping usually occurs 2 years before the start of mining. This stripping has occurred already for the Parawi-Koobi plateau, but it was limited to the bowal areas of the plateau. Outcrops of vegetation were not removed as these are often locations used by farmers for 'plantation-type' perennial crops such as cashews (see Figure 5).

Figure 5. Vegetation on the Parawi-Koobi plateau



This status summary focuses on two distinct, but related resettlement-related actions relating to the 'Kankalaré' haul road and mining of the Parawi-Koobi Plateau respectively - see sections below. These sections have been prepared based upon the results of the following actions, undertaken during the December 2018 monitoring visit:

- Meetings with the Resettlement Manager and resettlement personnel;
- Meeting with a selection of Kankalaré PAPs;
- Visit to Telibofi village (one of the preferred 'host' communities for the relocation of Kankalaré PAPs) to view a new housing area, the location of the proposed improved access road and bridge over the railway. Also, to meet with the Telibofi sector chief and elders/villagers;
- Visit to a Kankalaré hamlet (one of the few hamlets with people are still resident) and meeting with female PAPs; and
- Short visit to a section of the Parawi-Koobi plateau.

9.2.2 'Kankalaré' haul road

The construction of the haul road is necessary before mining can begin. Prior to early 2018, CBG began a series of consultations with local people residing in a series of small settlements (collectively referred to as 'Kankalaré'), located near the haul road route. Most, if not all if the inhabitants, were expected to be physically and/or economically displaced. Consultations and household survey results obtained were recorded in a document 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 conform to Guinean law, PS5 and CBG's existing procedures for land take and resettlement issues. IESC review of this report clearly indicated that it was not a PS5-compliant document (See IESC's February 2018 monitoring visit report). Previously, the IESC had understood that a RAP would be prepared as both physical and economic displacement would occur from the haul road construction. Following issue of the February 2018 IESC monitoring report, a waiver has been in place which required preparation of a PS5-compliant RAP. Consequently, CBG drafted a RAP which was reviewed by the IESC and Policy Lenders and was found not to be fully compliant with PS5.

Subsequently, and still under the terms of the ongoing waiver, CBG was tasked with ensuring that a Gap Analysis of the (then) version of the RAP (09 November 2018)¹⁷, against PS5 requirements, was undertaken. Subsequently, CBG was required to close all the identified gaps and then to prepare a final version of the RAP. This Gap Analysis was undertaken by a third party (a resettlement consultancy) under contract to the IESC. To summarize, the Gap Analysis report identifies several key gaps, provides guidance on how the gaps can be closed and gives pointers on how best to restructure the RAP. It is of note that the Gap Analysis report finds that CBG does not need to implement tasks such as additional field work, consultations and compensation calculations; instead it is suggested that a single experienced resettlement expert could be provided with all the key documentation (existing and new) and, on this basis, undertake additional analyses, add new results and reconfigure the existing and new material in order to produce a PS5-compliant RAP.

9.2.3 Parawi-Koobi Plateau

The current version of the Kankalaré RAP (09 November 2018) applies primarily to physical and economic displacement resulting from land take required for the haul road. However, in the RAP preparation process, haul road-affected PAPs demanded that all of their assets (not just those affected by the haul road), mostly cashew plantations located on the Parawi-Koobi plateau, should be compensated prior to giving their consent to relocate (CBG agreed to this demand). This decision led to individuals from other villages that have crops/assets on the plateau, also, to

¹⁷ Gap analysis work involved review of supporting materials such as a compensation calculation spreadsheets and Minutes of Meetings as well as the RAP itself.

claim compensation even though they had no assets affected by the haul road. Again, CBG agreed to this request.

These two incremental decisions have extended, effectively, asset compensation and expanded the scope of the Kankalaré RAP (originally focused on the haul road) to include individuals whose assets will be affected only by the commencement of mining activities in the plateau (scheduled for 2020). Analysis of the Kankalaré RAP shows that four categories of PAPs, all of whom have been compensated, can be identified:

- 1) Kankalaré PAPs residing in the footprint of the haul road and with assets in the footprint or with assets (mostly young cashew plantations) located on the Parawi-Koobi plateau (these assets are currently unaffected though access to them is now harder for some of the relocated PAPs);
- 2) PAPs with assets in the footprint of the haul road, but residing outside the footprint and not residing in a Kankalaré hamlet;
- 3) Non-PAPs who created structures after the established cut-off date of 13 March 2018; and
- 4) PAPs with assets (mostly cashew plantations) located on the Parawi-Koobi plateau, but who are not residing in the haul road footprint or have no assets in the footprint. Most of these PAPs reside in the 'Parawi' complex of settlements to the north of the plateau or in the village of Telibofi (located to the south-east of the plateau) and includes between 50 to 80 households.

To date, assets for PAPs in category 4, but also category (1) PAPs, from Kankalaré, who have assets on the plateau are unaffected by the stripping of vegetation on the Parawi-Koobi plateau. Also, compensation for assets on the plateau has occurred prior to formalized survey work. As of mid-December 2018; INSUCO, a consultancy, was expected to begin a survey of the plateau to map assets and link them to land users and/or land 'owners'. CBG considers that some of those compensated are land users who may not be land 'owners'. Also, CBG considers that some PAPs were compensated because of the proximity of their asset to the future Koobi mining areas, although mining is not now expected to result in land acquisition affecting these PAPs).

9.2.4 Current Issue

This extension of the scope of the Kankalaré RAP is understandable given the real-life context of resettlement actions related to the haul road. However, it has raised IESC and Policy Lender concern about the intended final configuration of the resettlement documentation that will eventually provide the management framework and actions for relocation and/or livelihood restoration as a result of physical and economic displacement caused by the haul road and the foreseen mining activities on the Parawi-Koobi plateau respectively. The following statements, taken from the Kankalaré RAP, indicate the basis for this concern:

- The Kankalaré RAP indicates that compensation paid to the category (3) PAPs, "... should not form part of this resettlement and are registered in a separate file" ;
- The Kankalaré RAP indicates that where there is, "...an overlap in some cases between the [haul] road and the Parawi-Koobi plateau" then this [Parawi-Koobi plateau] will be presented, "...in another document and according to different processes" IESC Note: CBG confirms that 'processes' refers to activities such as baseline surveys and valuations and not to compensation procedures which are common to all PAPs; and
- CBG intends to perform, "...an additional study for the rest of the Parawi-Koobi plateau, which will include compensated Kankalaré PAPs and any additional PAPs that

may be economically displaced.” (IESC Note: a plateau LRP or RAP which is expected to include category (1 and 4) PAPs and any others that are identified in the future).

Currently, the ‘on-the-ground’ reality (for example, initial work undertaken by CBG and the survey work to be implemented by INSUCO) is ahead of the appropriate plans being in place. It is important that targeted, effective effort is now expended to enable the plan preparation process to not only ‘catch up’, but also be the key focus for current and future work to be done, in an integrated manner, to ensure that resettlement-related management is compliant with PS5.

9.2.5 CBG’s Intentions

CBG is obliged to fulfil the conditions of the waiver for the Kankalaré RAP. This requires submission of the Kankalaré RAP, following closure of all gaps, within four weeks of Policy Lender sign-off of the Gap Analysis report (expected toward the end of January 2019). CBG has decided that, realistically, it will not be feasible to add the Parawi-Koobi plateau resettlement to an expanded Kankalaré RAP. Thus, it has decided to prepare a separate resettlement plan: either a RAP or a Livelihood Restoration Plan (LRP) depending on the outcome of the survey work underway.

CBG has two important tasks to complete: i) finalization of the Kankalaré RAP; and then ii) the Parawi-Koobi plateau RAP or LRP. CBG has already secured the services of INSUCO to assist with survey work for the Parawi-Koobi plateau. It is the intention of the Resettlement Manager that an experienced resettlement consultancy will be responsible for preparing the RAP or LRP. The IESC supports this view as it became clear, during consideration of the Kankalaré haul road and Parawi-Koobi plateau resettlement work to date, that in-house resources were and remain stretched¹⁸.

In addition, it is the IESC’s view, supported by one of the recommendations of the Gap Analysis report, that the finalization of the Kankalaré RAP will require the dedicated and focused attention of a resettlement specialist who is able to close the gaps and amend the current version of the RAP in line with Gap Analysis report recommendations on the RAP’s structure/content (both technical and presentational). See section 9.6 Resettlement Implementation: Institutional Capacity below.

9.2.6 Kankalaré Resettlement: Relocation of PAPs

Many PAPs originated in villages located near the Parawi-Koobi plateau or from further afield and most of these PAPs had returned or were returning to their natal villages to resume their residence, although based on a meeting with a group of women the IESC was informed that some people were remaining until the end of the crop harvest before moving.

There are two nearby villages that seem to be accepting the bulk of such PAPs: Telibofi and Parawi. Based on an interview with several PAPs (all males) and a visit to Telibofi (and discussion with the Sector Chief and some elders) it seems that Telibofi is a favoured village¹⁹ for both returnees and relocation. It is possible that returning/relocating PAPs may result in the number of people residing in the ‘core’ Telibofi village increasing significantly. In recognition of the fact that many Kankalaré residents will be returning to Telibofi and Parawi, CBG has planned several infrastructure measures to assist the current residents and the returnees (boreholes, access roads and, for Telibofi, also a bridge over the nearby railway track that divides the village from the RN3).

¹⁸ During a lengthy discussion, the Resettlement Manager showed the IESC and Policy Lender social specialists a range of detailed spreadsheets dealing with compensation calculations which he had prepared. This type of work is not a cost-effective use of the Resettlement Manager’s time.

¹⁹ In the meeting with women in Kankalare, there was unanimity among the women that they did not favour Telibofi and wished to relocate to an alternative location, but their husbands had decided that all would relocate to Telibofi.

In July 2017, the IESC presented a finding (of 'Moderate' significance) relating to the provision of school places for Kankalaré and Telibofi children due to the relation of the Hamdallaye village to its new site. During the discussion with women from one of the Kankalaré hamlets, it was stated that there was a non-government 'school', located in one of the hamlets, which was attended by children from Kankalaré and nearby villages such as Telibofi (a figure of 45 pupils was given). This 'school' is no longer operating. The July 2017 finding remains 'Open' (see row item July 2017_029 in Appendix 3.2) and the issue of school provision and these communities will be a focus of the next IESC monitoring visit in Q2/Q3 2019.

