



DEPLIS 1263

STAKEHOLDER ENGAGEMENT PLAN 2019-2021 MUOA-AMENDED SUMMARY VERSION

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ABBREVIATIONS AND ACRONYMS

AMR	Annual Monitoring Report
AIDS:	Acquired Immune Deficiency Syndrome
BGEEE:	Bureau Guinéen d'études et d'évolution environnementale
BMS:	Biodiversity Management System
CBG:	Compagnie des Bauxites de Guinée
COBAD:	Compagnie de Bauxite et d'Alumine Dian-Dian
ESIA:	Environmental and Social Impact Assessment
ESMS:	Environmental and Social Management System
ESMP:	Environmental and Social Management Plan
GAC:	Guinea Alumina Project
HIV:	Human Immunodeficiency Virus
HSEC:	Health, Safety, Environment and Community
IFC:	International Finance Corporation
IUCN:	International Union for Conservation of Nature
LRP:	Livelihood Restoration Plan
MUOA:	Multi-User Operational Agreement
MTPA:	Million tonnes per annum
RAP:	Resettlement Action Plan
RCGC:	Resettlement, Compensation, Grievance Coordinator
RPF:	Resettlement Policy Framework
SEP:	Stakeholder Engagement Plan
ToR:	Terms of Reference

1. INTRODUCTION

1.1. Background

This document is a summary version of the Stakeholder Engagement Plan (SEP) (D390-SOC-PLN-005) developed for the Compagnie des Bauxites de Guinée's (CBG) which increased bauxite production from 15 MTPA to a production capacity of 18.5 MTPA following the achievement of Phase 1 Expansion Project. Details on the expansion project are presented in Section 1.

The SEP is prepared according to IFC Performance Standards and complies with local laws and regulations as well as with CBG's HSEC policy which requires CBG to communicate regularly, openly and honestly with people affected by its operations, and to take their comments and concerns into account in its decision-making.

The purpose of the SEP is to establish and maintain positive relationships with external stakeholders (i.e. individuals, communities, local government authorities, or other interested/ affected parties) over the project's life cycle. The SEP describes CBG's strategy and program for engaging with stakeholders in a culturally appropriate manner and also describes the process through which stakeholders can express their views and concerns and through which the company considers and responds to them.

The SEP helps CBG manage and facilitate engagement activities through the project's various phases, from construction to closure and rehabilitation. It is reviewed and updated on a regular basis when project activities change or when new activities relating to stakeholder engagement commence. It is also periodically reviewed during project implementation and updated as deemed necessary.

The SEP Action Plan (D390-SOC-AP-000) lists and defines actions CBG is taking and will take to deliver each objective and commitments presented in the SEP. The Action Plan permit to monitor these actions and to ensure that CBG is implementing its SEP.

1.2. Structure of the SEP

In its integral version, the SEP comprises the following twelve chapters:

Chapter 1 - Introduction


This chapter presents the project background as well as the SEP's goal and objectives.

Chapter 2 - Project Description

This section briefly describes CBG's operations as well as the expansion project and the MUOA Project. It also presents the environmental and social studies that were carried out thus far for the expansion project and the MUOA Project, as well as the project's key environmental and social issues.

Chapter 3 – Methodology

This section presents the methodology that was followed to prepare the current SEP.

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Chapter 4 – Requirements

This chapter provides an overview of the project’s national legal and regulatory requirements pertaining to stakeholder engagement, the IFC’s applicable performance standards, as well as the engagement requirements identified in CBG’s corporate policies and in the various environmental and social studies conducted thus far for the expansion project.

Chapter 5 – Summary of Previous Stakeholder Engagement Activities

This chapter summarizes stakeholder engagement activities that were conducted during the expansion project’s Environmental and Social Impact Assessment (ESIA) as well as consultation activities that have been carried out during subsequent studies (the Resettlement Policy Framework (RPF), Resettlement Action Plan (RAP) for villages of Hamdallaye and Fassaly Foutabhé, Biodiversity Management System (BMS)¹, COBAD road ESIA Report, Kankalare RAP, MUOA 2017 ESIA Report (including its 2019 Memorandum), and the MUOA Livelihood Restoration Plan (LRP), and CBG-led information disclosure and consultation activities).

Chapter 6 – Project Stakeholders

Chapter 6 begins by presenting the methodology used for grouping project stakeholders that will be informed and consulted about the project and the CBG’s operations and social interventions. It then presents the key stakeholder groups and sub-groups, vulnerable groups, a stakeholder map as well as stakeholders’ main concerns regarding CBG’s operations.

Chapter 7 – Stakeholder Engagement Program

This chapter summarizes the SEP’s main goal, its specific objectives as well as the engagement principles according to which the SEP has been prepared. It also describes the type of information that will be disclosed, in what format and what communication and consultation methods will be used to engage with the stakeholder groups identified in chapter 6. This chapter also summarizes how the views of women and vulnerable groups will be taken into account during the process.

Chapter 8 – Timetable

Chapter 8 presents the annual stakeholder engagement plan’s schedule, which outlines dates, periodicity and locations of stakeholder engagement activities.


Chapter 9 – Grievance Mechanism, Commitments Management and Requests Management

This chapter summarizes the grievance mechanism, commitments management, and community requests management systems that have all been put in place by the CBG.

Chapter 10 – Resources and Responsibilities

This chapter presents the resources devoted to managing and implementing the SEP and describes their respective responsibilities.

¹ To be replaced in 2021 by a Biodiversity Action Plan.

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Chapter 11 – Monitoring and Reporting

Chapter 11 describes CBG’s plan to involve project stakeholders in the monitoring of project impacts and mitigation measures as well as CBG’s approach to reporting back to stakeholders regarding the results of engagement activities.

Chapter 12 – Management Functions

This last chapter summarizes how the stakeholder activities is integrated into the CBG’s Environmental and Social Management System (ESMS) and with other core business functions.

The present document is a summary version of the SEP. It does not include all of the chapters listed above. This document aims to summarize the outline of the SEP.

2. PROJECT DESCRIPTION

CBG is a mining company owned jointly by the Government of Guinea and Halco Mining (Alcoa, Rio Tinto Alcan and Dadco). It was created in 1963 and its facilities have been in operation since 1973.

CBG extracts, transports by rail, processes and ships bauxite from its facilities, located in Kamsar and Sangarédi in northwestern Guinea (Map 1).

2.1. CBG Expansion Project

CBG increased its bauxite production to a production capacity of 18.5 MTPA (at 3% moisture content) following the achievement of Phase 1 Expansion Project. A series of works and investments were made in order to achieve this increase in ore production, processing and shipping—such as the purchase of new rolling stock (railcars, locomotives), a new rail yard at Kamsar, extension of the existing quay (south) and dredging of part of the port. As part of this project, CBG has undertaken an Environmental and Social Impact Assessment (ESIA) and developed a number of plans to manage the project’s environmental and social impacts.

2.1.1. Expansion Project ESIA


An ESIA was completed in 2014 for the project. The Study identified key impacts to the social, biological and physical environments in the project’s zone of influence. This study involved significant consultation of affected people and included an Environmental and Social Management Plan (ESMP) identifying specific actions that the CBG will implement in order to address the project’s impacts.

