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

together, the Original Lenders and other Lenders as defined in the common terms agreement to be entered into between, among others, the Original Lenders, the Bank of New York Mellon and Compagnie des Bauxites de Guinée from time to time.

Date

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1700001699

CBG BAUXITE MINE PHASE 1 EXPANSION ENVIRONMENTAL AND SOCIAL MONITORING REPORT - JULY 2019

**CBG BAUXITE MINE PHASE 1 EXPANSION
ENVIRONMENTAL AND SOCIAL MONITORING REPORT
- JULY 2019**

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Status of Issues Identified in Preceding Monitoring Visits

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Photo Log

GLOSSARY OF TERMS/ ACRONYMS

Acronym	Abbreviation
BAP	Biodiversity Action Plan
BGEEE	Bureau Guinéen d'Études et d'Évaluation Environnementale
BMS	Biodiversity Management System
CO	Carbon monoxide
CO ₂	Carbon dioxide
CBG	Compagnie des Bauxites de Guinée
CFB	Chemin de Fer de Boké
CFP	Chance Finds Procedure
CHMP	Cultural Heritage Management Plan
CR	Community Relations
CTA	Common Terms Agreement
EEM	CBG's Environmental and Social (E&S) Consultants
EHS	Environmental, Health and Safety
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
E&S	Environmental and Social
ESMP	Environmental and Social Management Plan
GIS	Geographic Information System
H&S	Health and Safety
HR	Human Resources
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
KPI	Key Performance Indicator
LDP	Land Disturbance Permit
LTI	Loss Time Incident
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan
LWC	Labour and Working Conditions
MoC	Management of Change
MS	Management System
MUA	Multi-User Agreement (regarding the railway capacity expansion project)

Acronym	Abbreviation
MS	Management System
NO	Nitrogen monoxide
NO ₂	Nitrogen dioxide
NO _x	Oxides of nitrogen
NGO	Non-Governmental Organisation
O ₂	Oxygen
OPIC	Overseas Private Investment Corporation
PAP	Project-Affected Person
PM	Particulate matter
PM ₁₀	Particulate matter 10 micrometers or less in diameter
PM _{2.5}	Particulate matter 2.5 micrometers or less in diameter
PS	Performance Standard
Ramboll	The company fulfilling the role of IESC
RAP	Resettlement Action Plan
RN	Route Nationale
SEP	Stakeholder Engagement Plan
SMB	Société Minière de Boké - Winning Consortium Railway Guinea SAU
SO ₂	Sulphur dioxide
TRIR	Total Recordable Incident Rate
LTIR	Lost Time Injury Rate
WBG	World Bank Group
WMP	Water Management Plan
WWTP	Wastewater Treatment Plant

EXECUTIVE SUMMARY

In mid-July 2019¹, Ramboll UK Limited (formerly 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 July 2019 visit followed the fourth monitoring visit by Ramboll (Ramboll is used interchangeably with IESC hereafter) which occurred in December 2019. During the July 2019 visit, Ramboll was joined by representatives of the Policy Lenders, namely representatives from the International Finance Corporation (IFC), Overseas Private Investment Corporation (OPIC) and UFK/Euler Hermes (UFK). A four-person team from Ramboll assessed CBG's Health, Safety, Environment & Social (HSE&S) performance associated with: The Expansion Project (construction); the Multi-User Agreement (MUA) rail expansion project; ongoing operations; and to a limited extent, use of the COBAD Haul Road located within CBG's concession. At the time of the visit construction was largely complete and, with the exception of the new dryer, the new facilities were operational. 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) (MS);
- Performance of CBG's main contractors working on the Expansion Project;
- The implementation of a suite of environmental and social (E&S) management plans intended to address applicable Project Standards, notably the IFC Performance Standards;
- Progress towards incorporation of operations within the suite of management plans;
- Follow-up on those 'open' issues identified during previous site visits;
- Labour and working conditions;
- Stakeholder engagement and grievances;
- MUA rail expansion project with site visits;
- Security;
- Société Minière de Boké-Winning Consortium Railway Guinea SAU (SMB) proposal to construct a rail link in the CBG concession area (South Cogan); and
- Resettlement issues related to Hamdallaye/Fassaly Foutabhé; Kankalaré, and the Parawi-Koobi and Thiapikouré plateaux.

Specific elements of HSE&S performance were prioritised for review prior to the trip. In particular, resettlement issues affecting a number of villages in the mining areas and the MUA Project were a key focus. Other elements that were addressed during preceding visits, without significant concerns being raised, were not revisited on this occasion. During the site visit, the IESC also visited the MUA Project which involves doubling of sections of the railway line to increase capacity and enable other bauxite mining companies to export bauxite. The findings associated with the MUA Project are reported separately and not repeated in this report except where issues identified during review of the MUA Project are equally applicable across CBG's operations.

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.

¹ The monitoring visit was conducted from 15th July to 19th July 2019.

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

The monitoring visit covered a broad range of HSE&S matters. CBG has a team of Health, Safety and Environment and Community (HSEC) Relations specialists that are working to satisfy the requirements of the ESAP. A total of 45 findings (with accompanying recommendations) were identified during the monitoring visit. Of these 13 are considered High; 20 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 listed below.

High significance findings

1. *Community Relations Department staffing resources.* CBG (HSEC Director³) to review the staffing situation, irrespective of whether the planned addition of two new staff members in 2019 occurs, in the context of the expected role/workload for the Community Relations (CR) team and the role and size of similar departments in other mining companies in Guinea and other west African countries (benchmarking). Should the review indicate a need for additional staff then, CBG to prepare a time-bound recruitment plan to achieve the required complement of staff and that such recruitment be accepted by CBG senior management and be included in the HSEC budget for the next financial year.
2. *Hamdallaye resettlement – livelihood restoration.* Retain an experienced land reinstatement specialist and/or agronomist to review soil characteristics at all sites planned for crop agriculture and shade trees, prior to any relocation occurring, to determine what measures could be taken to make the soil cultivable. Trees (mainly fruit trees) are currently being planted with varying success. This will have to be monitored.

Should the review and soil suitability study results (for the 56 ha 'land-for-land' plot) indicate that the soil is not suitable for crop agriculture/shade trees, CBG to implement remedial measures which may include *inter alia* the following actions: (1) seek inputs from restoration specialists in CBG's mining department; (2) improve the reinstatement of the land accordingly; (3) carry out an additional soil analysis on the final soil profile; then (4) proceed with fertilisation (such as organic matter and mineral fertilisers), as necessary, based on the soil analysis results of the final soil profile.
3. *Kankalaré resettlement – Resettlement Action Plan (RAP).* Devise a livelihood restoration programme for Kankalaré based on principles similar to those applied for Hamdallaye and amend the RAP accordingly.
4. *Kankalaré resettlement – measures for host communities.* Expedite planning and implementation of these measures: a road to Parawi village and for Telebofi: provision of footbridge over the railway; erection of fencing along railway for the stretch where the railway passes beside the village; and iron-removal devices for wells.
5. *Forthcoming compensation (Thiapikouré plateau).* Prepare a Livelihood Restoration Plan (LRP) for economic displacement resulting from proposed mining on this plateau.
6. *Kankalaré resettlement – loss of community school.* Investigate this issue further (it is not mentioned in the current version of the Kankalaré RAP) and address it with relevant representatives of the Ministry of Education (perhaps in conjunction with the staffing issue related to the 'new' Hamdallaye school – see above).
7. *Forthcoming compensation.* Clarify criteria under which the 'streamlined compensation approach' is acceptable, agree these with IESC and Policy Lenders, and revise the Resettlement Policy Framework accordingly.

³ IESC is recommending staffing within the HSEC team should be the responsibility of the HSEC Director, on the understanding that the appointment of a replacement HSEC Director was imminent at the time of the site visit. Should the appointment of the replacement HSEC Director be delayed, the staffing review should be undertaken by other CBG management.

8. *Land access, compensation and resettlement – Implementation resources.* Consider the purchase of a dedicated IT solution enabling survey management, compensation, stakeholder engagement, and grievances, desirably with a link to a geographic information system (GIS).
9. *Hamdallaye resettlement – Gender and inclusiveness aspects.* Include women and youth in the Hamdallaye Resettlement Committee and any other such Committees established in the future.
10. *All activities – Gender and inclusiveness aspects.* Ensure presence of women and youth is required at all stakeholder engagement events.
11. *Fall stones/rocks.* CBG should investigate the source of the rocks found on mezzanine floors within the crusher pit. If these are found to have fallen from height, measures need to be put in place to prevent further falls and restrict access to dangerous areas where rocks might fall.
12. *Air quality – stack emissions monitoring.* Technical problems were encountered during the campaign 1 stack emission monitoring. Furthermore, operating conditions at the time of sampling were not fully representative of normal operating conditions. During future stack monitoring campaigns (Campaigns 2 and 3 to be combined as a single campaign in November 2019):
 - Sampling ducts must be free of dust/obstructions prior to the start of the sampling campaign;
 - Sampling probes must be of the correct length to ensure representative sampling;
 - Operating parameters must be representative of normal operating conditions, including normal variability (changes in fuel volume/fuel type/water use); and
 - Operating parameters (volume of bauxite dried), volume and composition (sulphur content) of fuel burnt and volume of water injected via the scrubbers must be accurately recorded during sampling. Also, sampling relative to the maintenance of scrubbers (clearing of water jet nozzles) should be known.

Air quality – stack emissions reporting. There was a period of several months between the phase 1 stack emissions sampling and reporting. Similar long timeframes following further sampling campaign(s) will jeopardise finalisation of the Air Quality Management Plan (AQMP) before the end of 2019. CBG must therefore ensure the company contracted to undertake stack monitoring is able to produce subsequent reports in a timely manner to ensure finalisation of the AQMP in accordance with timeframes agreed with the Lenders. Such timeframes should allow time for IESC/Lender review of a draft AQMP.

13. *Freshwater Critical Habitat.* A number of actions in the Biodiversity Management System (BMS), that relate to potential impacts on freshwater habitats identified as being critical habitat, have not been implemented. Relevant actions listed in the BMS, following review and revision of the BMS as described in Section 10.2.3, should be actioned as a priority.

Moderate significance findings

1. *HSEC Resources.* The HSEC team has been missing two key positions since January 2019: the HSEC Manager and Resettlement Manager. CBG must continue its efforts to secure suitable candidates for these managerial positions.
2. *HSEC Induction.* The induction should be modified to ensure visitors are aware of the procedure to follow in case of a serious security risk triggering a site evacuation.
3. *E&S Management Plans.* Implementation of tasks specified in Actions Plans (embedded within Management Plans) is behind the schedule for a significant number of actions. Timeframes specified in the Action Plans should be revised and Lenders informed of any changes via the Management of Change Procedure.
4. *Plateau-by-plateau approach.* The reference (guidance) document should be finalised as a priority and clarity provided on the use of modelling to inform plateau specific mitigation measures.
5. *Stakeholder Engagement Plan (SEP).* The SEP is time-bound (with an 'end' date of September 2017); however, CBG has prepared annual stakeholder engagement action plans, in 2018 and 2019,

which are directly linked to the SEP's principles and themes. Nevertheless, CBG to update and re-issue the SEP as soon as possible.

6. *Recording of grievances and community requests for assistance.* CBG to increase supervision of recording and tracking of grievances and community requests for assistance to ensure that the recorded data in the respective registers are accurate and consistent over time.
7. *Contractor/Sub-contractor labour and working conditions (LWC) management.* Once the Human Resources (HR) Manual is in place, the HR Director to prepare a brief implementation action plan to ensure that CBG will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This action plan to include capacity-building for key staff and, as necessary, revision to existing functional responsibilities.
8. *Workers' Grievance Mechanism.* CBG to require all its contractors, with immediate effect, to reinforce the message to both their own staff, and to sub-contractors, that CBG operates procedure whereby workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.
9. *Oil water separator discharge* - Oil concentrations downstream of the oil water separator continue to breach Project Standards. CBG should confirm its preferred solution for upgrade of the oil water separator and action the upgrade as soon as possible. Progress in this regard should be reported periodically to Lenders.
10. *Hamdallaye resettlement – sanitation.* Organise training of residents (including women and children) on toilet and shower utilisation.
11. *Hamdallaye resettlement – drinking water supply.* Form water users committee and establish linkage to be established with the national pump maintenance system, including private repairmen ("artisans-réparateurs") and certified spare parts dealers.
12. *Hamdallaye resettlement - drinking water supply.* Water should be tested for iron content and bacteria, and iron-removal devices should be provided, if necessary, prior to any relocation of households to the new village site.
13. *Hamdallaye resettlement – school and clinic.* Engage at high-level with the Ministries of Education and Health to facilitate timely allocation of staff to the Hamdallaye resettlement site school and clinic prior to completion of the relocation process.
14. *Hamdallaye resettlement – school.* Ensure that houses are built for teachers at the Hamdallaye resettlement site prior to completion of the relocation process.
15. *Hamdallaye resettlement – relocation.* Review progress of construction works at the resettlement site and implications to timing of the relocation.
16. *Hamdallaye resettlement – move and transition.* Devise a policy with regards to moving and transition support taking consideration:
 - The move should be planned to occur in successive waves of one or several lineages at a time; the exact date of the move for each wave should be notified to the community at least four weeks in advance. It seems adequate to plan the move over a total duration of about three weeks, in three waves of three days each (with the remaining two days of each of the three weeks as a contingency);
 - A moving allowance in cash should be paid some time before the move (ideally about two weeks); this moving allowance can be calculated either on a per household basis, or on a per individual basis; as a reference, Guinea Alumina Corporation, a neighbouring bauxite mining operation, pays USD 200 per household, which has been calculated to cover the hire of a tricycle and two labourers for several days;
 - On top of this allowance, specific transport assistance should be provided to identified vulnerable households; this should include the provision of transportation, assistance to

demolition and salvaging, and possibly medical assistance should some people be in a medical condition that may be exacerbated by moving; and

- A defined period (for example, 30 days from the official date of move) should be allocated to the community for salvaging of their construction materials, with the demolition taking place shortly thereafter. Demolition should preferably be undertaken by community workers specifically hired for that purpose, with health and safety supervision (key information on the activities to occur in this period, and timelines, to be disclosed to community members).

17. *Resettlement – grievance management.* Grievances should be lodged first with CBG and then reviewed with the Commune.

Resettlement – grievance management. An impartial grievance recourse mechanism should be put in place and disclosed to resettlement-affected communities.

18. *Review and update of the Biodiversity Management System.* The review of the BMS should be completed before the current Biodiversity Manager vacates his post, with any changes justified with notification of Lenders in accordance with the Management of Change Procedure.

19. *Appointment of new Biodiversity Manager.* The current Biodiversity Manager is due to leave CBG in mid-September. The IESC is aware of CBG's efforts to replace him and to ensure a smooth hand-over. Ongoing efforts to replace him are required as a priority.

20. *COBAD Road restoration.* The restoration of sections of the COBAD road completed to date has been properly executed appears to be successful. However, the IESC suggests that in those locations where the remaining unrestored road is wide enough for vehicles to pass, these should be reduced to the width of a walking path, non-passable by vehicles. Exceptions to this may be acceptable where particular needs necessitate, however the potential impacts upon biodiversity of such exceptions must be considered in detail, particularly where the impacts challenge the effectiveness of conservation efforts in the area, e.g. by increasing the complexity or costs.

The IESC also learnt about SMB's plan to construct a section of its railway through the CBG concession. CBG should continue to engage with SMB and the Government of Guinea to establish a collaborative working relationship such that it can influence SMB's E&S performance within the CBG concession. A protocol specifying applicable HSEC standards should be formally agreed between CBG and SMB as a matter of priority and Lenders kept informed about the management of E&S matters, preferably via provision of periodic written inspection reports.

The findings presented in this report should be incorporated within CBG's audit findings and closure process, with evidence of corrective actions described within agreed reporting deliverables and via ongoing liaison with Lenders and the IESC.

1. INTRODUCTION

Ramboll UK Limited (Ramboll) formerly, Ramboll Environment and Health UK Limited, was commissioned in September 2016⁴ by Compagnie des Bauxites de Guinée (CBG) to undertake environmental and social monitoring of the 18.5 million tons per annum 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/Euler Hermes (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 15th July to 19th July 2019 (hereafter the July 2019 monitoring visit) for the 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, the Expansion Project facilities, and the Multi-User Agreement (MUA) Project work sites. 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; and
- Port Manager.

The IESC also viewed contractors' facilities and had an opportunity to discuss HSE performance and certain aspects of labour and working conditions.

A team of four from Ramboll, comprising of Chris Halliwell, Adam Fitchet, Ron Bisset and Frédéric Giovannetti, accompanied by environmental and social (E&S) specialists from IFC, OPIC and UFK, travelled to Guinea to assess CBG's progress towards meeting the requirements of the Environmental and Social Action Plan (ESAP) and the various management plans referenced therein, and more broadly CBG's overall HSE and Communities (HSEC) performance.

Frédéric Giovannetti joined the IESC team to focus on non-MUA Project resettlement issues, enabling Ron Bisset to concentrate on other social performance topics (however, including MUA Project-related resettlement). Ramboll had last visited the CBG concession in December 2018, and six-monthly prior to that since its engagement in September 2016. Consequently, Ramboll has an in-depth understanding of the Project and CBG's operations and was able to focus its efforts on known key issues 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/newly operational areas;
- Re-visit sections of the COBAD road;

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/ Chemin de Fer de Boké's (CFB) contractors, for example, Systra and Sogea Satom (MUA Project) and CECI (CBG's implementing partner for the livelihood restoration programme for Hamdallaye and Fassaly Foutabhé);
- Visit to several MUA work sites and meet with a group of MUA Project-affected persons (compensated for loss of assets). Also, the opportunity was taken during these visits for impromptu meetings to be held with MUA workers on labour/working conditions issues;
- Visit key sensitivities within the concession including critical habitats;
- Visit villages that have been or will be relocated or experience economic displacement and meet with Project Affected Persons (PAPs); and
- Participate in face-to-face interviews with the HSEC team members including individuals tasked with leading on:
 - Biodiversity;
 - Health & Safety (H&S);
 - Social issues, specifically stakeholder engagement and involuntary resettlement;
 - Environmental monitoring;
 - Security;
 - Human Resources;
 - Reinstatement of mined areas; and
 - Community Health and Safety.