The finalized Kankalaré RAP will contain a livelihood restoration programme (in line with the Gap Analysis Report findings) applicable to displaced households. Within this context, it is likely that, in Telibofi (and perhaps to a lesser extent, Parawi), a considerable proportion of the households will benefit from livelihood restoration measures. Both villages are acting as *de facto* host communities and it may be expected that the non-Kankalaré-PAP residents may consider that livelihood restoration measures should apply equally to them given that many of the PAP recipients will be either a) community members, who lived outside the villages permanently or temporarily over the past few years, but who have now returned or b) non-natal individuals /households who have chosen to relocate to Telibofi and Parawi. To avoid any potential for intra-community disharmony, or even conflict, it is recommended that CBG consider Telibofi and Parawi as 'Affected communities' and therefore requiring application of mitigation measures to all households to avoid disruption of social/cultural continuity. In this case the mitigation measures would take the form of livelihood restoration/enhancement initiatives.

Post-visit Note: CBG has conducted a risk analysis and mitigation measures have been proposed. It is recommended that, if not already done, the risk of intra-community disharmony, is considered within the context of revising the risk analysis and specific measures are formulated and then applied to manage any additional risks, as necessary.

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

In the February 2018 IESC monitoring report, the IESC recounted progress with respect to these non-budgeted actions. It was reported that the CBG document '*Hamdallaye & Fassaly Foutabhe Resettlement Action Plan Supplementary Information Report*' (dated 25 January 2018) contained evidence that effectively 'closed out' most of these actions and indicated significant progress toward 'closing' the others.

Key actions showing noteworthy progress toward 'closing out' were identified and an update is provided below. The actions 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. This validation has not yet occurred; 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, by CBG, that the average yield of water, that fell within World Health Organization standards for potable water, provided enough supply for a population three times the size of the current Hamdallaye village. Four more boreholes were drilled in April 2018, at the end of the dry season. In CBG's view the data from all boreholes confirm the initial findings from the two original boreholes. Of note: following the December 2018 monitoring visit, and at the IESC's

request, CBG provided data to support this conclusion on adequacy of supply. The data were examined by the IESC's water specialist who considers that the data provided are insufficient to enable an opinion to be formed on whether the wells are able to supply sufficient quantity of water in terms of providing the needed current and projected supply for both domestic consumption/use and for market gardening (one of the proposed livelihood restoration activities). This issue will be explored further in correspondence between the IESC and CBG and, as necessary, during the next monitoring visit in Q2/Q3 2019.

9.4 Hamdallaye and Fassaly Foutabhé: Recent/Current Situation

9.4.1 Introduction

A synopsis of recent and current work is provided below for each village respectively, excepting livelihood restoration which is occurring across both villages.

9.4.2 Hamdallaye

Two aspects are presented separately below: i) change in compensation strategy for selected PAPs and ii) village relocation.

Change in Compensation Strategy for Certain PAPs

In Q2 2018, CBG's decided to initiate land-for-land compensation (using rehabilitated mined land), instead of cash compensation, supported by a financed livelihood restoration programme, for loss of 55.1 ha of village agricultural land (51.7 ha of which was fallow land) to the Hamdallaye ore storage area. As this change was not in accordance with the disclosed RAP and CBG had not initiated the required Management of Change process, CBG sought a waiver which committed it to implement the set of corrective actions specified in the waiver. Essentially, CBG was required to justify the compensation strategy change to the Lenders (including the commissioning of a soil suitability survey, analysis of its results, and subsequent consultations with the PAPs prior to finalization of the strategy) before proceeding to implement the strategy change. Also, CBG was required to amend the Hamdallaye and Fassaly Foutabhé RAP Supplementary Information Report²⁰ to take account of the strategy change. In Q3 2018, the Lenders approved the proposed land-for-land strategy and this decision now allows CBG to progress with the soil suitability survey and consultations with the PAPs and, if CBG and the PAPs reach an agreement, to progress to implement the strategy. At the time of the site visit the soil suitability survey had not begun, though procurement of a contractor to implement the survey was underway. Therefore, no work had begun to amend the RAP Supplementary Information Report.

The aforementioned Lender approval was accompanied by a request that CBG includes two additional statements/information items into the RAP Supplementary Information Report when it is revised in line with the amended 'Proposed Strategy'. These two items are:

- Additional statement: "CBG will support any holder of land title to obtain formal land title". Also, CBG is requested to specify the form/substance of the support that will be offered; and
- Additional information: The amended 'Proposed Strategy' states that "under the existing Land Code (article 39, Title 1), requesting a legal transfer of land rights between the holder of a mining lease who does not have a land title and the owner of customary land rights would be impossible." A footnote that includes the referenced Article is missing and

²⁰ Dated 25 January 2018

should be provided, plus an explanation of how the Land Code prevents such a transfer of land rights.

Village Relocation

Since February 2018, considerable progress has been made with preparing the site for the relocation of the existing village. Of note, are the following actions /events:

- A revised Implementation Schedule (see Figure 7) is in place: relocation of all households by end June 2019 is planned. In Q2 and Q3 2018, the construction of houses and infrastructure fell behind schedule, but recently the construction rate has increased. To ensure an 'on-time' relocation there is a recovery plan for the existing contractors and a 'Plan B' (hiring additional contractor/s) to be implemented if problems occur that may result in a potential delay in initiating the relocation;
- Re-constituted Resettlement Committee: This Committee now has a wider/more varied community representation (representatives of each of the seven lineages of the village) and, also, local authority involvement. Of note, there is now no CBG membership of the Committee. CBG considers this Committee to be more effective than the previous one. The Committee has met on several occasions and the IESC/Policy Lender social specialists met with a selection of members during the site visit. Those members present at this meeting expressed overall satisfaction with the relocation progress. However, there have been and there continues to be some difficulties and challenges to be managed/resolved (see below);
- A decision by CBG to contract tree planting to the villagers: Following the disappointing results of the acacia *spp* planting programme; it proved to be impossible to initiate a tree planting programme in 2018 while construction of infrastructure and housing was being undertaken (one reason being the continuing process whereby housing areas for lineages and individual households were being selected throughout most of 2018). The intention is to start tree planting at the beginning of the wet season (June 2019);
- Resuming work on 'land-for-land' strategy and initiation of soil suitability survey; and
- Recent problems, such as acceptable room sizes have been resolved.

As can be seen from Figure 6, houses have a small shaded area. Currently, there is no provision for communal shaded structures that people can easily access to socialize informally. It is suggested that CBG consider providing such structures at different location within the site as part of its infrastructure provision.

Figure 6. Construction of houses at Hamdallaye

	
<p>Houses under construction</p>	<p>Kitchen facilities under construction (provided separately to houses)</p>

At the time of the visit, CBG is was considering the design and suitability of septic tanks to be installed. The IESC will revisit this once CBG has finalised the design.

Figure 7. Section of Hamdallaye and Fassaly Foutabhé RAP Implementation Schedule (December 2018 update)

PLANNING AS AT JULY 2018 December 18 Update														
	START	END	Aout 18	Sep. 18	Oct. 18	Nov. 18	Dec. 18	Jan. 19	Feb. 19	Mar. 19	Avr. 19	Mai 19	juin 19	Juil. 2019-2023
RAP IMPLEMENTATION PLANNING, CONTRACTS AND RESOURCES														
RAP Planning by Project Manager	1 June 2017	15 July 2017												
Englobe Contract & Resources (5 for Community Issues and 2 for Construction)	1 July 2017	20 November 2017												
Contract for Boreholes drilling	1 April 2017	20 November 2017												
Contract for Housing and Infrastructures Construction	27 July 2017	21 May 2018												
Contract for Livelihood Restoration (Project awarded to CECI)	27 July 2017	8 June 2018												
SUB-PROJECT - COMPENSATIONS			Aout 18	Sep. 18	Oct. 18	Nov. 18	Dec. 18	Jan. 19	Feb. 19	Mar. 19	Avr. 19	Mai 19	juin 19	Juil. 2019-2023
Crops inventories of critical areas - (Required for Parawi Construction Project)	10 July 2017	12 December 2017												
Update of Hamdallaye housing Inventories	10 July 2017	12 December 2017												
Preparation of final housing compensation choices and validation by families	7 January 2018	28 February 2018												
Plots measurements at Hamdallaye and Plot distribution/allocation at New Hamdallaye	20 August 2017	15 May 2018												
Communication to PAPs of the Land for Land Strategy	15 December 2018	30 December 2018												
Crops inventories of Future Mining Areas - (2020-2035)	2020	2025												
Fruit tree inventories at Hamdallaye Built Area	1 February 2019	31 March 2019												
Securisation of cemeteries (Hamdallaye & Fassaly Foutabeh)	15 December 2018	31 May 2019												
SUB-PROJECT LIVELIHOOD RESTORATION			Aout 18	Sep. 18	Oct. 18	Nov. 18	Dec. 18	Jan. 19	Feb. 19	Mar. 19	Avr. 19	Mai 19	juin 19	Juil. 2019-2023
Contractor selection (including potential local NGOs for implementation)	17 July 2017	9 January 2018												
Planning and Activities definition - Signature of Official Partnership	15 January 2018	15 June 2018												
Start-up Phase, Studies (Needs & Feasibilities), Key training and Execution Plans	20 June 2018	31 January 2019												
LR Project implementation (project training, financing, Coop,...)	1 February 2019	31 July 2021												
Follow-up and continuous support	1 August 2021	30 June 2023												
SUB-PROJECT - CONSTRUCTION			Aout 18	Sep. 18	Oct. 18	Nov. 18	Dec. 18	Jan. 19	Feb. 19	Mar. 19	Avr. 19	Mai 19	juin 19	Juil. 2019-2023
Bouléré Road (Construction by Parawi Project), Fassaly Foutabeh, Démourou	1 September 2017	30 June 2018												
Fassaly Foutabeh Road (ToRs, Contracts, Construction by sub-contractor)	1 May 2018	31 May 2019												
Démourou access from New Hamdallaye (Plan defined, 85% existing road)	1 July 2017	31 March 2019												
Resettlement site layout & preparation	1 April 2017	9 February 2018												
Water borehole drilling (HMD x 6 et FF x 1)	7 October 2017	30 August 2018												
Public building construction (Mobilisation, construction)	8 February 2018	31 March 2019												
Housing construction (Mobilisation, construction)	1 June 2018	31 May 2019												
Final preparation of site topography and roads	1 July 2018	31 May 2019												
Site tree planting	15 December 2018	31 May 2019												
MOVE TO NEW SITE			Aout 18	Sep. 18	Oct. 18	Nov. 18	Dec. 18	Jan. 19	Feb. 19	Mar. 19	Avr. 19	Mai 19	juin 19	Juil. 2019-2023
Preparation and execution	15 April 2019	15 June 2019												
Start date acted / Activity completed														

9.4.3 Fassaly Foutabhé

A meeting was held with community members (6 males and 4 females). The discussion was wide-ranging, from past/current grievances and how they had been managed to community members' vision for the village looking 5 years or more ahead. Here, only a summary of items relating to PS5 issues are mentioned.