The expansion project ESIA was updated in 2018 to cover phase 2 of CBG’s expansion project.

2.1.2. Management of Expansion Project Impacts

Resettlement Policy Framework

A Resettlement Policy Framework (RPF) was developed for the project in 2015 and is being revised. The RPF identifies resettlement impacts and lays out CBG’s approach to managing physical and economic displacement and livelihoods restoration. The RPF also includes specific approaches for consultation of affected persons as well as a grievance management process aligned with the process identified in this SEP.

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Resettlement Action Plan – Hamdallaye & Fassaly Foutabhé

Two villages in the mining concession – Hamdallaye (population 658) and Fassaly Foutabhé (population 104) – have been affected by physical and economic displacement caused by the construction of a new sorting yard as well as by mining activities on their village territories. Hamdallaye has been physically resettled to a new site to the east of its present location but within its existing village territory. Fassaly Foutabhé is maintained in its present location but will be affected by a loss of land used for farming, livestock grazing and natural resource harvesting. A Resettlement Action Plan (RAP) was completed in 2015 that was the fruit of extensive consultation and negotiation with local communities. The final RAP included a process for consultation throughout RAP implementation as well as a grievance mechanism.

Biodiversity Management System

A Biodiversity Management System (BMS) has been developed for the project that identifies the key issues relating to biodiversity for the Expansion Project and outlines how CBG will manage its biodiversity risks. The development of the plan included the involvement or participation of local populations and organizations.

The plan includes a process for regular consultation of the public (especially local communities and authorities) and active and continuous public participation throughout its implementation.

2.2. COBAD Road ESIA

In 2016, the Compagnie de Bauxite et d’Alumine Dian-Dian (COBAD) started to build a mining haul-road in the western portion of the South Cogon sector in the CBG-Halco mining concession. The purpose of the road is to allow COBAD to transport bauxite ore extracted from its concession (to the north) into the CBG-Halco concession, and to store it before it is transferred to a new link with existing railway infrastructure, in order to be sent to COBAD port facilities located near Kamsar.

An ESIA was completed for the road in August, 2016. The ESIA involved extensive consultation with affected persons. An additional study was completed in 2016 for a rail loop connecting the COBAD road to the Boké railway.


2.3. Boké Railway Multi-user Agreement

CBG, along with regional mining projects GAC (Guinea Alumina Project) and COBAD, have completed the expansion of the Boké railway to accommodate additional tonnage from CBG’s expansion and the initiation of production on the two other projects. This project involves doubling significant stretches of the existing railway with a potential for an increased risk of accidents along the rail corridor. An ESIA was conducted to study the environmental and social impacts of the project. In 2019, an external firm (Englobe) was appointed to support in the implementation of mitigation measures described in the ESIA. An update of the scope of work for the MUOA project was necessary. A memorandum was then completed by Englobe in 2019 to provide additional information to the ESIA. All references to the MUOA ESIA 2017 are to be understood as including the 2019 Memorandum, unless specified differently.

2.4. CBG Project Operating Zones

CBG’s project is divided into three main zones:

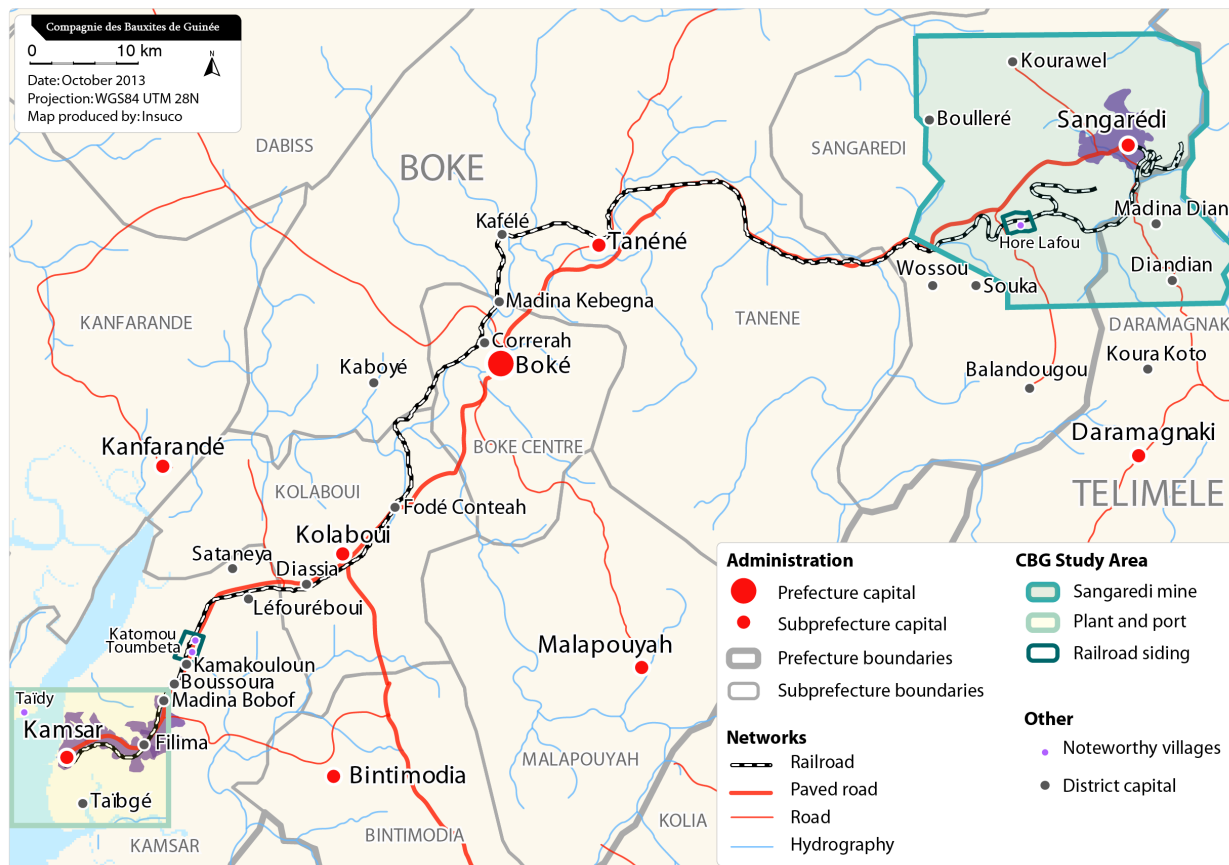
1. Mining Area

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2. Railway
3. Port & industrial facilities

Operations in these three areas as well as key impact sources are discussed below.

