

Intended for

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

together, the Original Lenders and other Lenders as defined in the common terms agreement dated 02 September 2016 (as amended and restated on 06 September 2017, and as further amended and restated from time to time) to be entered into between, among others, the Original Lenders, the Bank of New York Mellon and Compagnie des Bauxites de Guinée from time to time (the "Common Terms Agreement").

Date

**September 2022**

Project Number


**1620009030-003**

# **CBG BAUXITE MINE ENVIRONMENTAL AND SOCIAL MONITORING REPORT – MARCH 2022**

**CBG BAUXITE MINE  
ENVIRONMENTAL AND SOCIAL MONITORING REPORT  
– MARCH 2022**

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Site Visit itinerary

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Photolog

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Status of Issues Identified in Preceding Monitoring Visits

### Appendix 4

Status of ESAP items (as of May 2022)

## ACRONYMS AND ABBREVIATIONS

AIDS	Acquired Immune Deficiency Syndrome
AGEE	Agence Guinée des Évaluations Environnementales (Guinean Agency for Environmental Assessments)
AMR	Annual Monitoring Report
ASI	Aluminium Stewardship Initiative
BAP	Biodiversity Action Plan
BGEEE	Bureau Guinéen d'Études et d'Évaluation Environnementale (Guinean Office of Environmental Assessment Studies)
BMS	Biodiversity Management System
BuMS	Burner Management System
CAO	Compliance Advisor Ombudsman
CBG	Compagnie des Bauxites de Guinée
CDP	Community Development Plan
CECI	Centre d'Etude et de Coopération Internationale ( <i>the NGO managing all livelihood restoration activities, under the Hamdallaye and Fassaly Foutabhé RAP, on behalf of CBG</i> )
CFB	Chemin de Fer de Boké
CHMP	Cultural Heritage Management Plan
COBAD	Compagnie de Bauxites et d'Alumine de Dian Dian
COMBO	Conservation, Mitigation and Biodiversity Offset
CR	Community Relations
CRPF	Compensation and Livelihood Restoration Policy
CSOs	Civil society organisations
CTA	Common Terms Agreement
DFC	Development Finance Corporation
DMP	Dredging Management Plan
EHS	Environment, Health and Safety
EMTL	Environmental Monitoring Team Leader
EMPs	Environmental Management Plans
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GAC	Guinea Alumina Corporation
GIE	Economic Interest Group
GIS	Geographic Information System

GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (German Agency for International Cooperation)
GM	Grievance Mechanism
GoG	Government of Guinea
GPS	Global Positioning System
ISO	International Organisation for Standardisation
Ha	hectare
HIV	Human Immunodeficiency Syndrome
HR	Human Resources
HSE	Health, Safety and Environment
HSE&S	Health, Safety, Environment & Social
HSECQ	Health, Safety, Environment, Communities and Quality
H&S	Health and Safety
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
KBA	Key Biodiversity Area
KPIs	Key Performance Indicators
LDP	Land Disturbance Permit
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan
MoC	Management of Change
MRCCP	Mine Rehabilitation and Conceptual Closure Plan
MS	Management System
MUOA	Multi-User Operator Agreement ( <i>regarding the railway capacity expansion project</i> )
MS	Management System
NoCo	North of Cogon
NO <sub>x</sub>	nitrogen oxides
NGO	Non-Governmental Organisation
NMCP	National Malaria Control Programme
N&V	Noise and Vibration
NVMP	Noise and Vibration Management Plan
PAP	Project-Affected Person
PbP	Plateau by Plateau
PRAMS	Income Generating Activities Programme
PS	Performance Standard
RAP	Resettlement Action Plan
REB	Réseau Environnement Bauxite (The Bauxite Environment Network)
RfPs	Requests for Proposals

SEP	Stakeholder Engagement Plan
SMB	Société Minière de Boké
SMPs	Social Management Plans
SOP	Standard Operating Procedure
SO <sub>2</sub>	sulphur dioxide
ToR	Terms of Reference
TMP	Transitional Measures Plan <i>(of the MUOA Project)</i>
VFD	Variable Frequency Drive
VSV	Virtual Site Visit
WBG	World Bank Group
WMF	Waste Management Facility
WMP	Water Management Plan
WWTP	Wastewater Treatment Plant

## EXECUTIVE SUMMARY

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

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

The IESC's scope of work allows for two in-country monitoring visits each year during the construction of the Phase 1 Expansion Project and/or during the construction of the Sangarédi to Kamsar Railway Upgrade Project associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes the monitoring of health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG's Health, Safety, Environment, Communities and Quality (HSECQ) Department and are managed under the same E&S management system. This report provides the findings of an in-country site visit undertaken in March 2022.

A series of inspections, meetings and interviews were undertaken during the week commencing 28<sup>th</sup> February 2022. The meetings/interviews were held in person and involved representatives from the IESC, CBG, CBG contractors, stakeholders and the IFC. In addition, following its return from Guinea, the IESC was able to draw upon the information contained in CBG's 2021 Annual Monitoring Report (AMR), received in April 2022.

During the site visit, the following topics were of primary focus:

- HSE&S:
  - The implementation of the Environmental and Social Action Plan (ESAP);
  - The adequacy of the HSE&S Management System(s);
  - The Management of Change Procedure;
  - The implementation of the suite of E&S management plans intended to address applicable Project Standards, notably the IFC Performance Standards on Environmental and Social Sustainability (2012);
  - Follow-up on those 'open' issues identified during previous site visits;
  - Contractor management;
  - Environmental management (air, water, waste, hazardous materials, noise and vibration);
  - Dredging;
  - Resource use and energy efficiency; and
  - North of Cogon (NoCo) exploration;
- Labour and working conditions:
  - Occupational health and safety;
- Stakeholder engagement:
  - Community Relations Team (staffing and resources);
  - Scope and focus of stakeholder engagement;
  - Female participation in stakeholder engagement meetings;
  - Management of community grievances; and



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- Management of community requests for assistance (doléances);
- Community health and safety:
  - Blasting Protocol;
  - Communicable disease prevention;
  - Health infrastructure;
  - Security; and
  - Rail and community health and safety;
- Biodiversity:
  - Biodiversity inspections including rehabilitation;
  - Biodiversity Action Plan;
  - Five-year Land Rehabilitation Plan;
  - Offsets (off-site); and
  - CBG supervision/monitoring of the Société de Minière de Boké (SMB) railway<sup>1</sup> and the Compagnie de Bauxites et d'alumine de Dian Dian (COBAD) Road;
- Resettlement issues:
  - Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP) implementation status;
  - Livelihood Restoration Plans (LRPs);
  - Cumulative impacts;
  - Monitoring; and
  - Resettlement implementation capacity.

A list of High and Moderate significance findings are described below which provide specific examples of areas needing attention that were identified by the IESC during the March 2022 site visit. Many of these are repeat findings/are similar in nature to early findings and it has become apparent over the course of multiple IESC monitoring events that many findings result from systemic issues. These systemic issues, each of which are considered to be of the Highest significance in their own right, are described below.

#### *HSECQ reliance on other CBG Departments/decision-makers*

The HSECQ team has historically taken on primary responsibility for a large range of E&S issues. Whereas the HSECQ Departments role as the lead entity makes sense, it is apparent that the HSECQ is heavily reliant on other CBG departments, for example, the Maintenance and Procurement Departments, when implementing the actions prescribed in the various E&S Action Plans. These other departments may have other non-E&S priorities, such that time critical requests from the HSECQ Department might be deprioritised. In such situations, the HSECQ Department is required to escalate requests to a Senior Management level. To date this practice of escalation has largely occurred on an ad-hoc basis, although in recent months it is noted that Senior Management are now involved in periodic (monthly/quarterly) steering committee meetings concerning the implementation and prioritisation of E&S Action Plans as part of a transition to new working practices outlined in the 'Road Map' (discussed later in this report). This approach provides a more formalised approach to prioritisation of time critical actions and ensures continuous support of Senior Management. The IESC welcomes the initiative and encourages CBG to sustain personal involvement of Senior Management, including the Director General and Operations Director. As a relatively new change in practice its success will be monitored in coming IESC site visits.

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<sup>1</sup> A Memorandum has been signed between SMB, CBG, the Ministry of Mines and Geology and the Ministry of Environment, Water and Forests, with respect to the 10 km of railway SMB is constructing in the CBG Concession Area (South of Cogon). Under this agreement, CBG undertakes regular inspection reports, which focus upon SMB's performance against the applicable HSECQ standards, which are then submitted to BGEEE (Bureau Guinéen d'Études d'Évaluation Environnementale) (the agency under the Ministry of Environment, Water and Forests). Only BGEEE (now the AGEE) has the right to enforce compliance.

### *Procurement Department*

The IESC has previously reported on numerous delays resulting from the procurement of goods and services. Whereas procurement often requires the import of goods, which affects timeframes for receipt of goods, the procurement process has nevertheless been found to be very slow. Delays associated with procurement have been noticeable in relation to procurement of sampling equipment (for environmental monitoring), consumables (for livelihood restoration) and appointment of consultants/service providers. The IESC therefore recommends a detailed review of CBG's current procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services.

### *Maintenance Department*

The HSECQ Department is highly reliant on the services of the Maintenance Department where there is a need to repair, install or commission equipment. The IESC recommends mechanisms are established to ensure the Maintenance Department has a comprehensive understanding of HSECQ time-critical issues and a shared responsibility/understanding of urgency and is accountable to Senior Management. Similar to the recommendation above, the IESC reiterates that the newly appointed Operations Director maintains an involvement in prioritisation of HSECQ related actions that require support from the Maintenance Department. From the March 2022 site visit the IESC understands this is the intention.

### *Organisational capacity and resourcing levels*

The IESC has made recommendations to increase HSECQ resourcing levels on several occasions. These recommendations have been accepted by CBG and review of resourcing levels is embedded in CBG's E&S management system. However, the IESC is of the opinion that the HSECQ teams are generally stretched and there is a high dependency and workload on a relatively small number of decision-making individuals. The combined affect is that progress on E&S matters is hindered and heads of teams are often distracted by the detail/competing demands instead of focusing from strategic decision-making/systemic improvements. Further effort is required to ensure team leaders are able to delegate responsibilities and have sufficient 'head space' to make strategic decisions. Furthermore, the HSEC Director role is currently being fulfilled by the Deputy HSECQ Director. The position of HSECQ Director should be filled with an experienced HSECQ professional with a robust working knowledge of Good International Industry Practice and a proven track record in improving environmental and H&S culture and performance on other similar projects.

### *Safety culture*

Despite the launch of the training programme and the significant involvement of the HSE team there still seems to be poor safety practices/lack of awareness of poor practice in some areas. The issues identified in this Monitoring Report are indicative of a safety culture that does not flow down to all individuals at CBG's facilities. Further efforts are required to train, incentivise good practices and reinforce the 'safety first' message. Where necessary, disciplinary measures should be imposed for intentional breaches of safety rules. Chapter 6 of this report makes detailed recommendations to improve safety performance on topics relating to: leadership, commitment and communication; training; incident investigations & root cause analysis; asset management and maintenance; and risk management control of work.

A total of 37 new or updated findings (with accompanying recommendations) were identified during the March 2022 site visit. Of these, 14 are considered to have a 'High' significance, 19 are of 'Moderate' significance and the remainder are of 'Minor' significance. The High and Moderate findings highlight those with relatively high/moderate risk of significant harm/non compliance and the timing/urgency of actions needed to mitigate the actual/potential harm. In some instances, High and Moderate findings are repeats of the same or similar findings made in previous IESC monitoring reports. Where this is the

case, repeat findings are indicated with an asterix (\*). Any change in the significance of an issue is also highlighted, where such a change is applicable.

### High significance findings

1. \* *Management of Change*. Limited progress has been made in terms of the wider understanding and implementation of the MoC Procedure since the previous IESC Monitoring Report. CBG should continue to finalise the MoC Action Plan and roll out the measures therein as a matter of priority. The IESC recommends that systems are put in place to make adherence to the management of change procedure mandatory and that going forward the Operations Director has ultimate responsibility for its implementation.
2. *Risk Management and Control of Work*. The IESC identified insufficient control of OHS risks during the execution of tasks, including in relation to blasting operations, surface miner, traffic on the mine, railway, waste storage (at Torabora) and lifting operation on jetty in Kamsar Plant. Several recommendations are made in this report relating to: more-structured control system (for blasting); need for onsite HSE documentation; physical separation of hazard and humans, improved signage, training and supervision, communications, responsible parties for issuance of safety permits, use of safety equipment and maintenance of risk registers.
3. *Incident Investigations & Root Cause Analysis*. Greater efforts and resource capacity of investigation team should be provided for the investigation and subsequent timely close out of pending actions arising out of the 2021 significant incident investigations. CBG should define the composition of the team in charge of incident investigations (and train them) and should ensure prompt closure of corrective actions following approval of incident investigation reports.
4. *Maintenance & Asset Management*. The IESC observed poor maintenance of equipment (including equipment that could affect safety). CBG should review maintenance and asset integrity in detail (including electrical installation and moving/rotating equipment) and develop an asset replacement and/or life extension management strategy for aging assets and equipment where safety and reliability could be compromised.
5. *Contractor HSECQ Management*. CBG should finalize the Contractor Management Plan and support contractors in their continuous improvement approach. More specifically:
  - a. Finalise the contractor management plan and the capability assessment of contractors.
  - b. Ensure HSECQ Minimum Requirements are captured in all new and extended contracts
  - c. Systra should digitise the tracking of actions and assign levels of importance to impose an appropriate time for the correction of actions and possible associated sanctions (with the highest level being to stop work).
6. \* *Air Quality*. CBG was unable to complete wet season stack emission testing in 2021 as a result of COVID-19 and security travel restrictions. Consequently, it is unable to meet the timeframes specified in the ESAP, Item 13, for finalisation of the AQMP. CBG and Lenders need to formally agree the steps needed and a revised timeframe for the update of the AQMP, inclusive of agreed dryer stack emission limits. CBG should use all reasonable efforts to expedite finalisation of the AQMP. The IESC therefore recommends i) early appointment of an engineering design consultant and ultimate responsibility for completion of the AQMP to sit with the Operations Director.
7. \* *Oil water separator, Kamsar*. Whereas material progress has been made in identifying and initiating a solution, the oil concentrations in treated effluent remain above Project Standards at the time of the site visit.
8. \* *MUOA Project/railway safety*. Delays in the installation betafence and footbridges have resulted in ongoing risk of serious injuries/fatalities involving community members in urban areas. Liaison with the Procurement Department is required with respect to delays in the procurement process and

measures to expedite procurement. Once fencing is in-country, fence erection should be prioritised at those high-risk areas where footbridges have been completed.

9. \* *Hamdallaye Resettlement Site (formal land title)*. While residential and agricultural land at the Hamdallaye resettlement site has been allocated by CBG, this process has not been concluded with the issuance of formal land titles to PAPs by the relevant State agencies. CBG to launch the land tenure formalisation and securitisation process; in this context, liaise with neighbouring mining operations (e.g. GAC) to understand how they obtained security of tenure for the PAPs.
10. \* *Fassaly Fouthabé (school)*. A school was constructed as per the RAP but remains unstaffed. While continuing to liaise with the local education directorate to obtain allocation of teachers for the school, CBG should also explore alternative avenues with the community (e.g. "maîtres communautaires").
11. \* *Fassaly Fouthabé (cumulative impacts)*. Cumulative impacts to the community are potentially high and may become difficult to mitigate. CBG should prepare a long-term assessment of the situation of mining and hauling cumulative impacts around Fassaly Fouthabé and consult with the community.
12. *Hamdallaye and Fassaly Fouthabé RAP (Livelihood Restoration)*. Current Livelihood restoration activities do not meet their intended objectives. CBG has already taken steps towards a comprehensive corrective action plan for all livelihood restoration activities in both locations, and should:
  - a. take a broader perspective of the evolution of both communities (particularly the urbanisation of Hamdallaye);
  - b. account for generational gaps between older and younger people;
  - c. seek better integration between livelihood restoration and CBG's procurement and recruitment needs;
  - d. revisit the premises of gardening activities;
  - e. revisit the principles of the poultry projects and prioritise sustainability over productivity;
  - f. revisit the goat projects or consider abandoning them;
  - g. update the action plan for the grasscutter projects;
  - h. provide a revolving fund to the bakery project or other substantial material support;
  - i. introduce a stronger business development component;
  - j. establish strong day-to-day CBG oversight of the implementing partner; and
  - k. formalise all of the above in an update to the Hamdallaye and Fassaly Fouthabé RAP.
13. *Thiapikouré, Kankalaré, and MUOA LRPs* are about to be contracted to implementation partners. CBG should review and revisit, as warranted, livelihood restoration activities in light of the recommendations pertaining to the Hamdallaye and Fassaly Fouthabé RAP livelihood restoration activities.
14. \* *Resources for resettlement implementation*. The capacity of the CBG Resettlement Team remains weak with regards to the tasks at hand. It is recommended that CBG:
  - a. continue to increase staffing within the Resettlement Team with a focus on livelihood restoration;
  - b. create a monitoring and evaluation / data management function within the Resettlement Team;
  - c. seek to establish a better gender balance within the Resettlement Team, and train staff members (both male and female) on basic gender sensitivity;

- d. seek better integration of the CR and Resettlement Teams; and
- a. clarify positions and titles within the Resettlement Team and secure a long-term Resettlement Manager with the authority and responsibility for leading the team.

### **Moderate significance findings**

1. *Home office location of Community Relations (CR) Team.* The distribution of CR Team members is not reflective of the Team's workload which is largely based in Sangarédi. A greater proportion of the Team should be based in Sangarédi, including some senior positions.
2. *\* Isometrix database.* The database is not functioning properly and thus hindering CBG's ability to effectively manage the volume of data it generates. The purchase and installation of a dedicated server in Kamsar is now considered to be a priority in order to alleviate performance issues related to the Isometrix database.
3. *\* Appointment of a permanent Resettlement Manager.* The CR Manager has been appointed on a temporary basis to act as Resettlement Manager. CBG has appointed a specialist resettlement consultant to alleviate some of the workload, but nevertheless the absence of an employed Resettlement Manager has translated into an increased workload for the CR Manager. The recruitment of a permanent Resettlement Manager is needed to relieve the CR Manager's workload.
4. *Stakeholder Engagement Plan Grievance Management Mechanism.* A revised SEP drafted by CBG for the period 2022-2025 was intended to be disclosed in early 2022. Review of documents by the relevant parties has held up finalisation of the SEP and must be accelerated to enable rapid disclosure of the 2022-25 SEP thereby replacing the currently disclosed version which is increasingly outdated.
5. *OHS, management of leading indicators.* Opportunities for better management of leading indicators (near misses and safety observations) have been identified. Specifically:
  - a. Classification of OHS events - CBG should disaggregate the data on high potential near misses from safety observations to provide an accurate report on actual near misses and to track trends for these events.
  - b. Leading indicators - CBG should identify and track a suite of leading indicators (e.g. events with high severity potential, completion rate for mandatory training, closure rate for corrective actions, number of near misses) that provide a clear understanding of safety-related issues before they develop into significant incidents.
6. *OHS, Training.* The training management tool is not adapted to CBG's needs; there is no system for tracking out-of-date certifications and training courses and the tool used to monitor training is basic. There is no formal verification of trainees' understanding at the end of safety induction training. These deficiencies should be addressed as follows:
  - a. Training management – Establish an appropriate system or more efficient tool (e.g. automatic reminders for refresher training, tracking out-of-date certifications, list of employees eligible for training based on roles). This will ensure that only personnel with up-to-date certification and training are assigned to perform critical operational and maintenance tasks.
  - b. Golden Rules and safety inductions – The Golden Rules should be presented at all safety inductions and periodically to both direct employees and contractors/subcontractors. Safety inductions, like all internal and external training exercises, must be verified by a Q&A or a comprehension test at the end.
  - c. The training plan should include specific training for OHS Teams and for Managers.
7. *Leadership, Commitment and Accountability.* Since March 2021, findings indicate that there has been limited improvement of the management system. CBG should exert further efforts in committing to

create an organisational culture that values health and safety. Specific recommendation to help achieve this goal relating to inspection registers, SMART performance objectives and responsibilities, safety share and H&S communications are provided in the main body of this report.

8. \* *Environmental Monitoring Programme*. Progress has been made with respect to finalisation of contractual agreements with all laboratory services providers and dispatch of samples for analysis. Additional monitoring equipment has also been received. However, CBG has been unable to implement its Environmental Monitoring Programme in full for a number of reasons. Further effort is required to ensure full implementation of the EMoP and monitoring components of the environmental management plans, including the repair of fixed AQ monitoring station. Other priorities to be addressed include: disclosure of monitoring results to affected communities in an appropriate and meaningful format; procurement of essential equipment and consumables; and procurement of a data management system.
9. *Air Quality – fugitive dust emissions*. An evaluation of dust suppressants has been ongoing for several months. Dust generating activities are an inherent issue for CBG’s activities both at the mine and port locations. CBG should expedite studies into the use of commercial dust suppressants and explore opportunities to use these and other techniques to further reduce fugitive dust emissions including:
  - a. efforts to minimise large accumulations of dust at the Kamsar processing facilities, and
  - b. application of dust suppressants at Kamsar evaluated following completion of the ongoing dust suppressant study
10. \* *Sangaredi WWTP*. A new UV treatment plant at the Dounsey WWTP has been commissioned, however coliform bacteria are still being detected in the outfall. Also, a contractor has been identified to empty sludge tanks however this is a long overdue action. Moving forward, performance of the UV treatment plant should be investigated and optimised (as is the current CBG intention). Emptying of the sludge tank should be prioritised and any performance improvement at the WWTP recorded.
11. *Surface water discharge – Kamsar*. Elevated COD levels and suspended sediments were recorded in surface river water surrounding the Kamsar processing facility. Surface water discharge channels (fed by dewatering of the primary crusher pit), that were heavily laden with fine sediments, were observed discharging to the River Dougoufisa with no apparent sediment trap in place. The causes of elevated levels of contaminants should be investigated and where found to be a result of CBG’s activities, actions to identify the source of contaminants/ improve quality of discharge should be identified.
12. *N&V impacts*. Noise levels taken from various rail and mine sampling locations are generally high, however it is not clear whether the noise is generated by CBG activities or other background sources unrelated to CBG’s activities. Further interpretation of N&V monitoring results is required, particularly where there are apparent exceedances of Project Standards, to determine whether noise levels are attributable to CBG activities and therefore require mitigation. Measured results should also be compared with background levels and the 3 dB increase above background limit, allowed for in the Project Standards, taken into consideration when assessing compliance with the applicable standards. Factors influencing noise levels, including both CBG noise and other noise sources should be described and used to define any corrective actions where necessary.
13. \* *Airblast overpressure*. The Project Standard for airblast overpressure was regularly exceeded prior to January 2022. Further interpretation of airblast overpressure results is needed in order to understand the relationship between blast charge, stemming practices, meteorological conditions and proximity of communities, as the factors leading to exceedances/opportunities in order to avoid future exceedances.
14. \* *Waste management*. Progress with the design and construction of the two waste management facilities remains slow. During the site visit, workers’ facilities were found to poor at Tora Bora. A

containerised office facility, that would also provide a workers' refuge, had not been commissioned. At the Sangaredi facility waste was found to be burning. The root cause of the slow progress, which likely includes a lack resources and reliance on Procurement and Maintenance Departments in CBG, should be identified. The commissioning of the office at Tora Bora should be prioritised. CBG's Senior Management should step in if the HSECQ Department is being deprioritised. The cause of fires at Sangaredi waste facility should be investigated and steps taken to eliminate further fires/burning of waste in the future.

15. *MUOA Project, erection of fences.* There is a risks of community opposition to betafence and footbridge installation due to unrealistic expectations of associated employment opportunities prior to their installation/construction and the short-term impact of the betafence once erected on the daily life of inhabitants, especially in Kamsar. Thus, there is a need for close liaison in installation of fencing (between the CFB and CR teams) to avoid community opposition and manage employment-related expectations among communities. Also, further engagement with the affected communities is recommended when betafence and footbridges are installed to evaluate the degree of acceptance of these features, particularly given the time elapsed since the original engagement programme on this matter, and to determine whether additional measures are required in order to avoid opposition, maintain social cohesion and ensure access to basic infrastructures on both sides of the railway.
16. *Hommes Piquets (flagmen) – the IESC found that hommes piquets stationed along the railway lacked the necessary information and authority to perform their duties effectively. They should be provided with access to information, for example train schedules, better trained and more aware of emergency procedures and their roles and responsibilities. They should also be provided with a means to communicate with train drivers in the event of a hazard or accident on the railway.*
17. *\* Hamdallaye Resettlement Site (drainage).* Drainage issues have been partially fixed but some problems remain, resulting in localised flooding, with potential damage to structures. CBG should monitor potential flooding during the rainy season and plan corrective works accordingly
18. *Hamdallaye Resettlement Site (waste).* There is a lack of satisfactory waste collection at Hamdallaye Resettlement Site. CBG should therefore support the establishment of a sustainable solid waste collection and elimination system and engage the Hamdallaye Resettlement Committee and community members in this respect.
19. *Hamdallaye Resettlement Site (community requests).* There are numerous requests from the Hamdallaye Resettlement Committee with respect to community infrastructure that are not aligned with CBG's intentions. CBG should therefore manage certain unreasonable expectations from the Hamdallaye Resettlement Committee with respect to community infrastructure, strengthen management capacity, and finalise handover accordingly, based on clear and consulted upon modalities.