A Resettlement Committee has been established in which only villagers are members. This is unlike the Hamdallaye Committee where local government authorities are members. The Fassaly Foutabhé Resettlement Committee meets infrequently and not on regular basis. Community members reported that CBG 'agents' visit the village, but not on regular basis (Of note: CBG later stated to the IESC that agents visited 2 or 3 times each week). Meetings seem to be unannounced and the 'agents' meet whoever is available in the village.

Community members confirmed that CECI (the implementing partner for the livelihood restoration programme) was known to them and that the CECI Project Manager had visited the village on several occasions. Also, it was confirmed that community members had chosen their favoured income generating activities; however not everyone has 'signed' for specific activities. It is possible for individuals to sign later, but there is a procedure to be followed.

Of note, toward the end of the discussion, some villagers expressed a longer-term concern about village viability given that they perceive that they are being 'surrounded' by mining activities and, also, Hamdallaye village was about to relocate to a new and more distant site. It is too early to know whether this perception will crystalize into a firm community-wide view that relocation may be the best option for Fassaly Foutabhé, but the idea is now probably present in the minds of its residents.

9.5 Livelihood Restoration

CECI is the implementing partner for the livelihood restoration programme across both villages. It is led by a Project Manager supported by a range of sub-contractors. The Project Manager is locally based and arrived in August 2018 although the programme started in June 2018. Early work focused on informing villagers about CECI's role, the livelihood restoration programme and gathering baseline data on village social organisation, particularly relating to livelihood activities and presence of vulnerable people/groups.

Key activities to date undertaken or in progress are:

- An operational action plan has been prepared, in draft, but it was not available during the monitoring visit;
- A range of income generating activities have been identified and feasibility studies underway (to be completed by end January 2019). Following completion of the feasibility studies, implementation will begin;
- Some locations for implementing these activities have been identified;
- Consultations on selection of income generating activities. Choice of activities offered to all adult inhabitants;
- Several groups in each village have been identified: 5 groups in Hamdallaye and 4 groups in Fassaly Foutabhé. These groups will participate in selected income generating activities. Most members of the groups, to date, are women and youths; and
- Financial training planned to begin in early December 2018.

At the time of the monitoring visit, vulnerable people had not been identified, but once identified the Project Manager confirmed that there will be appropriate measures devised for them. The

IESC will check on identification of vulnerable people during the forthcoming monitoring visit in 2019.

CBG has decided not to implement the previously considered Quick Impact Projects (see IESC monitoring report dated February 2018) because they were considered to be no longer required, although market gardening at the new Hamdallaye village site could be implemented quickly, if CBG discussions with CECI determine that there is a suitable and sustainable water supply for market gardening.

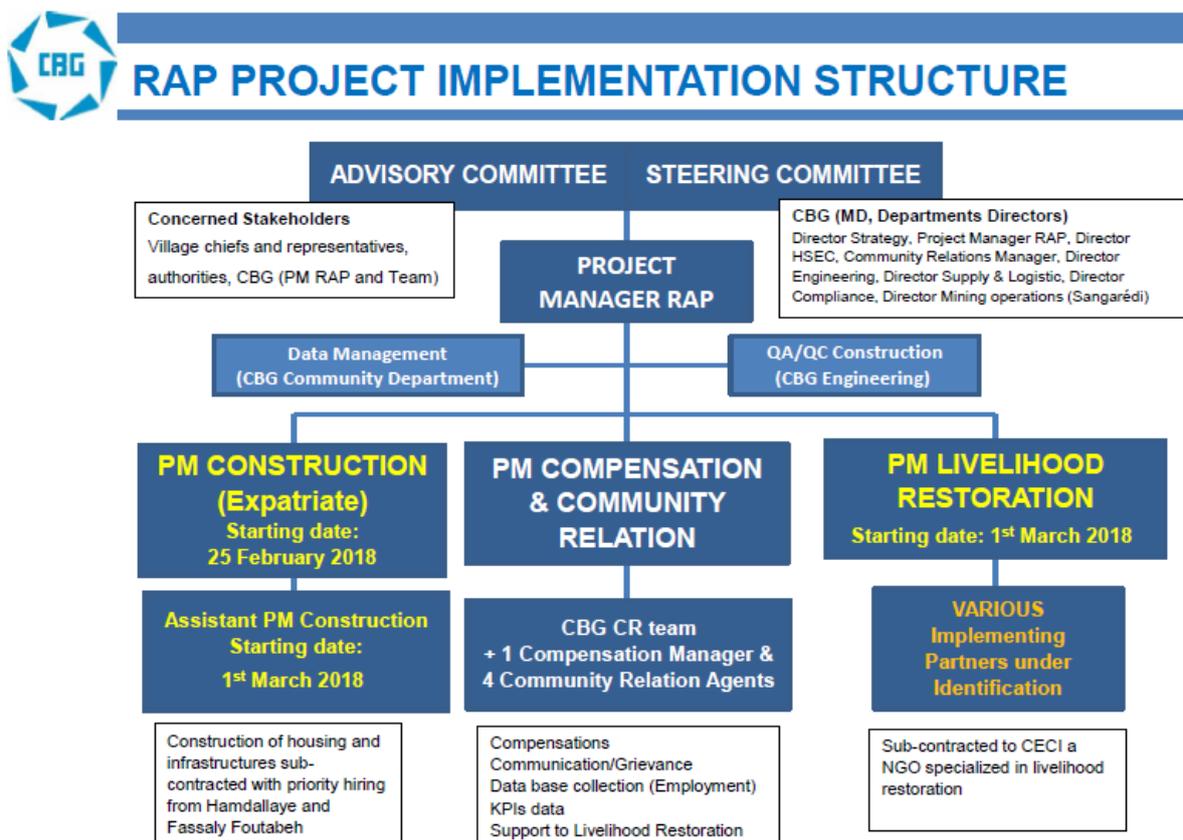
It is not foreseen that the Project Manager will require supporting project staff. The IESC is concerned that a single person may not be sufficient to deliver a complex programme over a 5-year period, by relying only on a series of defined inputs by a range of contractors. There is a risk that the Project Manager will spend a significant proportion of her time on managing contractors rather than on delivery of the programme. This concern may prove to be unfounded. However, the implementation of the programme, and the adequacy of CECI supervision, will be a key element of forthcoming IESC visits to the Project.

9.6 Resettlement Implementation: Institutional Capacity

The Resettlement Manager (referred to as the 'RAP Manager' in Figure 8 below) remains responsible for all land acquisition and involuntary resettlement issues (as defined by PS 5). In addition, to implementing the RAP for Hamdallaye and Fassaly Foutabhé, the Manager is also responsible for the preparation of the RAP for the Kankalaré hamlets (haul road) and a RAP or LRP for the Parawi-Koobi plateau mining (see section 9.2.3 above).

The core CBG personnel available to support the Resettlement Manager has not changed substantially since late 2017 (see organigramme for the RAP Implementation 'team'²¹ as shown in Figure 8). In addition to CBG personnel, the Manager is supported by a variety of consultants or implementing partners which are focused, almost exclusively, on Hamdallaye and Fassaly Foutabhé resettlement actions.

Figure 8: Current RAP implementation management structure



During the December 2018 monitoring visit, the IESC attended several 'in-depth' meetings and discussions with the Manager in the office and in the field. It became clear that he lacked technical support with respect to such activities as undertaking household surveys, asset inventories, and compensation calculations. In effect, the Manager was undertaking a considerable amount of this 'spreadsheet-type' work himself. Preparation of the haul-road focused Kankalaré RAP (not an activity scheduled for the Manager's attention) will divert his efforts from current activities and forthcoming preparatory work needed for resettlement planning for Parawi_Koobi plateau mining and, also, other communities/households as the current 5-yr mine plan advances.

Given the occurrence of these two important tasks, when combined with the Hamdallaye relocation work which is entering a key stage as relocation of villagers is foreseen to occur by end of Q2 2019, the IESC recommends that CBG provides all necessary support to the Resettlement Manager to enable the Manager and his colleagues to undertake all these tasks successfully. This support is likely to encompass resources to recruit consultants and a procurement process that recognizes the importance/urgency of the work to be done (see Section 9.6 below).

The IESC notes that 2 additional posts (classed as 'technicians') are being created to support resettlement work. At the time of the December 2018 monitoring visit, these posts did not have job specifications nor was it known when they would be filled. Given the increasing workload, as indicated above, it is important that the Resettlement Manager is provided with technical support as soon as possible (with the Manager being able to determine the type of support he needs). Also, with respect to the need to prepare the Kankalaré RAP, within 4 weeks of the CBG receiving the Lender-approved Kankalaré RAP Gap Analysis report, CBG needs to accelerate the procurement of an external consultant to prepare this RAP.

Of note, during the monitoring visit, the IESC and Policy Lenders were informed that the Project Steering Committee (made up of representatives from shareholders) had previously expressed, to CBG, its view on the benefits of using external consultancy support for specific resettlement related tasks.

9.7 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 because their homestead was situated in very close proximity to the COBAD Road. CBG was involved, jointly, with COBAD in the planning for their relocation, to be implemented in accordance with PS 5. 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. The IESC understands that CBG has prepared a 'Note to File' to confirm the end of its involvement and the reasons behind this decision. This 'Note' will be inspected during the forthcoming IESC monitoring visit on Q2/Q3 2019.

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. Following an IESC recommendation, CBG has been

periodically checking since April 2018, to determine if the site has been re-occupied²². The IESC was informed that, to date, there had been no sign of re-occupancy occurring.

9.8 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 three reports to the IESC/Lenders. The latest version was prepared following a meeting, in February 2018, between the IESC and CBG/EEM personnel. It is dated August 2018 and was submitted in October 2018. The first two versions were subject to Policy Lender/IESC comments (the third version has been commented upon by the IESC, but not all Policy Lenders) and no version has been accepted as yet providing, "*... a confirmation of no negative change in livelihood status for previous recipients of compensation payments.*"

Following a conference call discussion between the IESC and CBG/EEM personnel, prior to the December 2018 IESC monitoring site visit, it was agreed that further discussion would occur once all IESC/Policy Lender comments were received. This is expected to occur in early in Q1 2019.