Map 1 - CBG Project area



(Source: ÉEM. Environmental and Social Impact Assessment of the CBG Mine Expansion Project)


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2.4.1. Mining Area

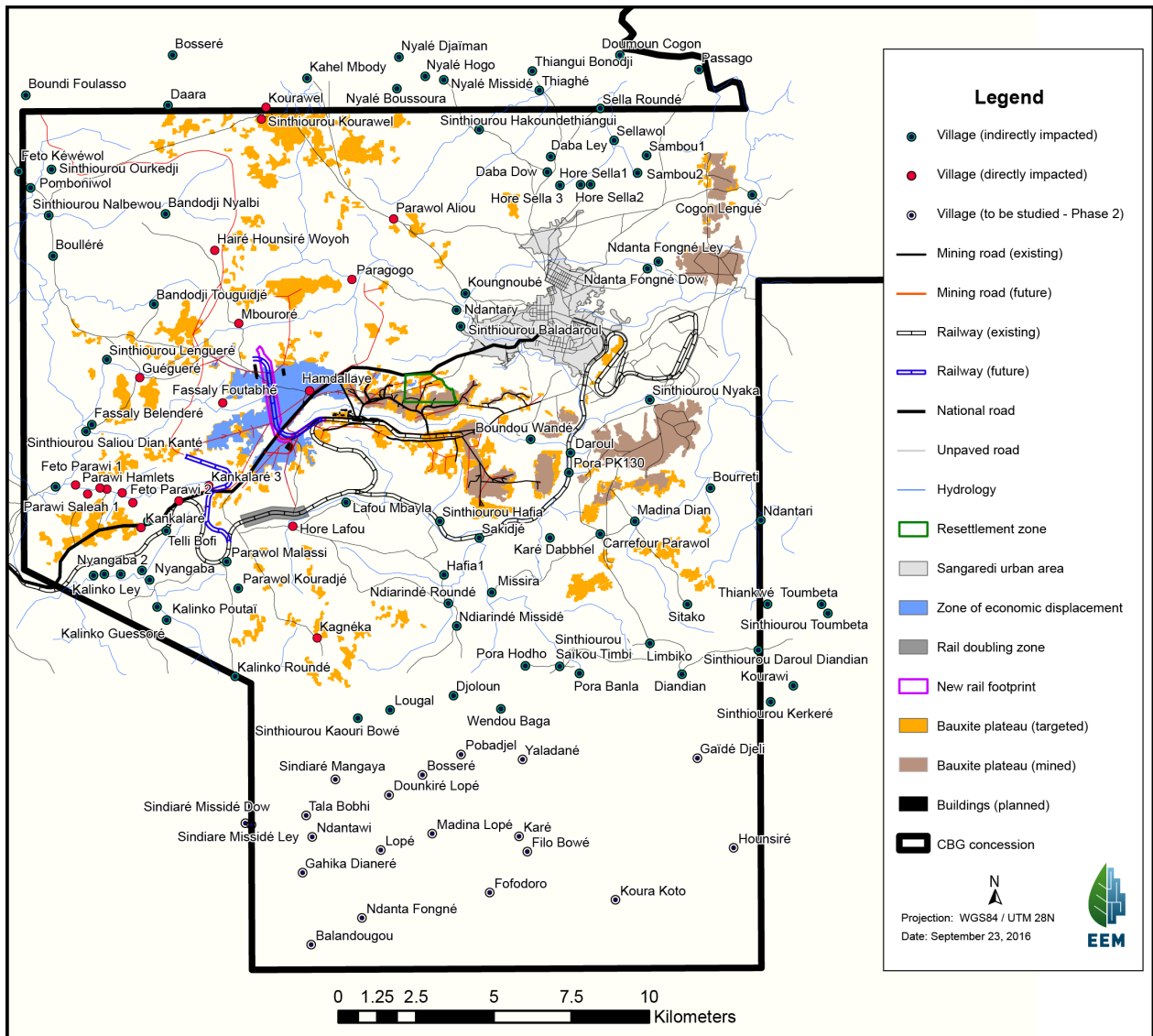
The mining area surrounds the town of Sangarédi (Map 2). Bauxite is extracted from plateaus and loaded onto railcars for transportation to Kamsar for processing and shipping. The population in this zone lives either in the urban area of Sangarédi (with a population of 53,789² inhabitants) or the rural area within which the CBG's extractive activities take place (with a population of 16,220).

The majority of Sangarédi's population are not originally from the town but migrated there in search of employment with the CBG or other economic opportunities. This contrasts with the rural area, where the majority of residents were born in the village in which they presently reside. Sangarédi's residents largely participate in a wage-economy consisting of employees of the CBG and their families as well as those working in related and unrelated economic sectors. Residents of the rural area, however, largely practice subsistence livelihoods based on agriculture and livestock herding.

² Source : Environmental and Social Impact Assessment of the CBG Mine Expansion Project