As indicated above, 'Low' significance issues are not summarised in this Executive Summary, but instead can be found in the summary tables of chapters 5 to 11 Findings made in previous reports that are not updated in this report, including Low significance findings, are presented in Appendix 3 with a status update as necessary. Appendix 3 therefore provides a consolidated list of issues identified during previous monitoring visits that either remain 'Open', have been 'Closed' or 'Superseded' since the last previous report. Of note, out of 42 findings made in the October 2021 site visit report, 10 have been closed with the remainder either remaining open or superseded/updated. A further 15 findings that predate the October 2021 report have also been closed since the previous site visit.

A number of High and Moderate findings detailed in this report repeat the findings made in previous IESC monitoring reports. The table below provides a visual summary of these repeat findings and the change in significance rating over time. These key findings will be revisited in subsequent monitoring cycles to track progress in the closure of findings.

### Tracking of repeat high and moderate significance issues

<b>Issue description</b>	<b>July 2019</b>	<b>July 2020</b>	<b>Mar 2021</b>	<b>Oct 2021</b>	<b>Mar 2022</b>
<i>H&amp;S performance/culture</i>	-	M	-	H	H
<i>Procurement delays</i>	-	H	H	H	H
<i>Management of Change – poor implementation of MoC procedure</i>	-	-	M	M	H
<i>Air Quality– closure of ESAP#13</i>	H	H	-	H	H
<i>MUOA Project/railway safety- installation of betafencing and passerelles</i>	-	M	H	H	H
<i>Hamdallaye resettlement – security of land tenure</i>	M	M	M	M	H
<i>Fassaly Fouthabé (school) – allocation of teachers</i>	-	-	M	M	H
<i>Fassaly Fouthabé (cumulative impacts) on affected/displaced communities</i>	-	-	M	H	H
<i>Resources for resettlement implementation</i>	-	H	M	H	H
<i>Isometrix database</i>	-	-	-	M	M
<i>Environmental Monitoring Programme</i>	-	H	H	M	M
<i>Oil water separator, Kamsar</i>	M	M	H	H	H
<i>Airblast overpressure</i>	-	-	-	M	M
<i>Waste management</i>	-	-	M	M	M
<i>Hamdallaye Resettlement Site (drainage).</i>	-	M	M	M	M

### Scope Limitations and Exceptions of the Assessment

The IESC has performed this monitoring audit in accordance with the scope of services outlined in its contract (CBG-5G-EXP1-019-G-S – Amendment No. 007-V1), signed in January 2022.

Throughout the March 2022 site visit, CBG cooperated fully and responded to the IESC's requests in relation to its monitoring work. The IESC and its reporting is not subject to any material limitations,



however, the findings expressed in this report are based primarily on information gathered at a moment in time during the site visit. The IESC focused on priority issues at the time of the site visit. Lower priority issues, which are not addressed in this report, can be considered in subsequent IESC monitoring visits.

## 1. INTRODUCTION

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

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

The IESC's scope of work allows for two in-country monitoring visits each year during construction of the Phase 1 Expansion Project and/or during the subsequent Sangarédi to Kamsar railway upgrade project associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes the monitoring of health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG Health, Safety, Environment, Communities and Quality (HSECQ) Department and are managed under the same E&S management system. This report provides the findings of the in-country monitoring visit undertaken in March 2022, including site inspections, meetings with CBG representatives, CBG's contractors and other stakeholders. At the time of the site visit, CBG's 2021 Annual Monitoring Report was not available for review; however, the IESC was able to draw upon the information contained in the Borrower's Quarterly E&S Compliance Certificate for Q4 and 2021 and subsequently CBG's AMR in the preparation of this report.

Preceding visits in July 2020, March 2021 and October 2021 had been undertaken as Virtual Site Visits (VSVs) due to a combination of COVID-19 and security-related travel restrictions in force at the time.

This report provides the findings of the March 2022 site visit, focusing on CBG's HSE&S performance against Project commitments made in E&S Management Plans, the Environmental and Social Action Plan (ESAP), loan agreements and applicable Project Standards, specifically the IFC Performance Standards on Environmental and Social Sustainability (2012) and applicable World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines.

Given the in-country nature of the site visit in March 2022, the IESC was able to visit CBG's facilities and conduct face-to-face meetings/interviews with stakeholders, including the affected communities, and also to inspect facilities and working areas for ground-truthing purposes. The IESC was able to hold detailed technical discussions with CBG representatives and its contractors. Such meetings were held, primarily, with CBG staff from the HSECQ department as follows:

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

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

- Mining Department;

- Phase 1 Expansion Project (in relation to Dryer 4); and
- Chemin de Fer de Boké (CFB) in relation to the MUOA Project.

A team of five from the IESC, accompanied by E&S specialists from the IFC, participated in the site visit meetings and inspections to assess CBG's HSE&S performance, including progress towards meeting the requirements of the Environmental and Social Action Plan (ESAP) (as amended in September 2021).

Throughout the site visit, the IESC team was granted full access to CBG documentation and received good cooperation from the CBG HSECQ Department and other CBG departments. Members of the IESC and Policy Lender teams split into sub-teams to focus on the team members' disciplines, namely: Health and Safety, Environment (excluding biodiversity), biodiversity, social (excluding resettlement) and resettlement. More specifically, the IESC held detailed discussions on the following topics:

- General:
  - Status of the Phase 1 Expansion and MUOA Projects;
  - HSECQ structure and resourcing;
  - Measures in place in response to protect the CBG workforce and communities from COVID-19;
  - Status of the Société de Minière de Boké (SMB) Rail construction (within CBG's South of Cogon concession);
  - Status of COBAD Road Operations (within CBG's South of Cogon concession); and
  - Current short-term mine plans and proposed CBG exploration activities within the South Cogon Concession Area and North Cogon Concession Area.
- HSE:
  - Status of HSE Management Systems;
  - H&S metrics and performance;
  - Audit and inspection programme;
  - Implementation of Management Plans, including those relating to: Air Quality, Noise and Vibration, Waste, Hazardous Materials, Dredging, Resource Use and Efficiency, Water Quality, Environmental Monitoring; and
  - Management of Change (MoC).
- Social:
  - Community Relations and Resettlement personnel resourcing and capacity development;
  - Performance of the IsoMetrix software platform for managing social and biodiversity risks;
  - Labour and working conditions;
  - Community health and safety (H&S), including communicable diseases, health infrastructure and rail-related H&S issues;
  - Blasting at the mine;
  - The scope and focus of stakeholder engagement; and
  - Community grievance/doléance<sup>2</sup> management.
- Resettlement:

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<sup>2</sup> *Doléances* are community requests for assistance (such as improving a road, building a clinic, or providing a new well for water).

## CBG BAUXITE MINE

- The implementation status of the Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP);
- The status of Livelihood Restoration Plans (LRPs);
- Cumulative impacts;
- Monitoring; and
- Resettlement implementation capacity.
- Biodiversity:
  - Resourcing levels;
  - Biodiversity inspections including land rehabilitation;
  - Biodiversity Action Plan (BAP);
  - Five-year Land Rehabilitation Plan;
  - Offsets (off-site); and
  - CBG supervision/monitoring of the SMB railway and the COBAD Road

The site visit itinerary is provided in Appendix 1.

This report focuses on the findings arising from the March 2022 site visit; however, it also refers to earlier reviews and reports, reflecting the ongoing nature of many ESAP deliverables and the IESC's continuing role in monitoring CBG's HSE&S performance.

## 2. SCOPE AND STRUCTURE OF THE REPORT

### 2.1 Scope

As a condition of the Common Terms Agreement (CTA), CBG is required to appoint an IESC to monitor (audit) and report on the implementation of the ESAP and compliance with the applicable IFC PSs and E&S commitments and, in doing so, present the E&S risks associated with the Expansion Project, the MUOA Project and CBG's wider operations. This report has been prepared for the attention of CBG and Lenders regarding the Phase 1 Expansion and MUOA Projects.

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

- A review of ESAP implementation;
- A review of certain HSECQ Management System documents, notably agreed management plans;
- A review of certain sections of CBG's 2022 AMR (draft version received during the writing of this report);
- Review of recent Borrower's E&S Compliance Certificates for Q4 2021;
- Interviews held with key HSECQ staff within CBG;
- Interviews with CBG's contractors;
- Interviews with other CBG departments; and
- Meetings with community members affected by the Phase 1 Expansion Project, MUOA Project and CBG's broader activities.

### 2.2 Project Standards

In accordance with the IESC's Terms of Reference (ToR), the Project was assessed against the following standards and guidelines:

- Applicable laws and regulations of Guinea;
- Specific commitments made by CBG and requirements specified in the ESAP;
- IFC Performance Standards on Environmental and Social Sustainability (2012), specifically:
  - Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
  - Performance Standard 2: Labour and Working Conditions;
  - Performance Standard 3: Resource Efficiency and Pollution Prevention;
  - Performance Standard 4: Community Health, Safety and Security;
  - Performance Standard 5: Land Acquisition and Involuntary Resettlement;
  - Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and
  - Performance Standard 8: Cultural Heritage; and
- WBG EHS Guidelines applicable to the Project.

IFC Performance Standard 7 on Indigenous Peoples was excluded from the scope of the monitoring on the basis that no Indigenous Peoples are affected by the Project.

### 2.3 Structure of the Report

Section 3 provides a very brief description of the Expansion Project status, the MUOA Project status and other CBG activities. Section 4 describes how different levels of significance are attributed to issues highlighted in the report. The report is then structured around the seven IFC Performance Standards applicable to the Project, as listed above, and supporting WBG EHS

Guidelines. The key findings identified during the March 2022 site visit and the IESC's recommendations to address them are summarised in 'significance tables' for each IFC Performance Standard at the end of each section.

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

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

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

### 3. PROJECT STATUS

This chapter provides a brief description of the Expansion Project status, the MUOA Project and other CBG activities ongoing at the time of the site visit in March 2022.

#### 3.1 Status of the Expansion Project

The IESC's preceding Monitoring Report (October 2021) reported that construction of the Expansion Project was largely complete and that most of the construction contractors associated with the Expansion Project had left the site. All construction works had been completed and commissioned, however modifications to the new Dryer 4, needed to increase its throughput capacity to a level closer to the design capacity of 1,400 tonnes per hour, were ongoing. The two key modifications required were:

- To increase the lifting capacity in the dryer (internal configuration of lifters); and
- To the motor torque by adjusting the electrical current on the Variable Frequency Drive (VFD).

As of March 2022, these works had been completed and performance testing is scheduled for August 2022<sup>3</sup>, following the onset of the rainy season.

#### 3.2 Status of MUOA Project

During the previous VSV (October 2021), the overall progress of the MUOA Project was reported at 60%. Progress in March 2022 was reported to be 64% complete (as of January 2022) with the same key tasks to be progressed, namely:

- Installation of permanent signalling (at 14.4% progress with a scheduled end date of February 2023);
- Construction of the locomotive maintenance workshop (with a scheduled end date September 2023); and
- Delivery of 7 SD40 locomotives, possibly in 2022, under the Phase 1 scope.

Other notable developments include:

- 4 railway footbridges in Kamsar are complete (under work package 1)
- 4 railway footbridges are 65% complete (under work package 2)
- 4 railway footbridges (2 at Kolaboui and 2 on the GAC spur) are 36% progressed.

The ongoing footbridge work is behind the original schedule (fencing and footbridges were originally scheduled for the end of December 2019 according to the Road and Rail Safety Management Plan). CBG is also negotiating the supply of Betafencing with suppliers with CBG already in a position to sign contracts for the installation of the fencing.

The latest available MUOA Project schedule is shown in Figure 3-1. Overall completion of the MUOA Project is scheduled for the end of 2023.

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<sup>3</sup> Performance testing, initially scheduled for September 2021, was postponed due to the military coup that occurred in Guinea, which prevented contractors from travelling to the country.

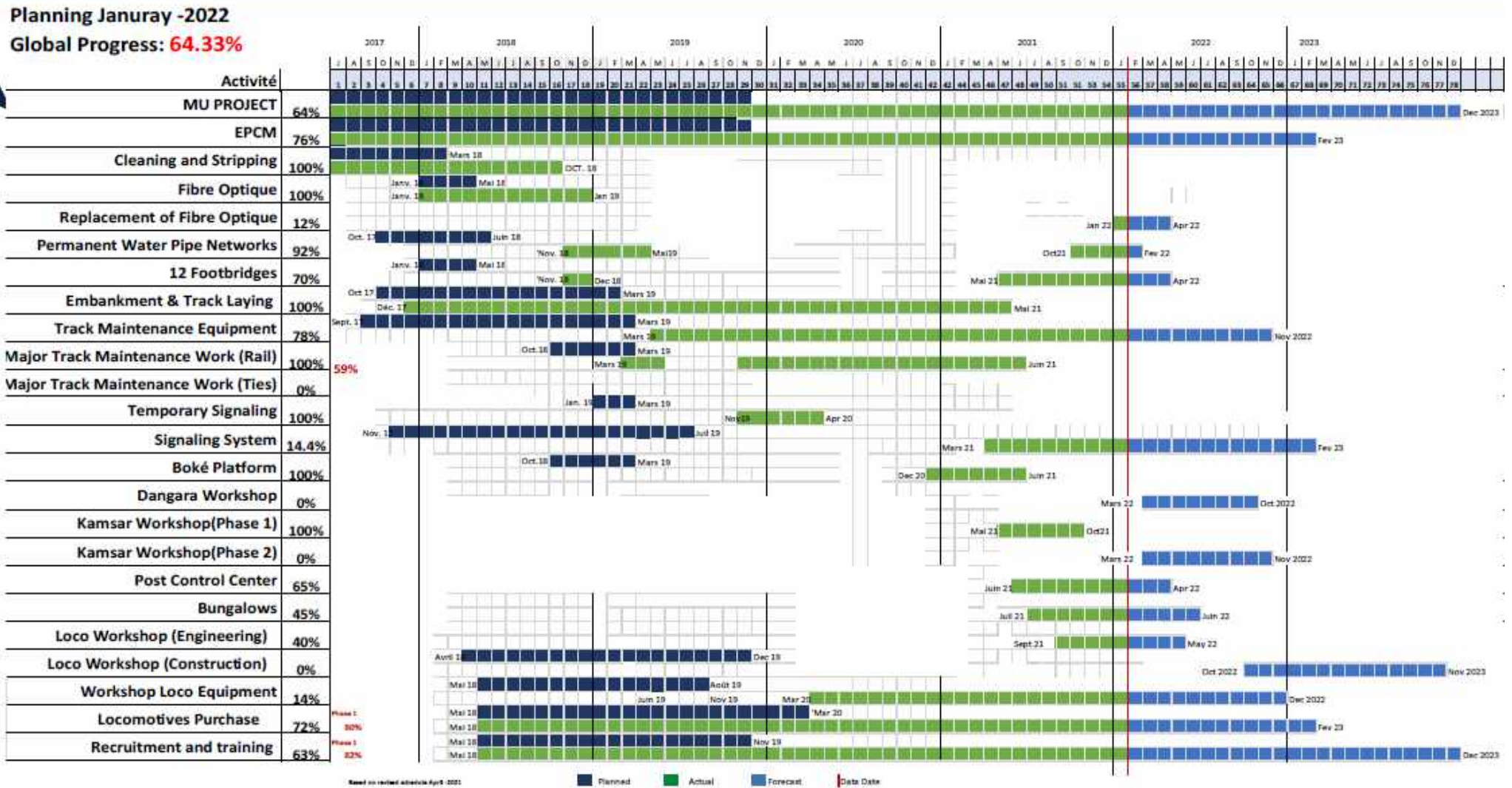
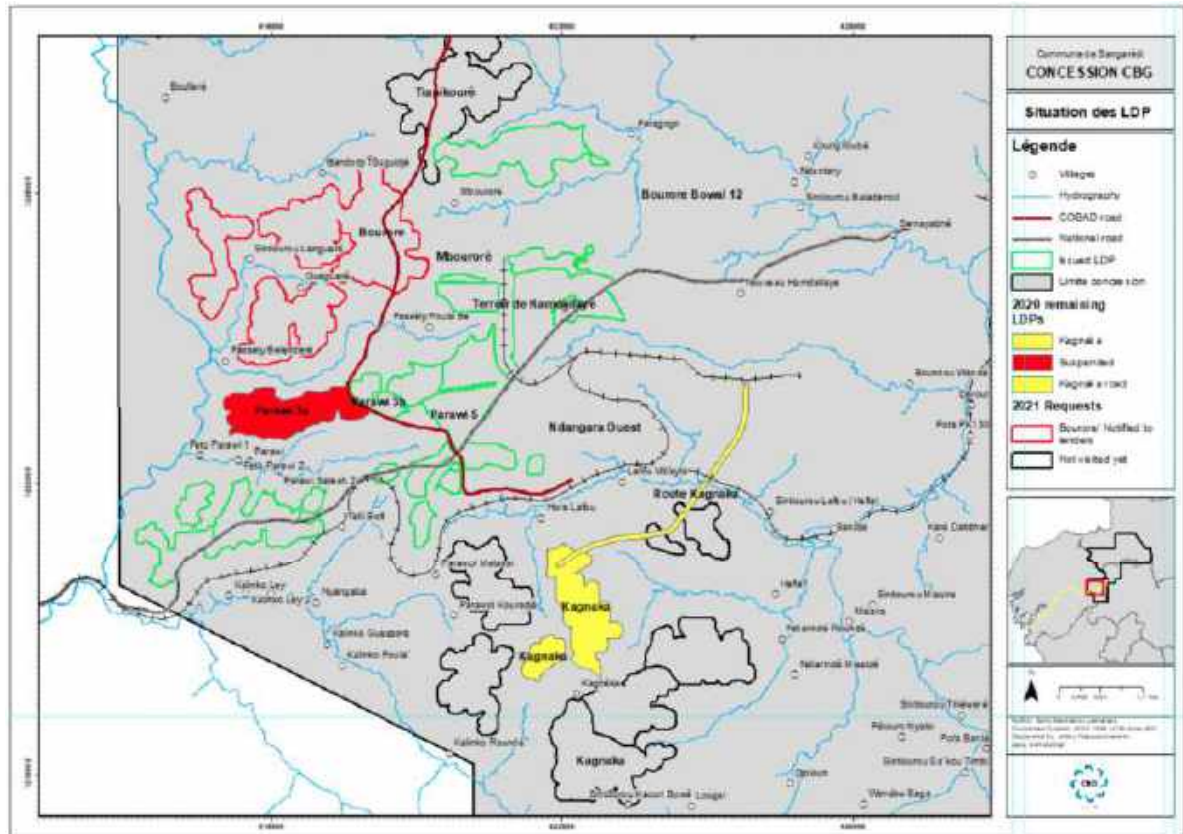


Figure 3-1: MUOA Project Progress and Revised Schedule, January 2022



**3.3 Status of South of Cogon activities**

During the site visit, CBG provided an update with regards to its six quarter (short-term) mine plan. The status for the Parawi 3b Plateau (indicated by red shading in Figure 3-2 below) is unchanged and the internal permitting process - the Land Disturbance Permitting (LDP) process - remains suspended because of the speculative construction of buildings and commencement of economic activities in the affected area. LDPs are completed for Ndangara and Koobi, Parawi 5 and Parawi 3a with others (for Kagneka Road, Kagneka Plateau and Mbouroere Plateau) LDP in



progress.

**Figure 3-2: South of Cogon Concession Area, Showing Location of Parawi 3a Plateau**

There is no South of Cogon exploration activity at the time of reporting.

**3.4 CBG activities in the North of Cogon Concession Area**

The IESC’s October 2021 Monitoring Report provided a status update for CBG’s plans to mine the NoCo Concession Area. In summary, the October 2021 Monitoring Report highlighted that further exploration work was on hold, pending application of the LDP process for exploration works.

During the March 2022 site visit, CBG informed the IESC that further non-intrusive scoping visits had taken place in February 2022 with AGEE (Agence Guinée des Évaluations Environnementales)<sup>4</sup> with favourable response from AGEE received. It is therefore CBG’s intention to proceed with the finalisation of an LDP, subject to necessary social and environmental studies. Access feasibility studies are currently underway and a full international Environmental and Social Impact Assessment (ESIA) will be developed following analysis of feasibility studies if a decision is taken to mine the NoCo Concession Area.

<sup>4</sup> Formerly the BGEE.

As reported previously, at this stage no decision has been taken to mine the NoCo Concession Area. The IESC understands the timeframes for any NoCo mining are long-term. In the short-term, the CBG HSECQ team will work with a dedicated NoCo Project Manager, who is currently assessing the feasibility of future NoCo mining.

## 4. SIGNIFICANCE ASSESSMENT

### 4.1 Review findings

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

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

### 4.2 Assessment of significance

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

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

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

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

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

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

Where time-critical recommendations are made, a timeframe linked to Construction/Operational phase milestones is indicated in the 'IESC Recommendations' column. Time-critical issues measures can lead to a higher classification of significance. Conversely, high significance issues can be given a lower classification if measures are in place/in progress to address a concern.

**Table 4-1: Example of the Summary Table Format**

ID	Aspect	Issue Description	Phase <sup>5</sup>	IESC Recommendations	Sign
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities. To date the Company has been unable to procure monitoring equipment – no monitoring has been undertaken.	Ops	<i>Company X shall Expedite procurement of monitoring equipment with the support of senior management.</i>	<b>Moderate</b>

<sup>5</sup> Phases can include construction; operations; decommissioning; or any combination of these phases.

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

### 5.1 HSECQ Resources

This section provides an update on HSECQ resources, including a discussion around senior HSECQ positions and the CR team. Additional commentary on resettlement-related resources is provided in Section 9.6.

#### 5.1.1 Senior HSECQ Positions

The IESC reported the status of HSECQ resourcing, including recent hires in line with the Time-bound Recruitment Plan, in its October 2021 Monitoring Report. The situation, as of March 2022, remains largely unchanged as summarised below.

- Key leadership positions for Community Relations, Biodiversity and Environmental Monitoring are filled;
- The Resettlement Manager's post remains vacant and is being fulfilled by the CR Manager with support from an experienced external resettlement specialist;
- The HSEC Director<sup>6</sup> role is being fulfilled by the Deputy HSECQ Director (the Acting HSECQ Director). The position of HSECQ Director should be filled with an experienced HSECQ professional with proven track record in improving HSECQ performance on other similar projects;
- A 6-month secondment of a HSE Integrated Management System (IMS) coordinator is ongoing; and
- There is ongoing support from a number of consultancies (as reported previously), including provision of an external resettlement specialist.

At the time of the March 2022 visit, the external resettlement specialist had been in place since December 2021 and was 3 months into a 6-month contract. The need for the recruitment of a permanent Resettlement Manager, anticipated by mid-2022, was highlighted in the previous IESC Monitoring Report and remains a priority action.

Although not a dedicated HSECQ resource, the IESC further notes the appointment of an Operations Director. The Operations Director was present throughout the March 2022 monitoring visit and engaged with the IESC and Lenders present during the visit. The IESC welcomes the level of engagement from the Operations Director and views the appointment as a significant development, particularly where environmental and social actions will require significant investment and/or Senior Management approval.

#### 5.1.2 Resettlement Team

Additional resources for the Resettlement Team include:

- Framework Contract – SAMEC: Resettlement Specialist. Regular support in activities related to land disturbance management (inventories, plot survey and socio-economic surveys as required). Contract is signed.
- Framework Contract – SIGMA: Resettlement Specialist. Implementation of a geo-referenced data management system for land disturbance and compensations, and delimitation of villages islands. Contract is signed.

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<sup>6</sup> HSECQ Director left his post in early 2021.

As noted in Section 5.1.1, the Resettlement Manager's post remains vacant and is currently being fulfilled by the CR Manager with external support. As of March 2022, the following additional resources are further required and are in the process of being identified:

- A resettlement specialist to provide support with the development of LRPs and conduct of corresponding socio-economic surveys.
- A resettlement specialist to provide support with the implementation of livelihood restoration activities.

In relation to the above, contracts with third parties to secure the services of such specialists are being explored.

### 5.1.3 CR Team

The CR Team remains effective under the leadership of the CR Manager, who has been in post since the first IESC monitoring site visit in November 2016. Following the departure of the Resettlement Manager in mid-October 2021, the CR Manager took over all responsibilities held by the Resettlement Manager, with support from an external resettlement specialist, since this time. As noted at the beginning of Section 5, additional observations regarding resettlement-related resources are provided in Section 9.6.