This issue has been 'live' for almost 4 years, primarily due to the complexities of undertaking surveys of previous recipients of CBG cash compensation for land acquisition prior to the implementation of the Resettlement Policy Framework. With passing time, it is becoming increasingly difficult to implement the surveys, primarily, due to individuals/household moving location, resulting in increased difficulties in finding them, and to individuals dying. In the IESC's view, a date is approaching when it may be necessary to consider following one or more of these 3 options:

- 1) Amending the approach to data collection, undertaking more field work and issuing a fourth version of the report;
- 2) Determining if the existing data can be re-analysed and re-interpreted to provide clearer conclusions, and issuing a fourth version of the report; or
- 3) Identifying what can be learnt from the current report and closing the ESAP item.

The IESC suggests that option 3) is undertaken first and, depending upon the conclusion reached, option 2) would be initiated. Option 1) is, in the IESC's view, now probably not viable.

²² The IESC recommended that the periodic checking should occur for at least one year, from April, to determine if the 'abandonment' could be reasonably determined to be permanent.

Table 9.1: Summary of Compliance Findings, PS5

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
Dec 2018 _015	(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
Dec 2018 _016	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/validation 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 provide the manpower to manage the road/rail crossing effectively.	Moderate
Dec 2018 _017	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 commenced as planned (at beginning of the wet season), after careful examination of the species to be used and the timing, techniques and post-planting management needed to ensure the maximum survivable rate. In the interim, CBG to consider provision of a number of shaded communal structures as part of infrastructure provision for the new village site	Moderate
Dec 2018 _018	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

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
Dec 2018 _019	Construction of Parawi-Koobi haul road	A PS5 -compliant Resettlement Action Plan is required for the Kankalaré residents affected by the Parawi-Koobi haul road.	Construction/ PS5 and ESAP	Prepare PS5-compliant RAP within timescale stipulated in section 13 of the 09 November 2018 version of the Resettlement Action Plan. As the timescale is short, CBG to accelerate the procurement of an external consultant to prepare the PS5-compliant RAP Update Resettlement Policy Framework in near future.	High (increased to High because relocation almost completed and there is no PS5-compliant RAP in place)
Dec 2018 _020	Land acquisition	Implementation of strategy of land-for-land for certain Hamdallaye residents.	Construction and Operation/PS5	CBG to proceed to implement the strategy taking into account the results of the soil suitability survey and resulting consultations with the affected people. If soil proves not suitable (and cannot be rectified) and/or affected people reject the strategy, then alternative PS5-complaint compensation will be provided	High (Reducing to Moderate/ Low following implementation of the strategy)
Dec 2018 _021	Institutional capacity	The Resettlement Manager lacks permanent in-house technical support and ability to obtain external support promptly as /when needed	Construction and Operations / PS5	CBG to provide resources, as a priority, to release the Resettlement Manager from implementing a range of technical resettlement tasks thus freeing time to manage current activities and plan for future resettlement actions.	Moderate
Dec 2018 _022	Parawi-Koobi Plateau bauxite 'cleaning' and mining	A Resettlement Action Plan or Livelihood Restoration Plan is required	Operations / PS5	CBG to prepare a PS5-compliant Resettlement Action Plan or Livelihood Restoration Plan for displacement resulting from mining of this plateau – as determined by the INSUCO study	Moderate
Dec 2018 _023	Telibofi and Parawi villages and returning/relocating people/households	A livelihood restoration programme for displaced people from the Kankalaré hamlets (including those considered to be vulnerable) is required by the Gap Analysis Report. Other villagers (acting as 'hosts' for non-natal	Operations / PS5	CBG to revise its risk analysis (relating to these two villages) by adding the risk of intra-community disharmony resulting from application of livelihood restoration measures to certain, but not all households in the villages. Specific measures may need to be formulated and applied to manage any additional risks, as necessary.	Moderate

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
		individuals/household relocating to the village) will not be entitled to participate in this programme if they had no affected assets. This could cause intra-village social tensions.		CBG to consider risk of social tensions and if assessed as being likely to occur consider extending livelihood restoration measures to all villagers.	

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 February 2018 and July 2017.

The existing BMS Action tracking tool has been updated and a new spreadsheet has been produced with greater clarity of progress indicated through a traffic light system (red = late; orange/yellow = in progress; and green = done). Overall, 216 actions are required to be completed. An increase in the number of actions completed since February 2018 is partially due to progress with respect to the forest management programme and monitoring programmes for chimpanzees, reptiles and amphibians.

Table 10.1 Summary of BMS Action Tracking.

Status	November 2018	February 2018*	July 2017*
Completed	135 (62.5%)	37 (17.1%)	14 (6.5%)
In Progress	68 (31.5%)	152 (70.4%)	63 (29.2%)
Late	8 (3.7%)	9 (4%)	48 (22.2%)
Not Started	5 (2.3%)	16 (7.4%)	88 (40.7%)
Total Actions	216	214	213

*Total Actions for July 2017 and February 2018 should equal 216.

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. On 21st September 2018, a new Biodiversity Manager started on a new 2-year contract with a seamless transition occurring between the new and old contracts. The former manager stayed on until 30th October 2018. The new Biodiversity Manager is focused on Sangarédi working with Mining Planning and Mining Operations teams as the plateaux-by-plateaux extraction plan is scaled up. The role currently remains focused on biodiversity and no significant distractions from this work were identified.

10.2.2 Biodiversity Team

CBG has built a team of five biodiversity technicians covering flora and fauna surveys, BMS inspections, rehabilitation works, GIS and database management. In July 2017, the site visit report noted that the team is relatively inexperienced, although it has continued to show significant development since the November 2016 IESC monitoring site visit. 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 previous Biodiversity Manager developed a training plan for the team that included 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 new 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, however, as of November 2018, this has not occurred yet, possibly due to the transition of managers. New training packages have been delivered, for example a training package on snake handling and identification.

It was evident that in December 2018, the team has coalesced around the new Biodiversity Manager and that team spirit is buoyant. The biodiversity team have also assisted in bringing the new manager up to speed with developments to date.

Previously reported resource constraints including vehicle availability and lack of field equipment have been largely resolved. However, there remains an issue of availability to heavy plant equipment to complete certain tasks such as restoration of the old alignment of the COBAD Road and current rehabilitation programme.

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. 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 2018 that included meeting with communities, the setting-up of transect surveys, installation of 40 camera traps, identification of nests, and collection of faecal samples.

By the December 2018 visit, Sylvatrop had completed all bird and chimpanzee field surveys. Sylvatrop provided a presentation of the chimpanzee survey, though at the time of the December 2018 visit, analysis of the results had yet to be completed. A large amount of data has been collected, which has provided a greater insight into the chimpanzee community especially in respect to main inhabitations in areas of gallery forest. DNA analysis of faecal samples confirmed that the chimpanzee community originates from five mothers. A new genet record was also found for Guinea, *Genetta johnstoni* which connects populations previously discovered in Guinea Bissau and those in Sierra Leone and Liberia. In addition to the CBG chimpanzee survey, Sylvatrop were also able to complete a large-scale survey for chimpanzees on the GAC concession. Sylvatrop's results for both concession areas potentially indicate a number of separate groups that may interact with each other.

However, Sylvatrop are unable to share or show any results from the GAC dataset due to confidentiality. Given the importance of linking these two datasets, it is important that CBG considers contacting GAC and discuss opportunities to share data. The advantages are that it would give each party a wider dataset of chimpanzee whereabouts, group linkages and movements across each concession. In turn this aids the Biodiversity Team to identify current Critical Habitat with respect to chimpanzees and the Plateau-by-Plateau management.

The herpetology monitoring programme was due to start in March 2018 (a reconnaissance visit was made in January 2018). This programme included survey visits in April/May (dry season) and July/August (wet season). The programme also included training of the CBG Biodiversity Team in monitoring techniques and snake handling, as well as awareness raising in local communities and stakeholder engagement. Results were not available during the December 2018 visit and the Biodiversity Manager was waiting on the reports from Guinee Ecologie to be finalised.

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. Sylvatrop provided interim findings during the December 2018 visit and outlined key issues and achievements to date. In respect to key issues these surround the identification of Critical Habitat, e.g. those areas identified as supporting threatened species e.g. primates, fish and reptiles etc. typically gallery forest and community needs for land to grow crops, harvesting produce such as fruit and nuts, wood for burning and charcoal production. Good progress has been made by Sylvatrop and the outline of actions will be delivered shortly.

10.3.2 Participative monitoring programme

CBG has developed a participative monitoring programme for flora and vegetation. Ten individuals were identified which could undertake the role of 'para-botanist'. These were drawn from the surrounding communities and were trained up by Missouri Botanical Garden (MBG) for long-term participative monitoring of permanent vegetation plots. This programme was first started in November 2017. Unfortunately, due to social unrest, they were demobilized before the training could start. However, the programme commenced in April 2018 and has now reached completion. Of the ten initial recruits, eight have gone onto successfully complete the programme. The experience and skillset these individuals have gained is substantial and includes:

- Identifying and recognising habitats;
- Collecting plant specimens;
- Identifying plants and using their correct scientific names;
- How to use field equipment such as cameras and GPS;
- Indexing survey photographs and keeping field records;
- How to preserve and store specimens;
- How to package and send abroad; and
- Training on general office duties.

As a result, the para-botanists have gained a certificate in Botany from MBG. CBG is encouraging the group to organise themselves into an NGO or Toute Petite Enterprise (TPE) so that they can be contracted for various complementary work with the Biodiversity Team or other customers for survey

work. There are also opportunities to link up with the proposed community nursery scheme. During the December 2018 visit, the IESC was able to meet three of the team members and discuss with them their experiences and desires for the future. It was clearly evident that their dedication showed for continual involvement however they are lacking the capacity to deliver, thus further reinforcing the need to support them in the establishment of an enterprise of NGO.

10.3.3 Fish

As discussed in previous site visit reports, 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 is 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, noting that actions are anticipated to be delivered and implemented through the Community Forest Management Programme.

10.3.4 Marine mammals

CBG has developed a scope of works for a marine monitoring programme, including hump-backed dolphin, manatees and turtles which will be delivered through the Bauxite Environmental Network (BEN or REB in French)²³. 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. This meeting did occur and the Biodiversity Management Team are currently preparing Terms of Reference in order to initiate tendering for further monitoring work.

10.4 Creation of plateau-by-plateau management units

The BMS prescribes the development of a plateau-by-plateau (PbP) management tool ensuring early planning and monitoring and including input from the environment, social and engineering sides. A constraints mapping protocol has been developed that sets out specific buffer zones for each constraint and this has been fully 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.