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) HSE (excluding biodiversity); ii) biodiversity; iii) social (excluding resettlement, except for the MUA Project) and iv) resettlement. This report presents key visit findings in sections that align with the applicable IFC Performance Standards (PSs). 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 ongoing role in monitoring CBG's HSEC performance.

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 the applicable IFC PSs and Project E&S commitments and in doing so, presents E&S risks associated with the Project. This report 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;
- 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).

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 14th - 19th July 2019. The tasks performed during this period are detailed in the audit itinerary (Appendix1). The itinerary was based on the four IESC specialists largely working independently on their own areas of specialism. Accordingly:

- The HSE specialists focussed on HSE documentation and primarily focused on activities in Kamsar;
- The biodiversity specialist travelled to areas of ecological sensitivity in the mining concession with the CBG biodiversity team in order to ground-truth CBG implementation of mitigation measures, including reinstatement of previously disturbed areas, as set out in the Biodiversity Management System;
- The resettlement specialist travelled to locations where resettlement has either been concluded, is in progress or is scheduled for the future, including Hamdallaye, Fassaly Foutabhé, and Kankalaré, to meet with PAPs and gain a full appreciation of CBG's management of resettlement issues; and
- The social specialist examined all social issues other than the resettlement-related issues (described above), including stakeholder engagement, grievance management, labour and worker conditions, provision of security, and community health and safety.

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 PSs (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 EHS Guidelines applicable to the Project.

PS7 (Indigenous Peoples) was excluded from the scope of the monitoring visit as 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 PSs 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 PS.

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 December 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, the IESC has 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 of the Expansion Project was largely complete and new facilities operational. Ramboll experienced no constraints in its ability to inspect all operational/construction areas/activities.

3. PROJECT STATUS

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

3.1 Status of the Expansion Project

At the time of the audit, construction of the Expansion Project was approaching completion with completion testing well underway. Construction contractors associated with the Expansion Project had left the site with relatively few personnel remaining. 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);
- New crusher pit and associated facilities (tippler, secondary crusher and new conveyor belts) were operational;
- New power generating unit installed and operating in Kamsar;
- Modification of rail wagons needed for new tippler complete;
- Construction of new dryer is ongoing and scheduled for completion in Q4 2019/Q1 2020;
- Extension to the mineral quay (jetty) complete;
- Rail construction (for the Phase 1 expansion) complete;
- Construction and commissioning of the new dryer was ongoing;
- Hamdallaye (new) – construction of infrastructure and housing is advancing with layout of houses (grouped by lineage) completed. The design of toilets and showers has been finalised and six drilled wells with a hydro-pneumatic handpump ("Vergnet") have been completed; and
- Fassaly Foutabhé – considerable progress has been made since the end of 2018 as follows:
 - The pedestrian / motorcycle bridge meant to ease access to both parts of the settlement (including the piece of land earmarked for income generating activities) is being built and is virtually complete;
 - The school is well advanced, and completion is expected shortly;
 - The well has been drilled and is operational (the iron removal device is not in place); and
 - The *Almadjaja* prayer room has been built.

Figures 1 and 2 provide a visual indication of construction progress. Further construction/facility photos are provided in Appendix 4, photos 7, 10, 11-13.

Figure 1: Extended jetty, capable of accommodating 2 bulk carriers (courtesy of CBG)



Figure 2: Operational conveyor belts and secondary sizer (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 ⁵	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

⁵ Phases can include: construction; operations; decommissioning or; any combination of these phases.

ID	Aspect	Issue Description	Phase⁵	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 has obtained ISO14001, ISO 9001 and OHSAS 18001 certification that will remain valid until March 2020. The recertification of Occupational Health and Safety, Quality and environmental management systems will be revisited during the next IESC site visit when recertification will be approaching.

5.1.2 Closure of Earlier IESC findings (summary)

The IESC was provided with a document indicating the status/corrective action(s) against many of the IESC's earlier findings listed in the IESC's December 2018 monitoring report.

Issues identified in the previous site visit were revisited in July 2019 and updates are provided throughout this report. Appendix 3.1 – 'Status of issues raised in December 2018 site visit report', also provides a consolidated status update by the IESC. Of the 33 issues raised during the previous site visit, 16 are considered by the IESC to be closed or superseded and 17 are open/ongoing⁶.

5.2 HSEC responsibilities and resources

5.2.1 Senior HSEC positions

The IESC has highlighted, previously, that the high turnover of senior HSEC staff is disruptive to CBG's management of HSEC issues. At the time of the July site visit, CBG had been missing experienced staff to fill two key positions; the HSEC Manager⁷ and Resettlement Manager posts. The IESC was also made aware that the Biodiversity Manager is planning to move another position outside of CBG soon. The IESC also acknowledges the number of ongoing activities that are drawing upon the HSEC team and a general strain on HSEC resources, particularly relevant to certain individuals, caused by the heavy workload.

The HSEC and Resettlement Manager positions have been vacant since the start of January 2019. While the IESC is aware of the efforts CBG has made to identify suitable candidates, the IESC must nevertheless reemphasize the necessity to find and recruit suitable candidates as a key priority, both in order to relieve some of the strain currently being experienced by CBG HSEC staff and, also, to provide strategic guidance going forward.

Post visit note: In August 2019, during the finalisation of this report, the IESC was made aware that offers had been made for both the HSEC and Resettlement Manager positions. At the time of issue of this report the position of Resettlement Manager had been filled.

The Biodiversity Manager has agreed to a managed transition from CBG to his new employer, working part-time for CBG until a suitable new recruit is found for the Biodiversity Manager position. The approach is unlikely to be sustainable in the long-term but is certainly welcomed by the IESC for the short-term.

CBG has also recruited an Environment Team Leader since the previous IESC site visit. The recently appointed Environment Team Leader and his team of six environmental specialists have demonstrated a high level of competency and made significant progress since the preceding trip.

⁶ Ongoing actions include long term actions where good progress may have been made.

⁷ CBG has restructured its existing HSEC resources to include an interim HSEC Manager until a permanent solution is found

5.2.2 Community Relations

The Community Relations (CR) team remains stable and effective under the leadership of the CR Manager. However, the CR Manager's contract terminates on 23 September 2019 (Note: the IESC is not yet informed whether the CR Manager's contract has been/will be renewed again). Thus, at the time of drafting this report, there is uncertainty regarding the CR Manager position which is not conducive to maintaining team morale and momentum. It is hoped that the situation will be clarified soon.

The CR team has four personnel based in Kamsar and three in Sangarédi. The number of staff members has remained basically the same since the IESC began its monitoring visits (the planned addition of two new staff members in 2019 has not yet occurred). In the past few years, the scope of the CR team's work has expanded with an increasing role in managing all resettlement-related activities, such as the MUA Project. This has occurred, partly, because of the resignation the 'Resettlement Manager' at the beginning of 2019 (of note, the CR team works closely with the 'Resettlement Coordinator'). During the July 2019 monitoring visit, the IESC learnt that the CR team needed to hire *stagiaires* (trainees who may/may not be employed upon completion of the period of work placement) to assist with 'resettlement-related activities for proposed mining activities on the Thiapikouré plateau.

The pressing need for recruitment of additional staff has been recognized by the IESC following previous monitoring visits; however, the results of the July 2019 visit show, clearly, that a significant proportion of CR team time and resources are devoted to non-core activities and that several key core activities, stakeholder engagement; community grievance management and community investment projects are not receiving the necessary attention. The expected appointment of a Resettlement Manager will alleviate some of the pressure, but in the view of the IESC, not to an extent that will result in a material improvement in the current situation. It is recommended that CBG requires the HSEC Director to review the staffing situation, irrespective of whether the planned addition of two new staff members in 2019 occurs, in the context of the expected role/workload for the CR team and the role and size of similar departments in other mining companies in Guinea and other west African countries (benchmarking). Should the review indicate a need for additional staff then, CBG to prepare a time-bound recruitment plan to achieve the required complement of staff and that such recruitment be accepted by CBG senior management and be included in the HSEC budget for the next financial year.

5.3 HSE Performance

5.3.1 HSE Induction

The Lender group was given an HSE induction on day 1 of the visit. The induction was considered appropriate for the nature of the site visit risks. See also Section 5.4, Security Induction.

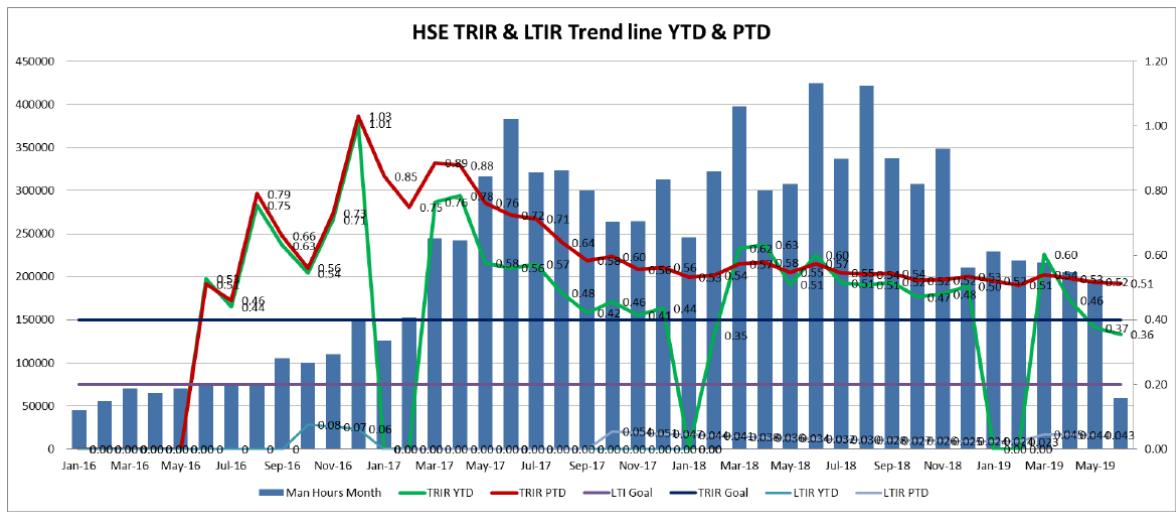
5.3.2 Expansion Project

CBG has several Key Performance Indicators (KPI) based on H&S metrics for the Expansion Project, including *inter alia*:

- Medical treatment cases;
- Lost Time Injuries (LTI); and
- Total Recordable Incident Rate (TRIR).

Figure 3 provides a summary of H&S performance for the Expansion Project.

Figure 3: Summary of H&S key performance indicators (through to June 2019)



With the Expansion Project construction largely complete man hours per month have fallen significantly. The TRIR is marginally below the target goal (Target is 0.4) and LTIR is comfortably below the target.

5.3.3 Operations

The same metrics are recorded for operations. TRIR for operation is 0.18 based on a rolling 12 period compared with a more stringent target of 0.2⁸.

The metrics show 2019 year to date to be comparable with previous years except for Lost Time Injuries where there have been three (year to date) compared with three or fewer in previous full years.

Further discussion concerning H&S observations made during the site visit is provided in Section 5.3.4.

5.3.4 Site observations

The IESC undertook a brief walk over inspection of the Kamsar facilities, including the Expansion Project area. In contrast to previous visits, Expansion Project construction was almost complete and once busy construction sites now have very few personnel/construction activities. A few observations were made. The IESC viewed ongoing operations in the crusher pit and noted loose stones/rocks on mezzanine floors, stair wells and other accessible areas (Photo 14). The rocks appeared to have fallen from height, probably during unloading of wagons by the tippler, and would therefore have been capable of causing serious injury.

CBG should investigate the source of the rocks. If these are found to have fallen from height, measures need to be put in place to prevent further falls and restrict access to dangerous areas where rocks might fall.

The IESC also noted deposition of fine particles which are washed to sumps at the bottom of the crusher pit before being pumped and discharged at ground level. The IESC was informed that effluent is currently discharged without treatment, but that CBG is currently building a settling pond in accordance with the original design to receive wash down effluent from the crusher pit. Water from the settling pond will be reused for dust suppression purposes along roads subject to

⁸ Target incident rates for Operations are lower than for construction due to the generally less risky nature of more steady state Operations.

water quality evaluation. Given ongoing operation of the new crusher the construction of a settling pond is required as a priority.

Noise protection signage was not evident in the in secondary crusher. The IESC was informed that signage had been ordered. In the interim, the IESC recommends temporary signage should be used and ear protection made available at appropriate locations.

5.3.5 Diving fatality – corrective actions

In the December 2018 site visit report, the IESC reported that a formal investigation had been conducted following an incident resulting in the death of a diver in the Kamsar port on the 29th October 2018.

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

- An on-site control system (work permit, critical task analysis, tool box talks and equipment certificates);
- Development of a dive works permit delivery process;
- Port critical tasks safety review (external audit); and
- Further training for employees.

During the July 2019 site visit, the IESC met with the Port Manager to discuss the accident and measures since put in place to reduce the risk of further diving incidents. During the meeting it became apparent no diving was permitted⁹ and that a CBG diver had chosen to ignore CBG protocol and instructions and proceed with the unauthorised inspection of a ship's propeller using unapproved divers.

The IESC was shown evidence of the authority to work (used also for diving) which includes a critical task analysis and written approval from both the Port Manager and an HSEC representative.

The IESC was further informed that no further diving has taken place since the incident: instead vessels requiring inspection/maintenance have been lifted out of the water. CBG is also in the process of purchasing an aqua drone to further reduce the need to use divers. For instances where divers must enter the water, in the future, CBG will contract a firm of certified professional divers to undertake any essential diving activities. The qualifications of all divers will be checked, and the contracted dive firm will be required to abide by CBG procedures.

5.4 Security induction

The IESC has previously reported the omission of a security briefing during Day 1 inductions, and in particular that muster points are not communicated in the event of an evacuation from site in the case of a major security threat. During the July 2019 site visit, there was no security/evacuation briefing.

5.5 Environmental and social management plans

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

⁹ Three CBG divers were required for any dive, however CBG did not have three divers in employment at the time of the incident.

A key component for many of the management plans is the inclusion of an action plan, detailing firm commitments to undertake future actions with timeframes and responsible parties identified. The management plans provide the basis on which CBG will manage its HSEC performance going forward, and therefore provide a useful tool for internal audits in the future. Thus, the IESC will measure CBG's progress and performance against the commitments made in the management plans, and the action plans. During the site visit progress made towards the implementation and/or execution of specific tasks listed in the action plans was assessed for several topic-specific management plans.

The Environment Team Leader is responsible for implementation of actions within the environmental plans, including those concerned with waste, water, air quality, noise and vibration, resource use, dredging, hazardous waste, environmental monitoring and contractor management. The Environment Team Leader has assigned responsible parties and deputies to each action plan, referred to as primary and secondary 'Plan Champions'. A system of tracking has been introduced to measure progress and, in general, progress is being made, particularly since the recruitment of the Environment Team Leader in January 2019.

Whereas the IESC recognizes good progress in many areas, including progress on long overdue issues relating, for example, to waste and water management, it is also evident that progress is well behind the schedules outlined in the action plans. This may be in part due to the delays experienced in finalising the management plans/action plans making timeframes specified in the action plans already challenging at the time of sign-off, but also that the timeframes were overly ambitious irrespective of the delayed finalisation of the plans. The IESC, therefore, recommends that the timeframes specified in the action plans are revisited and more realistic timeframes considered. In the likely event that CBG seeks to amend the timeframes, Lenders will have to be informed in accordance with the Management of Change (MoC) Procedure, noting any change to the management plans is will be categorized as a Category 2 change.

The IESC is aware that CBG will need to review and potentially update the management plans to incorporate mitigation measures/actions specified in the MUA ESIA Report and any supplements to the MUA ESIA Report. There is, therefore, an opportunity to make multiple changes in a single revision thereby limiting the number of MoC notifications necessary.

Further discussion for specific plans is provided elsewhere in this report as follows:

- Management of Change (Section 5.7);
- Water management (Section 7.2);
- Waste management (Section 7.3); and
- Air quality (Section 7.4).

5.6 Plateau-by-plateau approach

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 topic-specific management plans. The Environment Team Leader has responsibility for the plateau-by-plateau and Land Disturbance Permit (LDP) processes, supported by PBP champions from the Biodiversity and Environment teams.

The IESC has previously expressed its support to the plateau-by-plateau approach developed by CBG and continues to view the approach and its implementation to date favourably. However, the following observations are made:

- During the December 2018 visit, CBG provided an update on the plateau-by-plateau management of its mining operations. At that time, it was understood that CBG was finalising a plateau-by-plateau reference document that would 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, LDP and roles and responsibilities). During the July 2019 visit, the IESC was informed that the reference document was undergoing review by senior discipline leads. The document should be finalised a matter of priority; and

- Certain management plans include commitments to detailed modelling studies in order to support the plateau-by-plateau approach. To date, these modelling studies have not been carried out and CBG is questioning the necessity and value of the plateau specific modelling studies. If CBG decides the modelling studies are unnecessary, any decision to remove commitments to modelling studies within management plans (e.g. water, noise and vibration and air quality management plans) will have to be discussed with Lenders and be subject to the MoC Procedure.

5.7 Management of Change

During the IESC's consideration of the MUA Project (reported separately) it was apparent that the MoC Procedure is not being used consistently throughout all CBG operations. The IESC is aware that an ongoing awareness and training programme is currently underway to rectify this situation. The IESC supports the current efforts to roll out the MoC Procedure and will continue to monitor CBG's application of the procedure during subsequent monitoring visits.

5.8 Stakeholder Engagement

The CBG Stakeholder Engagement Plan (SEP) is time-bound (with an 'end' date of September 2017); however, as an interim measure to enable stakeholder engagement to continue in a planned manner, CBG prepared and implemented an Action Plan for Stakeholder Engagement for the period 2017-2018. Subsequently this Action Plan has been superseded by a similar Action Plan for 2019.

The 2017-2018 Action Plan includes a total of 202 villages (covering the rail/port and mining areas). The Action Plan requires a set number of community/other meetings by topic and area. The 2019 Action Plan follows a similar pattern. Of note, the 2019 Action Plan focuses on 232 villages as CBG has identified 30 'new' villages including villages that are located outside the mine concession area, but which could be affected, potentially by mining activities. There are 109 mine villages and 123 near the railway and port. Since 2015, 188 villages (81% of the total) have been consulted/sensitized as follows:

- Mine: 97 villages with 38 %; and
- Port/rail: 91 villages with 49 % being consulted/sensitized more than once.