#### *Staff Resources*

In March 2022, the CR Team's consisted of 9 members of staff (the same number as was recorded at the time of the October 2021 VSV). Five team members are based in Kamsar (including the CR Manager, the CR Superintendent, a Community Development Coordinator and 2 CR Coordinators); four team members are based in Sangarédi (all of whom are CR Coordinators).

Since March 2021, the CR Team based in Sangarédi has continued to be supported, on a full-time basis, by a staff member from the Mining Department of CBG. This staff member is focused mostly on blasting-related community sensitisation and consultation, but also provides support for other CR Team activities. This staff member will become a formal member of the CR Team during Q2 2022. The official transfer should occur when the entire HSECQ organisation chart has been reviewed and approved. Upon completion of the internal transfer, CBG is recommended to revise the organigramme pertaining to the CR Team with details regarding the roles and responsibilities of the new team member accordingly.

CBG has provided the final version of the Time-bound Recruitment Plan 2021-2023 for the CR Team and Resettlement Team. The current version of this Plan includes the following actions and timings for CR personnel resourcing:

- Completion of internal transfer of the Mining Operations employee to the CR Team in Q2 2022 (previously anticipated in Q4 2021); and
- Recruitment of the following team members in Q3/Q4 2022 to 2023:
  - a Community Engagement Coordinator, to be based in Sangarédi, to provide a local managerial presence to ensure the maximum effectiveness of the existing Sangarédi-based CR personnel; and
  - a database specialist, to be based in Kamsar, to ensure that CBG's IsoMetrix database<sup>7</sup> is being used to its full potential, and to assist the Resettlement Team with the management of its own database.

Thus, by the end of 2023, the CR team's staff is planned to consist of 12 members in total, representing an increase of 3 on its current size.

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<sup>7</sup> IsoMetrix is the software platform for managing social and biodiversity data which was installed in early 2021.

CBG's IsoMetrix database is experiencing performance issues which, as of March 2022, are yet to be resolved. Given that it was installed in early 2021, the database has thus not been used to its full potential for over 1 year. The database is expected to be fully operational by Q3 2022, representing a delay of approximately 6 months compared to the findings of the previous VSV in October 2021. To assist with the resolution of performance issues related to the IsoMetrix database and ensure that this action is completed by Q3 2022, it is expected that CBG will expedite the appointment of the database specialist.

Since approximately July 2021, the CR Team has benefitted from consultancy support provided by ACORN International under the terms of a 1-year renewable contract. To date, 2 consultants from ACORN International are assisting the CR Team. One consultant was based in Kamsar until the end of January 2022 and is now rotating; the other consultant was also based in Kamsar, until August 2021, but now provides support from their office base. Both consultants are part-time in terms of the level of support provided. The scope of their support to the CR Team includes:

- Monitoring of E&S Management Plans;
- Update of ESAP deliverables; and
- Supporting with requests generated by the Compliance Advisor Ombudsman (CAO) mediation process support.

They report to the Acting HSECQ Director for all of their activities, except for in the case of support related to the CAO mediation process, where reporting is to the CR Manager. The contract with ACORN International has been extended until December 2022, with the same scope of work, as recommended by IESC.

In 2021, the CR Team devoted a considerable portion of its stakeholder engagement efforts to resettlement issues (e.g. the Hamdallaye/Fassaly Foutabhé RAP and the Thiapikouré LRP), and to the MUOA Project (specifically community/local authority engagement meetings related to the installation of rail crossings under the MUOA Transitional Measures Plan). A total of 26 community awareness sessions were carried out on railroad safety covering:

- 6 schools (in Kamsar);
- 40 villages (in Kamsar, Kolaboui, UC Boké, Tanènè and Sangarèdi);
- 2 bus stations (Kamsar and Kolaboui Transporters Unions);
- 3 marketplaces (in Kamsar and Kolaboui);
- 7 mosques (in Kamsar, Kolaboui, UC Boké and Tanènè);
- 1 group of cattle breeders along the railroad track (in Kamsar);
- 16 community information and consultation meetings were held with the communities of Kamsar, Kolaboui, Tanènè and Boké as part of the start of the footbridges work; and
- 2 awareness-raising meetings of students of Kassongony primary and secondary schools of the safe use of bridges.

Currently, and likely to continue in the forthcoming months, the CAO process requires periodic, high-intensity support to be provided on the part of the CR Manager and CR Superintendent. In the event of a 'Go' decision for the re-start of North of Cogon exploration, further strain will be placed on the CR Team.

Overall, there is considerable uncertainty as to the extent that overall CR Team workloads will increase during 2022. CBG should monitor the future demands placed on the CR Team as its plans materialise and are confirmed and ensure that adequate resourcing is in place, based in the most appropriate locations, to deal with fluctuating demands.

Furthermore, most of the engagement activities (and thus grievances, see Section 5.2 below) are taking place in Sangarèdi. The distribution of members of the CR Team between Sangarèdi and Kamsar does not correspond with the distribution of actual workload. Engagement activities in Sangarèdi currently require additional resources due to volume of activities being undertaken. Therefore, CBG should consider revisiting the current distribution of members of the CR Team between Kamsar and Sangarèdi. Some of the senior positions, which are currently based in Kamsar, should be based in Sangarèdi, along with the incoming recruitment of additional resources.

### *Equipment Resourcing and Training*

#### Equipment

CBG selected the software platform IsoMetrix for social, resettlement and biodiversity data management. The software was installed on 29 January 2021 and training to the CR Team was delivered, alongside a member of the resettlement team. Installation was planned in 2 phases, the first phase of which is now complete. Phase 2 (including the development of the 'dashboard) was launched but, as of March 2022, is on hold due to the problems with the overall performance of the IsoMetrix database (as mentioned above).

The IESC reported that CR Team members using IsoMetrix still experienced delays in certain IsoMetrix functions, particularly in terms of uploading and downloading files. Issues already identified during the VSV October 2021 have not been fully overcome as of March 2022, though CBG has decided to install a separate dedicated server located in Kamsar, Guinea. Achieving an acceptable level of performance will be thus delayed to Q2 2022 (depending on the installation of the server in Guinea).

Currently, the slowness of IsoMetrix is discouraging its users and, functionally, it is not considered fit-for-purpose. The next steps are, as follows:

- Relaunch of Phase 2 in Q2 2022;
- Installation of a dedicated server in Kamsar (this has been approved by CBG and the cost is included in a 2022) in Q1 2022. The action plan for the Server Acquisition and status of each action, as of March 2022, are outlined below:
  - Consult Supplier for Server Purchase – ongoing;
  - Server Purchase and Provisioning – not started (expected to be completed by 18th March 2022);
  - Operating System Installation – not started (expected to be completed by 22nd March 2022);
  - Database Migration to Server (by IsoMetrix) – not started (expected to be completed by 30th March 2022); and
  - System Performance Test – not started (expected to be completed by 6th April 2022).

IsoMetrix will support CBG to import social data into the IsoMetrix database as the task is now too big for CBG to manage by itself. Also, the IsoMetrix modules will be re-designed (as necessary) to be aligned with CBG templates (e.g. forms) used by the CR and Resettlement teams. New modules may also need to be created.

Version 2 of the Capacity Development and Resource Acquisition Plan (last revised April 2022) sets out the digital equipment (including software and hardware) to be acquired to enable better data collection in the field and, subsequently, office-based data analysis and presentation (especially GIS/mapping) with dates by which acquisition will be completed.

#### Training

At the time of the March 2022 site visit, only 3 of the 7 scheduled 2021 training events were completed, namely:

- Integrated Data Management System (delivered by IsoMetrix) – occurred in Q1 (January) 2021;
- Stakeholder Analysis and Engagement – occurred online in Q2 (June) 2021 – one person from CFB attended along with CR Team members.
- Social Management for Participative and Sustainable Development in Mining Regions (Centre of Social Excellence, CSE) – occurred in Q4 (December) 2021 – one member of the CR Team attended. Training to the remainder of the CR Team is pending.

The other four trainings have been postponed until later in 2022, including the IFC Advisory training event on the 'Management of Grievance Mechanisms'. This training will be open to the broader CBG group; that is, it will not only be limited to the CR and Resettlement teams.

A new training topic/event has been added to the schedule and completed – 'Promoting the Social Acceptability of a Project' – an online course delivered over five weeks and provided by the University of Sherbrooke (Canada) in September to October 2021. A total of 2 members of the CR Team and 1 member of the Resettlement Team attended the training. Internal training to their CBG colleagues, based on the content of the training provided by the University of Sherbrooke (Canada), is scheduled to be undertaken on 11th March 2022.

As indicated in the previous October 2021 VSV, it is unfortunate that several training events have been delayed, potentially for more than one year. Nevertheless, as per IESCs previous recommendation, the CR Team has taken into account the following actions to be adopted to improve training outcomes, whilst minimising disruption to workloads:

- Planning and organising staff time so that there is minimum disruption to workloads while fulfilling training commitments. Possible options include careful selection of personnel to attend specific training events, scheduling events so that one event immediately follows another ('back-to-back' sequencing) and providing incentives for some training to be undertaken outside of standard working hours. It has since been reported to the IESC that 2 interim positions have been approved to back-up absent members of the CR Team where they are undertaking training abroad, as well as to provide maternity leave cover in Sangarèdi. CBG has been recommended to update the CR Team organigramme to reflect the above arrangements accordingly.
- Applying the 'train the trainer' model where only one or two staff members attend a training event and then subsequently train their colleagues on the key principles and/or practices in shorter subsequent internal training events.
- In the context of future training needs for the period 2023 – 2024, selecting fewer key training topics/events (perhaps a maximum of 10).

The results of applying these recommendations should not only assist CR and Resettlement Team members to better manage their workload/training balance; it should also free up some time for CR and Resettlement Team staff to add value to their training experience, including knowledge gained, by training colleagues from other departments on certain key topics such as managing grievances. Following the previous IESC October 2021 VSV recommendations, as part of CBG's efforts to bring current operations up to a level consistent with the intent of the IFC Performance Standards (an ESAP requirement), there is a need for other departments (such as Human Resources, Procurement and Legal, and Mining) to be aware of their role in these efforts. One way of achieving this objective is for a programme of periodic, internally-led training or awareness-raising events to be organised and delivered. To maximise the potential benefits from this programme, the IESC suggests that the HSECQ Director (supported by the CR Manager)



consider convening a meeting with the directors of key departments to discuss a practical approach to implementing this programme and providing support.

## 5.2 Stakeholder engagement

### 5.2.1 Updated Stakeholder Engagement Plan & Grievance Management Mechanism

In the summer of 2021, CBG appointed a consultancy (NTRospective) to prepare the Stakeholder Engagement Plan (SEP) for the period 2022-2025. The preparation of the draft 2022-2025 SEP is now complete. It constitutes a comprehensive revision of the SEP and Grievance Management Mechanism (GMM) that was first issued in 2016 and seeks to respond to a number of requests made by the IESC during the October 2021 VSV (such requests are stated in the October 2021 Monitoring Report and are thus not repeated here). At the time of the March 2022 site visit, the first draft of the 2022-2025 SEP had been reviewed by the IESC and Policy Lenders and the document is currently being finalised in line with the feedback received.

Given that the first draft of the 2022-2025 SEP is being currently updated, it is not considered ready for disclosure and therefore has not been uploaded to CBG's website. Once finalised, the 2022-2025 SEP will be uploaded onto CBG's website, replacing the 2019-2021 SEP which is currently publicly available. The finalisation of the 2022-2025 SEP is, nevertheless, a major task and it is therefore assumed by the IESC that it will not be ready for disclosure until Q2 2022.

During the October 2021 VSV, further requests were made by the IESC in relation to the GMM, including (but not limited to) a request for a stand-alone GMM be established (separate from the SEP). The GMM has been updated in response to these requests and reviewed by the IESC. Similar to the 2022-2025 SEP, the GMM is yet to be finalised.

Once the 2022-2025 SEP and GMM are finalised, intensive training, focusing on the roll-out of the 2022-2025 SEP and the updated GMM, should be implemented for all community-facing staff (including external consultants). This training should include the planned training on 'Management of Grievance Mechanism' to be provided by the IFC Advisory, which is expected to occur in 2022<sup>8</sup>.

### 5.2.2 Implementation of the stakeholder actions for the year 2021 as presented in the 'Action Plan for Stakeholder Engagement 2019-2021'

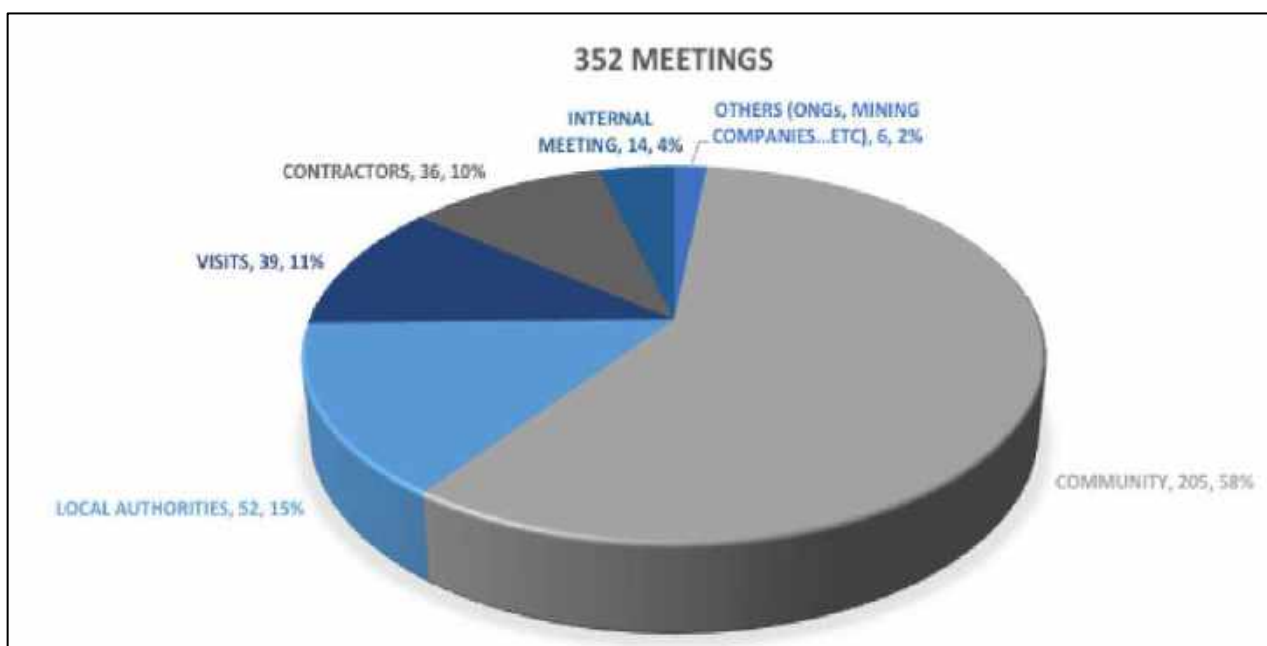
A total of 45 actions were planned in the 'Action Plan for Stakeholder Engagement 2019-2021'; 29 of which are either continuous or ongoing (compared to 25 in October 2021). Of the 26 remaining actions, 13 are completed and 3 are not yet started and will be delayed (compared to 7 in October). The following 3 remaining actions depend on other CBG activities or review by the IESC and Policy Lenders:

- Information and awareness raising on the re-start of prospective activities and other subjects (Wéladembé, Koulasonrè, Tioucoré, Kolandyi, Lingourou Pely, Kadiorè, Boniwel, Barkèrè), which will be carried out as part of the delivery of the LDP process for NoCo exploration.
- Community and local authority training on the Community Development Plan (CDP), which is pending the Policy Lenders'/IESC's review. *Post visit note: comments since provided.*
- Production of GMM materials, which an external consultant – INSUCO – will produce when Compensation and Resettlement Policy Framework (CRPF) is validated.

<sup>8</sup> As stated in Section 5.1.3, the date of this training is yet to be determined

### 5.2.3 Scope and focus of stakeholder engagement

In 2021, there were 352 stakeholder meetings (205 of which were with the affected communities), compared to 230 meetings in total in 2020. Figure 5-1 provides a breakdown of the number of meetings per stakeholder category and the same data expressed as percentages.



**Figure 5-1: 2021 – Numbers and Percentages of Meetings, Disaggregated by Stakeholder Category**

In 2021, community-focused meetings occurred in 121 villages (2020 equivalent figures are provided in parentheses), as follows:

- Mine – 55 (51) villages;
- Railway – 56 (34) villages; and
- Port 9 (13) villages.

The only noticeable change is the increase in the number of villages located in the vicinity of the railway, reflecting the meetings concerned with all aspects of railway health and safety, especially the provision of new footbridges and the improvements made to existing at-grade crossings, such as level crossings.

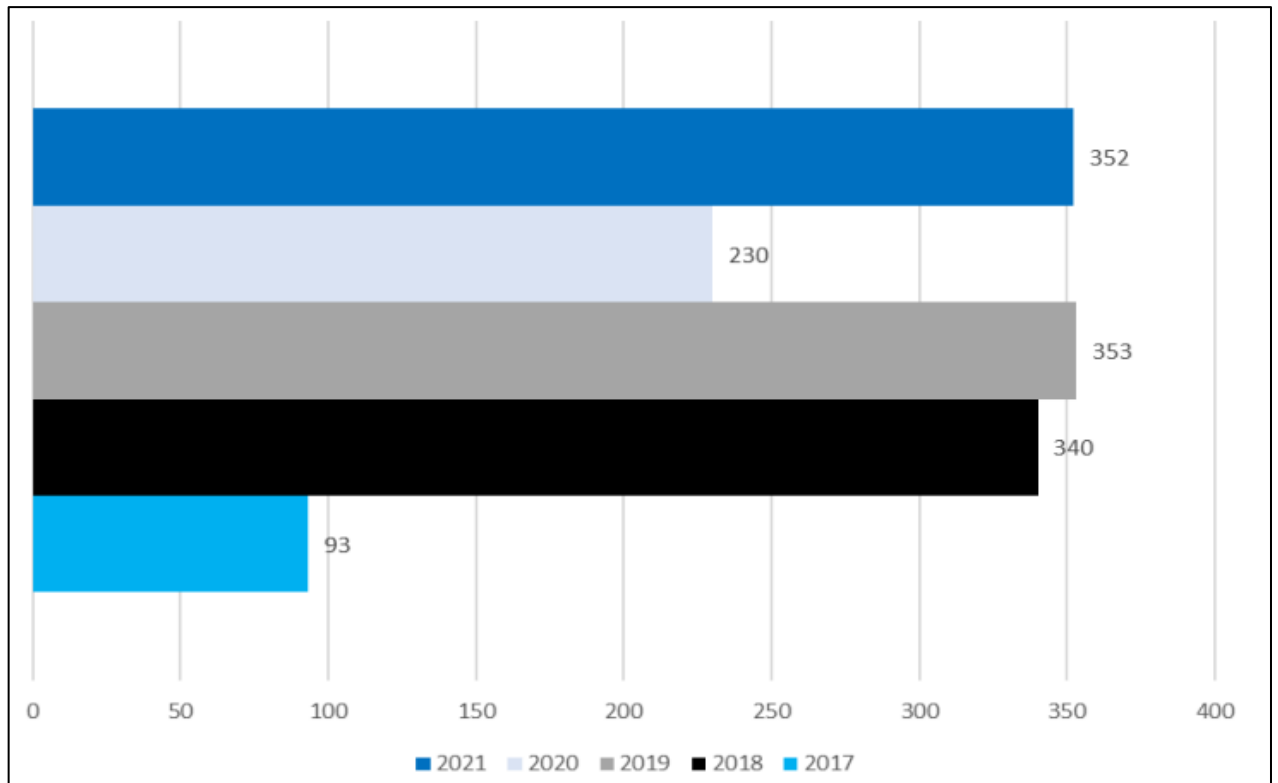
Figure 5-2 compares an analysis of all stakeholder engagement meetings by zone over the period 2019 to 2021. It is necessary to be careful in drawing conclusions as the 'context' for stakeholder engagement during each of these three years differs. Nevertheless, the data do indicate some differences in the focus of stakeholder engagement over the three-year period:

- The number of meetings occurring in the mine area has increased noticeably year-on-year (72% in 2021 to date compared to 47% in 2019). Most of the community consultations covered the mining operation activities, the RAP of Hamdallaye and Fassaly Fouthabhé and the LRP of Thiapikouré and Kankalaré and the blasting protocol. Awareness-raising meetings as part of water and electricity-alert management also took place.
- The decline in the number of meetings in the port area is continuing, though there was only a 3% reduction between 2020 and 2021 compared to a 15% decline between 2019 and 2020. The engagement activities consisted mainly of identification, contact and awareness-raising meetings with island communities, including with traditional fishermen. Several meetings also took place with respect to the management of the electricity crisis in Kamsar.

- The proportion of meetings related to the railway (including MUOA-specific consultations) was almost identical for 2019 and 2020, though there has been a decline of 8% between 2020 and 2021. Due to increasing railroad traffic, most of the community consultations focused on raising awareness on railroad safety among residents.

It is noteworthy that the number of meetings occurring in the mine area has increased from 47 to 72 % of the total over the period 2019 to 2021. This increase is likely due to an increase in the size of the area to be mined and the resulting number of resettlement-related plans being prepared.

CBG has assessed the trend in stakeholder engagement meetings since 2017. As per the available data, the number of meetings in 2021 has reached the previous level in 2019 (2020 being clearly affected by the outbreak of the COVID-19 pandemic).



**Figure 5-2: Trend in Meetings Since 2017**

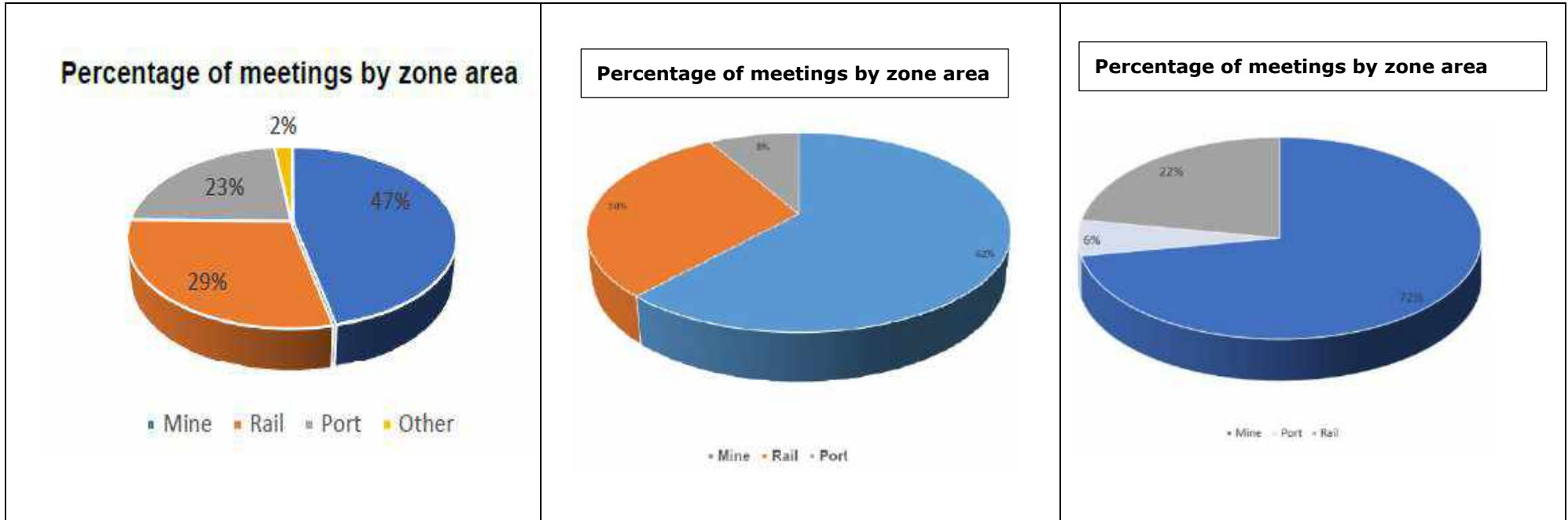


Figure 5-3: Percentage of Stakeholder Meetings (%) by Zone Area in 2019 (Left), 2020 (Centre) and 2021 (Right)<sup>9</sup>

<sup>9</sup> The 'other' category refers to internal stakeholders and, as it is such a small % it can be discounted for the purposes of the analysis, based upon these data, presented in the accompanying text.

#### 5.2.4 Female Participation in Stakeholder Engagement Meetings

In 2021, CBG reports the following women’s participation rate in meetings:

- mine (23%<sup>10</sup>);
- port (30%); and
- railway (42%).

Notably, the proportion of females attending meetings in communities affected by the mine in 2021 has decreased by from 32% to 23% since 2020.