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Map 2 - Mining Area Map

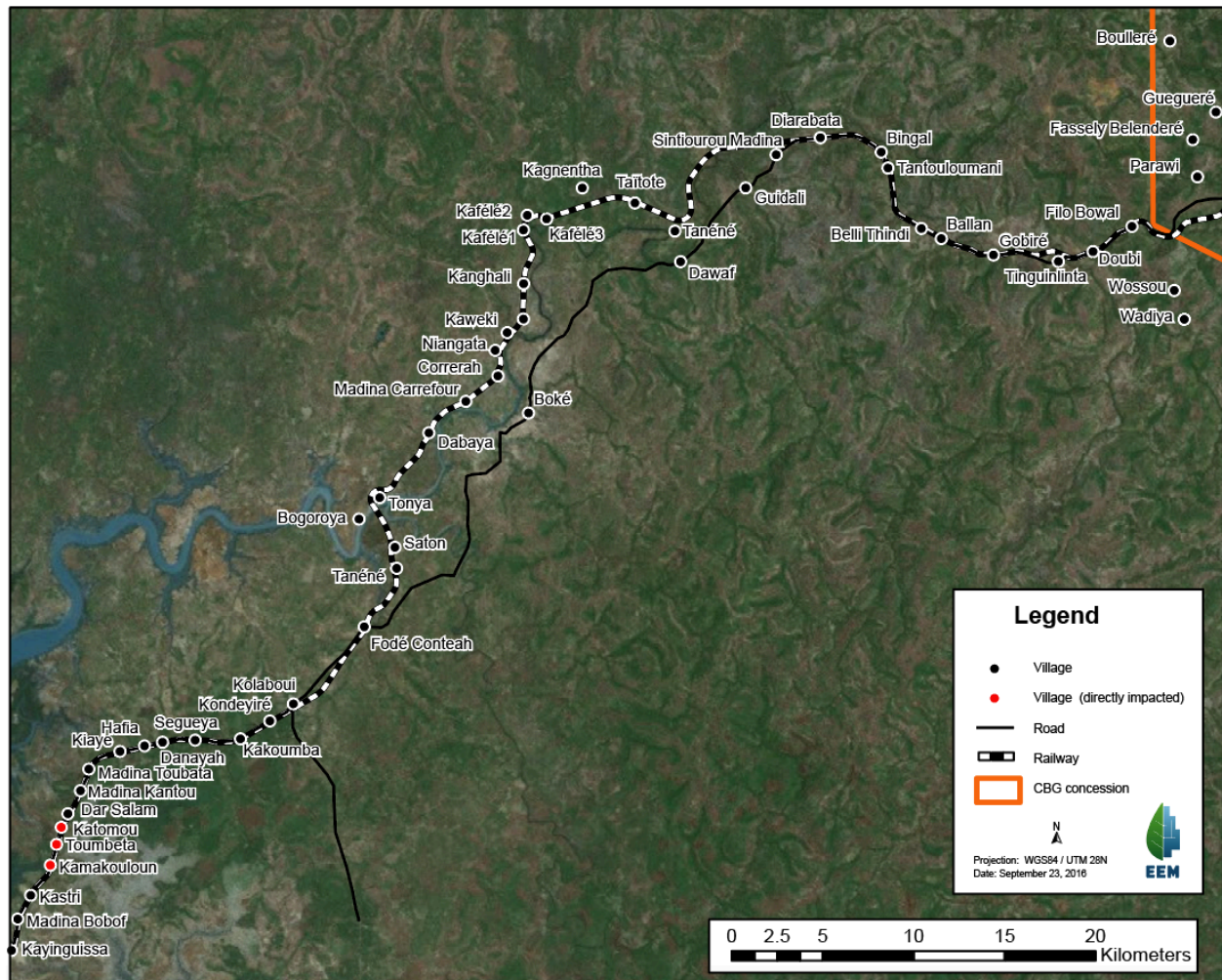



Principal impact sources in the mining zone are the construction and operation of mining infrastructure, including bauxite plateaus, haul roads (including the COBAD road) and rail infrastructure, as well as CBG’s employment and procurement activities.

2.4.2. Railway

The Boké Railway extends some 135 kilometers from the Sangarédi mining area to Kamsar (Map 3). The majority of villages along the rail corridor practice subsistence-based livelihoods based on agriculture and herding. However the rail corridor also includes the town of Boké, the administrative centre of the region where both the Governor and the Prefect are based. Boké is also a regional centre for education and is home to a number of trades colleges as well as the Institute of Mines and Geology (formerly a branch of the University of Conakry).

Map 3 - Railway Area Map



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Principal impact sources in the railway zone are the passage of trains hauling bauxite to Kamsar and returning to Sangarédi as well as the construction of a rail siding at PK 14 affecting the villages of Toumbéta, Kamakouloun and Katoumou. As mentioned in section 2.3, the expansion of the Boké Railway led to six longer stretches of doubled track of a total of 35.2 km² within the ANAIM right of way: PK 3 – 11,2 et PK 15,6 – 18,2 (Kamsar), PK 30,3 – 38,6 (Kolaboui), PK 51,5 – 53,8 (Correrah), PK 70,7 – 71,6 et PK 74,7 – 78 (Tanéné), PK 87,2 – 91,7 (GAC Mine – Tanéné), PK 117 – 119, 4 (Parawol).

2.4.3. Port

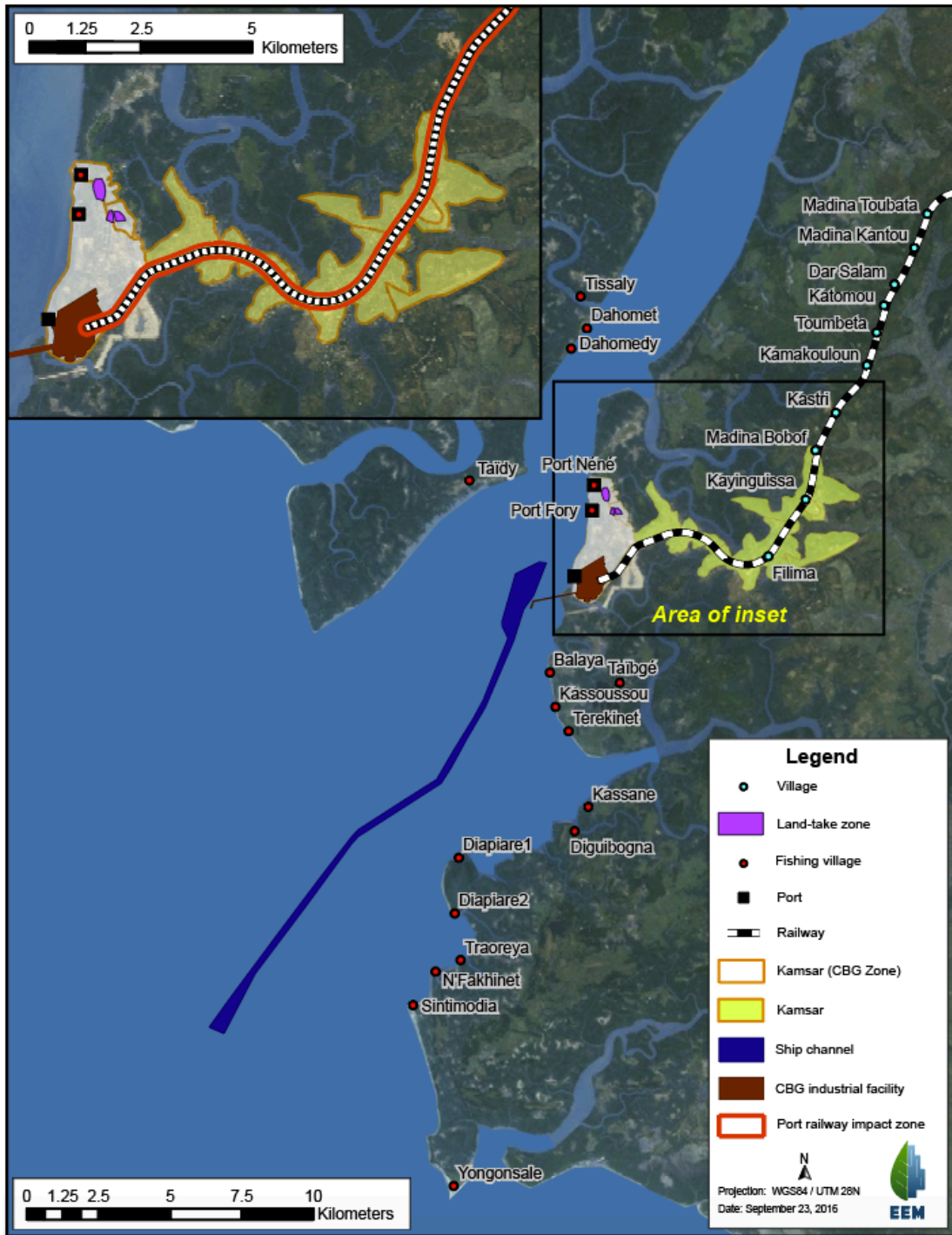
CBG's port facilities are in the town of Kamsar located in the Rio Nunez estuary (Map 4). CBG's operations in Kamsar consist of the railway and an industrial facility at which bauxite is received, crushed, dried, stockpiled and loaded on to ships via a 1 km. long jetty for transport to international markets. Population estimates for Kamsar range from 120,000 to 300,000. The town is divided between Kamsar Cité, a zone of housing and services reserved for CBG employees and their families, and Kamsar Centre, an urban core and outlying districts that has expanded significantly since CBG initiated its operations in 1973. Residents in the urban core of Sangarédi participate in a largely wage-based economy in sectors both related and unrelated to the CBG project. Those in outlying districts practice subsistence livelihoods based on agriculture and fishing.