During the November 2018 site visit, the CR team indicated the difficulties it faced in implementing its engagement activities. These were reiterated again in July 2019 as being:

- Logistical difficulties (transport) in travelling to/from meeting locations; and
- Time being spent on managing both community-level engagement and resettlement issues relating to the MUA Project and Hamdallaye/Fasaly Foutabhé, Kankalaré and more recently Thiapikouré.

The CR team is conscious, also, that it has not engaged with villages identified in the CBG Expansion Phase 1 ESIA Report, as being located on small islands near Kamsar. It does not have the time or resources to identify their exact locations (they may in fact be temporary camps used by fishermen during periods when fishing most profitable) and to visit them. To engage with these villages is one of the aims of the 2019 Action Plan.


Key priorities for the second half of 2019 include *inter alia*:

- Updating of stakeholder mapping (first done for the SEP);
- Engage with all villages planned for 2019 with a focus on identifying and sensitizing the island villages; and
- Reinforcing dissemination of key messages to communities/local authorities through use of poster/noticeboards at key strategic sites.

The CR team realizes that the SEP needs to be updated (following review of the stakeholders currently listed in the superseded SEP and addition of new stakeholders such as the island villages) and issued. It is recommended that work begins on this task as soon as possible.

The Community Relations department has analysed its performance against both Action Plans: by topic and locality (mine and rail/port). Performance varies significantly across topic/locality in terms of actual number of meetings against target. Figure 4 provides a section of a breakdown of port/railway village participation for certain key SEP themes, for example, the second row shows that, as of July 2019, 75% of targeted villages (123 planned) participated in events regarding community health and safety with respect to rail and road transport and that 88% of mine villages (109 planned) participated in events regarding the community grievance mechanism and the compensation process. Performance varies, for example, only 44% of mine villages (45 planned) were engaged with respect to cultural heritage issues.

Figure 4: SEP Action Plan 2019: Implementation by theme and sector as of July 2019



Mise en œuvre par thématique et par secteur du plan d'action SEP 2019

Thématique	Action / mesure d'atténuation	Échéance	Secteur mine		Secteurs rail-port)		Observation
			Nombre localités/ activités planifiés	% couverture/ Exécution	Nombre localités/ activités planifiés	% couverture/ Exécution	
Mécanisme de gestion et de traitement des plaintes et compensation	Présentation ou diffusion du mécanisme de gestion et de traitement des plaintes et du processus de compensation de la CBG dans toutes les localités de la concession.	31/12/2019	109	88%	123	75%	
Sécurité Ferroviaire et routière	Sensibilisation des communautés à la sécurité ferroviaire et routière.	31/12/2019	2	0%	91	75%	
Sécurité maritime	Sensibilisation des communautés à la sécurité maritime.	31/12/2019	NA	NA	24	45%	Difficulté d'identification des îles concernées. Les autorités ont été mise à contribution sans succès. Elles affirment que la plupart sont des campement de pêcheurs qui s'établissent en une certaines période propice à la pêche.
Bruit et vibration et poussière	Informer et sensibiliser les communautés sur les impacts liés à la poussière, au bruit et à la vibration y compris le minage	31/12/2019	109	88%	123	75%	

5.9 Grievance mechanism

CBG continues to track grievances and community requests for assistance (classed along with 'concerns' as *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. In 2018, there were 10 grievances recorded. For 2019 year-to-date (end June

2019), there has been an increase to 21 grievances received (See Figure 5) mostly relating to activities in the mining area. The increase in grievances in 2019 is attributed by the CR team to several *doléances et préoccupations* being treated as grievances and to the MUA Project, particularly as MUA Project civil works were in progress during 2018.

In its November 2018 monitoring report, the IESC listed four grievances from the period 2015 to 2017 that were open and thus a cause for concern due to the elapse of a lengthy time period with no resolution to the grievances. In July 2019, CBG reported progress in actions to close them. Figure 6 provides the number of open/closed grievances. The single grievance from 2015 is closed. Rehabilitation work needed, before one of the 2016 open grievances (Bintimodia quarry) can be closed, is underway. Once completed, it is expected that this grievance will be closed quickly. The other open 2016 grievance is reported as closed. Actions needed prior to being able to close the two open 2018 grievances are underway, including the grievance raised by the villages of Fassaly Foutabhé and Fassaly Belenderé regarding pollution of a watercourse. The remaining open 2018 grievance, concerning a fire affecting cashew trees at Bhoundouwadé, is now under judicial review following an application by the affected communities. Considerable work is being undertaken to close out the remaining open 2019 grievances. To summarize, one grievance remains open from 2016 (expected to be closed soon); two grievances remain open from 2018 (one of which is expected to be closed soon) and 11 are open for 2019 year-to-date.

Figure 5: Number of grievances by year: 2015 to 2019 year-to-date

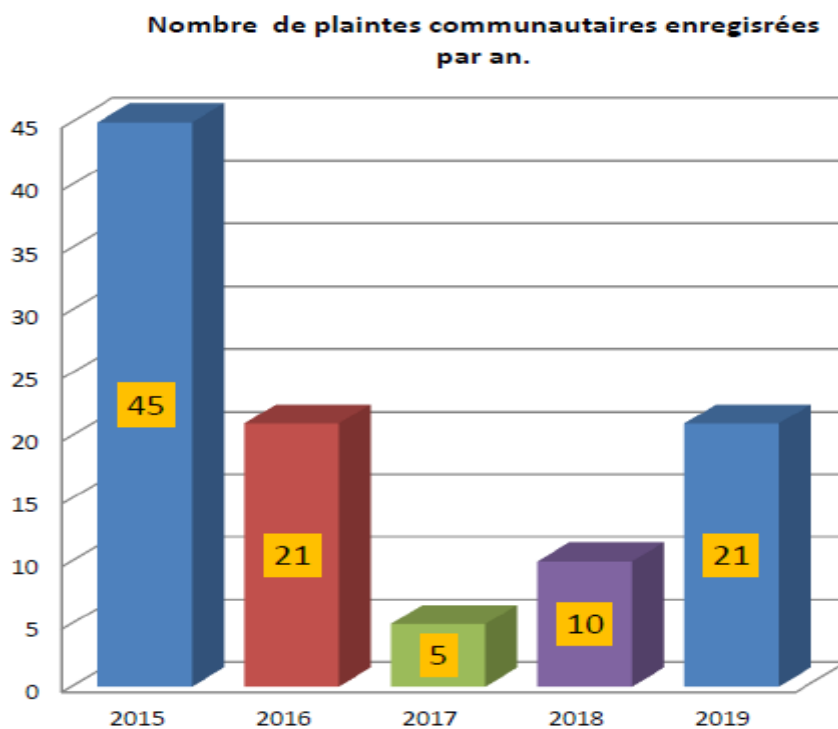
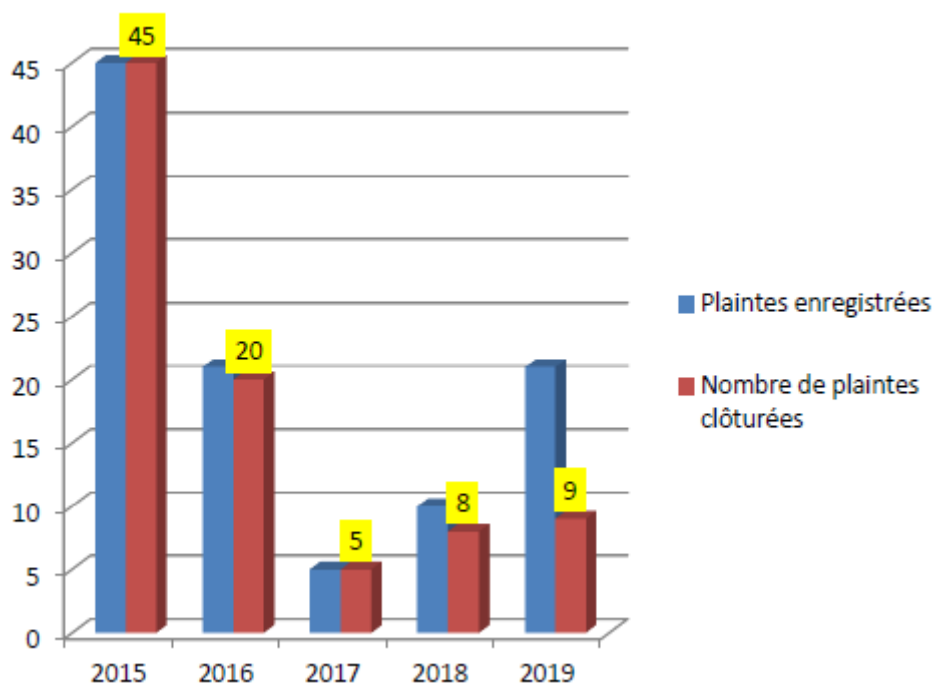


Figure 6: Grievance data for period 2015-2019 (year to-date)



There is no separate MUA Project system for managing grievances and community requests for assistance (*doléances et préoccupations*). When these grievances and requests for assistance are received by CFB (or CBG) they are logged into the appropriate CBG registers. As mentioned above the distinction between grievances and community requests for assistance is not always clear and CFB/CBG admits that some of the community requests for assistance could be classed as grievances.

In its work related to the MUA Project, the IESC has noted that the number of grievances/community requests for assistance and their descriptions differ according to the format and timing of presentation to the IESC. Although these formats are designed to present data in specific contexts, this variation increases the likelihood of errors occurring. To avoid potential future confusion, CBG needs to increase supervision of recording and tracking of grievances and community requests for assistance to ensure that the recorded data in the respective registers are accurate and consistent over time (this recommendation applies to the MUA Project and all CBG -wide grievances and community requests for assistance).

5.10 Emergency planning

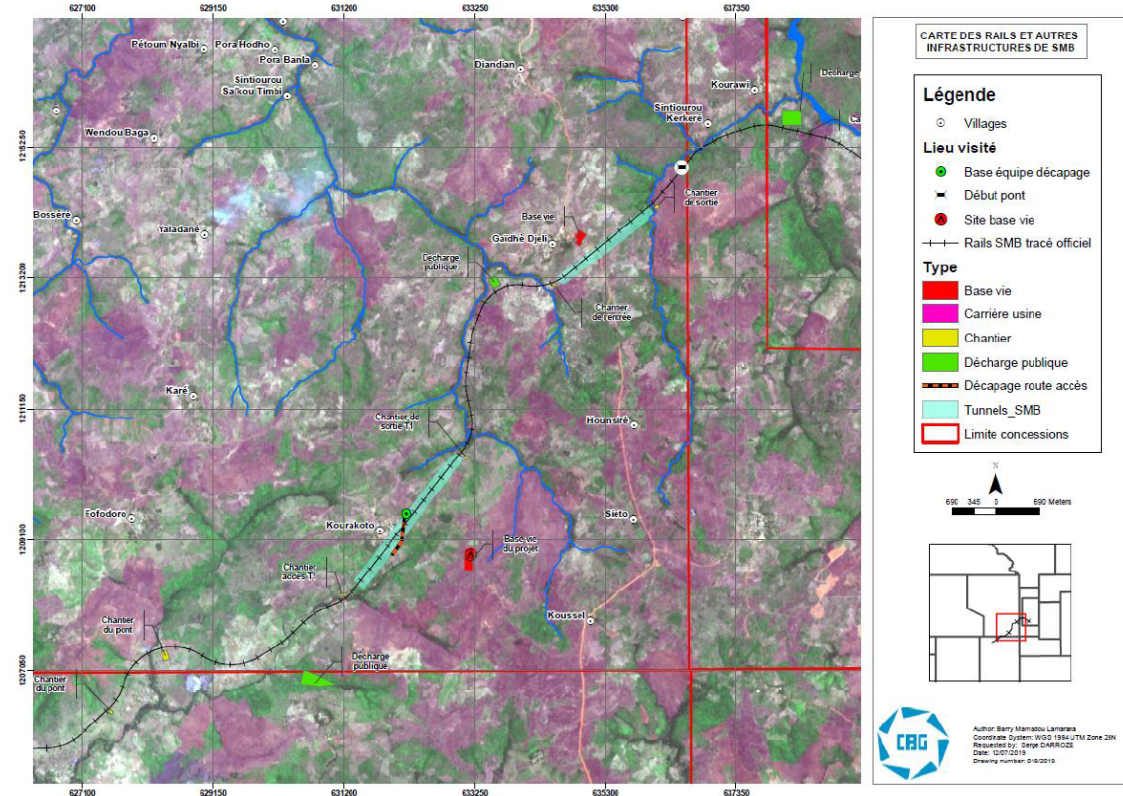
The structure and content of the Emergency Response Plan (ERP) has been discussed in preceding IESC monitoring reports. The ERP was restructured and simplified in 2018 such that it was considered an operational plan by the IESC (and CBG) in late 2018 and finalised in January 2019. The content and structure of the plan was not a topic for consideration during the recent site visit, however the IESC notes the changing nature of the Project following cessation of construction and the need to schedule emergency response exercises in accordance with the changing nature of the project’s risk. More specifically, CBG should consider an emergency exercise that includes the medical evacuation of personnel from within the crusher pit, for example, evacuation of an unconscious casualty from a mid-level platform.

5.11 SMB Railway

Shortly prior to the July 2019 monitoring visit, lenders were informed of a section of a railway that is planned to be built in the south-east corner of CBG’s South Cogon concession. The railway will be built by SMB to allow export of bauxite from SMB’s concession to the east of the

Cogon South concession. Due to the undulating terrain in the area, the railway line will pass through two tunnels of 2.75 km and 1.86 km in length. The overall length of railway within the South Cogon concession extends to 13.25 km.

Figure 7: Proposed SMB- railway within CBG’s South Cogon concession



In July 2019, a ‘*Protocole d’ Accord*’ was signed between CBG, SMB¹⁰ and the Government of Guinea regarding management of E&S issues. Of note, whereas the railway will pass through the South Cogon concession, the Project is considered a project of national interest and CBG does not have the authority to prevent or its construction or operation and must, therefore, work with SMB and the Government to exert influence in a collaborative manner.

Since being made aware of the railway project, CBG has engaged with SMB and the Ministry of Environment, Water and Forest’s Secretary-General to discuss the Project design, potential impacts and possible mitigation measures. During initial meetings, CBG questioned whether the railway could be rerouted to avoid CBG’s concession, however CBG was informed that the terrain made such an option unrealistic. CBG therefore requested a temporary halt to any construction activity (SMB has a permit and has started early clearance work on the main road to Kourakoto) to allow field visits and meetings with SMB. During these meetings CBG has explained the standards it has adopted (including the IFC PSs), and in meeting on the 14th July certain standards/mitigation measures were verbally accepted for formalisation within a written protocol. SMB is currently in the process of preparing an EIA Report for the railway thus allowing inclusion of mitigation measures that are aligned with CBG’s Management Plans/IFC PSs.

At the time of the July site visit, CBG was in the early stages of engagement with SMB and therefore itself learning about the railway and the associated E&S implications. Members of the CBG HSEC team have been deployed to gain an appreciation of the environmental (especially ecological sensitivities) and social context in the railway project area.

¹⁰ In effect, the agreement is between Winning Consortium Railway Guinea SAU, CBG and the Government. Winning Consortium Railway Guinea SAU is a member of the Consortium referred to in this report as ‘SMB’.

Moving forward, it is recommended that CBG continues to engage with SMB and the Government to strengthen the existing collaborative working relationship such that it can maximize its influence on SMB's E&S performance within the CBG concession. Also, CBG needs to keep Lenders informed about the management of E&S matters, preferably via provision of written inspection reports produced by CBG or the Bureau Guinéen d'Études et d'Évaluation Environnementale (BGEEE).

CBG's responsibilities in relation to the SMB rail project, insofar as they are specified in the CTA, should also be clarified.

Post audit note: Lenders and the IESC were provided with a copy of the 'Protocole d' Accord' on 14th August. The Protocol includes details regarding applicable standards and mitigation measures, the detail of which will be subject to further IESC consideration outside of this report¹¹. The IESC is aware of ongoing efforts to collaborate with SMB, including frequent HSE inspections undertaken by the CBG HSEC Department.

¹¹ The protocol is currently only available in French language. The IESC will further consider the content of the protocol following receipt of an official English translation.