In 2021, there was an increase in women’s focus groups in all 3 areas of operation:

- Port: increase in female participation, notably due to meetings organised in the island communities off Kamsar (focus groups on the islands of Taidy, Diapiré 1, Diapiré 2).
- Mine: the rate of female participation remains low, though this change may not be representative of 2021 as a whole as the main agricultural season is from May to October and, during this period, many women are working outside of the core village areas. Focus groups were organised in Loppé, Madina, Madina dian, Dantari and so forth. Contrary to what was expected following the previous October 2021 VSV, meetings in Q4 2021 did not attract more females and thus actions to remedy the reduction in levels of female participation in meetings, observed to date in 2022, are required.
- Railroad: rates of female participation are relatively high as compared to 2020. Awareness-raising activities held in the context of railroad safety in schools and marketplaces reach many women (including the marketplace of Sahara, focus groups in Yenyébouré, Madina Kébéya and so forth).

It is too early to elucidate whether the new actions to increase women’s participation are having an effect. The next IESC site visit should provide a better insight into the progress of the results of the efforts to increase women’s participation, as per the IESC’s recommendations and in the context of the 2022-2025 SEP.

#### 5.2.5 SEP Implementation 2022

The IESC has been advised that a monthly follow-up, by a dedicated person, on the implementation of the Action Plan for the SEP is being undertaken. In addition, a quarterly follow-up will be carried out at the General Management level as part of the various action plans for compliance with the IFC Performance Standards (ESAP #1, Roadmap).

The CR Team has identified the following main aspects to be considered in the first community consultation framework, as part of 2022 community engagement activities, for Kamsar:

- Women and young people have requested the inclusion of young people to be employed on the installation of the betafence and employability in general.
- Overall community concerns about water, sanitation and electricity, as well as rail and road safety. It is understood that local authorities will lead the disconnection of illegal consumers of water and electricity (an area of major concern for communities).
- Civil society organisations (CSOs), including non-governmental organisations (NGOs), have requested CBG’s support with respect to the fight against the gender-based violence and the application of the local content policy by CBG.
- Local authorities have expressed their wish to relaunch the program to fight against malaria, in particular, indoors.

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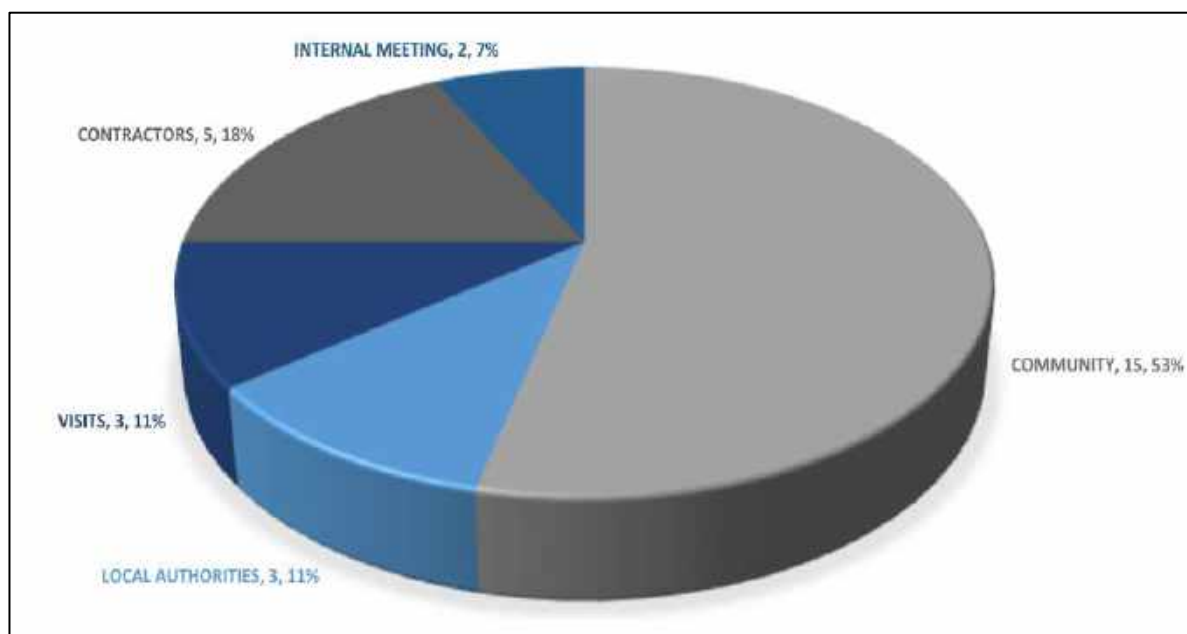
<sup>10</sup> Compared to 21% in Q1 2021.

Note that the Kamsar sub-prefectural youth delegate has expressed the commitment to maintain peace and social tranquillity in Kamsar (linked notably to high expectations in terms of employment amongst youths).

In addition to the risks associated with CBG activities and the GMM, for Q1 2022 the implementation of the SEP will focus on the following:

- Railway: community railroad safety;
- Port: community marine safety; and
- Mine: quarterly feedback on monitoring results, alongside blasting.

Most of the stakeholder engagement activities undertaken thus far in 2022, as of 15 February 2022, have targeted the affected communities (see Figure 5-4). A total of 30 meetings have taken place so far, 80% of which concerned operations, 10% of which concerned resettlement and 10% of which concerned the MUOA Project. Meetings took place in 17 villages (9 villages concerned by the mine and 8 villages concerned by the railroad).



**Figure 5-4: Numbers and Percentage of Meetings, Disaggregated by Stakeholder Category (01 January to 15 February 2022)**

## 5.2.6 Grievances Management

### 5.2.6.1 New Classification of Grievances

Until 2021, there was no separate grievance mechanism related to resettlement activities; any grievance arising from resettlement work was recorded in the GMM. The IESC alerted CBG during the October 2021 VSV that the annual number of grievances received over the past three years did not reflect the 'on the ground' reality, particularly considering grievance management by other mining companies in Guinea or in similar West African contexts (with the numbers of grievances being received by CBG per year being comparatively low).

The overall finding, based upon the analysis of all grievances over the past five years, was that the current grievance mechanism is not functioning effectively. The potential reasons behind this were discussed during the October 2021 VSV and a review and revision of the GMM was recommended by IESC (see Section 5.2.1 for further details).

As part of the revision of the GMM, a new classification of grievances has been adopted, divided in the following 4 categories and sub-categories:

- Resettlement and Land Occupation:
  - Infrastructure;
  - Compensation;
  - LRP; and
  - Survey/Inventory/Eligibility.
- Environment:
  - Water Spills/Pollution;
  - Air Quality/Dust; and
  - Noise/Vibration.
- Security:
  - Blasting/Cracks;
  - Road Safety;
  - Railway Safety; and
  - Marine Safety.
- Socio-economic (excluding resettlement):
  - Water;
  - Electricity;
  - Employment; and
  - Basic social infrastructure.

#### 5.2.6.2 Grievances Status – 2021

##### *Grievances Registered by Area and Type of Activity from January to December 2021*

- 89% of the grievances came from mining activities (50);
- 7% of the grievances came from the rail activities (3); and
- 4% of the grievances came from the port activities (2).

This trend is in line with the concentration of CBG's operations in the mining area. This also further validates the IESC's recommendation with regards to redistributing the available resources of the CR Team. Essentially, this entails targeting the efforts of the CR Team in the Sangarèdi area, including relocating some of the current staff from Kamar where engagement activities (and grievances) are limited by comparison.

##### *Grievances registered by category from January to December 2021*

- 72% of the grievances were economic related (40), the vast majority concerning allocation/compensation matters. A high number of complaints were registered due to exceeding the stripping limits in communities' lands.
- 20% of the grievances were safety related (11), more than half covering blasting-related grievances. There has also been an increase in the number of complaints regarding house cracks.
- 8% of the grievances were environmental-related (4), most of them regarding water spills and pollution.

It is important to note that the figures above reflect the previous classification of grievances (i.e. until 2021). Among the economic grievances (72% of the total), 95% were complaints regarding compensation and allocations.

*Open Grievances from 2021*

Out of the 55 grievances registered as of December 2021, 30 are now closed (as per February 2022) and 25 are still open.

Out of those 25 open grievances, there are:

- 18 non-resettlement-related grievances;
- 5 resettlement-related grievances; and
- 2 legacy grievances.

In previous IESC Monitoring Reports, the IESC noted that some grievances take more than six months to be closed. It is recognised that CBG has put considerable effort into fast-tracking the resolution and closing of grievances.

*Open Non-Resettlement-Related Grievances*

Most of the grievances are related to damages to crops/plantations, exceeding the stripping in communities' lands and house cracking. The protocol (including evaluation of impacts and elaboration of a compensation file) is in progress in most cases. There are some further grievances regarding water spills and pollution.

*Open Resettlement Related Grievances*

12 grievances were received in 2021, out of which 7 have been closed. It is noted that, following recommendations made during the October 2021 VSV, compensation-related grievances, which were previously categorised as 'Economic', have been assigned to the 'Resettlement and Land Occupation' category in 2022.

The remaining 5 resettlement grievances from 2021 that need to be closed are outlined below:

- Grievance of a person from Samayabhè contesting the compensation amount for the destroyed crops on the Thiapikouré Plateau following and over-run. A site visit, consultation with the town hall and feedback meeting with the complainant have taken place. Local authorities proposed to set up a joint team composed of CBG, local authority representatives and the complainant to take over the inventories to proceed with payment. This option has been refused by the complainant. CBG's CR Team should send a letter of response to the complainant and disclaim CBG's responsibility for the slow process.
- Complaints from Hamdallaye women regarding market gardening due to the low and poor quality of crops and the failure of the gardening campaign. Follow up meetings, site visits and advocacy meetings have taken place with the resettlement, Centre d'Etude et de Coopération Internationale (CECI) and Economic Interest Group (GIE) teams. Actions taken to date include the recruitment of a technician by CECI, informing complainants on the finalisation of market gardening activities, the definition of the type of assistance to be provided to the GIE and providing feedback to the GIE (see also Section 9.1.1.1 on livelihood restoration measures).
- A complaint from the community of Fassaly Foutabhé regarding the management of Income Generating Activities Programme (PRAMS) resources. A total of 2 meetings have been held at Sangarèdi Town Hall between the community, the authorities, CECI and CBG. CECI is developing an action plan to implement the recommendations of the meeting.
- A Samayabhè resident has complained about the exclusion of his land during asset inventory work. A site visit to evaluate the potential impacts, the elaboration of a compensation file and a feedback meeting with the complainant have already taken place. The validation of the resolution to be implemented is ongoing.



- 19 people from Hamdallaye have complained about the 56-hectare (Ha) land restoration programme (ESAP Item 26). Some corrective measures are in progress, such as removing iron bars and large blocks, softening slopes and applying black soil where needed.

#### *Open Legacy Grievances*

There are 2 grievances logged in 2020 that are still open. Below they are listed in date order, with the oldest being presented first, accompanied by a status report (as provided by CBG during the March 2022 site visit):

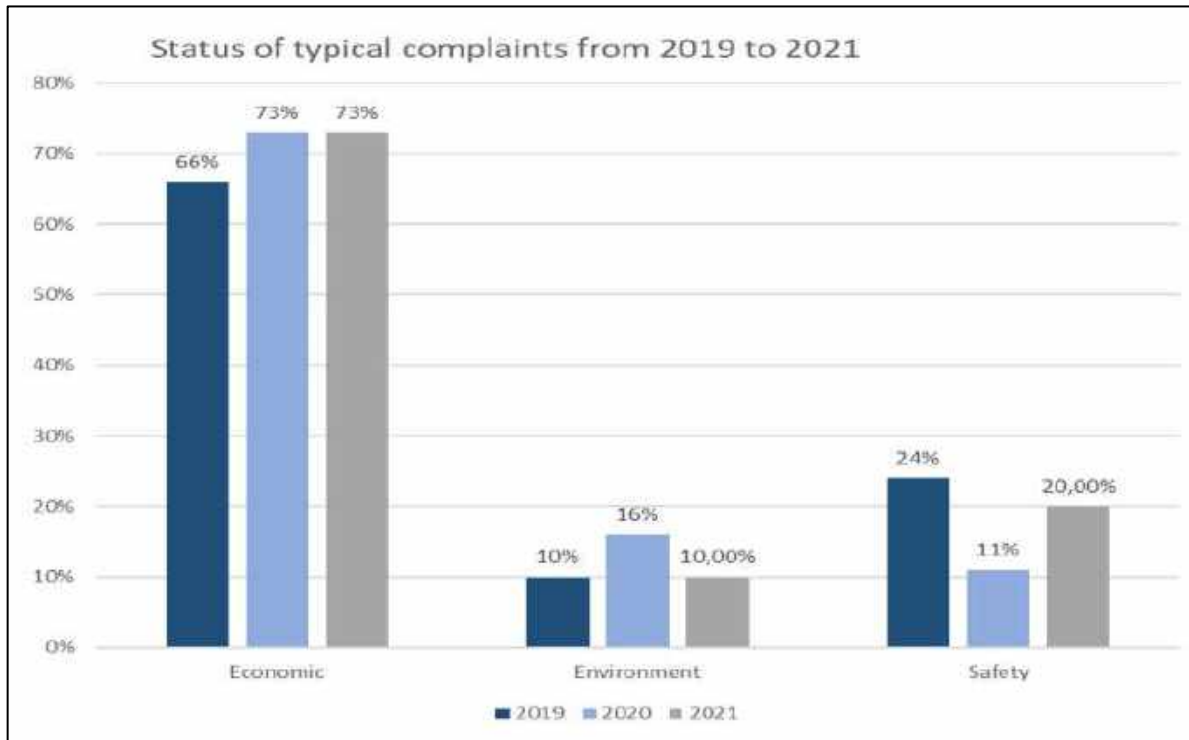
- A complaint dated 18 March 2020 was raised by the community of Fassaly Foutabhé related to the dust generated from activities relating to the Parawi storage area and arising from the COBAD mining road, which settles on their village. Mitigation measures have been put into effect but, despite these measures, the community does not wish to close the complaint.
- A complaint from Hamdallaye herders (logged on 15 May 2020) that CBG did not take their concerns regarding loss of pasture into account in the RAP preparation process. A study was conducted by the technical services of the Sub-Prefecture, in which various proposals to resolve the grievance were presented, along with their costs. A Memorandum was written and sent to CBG for validation. After validation, the recruitment of a service provider for implementing the agreed measures is in progress.

The following two grievances, open during the October 2021 VSV, have been closed:

- The community of Madina Kabenya raised a grievance (on 4 March 2020) concerning the destruction of their plantations due to an alleged fire which resulted from MUOA works on the railway. The community has engaged an advocate (lawyer) to act on its behalf. The community informed CBG, verbally, that it does not wish to engage with CBG directly. CBG is thus liaising with the advocate.
- A Kamsar resident raised a grievance (logged on 1 June 2020) regarding the infiltration of run-off water into his fields: The contract for carrying out the remedial work is signed. The finalisation of the compensation process is in progress.

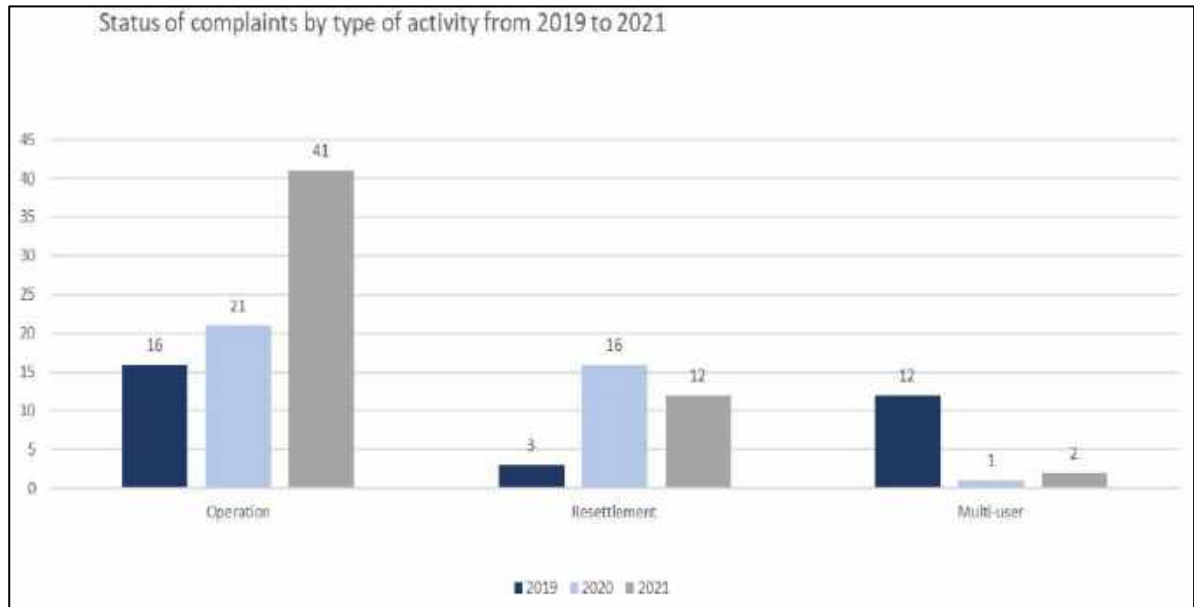
As already pointed out during the October 2021 VSV, it may be too soon to see a noticeable and sustained reduction in the amount of time taken to close grievances. Nevertheless, the data presented in this report provide a starting point for tracking grievance closure times over the next few years. This should also be improved through the implementation of the updated and improved GMM.

5.2.7 Grievances Trend 2019 – 2021



**Figure 5-5: Trend in Grievances by Category (2019 to 2021)**

The proportion of grievances received since 2019 has remained stable. Safety complaints have, however, increased in 2021, mainly as a result of complaints relating to blasting activities and cracks in houses.



**Figure 5-6: Trend in Grievances by Activity (2019 to 2021)**

In terms of the source of the grievances, the increase of grievances linked to mining operations are related to complaints regarding the destruction of vegetation following the stripping of land beyond the areas to be mined. However, the number of complaints concerning pollution (air and water) have decreased. CBG has highlighted that this trend can be attributed to the implementation of strategies to retain rainwater in the mining voids of exploited or rehabilitated

plateaus, the construction (along the mining roads) of retention basins (allowing suspended sediments to settle prior to discharge to surrounding areas) and watering of the mining roads to reduce dust levels. The number of complaints relating to the multi-user project have also decreased due to the decreased intensity of construction activities on the railway.

#### 5.2.8 Grievance Status - 2022

As of February 3<sup>rd</sup>, 2022, 20 community grievances have been registered, which can be classified as follows:

- 16 resettlement-/land occupancy-related grievances. Out of these 16 grievances, almost half of them come from the PRAMS/LRP implementation though there are others regarding compensation and infrastructure;
- 2 environment-related grievances; and
- 2 safety-related grievances (these are already closed).

The above data confirm that most of the grievances are resettlement-/land occupancy-related, thus highlighting the need for the CR Team and Resettlement Team to focus their engagement activities on land and resettlement related issues in 2022, as well as a reinforcement of the available resources in Sangarèdi.

#### 5.2.9 Community Requests for Assistance (*Doléances*) (2021)

43 requests for community assistance were received in 2021 (compared to 25 received in 2020 and 25 in 2019), mostly from the mine area (28), followed by the port (11), the railway (2) and out of CBG's concession area (2). As mentioned in the October 2021 Monitoring Report, the significant reduction in the number of rail area requests (down from 11 in 2019) may be due to the reduction in 'on the ground' MUOA-related activities.

The following data provides insight into the reasons behind requests for assistance in 2021:

- 39% were related to financial and material support;
- 9% were related to the provision of basic social infrastructure (such as boreholes, schools, and health centres) (compared to 41% in 2020);
- 23% were related to opening and/or rehabilitating community roads (compared to 27% in 2020);
- 16% were related to services (compared to 14% in 2020); and
- 13% were related to other reasons.

The main reasons behind the community requests received in 2021 remain consistent when comparing them against those received in 2020 except for the provision of basic social infrastructure, most likely due to the construction of boreholes in the previous year. The change in trend towards the increase in requests for financial and material support might require a deeper analysis throughout 2022 to understand the rationale behind it (unless it is a question of classification). Similar data will be collected in forthcoming site visits to ascertain if there is any trend starting.

Out of the 43 requests, 19 are now closed and 24 are being processed.

#### 5.2.10 Community Requests for Assistance (*Doléances*) (2022)

As of 28<sup>th</sup> February 2022, 8 requests for community assistance have been received by CBG (6 from the mine area, 1 from the port and 1 from the rail) as follows:

- 13% of the requests are related to financial and material support;

- 50% of the requests are related to basic social infrastructure (fencing and mosques);
- 12% of the requests are related to services; and
- 25% of the requests are related to others (e.g. redirecting part of the PRAMS fund for youth training).

### 5.3 Management Systems

The IESC has previously confirmed that the following International Organisation for Standardisation (ISO) certificates listed below remain valid until Q1 2023:

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

The IESC has also been informed that CBG is planning to become a certified member of the Aluminium Stewardship Initiative (ASI) in 2023.

### 5.4 Integrated Management System - Road Map

The IESC has previously reported on CBG's progress towards meeting ESAP Item 1, which requires CBG to *align HSEC MS for existing operations with HSEC MS for the Expansion Project and bring current operations up to a level consistent with the intent of the IFC Performance Standards* by January 2024.

In order to satisfy this requirement, CBG has undertaken a gap analysis (comparing current operations against the IFC PSs) and developed a 'Road Map'. The latter outlines a set of major milestones (based upon actions, timeframes, and interim deliverables) required to achieve the deadline of January 2024, and in many cases specifies clear deadlines for the completion of actions specified in existing E&S management plans.

CBG has contracted the services of an external consultant to work closely with CBG departments to establish a single Integrated Management System. The IMS is intended to integrate IFC PSs and also additional requirements for CBG's membership of the ASI in 2023. The Road Map will be a key element of the IMS and includes, *inter alia*, the following elements:

- Schedule of activities;
- Key Performance Indicators (KPIs);
- Resourcing requirements; and
- Progress monitoring (tracked graphically against a pre-determined schedule leading up to January 2024).

These elements will be recorded in a colour coded 'dashboard' and progress will be reported on a monthly and quarterly basis via steering committee meetings and senior management meetings respectively.

Moving forward in Q2 2022, CBG will produce a matrix of roles, responsibilities and accountabilities needed to implement the Road Map/work towards the establishment of the IMS and will combine this matrix with a review of the HSECQ organisation chart.

The IESC welcomes the work undertaken to develop the Road Map and consolidate working practices within a single IMS. The ownership of actions for individuals outside of the HSECQ Department, a clear schedule for action items specified in existing E&S management plans and clear reporting requirements to Senior Management should result in positive progress and corrective actions where progress slips behind schedule.

## 5.5 NoCo Exploration Campaign

As reported in Section 3.4, currently there has been no decision taken to mine the North of Cogon concession area. In the event that a decision is taken to mine the North of Cogon concession area, activities will be subject to the full regulatory Environmental Impact Assessment (EIA) process, and international ESIA (if CBG is to seek international financing) and CBG's own E&S management process, including the LDP Procedure.

## 5.6 Environmental and Social Management Plans

### 5.6.1 Background

In the October 2021 Monitoring Report, the IESC highlighted the need to review existing environmental management plans (EMPs) and update the plans, where necessary, in line with the 2-year review cycle referenced in the plans. The IESC was informed that the plans would be updated in earlier 2022, coinciding with the March 2022 site visit. At the time of the site visit, however, the plans had not been updated and it is expected the update will occur later in the year. For certain plans, for example the Dredge Management Plan, a later schedule has been confirmed.

### 5.6.2 Management Plans: Progress Review of Action Plan implementation

#### *Environmental Management Plans*

As reported previously, the implementation of actions specified within EMPs is behind the schedule presented in late 2018/early 2019. This was attributed to various reasons, most notably the absence of an EMTL for the majority of 2020, COVID-19 restrictions and overly ambitious timeframes specified in the original management plans. Recommendations pertaining to the review and update of EMPs and associated Action Plan thus remain unchanged since previous site visits.

A revised approach and timeframe for the implementation of actions specified within the management plans, including a transfer of ownership to other departments and coordinators outside of HSECQ, multi-department steering committees, alongside a single tracking database and new reporting requirements to Senior Management, were detailed in the October 2021 Monitoring Report. Closely linked is the 'Road Map', described in Section 5.4, which provides a detailed schedule through to January 2024 (the deadline for the alignment of all CBG's operations with the intent of IFC PSs). In essence, the timeframes include in the Action plans are now redundant and have been replaced by the Road Map.

In the October 2021 Monitoring Report, a protracted procurement process was highlighted as a key reason for the slow implementation of actions in the management plans. Whereas progress with the implementation of key actions has recently been made (described throughout this chapter), the slow procurement process has caused problems not only for the environmental team, but other departments. It is therefore considered a systemic problem. The IESC therefore recommends a detailed review of CBG's current procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services.