During the December 2018, the IESC were informed that the plateau-by-plateau management system was now live and operational. The Biodiversity Management Team showed examples of a GIS Constraint Map indicating one of the main mining extraction zone, exclusion zones (gallery forest and Critical Habitat) and other features, for example the location of headwater springs. IESC recommends that the Biodiversity Team continues to develop the GIS database in order to make a comprehensive GIS Constraints map by further increasing the number of layers which are not currently under consideration. A working group (HSEC/Planning/Operations) is developing various documents to upgrade the Land Disturbance Permit process through the PbP approach in order to integrate the requirements specified within the suite of environmental and social management plans.

10.5 Rehabilitation Plan

CBG has developed a five-year strategic mine rehabilitation plan for the period 2018-2023 that covers 1291 hectares currently designated for mine extraction. The rehabilitation equates to an

²³ CBG and GAC under the auspices of the Chamber of Mines Guinea (CMG) together with six other mining companies formed in May 2018 an organisation called the Bauxite Environmental Network (BEN or REB in French). The purpose of the group is to better manage the cumulative impacts from mining on biodiversity through enlisting expert advice to develop an appropriate action plan.

average of approximately 250 hectares per annum. The plan sets out the methodologies to be employed to reprofile the exploited areas. The new rehabilitation strategies now include the following options:

- Ecological rehabilitation
 - spreading top-soil only. Easiest and cheapest procedure
- Assisted rehabilitation:
 - spreading top-soil and sowing of target native species
 - spreading top-soil and plantation of native species
 - Plantation of native species only
 - Plantation of native species alternated with fast growing species
 - Enrichment of natural but degraded forest sites with native species
- Agricultural rehabilitation
- Pasture development
- Forestry/agroforestry plantations
- Soil fixation and erosion control

The level of detail in the planting specification is satisfactory, 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 seven hectares of this area received ecological restoration, with 118 hectares of *Anacardium occidentale* (cashew nut) plantations. Of the 125 ha, 24 hectares received topsoil spreading. In November 2018, a revisit of two trial areas (one with top-soil and one without) highlighted that the area which received top-soil has responded much better than the Cashew plantation area which did not receive top-soil. The area with top soil now has a developing vegetation structure with pollinating grass and flowering plant communities.

At the time of the site visit heavy construction equipment such as a Caterpillar bulldozer was not available for rehabilitation works. In addition, it is not clear which department should be undertaking these works.

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 (Figure 9: Community Nursery in February 2018 and comparison in December 2018 and CBG now owns a stock of 100,000 plants. The nursery was visited during December 2018 and unfortunately the site had been allowed to deteriorate with many weeds found to be present. It is understood the nursery contract had ended and currently no community members are looking after the site. Only one site was checked therefore this may not be representative of all the sites. However, Ramboll questions whether this many plants should be held at any one time and if the nurseries are not maintained, it would be better to conduct a more rigorous planting campaign at the right time of year.

Figure 9: Community Nursery in February 2018 and comparison in December 2018

10.6 Routine environmental inspections

An HSEC inspection team has been developed, which was particularly active in monitoring the construction activities of the COBAD road. Since COBAD construction has ceased, this team has refocused to monitoring CBG operations. CBG has developed a proforma for use by the team during inspections.

10.7 Ecosystem services and stakeholder engagement

In the February 2018 site visit report, the IESC reported that during a visit to Kagnaka village, the local communities expressed concern about the conflict with chimpanzees over access to the spring that is the sole source of water for the village during the dry season. On this occasion, it was mooted 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, the IESC recommended immediate action be taken to find a solution. Finding a solution to this issue could be taken into account as part of the on-site offset.

In the IESC's February 2018 report it was recommended that a village pump, that had been vandalized, could be repaired/replaced to reduce the potential conflict. It is now understood that a new pump has recently been installed; the new system may significantly ease the human wildlife conflict, although the spring is still used by the women for washing. CBG should continue to monitor the situation throughout the dry season. If conflicts arise again, timings of use could be discussed with the villagers so as to avoid clashes.

The Kagnaka village was revisited during December 2018 and the issue had subsided, probably as it was the end of the wet season (water was plentiful) and beginning of a new dry season. Therefore, a temporary reprieve may exist and the issue could inflame with the onset of the dry season. Continuing to work with the Kagnaka community to ensure that their village well-pumps are fully operational might avoid another wildlife conflict.

Ramboll also observed that gallery forest beside the spring has been degraded as ever-increasing pressure for agriculture land continues and subsequent possible changes in environmental conditions e.g. increase in light and temperature further deteriorate the habitat (Figure 10. Gallery forest close to Kagnaka village where the nearest spring is located. Ensuring the protection of gallery forest and Critical Habitat for chimpanzees will require long-term effort working with the community to protect these zones.

Figure 10. Gallery forest close to Kagnaka village where the nearest spring is located



10.7.1 Biodiversity and Ecosystem Services Working Group

In line with the BMS, CBG has established 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.

No updates were available at the time of the November/December 2018 visit, however, the new Biodiversity Manager is working with the group and will initiate new meetings soon. Further collaborations have occurred with operators and stakeholders in 2018 including:

- Sylvatrop Consulting
- Guinee Ecologie
- EPA
- Boke Mine and Geology Institute
- Missouri Botanical Gardens
- Offset Partners (WCF and TBC)

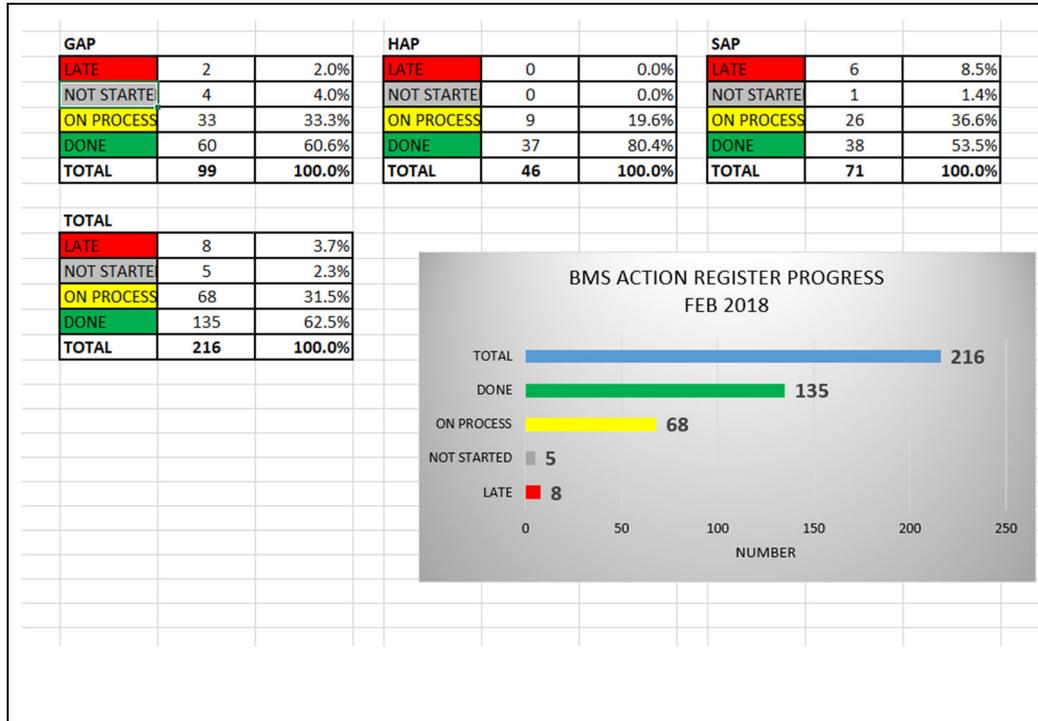
The group have also been assisting with establishing biodiversity in the curriculum of the Boke Mine and Geology Institute which joined the group as a full member in recent months.

10.8 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. As reported in Section 10.1, the BMS Action tracking tool has now been updated and Ramboll obtained a copy of this document during the December 2018

visit. Significant progress has been made during 2018 and it is anticipated through discussions with the Biodiversity Manager that focus will remain on the BMS into 2019 as project outcomes from those actions such as the Community Forest Programme commence.

Figure 11. Biodiversity Management System – Biodiversity Action Plan Register (November 2018)



10.9 COBAD Road

Rehabilitated vegetation along the COBAD Road had continued to develop when the site was visited in December 2018 becoming indistinguishable with surrounding habitats (Figure 12. Left and right, example of restored areas with planting now established. Rotational fire management for agricultural purposes and grazing as mentioned above may impact the restored areas and therefore ongoing inspections are likely to be needed for the foreseeable future.



Figure 12. Left and right, example of restored areas with planting now established

Since July 2017, two new bridges have been partially constructed on the old alignment of the COBAD road for community use (Figure13: Southern river crossing of old COBAD alignment (left February 2018 and right December 2018) 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 diverted to its original channel across the foundations of the bridge. The temporary river channel will also 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. In February 2018, the situation had not changed, however checks were made on the planted vegetation and grasses and trees were responding well though some grazing by goats had taken place which will require protection.



Figure13: Southern river crossing of old COBAD alignment (left February 2018 and right December 2018)

During the July 2017 site visit, significant erosion and sedimentation into rivers from the COBAD road were observed. This situation remained unchanged in February 2018, with exposed banks alongside road cuttings and unstable slopes adjacent to watercourses (Figure 14). By the time of the February 2018 site visit, CBG stated that there were plans to complete ecological restoration of these areas

CBG Bauxite Mine Expansion

once the river bank profiles have been restored (within the CBG concession only). The site was also visited in December 2018 and while some ecological restoration had taken place, large areas of river bank remain exposed. It is understood that contractors will return to complete the works over the dry season, but currently a large amount of riverbank remains exposed with no vegetation present. This area requires ecological restoration prior to the 2019 wet season.

Figure 14: Top-left - Slope Vulnerable to Erosion Adjacent to Critical Habitat Watercourse in February 2018; top-right and bottom-left parts of the slope have been rehabilitated (December 2018). However, as shown in bottom-right areas still remain exposed



10.10 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. As at November 2018, Guinée Ecologie had not yet reported on their surveys to date

but the reports are anticipated soon. However, many vultures were seen at the Sangarédi landfill confirming a waste food source is still available (Appendix 4, Photo 37).