Table 5-1: Summary of Findings, PS1

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance
July 2019_001	HSEC Resources	The HSEC team has been missing two key positions since January 2019: <ul style="list-style-type: none"> • HSEC Manager; and • Resettlement Manager. 	Operations	As a priority CBG must continue its efforts to secure suitable candidates for these managerial positions. <i>Post visit note: IESC understands offers have been made for both positions.</i>	Moderate (increasing to High if positions remain unfilled)
July 2019_002	HSE performance – falling rocks	Loose stones/rocks on mezzanine floors, stair wells and other accessible areas appeared to have fallen from height, probably during unloading of wagons by the tippler, and would therefore have been capable of causing serious injury.	Operations	CBG should investigate the source of the rocks. If these are found to have fallen from height, measures need to be put in place to prevent further falls and restrict access to dangerous areas where rocks might fall.	High
July 2019_003	HSE performance - Diving fatality	A detailed incident report following the death of a diver in CBG's port recommended a number of actions to minimise the risk of diving incidents.	Construction and Operations	All recommendations made within the incident report should be fully implemented, including the appointment of a professional diving firm for any future diving activity and procurement of a suitable aqua drone to reduce the need to use divers.	Minor
July 2019_004	Security management	The HSEC briefing given to the IESC and Lenders did not include information about site evacuation in case of a major security issue.	All	CBG should strengthen its induction procedure(s) to ensure visitors are aware of the procedure to follow in case of a site evacuation.	Moderate
July 2019_005	E&S Management Plans	Implementation of tasks specified in Actions Plans (embedded within Management Plans) is behind the schedule for a significant number of actions.	Operations	Timeframes specified in the Action Plans should be revised. Lenders must be informed in accordance with the Management of Change Procedure.	Moderate
July 2019_006	Plateau-by-plateau approach	During the July 2019 visit the IESC was informed that the plateau-by-plateau reference document was undergoing review by senior discipline leads.	Operations	The reference document should be finalised a matter of priority.	Moderate

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance
		To date CBG has not performed modelling studies in support of the plateau-by-plateau approach.		Any decision not to perform environmental modelling in support of the plateau-by-plateau approach needs to be justified and agreed with Lenders.	
July 2019_007	Community Relations (CR) Department staffing	Arising from the IESC's July 2019 monitoring visit, it is clear that a significant proportion of CR team time and resources are devoted to non-core activities and that several key core activities, stakeholder engagement; community grievance management and community investment projects are not receiving the necessary attention.	All	CBG (preferably HSEC Director if in place) to review the staffing situation, irrespective of whether the planned addition of two new staff members in 2019 occurs, in the context of the expected role/workload for the CR team and the role and size of similar departments in other mining companies in Guinea and other west African countries (benchmarking). Should the review indicate a need for additional staff then, CBG to prepare a time-bound recruitment plan to achieve the required complement of staff and that such recruitment be accepted by CBG senior management and be included in the HSEC budget for the next financial year.	High
July 2019_008	Stakeholder Engagement Plan (SEP)	The SEP is time-bound (with an 'end' date of September 2017); however, as an interim measure, CBG has prepared two Action Plans for 2017 to end 2018, and for 2019.	All	CBG to update and re-issue the SEP as soon as possible.	Moderate
July 2019_009	Community grievances	There is a lack of clarity in the recording of some grievances and community requests for assistance (<i>doléances et préoccupations</i>) and their descriptions differ according to the format. Although these formats are designed to present data in specific contexts, this variation increases the likelihood of errors occurring.	All	CBG to increase supervision of recording and tracking of grievances and community requests for assistance to ensure that the recorded data in the respective registers are accurate and consistent over time.	Moderate

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance
July 2019_010	Emergency Response Plan	Periodic emergency response exercises are a key component of the ERP. Emergency exercises should reflect the changing nature of the Project's risk profile.	Operations	CBG should consider an emergency exercise that includes the medical evacuation of personnel from within the crusher pit, for example, evacuation of an unconscious casualty from a mid-level platform.	Minor
July 2019_011	SMB railway	SMB has received permission, from the Government to initiate certain early works, relating to the proposed railway through the southeast corner of CBG's South Cogon concession.	Operations	CBG should continue to engage with SMB and the Government to strengthen the existing collaborative working relationship such that it can maximize its influence on SMB's E&S performance within the CBG concession. Also, CBG needs to keep Lenders informed about the management of E&S matters, preferably via provision of written inspection reports produced by CBG or the Bureau Guinéen d'Études et d'Évaluation Environnementale. CBG's responsibilities in relation to the SMB rail project, insofar as they are specified in the CTA, should also be clarified.	NA

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.

6.2 Employment and Employees

A meeting was held with the 'deputy' Human Resources (HR) Director and a senior colleague (the HR Director was on holiday). The IESC asked about for an update on progress on preparing and disseminating the HR Policy and HR Manual (latter provided to the IESC and Policy Lenders at the end of June 2019) and, also, on the status of the Retrenchment Procedure. Both were unable to provide the detailed update requested although they were aware of the 'big picture' in terms of these documents. *[Post-meeting Note: Soon after the monitoring visit, the IESC was contacted by the HR Director and this communication continues. Subsequently, the Policy Lenders and the IESC reviewed the HR Manual and provide comments to CBG]. The IESC was informed that work was underway to update and re-issue the Code of Conduct and the Code of Ethics.*

Given the scope and focus of the HR Policy and HR Manual (CBG employees, contracted workers and supplier workforces), there was a discussion on CBG's management of contractors/sub-contractors and suppliers in terms of enforcing labour and working conditions (LWC) requirements. It became clear that a broadly passive management approach was still in place (see also Section 6.3). The IESC realizes that only six months has elapsed since the approval of the suite of E&S management plans (end January 2019); however, it appears that the LWC requirements presented in the Contractor Management Plan have not yet been integrated, fully, into the HR Department's functional responsibilities and with it a more active approach to cascading LWC requirements and enhanced oversight action such as regular audits and improved reporting from contractors/sub-contractors and suppliers. It is recommended that, once the HR Manual is in place, that the HR Director prepares a brief implementation action plan to ensure that the Department will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This action plan to include capacity-building for key staff and, as necessary, revision to existing functional responsibilities.

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 July 2019 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 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

During the November 2019 monitoring visit, the operation of a workers' grievance mechanism was investigated during a meeting with the (then) The Fluor Industrial Relations Manager. At that time, Fluor was a key contractor for the Expansion Project Phase 1. The investigation identified some weaknesses in the operation of Worker Grievance Mechanisms at the sub-contractor level.

The current versions of the CBG HR Policy and HR Manual both refer to a workers' grievance mechanism. During the July 2019 monitoring site visit, an interview was held with a Sogea Satom senior manager and the HR Manager. Sogea Satom is a contractor for the MUA Project and is managing three sub-contractors, for example the sub-contractor 'ETF'. During the meeting, the IESC was informed that Sogea Satom recognized one workers' union. When asked if there was a written workers' grievance mechanism in place, it was stated that workers' grievances often were collective in nature and that the union had a key role in transmitting grievances to management and, also, in trying to resolve them. However, the procedure was informal as the approach taken was, essentially, to apply the relevant parts of the Labour Code. There were no checks on sub-contractors in terms of availability of a workers' grievance mechanism.

When in the field, the IESC specialist took the opportunity to speak to workers encountered at two work sites, in Kolaboui and Kamsar respectively. Workers met were from Sogea Satom and ETF (a sub-contractor). All workers stated that they had no knowledge of a union (and the identity of their union representative), or that this union was able to assist them if that had a grievance. Workers did not know the way by which a grievance could be submitted.

Although not conclusive, this anecdotal evidence is indicative that contractors and sub-contractors were not aware of their obligation to manage worker grievances. As a result, workers had not been adequately informed about their right to submit a grievance and for submitted grievances to be considered and a decision made, which would be relayed back to them, under a company 'owned' procedure. As mentioned above, the IESC is aware that CBG is currently working on the final stages of preparing and disseminating the HR Policy and HR Manual and is in the early stages of the process of aligning contractor compliance with the emerging set of updated/revised HR documentation and within the context of its Contractor Management Plan. It is understood that CBG will be rolling-out an internal PS2-compliant workers' grievance mechanism soon and this will be cascaded to contractors. The IESC will verify disclosure of the workers' grievance mechanism and review its operational performance during the next IESC monitoring visit.

It is recommended that CBG requires all its contractors, with immediate effect, to reinforce the message to both its own staff, and to sub-contractors, that there is CBG operates procedure whereby workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.

6.5 Occupational health and safety

6.5.1 Expansion Project

See Section 5.3, HSE Performance.

6.5.2 Demobilisation of workers

During the July 2019 monitoring site visit, a brief meeting with the Deputy Director of the Expansion Project occurred. He had prepared a demobilisation plan for Phase 1 of the Expansion project which indicated that demobilisation would be completed by December 2019. This plan envisages that some workers would transfer to Phase 2. He stated that CBG was committed to ensuring that all contractors would manage the demobilisation process (including final payments of salaries and any

end of contract bonuses/allowances) according to the national law. This was not being overseen by HR Department, but rather by the Expansion Project staff.

6.5.3 Workers' payments

CBG's HR Department does not monitor or audit payment of workers by contractors/sub-contractors as a matter of routine. CBG only knows of problems when complaints are made by workers (and these may take some time to reach CBG). Such complaints are not always formal in the sense that they are processed via the appropriate procedural channels. CBG does not check payslips: reason given cited sensitivities on the part of workers to such a practice).

During the meeting with Sogea Satom (see above), it was confirmed that there were no issues of late payments of workers, for example, due to cash flow difficulties, and that all demobilised workers were given a certificate of employment to assist them find another job.

Table 6-1: Summary of Findings, PS2

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
July 2019_012	Contractor/Sub-contractor labour and working conditions (LWC) management	CBG only applies, currently, a passive management approach to LWC management of contractors and sub-contractors.	All	Once the HR Manual is in place, the HR Director to prepare a brief implementation action plan to ensure that CBG will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This action plan to include capacity-building for key staff and, as necessary, revision to existing functional responsibilities.	Moderate
July 2019_013	Workers' Grievance Mechanism	MUA workers met at two MUA work sites in Kolaboui and Kamsar stated that they had no knowledge of a workers' union (and the identity of their union representative), or that this union was able to assist them if that had a grievance. Workers did not know the way by which a grievance could be submitted.	All	CBG to require all its contractors, with immediate effect, to reinforce the message to both their own staff, and to sub-contractors, that CBG operates a procedure whereby workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.	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;
- Waste management;
- Air quality;
- Noise; and
- Environmental monitoring.

These are discussed in turn below along with a short section describing observations on monitoring for the MUA Project.

7.2 Water management

7.2.1 Sangarédi Waste Water Treatment

Ramboll has reported in successive monitoring reports that CBG is aware of the need to maintain and upgrade the Sangarédi wastewater treatment plant (WWTP), but also noted a lack of actions up until the end of 2018. With the finalisation of the Water Management Plan (WMP) in January 2019, there is a clear set of actions and timeframes to which CBG is committed.

The WMP requires several actions including:

- Upgrade of pumping stations;
- Emptying the primary sludge tank;
- Installation of a tertiary UV treatment plant; and
- Training of staff to operate the plant.

During the December 2018 site visit, the IESC reported little progress at the WWTP except for vegetation clearance in the recirculating filtration beds. The facility was revisited in July 2019 and again there was limited progress evident at the site. Whilst on site, maintenance was seen to be ongoing in one area and this was explained to be standard ongoing maintenance rather than to address any specific issues. During previous reviews by the IESC, it had been raised that an additional (tertiary) treatment process should be added and CBG had committed to the inclusion of a UV filter to the site. However, the IESC was informed that the UV treatment plant, a critical component of the WWTP needed to reduce faecal coliforms downstream of the facility, had been purchased and was in Kamsar awaiting transportation and installation. The proposed location for the UV treatment plant was shown to the IESC (Appendix 4, Photo 17). No firm commitment was made on the timescales for its installation, although the IESC was informed post site visit that a budget for installation has been allocated.

Other tasks completed include, *inter alia*: removal of obstructions to allow equal flow of effluent to the 12 mixing and dosing tanks; sealing of the polishing ponds (previously not operational); and establishment of a monitoring register. Various other tasks specified in the WMP are ongoing.

Whereas this is behind the schedule outlined in the WMP, it nevertheless demonstrates that significant progress is being made at the Sangarédi WWTP.

7.2.2 Oil/water separator

The IESC has previously reported problems with the oil water separator adjacent to the tank farm in Kamsar. CBG is fully aware that the effluent from this facility exceeds applicable standards for hydrocarbon content and has undertaken several repair and maintenance interventions (as reported previously). The interventions, for example, repair of a floating oil skimmer used to remove bulk oil in the oil water settling tank (equalisation tank), have shown some improvements but exceedances persist. The ongoing problem with the oil/water separator is seen as a priority by CBG and the issue is frequently discussed during senior management meetings.

The new (since January 2019) Environment Team Leader has a background in industrial wastewater treatment and is currently looking into the separator's performance. Two firm actions are currently underway as follows:

- 1) Reduction of oil at source - Investigation into the sources of oil which will be followed by efforts to reduce oil at source. The IESC previously reported the use of a surfactant (Finasol) which significantly reduces the efficiency of the oil water separator plant. The use of Finasol has ceased, however further investigation will be undertaken by CBG to ensure this/other surfactant/s are not in use elsewhere across the site; and
- 2) The manufacturer of the plant (ASC Machinery) has a representative on site investigating the problem and looking at options that will result in compliance with effluent quality standards.

The IESC has been provided with study findings produced by the manufacturer of the plant. ASC Machinery has made several recommendations to improve the efficiency of the plant including additional equipment.

In addition to recommendations proposed by ASC machinery, the Environment Team Leader is also considering the use of Dissolved Air Flotation. The technique is widely used in oil refineries/other industries and is a proven technology. CBG is currently considering the various options to determine which will produce the best results.

The Environment Team Leader's technical background and CBG's proposed way forward is encouraging. However, effective management of effluent from this oil water separator has been problematic since the IESC's engagement. Current plans must translate into firm actions as a priority. The IESC recommends CBG periodically reports progress to the Lenders in this respect, starting with confirmation of the preferred solution following consideration of available options.

7.3 Waste management

7.3.1 Kamsar (Tora Bora)

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. The Tora Bora site was revisited in July 2019 and significant progress noted, including:

- Construction of waste reception slab (Appendix 4, Photo 4);
- Construction of a concrete slab and drainage for the bioremediation area;
- Site drainage; and
- Installation of incinerators (Appendix 4, Photo 3).

At the time of the visit the incinerators were in place and undergoing small-scale testing (see section 7.4, Air Quality). The establishment of the Tora Bora waste facility will result in a significant improvement in the management of CBG's wastes and is thus pleasing to see progress being made. Effort to complete and commission the site should be a priority noting the presence

of waste stockpiles and that the construction is behind the schedule outlined in the Waste Management Plan (see Section 5.5, Environmental and Social Management Plans).

7.3.2 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 and December 2018 site visit reports and several findings requiring corrective actions identified.

In July 2019, the area was still being used for temporary storage of wastes however several improvements were noticed:

- Overall volumes of waste had reduced;
- Large waste metal items had been removed (for recycling);
- Partially-filled oil drums were no longer evident and
- Open drums of oil were no longer evident.

Other temporary waste storage areas

As reported previously, several areas are being used to store hazardous and non-hazardous wastes across the Kamsar site (see December 2018 site visit report). Much of the stored waste is considered by CBG to be temporary pending commissioning of the Tora Bora waste facility. The IESC concurs with this view for many waste streams, but also notes certain wastes, such as scrap metals, can be recycled without dependency on the Tora Bora facility. Waste oil has been stockpiled over several months for use in the dryers during the wet season (when additional fuel is required to dry wet bauxite). With the onset of the wet season (around the time of the IESC's visit) the stockpiles are expected to diminish. However, if they are not required for fuel, alternative disposal solutions must be sought to avoid long-term storage of oils in non-bunded areas.

7.3.3 Waste management - Sangarédi

The landfill facility at Sangarédi 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 Sangarédi landfill during its July 2019 visit.

Ramboll visited the existing Sangarédi waste site to review its current status and be briefed on the proposed works to construct a full waste and recycling centre on the site, to replace the current unsegregated processes. The new facility will have controlled access and extend to 8 ha and include an incinerator for the non-recyclable material. Groundwater monitoring of the site is ongoing and will continue at an increased number of locations during construction and operation.

Further discussion with the Environment team, confirmed that a team member has been nominated to progress development works at Sangarédi landfill; however, implementation of specific actions is well behind the original timeframes indicated in the Action Plan (embedded within the Plan). Of particular note, the budget for proposed works had not been approved at the time of the site visit, possibly because the engineering plan/various tenders have not been prepared and therefore costs remain unclear.

Post visit note: The IESC has been informed that budgets have been approved at the time of report issue. The IESC will confirm its understanding during the next site visit.

The IESC believed the original timeframes specified in the Plan were likely to prove to be overly ambitious, particularly as the Plan was approved later than anticipated. CBG should revisit the timeframes for upgrade of the Sangarédi waste facility and update the Action Plan accordingly.

7.3.4 Recycling

The IESC understands there is an established recycling committee within CBG that, to date, has not included a representative from the HSEC team. The HSEC team wishes to appoint a representative join the recycling committee: the IESC would strongly support this measure.

7.4 Air quality

7.4.1 Air Quality Management Plan

An extended timeframe for the finalisation of this Plan was agreed between CBG and Policy Lenders to allow for additional stack emissions monitoring data to be collected, and, in particular, stack emissions data from the current stack and new Expansion Project dryer stack. The stack emission data will provide current emission data, including particulate matter, and depending on the results of the monitoring data, will be used to inform the design and installation of abatement equipment, if required. The Plan must be finalised by the end of 2019 and is the subject of a waiver agreement between CBG and the Lenders. In the period between January 2019 and the end of 2019, the draft Plan (excluding stack emissions data) is being used as an interim Plan.

7.4.2 Stack monitoring

CBG intends to undertake a monitoring programme that will determine emissions over several 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. CBG has commissioned SGS to perform the stack monitoring during three campaigns of emissions monitoring as follows:

Phase 1:

- Bauxite Dryers 1,2, and 3 (PM, metals, O₂, CO, CO₂, NO, NO_x, SO₂);
- Steam Boiler (PM, PM₁₀, PM_{2.5}, metals, O₂, CO, CO₂, NO, NO_x, SO₂); and
- Power generating units in Kamsar (O₂, CO, CO₂, NO, NO_x, SO₂).

Phase 2

- Bauxite Dryers 1,2, and 3 (PM, metals, O₂, CO, CO₂, NO, NO_x, SO₂); and
- Power generating units in Sangarédi (O₂, CO, CO₂, NO, NO_x, SO₂).

Phase 3

- Bauxite Dryers 1,2,3 **and 4** (PM, PM₁₀, PM_{2.5}, metals, O₂, CO, CO₂, NO, NO_x, SO₂)

The phase 1 sampling campaign was performed during the period 18th February to 2nd April 2019 (a period of 43 days). The second phase was scheduled for the end of July and the third in September 2019 (during the rainy season), however since the site visit, the second and third campaigns have been combined into one single rainy season campaign to be carried out in November 2019.

Several lessons were learnt during the first sampling campaign: firstly, Dryer 1 and 3 off-gas ducts partially blocked with accumulated wet bauxite sludge making flow speeds (and therefore dust concentrations) difficult to measure accurately and, secondly, the sampling probe used was too short to achieve representative sampling at the Dryer 2 sampling location. The IESC also understands that sampling conditions were not fully representative of normal operating conditions because dryer 2 was undergoing maintenance and, during certain tests, bauxite feed

rates and the volume of fuel burner were low whilst water injection rates (for the scrubbers) were high.