## 5.7 Management of Change

Previous IESC Monitoring Reports have described the poor implementation of the CBG Management of Change (MoC) Procedure. The IESC has also reported on a number of initiatives to disseminate and reinvigorate the MoC procedure. More recently (October 2021), the IESC reported on CBG's plans to appoint a new MoC Coordinator, introduce mandatory monthly reporting, centralise the MoC register and audit the implementation of the Procedure, amongst other actions.

As of the March 2022 site visit, a new MoC Coordinator had recently been appointed and the MoC Procedure had undergone a review by the HSECQ Department, resulting in a number of recommendations relating to the update of the MoC procedure, the appointment of MoC Champions, staff training and a further roll out of the Procedure.

However, the poor implementation of the MoC Procedure to date, reported in this and the previous IESC Monitoring Reports, remains a significant issue. Weak adherence to the requirements of the MoC Procedure has also been identified following an internal review of CBG's Management Systems under ESAP Item 1 and following an inspection of CBG's operations by an ALCOA delegation (primarily made in response to occupational health and safety – OHS – fatalities in 2021).

Whereas there has been some progress since the previous site visit, CBG is still failing to implement this Procedure. Consistent with comments made in previous reports, this issue is elevated to a 'High' significance level until the IESC sees evidence that the MoC Procedure is applied across CBG's various functions and contractors.

In addition to the actions proposed by the CBG HSECQ team, the IESC further recommends:

- That the new Operations Director assumes an overall responsibility for expediting the implementation of the MoC Procedure, noting that a MoC procedure is standard practice and considered essential to CBG's day-to-day operations (and is not a management tool intended to solely address HSECQ and Lenders notification/reporting requirements as per an ESAP commitment).
- Systems are put in place to make adherence to MoC procedure mandatory. Responsibility for the MoC Procedure should not sit solely with the HSECQ Department, but should instead have multi-department ownership, including the involvement of the Procurement Department.

## 5.8 Dredging

Dredging has been necessary in each of the years since 2016 with volumes ranging from approximately 236,000 to 703,000m<sup>3</sup>. The last dredging campaign, undertaken in Q3 2021, involved the dredging of 327,000 m<sup>3</sup> of material, which was less than originally planned as a result of ecological based seasonal constraints. Dredged material was deposited at the same site used in previous campaigns, referred to as the A3 Disposal Site.

The table below provides the findings from the previous Monitoring Report and updates as of March 2022.

**Table 5-1: Status Update for Dredging-Related Findings identified in the October 2021 IESC Monitoring Report**

Finding in October 2021 Monitoring Report	Status in March 2022
<p><i>Environmental characterization of sediment from the dredging area:</i></p> <p>Sediment samples were collected from the dredging area; however, they were not analysed prior to the start of dredging activities because contracts with external laboratories were not in place. Of note, toxicity testing might be required if samples are found to have high concentrations of contaminants. Samples were not collected from the disposal area.</p>	<p>Contacts with external laboratories are in place.</p> <p>Geochemical characterisation of sediments at both the A3 Disposal Site and the currently unused A4 disposal sites (sampling carried out by divers). The need for bioassay to be decided in mid-2022.</p>

Finding in October 2021 Monitoring Report	Status in March 2022
<p><i>Characterisation of the benthic fauna from the dredging area and disposal area prior to dredging:</i></p> <p>A marine survey team is currently on site working on a 1-year survey programme as part of CBG’s wider biodiversity management programme. This team was not in place at the time of the dredging campaign and, as such, no benthic survey was undertaken prior to dredging.</p>	<p>Marine survey currently in progress.</p>
<p><i>Underwater noise measurements:</i></p> <p>No underwater noise measurements were undertaken during the dredging campaign.</p>	<p>Noise monitoring is planned for the 2022 dredging campaign.</p>
<p><i>Review of Dredging Management Plan (DMP):</i></p> <p>The DMP was prepared in 2018 and requires review and revision to reflect any changes in CBG’s approach to dredging. Any changes to the DMP need to follow the MoC Procedure and be subject to Lenders’ approval.</p>	<p>Review of the DMP scheduled for September 2022.</p>

The 2022 dredging campaign is scheduled for Q3, 2022. A total of 730,000m<sup>3</sup> of sediment is expected to be removed from the port area, more than double that achieved in the 2020 and 2021 campaigns. CBG’s intention is to again use the A3 Disposal Site.

Evidence presented during the March 2022 site visit confirms that CBG is acting on the findings and recommendations made by the IESC in previous Monitoring Reports. Dredging performance will nevertheless be revisited in the next site visit when the results of the chemical analysis of disturbed sediments and the benthos survey are available.

## 5.9 Contractor Management and the Integrated Management System

The IESC’s has previously reported on implementation of the Contractor Management Plan (CMP) with respect to incorporation of HSECQ requirements in CBG’s procurement process, noting that CBG has not yet undertaken all actions needed to implement the plan fully. During the October 2021 VSV, CBG provide an update on actions currently underway/ planned in order to apply the CMP effectively. One of the key actions reported at the time was the planned appointment of a CMP Coordinator to be responsible for:

- Ensuring existing and new contractor compliance with CMP (checking KPIs and implementation of an audit programme);
- Establishing and maintaining a contractor monitoring register;
- Supporting contractors with incident reports and implementation of remedial action plans; and
- Reinforcing HSECQ capabilities in the procurement process and ensuring that HSECQ and LWC requirements are incorporated into the contractor selection process.

At the time of the March 2022 site visit, the appointment of a CMP Coordinator had been made and was present at the time of the IESC’s visit. Although recently appointed, the Coordinator appears to understand the role and associated tasks needed to ensure contractor awareness and compliance with the CMP. The Coordinator has ownership/responsibility for implementation of

the CMP; this appointment is welcomed as the CMP had previously did not sit with a designated responsible individual.

Bidding contractors are provided with CBG's HSECQ Minimum Standards (updated in July 2021 and previously described in earlier IESC Monitoring Reports) that they are expected to meet. The selection of a contractor is made by a selection committee that includes HSECQ representation and an assessment of HSECQ capacity. The weighting given to HSECQ capacity varies by contract depending on the level of HSECQ risk associated with the awarded contract. Where minimum requirements are not met a bidder is disqualified from the process. In certain circumstances, bidders that narrowly meet the Minimum Expectations will be given additional support from CBG following award of contract. In such situations it is the IESC recommendation that any extra measures needed to improve a contractor's HSECQ understanding/capacity must be front end loaded i.e. occur before work on execution of the contract commences.

The IESC has previously recommended the involvement of the HR Department in the selection of new contractors, primarily to ensure PS2 requirements pertaining to worker rights are considered. The CMP Coordinator informed that involvement of the HR Department in the contractor selection process remains an outstanding action that now sits with the Coordinator. The CMP is dated December 2018 and should be revised to reflect *inter alia* the role and responsibilities of the Contractor Management Coordinator and the HR Department (the latter having been recommended in the past – see Appendix 3, IESC Report Issued Oct 2021\_008).

Current CBG does not have a list of preferred (pre-approved) contractors, however it does have plans for such a list to be created following the appointment of the CMP Coordinator.



**Table 5-3: Summary of Findings, PS1**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2022_001	CR Team: Resources	Most of the engagement activities (and thus grievances) are taking place in Sangarèdi. The distribution of members of the team between Sangarèdi and Kamsar does not correspond with the actual workload. Engagement activities in Sangarèdi currently require additional resources due to volume of activities being undertaken.	All	Consider revisiting current staff distribution between Kamsar and Sangarèdi. Some of the senior positions currently located in Kamsar should be placed in Sangarèdi along with the incoming recruitment.	<b>Moderate</b>
March 2022_002	CR Team: Resources	Ongoing performance issues with the Isometrix database, thus necessitating the purchase and installation of a dedicated server in Kamsar.	All	The purchase and installation of a dedicated server in Kamsar is now considered to be a priority in order to alleviate performance issues related to the Isometrix database (e.g. slow functioning) and enable it to be used to its full potential.	<b>Moderate</b>
March 2022_003	CR Team: Resources	The CR Manager has been appointed to act as Resettlement Manager. This has been translated into an increase in workload for the CR Manager.	All	The recruitment of a permanent Resettlement Manager is a priority.	<b>Moderate</b>
March 2022_004	SEP and Grievance Management Mechanism	The 2022-25 SEP and GMM need to be revised by CBG as per the IESC's/Policy Lenders remarks.	All	CBG to revise and update SEP and GMM as per the IESC's remarks. <i>Post visits note: Draft SEP and GMM updated and near finalised.</i>	<b>Moderate</b>
March 2022_005	Management of Change	Limited progress has been made since the previous October 2021 Monitoring Report in terms of the wider understanding and implementation of the MoC Procedure.	All	CBG should continue to finalise the MoC Action Plan and roll out the measures therein as a matter of priority.  In addition, the IESC further recommends that: <ul style="list-style-type: none"> <li>• The new Operations Director assumes a direct responsibility for expediting the implementation of the MoC Procedure.</li> <li>• Systems are put in place to make adherence to management of change</li> </ul>	<b>High</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				mandatory. For example, purchases could be blocked unless evidence is provided that change management was considered as part of any Purchase Order approval.	

Certain findings from early IESC monitoring visits are yet to be closed including findings relating to the revision of EMPs, SMPs, dredging, elements of the Environmental Monitoring Programme, stakeholder engagement and grievances. These 'open' legacy findings are provided in Appendix 3 of this report.

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

### 6.1 Introduction

This March 2022 site visit report focuses on the following topics pertaining to labour and working conditions:

- OHS performance;
- OHS training;
- Risk management and control of work;
- Incident investigations and root cause analysis;
- Maintenance and asset management;
- COVID-19;
- Personal Protective Equipment (PPE);
- Leadership, commitment and communication;
- Contractor safety management; and
- Occupational health and safety (including COVID-19 measures).

Key findings are presented on each of these topics below.

#### 6.1.1 General Limitations

The IESC's monitoring of issues pertaining to labour and working conditions provide snapshots in time, based on observations made during the March 2022 site visit, interviews, and review of documents shared at, or shortly after, the time of the site visit. The conclusions presented in this report represent the IESC's professional judgement, based upon the information available and conditions existing as of the time of the March 2022 site visit.

### 6.2 Occupational Health and Safety

#### 6.2.1 OHS Performance

Prior to the March 2022 monitoring visit the IESC has been unable to visit CBG's facilities since 2019 to inspect safety practices first-hand because of COVID-19 and security related travel restrictions. Consequently, the IESC monitoring team was expanded to allow a greater focus on OHS performance. The need for dedicated OHS resource was further prioritised following 3 worker fatalities in 2021 in which incident investigations revealed several serious safety breaches.

A further 8 serious non-fatal incidents were also recorded in 2021 including 2 lost time injuries, 3 restricted work cases and 3 medical treatment cases. These non-fatal accident figures compared favourably with the 2020.

CBG is tracking and reporting on a host of lagging indicators such as fatalities, lost time incidents and medical treatment cases. Performance is tracked on a month-by-month basis and is reported to Senior Management. Statistics on near misses are aggregated with safety observations (e.g. of unsafe acts and unsafe conditions), which effectively causes distortion in reporting of a possible leading indicator.

**Recommendation 1 – classification of OHS events** – CBG should disaggregate the data on high potential near misses from safety observations to provide an accurate report on actual near misses and to track trends for these events. *Post visit note: Since the site visit, CBG readjusted*

*the content of the various health and safety reports: near misses, unsafe acts and unsafe conditions and events actual or potential seriousness are analysed (and the action plan followed).*

**Recommendation 2 – leading indicators** – CBG should identify and track a suite of leading indicators (e.g. events with high severity potential, completion rate for mandatory training, closure rate for corrective actions, number of near misses) that provide a clear understanding of safety-related issues before they develop into significant incidents.

### 6.2.2 OHS Training

During the March 2022 site visit, the IESC confirmed that the training management plan is operational and updated by the OHS Team. Training on a variety of safety topics (e.g. confined space, falling from heights, electrical safety, lifting operations) have been provided to personnel by an external trainer. CBG has identified 48 personnel to undertake Train-the-Trainer qualification course as part of developing in-house capacity to provide internal HSE trainings.

*Post visit note: the same training company was requested again by CBG to train 1500 people (employees and permanent contractors): OHS general induction, CACES (Certificates of Aptitude for the Operation of Safety Equipment), electrical safety and Train-the-Trainer module 2.*

The external trainings were provided on the basis of workplace risks and job-specific hazards. However, there is no system for tracking out-of-date certifications and training courses. The tool used to monitor training is basic, being based on a simple Excel table. The IESC understands the Isometrix database will be configured for safety aspects management including a specific training component in addition to the management of incident/action reporting, inspections, audit, action plan and investigations. See also commentary about Isometrix in Section 5.1.3.

The Procedure for Induction & Training (Document No.: 111\_HSE 09), explain the training strategy of CBG (e.g. responsibilities of OHS Managers and Managers). However, the training plan shared during the site visit didn't target leaders or OHS Team.

In-house safety inductions are also organised and facilitated by members of the H&S Team. The CBG Golden Rules are not presented in the safety induction and there was a general lack of awareness among employees and contractors. Moreover, the employee understanding of the safety induction is not verified by a comprehension test, for example, a Q&A test. Such a means of verification should be included as part of the induction training.

**Recommendation 3 – training management** – establish an appropriate system or more efficient tool (e.g. automatic reminders for refresher training, tracking out-of-date certifications, list of employees eligible for training based on roles). This will ensure that only personnel with up-to-date certifications and training are assigned to perform critical operational and maintenance tasks.

**Recommendation 4 – Safety Leadership Training** – as mentioned in the Induction & Training procedure, the training plan should include specific training for OHS Teams and for Managers.

**Recommendation 5 – Golden Rules and safety inductions** – The Golden Rules should be presented at all safety inductions and periodically to both direct employees and contractors/subcontractors. Safety inductions, like all internal and external training exercises, must be verified by a Q&A or a comprehension test at the end.

### 6.2.3 Risk Management and Control of Work

During the March 2022 site visit to the active mine, railway and the Kamsar plant, the IESC confirmed the presence of a large H&S team on the ground, comprising both CBG and contractor personnel. HSE personnel have been designated to provide support to operations and to supervise contractor activities.

On the active mine, the contractor (Nitrokemine Guinée - EPC Goupe) in charge of the blasting operation used a drone with an on-board camera to check the area immediately before and after blasting.

The following concerns and areas for improvement in terms of OHS performance at the active mine, railway and Kamsar plant are as follows:

*Blasting Operations (under the responsibility of Nitrokemine Guinée - EPC Goupe)*

- HSE documents are not available on site with the operators (a CBG contractor);
- There is no formal check by CBG of what was checked by the contractor before validating the blasting; and
- In terms of contractor use of the radio to communicate and inform CBG, the contractor and CBG do not follow a formal/written procedure to confirm that messages have been received by all personnel present at the mine at the time of blasting.

**Recommendation 6 – blasting operation** – An official and more-structured control system (including a checklist for the contractor and checklist for CBG) should be established for use before and after blasting and kept on site. CBG need to confirm that all personnel present at the mine are aware before validating the blasting.

*Surface Miner (BereMat company)*

- HSE documents are not available on site with the operators (a CBG contractor);
- The contractor (who was working on the mine during the blasting) was not aware that there had been a blasting in the morning (even though they have a radio with them);
- There was no evidence of CBG control or supervision at the time of the March 2022 site visit;
- The contractor's employees next to the surface miner were not wearing hearing protection.
- **Recommendation 7 – surface miner** – the contractor needs to have (on site) HSE documentation relevant to ongoing site operations/activities and require their employees to wear hearing protection on site.

*Traffic at the Mine*

- Each truck is equipped with Global Positioning System (GPS) devices with real-time tracking from control screens at the mine control centre (PCC). This is commendable, allowing location and speed to be tracked for example, but in itself not enough, as GPS devices were already installed before the fatality involving a driver of a truck which occurred in April 2021. A test phase of facial recognition devices for fatigue, telephone usage and smoking whilst driving has recently begun with a warning system in the truck cab.
- The presence of many third parties at the active mine (e.g. pedestrians, including children, motorbikes, cars) was observed at the time of the March 2022 site visit.
- There is no separation between community traffic lanes and mine haul roads.
- There are no markings/signs at each intersection with community lanes.
- Truck drivers are informed of the loading and unloading location. They do not, however, have a clear understanding of the traffic plan outlining open or closed mine haul roads. The road markings and signs on site are either degraded or non-existent.

**Recommendation 8 – traffic on the mine** – physical separations between community traffic lanes and mine haul roads and install markings/signs informing of the danger and prohibition to cross. Reinforce road signs for mine trucks and a way to improve drivers' knowledge of the traffic plan needs to be identified and implemented.

The success of the facial recognition technology in identifying poor driver performance, for example, fatigue, will need to be evaluated following completion of the test phase and rolled out more broadly if found to reduce traffic risks.

#### *Kamsar*

A number of safety related observations were made during a walk over of the Kamsar Plant. These are listed below:

- There is a lack of maintenance of equipment, including moving/rotating parts (PIT: no auto detection if gate open);
- Certain fire extinguishers were out-of-date at the time of the March 2022 site visit with respect to periodic inspections;
- Regarding the “Déferailleur”, the carter is missing or defective (see Figure 6-1 below);
- The door to an electrical transformer was found to be open at the time of the March 2022 site visit;
- Not all emergency stops are easily accessible as the machines are in motion (e.g. rotating machines near conveyors);
- No emergency exercises are undertaken with respect to train unloading;
- There are limited traffic signs on site or signs with the mandatory PPE reminders;
- Fire hoses were observed to be broken and lying on the floor (see Figure 6-1 below);
- A safety guard had been removed from rotating equipment (See Appendix 2, Photo 27);
- There are no lifelines in the settling lakes; and
- The many culverts (at risk of falling) are not marked and there were no barriers installed at the time of the March 2022 site visit (only warning tape was in place in some areas).



**Figure 6-1 “Déferailleur”(Carter Missing or Defective) and Fire Hoses Broken on the Floor**

- Documentation process:
  - Task-specific job safety analysis and Take5 assessments, including permits to work, have been implemented by CBG for those tasks recognised as having fatal risk potential. However, it is noted that the implementation of the permit to work system bears some inconsistencies with best practice regarding the approval and maintenance of required documentation. For instance, the HSEC team (including the Acting HSECQ Director) are involved in the approval of permits work at issuance, yet they are also responsible for auditing the same system against established procedures, which is a direct conflict of interest. There are instances where task-specific job safety analysis (JSA) and Take5 assessment documentation were not found with, or alongside, approved permits to work (PTW) at the two control rooms in Kamsar, which represents a disjointed implementation of control of work requirements.
  - There are no site-wide baseline risk assessments of operations; for instance, there are no man-machine interaction risk assessments at both Sangaredi and Kamsar, and no operational procedures for the Burner Management System (BuMS), amongst others.
- Lifting operation on jetty:
  - HSE documents (lift plan, Take5, PTW, task risk assessment) were not available on site with the operators;
  - There was inadequate signalling or safety barriers in the workplace; and
  - There is no information on site about the lifting slings or the hoisting loads. The lifting slings used for this operation were not colour-coded (a new procedure for identifying lifting equipment is currently being implemented with a colour-coded system linked to the testing date).
- Waste storage (Tora bora):
  - There is no fire blanket, the fire extinguisher is not controlled<sup>11</sup> (there is no labelling), and there is no first aid kit in the waste storage area; moreover, the 1200 litre fuel storage tank is inappropriately located between the two incinerator containers and the wrong PPE was in use (e.g. failure to use safety boots);

<sup>11</sup> Review of an internal inspection of the Tora Bora workplace in September 2021 identified non compliances relating to fire extinguishers. It therefore appears there is a problem with the implementation of corrective actions.

- There are no facilities for workers (a containerized office was locked at the time of the March 2022 site visit) reportedly because utilities had not been connected rendering the facility unavailable;
- No HSE documents are available in the work areas (e.g. Take5 assessments, permit to work approvals, task-specific job safety analyses);
- The HSE team performs weekly inspections of the plant but doesn't formalise these if there are no observations/findings;
- Take5 assessments are not signed by all personnel on site.

**Recommendation 9 – risk management and control of work** – HSE documents must be kept in the workplace at all times, the frequency and media of communication regarding the CBG Golden Rules needs to be increased and improved, the use of protective casing/safety guards for critical equipment (e.g. rotating machines) needs to be improved (see Photo 27, Appendix 2).

**Recommendation 10 – risk management and control of work** – CBG should update its permit to work procedure to ensure that suitably qualified operations personnel are responsible for permit issuance, approval and post-completion review of tasks. The HSEC teams should strictly perform compliance assurance against the established control of work standards. This is critical to driving line management accountability for the safe conduct of high-risk activities.

**Recommendation 11 – risk management and control of work** – CBG should complete operational procedures where these are missing, such as for the burner Management System, as well as prepare baseline operational risk assessments, prepare a risk register and communicate these to all personnel (both direct employees and contractors). The MUOA Project risk register should also be updated.

**Recommendation 12 – risk management and control of work** – CBG should prioritise completing a man-machine interface risk assessment and implement appropriate engineering and administrative controls to achieve safe segregation of pedestrians and mobile machinery/equipment at Kamsar and Sangaredi.

#### 6.2.4 Incident Investigations and Root Cause Analysis

- CBG has implemented the Incident Cause Analysis Method (ICAM) System for the investigation of work-related incidents. However, a review of two fatal injury incidents (concerning electrician burned by arc flash and a night guard struck by a dump truck) by the HSEC team observed that pertinent organisational root causes were not captured, which is not a fault of the system but related to less rigorous analysis of pre- and post-incident events and conditions by investigation team members.
- In addition, it was noted that some corrective actions resulting from the investigations of fatalities that occurred in 2021 have either not been completed or not yet started. This delay means that those risks and hazards that led to the critical incidents have not been fully mitigated, hence there is a higher likelihood of reoccurrence of similar serious events. Investigations of all incidents are typically led by HSEC team.

**Recommendation 13 – incident investigations and root cause analysis** - CBG should define the composition of the team in charge of incident investigations and root cause analysis (HSEC, Worker, Manager, Direction, members of a workshop or similar facility...) and train them.

**Recommendation 14 – incident investigations and root cause analysis** - CBG should ensure prompt closure of corrective actions following approval of incident investigation reports. Concrete efforts and resources should be provided for timely close out of pending actions arising from the 2021 (and any future) significant incidents.



### 6.2.5 Maintenance and Asset Management

- At the Kamsar Control Room, continuous beeping was observed from the fire alarm control panel during the March 2022 site visit but nobody in the Control Room seemed concerned, nor was there any indication of any planned action to remedy the fault.
- A review of the 2021 electrical fatality investigation report noted that the 6kV protection system at the MV switchgear did not operate or function as intended as there were “known issues with the protection system which had not been resolved”. There are critical safety challenges to managing and maintaining aging assets and a lack of robust maintenance and asset integrity system can result in significant safety events.
- The external audit of the electrical installations had not yet been performed at the time of the March 2022 site visit, though a call for tenders is reportedly underway.

**Recommendation 15 – maintenance and asset management** - CBG should review maintenance and asset integrity in detail (including electrical installation and moving/rotating equipment) and expedite safety critical maintenance works.

### 6.2.6 COVID-19

Procedures for minimising the risks of COVID-19 transmission have been described in earlier Monitoring Reports and are thus not repeated here. However, it is noted that:

- Two COVID-19 related deaths are reported by CBG, concerning an employee and an employee’s dependent. Over 98% of CBG’s employees have been vaccinated.
- COVID-19 restrictions at the national and international level are being relaxed and simplified so there should be less impact on CBG's activities.

### 6.2.7 Personal Protective Equipment

The difficulties associated with procurement of PPE has been described in earlier Monitoring Reports and are not repeated here. However, with the relaxation in COVID-19 restrictions, obtaining goods sourced from overseas should also be simplified.

### 6.2.8 Leadership, Commitment and Accountability

- CBG representatives pointed out during the March 2022 site visit that the organisation is taking steps to implement line responsibility for HSE. In particular, to be informed of all HSE events and to perform regular on-site inspections. A schedule of audits to be carried out by management staff has recently been approved but no audit reports for 2022 have been forwarded to the IESC. The 2021 managers' audits have generated many actions, not all of which have been closed and not all of which are gathered in one register.
- Some of the staff and contractor personnel interviewed were unable to articulate CBG’s HSEC policy and Golden Safety rules, an indication that further work is required in terms of workforce engagement to create an organisational culture that values health and safety.
- A consultant has been hired to re-design the roles and responsibilities matrix for the CBG but this is primarily focused on the HSEC team composition.
- CBG now also requires “safety shares” at the start of every meeting. This is a commendable endeavour. However, during the March 2022 site visit, the sharing of safety shares were only undertaken by 'non-HSE' employees. Moreover, safety shares, where presented, highlighted ‘problem identification’ rather than offering tangible solutions to correct non-compliances. Greater focus is required on solutions thereby encouraging effective safety conversation and site-wide learning.