10.11 Damage to Mangroves

During Ramboll's February 2018 site visit, an inspection was made of the mangrove area adjacent to Tora bora 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. Mangrove is a critical habitat and therefore Ramboll recommended that the excess soil is removed and mangrove vegetation was restored in the affected area. In December 2018, Ramboll can confirm the site had been restored and mangrove trees replanted (see Appendix 4, photo 9 and 10 showing the damaged area before and after restoration). The issue is now considered closed.

10.12 Guildhé Island (formerly referred to as '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 had been raised as a potential concern by one of the Policy Lenders. During the February visit, the CBG Biodiversity Team took GPS co-ordinates of the island and subsequently located the island within CBG's GIS database. The island location was confirmed as 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 Concession. Although impacts to the colobus from the CBG's operations South of the Cogon are unlikely, CBG's Biodiversity Team were due to raise the concern with COBAD and offer advice and assistance to support appropriate mitigation measures. However, as at November 2018, it is understood this hadn't happened. CBG chimpanzee monitoring programme will provide additional information on the distribution and abundance of this species.

Table 10.2: Summary of Findings, PS6

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
Dec 2018 _024	Human-wildlife conflict at Kagnaka village	During the last dry season a conflict arose between villagers and chimpanzees using the nearby spring.	PS6	Continue to monitor human wildlife conflict and consider discussing with villages optimum timings of use to avoid future conflicts.	Moderate
Dec 2018 _025	GIS Mapping	Development of a comprehensive and detailed GIS Ecological and Community Constraint Maps.	PS6	A GIS database has been initiated however a comprehensive and detailed GIS Ecological and Community Constraint Maps need to identify important biodiversity features, exclusion zones, Critical Habitat and rehabilitation areas. A separate map should show community ecosystem services, incentivised areas, problem areas.	Low
Dec 2018 _026	Aerial/satellite imagery	Ground conditions are constantly in flux and changing. Regular updated aerial or satellite imagery would assist Biodiversity and Social Teams with their planning and identify key issues.	PS6	An aerial or satellite imagery acquisition programme should be established, and data updated regularly e.g. every 3, 6 or 12 months. Ensure most cost-effective approach is adopted and challenge market place.	Low
Dec 2018 _027	Rehabilitation Programme	The rehabilitation programme has been delayed by a number of minor issues which could have been overcome.	PS6	The IESC recommends that focus is maintained and that the programme is properly started in 2019. Clear lines of management need to be established between Mining Operations and the Biodiversity Team.	Moderate
Dec 2018 _028	Social and Biodiversity cooperation	Community matters impacting Critical Habitat	PS6	CBG should further its current efforts to ensure greater cooperation between the Biodiversity and Social teams in order to address issues which arise and impact on	Moderate

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
				both people and/or Threatened species and Critical Habitat and wider biodiversity issues.	
Dec 2018 _029	Boulléré/COBAD Road river crossings	Exposed river banks caused by excavation/construction works.	PS6	Rehabilitation efforts should continue, to ensure that silty run-off does not occur in the wet season, when further excavation/construction activities are scheduled as part of the restoration of river bank profiles.	Moderate
Dec 2018 _030	Community Nursery and tree stocks	Community Nursery has become overgrown with weeds and has not been maintained.	PS6	The contract which covers the Community Nursery programme has expired and one of the nursery plots was overgrown with weeds. The IESC recommends that a maintenance contract is started to ensure these areas are cared for and maintained.	Moderate
Dec 2018 _031	Rehabilitation tree stocks	CBG has been holding a stock of 100,000 trees for more than a year.	PS6	It is important that a system is developed to ensure timely planting of trees and tree stocks are not held in pots over the dry season (thereby potentially weakening tree saplings).	Moderate
Dec 2018 _032	Community para-Botanists	Consider widening role to encompass Biodiversity.	PS6	Encourage and advise community para-botanists to develop their own Enterprise or NGO in order to supply services to CBG. Consider making them Trainers to develop wider network.	Low
Dec 2018 _033	Biodiversity surveys	Consider sharing data with GAC to broaden understanding of biodiversity in the area.	PS6	Exchanging and obtaining biodiversity data from adjacent concessions would assist CBG and their neighbour projects, increasing knowledge and encouraging cooperation.	NA

11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

11.1 Cultural heritage management documents

On 31 March 2017, 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 of 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 2017. Agreement was reached on the way forward and CBG confirmed that the revised and final version would be submitted at a later date.

The IESC confirms that it received revised versions of the CHMP and the CFP in the second half of 2018 and that it had no further comments.

APPENDIX 1 AUDIT ITINERARY

CBG IESC Monitoring Visit – during week commencing 26th November 2018

Participants:

Ramboll - Chris Halliwell, Ron Bisset, Phil Rogers

IFC

OPIC

Date	HSE	Social	Biodiversity
Day 1 Wed 28 th Nov	Drive to Kamsar (am) Kamsar office from 1pm – 6pm <ul style="list-style-type: none"> - Introductions (opportunity to meet new HSE&C resources) - HSE organograms & discuss future appointments - Project status update/ mine plan update - Plateau-by-plateau management – plateau case study (need to see its implementation) - H&S performance (safety statistics) – include follow up on recent incidents - ESMS – overview/audit programme/closure of audit actions (time permitting) 	Drive to Kamsar (am) Kamsar office from 1pm – 6pm <ul style="list-style-type: none"> - Introductions (opportunity to meet new HSE&C resources) - Social organograms & future appointments - Project status update/mine plan update (including current resettlement update/future plans) - Plateau-by-plateau management – plateau case study (need to see its implementation) - HR/ Labour Working Conditions - Community Relations issues (stakeholder engagement/ community grievances, Past-compensation Report, MUA resettlement actions, community H&S issues especially in Kamsar with respect to the railway) (Carine Gracia and team) – to be continued on day 4 if time constrained. 	Drive to Kamsar (am)

Day 2 Thur 29 th Nov	Morning – tour of Kamsar facilities including: <ul style="list-style-type: none"> - Site surface drainage - Oil/water separator/tank farm/discharge outside of the fence. - Oil spill equipment stockpiles (CH&PR) 	Social team travels to Sangaredi IESC will follow up on issues/questions raised by the Kankalaré gap analysis, to date, during days 3 and 5. Focus here is on Hamdallye (Day 2) and Fassaly Foutabhé (Day 3) <ul style="list-style-type: none"> - Meeting with CECl (in office) (Hichem Tabka and 	Biodiversity team to Sangaredi <ul style="list-style-type: none"> - Meet with new Biodiversity Manager and Biodiversity Team - Update on transition/hand-over from Johny R. – overview of biodiversity management
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	<ul style="list-style-type: none"> - Mangroves – area disturbed by soil dumping next to rail line – restoration update - Rail workshops (management of oil slops) - Expansion project facilities (crusher etc) - Waste management facility (Tora Bora) - Temporary waste stockpiles (same locations as Feb trip) <p>Afternoon (Kamsar office)</p> <ul style="list-style-type: none"> - Noise emissions and monitoring - Air emission and monitoring - Environmental monitoring (air, noise, water) - Transport and safety management – Road and Rail Safety 	<p>his team for all activities on Days 2 and 3)</p> <ul style="list-style-type: none"> - Meeting with Prefecture ((individuals met by OPIC previously) (HT and his team for all activities on Days 2 and 3) - Meeting with the Hamdallaye Resettlement Committee – excluding CBG members (Hamdallaye village) - Visit to new Hamdallaye village site and rehabilitated land ('land-for-land' strategy). Meeting in field with selected members of the 'land-for-land' PAPs. - Debriefing session (Hichem Tabka and team) 	<ul style="list-style-type: none"> - Update on implementation of Biodiversity management plans <p>On site offset projects (progress and implementation against programme)</p> <ul style="list-style-type: none"> - Review of BMS actions – update - Review of outstanding BMS Actions - Update on Sylvatrop surveys completed in 2018 - Forest Conservation Programme – update on proposals - Biodiversity offset (desktop discussion), including a CBG-specific update on progress to date (side meeting requested by IFC: IESC will not participate) - Review (with observation) of current mine development plans and status of any works/plans with info on biodiversity-related avoidance protocols/efforts to date (e.g. COBAD road, integration of biodiversity aspects into LDP and inspection pro forma) - Update on Bauxite Environmental Network and CBG involvement <p>Overnight Sangaredi</p>
<p>Day 3 Fri 30th Nov</p>	<p>HSE team travels to Sangaredi</p> <ul style="list-style-type: none"> - Active mining site (plateau management) - COBAD Road (including transfer station and crossing with the main road) - Maintenance and workshop area (walk over inspection) - Fueling areas - Waste management 	<p>Sangaredi</p> <ul style="list-style-type: none"> - Meeting with Fassaly Foutabhé (individuals met by OPIC previously) - Visit to Fasaaly Foutabhé 'community infrastructure' compensation projects - Visit to site of settlements expected to be physically/or economically displaced arising from exploitation of the Parawi-Koobi plateau: 	<p>Sangaredi</p> <ul style="list-style-type: none"> - COBAD Road – old alignment restoration (including water crossings) - New Boulere Road – especially watercourse crossing - Kagnaka – visit spring head and discuss chimpanzee / community relations/conflict - Community Plant nurseries