At the time of the site visit, two further sampling campaigns were envisaged in 2019 (later a single combined campaign during the rainy season). For subsequent campaign(s) the following is recommended:

- Sampling ducts must be free of dust/obstructions prior to the start of the sampling campaign;
- Sampling probes must be of the correct length to ensure representative sampling;
- Operating parameters must be representative of normal operating conditions, including normal variability (changes in fuel volume/fuel type/water use); and
- Operating parameters must be accurately recorded during sampling, for example, the volume of bauxite dried, volume and composition of fuel burnt (e.g. low sulphur fuel versus waste oil with higher sulphur content) and volume of water injected via the scrubbers. Also, sampling relative to the maintenance schedule of scrubbers should be known (on the basis that IESC has anecdotal evidence to suggest emissions of particulates decrease following maintenance of wet scrubber nozzles).

Future sampling campaign(s) provide an opportunity to apply these recommendations.

7.4.3 Finalisation of the Air Quality Management Plan

As indicated above, firm timeframes for the completion of the Plan are specified in a waiver. The Plan will need to include, to the extent necessary, proposed abatement measures to reduce stack emissions to acceptable levels. These measures can only be defined following completion of the sampling programme in September and the subsequent reporting and analysis of monitoring results. The IESC is aware that CBG did not receive the phase 1 monitoring report until several months after the sampling took place. CBG will need to manage the monitoring contractor closely and ensure that reporting timeframes are shortened for the phase 2 and 3 sampling campaigns if the deadline for finalisation of the Plan is to be met.

7.5 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.

At the time of writing this report CBG has only 1 surface miner which is currently awaiting repair. The IESC was further informed that there is currently no plan or budget agreed to purchase additional surface miners.

The IESC's earlier recommendation, that 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, therefore remains applicable.

7.6 Environmental monitoring

Monitoring is being conducted in accordance with CBG's Environmental Monitoring Plan under the supervision of the Environment Team Leader.

7.6.1 Air quality monitoring

CBG operates a fixed air quality monitoring station in Kamsar which continuously measures several parameters including oxides of nitrogen, particulate matter and SO₂. The station is sophisticated; however, it does require careful operation and maintenance. During the July site visit the IESC was informed of several problems including malfunctioning of PM_{2.5} and PM₁₀ measurements and dubious results for NO_x and SO₂. Several corrective actions have been put in place to improve the performance of the fixed monitoring station. Additionally, CBG is considering improvements to its air quality monitoring approach, including the use of new portable analysers for dust fall and gaseous pollutants and increasing the number of monitoring locations. Both initiatives to improve monitoring data are supported by the IESC, however any final decision should be subject to a MoC request and lenders notified accordingly.

The use of mobile sampling instruments will also facilitate air quality monitoring in the vicinity of the newly-installed incinerators at Tora Bora.

7.6.2 Noise and vibration

CBG has reported the procurement of a new vibration analyser and the planned procurement of two noise meters (to replace malfunctioning meters). The environmental monitoring team is planning to increase its noise and vibration monitoring programme, particularly in proximity to the railway line. CBG's plans are in line with recommendations made by the IESC in respect of increased monitoring/collection of baseline data for the railway in recognition of a future increase in the number of trains per day as the railway is used by other mining companies.

7.6.3 Environmental monitoring for the MUA Project

CBG has commissioned an international environmental consultancy (Englobe) to support the E&S management of the MUA Project. The consultancy's scope includes environmental monitoring; however, the level of equipment and resource is unlikely to match that of CBG's. As indicated above, the CBG environmental monitoring team will support the MUA Project through provision of its noise and vibration monitoring, and more broadly, with other environmental monitoring. The procurement of mobile air quality analysers will be particularly important for monitoring the MUA Project.

Table 7-1: Summary of Findings (PS3)

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
July 2019_014	Oil water separator discharge	Oil concentrations downstream of the oil water separator continue to breach Project Standards.	Operations	CBG should confirm its preferred solution for upgrade of the oil water separator and action the upgrade as soon as possible. Progress in this regard should be reported periodically to Lenders.	Moderate
July 2019_015	Waste recycling	To date there has been no representative from the HSEC team participating in the recycling committee.	Operations	The HSEC is seeking representation from its team. The IESC strong supports this measure.	Minor
July 2019_016	Air quality – stack emissions monitoring	Technical problems were encountered during the phase 1 stack emission monitoring. Furthermore, operating conditions at the time of sampling were not fully representative of normal operating conditions.	Operations	During future stack monitoring campaigns <ul style="list-style-type: none"> • Sampling ducts must be free of dust/obstructions prior to the start of the sampling campaign; • Sampling probes must be of the correct length to ensure representative sampling; • Operating parameters must be representative of normal operating conditions, including normal variability (changes in fuel volume/fuel type/water use); and • Operating parameters, for example volume of bauxite dried, volume and composition (sulphur content) of fuel burnt and volume of water injected via the scrubbers must be accurately recorded during sampling. Also, sampling relative to the maintenance of scrubbers (clearing of water jet nozzles) should be known. 	High (high on the basis that validity of monitoring results is critical to the finalisation of the Air Quality Management Plan)
July 2019_017	Air quality – stack emissions reporting	There was a period of several months between phase 1 sampling and reporting. Similar long timeframes following Phase 2 and 3 sampling campaigns will jeopardise finalisation of the Air	Operations	CBG must ensure the company contracted to undertake stack monitoring is able to produce subsequent reports in a timely manner to ensure finalisation of the Air Quality Management Plan in accordance with timeframes specified in the waiver agreement. Such	High (high on the basis that this is critical to completion of the Air Quality

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
		Quality Management Plan before the end of 2019.		timeframes must allow time for IESC/Lender review of a draft AQMP prior to the end 2019 deadline.	Management Plan)

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 Malaria prevention programme

During the July 2019 monitoring visit, the IESC was informed that this programme had ceased and was being re-evaluated. This topic and the wider issue of implementation progress relating to the Community Health and Safety Management Plan will be investigated in the next IESC monitoring site visit.

8.2 Security

A meeting was held with the *Director de la Prevention* (responsible for Security issues). The IESC was informed that implementation of the Security Management Plan was progressing well with no significant problems. During the meeting a range of issues was discussed, and the key items are summarized below:

- In the early stages of the Expansion Project there had been some problems with fishermen in the vicinity of the port and the jetty works. Persuasion has been successful as the problem has reduced. CBG operates patrol vessels, but CBG has no powers of arrest or confiscation;
- Migrants trying to board vessels, also, had been an issue, but ships are now escorted, and searches occur and, again the problem has been reduced;
- CBG has a permanent detachment of 30 gendarmes to assist with security (under CBG control). Other gendarmes are available on call should they be needed (not under CBG control). Training of these gendarmes is required under the Protocol that govern their role. Private security providers also are trained;
- Guards try to avoid interactions/disputes with local people escalating into hostility and a potential conflict situation. The aim is to avoid conflict and to call CBG's CR team and/or local government/s to try to find solution via mediation. Only if this fails would there be an escalation of security provision to state forces; and
- Kamsar and Sangarédi pose different kinds of security threats. Kamsar, "occupies its own space" and its assets and staff are easier to protect. In the Sangarédi area, the mining concession consist of a mosaic of villages and mining activities and, similarly, in Sangarédi town there is no clearly demarcated CBG area. Thus, assets and staff are more difficult to protect in Sangarédi, compared to Kamsar.

Currently, Sogea Satom (one of the MUA Project contractors), employs three security providers. The guards are not formally trained. Most guards come from the local communities and are not armed and are not confrontational. This lack of training poses a risk to CBG. It is recommended that CBG reviews its supervision with respect to contractors and their hiring security providers to ensure that contractors' practice is aligned with CBG's own practice with respect to hiring and deployment of private security providers.

8.3 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 and this Plan is now being implemented.

Several footbridges have been removed (as part of the MUA Project), The IESC is aware that these will be replaced in due course, but has recommended, in the separate MUA report, that interim measures be put in place to assist local people to cross the railway in safety.

The railway continues to present a significant risk to community safety. The most recent fatality occurred in May 2019.

8.3.1 Telibofi village

In its November 2018 monitoring report, the IESC listed several findings regarding health and safety issues relating to the village of Telibofi and the railway line. At that time, CBG indicated that actions were being considered to reduce the health and safety risks. An update on progress with respect to these actions is provided in Section 9.2.2 below.

Table 8-1: Summary of Findings, PS4

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance
July 2019_018	Security provision by contractors	Currently, Sogea Satom (one of the MUA contractors), employs three security providers. The guards are not formally trained. Most guards come from the local communities and are not armed. This lack of training poses a risk to CBG.	All	CBG to review its supervision with respect to contractors and the hiring and deployment security providers to ensure that contractors' practice is aligned with CBG's own practice with respect to hiring and deployment of private security providers.	Minor

9. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

The following topics relating to PS5 are presented below:

- Hamdallaye and Fassaly Foutabhé RAP;
- Kankalaré RAP;
- Thiapikouré Plateau and future land access compensation actions;
- Livelihood restoration;
- Gender;
- Resettlement implementation capacity;
- Past compensation measures; and
- Grievance management.

9.1 Hamdallaye and Fassaly Foutabhé RAP

9.1.1 Hamdallaye resettlement site, housing, community facilities and services

Significant progress in the development of the Hamdallaye resettlement site was observed:

- The overall layout of houses (grouped by lineage) and community facilities is adequate. Community representatives in the Hamdallaye Resettlement Committee confirmed that they participated in the layout and were happy with the outcome;
- A few of the houses under construction were visited:
 - The quality of construction appears generally adequate;
 - The IESC commends the innovative construction techniques used (“hydroform” bricks) which reduce the need for reinforced pillars and concrete, are environmentally sound (no use of fuel wood), while remaining relatively simple and affordable; and
 - Resettlers moving from mud/straw houses to houses with metallic roofs often complain of the higher temperature in the more modern houses. While ceilings and ventilation have been provided, CBG should be aware that complaints may be received, and more ventilation may have to be provided;
- The design of toilets and showers has been finalised. This is often a neglected aspect in resettlement sites and results in sanitation deficiencies that can be detrimental to health and pose maintenance problems. Dry latrines (double ventilated pit) and showers (separate from the latrines and including an infiltration soak pit) are well designed. The quality of construction was also observed to be adequate. Training of users will be critical (including proper use of the two pits successively, not concurrently, no showering and no soap in the latrine, drying time, emptying of the pits, action to be taken when the soak pit clogs). Such training must involve school children that will use similar pit latrines provided at the school. CBG have confirmed that such training was planned;
- Six drilled wells with a hydro-pneumatic handpump (“Vergnet”) have been completed. They are adequately located throughout the resettlement site. Water should be tested for iron content and bacteria, and iron-removal devices should be provided, if necessary. [Post-visit Note: CBG has informed the IESC as follows, “*Water was tested and no iron content was found.*”] Training of the users is also critical to long-term sustainability (water users committee to be formed, cost recovery mechanism to be put in place, linkage to be established with the national pump maintenance system, including private repairmen (“*artisans-réparateurs*”) and certified spare parts dealers). CBG has indicated to the IESC that this is planned;

- With regards to the community facilities (school and health centre), staff need to be allocated by the responsible ministries (Education and Health respectively). Experience in Guinea suggests that this is often a slow process. While CBG has indicated that contacts had been established and commitments had been made, in a meeting, it is advised that CBG's senior management become involved in contacts at Ministerial to ensure that staff allocation occurs quickly. Another issue is that no housing is planned for such staff. It is recommended that simple houses ("*chambre-salon*") be provided, by CBG, for education and health staff. Both staff and accommodation needs to be in place prior to completion of the relocation process; and
- It is not planned to provide lighting systems to resettled households. While no commitment in this respect was made by CBG to the resettled community, it is observed that current practice in Guinea is to provide such systems (typically a solar panel, with one socket for phone charge and a few bulbs). It is expected that such a request will emerge from the resettled community and will have to be addressed by CBG.

9.1.2 Move and transition

The current pace of construction does not seem to allow all houses to be ready for the move in November 2019, as currently envisioned. Either the contractors need to mobilise more resource (but this may be detrimental to construction quality), or the move may have to be postponed. If the latter, implications to children schooling and the agricultural calendar need to be discussed with the community and mitigated if necessary.

CBG intends to pay a moving allowance in cash to each household. This is an adequate measure. However, the RAP does not appear to include any specific details on demolition/salvaging of structures in the current village, moving, and associated support and allowances. Experience shows that these aspects are of great sensitivity to communities and can cause anxiety. CBG is advised to devise a policy on these aspects well ahead of the move such that it can be extensively consulted upon with the resettled community, including with women, who will likely do most of the household work associated with the move. Such a policy could include the following measures:

- The move should be planned to occur in successive waves of one or several lineages at a time; the exact date of the move for each wave should be notified to the community at least four weeks in advance. It seems adequate to plan the move over a total duration of about three weeks, in three waves of three days each (with the remaining two days of each of the three weeks as a contingency);
- A moving allowance in cash should be paid some time before the move (ideally about two weeks); this moving allowance can be calculated either on a per household basis, or on a per individual basis; as a reference, Guinea Alumina Corporation, a neighbouring bauxite mining operation, pays USD 200 per household, which has been calculated to cover the hire of a tricycle and two labourers for several days;
- On top of this allowance, specific transport assistance should be provided to identified vulnerable households; this should include the provision of transportation, assistance to demolition and salvaging, and possibly medical assistance should some people be in a medical condition that may be exacerbated by moving; and

A defined period (for example, 30 days from the official date of move) should be allocated (and disclosed) to the community for salvaging of their construction materials, with the demolition taking place shortly thereafter. Demolition should preferably be undertaken by community workers specifically hired for that purpose, with health and safety supervision (key information on the activities to occur in this period, and timelines, to be disclosed to community members). CBG intends to provide a transition allowance to physically displaced households, which is meant to compensate for the inability of resettled households to farm for a certain period and mitigate any risks of food

insecurity. However, this transition allowance appears not to have been logically planned at this point. To meet its purpose the transition allowance should be based on a detailed analysis of the ability (or inability) of affected people to harvest their crops in the old and new sites, which remains to be done and should take consideration of the actual date of the move vis-à-vis dates of harvests (actual at old site and potential at new site). Also, a combination of food (e.g. rice and oil) and cash could be a more effective (and more gender sensitive) way to serve this transition allowance than cash only.

Lastly the exit strategy from implementation of a transition allowance should be stated upfront (how long it will last).

9.1.3 Hamdallaye livelihood restoration

Gardens at the resettlement site

While relatively large plots have been provided to each lineage at the resettlement site so that they can plant trees and gardens for livelihood restoration purposes, the current characteristics of the soil at the new village are not conducive to agricultural use: it is lateritic with no organic matter, and large parts of the site have outcrops of hard cap that are very difficult to prepare for crop production. It is recommended that CBG retain an experienced land reinstatement specialist and/or agronomist to review soil characteristics at the site, prior to any relocation occurring, to determine what measures could be taken to make the soil cultivable. Trees (mainly fruit trees) are currently being planted with varying success. This will have to be monitored. Trees planted in public spaces have lower chances of success as no-one is responsible for their care. A solution to this issue should be discussed with the Resettlement Committee (for example, allocate the responsibility of every public tree to one clearly identified school child living nearby).

Land for land

A large 56-hectare parcel near within the Hamdallaye resettlement site has been earmarked for land-for-land allocation. However, this land appears not properly prepared at this point and its agricultural potential in its current condition is probably insufficient in terms of making a material contribution to livelihood restoration. Recontouring is not fully adequate (or fully complete) and topsoil has either not been put in place or is of inadequate quality. Also, CBG has commissioned a soil suitability study. Should the study results confirm the IESC's prognosis, then this is a threat to achieving livelihood restoration success., Therefore, CBG will need to implement remedial measures which may include *inter alia* the following actions (1) seek inputs from restoration specialists in CBG's mining department, (2) improve the reinstatement of the land accordingly, then (3) carry out an additional soil analysis on the final soil profile, then (4) proceed with fertilisation (such as organic matter and mineral fertilisers), as necessary, based on the soil analysis results of the final soil profile.

Similarly, the 22-ha land plot meant for Income Generating Activities for Hamdallaye resettlers has also been prepared (clay layer plus topsoil) but again recontouring appears imperfect and some improvements are required.

Safe access to farming areas from Hamdallaye resettlement site

In regards to the 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, it was reported by CBG that since the last IESC visit, crossing points to be secured and access thereto had been identified and visited jointly by the CR and mining operation teams (a tentative map of these was shared with the IESC). Final internal validation is yet to be obtained. Once this is secured, consultation with the community will take place and routes/crossings to be secured will be finalised.

9.1.4 Fassaly Foutabhé

Commitments made to this economically-displaced community as part of the Hamdallaye RAP are in the process of being met, as follows:

- The pedestrian / motorcycle bridge meant to ease access to both parts of the settlement (including the piece of land earmarked for Income Generating Activities) is being built and is reportedly virtually complete). The community expressed concerns in relation to improper drainage of the road leading to the bridge, which they anticipate may cause quick deterioration of the road;
- The school is well advanced, and completion is expected shortly;
- The well has been drilled and is operational. The iron removal device is not in place though;
- The prayer room has been built; and
- Livelihood restoration activities have started, with an extensive consultation and sensitisation effort by CECI to define what activities would be undertaken for what households. Three activities were selected (small ruminants, poultry, market-gardening) and groups have been formed, but beyond this preliminary awareness and training, no tangible support has been provided yet.

9.2 Kankalaré haul road and Parawi-Koobi Plateau resettlement

9.2.1 Background

Mining of the Parawi-Koobi plateau results in some limited economic displacement, whilst the 6 km haul road to service the mining activities in the plateau entails physical displacement of a series of settlements referred to as Kankalaré hamlets. A RAP was prepared to address both displacement impacts following identification non-compliances, against PS5, of the compensation approach being applied by CBG (see IESC's February 2018 monitoring report). This RAP was reviewed by the IESC ahead of the July 2019 visit and a number of deficiencies were found, notably, livelihood restoration measures were missing. Thus, the RAP remains under review/revision.