- Due to the language used in HSE documents or during HSE meetings/discussions (English, French or local languages), some confusion or misunderstanding could be observed during interviews and whilst making observations on site.

The IESC was also informed that job responsibilities will have an increased emphasis on H&S responsibilities and future bonuses for individual managers will be influenced by H&S performance

**Recommendation 16 – leadership, commitment and communication** –all inspection actions need to be compiled in a single register to facilitate processing and follow-up by the HSE team (with reminders to the action leaders).

**Recommendation 17 – leadership, commitment and communication** - CBG should utilise the re-design of roles and responsibilities exercise to establish clear accountabilities, specific, measurable, attainable, realistic and time-bound (SMART) performance objectives and responsibilities for HSE matters for all levels of senior management and supervisory teams, based on well-defined authority levels that can deliver safe and reliable operations and practically bring about the needed HSE leadership and accountability to line management (outside of the HSECQ Department).

**Recommendation 18 – leadership, commitment and communication** - In addition to employee safety sharing, the HSE team should provide a prepared safety shares library with lessons learned and actions already identified (preferably linked to the relevant CBG Golden Rules).

**Recommendation 19 – leadership, commitment and communication** - CBG should clarify the language for the HSE system. All communications and training should be in French (the official language of the country and of the Labour Code), but it may be necessary to make some communications in local languages in order to increase understanding amongst all personnel.

#### 6.2.9 Contractor HSE Management

The existing contractor management plan is under review and CBG has identified an internal manager in charge of contractors. CBG required the close involvement of an HSE representative within each of its contractors, minimum OHS expectations (with an action plan for pre-mobilisation, and post-mobilisation/-execution phases) and arrangements for monitoring and verification processes (to assure compliance of contractors with HSE Plans and Environmental and Social Management Plan (ESMP) commitments). However, some important aspects are not yet sufficiently addressed as follows:

- Capability assessment of contractors;
- Process for risk ranking;
- Profiling potential contractors based on HSE strengths and weaknesses.

Systra (main contractor under MUOA Project) performs inspections on site, but related concerns and areas for improvement are as follows:

- The audit scores are poor (<60%) but there are no systematic associated actions;
- Systra doesn't track its actions digitally;
- The inspections were performed in September/November 2021 and February 2022 (with no new control audit in the interim period);

**Recommendation 20 – contractor HSE management** – Finalize the contractor management plan and the capability assessment of contractors

**Recommendation 21 – contractor HSE management** – Systra should digitise the tracking closure of actions and assign levels of importance to impose an appropriate time for the correction of actions and possible associated sanctions (with the highest level being to stop work).

**Table 6-1: Summary of Findings, PS2**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2022_006	OHS Performance	Management of leading indicators (near misses and safety observations) is insufficient.	All	<ul style="list-style-type: none"> <li>Classification of OHS events - CBG should disaggregate the data on high potential near misses from safety observations to provide an accurate report on actual near misses and to track trends for these events.</li> <li>Leading indicators - CBG should identify and track a suite of leading indicators (e.g. events with high severity potential, completion rate for mandatory training, closure rate for corrective actions, number of near misses) that provide a clear understanding of safety-related issues before they develop into significant incidents.</li> </ul>	<b>Moderate</b>
March 2022_007	OHS Training	<p>The training management tool is not adapted to CBG; there is no system for tracking out-of-date certifications and training courses and the tool used to monitor training is too basic.</p> <p>There is no formal verification of trainees' understanding at the end of safety induction training.</p>	All	<ul style="list-style-type: none"> <li>Training management – Establish an appropriate system or more efficient tool (e.g. automatic reminders for refresher training, tracking out-of-date certifications, list of employees eligible for training based on roles). This will ensure that only personnel with up-to-date certification and training are assigned to perform critical operational and maintenance tasks.</li> <li>Golden Rules and safety inductions – The Golden Rules should be presented at all safety inductions and periodically to both direct employees and contractors/subcontractors. Safety inductions, like all internal and external training exercises, must be validated verified by a Q&amp;A or a comprehension test at the end.</li> <li>The training plan should include specific training for OHS Teams and for Managers.</li> </ul>	<b>Moderate</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
March 2022_008	Risk Management and Control of Work	Low control of OHS risks during the execution of tasks, as confirmed by numerous findings during site visits (including in relation to blasting operations, surface miner, traffic on the mine, railway, waste storage (Torabora), lifting operation on jetty, Kamsar Plant)	All	<ul style="list-style-type: none"> <li>• Blasting operation:                             <ul style="list-style-type: none"> <li>○ An official and more-structured control system (including a checklist for the contractor and checklist for CBG) should be established for use before and after blasting and kept on site. CBG need to confirm that all personnel present at the mine are aware before validating the blasting.</li> </ul> </li> <li>• Surface Miner:                             <ul style="list-style-type: none"> <li>○ The contractor needs to have (on site) HSE documentation relevant to ongoing site operations/activities and require their employees to wear hearing protection on site</li> </ul> </li> <li>• Traffic on mine:                             <ul style="list-style-type: none"> <li>○ Physical separations between community traffic lanes and mine haul roads need to be provided whilst clear markings/signs, informing individuals of the danger and prohibition to cross, need to be established/installed. Road signs for mine trucks need to be reinforced and a way to improve drivers' knowledge of the traffic plan needs to be identified and implemented.</li> </ul> </li> <li>• Kamsar Plant:                             <ul style="list-style-type: none"> <li>○ HSE documents must be kept in the workplace at all times, the frequency and media of communication regarding the CBG Golden Rules needs to be increased and improved, the proper use of safety guards on moving equipment needs to be improved.</li> <li>○ CBG should update its permit to work procedure to ensure that operations personnel are responsible for permit issuance, approval and post-completion review of tasks. The HSEC teams should strictly perform compliance assurance</li> </ul> </li> </ul>	<b>High</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				<p>against the established control of work standards. This is critical to driving line management accountability for the safe conduct of high-risk activities.</p> <ul style="list-style-type: none"> <li>○ CBG should complete operational procedures where these are missing, such as for the BuMS. as well as prepare baseline operational risk assessments, prepare a risk register and communicate these to all personnel (both direct employees and contractors). The MUOA Project risk register should also be updated.</li> <li>○ CBG should prioritise completing a man-machine interface risk assessment and implement appropriate engineering and administrative controls to achieve safe segregation of pedestrians and mobile machinery/equipment at Kamsar and Sangaredi.</li> </ul>	
March 2022_009	Incident Investigations & Root Cause Analysis	Concreted efforts and resources should be provided for timely close out of pending actions arising out of the 2021 significant incidents.	All	<ul style="list-style-type: none"> <li>• CBG should define the composition of the team in charge of incident investigations and root cause analysis (HSEC, Worker, Manager, Direction, members of a workshop or similar facility...) and train them.</li> <li>• CBG should ensure prompt closure of corrective actions following approval of incident investigation reports. Concrete efforts and resources should be provided for timely close out of pending actions arising from the 2021 significant incidents.</li> </ul>	<b>High</b>
March 2022_010	Maintenance & Asset Management	Poor maintenance of equipment (safety technologies upgraded slowly).	All	CBG should review maintenance and asset integrity in detail (including electrical installation and moving/rotating equipment).	<b>High</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
March 2022_011	Leadership, Commitment and Accountability	<p>Since March 2021, findings indicate that there is low or no continuous improvement of the management system (reactive, not proactive).</p> <p>CBG should commit to create an organisational culture that values health and safety.</p>	All	<ul style="list-style-type: none"> <li>All inspection actions need to be compiled in a single register to facilitate processing and follow-up by the HSE team (with reminders to the action leaders). All findings must be closed in a timely manner.</li> <li>CBG should utilize the re-design of roles and responsibilities exercise to establish clear accountabilities, SMART performance objectives and responsibilities for HSE matters for all levels of senior management and supervisory teams, based on well-defined authority levels that can deliver safe and reliable operations and practically bring about the needed HSE leadership and accountability to line management.</li> <li>In addition to employee safety sharing, the HSE team should provide a prepared safety shares library with lessons learned and actions already identified (preferably linked to the relevant CBG Golden Rules).</li> <li>CBG should clarify the language for the HSE system. All communications and training should be in French (the official language of the country and of the Labour Code), but it may be necessary to make some communications in local languages in order to increase understanding amongst all personnel.</li> </ul>	<b>Moderate</b>
March 2022_012	Contractor Safety Management	CBG should finalize the contractor management plan and support contractors in their continuous improvement approach.	All	<ul style="list-style-type: none"> <li>Finalise the contractor management plan and the capability assessment of contractors.</li> <li>Systra should digitise the tracking of actions and assign levels of importance to impose an appropriate time for the correction of actions and possible associated sanctions (with the highest level being to stop work).</li> </ul>	<b>High</b>

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in Appendix 3 of this report.

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

### 7.1 Implementation of Environmental Management Plans

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

### 7.2 Environmental Monitoring

The October 2021 IESC Monitoring Report highlighted a number of priority actions, including: i) the relaunch of the comprehensive environmental monitoring programme; ii) improved data management via procurement of a new database; iii) recruitment of additional team member(s); and iv) disclosure of information to communities. A status update against each of these priorities is provided below.

#### 7.2.1 Relaunch of the Environmental Monitoring Programme

Analysis of samples has been significantly hampered since the cessation of contracts with external laboratories in late 2019, during which CBG has relied on the more limited analytical capabilities of its internal laboratories/equipment.

Since the time of the previous site visit, CBG confirmed a contract has been signed, allowing for the analysis of air quality samples. Separate contracts with other laboratories for: i) the analysis of water and sediments and ii) repair and maintenance of the fixed AQ monitoring station in Kamsar and meteorological stations in Kamsar and Sangarédi were in place at the time of the previous virtual site visit and remain in place.

The IESC previously commented on the positive progress made in agreeing contracts with laboratory services. This has allowed commencement and dispatch of environmental samples and receipt of some early monitoring results (discussed later in this section).

With regards to the air quality fixed monitoring station, consultants have visited the site to evaluate the nature of repairs necessary. The IESC understands the consultant will return in June 2022 to repair the sulphur dioxide (SO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>) sensors and replace the particulate matter monitor. Consequently, no data has been collected since the previous monitoring visit.

Supplementary new sound meters received in October 2021 have recently been joined by accessories (tripods and additional battery packs) thus allowing further noise measurements to commence. A new seismometer (needed to expand the scope of vibration measurements) is yet to arrive in Guinea. The interim, the current seismometer is largely devoted to the blasting programme).

Good progress has been made since the previous Monitoring Report, however CBG is still hampered by broken/lost equipment, for example, a lost Niskin Bottle used for sampling water at predetermined depths. It is therefore recommended that CBG 'doubles' up on its sampling equipment to ensure continuous ability to sampling. This recommendation is particularly important because of the delays experienced by the Environmental Monitoring team during the procurement of specialised monitoring equipment.



### 7.2.2 Recruitment of Additional Team Member(s)

In its October 2021 Monitoring Report, the IESC recommended that a Needs Analysis, considering evaluation of current and future resourcing levels, roles, and capabilities, be undertaken within the environmental management team in recognition of the anticipated increased workload. As of March 2022, additional equipment had been identified to support in the monitoring programme, but not staff resource. The IESC was informed that future resourcing needs will be the subject of a broader staffing review being conducted as part of the aforementioned Road Map (ESAP Item 1).

The IESC remains of the opinion that the team is under resourced and will revisit the issue of resourcing levels for the environmental team as part of a wider evaluation being undertaken under ESAP Item 1 Road Map. The IESC was also informed that recruitment of a consultant is planned for Q2, 2022 in order to support the EMTL in the update of the Environmental Management Plans.

### 7.2.3 Disclosure of Monitoring Results

The IESC has previously reported CBG's commitment within its management plans to disclose the results of its environmental monitoring to affected communities and the constraints faced because contracts were not in place with external laboratories. The IESC understands a protocol for disclosure of environmental monitoring results is being drafted and scheduled for finalisation in June 2022. It is expected that the protocol will satisfy both the requirements in current management plans and aligned with the requirements of the Aluminium Stewardship Initiative<sup>12</sup> (ASI). Consequently, CBG is not routinely reporting environmental monitoring results to community members with the exception of noise and vibration data for villages located in proximity of blasting/mine works and for drinking water quality (simple parameters).

Whereas progress, both in terms of CBG's ability to analysis environmental samples, and its preparation of a disclosure protocol is welcomed, disclosure to date remains limited and the IESC's earlier findings concerning the insufficient disclosure of results remains unchanged.

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<sup>12</sup> CBG is aiming for certification in 2023 but will produce a Sustainability Report that is compatible with ASI requirements in mid-2022. CBG will be supported by Alcoa and an external consultant when producing the Sustainability Report.

### 7.3 Air Quality

#### 7.3.1 Status of AQMP Implementation.

The Figure below provides a graphical summary of the status of implementation for the Action Plan that is embedded within the Air Quality Management Plan (AQMP). The graphic shows the planned timeline for completion of all the actions as per the overarching schedule defined in the Road Map (ESAP Item 1).

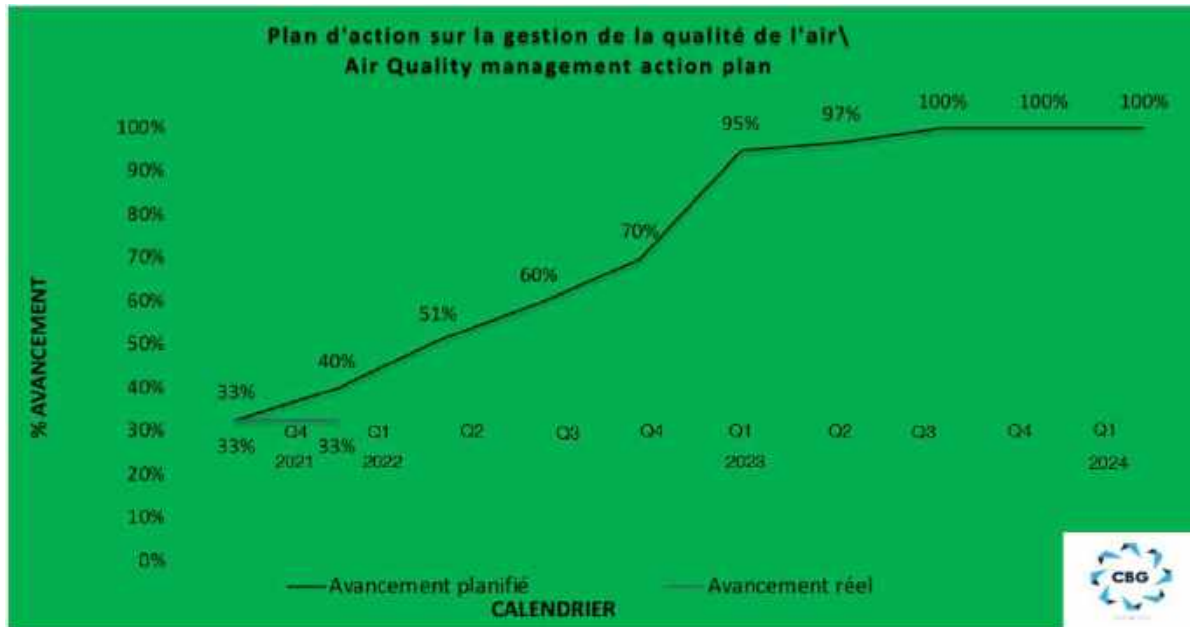


Figure 7-1. Status of AQMP in Q1, 2022

In the preceding March and October 2021 Monitoring Reports, the IESC reported on: i) Stack emission monitoring and finalisation of the AQMP; ii) ambient air quality monitoring; and iii) dust suppression. These issues are revisited in this report and status updates provided where applicable along with results of air quality monitoring conducted in late Q1 2021 and early 2022.

#### 7.3.2 Stack Emissions Testing and Finalisation of the AQMP

An Air Quality Management Plan (AQMP) was prepared in January 2019; however, the plan did not specify stack emission criteria for the dryer stacks in Kamsar. An agreement was made between CBG and Policy Lenders to revise the AQMP based on stack emission limits that were to be derived and then agreed with the Policy Lenders, noting that EHS General and Industry Sector Guidelines do not provide in-stack emissions limits that can be applied readily to bauxite dryers (see ESAP Item 13, Appendix 4). This agreement remained valid at the time of the IESC visit. A description of the work undertaken to date, including dry season stack emission monitoring is provided in the October 2021 IESC Monitoring Report and is not repeated here.

The IESC has previously reported on the difficulties faced by CBG in determining stack emission criteria. Again, these are not repeated in detail here but can be summarised as delays in collection of measured stack emission data caused by COVID-19 and security related travel restrictions in 2020 and 2021. Moving forward, the steps needed to define stack emission limits, and any additional measures to reduce stack emission remains largely unchanged as follows:

- Collect wet season emission data for all four dryers;

- Use dispersion modelling to determine impact/contribution of dryer stack emissions (collected in dry<sup>13</sup> and wet season conditions/different operating parameters) on ambient air quality;
- Run the dispersion model under varying emission scenarios to determine the benefits to ambient air quality if emissions are reduced;
- Using the model to back calculate emission limits (respecting ambient air quality objectives) and agree appropriate stack emission limits with the Lenders;
- Depending on the agreement reached with Lenders, implement corrective actions, including design changes to the current emissions abatement technology as necessary, to reduce stack emissions and therefore ambient air quality.

CBG has also developed a detailed action plan (hereafter referred to as the "Air Quality Corrective Action Plan" or "AQ CAP") that includes other works including an external audit of dryer maintenance procedures and operational procedures with an emphasis on the dust control system. The audits are scheduled for Q2 and Q3 of 2022 with any corrective actions identified via the audits to be actions within subsequent maintenance shut down periods (likely to be early 2023).

In line with ESAP Item 1, the intention is to have completed any corrective works to meet agreed emission levels by January 2024. However, the previously reported difficulties associated with stack emission monitoring (COVID 19 and security travel restrictions that prevented consultants travelling to Guinea) have made it unlikely CBG will be able to meet this deadline, in the event significant intervention works are required to upgrade abatement equipment. In this context, CBG should use all reasonable efforts to expedite the process in order to achieve the original timeframes, or be as close to it as possible, noting a number of actions can run in parallel. Specifically, the IESC recommends early appointment of an engineering design consultant under a preliminary scope of work (potentially the external audit identified within CBG's AQ CAP) to avoid any delays associated with consultant selection and award of contract, further noting that such processes can be protracted. The consultant's scope of work can then be amended once informed by corrective actions undertaken in 2022. The IESC recognises that successful implementation of the AQ CAP requires the involvement of multiple departments and therefore recommends responsibility for completion of the AQ CAP and ESAP Item 13 relating to revision of the AQMP sits with the Operations Director.

### 7.3.3 Air Quality Monitoring Data

As indicated in Section 7.2.1, CBG restarted ambient air quality monitoring following finalisation of new contracts with external laboratories/companies in late 2021. However, CBG has experience a number of difficulties in restarting the ambient air quality monitoring campaign, as follows:

- Repair of the fixed air quality monitoring station in Kamsar is ongoing, with consultants expected to complete the repairs in June 2022.
- Samples dispatched for analysis in late 2021 were lost in transit
- Equipment and consumables (filters) used for monitoring of particulates have been discontinued. New equipment is therefore being purchased.

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<sup>13</sup> In 2021, stack emissions testing was conducted during the dry season between 9 June and 24 June. The campaign included sampling of Dryers 2, 3 and 4, the incinerator at Tora Bora waste facility, certain engines stacks and the boiler at the Kamsar power station. Dryer 1 was not sampled because it was non-operational at the time of the dry season campaign (scheduled to restart in May 2022).

#### 7.3.4 Dust Suppression

The IESC has previously reported CBG's plans to use chemical suppressants on haul roads (rather than water alone) and the procurement of a bitumen emulsion dust suppressant for trials<sup>14</sup>. The outcome of the evaluation tests remains unclear: CBG has informed that studies to select the best approach for controlling dust from mine roads are ongoing. Once a decision is taken the details of any chemical dust suppressants to be used should be made available to the Lenders via the agreed Management of Change Procedure.

#### 7.3.5 Decommissioning of Electrical Generators, Kamsar

Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the Kamsar central powerhouse by 2020. The IESC understands the old generators are no longer being used, however, they have not been decommissioned. CBG has confirmed there is no intention to put the old generators back into service and that a decision to remove the power generators is under evaluation.

#### 7.3.6 Other priority actions schedule for 2022

In addition to the actions described above, key projects scheduled for 2022 include:

- Study of fugitive emission at the plant
- Establishment of a database to manage air quality data
- Ongoing study into use of chemical dust suppressants.

The IESC supports measures to understand and control fugitive emissions. During the site visit, significant amounts of accumulated dust was observed at the Kamsar facilities (Photo 25, Appendix 2) that is prone to resuspension in windy conditions (Photo 26, Appendix 2). Whereas the IESC recognises that CBG's operations are inherently dusty, efforts to minimise large accumulations of dust should be increased, and the potential application of dust suppressants at Kamsar evaluated following completion of the ongoing dust suppressant study.

### 7.4 Water Quality

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

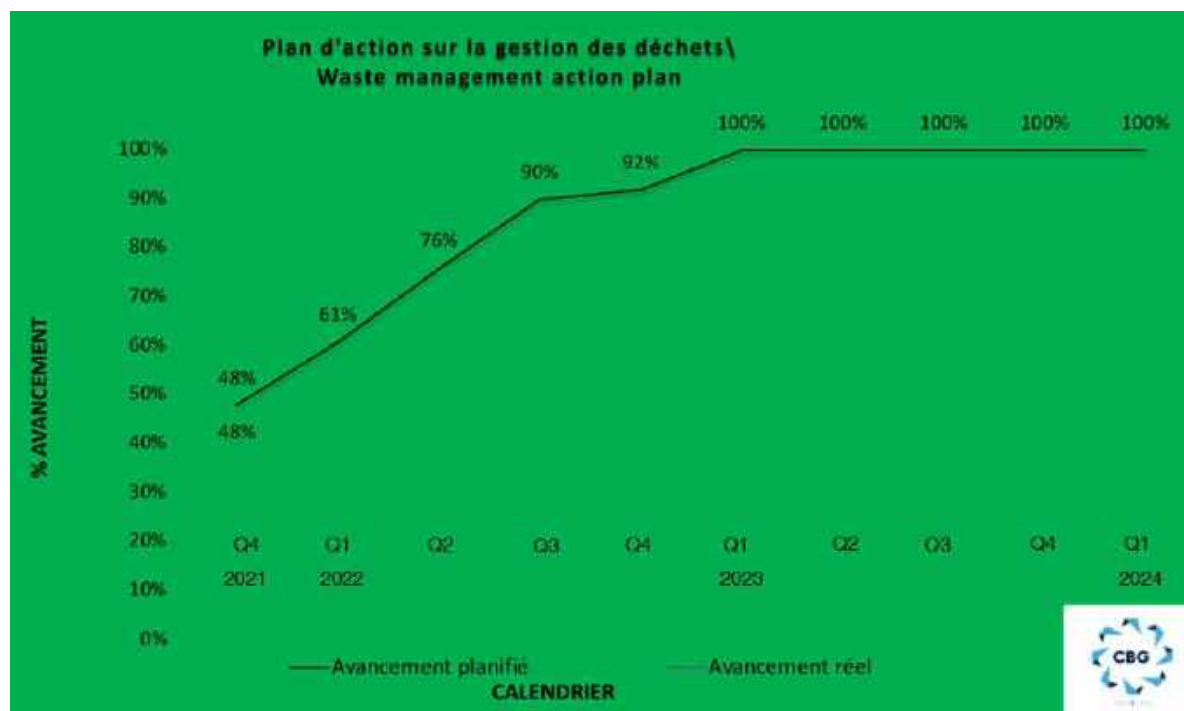
#### 7.4.1 Overview of Progress Against the Water Management Plan.

In the previous IESC Monitoring Report, implementation status of the Water Management Plan was broken down by status of actions split by responsible departments including HSECQ, Mine, Plant and Maintenance.

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<sup>14</sup> Product name is Anionic Bitumen Emulsion (SS60). MSDS states practically non-toxic, LC/EC50>100mg/l, although should be kept away from watercourses.

The IESC has previously reported that implementation of actions was generally behind the ambitious schedule in the original action plan and that the schedule should be revisited. In the Figure below, the planned timeline for completion of all the actions has been updated as part of the Road Map prepared in accordance with ESAP Item 1, with all actions scheduled for completion in Q1, 2023. This information provides a more realistic timeframe and is aligned with the overall deadline in ESAP#1 requiring all of CBG's operations are brought to a level consistent with the intent of the IFC Performance Standards.



**Figure 7-2. Overall Progress and schedule for the Water Management Plan**

Key projects that were ongoing in the last quarter of 2021 were described in the previous IESC Monitoring Report and are revisited below with status updates.