In the greater region of Kamsar, there are also a number of towns and villages where the local economy revolves around fishing and fish processing. These include two ports (Port Fory and Port Néné) as well as a number of villages stretching along the Rio Nunez estuary in proximity to Kamsar.

Principal impact sources in the port zone include the passage of trains to and from CBG's industrial facility, air-pollution and dust due to the operation of the industrial facility, operation and expansion of housing and services in the Kamsar Cité, the extension of CBG's jetty and dredging in the Rio Nunez estuary, the arrival and departure of bauxite carrying ships as well as CBG's employment and procurement.

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Map 4 - Port Area Map



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2.5. Key Engagement Themes

The table below summarises key communications and consultation themes in CBGs stakeholder engagement process. These themes are based on the assessment of project impacts conducted in 2014, and on the assessment impacts conducted in 2016 as part of the MUOA ESIA.

Table 1 - Communications and Consultation Themes

Category	Theme
Community Relations Management	Complaints mechanism
	Management of community assistance requests (“ <i>doléances</i> ”)
	Impact Assessment presentation
	Internal CR awareness raising
	Monitoring programme
	CBG community relations approach
Compensation and Resettlement	Compensation approach
	Asset inventory
	Census
Economic Impacts	Employment & training
Environmental Impacts	Air pollution and dust
	Water pollution
	Biodiversity protection
	Natural resources protection
	Noise & vibrations
	Water (quality & access)

Category	Theme
Social Impacts	Blasting
	Community social investment
	Cultural heritage preservation
	Disease prevention (HIV/AIDS, Ebola, Malaria, Covid-19)
	Electricity, Water, Healthcare, Education
	Expansion project
	Influx management
	Social impacts related to MUOA (i.e. road/rail safety, notification of works, etc.)
	Land rehabilitation
	Livelihoods restoration
	Maritime safety
	Railway safety & crossings
	Resettlement & compensation
	Road safety (mine and other)
Transport (ex. village roads, rail crossings)	

3. METHODOLOGY

3.1. SEP Development Process

The development of the SEP involved the following key steps:

- **Context Assessment:** Validation of existing stakeholder engagement processes, procedures and tools;
- **Stakeholder Analysis:** identification of site stakeholders and organisation of these into key groups and subgroups;
- **Requirements Mapping:** Assessing requirements for stakeholder engagement including:
 - Guinean law;
 - International norms; and
 - CBG policies and requirements, including those contained in the project Environmental and Social Management Plan, and loan covenants with lenders.

- **SEP Workshop:** A workshop held in Kamsar in March 2020 with the social (community relations and resettlement) and communication teams that included:
 - Establishing CBG’s objectives for the SEP;
 - Assessing project impacts affecting key stakeholder subgroups as well as the degree of influence they can exert over the project;
 - Development of a stakeholder map for the project;
 - Identifying and documenting past consultation activities led by the CBG and currently planned activities;
 - Identifying existing consultation and communication platforms;
 - Establishing key themes upon which the CBG must communicate and consult with its various stakeholders;
 - Identifying roles and responsibilities for implementation of the SEP and formalising capacity-building plans for key staff;
 - Establishing a process for internal reporting and review in relation to the Stakeholder Engagement Programme (including reporting to project lenders); and
 - Establishing a process for data management in relation to stakeholder engagement activities.
- **SEP update:** update the SEP and validation with the Community Relations and Communications team.


4. REQUIREMENTS

The requirements for the SEP can be summarised in the following categories:

1. The National Legislative and Regulatory Framework in Guinea
2. The International Normative Framework Applicable to the Project
3. CBG Requirements: including those stemming from the project’s Environmental and Social Action Plans as well as related commitments to project lenders and CBG internal policies.

5. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

CBG conducted an Environmental and Social Impact Assessment (ESIA) for the expansion project in 2014. Significant community consultation was conducted during this assessment.. Some deficiencies in consultation, communication and staffing were noted in the ESIA leading to CBG creating a community relations group and hiring staff. Since the submission of the ESIA, CBG has undertaken considerable consultation with community stakeholders. In addition to this, additional environmental and social studies and management plans have been implemented that have involved community consultations.

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5.1. Consultation in the 2014 ESIA

As part of the environmental and social impact assessment (ESIA), the ÉEM team carried out three rounds of stakeholder consultation: a scoping mission, in which consultations were carried out with more than 500 individuals inside the study area, and stakeholder engagement plan; a socioeconomic baseline study and a Social Impact Assessment consultation mission. In addition, CBG organized and led six information sessions in December 2013 to inform authorities and communities about the Expansion Project. The impact assessment and mitigation measures were presented to community stakeholders in a series of consultations led by CBG and the BGEEE (part of the Ministry of Environment, Waters and Forests) as a final step in the completion of the ESIA.

5.2. Consultation Post 2014 ESIA

Subsequent to the completion of the ESIA, a number of consultations were carried out both by the CBG and by consultants carrying out additional environmental and social studies and drafting environmental and social management plans. This additional consultation mainly took place within the context of:

- Development of a Resettlement Action Plan (RAP) for Hamdallaye & Fassaly Foutabhé, two villages affected by mining activities and related infrastructure.
- Development of a Resettlement Action Plan (RAP) for Kankalare.
- An ESIA for the COBAD road.
- An ESIA for the Multi-User Operational Agreement (MUOA).
- Development of a Livelihood Restoration Plan (LRP) for the Multi-User Operational Agreement.

5.2.1. Hamdallaye / Fassaly Foutabhé RAP


Stakeholder Engagement, as part of the development of the RAP, involved public consultations followed by two weeks of focus group discussions broken down into three groups that took place in May 2015 :

1. Women
2. Youth
3. Elders

This consultation delved into the specific aspects of the RAP in order to ensure understanding of the RAP process and detailed community input into its development. The final RAP was presented to affected communities in public meetings held in November 2015 followed by focus group discussions targeting the three aforementioned groups to allow for detailed discussion and validation of the RAP.

5.2.2. COBAD Road ESIA

Three series of consultations were organized to discuss the concerns of the population potentially affected by the COBAD road Section 1, 2 and 3 from April to July 2016, and November 2016. Various communities consulted expressed similar concerns, due in part to the fact that they met prior to the consultations to share their concerns and expectations about the project.

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5.2.3. Kankalaré RAP

For the Kankalaré RAP, regular consultation and engagement with the following key stakeholder groups were conducted: economically and/or physically displaced persons, the host communities as well as governmental authorities at the local and sub-prefecture levels. The engagement forums were composed of the following stakeholders: Village Chiefs or their representatives, a representative of the Commune, a representative of the sous-prefecture, women's groups, youth representatives, CBG's representatives.

Kankalaré Phase 1 main consultations activities were conducted from April 2016 to march 2018 and Phase 2 consultation activities were conducted from january 2018 to october 2018. The consultation activities included formal or informal meetings, and communication sessions.