	<ul style="list-style-type: none"> ○ Visit the Sangaredi waste storage facility and discuss the status with management <p>Water</p> <ul style="list-style-type: none"> ○ Visit the water treatment facility in Sangaredi and discuss the upgrade status with the management <p>Travel back to Kamsar (by night fall)</p>	<ul style="list-style-type: none"> ○ Resettlement planning ○ Links to Kankalaré RAP <ul style="list-style-type: none"> - Debrief session (Hichem Tabka and team) - Selected current social investment projects (maximum number of 2) <p>Travel back to Kamsar (by night fall)</p>	<ul style="list-style-type: none"> - Ecological reinstatement / mining restoration (2018 ecological restoration sites) - level of success - Cogon River tributaries (south of Sangaredi) <p>Stay overnight in Sangaredi</p>
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<p>Day 4 Sat 1st Dec</p>	<ul style="list-style-type: none"> - Emergency Response Planning & Security Management Plan - Mine closure and reinstatement (reinstatement schedule) - Management of Change - IESC PREP TIME - CLOSE OUT MEETING <p>IFC drives to Conakry (pm)</p> <p>IESC stays on to continue discussions on specific management plans</p>	<ul style="list-style-type: none"> - Emergency Response Planning & Security Management Plan <p>Office meeting - Follow up on any items related to the gap analysis that are not addressed during days 2 and 3</p> <ul style="list-style-type: none"> - IESC PREP TIME - CLOSE OUT MEETING <p>IFC drive to Conakry (pm)</p> <p>IESC stays on to a) continue discussions, as necessary, on Day 1 items and 2) on specific management plans</p>	<p>Travel back to Kamsar (early)</p> <ul style="list-style-type: none"> - IESC PREP TIME - CLOSE OUT MEETING <p>IFC drive to Conakry (pm)</p> <p>IESC stays on to continue discussions on specific management plans</p>
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<p>Day 5 Sun 2nd Dec</p>	<p>Travel</p>	<p>Kamsar Office</p>	<p>Travel</p>
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<p>Day 6 Mon 3rd Dec</p>	<p>NA</p>	<p>Kankalare</p> <ul style="list-style-type: none"> - Visit to haul road from Parawi Ore Storage and Loading Bay to the Parawi-Koobi bauxite plateau (including location of hamlets from which all Kankalaré Phase 1 residents have moved and 1 hamlet where Kankalaré Phase 2 residents are still residing) - Visit to Parawi and Telibofi villages: <ul style="list-style-type: none"> ○ Meeting with signatories of the ‘Alerte_Communauté’ (23 July 2018) ○ Meeting with 6 Kankalaré Phase 1 HHs (including 2 women) representing relocated HHs ○ Location/s of school/s attended by Telibofi children - Debrief session (HT and team) - Visit to a COBAD road affected community <u>if time permits</u> <p>Travel back to Kamsar (by night fall)</p>	<p>NA</p>
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APPENDIX 2

PROJECT DOCUMENTATION MADE AVAILABLE FOR REVIEW

Ref no.	Document Title	Organisation
1	Procedure – Inspections, Auditing, Assessments and Reporting Compliance. Doc ref. CBG_HSEC_RO-1150. Version 1 Issued 01/01/2014	CBG
2	Certificate – OHSAS 18001	AFNOR
3	Certificate – ISO 9001	AFNOR
4	Certificate – ISO 14001	AFNOR
5	Permit to work (general template)	CBG
6	Permit to work in confined spaces (template)	CBG
7	Permit to excavate	CBG
8	Spreadsheet – senior management inspection schedule and corrective actions register	CBG
9	Spreadsheet – Corrective Action plan	CBG
10	Audit findings (internal and external audits)	CBG
11	Schedule of Senior management inspections (Sept to December 2018)	CBG
12	Schedule of Senior management inspections (2019)	CBG

APPENDIX 3

STATUS OF ISSUES IDENTIFIED IN PRECEDING MONITORING VISITS

Appendix 3.1 Status of Issues raised in February 2018 site visit report

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from July 2017 Report)	Significance	Open/Closed (Current IESC Opinion in Dec 2018)
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	Superseded It is understood that the Phase 2 ESIA is being reviewed by CBG. The Phase 2 ESIA will be subject to review by the phase 2 IESC as part of the Phase 2 Environmental and Social Due Diligence.
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	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. 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.	Moderate	Open/Ongoing Significant progress has been made towards the development of an integrated Operations and Expansion Project management system. Elements of the ESMS have been reviewed by the IESC and are approaching finalisation. (subsequently Closed in January 2019)

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; • 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>	High	<p style="text-align: center;">Closed</p> <p>Management plans have been re worked and include actions plans, approved by Senior Management, which identify responsible parties, timeframes etc.</p> <p>Note. Review of some management plans is ongoing at the time of reporting.</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	<p style="text-align: center;">Superseded</p> <p>(see PS1 section of this report)</p>

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	<p>Open (at time of visit then closed shortly after -see below)</p> <p>The ERP has been significantly modified in response to IESC finding and will be provide to Policy lenders on or before 31st December 2018</p> <p>Closed</p> <p><i>Post site visit note: the ERP has been received for review and is considered satisfactory.</i></p> <p>Closed</p>
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	<p>Closed</p> <p>The MoC procedure has been updated to take account of detailed comments provided by the IESC.</p>

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	<p>Open (at time of visit then closed shortly after - see below)</p> <p>The required documentation was not made available at the time of the December 2018 monitoring visit but received shortly afterwards. IESC is satisfied with the HR documentation at the time this report is issued.</p>
Feb 2018_008	Water Management Plan (WMP)	The current WMP has a number of shortcomings as described in the text above.	All / PS3	<p>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.</p> <p>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.</p>	Moderate	<p>Closed</p> <p>The water management Plan has been significantly revised, with inclusion of an Action Plan, to IESC's satisfaction</p>

Feb 2018_009	Oil spill - incident	<p>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.</p> <p>The new (2 year old) oil water separator has been malfunctioning and is under repair at the time of writing this report.</p>	Operations/PS3	<p>Confirmation is required that corrective actions are being implemented and that repair works to the skimmer are completed.</p> <p>CBG should confirm that post repair discharge of oil is compliant with IFC limits.</p>	Moderate	<p>Ongoing</p> <p>Repair works have been completed. Monitoring to confirm discharge limits can be met is ongoing. Preliminary results suggest oil concentrations have fallen but exceedances continue</p>
Feb 2018_010	Oil spill – use of chemical of dispersant	<p>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 the need to finalise emergency response plans, including oil and chemical response plans with predefined response strategies for credible incidents.</p>	Operations and Construction /PS3	<p>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.</p>	Moderate	<p>Closed</p> <p>Revised ERP has been reviewed and is considered satisfactory. HSEC team will be involved in oil spill response decision making to ensure no inadvertent harm to sensitive ecosystems during a spill response.</p>

<p>Feb 2018_011</p>	<p>Oil spill response – equipment stockpiles</p>	<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>	<p>Operations and Construction /PS3</p>	<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. 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>	<p>Moderate</p>	<p>Closed</p> <p>All oil spill response equipment has been relocated in a single area where unobstructed access is assured.</p>
<p>Feb 2018_012</p>	<p>Use of degreaser</p>	<p>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 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.</p>	<p>Operations/PS3</p>	<p>The use and discharge of Finasol should be 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.</p>	<p>Moderate</p>	<p>Closed</p> <p>CBG has confirmed the degreaser is no longer being used for general cleaning/wash down purposes. IESC confirms no evidence of Finasol during site inspection of rail workshops.</p>

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	<p>Closed</p> <p>Tora Bora has been redeveloped a temporary storage area provided for tyres</p> <p>Solvent stored in open containers within a secure waste management facility.</p>
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	<p>Closed</p> <p>IESC has reviewed and accepted the last round of changes.</p>
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	<p>Closed</p> <p>SMP provided to IESC for review</p>
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	<p>Superseded</p> <p>(an ongoing action through to April 2019 – see Dec 2018_015)</p>

Feb 2018_017	Relocation of Hamdallaye Village	There has a 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	Closed
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 provide the manpower to manage the road/rail crossing effectively.	Moderate	Open (pending finalisation of the solution)
Feb 2018_019	Provision of shade for new Hamdallaye village site	Following the failure of the campaign to plant acacia spp in 2017, 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	Superseded (planting not commenced as of Dec 2018 – see issue ref. Dec 2018_017)

Feb 2018_020	Security of tenure for Hamdallaye villagers	Provision of confidence to Hamdallaye villagers that they will not be relocated again.	Construction	Dissemination of reasons, to Hamdallaye residents and Advisory Committee, which explain why relocation will not occur again. Recording of agreements (in the form of a meeting Minute (<i>Procès Verbal</i>)).	Moderate	Open
Feb 2018_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	Superseded (See Dec2018_018)
Feb 2018_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 in place)	Superseded

<p>Feb 2018_023</p>	<p>Land acquisition</p>	<p>The RPF states that cash compensation will be provided for land acquired by CBG. Although 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><i>Post-visit note: 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>Construction and Operation/PS5</p>	<p>CBG 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.</p> <p>Based on the outcome of this review take immediate action to align its stated and disclosed 'policy' commitments with its actual practice. 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>High (Reducing to Moderate/Low following implementation of the new policy and adjacent recommendations)</p>	<p>Superseded</p>
<p>Feb 2018_024</p>	<p>Resources</p>	<p>Training requirements within the Biodiversity Team</p>	<p>Construction and Operations PS1/PS6</p>	<p>The Biodiversity Team would benefit from additional training to build up their skill and experience base.</p>	<p>Moderate (Minor if training plan is approved)</p>	<p>Closed Training plan established in being implemented; the team will require additional training on an ongoing basis.</p>

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	Closed Access to 4x4 vehicles has now been rectified and equipment needs have been met. Situation will further improve with transfer of Biodiversity team to Operations.
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 (on the basis that the Biodiversity team was scheduled to move to Operations at end 2018, IESC expects this item to be closed in near future)
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)	Closed New Biodiversity Manager started in September 2018 on a 2-year contract.
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	Closed Plateau-by-Plateau Management System has moved from conceptual to live.

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	<p>Open</p> <p>Action is outstanding. Clarification is sought for the role of the Biodiversity Team and Mining Operation Team.</p> <p>Progress made wrt restoration protocol and 50 ha restored in 2018. Plan expected at end 2018.</p>
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	<p>Closed</p> <p>Regular Control Monitoring now in place. Three additional Biodiversity staff members to fill for 2019</p>
Feb 2018_031	Land Disturbance Permit	Land Disturbance Permit (LDP) proforma does not systematically capture all of BMS requirements.	All / PS6	<p>Update proforma.</p> <p>HSEC team to monitor uptake of the LDP Procedure by CBG operations and record any instances of works not covered by a LDP.</p>	Minor	<p>Closed</p> <p>LDP system now live.</p>

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	Closed Contact in the community have been established and a joint strategy with the Community Relations Team has been initiated. Sylvatrop delivered first findings of Community Forest Management System.
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 A review is scheduled for Q1 2019. IESC will revisit this item in the next site visit. Biodiversity Action Plan now updated.
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 Fish studies budgeted for under Landscape management scope. IESC to revisit this issue in next site visit.
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	Closed Area has been restored and mangrove saplings planted.