- Improvements to the Oil Water Separator, Kamsar.
- Reduction of residual aluminium levels in drinking water at the Cogon water treatment plant (WTP).
- Upgrades to the N'Dousy wastewater treatment plant (Sangarédi) including UV plant installation, infrastructure, sludge management and water reuse.
- Discharge to sea of untreated wastewater at the Kamsar WWTP.
- Water quality of mine effluents.
- Impacts of mining activities on hydrogeology.

#### *Oil/Water Separator at Tank Farm (Kamsar)*

The IESC has previously reported in successive Monitoring Reports oil concentrations that exceed Guinean (50ppm) and IFC (10mg/l) oil in water limits in treated effluent discharged from the main oil/water separator system located at the tank farm in Kamsar. In particular, the October 2021 IESC Monitoring provided detail on CBG's three phase approach (described in detail within the IESC's October 2021 Monitoring Report) to achieving compliance which includes:

- Phase 1 – internal review of waste oil management practices and short-term technical solutions, for example, changing the band separators to improve oil recovery rates.
- Phase 2 - appoint an external consultancy to undertake a detailed audit by of the entire system, from the waste oil generating practices through to process engineering, with recommendations for technical improvements.
- Phase 3 – design and implementation of technical improvements.

This broad approach was agreed with Lenders with an additional requirement to procure an interim quick fix whilst detail design solutions are prepared.

The March 2022 in-country site visit provided an opportunity to visit the treatment facility (Appendix 2, Photo 31) and discuss ongoing and future plans to bring discharges into compliance with the Project Standard. Oil in water concentrations remained above the Project Standard, however there had been a notable improvement resulting from intervention works carried out since the previous (virtual) site visit<sup>15</sup>, including, in addition to works already carried out:

- Repair of an inadequate pump in the locomotive workshop, to enable oil to go to a mobile tank rather than OWS (performance issues are ongoing and further refinements are underway to further improve performance);
- Repair of floater in a sump at the locomotives workshop (wash down area) to enable automatic operation of pump;
- Cleaning of the separator tank to remove high volumes of accumulated sludge (*post site visit note: completed in June 2022*);
- Repair of the band skimmer.

Further actions required to achieve compliance with Project Standards were discussed with Lenders during the site visit and formally agreed shortly thereafter. The agreement consists of: i) short term interim actions to bring the effluent discharge into compliance with applicable standards, and a longer-term plan to develop a permanent solution. For the former, CBG intends to procure an 'off the shelf' containerised oil water separator to supplement the current treatment plant. For the latter, external specialist consultants will be appointed to conduct a performance audit of the current treatment facility and report on next steps, including engineering design and procurement of equipment, to achieve compliance. *Post meeting note: At the time of drafting this report the IESC can confirm that an external specialist has been appointed and CBG has met with suppliers of 'off the shelf' oil water separators to provide the interim solution.*

Whereas material progress has been made in identifying and initiating a solution, the oil concentrations in treated effluent remain above Project Standards at the time of the site visit.

#### *Cogon Water Treatment Plant (Sangarédi)*

No significant progress since October 2021 IESC Monitoring Report. The IESC has been informed that the plant supplier has been contacted to confirm the facility is operating/being operated correctly.

#### *Wastewater Treatment at Sangarédi (Dounsey)*

Two key actions have been identified for the Sangarédi (Dounsey) wastewater treatment plant (WWTP): i) commissioning of a UV treatment plant considered necessary to achieve standards for faecal coliforms in the treated effluent discharge; and ii) removal of sludge from the WWTP's primary wastewater receiving tanks. For the latter the action remains outstanding, however the UV treatment plant had been commissioned at the time of the site visit.

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<sup>15</sup> Post visit note: concentrations of oil n water were consistently below 100mg/l in March/early April 2022.

Throughout 2021, treated effluent from the Dounsy WWTP had consistently high levels of coliform bacteria. The commissioning of the UV treatment plant should have reduced coliform levels to comply with the Project Standard, however initial results at the time of the site visit were disappointingly high. CBG is therefore investigating the reason for poor performance of the plant and looking for opportunities to optimise operation of the UV treatment process.

#### *Recalibration of the Hydro/Groundwater Balance Model*

No significant progress since October 2021 IESC Monitoring Report.

#### *Mine Effluents*

The IESC has previously reported on high turbidity levels in a stream water originating from springs close to the Parawi stockpile which is used for bathing and washing purposes by the village of Fassaly Foutabhé (approximately 1km downstream from the springs). The cause of the turbidity is to date unclear and attempts to reduce the turbidity levels through construction of retention ponds (Appendix 2, Photo 12) for sediment settling purposes have proved unsuccessful. Investigations into the cause of the turbidity suggest fractures in the rock, potentially due to CBG's blasting, is the cause of the turbidity in the head waters at Fassaly Foutabhé. Further efforts are required to understand the cause of the high turbidity levels (more recently believed to be a ferric hydroxide gel) and also to remedy the situation. To this end, CBG is evaluating installation of filtering dykes at the head of the affected stream (Fassalywol stream). The efficacy of the remedial actions will be revisited by the IESC in subsequent site visits, noting all efforts are required to ensure communities access to adequate clean water supplies is not affected. In the interim, the IESC understands community members are able to access clean water from a new well installed by CBG in 2021 in Fassaly Foutabhé (see Appendix 2, Photo 11).

#### *Bypass of the Kamsar WWTP*

The IESC reported in the October 2021 Monitoring Report that discharge of untreated sanitary wastewater via an emergency overflow at the Kamsar WWTP was the result of rainwater ingress via damaged parts of the sewage collection network. In order to prevent further rain induced overflow events, a programme of inspection and repair was initiated for the sewage collection network feeding the Kamsar WWTP (see October 2021 IESC Monitoring Report for further detail).

At the time of the March 2022 site visit, the programme was reportedly ongoing and a flow meter, to record overflow events, had been ordered.

### 7.4.2 Water Quality Monitoring

Throughout 2021 water monitoring had been limited to few parameters until agreement with an external laboratory to analyse samples in October 2021.

#### *Surface water – Kamsar*

CBG's monitoring programme for Kamsar includes sampling of surface waters from 10 locations, 7 on the Nuñez river and 3 the Dougoufisa river. Elevated concentrations of oil have been detected on the Dougoufisa and the commercial port the latter likely to be influenced by discharge from the oil water treatment facility at the tank farm. Elevated COD levels and suspended sediments were also recorded in 2021.

The causes of these elevated levels should be investigated and, where found to be a result of CBG's activities, actions taken to identify source of contaminants/ improve quality of discharge.

During the site visit, the IESC observed surface water discharge channels (fed by dewatering of the primary crusher pit) that were heavily laden with fine sediments (Appendix 2, Photo 23 and 24) discharging to the River Dougoufisa with no apparent sediment trap in place. The quantity of suspended sediments exiting the Kamsar plant via this route should be further

investigated by the CBG environmental monitoring team and measures put in place to reduce discharge of suspended sediments.

#### *Groundwater - Kamsar*

Groundwater samples taken in 2021 from 5 locations within CBG Kamsar facility showed consistent exceedances of oil and grease, suggesting historical contamination at the site.

#### *Surface water – Sangaredi*

Samples taken in late 2021 did not reveal evidence of significant contamination in surface waters around Sangaredi mining areas.

#### *Groundwater - Sangaredi*

Consistently high levels of iron were observed during limited sampling conducted in 2021. CBG believes the high iron levels may be due to the oxidation of ferrous ions and subsequent formation of ferric hydroxide gels in samples collected. Furthermore, formation of ferric oxide gels may be exacerbated because the sampling method does not allow the purging of piezometers, potentially leading to unrepresentative groundwater samples. This theory requires further investigation, and pending further investigation, consideration of an amended sampling methodology should samples prove to be misrepresentative. The IESC will also need to give CBG's theory further consideration and cannot at this stage provide an opinion on its validity.

#### *Community boreholes*

In connection with the CAO mediation process two sampling campaigns were conducted in 2021 with samples being sent to external laboratories for analysis for a range of parameters. Samples were analysed by laboratories appointed by the Guinea Ministry of the Environment in late August early September 2021. Analysis of samples has resulted in two key findings:

1. elevated levels of iron, occasional elevated values of manganese, aluminum, turbidity and suspended solids, as well as some low pH values. CBG believe the elevated suspended solids and turbidity and the low pH are all related to iron oxidation (as described above).
2. Faecal coliforms were found in some community boreholes. CBG believes the contamination is most likely due to surface water infiltration in the absence of a potential contamination source for the aquifer. The IESC is unable to perform its own detail investigation however believes CBG's theory to be credible and that coliform contamination is unlikely to be related to CBG's activities. Nevertheless, the IESC understands CBG has partnered with the Guinea National Service of Water Supply (Service National d'Amménagement des Points d'Eau – SNAPE) for the rehabilitation and upgrade of existing community boreholes.

#### *New Hamdallaye Village*

In previous site visit reports the IESC has reported on the quality of water sampled from newly-drilled drinking water wells in the relocated Hamdallaye village. In particular, one sample indicated the presence of faecal coliforms. Subsequent monitoring by has shown zero coliforms suggesting this was an anomalous result. Review of data provided in the 2021 Annual Monitoring report did not indicate presence of faecal coliforms in samples taken from Hamdallaye.



## 7.5 Noise and Vibration

### 7.5.1 N&V Action Plan

The graphic shows the planned timeline for completion of all the actions as per the overarching schedule defined in the Road Map (ESAP Item 1) with all actions to be completed by Q2, 2023.

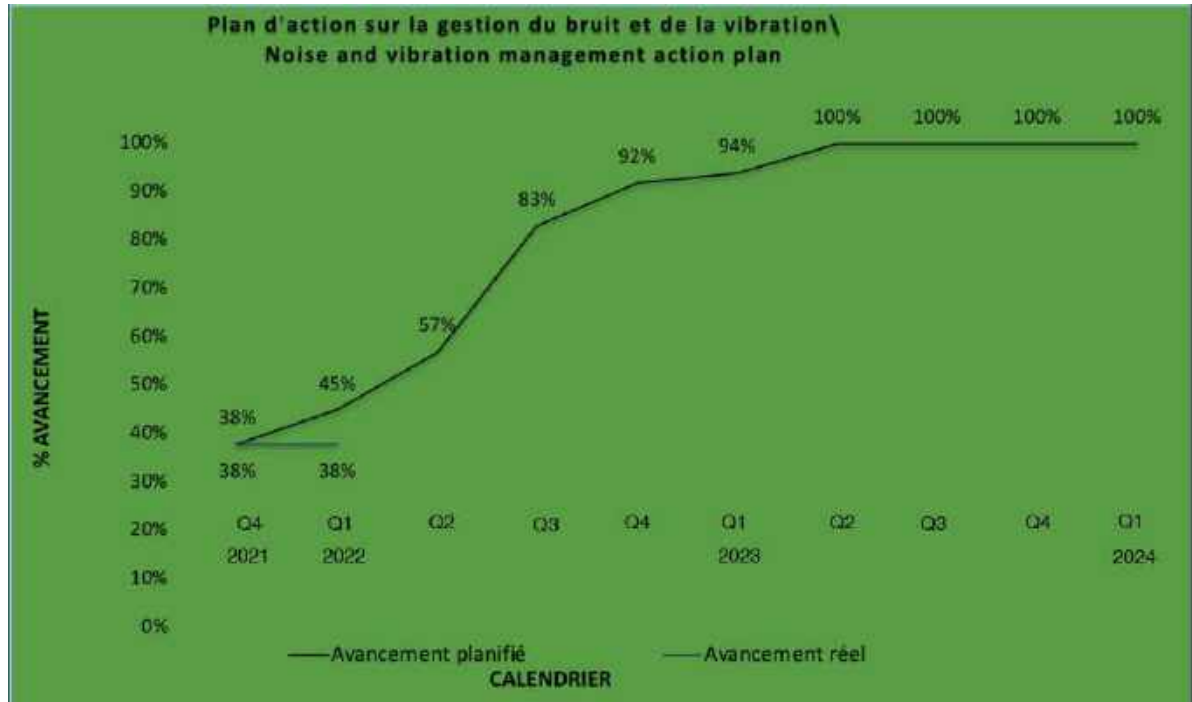


Figure 7-3. Status of implementation of N&V Action Plan (cumulative).

### 7.5.2 Noise Monitoring Railway

One of the key actions specified in the N&V Management Plan relates to the mapping of sensitive receptors affected by the MUOA rail project, specifically those receptors identified within 50m of the railway that, based on predictive modelling, will potentially be impacted by noise and vibration from increased train movements in the future. This activity was reported to be delayed in October 2021 but remains a key action for 2022.

In the previous IESC Monitoring Report, it was highlighted that broken and malfunctioning equipment/software was hampering the collection of noise measurements, new equipment has since arrived (4 new noise meters) but essential ancillary parts (including tripods and battery packs needed for prolonged measurements) had not arrived in country. At the time of the March 2022 site visit CBG was in possession of all equipment necessary to relaunch the full noise monitoring programme.

In 2021 two monitoring campaigns were undertaken using a single working noise meter. Findings from the first 2021 campaign were summarised in the previous October 2021 IESC report. The second campaign in late October 2022 included only one 48h monitoring event along the railway line at Kastrie, categorised as a semi-rural location situated 11 km from Kamsar and set back 19m from the railway line. Noise measurements at this location were 69.3 dB(A) and 67.5 dB(A) for day-time and night-time measurements respectively. As reported for the first 2021 monitoring campaign, the levels appear to be high<sup>16</sup>, especially when compared with the IFC EHS Noise Level Guidelines of 45dB(A) for night-time noise.

<sup>16</sup> A L<sub>Amax</sub> of 97.2 dB(A) was recorded.

As per a previous recommendation, CBG should verify the accuracy of noise readings using the new calibrated equipment<sup>17</sup> and also attribute noise measurements to the passage of individual trains. In particular, noise attributable to the passage of a train should be distinguished from background noise levels. Measured noise levels should also be compared against background levels and any incremental increase assessed against the <3dB, as per IFC Noise Level Guidelines.

At the time of the site visit, CBG informed that a full noise monitoring programme had restarted (scheduled for March-April 2022). Vibration measurements were not taken for the railway line in 2021 because a single seismometer available to the CBG environmental monitoring team was dedicated to monitoring blasting at the mine. As indicated in Section 7.2.1, a new seismometer has been ordered but had not arrived on site at the time of the site visit.

### 7.5.3 Noise Monitoring Mine Site Blasting

CBG continues to monitor noise from active mining areas, including noise generated during both blasting events and general mining activities. Noise monitoring data collected in 2021, and reported in the 2021 Annual Monitoring Report, was limited to two sampling campaigns, with a range of measured results that are above and below IFC Noise Level Guidelines. As with the rail monitoring results, background levels and an incremental increase relative to the background is not reported, thus it is not clear whether the relatively high noise levels are a consequence of CBG's activities or background levels that are independent of CBG. The IESC therefore recommends CBG undertakes greater interpretation of results, particularly where there apparently exceed IFC guideline levels to determine whether noise levels are attributable to CBG activities and therefore require mitigation. Factors influencing noise levels, including both CBG noise and other noise sources should be described and used to define any corrective actions where necessary.

CBG is continuing to temporarily operate a 1000m buffer zone between blast location and residential areas in line with the Blasting Protocol (see Section 8.2). Any return to CBG's standard practice to apply a 500m buffer zone will be informed by the findings of an independent noise specialist commissioned by the CAO to assess the impacts of CBG's operations on affected communities.

### 7.5.4 Use of surface miners

Two surface miners were operating at the time of the IESC site visit and a third has been recently procured although had not been delivered. The intention is to use surface mining techniques within the blasting buffer zone on the basis that they will be quieter (although more continuous in nature). With this intention in mind, CBG is planning to undertake noise monitoring at three distances: 300; 400 and 500m (in line with an earlier IESC recommendation) to determine the proximity to communities a surface miner can operate without exceeding guideline limits. The Environmental Monitoring Programme, schedule for a revision in 2022, should be amended to reflect this additional noise monitoring.

### 7.5.5 Ground Vibration Monitoring for Blasting

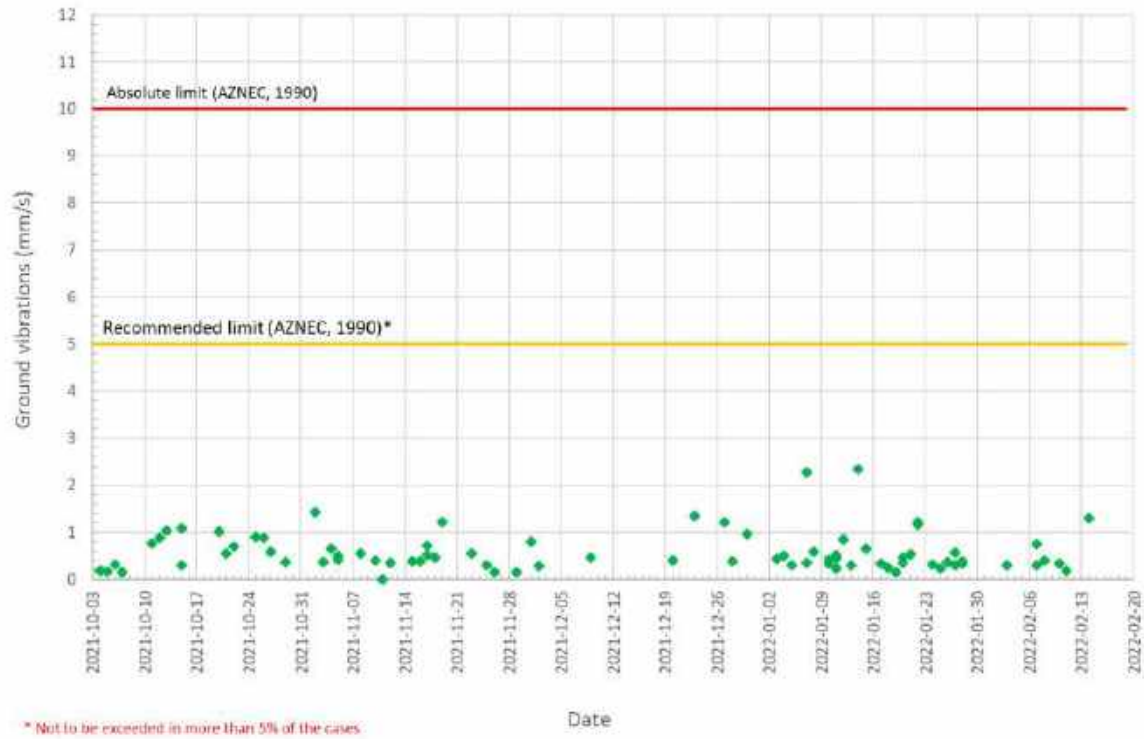
CBG routinely monitors ground vibrations at community locations in proximity of blasting events (Photo 8, Appendix 2). Ground vibration is assessed against commonly recognised guidelines set by the Australian and New Zealand Environmental Council.<sup>18</sup> Figure 7-4 below shows measured

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<sup>17</sup> CBG should run multiple noise meters in parallel to check whether results are the same or a meter requires calibration.

<sup>18</sup> AZNEC, 1990. Technical Basis for Guidelines to Minimize Annoyance Due to Blasting Overpressure and Ground Vibration.

ground vibrations since October 2021 to be significantly below the recommended and absolute limits specified in the N&V Management Plan.

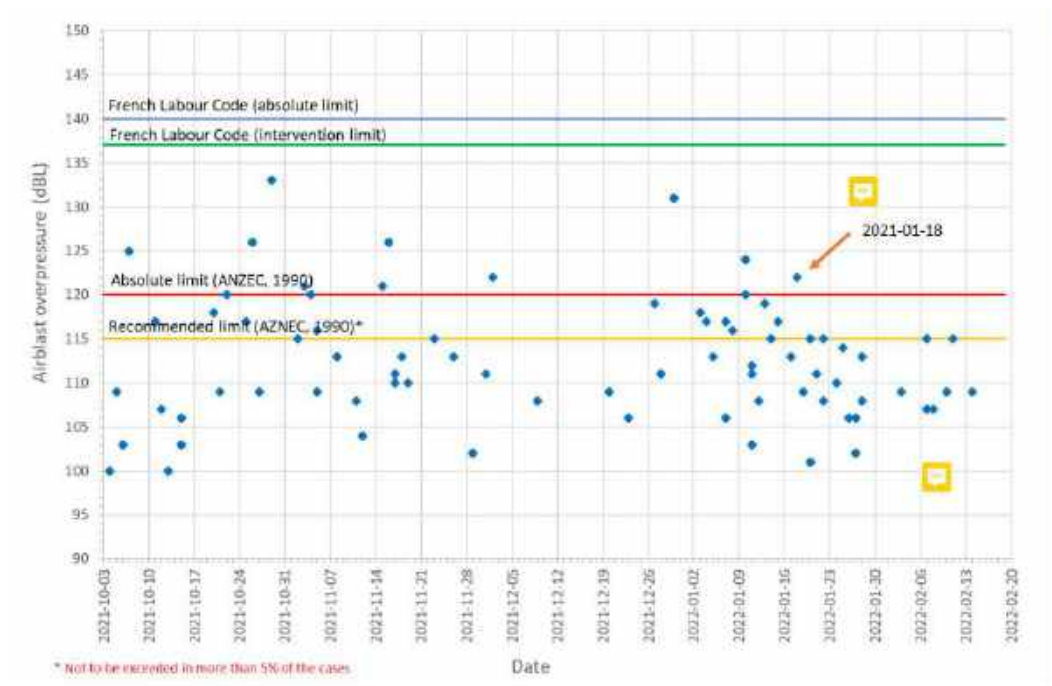


**Figure 7-4. Ground vibration measured in villages during blasting events**

7.5.6 Airblast overpressure

The IESC has previously reported exceedances in blasting overpressure and measures to reduce overpressure, including a modification to the blasting procedure to reduce vibration and a new approach to stemming<sup>19</sup> has been adopted which should reduce airblast overpressure as well as noise and dust. Figure 7-5 below shows the applicable project standards (AZNEC limits) were exceeded on several occasions in 2021. The reason for an apparent improvement since 18<sup>th</sup> January 2022 is encouraging however it is unclear whether this is due to a change in practice, for example, reduce charge. The IESC therefore recommends further interpretation of air blast overpressure results in order to understand the relationship between blast charge, stemming practices, meteorological conditions and proximity communities to better understand the factors leading to exceedances/opportunities to avoid future exceedances.

<sup>19</sup> Stemming refers to the packing of material in the charge hole. Poor stemming results in blow outs/loss of energy. And increased noise/dust levels.



**Figure 7-5. Overblast pressure measured in villages during blasting events**

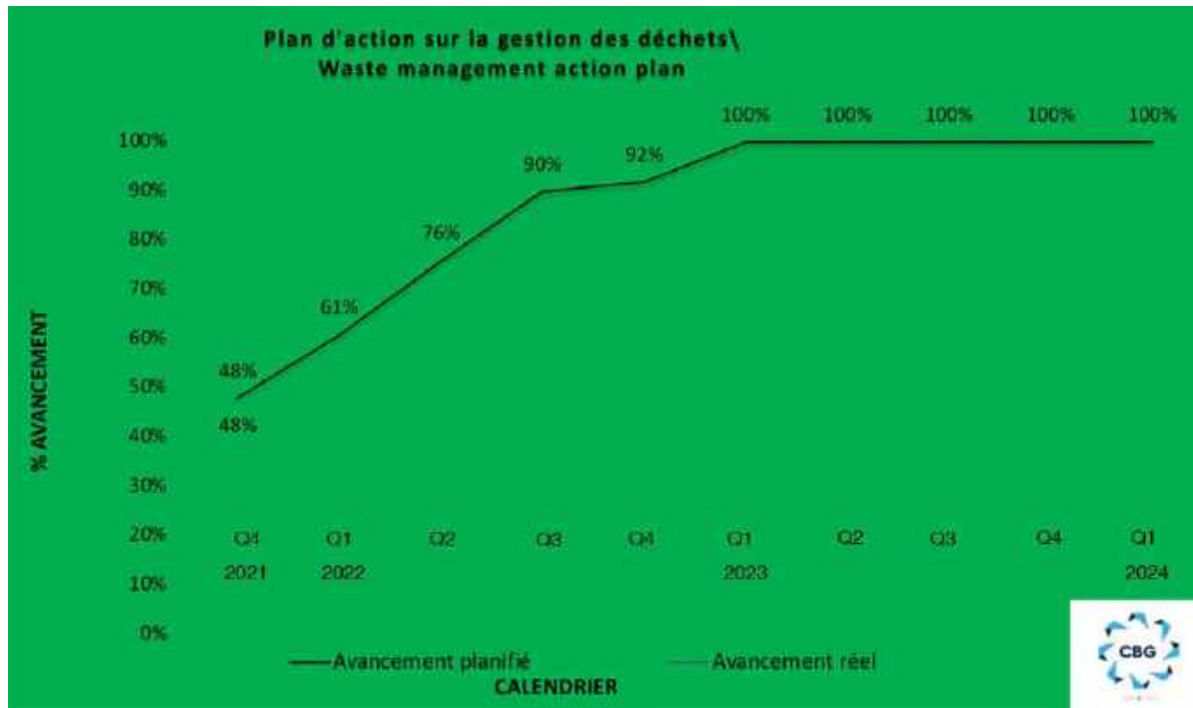
**7.5.7 Other priority actions for 2022**

Consistent with the NVMP, CBG is planning to undertake a study to determine options for reducing noise impacts along the railway. The study is prompted by a concern that typical noise mitigation measures, for example acoustic barriers, will be rejected by affected communities.