5.2.4. Multi-User Operational Agreement ESIA


As part of the MUOA Environmental and Social Impact Assessment (ESIA), the ERM team, a third-party consultant, carried out two rounds of stakeholder consultation: consultation held during the baseline assesement in September and October 2016 and consultation held during the assessment on the project's in November 2016. Preliminary results were presented to the BGEEE in March 2017. Following this presentation, and the approval of the Terms of Reference (ToR), permission to begin work was submitted subject to the completion of the ESIA within a short period of time. The full ESIA was therefore completed in June 2017.

In addition, CBG organized and led 7 information sessions in February and March 2017 to inform authorities and communities about the MUOA and the start of the work. As the preliminary presentation of the ESIA to the BGEEE in March 2017 showed some confusion as to the expected direct impacts on the identified infrastructure and the right-of-way of the project, Englobe team performed a supplementary information package to MUOA ESIA in October 2019 (the Memorandum). The impact assessment and mitigation measures were presented to community stakeholders and authorities in a series of public consultations led by Englobe, CBG and the BGEEE in December 2019, as a final step in the completion of the ESIA.

As part of the MUOA Project, the CBG proceeded with the development of a LRP and to do so, several consultation activities were done.

5.2.5. CBG-Led Consultations

In parallel with ongoing studies and management plans, the CBG has carried out a number of consultations with community stakeholders since setting up a dedicated Community Relations Department in 2015.

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6. PROJECT STAKEHOLDERS

The objective of identifying key stakeholders is to:

- Determine priority groups with whom to engage;
- Identify key themes around which to engage with priority stakeholder groups; and
- Determine appropriate communications and engagement channels for stakeholder groups.

6.1. Methodology

The platform upon which stakeholders are prioritised is the CBG project stakeholder map. This map positions stakeholder groups based on the degree to which the project impacts them and the degree of power they can exert over CBG's project.

6.1.1. Grouping

To develop the CBG project stakeholder map, stakeholders were clustered into groups and subgroups that are similarly impacted by the project, that can exert a similar influence and that can be targeted using one coherent engagement approach. Stakeholders were subsequently analysed at the level of the subgroup as outlined below.

6.1.2. Impact and Power

For regional stakeholders – those within Guinea broadly speaking and those within the project's three main operating zones – an impact analysis was undertaken to identify which of the impacts identified in the 2014 CBG Social Impact Assessment (SIA) would affect them and to what degree (either a direct or indirect impact). It should also be noted that impacts in this analysis were weighted according to the level of severity detailed in the 2014 ESIA. The impact analysis also took into account the impacts identified in MUA ESIA.

For international stakeholders and internal stakeholders (i.e. those not 'impacted' by the project in the same way as regional stakeholders) an analysis was conducted to identify key themes concerning each stakeholder group.

For regional stakeholders an analysis was then undertaken to determine the level of influence the stakeholder group can exert over the project.

6.1.3. Stakeholder Prioritisation

The result of this analysis, for regional stakeholders, is a stakeholder map that situates stakeholders in four quadrants of a Power/Impact matrix, as outlined in the table below.


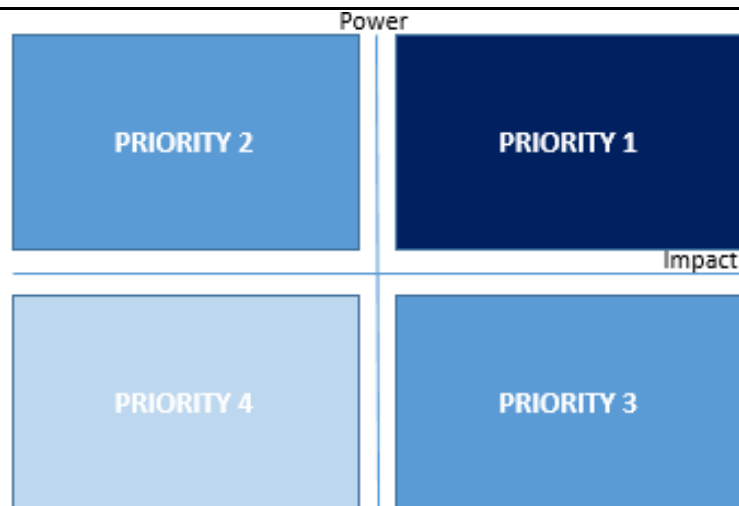
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Table 2 - Stakeholder Priority Ranking

Priority	Power	Impact
Priority 1	HIGH	HIGH
Priority 2 (Satisfy)	HIGH	LOW
Priority 3 (Inform)	LOW	HIGH
Priority 4	LOW	LOW



6.2. Description of Stakeholders

Project Stakeholders are broken down into three categories:

1. **International stakeholders:** project stakeholders that are not based in Guinea.
2. **Regional stakeholders:** project stakeholders based in Guinea. Within regional stakeholders, CBG has identified vulnerable groups who stand to be disproportionately affected by the project and ill-positioned to benefit from it.
3. **Internal stakeholders:** stakeholders internal to CBG's operations or subcontractors.

6.2.1. Vulnerable Stakeholders

Vulnerable groups are groups that may find it more difficult to participate in the project or that may be affected differently or disproportionately by the project activities. There are different ways of measuring vulnerability. In addition to individual vulnerability (young, elderly, disabled, widows, etc.) household vulnerability - households are the commonly used socio-economic unit of reference within the framework of monitoring and evaluation. To measure vulnerability of households affected by the project, CBG analyzed different criteria: households in poverty (daily household income), female head of household, handicap level, demographic/inter-household and economic dependency ratios.

Special stakeholder engagement planning is required for these groups in order to tailor consultations to their specific needs.

Vulnerable groups have been identified during the elaboration of the project’s ESIA, RPF and MUOA LRP. These groups may vary during project implementation, which means that this list must be revised on a regular basis in order to ensure adequate consultation for them.

CBG presently uses the following definitions of vulnerability in order to identify vulnerable persons and households during the SEP implementation:

Table 3 – Vulnerable Stakeholders

Group	Subgroup
Vulnerable Stakeholders	Female and child-held households;
	Women’s groups (e.g. Market gardening groups);
	People with physical or intellectual disabilities;
	Households that do not own their place of dwelling;
	Landless households or those with limited land-access;
	Households with a Demographic Dependency Ratio (DDR) ³ ≥ 2 (2 dependants per person of working age);
	Households with an Economic Dependency Ratio (EDR) ⁴ ≥ 6 (6 inactives per employed person);
Households where the average revenue (monetary and non-monetary) is below the World Bank defined poverty line of \$1.25 USD.	

Note that the average revenue is not always information that is readily available.

With regard to fisheries and fishing activities, the ESIA found that the project would not materially affect fishing-based livelihoods. However, should CBG’s operations threaten to compromise fishing-based livelihoods, people practicing fishing and related activities will be specifically considered as potentially vulnerable people in the SEP implementation.

Note that there are no ethnic minority groups in the region and that there are no indigenous people as defined by the IFC.