9.2.2 Status

The Kankalaré hamlets were visited during this monitoring visit and no residents were found. Most have relocated to the communities they originally came from, mainly Telibofi and Parawi villages, and to Sangarédi. Houses have been built in both villages using compensation paid for the affected structures in Kankalaré. PAPs, the IESC spoke to, reported that compensation had been sufficient to build an adequate replacement residential structure (some were actually able to build two houses). The Kankalaré RAP envisions compensation to host communities of Telibofi and Parawi, however progress in delivering such compensation was found, in visits to both communities, to have been slow:

- Wells have been drilled but iron removal devices are yet to be procured and installed (as at other sites – see above Fassaly Foutabhé);
- The road to Parawi community is yet to be designed and built, while mining in the Parawi-Koobi plateau might soon restrict access to this village;
- The footbridge over the rail to provide safe access to Telibofi is not in place; and
- Telibofi community representatives, met by the IESC, again reported safety concerns in regards of increased rail traffic (the railtrack is very close to the settlement). This concern is noted in the November 2018 IESC monitoring report.

The November 2018 IESC monitoring report indicated that, during a discussion with women from one of the Kankalaré hamlets, it was stated that there was a non-government 'school' (*'écolo*

*communautaire*¹²), 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) and that this school had ceased operation. It appears in discussions held by the IESC during the July 2019 visit that the reason why the school's operation stopped was that teachers moved back to their original communities when Kankalaré hamlets had to be resettled. This school was located between the westernmost hamlet of Kankalaré and Telibofi and served not only Kankalaré but also other villages, including Telibofi, Niangaba, Kalinko 1 & 2 and possibly Parawi. None of these villages alone is likely to warrant a school according to Government school allocation rules. However, by grouping several of them together (for example, Telibofi, Niangaba, Kalinko 1 & 2), it could be possible that this group of communities can justify a school, which would mitigate this unanticipated adverse impact. It is recommended that CBG investigate this issue further (it is not mentioned in the current version of the Kankalaré RAP) and to address it with relevant representatives of the Ministry of Education (perhaps in conjunction with the staffing issue related to the 'new' Hamdallaye school – see above).

9.2.3 Livelihood restoration for Kankalaré residents

Currently, the Kankalaré RAP does not contain a livelihood restoration programme. When the IESC spoke to PAPs in Parawi and Telibofi, they stated that, in the main, they had been able to access agricultural land within their original communities. However, it is understood that Kankalaré functioned as a commercial place for these residents as being closer to the highway they found it easier to market their produce, including, but not limited to cashew nuts. This impact remains unmitigated unless a credible livelihood restoration programme is devised and implemented for Kankalaré residents on the same principles as those currently implemented for Hamdallaye and Fassaly Foutabhé. The IESC will monitor, in further visits, the preparation and implementation of livelihood restoration activities.

9.3 Thiapikouré Plateau and future land access and compensation actions

The IESC was informed that CBG is likely to begin mining of the Thiapikouré Plateau, which is not currently covered by a RAP or Livelihood Restoration Plan (LRP). At the time of the July 2019 visit, a detailed asset survey had been carried out, between 26 February and 26 March 2019, and associated compensation was planned to be paid in the second half of July 2019. The asset survey indicates that 156 persons are affected by economic displacement and that no physical displacement would be experienced. While livelihood data were also available (survey carried out within the same exercise as the asset survey), the CBG team had not been able to process these for lack of time.

The IESC recommends that this land access exercise action warrants preparation of an LRP (in the sense of IFC's PS5) rather than the application of the 'streamlined compensation approach' envisioned at this point by CBG. This also stresses the need for more clarity in the criteria under which the 'streamlined approach' can be applied. It is recommended to review and clarify these criteria to ensure compliance with IFC PS 5. For example, CBG should design a clear 'decision tree' which will enable clear decision-making regarding selection of the appropriate planning tool/s for further land access actions. Essentially, CBG needs to clarify criteria under which the 'streamlined compensation approach' is acceptable, agree these with IESC and Policy Lenders, and revise the Resettlement Policy Framework accordingly.

9.4 Livelihood restoration

CECI is the implementing partner for the livelihood restoration programme for both Hamdallaye and Fassaly Foutabhé villages. The previous IESC report had described the status of activities as of end 2018. It appears that activities are still in the planning and consultation stages and that no actual

¹² A common situation in Guinea, whereby communities that do not benefit from a government school organise themselves to build a structure and pay teachers.

support to livelihood restoration has started in the field. It was also learned from CECI that their current budget and contract does not cover such support at this point. While feasibility studies and consultation have generally been well planned and implemented, it is now critical that actual support activities are carried out in the field to avoid the PAP groups, which have selected a specific income-generating activity, losing momentum. An action plan should be prepared, and a proposal should be obtained from CECI for the required next phase of livelihood restoration work. It is also suggested to restrict the programme to well-proven activities (including, for example, small ruminants, poultry and market gardening) and to avoid more risky activities that do not fit well with the objectives of livelihood restoration, such as, for example, fish farming.

9.5 Gender and inclusiveness

The IESC attended a meeting of the Hamdallaye Resettlement Committee. It was observed that this committee included no females. This must be remediated as a matter of urgency. The lineage representation that has been selected as the *modus operandi* for this committee should not preclude proper representation of females (and youth).

It was also observed that the CBG did not necessarily insist on female presence in community meetings (even though there are females in the CBG team implementing resettlement actions). This situation is untenable and CBG needs to act to ensure that no meetings will proceed unless there is adequate representation of females.

Similarly, experience suggests that it is becoming increasingly essential to include youth. The team should seek youth participation in community meetings as well as in separate fora and address their expectations (particularly in terms of livelihood restoration and training).

9.6 Resettlement implementation capacity

There has been no Resettlement Manager since the previous one resigned in Q1, 2019. An experienced Guinean professional (Resettlement Co-ordinator) is currently acting as Resettlement Manager, with support from the CR Manager and her team. More generally, the resettlement and livelihood restoration teams (including both CBG and CECI) appear overstretched, as evidenced by slow progress of some components (livelihood restoration, safe access to agricultural areas in Démourou valley), whilst in addition protracted procurement of outsourced services does not help. CBG has reported that it is in the process of interviewing applicants for the position of Resettlement Manager. If this process is not successful, a change in approach might be advisable, whereby the current acting Resettlement Manager might retain his leadership while the team would be strengthened by a more junior manager and strategic advice would be sought from experienced consultants on a part-time basis, which might include *inter alia* a framework agreement with a local consultancy and/or remote or periodic in-county support from an international consultancy.

Information management is currently inadequate. The team are using Microsoft (MS) Excel to manage all data, from livelihood information to grievances and compensation administration. This is inefficient. A dedicated information management system is needed, preferably with an integration to GIS capability. Appropriate solutions are available from a few international providers, some of which have demonstrated experience in similar mining operations in Guinea. The purchase of such a solution must be considered as a matter of urgency. The time required for tailoring the system and associated training should not be underestimated.

It is noteworthy that with the expansion of mining in Guinea in the last few years, there is now adequate capacity in the local private sector to implement activities such as asset and livelihood surveys, GIS, and database support. CBG has already relied on such local partners for surveys and such outsourcing could usefully be considered for further work of this kind either on a case-by-case basis or through one or more framework agreements.

9.7 Past-compensation measures

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.*"

It was learned during the July 2019 visit, that CBG had retained a consultant to undertake the review agreed upon with Policy Lenders and the IESC. Once available, the associated report will be reviewed by the Policy Lenders/IESC.

9.8 Grievance management

The verification of grievance records as well as anecdotal evidence gathered in community meetings suggest that grievance management is generally adequate. However, two issues require correction in the IESC's view:

- Whilst PS5 mandates an impartial recourse mechanism as part of the grievance management process, there is no formal mediation or grievance recourse mechanism. It appears that there is/was usually some reliance on community mediation for grievances that could not be resolved upfront by CBG, but this process is/was not formalised. CBG should seek to establish a grievance recourse committee in order to meet PS5 requirements; and
- Grievances and requests related to community infrastructure have to be lodged to the Commune and may be 'filtered' by the Mayor as a result. This offers no guarantee that all grievances are/will be conveyed to CBG. While it is acceptable to associate the Mayor to the resolution of such grievances, they should be lodged with CBG first.

Table 9.1: Summary of Compliance Findings, PS5

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
July 2019_019	Hamdallaye resettlement - sanitation	Resettlers will not be used to the type of toilets and showers they are receiving as part of resettlement housing.	Operations / PS5	Organise training of residents (including women and children) on toilet and shower utilisation.	Moderate
July 2019_020	Hamdallaye resettlement - drinking water supply	Six drilled wells with a hydro-pneumatic handpump ("Vergnet") have been completed. No testing for iron content and bacteria has occurred.	Operations / PS5	Water should be tested for iron content and bacteria, and iron-removal devices should be provided, if necessary, prior to any relocation of households to the new village site. [Post-visit Note: CBG has informed the IESC as follows, "Water was tested and no iron content was found."]	Moderate
July 2019_021	Hamdallaye resettlement - drinking water supply	Training of users and linkage to existing maintenance are critical to long term sustainability of handpumps.	Operations / PS5	Form water users committee and establish linkage to be established with the national pump maintenance system, including private repairmen ("artisans-réparateurs") and certified spare parts dealers.	Moderate
July 2019_022	Hamdallaye resettlement - school and clinic	Experience in Guinea suggests that timely allocation of teachers and medical personnel to new schools and health facilities may be problematic.	Operations / PS5	Engage at high-level with the Ministries of Education and Health to facilitate timely allocation of staff to the Hamdallaye resettlement site school and clinic prior to completion of the relocation process.	Moderate
July 2019_023	Hamdallaye resettlement - school	Experience in Guinea suggests that where no housing is provided to teachers, they may not stay.	Operations / PS5	Ensure that houses are built for teachers at the Hamdallaye resettlement site prior to completion of the relocation process.	Moderate
July 2019_024	Hamdallaye resettlement - move	Current progress of construction at resettlement site may not allow to meet planned move period (November 2019).	Operations / PS5	Review progress of construction works at the resettlement site and implications to timing of the relocation.	Moderate
July 2019_025	Hamdallaye resettlement -	CBG's policy related to moving and transition support is not fully clear.	Operations / PS5	Devise a policy with regards to moving and transition support taking consideration of guidance in section 9.1.2:	Moderate

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
	move and transition			<ul style="list-style-type: none"> • The move should best be planned to occur in successive waves of one or several lineages at a time; the exact date of the move for each wave should be notified to the community at least four weeks in advance; in the case of Hamdallaye, it seems adequate to plan the move over a total duration of about three weeks, in three waves of three days each (with the remaining two days of each of the three weeks as a contingency); • A moving allowance in cash should be paid some time before the move (ideally about two weeks); this moving allowance can be calculated either on a per household basis, or on a per individual basis; as a reference, GAC, a neighbouring bauxite mining operation, pays USD 200 per household, which has been calculated to cover the hire of a tricycle and two labourers for several days; • On top of this allowance, specific transport assistance should be provided to identified vulnerable households; this should include the provision of transportation, assistance to demolition and salvaging, and possibly medical assistance should some people be in a medical condition that may be exacerbated by moving; and • A defined period (for example, e.g. 30 days from the official date of move) should be allocated to the community for salvaging of their construction materials, with the demolition taking place shortly thereafter. Demolition should preferably be 	

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
				undertaken by community workers specifically hired for that purpose, with health and safety supervision (key information on the activities to occur in this period, and timelines, to be disclosed to community members.	
July 2019_026	Hamdallaye resettlement – livelihood restoration	The plots envisaged for household gardens, the 56 ha land plot earmarked for land-for-land compensation and the 22 ha parcel meant for IGAs are not in a condition conducive to agriculture. Recontouring is not fully adequate (or fully complete) and topsoil has either not been put in place or is of inadequate quality. Also, CBG has commissioned a soil suitability study for the 56 ha plot. Should the study results confirm the IESC’s view on soil suitability then this is a threat to achieving livelihood restoration success.	Operations / PS5	Retain an experienced land reinstatement specialist and/or agronomist to review soil characteristics at all sites to determine what measures could be taken, prior to any relocation occurring, to make the soil cultivable. Trees (mainly fruit trees) are currently being planted with varying success. This will have to be monitored. Should the agronomists review and the soil suitability study results confirm the IESC’s view soil suitability for crop agriculture and shade trees, CBG to implement remedial measures which may include <i>inter alia</i> the following actions (1) seek inputs from restoration specialists in CBG’s mining department, (2) improve the reinstatement of the land accordingly, then (3) carry out an additional soil analysis on the final soil profile, then (4) proceed with fertilisation (such as organic matter and mineral fertilisers), as necessary, based on the soil analysis results of the final soil profile.	High
July 2019_027	Hamdallaye resettlement – Tree planting in public places (and shade)	Trees planted in public spaces have lower chances of success as no-one is responsible for their care.	Operations / PS5	A solution to this issue should be discussed with the Resettlement Committee (for example, allocate the responsibility of every public tree to one clearly identified school child living nearby).	Minor
July 2019_028	Kankalaré resettlement – RAP	The RAP does not include a livelihood restoration programme.	Operations / PS5	Devise a livelihood restoration programme for Kankalaré based on principles similar to those	High

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
				applied for Hamdallaye and amend the RAP accordingly.	
July 2019_029	Kankalaré resettlement – measures for host communities	Limited progress on measures meant to offset impacts to host communities of Kankalaré resettlement.	Operations / PS5	Expedite planning and implementation of these measures: a road to Parawi village and for Telebofi: provision of footbridge over the railway; erection of fencing along railway for the stretch where the railway passes beside the village; and iron-removal devices for wells.	High
July 2019_030	Forthcoming compensation (Thiapikouré plateau)	The Thiapikouré plateau, which is not currently covered by a RAP or LRP, will be mined in near future. Surveys have been carried out and compensation was about to be paid at the time of the July 2019 visit.	Operations / PS5	Prepare an LRP for economic displacement resulting from proposed mining on this plateau.	High
July 2019_031	Kankalaré resettlement – loss of community school	A community school ceased to exist after relocation of Kankalaré residents leaving children from a number of small settlements without a school to attend.	Operations / PS5	Investigate this issue further (it is not mentioned in the current version of the Kankalaré RAP) and address it with relevant representatives of the Ministry of Education (perhaps in conjunction with the staffing issue related to the 'new' Hamdallaye school – see above).	High
July 2019_032	Forthcoming compensation	Criteria for deciding on applicability of the 'streamlined compensation approach' or another resettlement planning tool are not clear.	Operations / PS5	Clarify criteria under which the 'streamlined compensation approach' is acceptable, agree these with IESC and Policy Lenders, and revise the Resettlement Policy Framework accordingly.	High
July 2019_033	Land access, compensation and resettlement – Implementation resources	The approach to information management is currently inadequate in view of the magnitude of current and future land access exercises.	Operations / PS5	Consider the purchase of a dedicated IT solution enabling survey management, compensation, stakeholder engagement, and grievances, desirably with a link to a GIS.	High

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
July 2019_034	Hamdallaye resettlement – Gender and inclusiveness aspects	The current composition of the Hamdallaye Resettlement Committee does not include women or youth.	Operations / PS5	Include women and youth in the Hamdallaye Resettlement Committee and, also, in other such Committees established in the future.	High
July 2019_035	All activities – Gender and inclusiveness aspects	The CBG team do not necessarily require presence of women and youth in community meetings.	Operations / PS5	Ensure that the presence of women and youth is required at all stakeholder engagement events.	High
July 2019_036	Resettlement – grievance management	Some grievances are reviewed by the Commune before they are lodged with CBG.	Operations / PS5	Grievances should be lodged first with CBG and then reviewed with the Commune.	Moderate
July 2019_037	Resettlement – grievance management	There is no formalised grievance recourse mechanism.	Operations / PS5	An impartial grievance recourse mechanism should be put in place and disclosed to resettlement-affected communities.	Moderate

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

10.1 Introduction

As in previous IESC site visits¹³ there were two key aims of the July 2019 site visit:

- to review and discuss the general status of the Biodiversity Management System (BMS) established in 2016 and to understand the progress made in the implementation of the BMS measures; and
- to visit various locations on site where biodiversity activities related to the BMS were ongoing or had occurred.

During the visit, the IESC biodiversity specialist also visited locations related to construction of the Multi-User Agreement Rail line doubling project. The findings of those visits have been reported separately and are only mentioned here if relevant to the wider CBG project.

10.2 Biodiversity management system

10.2.1 Current status

There are 216 actions listed on the BMS and Table 10.1 shows the progress made since implementation of the system in 2016 and including the introduction of new category of "disagree (removed)" which is explained in section 10.2.2.

Table 10.1: Summary of BMS Action Tracking

Status	July 2017 ¹⁴	February 2018	November 2018	July 2019 ¹⁵
Completed	14 (6.5%)	37 (17.1%)	135 (62.5%)	165 (77.5%)
In Progress	63 (29.2%)	152 (70.4%)	68 (31.5%)	37 (17.4%)
Late	48 (22.2%)	9 (4%)	8 (3.7%)	8 (3.8%)
Not Started	88 (40.7%)	16 (7.4%)	5 (2.3%)	3 (1.4%)
Disagree (Removed)	0 (0%)	0 (0%)	0 (0%)	4 (1.9%)
Total Actions	213	214	216	217

10.2.2 Review

As indicated previously by the IESC, CBG is currently undertaking a detailed review of the BMS actions. CBG's plan to update the BMS was discussed with both the IESC and the IFC biodiversity specialist. It was agreed that CBG will:

- Confirm completed actions;
- Mark ongoing actions for which a process been put in place as complete; and
- Identify those actions that CBG considers cannot or should not be addressed by its biodiversity team.

Following provision of the BMS to the IESC after the visit, it is clear that there is a discrepancy in the number of actions reported, with it increasing from 213-217 since the inception of the BMS. The

¹³ Undertaken during November 2018, February 2018, July 2017

¹⁴ Total Actions for July 2017 and February 2018 should equal 216.

¹⁵ It is unclear why there are now 217 actions listed.

IESC has not assessed this change in numbers as there do not appear to have been any actions omitted and considers it to be possible that actions have been subdivided during the process. The IESC suggests that this point be clarified during the review.