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	<p>Open</p> <p>Concern from Biodiversity Team that there is no influence over COBAD</p> <p>Note. CBG Biodiversity Team visited the island in July and October 2018. Presence of Red Colobus needs to be confirmed. Budget included in 2019 to allow further studies.</p>
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 and used to inform a provisional long-term programme and appropriate budget allocation.	Moderate	<p>Closed</p> <p>A 5-year on site offset budget has been agreed with CBG management.</p>

APPENDIX 3.2 STATUS OF ISSUES RAISED PRIOR TO THE FEBRUARY 2018 SITE VISIT REPORT

Note, issues previously categorised as either superseded or closed, as reported in the February 2018 IESC monitoring report, are not repeated in this table

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in Nov 2018
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	Superseded
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	Closed Regular dust removal on the mineral quay has been implemented.
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 - Plant efficiency and effluent discharge quality 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.	Moderate	Closed A plan to upgrade the Sangaredi WWT plant has been agreed

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in Nov 2018
				Timeframes for this action should be independent of the Water Management Plan.		
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	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. Pending monitoring results, upgrade surface water drainage with silt traps/basic oil water separators.	Moderate	Superseded Item superseded on the basis this is now addressed via the Water Management Plan
July 2017 _013	Surface water drainage (Sangarédi)	Evidence of oil contamination in drainage channels within the Sangarédi maintenance workshop area.	Operations	Improved HSEC site inspections including close inspection of drainage channels. 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.	Moderate	Closed Source of oil contamination has been addressed and historical oil spill cleaned (as evidenced in Nov 2018 site visit)
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	Closed IESC revisited area in November/ December 2018 and confirms are has been redesigned/ contamination removed.)

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in Nov 2018
July 2017 _020	Community Health and Safety Management Plan	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 The plan should include consideration of non CBG traffic on the haul roads and newly created steep sided slopes.	Moderate	Closed
July 2017 _029	Access to school for pupils of Kankalaré hamlets and Telibofi	At present pupils from these communities attend Hamdallaye school. Once the village is relocated – the distance to school will be increased significantly.	Construction	Consider ways of ensuring that school enrolment and attendance by children of Kankalaré hamlets and Telibofi does not decline due to relocation of the Hamdallaye school. Select and implement the preferred option so that no disruption to attendance occurs.	Moderate	Open (status remains unchanged since Feb 2018)
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 (revisit during next site visit)
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 (pending receipt of the Plateau-by Plateau reference document)
July 2017 _038	COBAD Road	Restoration of river crossings yet to be initiated and no clear identification of responsible party to complete the works.	All	A restoration plan for the rivers needs to be developed. The responsible party to complete the works need to be	High	Open (Progress has been made since July 2017 on

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in Nov 2018
		Significant risk from sedimentation into gallery forest and watercourse critical habitats.		identified and the budget made available. Liaise with COBAD over works required to prevent sedimentation into gallery forest and watercourses.		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 vulture count in Sangarédi and Kamsar.	Minor	Open
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	Closed

APPENDIX 4 PHOTO LOG



Photo 1. Newly constructed dual wagon tippler



Photo 2. Primary crusher pit



Photo 3. Ramp and Phase 1 conveyor from base of crusher pit leading to secondary sizer



Photo 4. Conveyor and secondary sizer



Photo 5. Good use of harness and secure lanyard whilst working at height

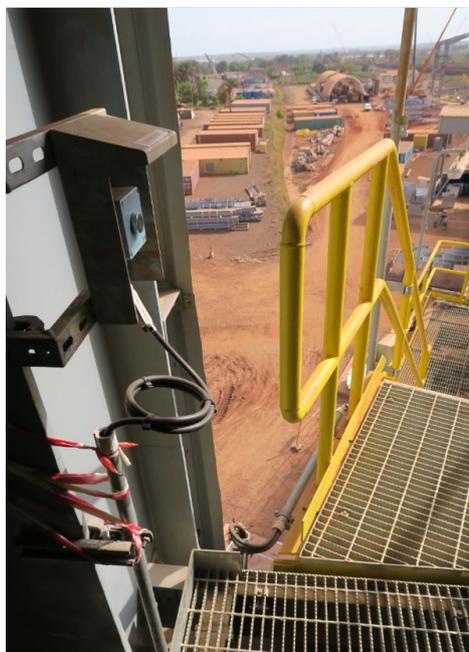


Photo 6. Gap in safety barrier at the secondary crusher present fall hazard



Photo 7. Tora bora waste facility – evidence of tyre burning (Feb 2018)



Photo 8. Tora bora site in Nov 2018 – site has been prepared ready for Tora Bora waste management facilities



Photo 9. Soil storage causing damage to mangroves (Feb 2018) – mangroves cleared



Photo 10. Remediation of area in shown photo 5 – soil removed and mangrove seedlings planted (November 2018) [some residual oil sheen visible – need to keep an eye on this]



Photo 11. Temporary waste storage area (north of secondary crusher) – partial filled drums without secondary containment remain since February 2018

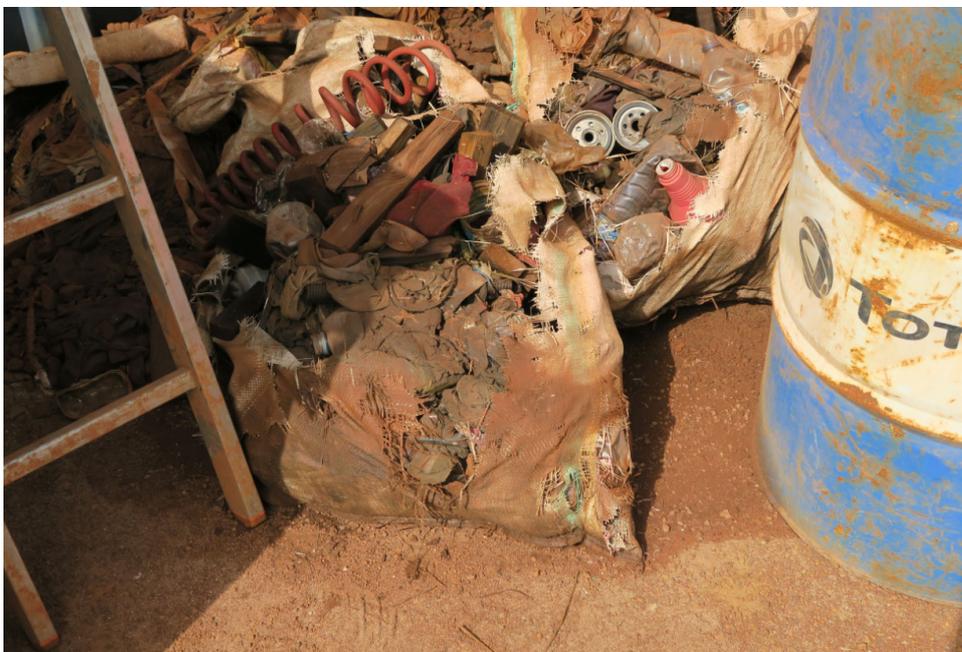


Photo 12. Hydrocarbon stains resulting from poor storage of oil contaminated wastes



Photo 13. Waste oil stored in open drums



Photo 14. Large volumes of waste accumulated since February 2018 encroaching on pedestrian access.



Photo 15. Large quantity of metal waste stored outside the temporary waste facility awaiting collection for recycling.



Photo 16. Long term storage of waste close to tank farm



Photo 17. Ongoing temporary storage of oil contaminated wastes following clean-up of a spill reported in Feb 2018.



Photo 18. Heavy oil contamination at decommissioned oil water separator



Photo 19. Dust plume from the dryer stack



Photo 20. Discharge downstream of primary oil water separator



Photo 21. (February 2018) Container with oil spill response equipment – access blocked by parked cars



Photo 22. New location for oil spill response equipment located close to a small jetty for deployment to sea and in an unobstructed area where cars are not permitted (Nov 2018).



Photo 23. Well managed waste water treatment facility in Kamsar



Photo 24. Good use of welding screen



Photo 25. Use of simple barrier tape around trip hazard



Photo 26. Newly power generator as part of phase 1 expansion project



Photo 27. Rotating machinery at ankle level adjacent to walkway – consider safety screen



Photo 28. Sewage treatment works, Sangaredi. Vegetation removed from filter beds.



Photo 29. Feb 2018 – blocked drainage channel and accumulation of oil at Sangaredi workshop boundary fence



Photo 30. November 2018 – oil has been recovered and culverts reopened. No evidence of oil in drainage channel.



Photo 31. Sangaredi landfill site – use of guards to deter human scavenging



Photo 32. Approaching active mining site – vehicle without flags



Photo 33. Thiapikour river crossing – poor H&S observed



Photo 34. Thiapikour river crossing – poor erosion control/evidence of sedimentation



Photo 35. Limited evidence of dust control on COBAD Road



Photo 36. COBAD haul road and N3 crossing – manned crossing with no evidence of vehicle congestion

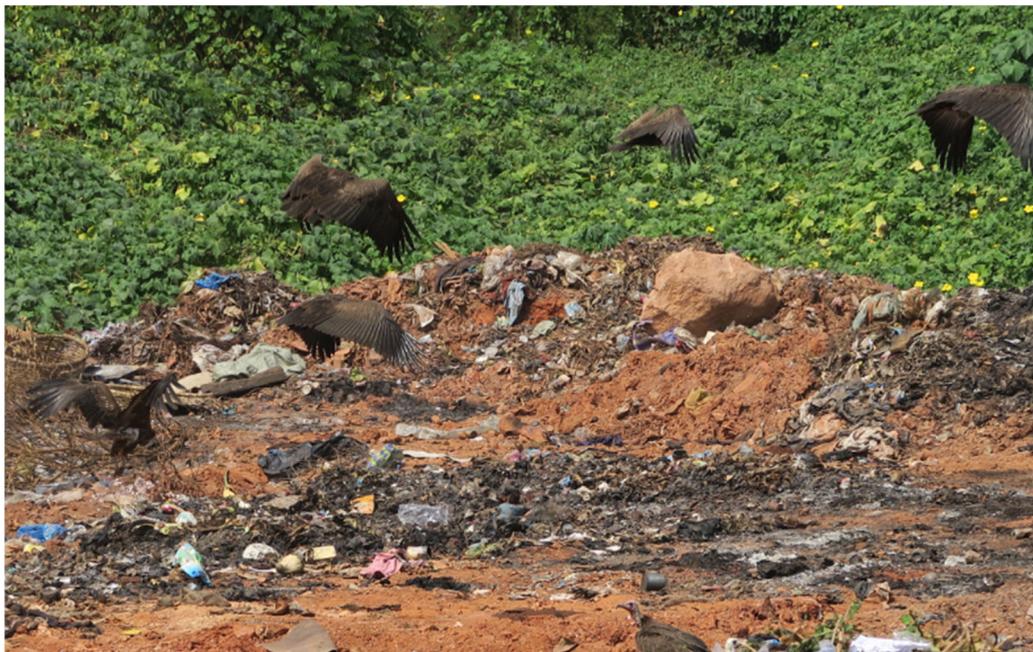


Photo 37. Vultures feeding at the Sangaredi landfill