³ This indicator makes it possible to highlight the weight of the household's dependents (a priori unable to work) on the other members of the household of working age. Elderly led households are considered in the DDR. This indicator highlights the weight of household dependents (presumably unable to work under 15 years old and older than 65 years old) on the other members of the household of working age (between 15 and 65 years old).

⁴ The EDR reflects the state of dependence of an inactive population on its active members. The RDE considers the unemployed, schoolchildren and students as well as all inactive persons of any age in the same household.

6.3. Key Concerns of Project Stakeholders

During the stakeholder mapping analysis, the main concerns of different stakeholders were analyzed. These concerns were related to the three project zones (port, rail and mine) for both project phases (construction and operations). Some concerns were identified as having higher impact than others but for the purpose of this section, it was decided not to make the distinction. Concerns are presented by priority groups of stakeholders. The list is sorted regarding the frequency (number of times the impact is mentioned for each priority group) and concerns have been listed by stakeholder priority group. The stakeholder map revealed four distinct quadrants: top right (high power, high impact), top left (high power, low impact), bottom right (low power, high impact) and bottom left (low power, low impact).

6.4.1 Priority 1 Stakeholders


Here are the 10 main concerns of the Priority 1 Group (top right quadrant):

- Job creation – operations;
- Unmet expectations - project benefit(s);
- Unmet expectations - local government;
- Increase in social inequity;
- Unmet expectations - consultation & communication;
- Livelihood restoration and income generating activities;
- Declining sanitary conditions;
- Increased noise;
- Changes to land management; and
- Water - access/quality.

6.4.2 Priority 2 & 3 Stakeholders

Here are the 10 main concerns of the Priority 2 Group (top left and bottom right quadrants):

- Water - access/quality;
- Job creation – operations;
- Job creation – construction;
- Increased crime;
- Community health and safety;
- Increased noise;
- Land loss; and
- Accidents – railway;
- Health services - access/quality; and
- Unmet expectations.

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6.4.3 Priority 4 Stakeholders

Here are the 10 main concerns of the Priority 4 Group (bottom left quadrant):

- Land loss;
- Job creation;
- Accidents - maritime area;
- Community development projects;
- Increase in social inequity;
- Unmet expectations;
- Livelihood restoration and income generating activities Declining sanitary conditions;
- Population displacement, and
- Electricity.


7. STAKEHOLDER ENGAGEMENT PROGRAM

7.1. Goal and Objectives

The goal of the SEP is to build and maintain constructive, strong and long term relationships with project stakeholders throughout the project life cycle, through timely provision of relevant and understandable information.

This goal can be attained through the achievement of the following specific objectives:

- Provide meaningful information on project activities, issues, challenges and constraints in a format and language that is readily understandable and tailored to the needs of the target stakeholder groups;
- Avoid misperceptions;
- Provide information in advance of consultation activities and decision-making;
- Identify issues before they become critical, thus avoiding conflict;
- Ensure visibility to stakeholders;
- Disseminate information in ways and locations that make it easy for stakeholders to access it;
- Plan and carry out engagement activities in full respect with local traditions, languages, timeframes, and traditional decision-making processes;
- Ensure an honest and transparent two-way dialogue that gives both sides the opportunity to exchange views and information freely, to listen, and to have their concerns heard and addressed;
- Ensure inclusiveness in representation of views, including women, vulnerable and/or minority groups;
- Ensure an engagement process free of intimidation or coercion;
- Maintain regular dialogue;
- Maintain social peace in order to facilitate CBG's activities;
- Create good conditions for cohabitation of CBG and its regional stakeholders;

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- Plan and disclose clear mechanisms for responding to people’s concerns, suggestions, and grievances;
- Promote maximum local benefits especially in terms of employment and procurement through effective disclosure of project related opportunities;
- Incorporate feedback into project design, and report back to stakeholders;
- Ensure regular monitoring and evaluation of project activities and impacts in order to be able to implement corrective measures when needed; and
- Meet the requirements of laws, regulations, the IFC, and industry best practices.

The SEP presented herein describes the methods that will be used to accomplish these objectives.

7.2. Principles of Stakeholder Engagement

The SEP was prepared on the basis of the following principles that comply with CBG’s HSEC policy as well as with the IFC’s performance standards:

- Participation: the participation of all local stakeholders during consultation will be ensured. Emerging and new stakeholder groups will be identified through the duration of the project operations. While power differences between stakeholders exist, CBG will strive to ensure that the voices of the most vulnerable are heard;
- Transparency and Trust: The SEP is based on trust and respect between stakeholders. This translates into a transparent and open approach to different cultural values and knowledge bases;
- Consistency: The various exchanges regarding different aspects of the expansion project (activities, recruitment and employment, community development) will be coordinated coherently, consistently and effectively in order to avoid contradiction, confusion, duplication and too many meetings;
- Cultural sensitivity and appropriate communication: Project information will be provided in appropriate forms to the stakeholders and will also take into account cultural sensitivities that each addressed group may have;
- Flexibility: The planning of SEP activities will be flexible in order to allow appropriate and diligent responses to changing needs and circumstances; and
- Continuous assessment: The effectiveness of the SEP will be evaluated regularly and the process will need to be adjusted if changes are made in the project activities, if new stakeholders are identified or if stakeholders express serious concerns regarding the project implementation.

7.3. Engagement Platforms

CBG will use different engagement platforms depending on the type and level of stakeholder engagement needed. The communications platforms will be used to solely disclose project related information and improve community awareness of key issues. Consultations platforms will be used in instances where stakeholder feedback and active participation is needed.

7.3.1. Consultation Platforms

Consultation platforms are as follows:


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Table 4 – Consultation Platforms

Platform	Description
Introduction Meetings	<i>Meetings held with regional and local authorities (ex. prefects, sub-prefects, mayors) to present and validate a consultation programme (subjects to discuss, consultation activities, stakeholder groups targeted).</i>
Public Consultations	<i>Public meetings with participation of multiple stakeholder groups held in public venues (i.e. community centres). Meetings generally consist of a formal presentation and question and answer period.</i>
Focus Groups	<i>Smaller meetings with specific stakeholder groups. Meetings are generally more discussion-based in order to solicit stakeholder input into CBG’s management of specific issues of community concern (i.e. planning of resettlement and compensation activities).</i>
Committees	<i>Committees meeting on a regular basis with specific stakeholder groups. Committees’ meetings are discussion-based and usually permit to follow-up operations or a specific situation. Committees can be permanent or temporary. Temporary committees are appointed for a specific purpose and have a short term existence.</i>
Individual Consultation Meetings	<i>One-on-one meetings with affected stakeholders on specific issues of concern (i.e. discussing a specific grievance and the management thereof).</i>

7.3.2. Communications Platforms

Communications platforms are as follows:

Table 5 - Consultation Platforms

Platform	Description
Information Meetings	<i>Similar to public meetings with participation of multiple stakeholder groups. Meetings aim at transmitting information and are often used in ESIA studies as a pre-cursor to public meetings and focus groups to provide project related information to stakeholders and allow them time to consider it before participating in consultation.</i>
Awareness-raising Activities	<i>The meetings can be held with an individual stakeholder group or with a broader group and aim at behaviour change (i.e. raising awareness of behaviours and practices to improve safety related to rail crossings).</i>
Radio CBG	<i>CBG’s radio network. Generally used for transmitting project related information and raising awareness on public health and safety issues.</i>
Other Radio Channels	<i>Other radio broadcasters in the project zones and more broadly in Guinea. Generally used for transmitting project related information and raising awareness on public health and safety issues.</i>

Platform	Description
Television	<i>Television stations in Guinea. Generally used for transmitting project related information and raising awareness on public health and safety issues.</i>
Newspapers	<i>Newspapers in the project zone and more generally Guinea. Generally used for transmitting project related information and raising awareness on public health and safety issues.</i>
CBG Website	<i>CBG's official website. Generally used for transmitting project related information.</i>
CBG on social media (i.e Facebook, LinkedIn Pages)	<i>Used for disclosure information on the project.</i>
Mail	<i>Used for communication with individual stakeholders – generally authorities or internal stakeholders.</i>
Email	<i>Used for communication with individual stakeholders – generally authorities or internal stakeholders.</i>
Billboards	<i>Large billboards on the side of roads. Generally used for transmitting project related information and raising awareness on public health and safety issues.</i>
Posters	<i>Posters placed in public places such as mayor's offices or community centres. Generally used for transmitting project related information and raising awareness on public health and safety issues.</i>

7.4. Engagement with Women and Vulnerable Groups

Development projects may affect stakeholder groups differently and the various stakeholders may have different priorities or perspectives on key issues. For example, because of women's and men's clear roles in Guinean society, these two groups may be impacted differently and may also have different concerns regarding the project. Moreover, vulnerable groups may be affected by a project in a more pronounced way than other stakeholders.

Inclusiveness in representation of the views of women, men, elders, youth and vulnerable groups is essential in ensuring that their specific views, needs and concerns are well heard and incorporated in the project's design and implementation.

In order to ensure the participation of women and vulnerable groups (as defined in section 6) within the SEP implementation, CBG will conduct specific engagement activities with these groups and will provide assisted transport to the meetings to the elderly, the people with disabilities or to people with no means of transportation.

During the SEP implementation, CBG will conduct specific consultations to these groups through women-only focus groups and focus groups with vulnerable people only. These focus groups will offer a place where women and vulnerable groups can openly express their specific concerns about the project.

8. GRIEVANCE, COMMITMENTS AND COMMUNITY REQUESTS MANAGEMENT

8.1. Grievance Management Procedure

CBG has developed a Grievance Procedure and implemented a grievance mechanism that aims at ensuring the reception and treatment of grievances related to specific projects or to general operations within defined timeframes..

8.2. Commitments Management

Following through on commitments made to project stakeholders during the various consultation activities is key to establishing solid relations of trust between CBG and the project's key stakeholders.

Many questions can arise during consultation or information sessions. Some questions can be answered immediately while others need further investigation in order to be adequately addressed. CBG has established a Commitments Management Approach that aims at addressing commitments made to stakeholders.

8.3. Community Requests Management

In line with its Corporate Social Responsibility policy, CBG undertakes voluntary community investments in order to maintain good collaboration relations with the local communities of its area of intervention. As such, CBG works to respond to community requests for support based on needs expressed at consultation events.

CBG has established a Community Requests Management Approach that aims at addressing as appropriate the requests expressed. Community requests may pertain to sanitation needs, grading or opening of access roads for example.

9. MONITORING AND REPORTING


9.1. Participative Monitoring

Stakeholder involvement in monitoring the implementation of mitigation measures is key to strengthening stakeholder confidence in the management of project impacts. Moreover, the transparency gained from this type of participative monitoring can empower stakeholders and build trust between them and the CBG.

Thus far, many implementation plans have been prepared as part of the expansion project, under the Environmental and Social Management Plan (ESMP) and are applied to all CBG operations. These plans contain monitoring measures, some of which can be carried-out with the involvement of the concerned stakeholders.

In some instances, stakeholder participation can consist of ensuring the presence of local stakeholders at the time the monitoring takes places.

As part of all the activities that CBG undertakes with the communities, stakeholders participate in the process (resolution of complaints, grievances, community programs, monitoring activities and land rehabilitation). Meeting's reports and attendance lists attest of the transparency and participation of communities.

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9.2. Reporting

9.2.1. Reporting to Affected Communities

Reporting back to project-affected communities is essential in building mutual trust. Many consultations activities have and will take place in the course of the project and affected communities will want to know if their concerns and suggestions, shared during these activities, have been taken into account in the project design. The affected communities will also want to know if the project has planned appropriate mitigation measures and how project impacts will be monitored.

CBG will continue to report back to stakeholders subsequent to consultations in the following ways:

- Project impact assessment studies: results workshops with affected stakeholders subsequent to the completion of ESIA's to present impacts and validate mitigation and monitoring measures;
- Other consultation activities:
 - Respond to community complaints through the complaint's management process;
 - Respond to community questions through the commitment's management approach;
 - Respond for community requests for support from CBG through the community requests management process.

CBG also intends to improve communication and reporting to stakeholders in the following ways:

- Continue to collect and compile data (i.e. social baseline) to compare the baseline and the actual data for communicating adequately about the project progress, its performance and the application of mitigation measures;
- Improve and/or develop adapted tools; and
- Organize public reporting activities (i.e Consultation Framework "Cadre de concertation").


9.2.2. Internal Reporting

CBG's internal reporting is carried out through the following actions:

- Monthly Reports : These reports mention the main activities carried out by the Community Relations Department and provide details regarding meetings, engagement activities with the communities, community projects advancement, community investment program, grievance monitoring, etc.
- Annual Reports : The annual report will be based on the monthly reports and will therefore include the same type of information. However, annual reports will provide summaries and general conclusions regarding public consultation issues, types of registered grievances, implemented resolutions and strategies for improvement.

9.2.3. Reporting to Lenders

CBG has committed to reporting annually to project lenders via the annual monitoring report (AMR) on ongoing public consultation with and disclosure to its stakeholders regarding environmental and social aspects of the project.

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10. MANAGEMENT REVIEW & SEP UPDATE

It is important to review and update stakeholder information over time, especially if there are significant changes in the external environment that may result in the emergence of new stakeholder groups, or that may influence or impact the existing stakeholder groups.

Here are some examples of potential triggers for reassessment of SEP strategy and key project stakeholders:

- Existing project activities change and affect the SEP;
- New project activities commence and affect the SEP;
- Repeated complaints regarding a specific issue or project activity;
- The arrival of new projects near the project area that may directly impact the project or contribute to increased concerns regarding cumulative impacts.
- Changes in attitudes towards the CBG; and
- Adverse socio-economic trends, natural disasters or other developments that were not caused by the project but that may worsen the condition of the project's vulnerable stakeholders.

The present SEP document will be updated annually via the annual SEP action plan. However the present SEP in itself will also be updated every two years.

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