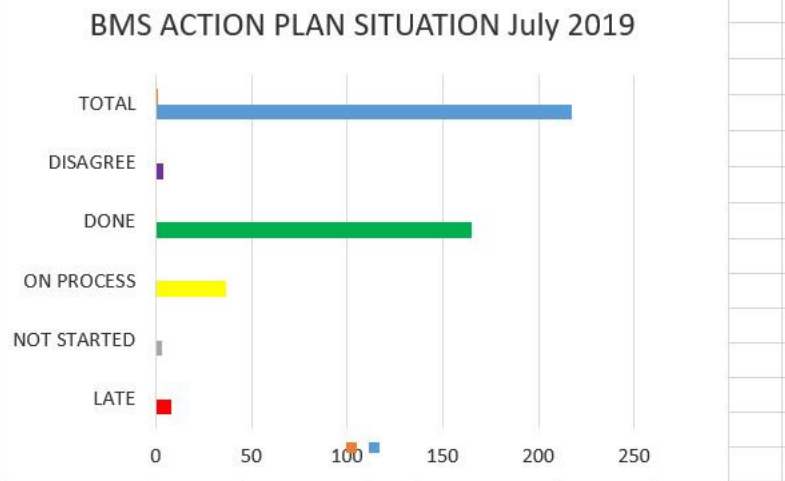
A breakdown of the BMS progress is shown in Table 10.2 with a breakdown by the three sections of the BMS:

- General Action Plan (GAP);
- Habitat Action Plan (HAP); and
- Species Action Plan (SAP).

Table 10.2: Biodiversity Management System – Biodiversity Action Plan Register (July 2019)

GAP			HAP			SAP		
LATE	2	2.0%	LATE	0	0.0%	LATE	6	8.5%
NOT STARTED	2	2.0%	NOT STARTED	0	0.0%	NOT STARTED	1	1.4%
ON PROCESS	9	9.0%	ON PROCESS	2	4.3%	ON PROCESS	26	36.6%
DONE	87	87.0%	DONE	40	87.0%	DONE	38	53.5%
DISAGREE	0	0.0%	DISAGREE	4	8.7%	DISAGREE	0	0.0%
TOTAL	100	100.0%	TOTAL	46	100.0%	TOTAL	71	100.0%

TOTAL BAP		
LATE	8	3.7%
NOT STARTED	3	1.4%
ON PROCESS	37	17.1%
DONE	165	76.0%
DISAGREE	4	1.8%
TOTAL	217	98.2%



10.2.3 Completed actions or actions removed from BMS

Overall, a completion rate of nearly 80% represents good progress by the CBG biodiversity team. However, considering the BMS in more detail, it is clear that progress in actions related to species is lower than for general or habitat actions. During the site visit, it was suggested to the CBG biodiversity team that there needs to be a prioritisation of outstanding actions as part of the BMS update. It was agreed during the site visit that the CBG biodiversity team will provide an updated BMS reflecting the changes discussed before the current Biodiversity Manager leaves his post so as to ensure that the new manager has an agreed and confirmed list of action to implement.

It was further agreed that CBG will provide a justification to the IESC and the lenders for the removal of any actions, e.g. actions that with hindsight are not possible to achieve or outwith the control of the biodiversity team. The Lender Group should be notified of any proposed changes to the BMS in accordance with the procedure and timeframes specified in CBG’s Management of Change procedure.

10.2.4 In progress actions

The IESC acknowledges that the CBG biodiversity team is not expected to have completed all actions within the elapsed period since it was enacted. Clear progress is being made with in progress actions reducing by over 50% between February 2018 and November 2018 and by nearly 50% between November 2018 and July 2019. That leaves 37 in progress actions overall, 26 of which fall within the SAP, i.e. they relate to species specific actions. However, during the meeting with the IESC and IFC biodiversity specialists, it was identified that many of those actions currently defined as being in progress might be more accurately considered to be completed. In the case of actions relating to the conservation and protection of species, at least eight actions were identified by the IESC and IFC biodiversity specialists for consideration for re-classification in this way, further emphasising the need for a thorough review of the BMS.

10.2.5 Late actions

Of key concern to the IESC are the actions identified as late in the BMS, namely:

- Action 66, relating to progress of rehabilitation of mined areas (essentially that rehabilitation keeps pace with new mining and reduces a historical backlog in the South Cogon area;
- Action 98, relating to the limiting of unnecessary lighting as far as possible; and
- Actions 197-201 inclusive, relating to freshwater fishes and impacts on critical habitat.

Action 66

The CBG biodiversity team detailed its proposals to address Action 66 with a five-year plan to restore between 150-250 ha per year until 2023. Compared to the approximately 1,600 ha restored by CBG since 1991, it is an ambitious target, but one greatly aided by the Plateau by Plateau (PbP) approach prescribed in the BMS and shown to the IESC in December 2018. There is intended to be 179 ha of restoration during 2019 and the CBG biodiversity team reported that restoration was on target.

During the visit, rehabilitated areas were visited to observe the tree planting trial plots being monitored by the CBG biodiversity team. Comparison plots, with or without topsoil and also some with fertiliser (chicken manure) are being monitored. A 98% success (survival) rate is being recorded in the fertilised plots with topsoil. Table 10.3 was provided by the CBG biodiversity team to demonstrate progress in planting of trees in three rehabilitation areas.

Table 10.3: Tree planting program

No	Sites	Holes dug	Still to dig	Planted	Still to plant	Areas finished	Species	Percent
1	N'Dangara	41 000	0	31 250	9 750	50	<i>Afzelia africana</i> , <i>Erytrophleum guineensis</i> , <i>Gmelina arborea</i>	76%
2	Silidara	9 277	22 098	3 091	28 284	5	<i>Afzelia africana</i> , <i>Khaya senegalensis</i> <i>Gmelina arborea</i>	10%
3	Bidikoum	11 000	28 562	3 172	36390	5,07	<i>Afzelia africana</i> , <i>Khaya senegalensis</i>	8%

	Total	61 277	50 660	37 513	74424	60,07		34%
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The PbP approach results in smaller areas¹⁶ of excavation on each plateau by focussing the mining activities away from key constraints and this leaves smaller area to be restored and allows the backlog to be addressed. Nevertheless, the action is considered to be late, and progress towards the reduction and ultimate elimination of the backlog will be closely monitoring during the 5-year period. Further details on the PbP approach are provided in subsequent sections.

Action 98

In discussion with the CBG biodiversity team, this was identified as an action now largely being addressed by the PbP approach, so that, where light sensitive receptors are present, the constraint is identified and mitigated. This is an example of an action recorded as being late, which might now be better described as being in progress.

Actions 197-201

The IESC considers that delays in completing these actions are of particular concern as they relate to potential impacts on freshwater habitats identified as being critical habitat for freshwater fish species. Furthermore, this issue has been identified as of key concern in previous monitoring reports and it is now imperative for CBG to demonstrate progress in this matter. Of the actions, the first three are of highest priority to be completed or replaced with acceptable actions as they are the measures by which CBG will be able to confirm the critical habitat status:

197. Knowledge of these species in the concession will be improved by specific fish studies at all locations where rare fishes have been found during the ESIA studies;
198. There must be confirmation of the identifications of certain species with significant range extensions during the 2013 ESIA field studies;
199. Following fieldwork in 2016-2017, a management and monitoring plan for these species will be produced.

In the absence of the specific fish studies to be completed under Actions 197 and 198, previous discussions have set out potential approaches to be considered by CBG with regard to using proxies for identifying critical habitat, e.g. watercourses with remaining gallery forest, thereby allowing progression to preparation of a management and monitoring plan as detailed in Action 199. This had been indicated during the November 2018 visit as the preferred CBG biodiversity team approach but has not been progressed. During the July 2019 discussions with the CBG biodiversity team, further suggestions were raised including environmental DNA studies, discussion with local fishermen, netting or electrofishing. It was agreed that the CBG biodiversity team would confirm the approach to be followed and undertake the work urgently.

10.3 Resources

10.3.1 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 2-year contract with a good handover period occurring between the new and old contracts. However, that new manager will be leaving the CBG biodiversity team in September 2019 and there is a need to find another manager quickly. Various options were said to

¹⁶ The IESC understands up to 30% less as a result of constraints mapping

be under consideration including potentially promoting one of the existing team to the role of manager.

10.3.2 Biodiversity team

The CBG biodiversity team working with the Biodiversity Manager continues to grow in experience and knowledge of the processes, systems and requirements of the Project. It appears that the wider project team holds the biodiversity team in high regard and trusts its advice, and the IESC saw evidence of recent recommendations on buffer zones to avoid higher value habitat having been implemented.

The CBG biodiversity team has sufficient resources to continue as at present. However, the IESC believes that the team would benefit from further investment to allow the team members access to training which would continue their growth. This is now particularly key with the current manager due to leave soon. It was confirmed to the CBG biodiversity team that IFC could potentially support such training needs if requested.

10.4 Biodiversity monitoring studies

During the visit, the CBG biodiversity team provided an update on the progress of a number of monitoring surveys including the additional biodiversity studies and monitoring baseline studies on chimpanzees *Pan troglodytes* and other primates, e.g. red colobus *Piliocolobus badius*, inventory and management plans for reptiles, amphibians, hippopotamuses *Hippopotamus amphibius* and monitoring of birds. Also, flora and vegetation studies at 30 botanical monitoring plots in the Boullère KBA. *Post visit note: the requested materials have since been received and are under review at the time of reporting.*

With particular regard to the concession wide chimpanzee study, the IESC biodiversity specialist advised that the CBG biodiversity team endeavours to work collaboratively with GAC for who the same third-party research body has completed the corresponding study of its concession. As raised previously by the IESC, a holistic understanding of how the population(s) of chimpanzees found within the Boullère KBA uses the whole area, regardless of concession boundary will be key to developing a successful on-site offset that delivers appropriate enhancement for the population(s) of chimpanzees found there.

10.5 Plateau-by-plateau approach

Further information was provided by the CBG biodiversity team on the PbP approach, previously presented to the IESC in November 2018. In addition, locations on site where the PbP approach has been followed were visited to allow the IESC and IFC biodiversity specialists to review its implementation on the ground. Since its implementation in 2018, the PbP approach has been refined and adapted based on the first assessments on the Thiapikouré and Koobi plateaus. The proposed approach is for the process to commence at least one year ahead of proposed mining works, allowing constraint mapping and identification of appropriate buffers, followed by in field data collection and verification ahead of approval of any land disturbance permits that will be accompanied by avoidance maps. The implementation of the mitigation/adherence to constraints buffers are monitored by the CBG biodiversity team.

It was reported that the process has full buy-in from the CBG mining department and management and has resulted in a reduction in costs by focussing mining operations and reducing the areas disturbed by operation and therefore requiring rehabilitation.

The visit took in an area on the Thiapikouré plateau where the route of a proposed new mine road had been altered following the PbP approach. More specifically, the road had been realigned to cross a watercourse at a location avoiding gallery forest, now dominated by oil palm *Elaeis guineensis*,

instead of the initially proposed route which would have disturbed a patch of remnant gallery forest. The IESC notes this as a good example where the PbP approach is reducing adverse impacts.

10.6 Kagnaka

The CBG Biodiversity team provided a response to concerns raised previously by the IESC in the report of the November 2018 visit about human-chimpanzee conflicts and interactions near Kagnaka, where both use a spring to get fresh water. During that visit it appeared that an inoperable pump on the edge of the village was the cause of locals continuing to visit the spring to collect water. However, it was made clear to the IESC that the pump was only briefly inoperable and that the women collecting water were actively choosing to continue to visit the spring instead for apparently social and tradition reasons. The CBG biodiversity team should monitor the situation, particularly as it may yield interesting information on chimpanzee-human interaction.

10.7 Community nurseries

The community nurseries previously reported on by the IESC were not revisited. However, the CBG biodiversity team was able to provide a positive update following the previous observations of the nurseries. Framework contracts for 3 years of support have been agreed for the sites and the propagation of trees and plants has resumed for use in restoration across the project site. The Key native species to be propagated include *Khaya senegalensis*, *Parkia biglobosa*, *Azelia africana*, *Parinari excelsa*, *Daniellia oliveri* and *Erythrophyllum suaveolens*. In addition, non-native fast-growing species including the tree species *Gmelina arborea* and sterile types of vetiver grass *Chrysopogon zizanioides* as both are being used extensively at the start of restoration to stabilise soils and provide conditions for native species to re-establish, either through replanting or natural colonisation.

10.8 Réseau Environnement Bauxite (REB)

As part of Action 50 of the BMS, in order to address potential cumulative impacts of mining in the Boké region, the CBG biodiversity team is taking an active lead in this cumulative working initiative which translates as the Bauxite Environmental Network. CBG is the current chair of REB and is working with GAC, COBAD and other neighbouring operators to agree consistent approaches on the protection and mitigation of impacts upon biodiversity. Key initiatives include a 10-year plan to monitor animal movements between the concessions of the various REB members, particularly chimpanzees. In addition, REB is working on a rehabilitation manual for mine restoration and on a programme of marine species monitoring.

10.9 COBAD road

Sections of the COBAD road, previously identified as requiring rehabilitation were visited to view the most recent rehabilitation and tree planting. The location within the Boullère KBA where the COBAD road crossed the river into the GAC concession was visited. As shown in previous monitoring reports, the road construction had cleared a swathe of trees and other vegetation leaving bare ground and subsequent erosion of sediment into the watercourse. It is likely that the road allowed and possibly induced access into the area of the KBA, with activities such as charcoal production threatening the mature forest of the KBA (Appendix 4, photo 22). *Gmelina arborea* has been used extensively in the rehabilitation of the area given its fast-growing properties and typical success in rehabilitation of such areas. The trees were still small at the time of the visit, however they all appeared to be thriving.

The trees should grow rapidly to cover the area allowing native plant species to colonise around them. Further along the COBAD road, older areas of *Gmelina arborea* and vetiver planting showed exactly that process having occurred.

The rehabilitation has been largely successful, however, the remaining width of road is still sufficient for a large vehicle to use it largely unimpeded. It was explained that local people did not want the road narrowed any further. The IESC suggests that the rehabilitation specialists should consult with local villages to reduce the road to little more than a path to be fully effective, particularly as evidence of charcoal production in the area was clear to see. Exceptions to this may be acceptable where particular needs necessitate, however the potential impacts upon biodiversity of such exceptions must be considered in detail, particularly where the impacts challenge the effectiveness of conservation efforts in the area, e.g. by increasing the complexity or costs. For example, there remains an apparent desire for the bridge between the GAC and CBG concessions to be repaired. This would allow further vehicle access and likely conflict with the restoration efforts and potentially result in impacts on biodiversity. The IESC suggests that there may be compromise positions, e.g. if the bridge were to be reinstated, it should only be reinstated as a footbridge.

10.10 SMB Railway

As described earlier in this report, a section of railway proposed by SMB has been given permission to pass through the south-eastern part of the CBG South Cogon concession. CBG has been working with SMB to try to ensure that all works follow similar approaches to those undertaken by CBG and, as far as possible, remain compliant with IFC PS6. Of particular concern is that the railway appears to follow a route where it will intersect with many areas of gallery forest, a key habitat type which CBG has endeavoured to protect throughout its concession. The IESC and IFC biodiversity specialists advised that CBG should undertake its own further monitoring in the area to ensure it understands fully the potential impacts.

10.11 Vultures – Sangarédi landfill

The IESC understands that monitoring of the vultures using the landfill has been completed on behalf of CBG. However, this report has not been provided as yet. The landfill site is proposed to be cleaned up and replaced with a modern facility. In its current state, at least 20 hooded vultures *Necrosyrtes monachus* were seen feeding on the waste, with up to 50 more roosting and loafing within the immediate area. A single white-backed vulture *Gyps africanus* was also recorded flying over Sangarédi during the site visit. Given the Critically Endangered (CR) status of those species, depending on the results of the monitoring study, there remains a requirement for CBG to develop an alternative feeding strategy for vultures, i.e. a vulture feeding station to replace the consistent food source that the current landfill provides.

10.12 Liaison with CBG Communities Team

The IESC noted a need for improved coordination between the CBG communities and CBG biodiversity team as each could provide useful information or support to the other. In particular, locations selected for proposed resettlements do not appear to consider potential biodiversity impacts and that the CBG biodiversity team has little involvement in the rehabilitation and planting of resettlement sites. Furthermore, replanting of trees would benefit from inputs from the CBG biodiversity team which is willing and able to help given its previously described successes in both tree survival and in reducing use of cashew as the main replanted species. As described in Section 10.9, there is a potential conflict on the COBAD road restoration between the consideration of biodiversity aspects and the requests/requirements of communities for the road to remain open. The PbP approach provides an opportunity to improve coordinated planning involving both CBG's communities and biodiversity team.

10.13 Damage to Mangroves

The IESC visited the site of previous damage to mangroves in the Kamsar port area which have been rehabilitated by planting with red mangrove *Rhizophora mangle* and white mangrove *Avicennia*

germinans. Mudskippers and crab species as well as three species of kingfisher were seen during the brief stop at the mangroves, indicating successful replanting and that natural colonisation by faunal species has been quick (less than 2 years).

Table 10.4: Summary of Findings, PS6

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
July 2019 _038	Biodiversity Management System	Review and Update of BMS.	PS6	CBG Biodiversity Team to complete review and update of BMS prior to current team manager leaving the role to work on the off-site offset. Additional deliverable required is a document justifying those actions now considered not to be relevant and/or undeliverable from the original BMS in order to inform the Management of Change Process.	Moderate
July 2019 _039	Freshwater Fish Critical Habitat	Actions 197-201 of the BMS remain uncompleted despite them relating to a critical habitat issue and the requirement for them needing to be progressed having been discussed repeatedly since 2017.	PS6	Whilst it is acknowledged that the PbP approach aims to avoid impacts on all watercourses, these actions must be enacted immediately to provide the IESC with confidence that they can and will be fully addressed.	High
July 2019 _040	Biodiversity Manager	The current Biodiversity Manager will leave his position in mid-September and a replacement is required.	PS6	It is important that a new manager is appointed in order to maintain the good work of the biodiversity team. It was suggested by CBG during the visit that no new external manager be hired and instead the lead member of the remaining biodiversity team be promoted into the role. The IESC is broadly supportive of this proposal but suggests that a level of external support/mentorship is sought.	Moderate
July 2019 _041	Completed Biodiversity Monitoring Studies	A number of studies required under the BMS for various species have been completed. However, a vulture study remains outstanding.	PS6	The vulture study should be provided to the IESC and Policy lenders for review. The IESC requests that the monitoring study reports be provided for review and comment as soon as possible. This includes the study of vultures at the Sangarédi landfill.	Low

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance
July 2019_042	Boullère KBA - Chimpanzee studies	Sylvatrop also completed a study of chimpanzees for GAC.	PS6	CBG should liaise with GAC to agree to work collaboratively on the subject of chimpanzees in the Boullère KBA as it is likely to be the same group of animals using both concession areas. (This recommendation mirrors recommendation Dec 2018_33 which had not been completed by July 2019).	Low
July 2019_043	Réseau Environnement Bauxite	CBG is taking an active role in the collaborative working group with other mining operators in the area.	PS6	CBG should continue to take an active role in the REB and where REB develops new documents regarding biodiversity, these should be shared with the IESC.	Low
July 2019_044	COBAD Road	CBG is actively restoring the COBAD road.	PS6	The restoration of the COBAD road completed to date is excellent and appears to be successful. However, the IESC suggests that in those locations where the remaining unrestored road is wide enough for vehicles to pass, these should be reduced to the width of a path, non-passable by vehicles. Exceptions to this may be acceptable where particular needs necessitate, however the potential impacts upon biodiversity of such exceptions must be considered in detail, particularly where the impacts challenge the effectiveness of conservation efforts in the area.	Moderate
July 2019_045	SMB Railway	SMB is constructing a railway through the south-eastern part of the South Cogon Concession area.	PS6	CBG has commenced and progressed dialogue with SMB to attempt to ensure that SMB's works within the CBG concession are as closely aligned with the CBG PS6 commitments as possible. This liaison should continue and SMB's activities continue to be monitored.	Low

11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

11.1 Cultural heritage management

The implementation of the Cultural Heritage Management Plan and the companion Chance Finds Procedure was not investigated during the July 2019 site visit. Implementation will be assessed during a subsequent site visit.

APPENDIX 1 AUDIT ITINERARY

Detailed itinerary (text in blue relates to MUA tasks)

Date	HSE (CH)	Biodiversity (AF)	Social (RB)	Resettlement (FG)
Sun 14 th July	Arrive Conakry	Arrive Conakry	Arrive Conakry	Arrive Conakry
Day 1 Mon 15 th July	Drive to Kamsar (am) <hr/> Kamsar HSEC office (Phase 1 Exp) <ul style="list-style-type: none"> - Introductions (opportunity to meet new HSEC resources) - Brief Project status update/ mine plan update) - HSEC organigramme and recruitment - Discuss schedule/logistics MUA (high Level) <ul style="list-style-type: none"> - MUA Project status update - HSEC Resources (from MUA) - Englobe SoW - Integrated schedule of works - Plan for Thursday inspection 	Drive to Kamsar (am) <hr/> Kamsar HSEC office (Phase 1 Exp) <ul style="list-style-type: none"> - Introductions (opportunity to meet new HSEC resources) - Brief Project status update/ mine plan update) - HSEC organigramme and recruitment - Discuss schedule/logistics MUA (high level) <ul style="list-style-type: none"> - MUA Project status update HSEC Resources (from MUA) Englobe SoW Integrated schedule of works <ul style="list-style-type: none"> - Plan for Thursday inspection 	Drive to Kamsar (am) <hr/> Kamsar office from 13.00 – 18.00 <ul style="list-style-type: none"> - Introductions (opportunity to meet new HSEC resources - Brief Project status update/mine plan update (including current resettlement update/future plans) - Community Relations, HR department organigrammes and future recruitment - Discuss schedule/logistics - MUA (high level) <ul style="list-style-type: none"> - MUA Project status update - HSEC Resources (from MUA) - Englobe SoW - Integrated schedule of works <ul style="list-style-type: none"> - Stakeholder engagement and community <i>doléances</i> and grievances (CR Manager and staff) <ul style="list-style-type: none"> o Open grievances o Closure of long-standing grievances o Trends (time permitted)	Drive to Kamsar (am) <hr/> Kamsar office from 13.00 – 18.00 <ul style="list-style-type: none"> - Introductions (opportunity to meet new HSEC resources - Brief Project status update/mine plan update (including current resettlement update/future plans) - Resettlement section organigramme and future recruitment - Discuss schedule/logistics MUA (high level) <ul style="list-style-type: none"> - MUA Project status update <ul style="list-style-type: none"> - Current resettlement update (Kankalaré RAP/current situation; Hamdallaye; Fassaly Foutabhé RAP/current situation and resettlement planning for exploitation of Parawi-Koobi plateau)

Date	HSE (CH)	Biodiversity (AF)	Social (RB)	Resettlement (FG)
				- Future resettlement planning

<p>Day 2 Tues 16th July</p>	<p>(Kamsar office) Implementation of Management Plans</p> <p>Implementation of management/action plans</p> <ul style="list-style-type: none"> - Air Quality Management Plan <ul style="list-style-type: none"> o Stack monitoring o - Water management plan - Emergency Response - Waste management Plan - Environmental monitoring (air, noise, water) - Transport and safety management – Road and Rail Safety - Mine closure and reinstatement - Resource use and energy efficiency - ESMS/Audit Programme - Management of Change - Env. Incidents <p>H&S performance, incl: Diving practices</p> <p>Overnight in Kamsar</p>	<p>Biodiversity team (travels to Sangarédi)</p> <p>Meet with Biodiversity Manager and Biodiversity Team</p> <ul style="list-style-type: none"> - Overview of biodiversity management - Update on implementation of Biodiversity management plans - On site offset projects (progress and implementation against programme) - Review of BMS actions – update - Review of outstanding BMS Actions - Update on Sylvatrop surveys completed in 2018 - Forest Conservation Programme – update <p>Afternoon</p> <ul style="list-style-type: none"> - Biodiversity offset (desktop discussion), including a CBG-specific update on progress to date - 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. Parawi-Koobi plateau, COBAD road, integration of biodiversity aspects into LDP and inspection pro forma) <p>Overnight in Sangarédi</p>	<p>Morning – (Kamsar office) meetings on:</p> <ul style="list-style-type: none"> - Past-compensation Report (CR Manager and Consultant) - Labour and working conditions (CBG - HR Director) - Local content (HR Director) - Labour and working conditions (Contractor – Fluor- HR Director/Manager) <p>Afternoon (Kamsar office)</p> <ul style="list-style-type: none"> - Community development initiatives - Cultural heritage management - Community H&S issues - Security provision <p>Overnight in Kamsar</p>	<p>Resettlement team travels to Sangarédi</p> <p>Accompanied by CR Manager and key members of resettlement team for all activities:</p> <ul style="list-style-type: none"> - 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. - Meeting with the Hamdallaye Resettlement Committee – excluding CBG members (Hamdallaye village) <p>Afternoon</p> <ul style="list-style-type: none"> - Meeting on Livelihood Restoration with CECI representative (Mme Bah, in office and/or in field as necessary) - Debriefing session (CR Manager and key members of resettlement team) <p>Overnight in Sangarédi</p>
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Date	HSE (CH)	Biodiversity (AF)	Social (RB)	Resettlement (FG)
<p>Day 3 Wed 17th July</p>	<p>Morning – tour of Kamsar facilities including:</p> <ul style="list-style-type: none"> - Site surface drainage (CH) - Oil/water separator/tank farm/discharge outside of the fence. (CH) - Location of previous oil spill (mangroves) - Rail workshops - Expansion project facilities (crusher etc) - Waste management facility (Tora Bora) including incinerators - Temporary waste stockpiles (same locations as previous trip) <p>Afternoon</p> <p>Continue discussion about the implementation of management/action plans</p> <p>Overnight in Kamsar</p>	<p>Sangarédi</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 - Ecological reinstatement / mining restoration (2018-19 ecological restoration sites) - level of success <p>Time permitting</p> <ul style="list-style-type: none"> • Waste facility • Parawi-Koobi plateau (if accessible) • Active mining site/construction areas <p>Overnight in Sangarédi</p>	<p>Social team travels to Sangarédi</p> <ul style="list-style-type: none"> - Visit to MUA work sites in Kolaboui - Meeting with Fassaly Foutabhé community members and visit to the village’s community infrastructure compensation projects <p>Afternoon:</p> <p>MUA: Application of Streamlined Compensation Approach</p> <p>Return to Kamsar</p>	<p>Sangarédi</p> <ul style="list-style-type: none"> - Meeting with Fassaly Foutabhé community members and visit to the village’s community infrastructure compensation projects - Meeting on Kankalaré RAP (Update and next steps) (CR Manager): <ul style="list-style-type: none"> o Update and next steps o Links to Kankalaré RAP - Meetings in Telebofi and Parawi settlements with ‘returnees’ from Kankalaré hamlets (young /old; men/women) - Debrief session (CR Manager and key members of resettlement team) <p>Overnight in Sangarédi</p>
<p>Day 4 Thurs 18th July</p>	<p>Morning:</p> <p>Morning – (CFB Office) meetings with CFB/Englobe personnel on:</p> <p>MUA: Current status/ Future activities:</p> <p>Authorization and schedule:</p> <ul style="list-style-type: none"> - Integrated schedule (Project and E&S activities /milestones) - Permits 	<p>Morning:</p> <p>Departing from Sangare di</p> <p>Biodiversity team to visit areas of potential biodiversity value as described in ESIA, escorted by Serge (departing from Sangare di)</p> <p>Depart for Kamsar</p>	<p>All day:</p> <p>Visit MUA sites, all day: (RB, BV, others)</p> <p>Travel to construction and other sites along railway from PK 1 to PK 119</p> <p>Participants</p> <p>Departing from Kamsar</p> <p>Day to include</p>	<p>Morning: TBC</p> <ul style="list-style-type: none"> - Parawi-Koobi plateau and resettlement: Update - Parawi-Koobi plateau: Site visit <p>Afternoon:</p> <p>Depart for Kamsar</p>

APPENDIX 2

KEY PROJECT DOCUMENTATION MADE AVAILABLE FOR REVIEW

Ref no.	Document Title	Organisation
1	Élaboration d'une stratégie de sécurité communautaire sur le rail de la Compagnie des Bauxites de Guinée – CBG: Rapport final (March 2019)	IFC
2	Communication: SMB permitted preliminary works on CBG mining concession (2019/07/08)	CBG
3	Formulaire de rapport PbP: Hamdallaye: Travaux permis de perturbation du sol (Plans de contingences) (31 July 2019)	CBG
4	Fluor Monthly HR statistics 2019	Fluor/CBG
5	Total Manpower 2017 - 2019 Project Phase I	CBG
6	Assorted MUA/CBG documents on <i>inter alia</i> : community grievances, requests for assistance; employment, digging of wells/boreholes; stakeholder consultations (PVs); community sensitization activities; and PAP survey results	CBG/CFB
7	Hard copies of PPT presentations on: MUA Status; Expansion Project Phase 1 status; Hamdallaye and Fassaly Foutabhé RAP status; and SMB works in the CBG Concession Area.	CBG/CFB
8	Copies of sections of CBG Registers of community grievances and requests for assistance (doléances)	CBG
9	Monthly waste reports (sample)	CBG
10	Land disturbance permits (all to date)	CBG
11	Communications with SMB	CBG
12	Permits to work (selection)	CBG
13	Faunal Survey reports for Chimpanzees, birds and reptiles	Guinea Ecology/ Sylvatrop

APPENDIX 3

STATUS OF ISSUES IDENTIFIED IN PRECEDING MONITORING VISITS

Appendix 3.1 - Status of Issues raised in December 2018 site visit report

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
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	Open
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 are afforded to remote locations/relatively small construction sites 	Moderate	Closed (on the basis the IESC was informed that all vehicles are now equipped with warning flags)
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	Superseded (see July 2019_003)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
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 the procedure to follow in case of a site evacuation.	Moderate	Superseded (see July 2019_004)
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	Open (Considerable progress has occurred. Only two grievances from 2016 remain open with one of them expected to be closed soon)
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	Closed

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
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	Closed (actions have been taken to prevent further erosion, including construction of sedimentation basins)
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	Superseded (see July 2019_014)
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	Open (pending information on corrective actions implemented)
Dec 2018_010	Waste management – temporary storage areas adjacent to secondary crusher and elsewhere	The volumes of stockpiled wastes have increased significantly. A number of housekeeping issues are observed: <ul style="list-style-type: none"> • Unlabelled drums; • Hydrocarbon staining; • Trips hazards; • Likely VOC emissions from open drums; and • Poor signage on shipping containers intended for 	Construction	CBG should improve practices at this and other temporary storage areas, for example, labelling of hazardous storage areas and general house-keeping to reduce safety hazards) and expedite removal of wastes to be recycle by external service providers e.g. the large volumes of scrap metal witnessed.	Minor	Ongoing (improvements have been made but efforts to further improve housekeeping, management of wastes is required)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
		temporary storage of hazardous wastes. Elsewhere, spent oil for use as fuel for the dryers is stored in sealed metal containers but without secondary containment.		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.		
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	Open (IESC notes the site will be secured as part of a planned upgraded of the site. CBG has reported no evidence of scavenging at night)
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
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	Open (CBG currently has 1 surface miner awaiting repairs and no short-term plan to procure additional units)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
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	Closed CBG reported measures put in place to manage dust. Roads were wet at the time of the July 2019 site visit
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	Closed (No herders have returned during the 12-month monitoring period)
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	Open (Crossing points and access routes have been identified, but no internal validation or community consultation has yet occurred. It is planned to occur)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
Dec 2018_ 017	Provision of shade for new Hamdallaye village site	Following the failure of the campaign to plant acacia <i>spp</i> 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	Superseded (See Issues: ID July 2019_026 and 2019_27 in Table 9.1 above)
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	Closed
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)	Open (only with respect to updating of the Resettlement Policy Framework)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
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)	Open
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	Open
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	Open
Dec 2018_ 023	Telibofi and Parawi villages and returning/relocating people/households	A livelihood restoration programme for displaced people from the Kankalaré hamlets (including those considered to be vulnerable) is required by the Gap Analysis Report. Other villagers (acting as 'hosts' for non-natal individuals/household relocating to the village) will not be entitled to	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	Moderate	Open

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
		participate in this programme if they had no affected assets. This could cause intra-village social tensions.		formulated and applied to manage any additional risks, as necessary. CBG to consider risk of social tensions and if assessed as being likely to occur consider extending livelihood restoration measures to all villagers.		
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	Closed (A separate well has been made available for villagers to use, thereby avoiding conflict. Some villagers continue to use the spring as the preferred water collection point)
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	Ongoing (good progress is being made)
Dec 2018_026	Aerial/satellite imagery	Ground conditions are constantly in flux and changing. Regular updated aerial or satellite imagery would assist	PS6	An aerial or satellite imagery acquisition programme should be established, and data updated	Low	Open

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
		Biodiversity and Social Teams with their planning and identify key issues.		regularly e.g. every 3, 6 or 12 months. Ensure most cost-effective approach is adopted and challenge market place.		
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	Closed (progress made)
Dec 2018_028	Social and Biodiversity cooperation	Community matters impacting Critical Habitat	PS6	CBG should further its current efforts to ensure greater cooperation between the Biodiversity and Social teams in order to address issues which arise and impact on both people and/or Threatened species and Critical Habitat and wider biodiversity issues.	Moderate	Open (Ongoing action required. In particular, there are instances where the biodiversity team could help the social team with regards to rehabilitation of proposed resettlement villages)
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	Open (ongoing) (IESC notes progress in restoration of area has been made)
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	Moderate	Closed

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2019)
				was overgrown with weeds. The IESC recommends that a maintenance contract is started to ensure these areas are cared for and maintained.		(framework contract in place for management of nurseries)
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	Closed (good progress with rehabilitation)
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	Open
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	Superseded (see July 2019_042)

Appendix 3.2 - Status of Issues raised prior to the December 2018 site visit report

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

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in July 2019
Feb 2018 _007	Human Resources documentation	The required documentation has not been submitted to Lenders/IESC.	Construction and Operations / PS2	Prepare, approve, disseminate (as appropriate) and implement the required policies and procedures regarding employment practices and management of employees.	Moderate	Open (at time of visit then closed shortly after - see below) 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.
Feb 2018 _009	Oil spill - incident	CBG experienced a release of oil in December 2017. The release was caused following the diversion of oily water from the main (new) oil water separator. The new (2-year old) oil water separator has been malfunctioning and is under repair at the time of writing this report.	Operations/ PS3	Confirmation is required that corrective actions are being implemented and that repair works to the skimmer are completed. CBG should confirm that post repair discharge of oil is compliant with IFC limits.	Moderate	Superseded (see July 2019_014)

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in July 2019
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 _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	Superseded (there is no longer an Expansion HSEC team, only CBG (Operations) HSEC team (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 _029	Plateau-by- plateau management units / Rehabilitation Plan	Landscape planning for rehabilitation	All / PS6	The 2018-2023 rehabilitation plan does not set out the decision-making process required to define the most appropriate vegetation restoration technique. This detail has yet to be incorporated into the plateau-by-plateau management tool and is essential to ensure that the needs of local communities and for the restoration of natural (and critical habitats) are balanced.	Moderate	Open (ongoing) Significant progress has been made. Mining team and biodiversity teams working closely on PbP and habitat restoration progress has increased. CBG on target to restore 179 ha in

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in July 2019
						2019, which is in line with the rehabilitation plan target of 150-250 ha per annum.
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	Superseded (see July 2019_038).
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 (see July 2019_039)
Feb 2018 _036	West African Red Colobus	The West African Red Colobus occurs on an island located between CBG's North Cogon concession and COBAD.	All / PS6	Make best endeavours to influence and support COBAD to implement appropriate mitigation measures to protect the habitat for this species.	Minor	Open Progress made. CBG undertook monitoring studies for the species on the island in 2018 and 2019 and the results will be used to develop a management plan for discussion with COBAD
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.	Moderate	Open (status remains unchanged since Feb 2018)

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in July 2019
				Select and implement the preferred option so that no disruption to attendance occurs.		
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	Closed (proforma revised and training provided)
July 2017 _035	Land Disturbance Permit	Land Disturbance Permit (LDP) proforma does not systematically capture all of the 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 (good progress however remains '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. Significant risk from sedimentation into gallery forest and watercourse critical habitats.	All	A restoration plan for the rivers needs to be developed. The responsible party to complete the works need to be identified and the budget made available. Liaise with COBAD over works required to prevent sedimentation into gallery forest and watercourses.	High	Open (Progress has been made since July 2017 on restoration, but additional works are still required) Issue to be revisited during next IESC monitoring visit.
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	Closed (monitoring undertaken in 2018) (see also July 2019_041)

APPENDIX 4 PHOTO LOG