**7.6 Waste Management**

CBG has two primary operational waste management facilities located in Sangaredi and Kamsar (the latter referred to as Tora bora). Both are being upgraded in line with the measures specified in the current Waste Action Plan (that sits within the Waste Management Plan (WMP)). Both waste facilities will accept hazardous and non-hazardous waste following the same design which broadly includes lined reception slabs, landfill cells, incinerators, bioremediation slabs and a leachate treatment system.

At the end of 2021 overall progress with the implementation of the Action Plan was at 48%. The current schedule foresees completion of all actions by Q1 2023, well ahead of the ultimate deadline of January 2024 set by ESAP Item 1. In 2022 CBG intends to revise the current Waste Management Plan to reflect current practice and near-term plans. CBG also intends to develop a longer-term waste management strategy, recognising the finite (approximately 5 year) design life span of the Sangaredi and Tora Bora facilities.



**Figure 7-6. Revised Schedule for Completion of Waste Action Plan.**

Given the nature of the in-field site visit the IESC was able to physical inspect both facilities. Findings for both are provided in the sections below.

7.6.1 Kamsar

*Tora Bora*

Preparatory works at the Tora Bora waste management facility (WMF) remain ongoing although limited progress has been made since the previous VSV in October 2021 with the status as follows:

- Both incinerators remain fully operational at the time of the VSV.
- Bioremediation slab is available and will be used for treated of oil contaminated soils later in 2022.
- The design of waste cell, although reportedly near complete in October 2021, is ongoing. Of note, certain assumptions regarding the capacity of the engineered landfill cells are being revisited, design remains to be finalised and construction had not started in early 2022 as had been anticipated at the time of the previous IESC Monitoring Report
- Office facilities at Tora Bora, although in place, had not been commissioned and was found to be locked and inaccessible to workers at Tora Bora (Appendix 2, Photo 17).

Wastes destined for the Tora Bora facility that cannot be treated in the incinerators continue to be stockpiled. Whilst this can be done safely, the IESC the delays in finalising construction of Tora Bora, whilst far from ideal, do not pose a significant risk.

Delays in commissioning the office result in a number of inefficiencies and concerns such as CBG’s ability to record waste types/volumes and keep safety documentation. There are also health and safety concerns associated with the uncommissioned office, such as lack of a refuge (Appendix 2, Photo 18 shows an area used by workers to shelter from the sun adjacent to the incinerator fuel

storage area). An office space would also provide safe location for storage of first aid first kit and other equipment (see also Section 6.2.3, Risk Management and Control of Work)

The IESC understands the office had been in place for several months and is awaiting water and electricity connections to be made by the Maintenance Department. CBG did not provide an explanation for the delay other than speculation that these works were not a priority. The IESC is of the opinion that decent office space and shelter from the weather are basic requirements for workers' welfare and as such connection workers' access to the office space at Tora Bora should be made a priority.

#### *Bendougou*

As reported previously, CBG is considering a restart of its use of the Bendougou waste facility in Kamsar but an agreement reached in 2021 with authorities was revoked following the military coup in September 2021 and a change in the authorities responsible for approving CBG's use of Bendougou. Discussions with the new authorities concerning future use of Bendougou are yet to restart and consideration of Bendougou is therefore currently suspended. Slow progress with respect to Bendougou does not represent is not a concern because CBG does not require additional capacity at this time. Further IESC commentary on the use of Bendougou will restart once CBG's plans evolve.

#### 7.6.2 Sangarédi

The IESC reported in October 2021 that Sangarédi waste management facility has been secured following the erection of a fence and other preparatory works had also been ongoing, however design remained to be finalised and actions requiring completion of the site, such as procurement of incinerators (planned for 2021), remained outstanding. Final design of the facility was anticipated to commence in early 2022 with actual construction of the site scheduled shortly thereafter. At the time of the March 2022 IESC site visit there appeared to have been little progress with the actions described above still scheduled for 2022.

Visual inspection of the Sangarédi waste facility showed evidence of waste burning with several areas of smouldering waste (Appendix 2, Photo 15). CBG should investigate the cause of these fires<sup>20</sup> and take steps to eliminate this in the future. Where possible the fires should be extinguished.

### **7.7 Hazardous Materials**

Limited progress with the closure of actions specified in the Hazardous Materials Management Plan (HMMP) has been made since the IESC last Monitoring Report from October 2021, with overall progress against the HMMP Action Plan remaining behind the original schedule as reported previously. A revised schedule, included as part of the afore mentioned Road Map, now shows completion of all actions by end of Q4 2022. Priority actions described in the IESC's October 2021 Monitoring Report and bullet pointed below for convenience are reportedly 'in progress':

- Completion of Hazardous Materials Manual (consolidation of existing procedural requirement under a single umbrella document),
- Development of a Hazardous materials database (working with the legal department),
- Training programme,
- Additional controls for procurement of chemicals under HSECQ oversight,
- Enhanced audit process for hazardous materials management.

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<sup>20</sup> It was suggested that waste brought to the Sangarédi site might already contain embers from coking activities although this cannot be verified.

Similarly, the previously reported plan for decommissioning of lightning rods (containing small amounts of radioactive material) is a 2022 priority action.

The IESC will revisit progress against each of these actions during a second site visit planned for Q4 2022. In the interim, findings from the October 2021 report remain unchanged.

## **7.8 Resource Use and Energy Efficiency**

### **7.8.1 Status Update**

The Resource Use and Energy Efficiency Management Plan (RUEEMP) is primarily focused on: i) reducing water use; ii) reducing energy consumption; and iii) reducing GHG emissions.

Progress in the implementation of the RUEEMP Action Plan was reported in the IESC's October 2021 Monitoring Report. As of March 2022, little further progress had been made due to other priorities, with most actions scheduled for 2022.

### **7.8.2 Status of Priority Actions for 2022**

#### *Revised Standard Operating Procedure (SOP) for GHG Emissions Monitoring and Reporting.*

Details on this revised SOP were provided in the IESC previous Monitoring Report. A key recommendation in that report was for GHG emissions to be presented in a manner that accounts for the increasing production rates, for example, total emissions for the dryers could be expressed in tonnes of CO<sub>2</sub>/unit of bauxite produced. Thereby recognising an improvement in emissions per unit of bauxite produced even if total emissions are increasing due to the increasing annual throughput of bauxite. Consistent with the 2022 timeframe a revised procedure for measuring and recording GHG is due in June 2022. Contributions from the different CBG sources will be inventorized.

#### *Mapping of Energy Efficiency Opportunities/Alternative Energy Sources*

CBG envisages the support of an external consultant in 2022 to identify energy efficiency opportunities/alternative sources, although no firm plans were in place at the time of the October 2021 virtual site visit. As of March 2022, no further progress had been made on this action.

#### *Mapping of Opportunities for Water Use Optimisation.*

The Maintenance Department has then been tasked to record water (and electricity) usage in a database. Since the previous site visit new water meters have been procured and installed.

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

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2022_013	Environmental Monitoring Programme	<p>Progress has been made with respect to finalisation of contractual agreements with all laboratory services providers and dispatch of samples for analysis. Additional monitoring equipment has also been received. However, CBG has been unable to implement its Environmental Monitoring Programme in full for a number of reasons</p> <ul style="list-style-type: none"> <li>• Fixed AQ monitoring stations require repair.</li> <li>• Discontinued equipment/consumables</li> <li>• Lost equipment</li> </ul>	<p>Further effort is required to ensure full implementation of the EMoP and monitoring components of the environmental management plans, including:</p> <ul style="list-style-type: none"> <li>- Repair of fixed AQ monitoring station.</li> <li>- Doubling up on specialist monitoring equipment.</li> </ul> <p>Other priorities to be addressed include:</p> <ul style="list-style-type: none"> <li>- Disclosure of monitoring results to affected communities in an appropriate and meaningful format.</li> <li>- Procurement of a data management system;</li> </ul> <p>The IESC also believes CBG should undertake a resourcing 'Needs Analysis' to determine current and future staffing and training needs, especially if progress falls behind the schedules detailed in the Road map exercise.</p>	<b>Moderate</b>
March 2022_014	Air Quality – finalisation of AQMP	<p>CBG was unable to complete wet season stack emission testing in 2021 as a result of COVID-19 and security travel restrictions. Consequently, it is unable to meet the timeframes specified in the ESAP Item 13 for finalisation of the AQMP.</p>	<p>CBG and Lenders need to formally agree the steps needed and a revised timeframe for the update of the AQMP, inclusive of agreement on dryer stack emission limits.</p> <p>CBG should use all reasonable efforts to expedite finalisation of the AQMP. The IESC therefore recommends</p> <ul style="list-style-type: none"> <li>• early appointment of an engineering design consultant under a preliminary scope of work (potentially the external audit identified within CBG's action plan).</li> <li>• responsibility for completion of the AQ CAP and the ESAP item 13 relating to revision of the AQMP sits with the Operations Director.</li> </ul>	<b>High</b>
March 2022_015	Air Quality – fugitive dust emissions	<p>An evaluation of dust suppressants has been ongoing for several months. Dust generating activities are an inherent issue for CBG's activities both at the mine and port locations.</p>	<p>CBG should expedite studies not the use of commercial dust suppressants and explore opportunities to use these and other techniques to further reduce fugitive dust emissions including:</p>	<b>Moderate</b>



ID	Aspect	Issue Description	IESC Recommendation	Significance
			<ul style="list-style-type: none"> <li>• efforts to minimise large accumulations of dust should be increased, and</li> <li>• application of dust suppressants at Kamsar evaluated following completion of the ongoing dust suppressant study</li> </ul>	
March 2022_016	Oil Water Separator, Kamsar	Whereas material progress has been made in identifying and initiating a solution, the oil concentrations in treated effluent remain above Project Standards at the time of the site visit.	Full implementation of the agreed oil/water separator corrective action plan	<b>High</b> (pending implementation of the corrective action)
March 2022_017	Sangaredi WWTP	<p>The new UV treatment plant at the Dounsey WWTP has been commissioned, however coliforms are still being detected.</p> <p>The sludge tanks have not been emptied although a contractor has been identified. This is a long overdue action.</p>	<p>Performance of the UV treatment plant should be investigated and optimised (as is the current CBG intention).</p> <p>Emptying of the sludge tank should be prioritised and any performance improvement at the WWTP recorded.</p>	<b>Moderate</b>
March 2022_018	Surface water discharge - Kamsar	<p>Elevated COD levels and suspended sediments were recorded in surface river water surrounding the Kamsar processing facility.</p> <p>Surface water discharge channels (fed by dewatering of the primary crusher pit), that were heavily laden with fine sediments, were observed discharging to the River Dougoufisa with no apparent sediment trap in place.</p>	The causes of elevated levels of contaminants should be investigated and were found to be a result of CBG's activities, actions to identify source of contaminants/improve quality of discharge should be identified.	<b>Moderate</b>
March 2022_019	N&V impacts	Noise levels taken from various rail and mine locations are generally high, however it is not clear whether the noise is generated by CBG activities or other background sources unrelated to CBG's activities.	Further interpretation of N&V monitoring results is required, particularly where there are apparent exceedances of Project Standards to determine whether noise levels are attributable to CBG activities and therefore require mitigation. Measured results should also be compared with background levels and the 3 dB increase above background limit taken into consideration when assessing compliance with applicable standards.	<b>Moderate</b>

ID	Aspect	Issue Description	IESC Recommendation	Significance
			Factors influencing noise levels, including both CBG noise and other noise sources should be described and used to define any corrective actions where necessary.	
March 2022_020	N&V impacts	The Project Standard for airblast overpressure was regularly exceeded prior to January 2022.	Further interpretation of airblast overpressure results needed in order to understand the relationship between blast charge, stemming practices, meteorological conditions and proximity communities to better understand the factors leading to exceedances/opportunities to avoid future exceedances.	<b>Moderate</b>
March 2022_021	Waste management	<p>Progress with the design and construction of the two waste management facilities remains slow.</p> <p><u>Tora Bora</u> - During the site visit, workers facilities were found to poor at Tora Bora; a containerised office facility that would also provide shelter/eating area had not been commissioned.</p> <p><u>Sangaredi</u> – waste was found to be burning.</p> <p>Previous finding from the October 2021 IESC Monitoring Report remain valid – see Appendix 3.</p>	<p>The root cause of the slow progress, for example, lack resources/reliance of procurement and maintenance departments in CBG, should be identified.</p> <p>The commissioning of the office at Tora Bora should be prioritised. CBG’s Senior Management should step in if the HSECQ Department is being deprioritised.</p> <p>The cause of fires at Sangaredi waste facility should be investigated and take steps to eliminate further fires in the future. Where possible the fires should be extinguished.</p>	<b>Moderate</b>

Certain findings from early IESC monitoring visits are yet to be closed. These ‘open’ legacy findings are provided in Appendix 3 of this report.

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

### 8.1 Introduction

CBG has developed a Community Health and Safety Management Plan (CHSMP), which corresponds with ESAP Item 12. More specifically, this includes:

- updating the CHSMP and corresponding action plan to integrate the impacts of the MUOA Project; and
- action plan review, based on lessons learned since its implementation and review of deadlines.

The CHSMP is currently being validated at the level of the Policy Lenders. The new KPIs presented in the CHSMP will be implemented, starting in 2022.

Out of 19 actions that were planned for 2021, 2 have been completed (the Blasting Protocol and CHSMP Action Plan with KPIs report) and 17 are ongoing.

The areas of focus during the March 2022 site visit have been the Blasting Protocol implementation and community health and safety relating to the railway line.

### 8.2 Blasting Protocol

The Blasting Protocol was approved in August 2021 and issued as Procedure III\_HSEC\_57 (Rev01) '*Procédure Environnementale et Sociale pour le Minage*'.

The following mitigation measures had been introduced toward the end of February 2021 to reduce blast impacts including:

- Reducing charges by increasing the tamping height of blast holes, reducing the number of holes in a blast range, and readjusting blast patterns according to location;
- Reducing blasting frequency: from an average of 5 blasts per week per area to 2 blasts maximum per week per area; and
- Before February 2021, blasts generally occurred up to 13:00 hours. Now, to the extent feasible and depending on weather observations, blasts occur before 11:00 when meteorological conditions are more favourable for reducing the dispersion of dust.

As part of the Blasting Agreement<sup>21</sup>, the following additional actions have taken place:

- Section 3.2: "*The Company will cease any blasting activities within 1,000 meters of a village no later than October 1st, 2021, unless a different buffer zone is recommended by the [independent] Expert.*" In relation to this commitment, as of October 1<sup>st</sup> 2021, CBG ceased all blasting activities within a 1,000 meter radius of a village. Since the 1<sup>st</sup> October CBG has reportedly not received any complaints or concerns from the communities regarding the proximity of blast events.
- Article 3.3: "*The company will not use surface miners and will not conduct any other mining activities within a 500 meter of a village, unless a different buffer zone is recommended by the Expert.*" CBG has purchased two surface miners with the intention of avoiding blasting in locations near to communities. One of these surface miners was operating in the Sangarèdi mining areas at the time of the site visit. The second miner is expected to arrive in Q1 2022 and to be operational soon afterwards. Currently, as per the agreement, use of surface miners has been outside the 500m buffer zone and surface miner activity can take place inside the 500-meter buffer zone only if concluded to be acceptable by the independent

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<sup>21</sup> The Blasting Agreement is an agreement formulated as part of the ongoing CAO mediation process between CBG and affected communities.

expert appointed through the CAO mediation process. CBG has not received any complaints or concerns from the communities specifically about the use of surface miners.

- Article 3.4: *"Both buffer zones will be physically demarcated to ensure all Parties are aware of the limits of the buffer zone."* Information meetings were held in the villages of Parawi, Fassaly Foutahbè, Paragogo and Mbourorè on November 16, 2021, prior to the demarcation of the buffer zones. CBG informed the communities of the enforcement of this decision agreed upon at the CAO mediation. Community members requested they could have several representatives during the demarcation of the buffer zones, namely the sector chiefs, the community assistants who are involved in monitoring the blasting, some elders, youth representatives and other community representatives. However, the number of people able to verify demarcation was limited at CBG's request for security reasons.
- Marking of the 500-meter buffer zones was carried out by CBG in four villages in the presence of sector leaders and/or other community members as follows:
  - Parawi on November 17, 2021 and December 2, 2021
  - Fassaly Foutahbè on November 18 and 19, 2021
  - Paragogo on November 25, 2021
  - Mbourorè on November 29, 2021
- Section 3.5: *"The Company will provide all villages that could be affected by blasting a three-day notice before any blasting occurs and a reminder on the day of blasting."* CBG had begun implementing this practice prior to the signing of the agreement and continues to inform communities that may be affected by blasting within three days. An information sheet to this effect was completed and signed by CBG and the community assistants at the end of September 2021, and a reminder was sent out on the day of the activity.
- Section 3.7: *"The Company will put in place or continue other mitigation measures, including drone monitoring, vibration and acoustic spike monitoring, and blast load reduction. A report on the mitigation measures and their effectiveness at avoiding negative impacts on communities will be presented to the communities on a quarterly basis for their feedback, which will be taken into account in adapting mitigation measures as necessary to avoid impacts."* The first report was being finalised at the time of the March 2022 site visit and is expected to be available before the 9th CAO mediation session.
- Article 3.9: *"The use of surface miners will be in accordance with the international standards to which CBG has subscribed, including International Finance Corporation ("IFC")' Performance Standards."* CBG had invited the communities to witness the commissioning of the surface miners so that they could observe, for themselves, how the machines operate. During these meetings, the communities indicated that they were satisfied with the operation of the machines and the levels of noise and dust level generated (considered to be low). CBG continues to operate these machines outside of the 500-meter buffer zone. The IESC has been advised that the noise levels of surface miners have been assessed and are regarded as acceptable, although noise level measurements at locations within the limit of the 500-meter buffer zone have not been yet collected. Noise measurements have been planned in order to gather empirical data and confirm noise levels are acceptable (see also Section 7.5.3, Noise Monitoring at the Mine Site).

Despite these mitigation measures, a total of 5 complaints, registered between October 2021 and February 2022, relating to cracks in walls/collapse of walls are currently being processed by CBG in accordance with its Grievance Mechanism. Whilst the processing of each grievance is ongoing, CBG's initial investigations suggest the incidence of cracks/collapsed walls does not coincide with blasting events and therefore cannot be attributed to CBG's blasting activities. Of note, one complaint has been submitted to the CAO for further consideration. Further details with respect to community grievances are presented in Section 5.2.6.

### **8.3 Communicable Disease Prevention**

#### **8.3.1 Malaria**

CBG has decided to extend the scope of its malaria programme to include Daramagnaki in addition to Kamsar and Sangarédi. This decision resulted from CBG's analysis of health centre data, which showed high malaria prevalence rates in Daramagnaki and, also, the number of people who come from this area to receive treatment in Sangarédi. The distribution of nets, provided by both CBG and National Malaria Control Programme (NMCP), remains part of the programme. CBG will survey communities to obtain community concerns and baseline data to be used for monitoring and evaluation purposes. CBG is working in collaboration with the Chamber of Mines and National Program for the Fight Against Malaria to implement its programme. The ToR have been drafted and validated by the Chamber of Mines and the National Program for the Fight Against Malaria.

Regarding the internal and regular distribution of nets to employees by CBG, this had been completed by CBG by Q4 2021.

#### **8.3.2 HIV and AIDS**

With respect to Human Immunodeficiency Virus (HIV) and Acquired Immune Deficiency Syndrome (AIDS) awareness and prevention activities, no activities were undertaken in 2021 due to lack of budget. See October 2021 Monitoring Report for further details.

### **8.4 Community drinking water**

In 2021, CBG provided 10 boreholes (wells) in accordance with the action, under the CHSMP, "*...to identify health and safety community investment priorities...*". These are separate from the 10 boreholes provided under the MUOA Project, which were also installed in 2021. A total of 9 other boreholes have been provided as follows:

- 4 boreholes in Housiré, Sakillet, Tyindoye, and Madina Kompeta, RC Missira (Prefecture of Télimilé);
- 3 boreholes in Wendou Mbour centre et 1 forage à Doungourouna;
- 1 borehole in Kolaboui Centre, RC Kolaboui (Prefecture of Boké);
- 1 borehole at the school of Bouilly RC Tanènè.

Along with provision of the boreholes, the contractors appointed to install the boreholes provided:

- Analysis of water samples, for example, faecal coliforms;
- Training sessions for community members on the operation and maintenance of the boreholes;
- Required tools; and
- Direction/assistance in establishing Water Management Committees.

Commentary on the results of borehole water quality monitoring is provided in Section 7.4.2.

### **8.5 Rail and Community Health and Safety**

The IESC previously reported community fatalities involving mental health patients and CBG's plans to fence a care facility supporting the mental health patients. At the time of the March 2022 site visit, construction of a fence at the treatment centre was ongoing.

In January and February 2022, 1 fatality involving a child occurred, alongside 1 incident involving a person affected by mental illness and 1 accident which resulted in injuries (related to alcohol consumption). Such events have led to the reinforcement of security along the railroad (see Section 8.5.1 below).

During the March 2022 site visit, it was observed that the population growth of Kamsar is occurring along the railroad, leading to the increasing traffic flow (of pedestrians and vehicles) across railway crossings (both informal and authorised, level crossings). This poses numerous health and safety risks for communities.

Three topics are presented in this section as follows:

- The implementation of the MUOA Transitional Measures Plan;
- Community incidents; and
- The Rail Safety Management Plan.

#### 8.5.1 MUOA Transitional Measures Plan Implementation

The MUOA Transitional Measures Plan (TMP) contains a range of 'soft' and 'hard' community safety measures.

As reported in the IESC's October 2021 Monitoring Report, key soft measures include 30 flagmen (*hommes piquet*) at pedestrian crossings in Kamsar – such personnel are permanently in place – and 2 people allocated to each set of points (*aiguilles*) along the entire railway.

In February 2022, shortly before the IESC's site visit, there was a fatality involving a community member who was struck by a moving train (see Section 8.5.2 below). Following this fatality the following actions have been taken:

- the number of flagmen has been increased by 90 to achieve a total number of 192 positioned approximately every 150 meters along the railway in urbanised areas.
- the speed of trains reduced (from 40km/h to 20km/h) in densely populated areas (e.g. agglomerations such as Kolaboui and Kamsar).

The hard measures consist mainly of structures including fencing (betafence) and pedestrian bridges (to be referred to, hereafter, as footbridges or *passerelles*) and level crossings (see Section 3.2, Status of MUOA Project). All of the requisite community and local government consultations related to the following topics are now complete:

- Sites for the *passerelles*; and
- Ongoing works to install the *passerelles*.

However, consultation continues to be undertaken, as necessary, to discuss specific issue such as hiring of local people for construction/installation works.

Negotiation details with the betafence new provider are ongoing. There is uncertainty regarding the schedule for the installation of the betafence, though it is expected to be finalised by the end of 2022. Communities will need to be informed about betafence installation approximately 2 to 3 weeks prior to its installation.

During the March 2022 site visit, it was observed that erection of the betafence and construction of footbridges need to be finished as a matter of priority, particularly given the delays experienced to date. The transitional measures, especially the short-term measure requiring the presence of the *hommes piquet* along the railroad in Kamsar, have proven to be insufficient in the mid-term. Regarding *hommes piquet* along the railroad in Kamsar, the IESC further notes that:

- shifts (understood to be 12-hours in duration) are long, particularly given local climatic conditions (i.e. high temperatures);
- with the exception of 1 flagmen at a level crossing, no flagmen were observed on post at midday on one of the days of the March 2022 site visit, which was reportedly due to religious commitments (i.e. Friday prayers) and warm weather conditions.

Furthermore, although the number and position of level crossings and footbridges have been determined in consultation with the affected communities, it does not eliminate the possibility that, when such features are finally installed, the affected communities subsequently determine that they might not be as sufficient as expected and/or are not located in the most strategic places. In this event, CBG may receive requests for additional footbridges.

In this regard, the IESC notes that CBG will have faced certain constraints when siting the footbridges and that the number of footbridges cannot be unlimited. For example, the preparatory works for the footbridge at Kolaboui are located at the edge of the town and will inevitably cause some inconvenience for users (Appendix 2, Photo 7). Use of footbridges and acceptance by communities will require close monitoring as the betafencing is erected.

The IESC has previously reported that stepped footbridges (Appendix 2, Photo 4) do not enable access by disabled people who are unable to walk/climb steps. CBG is aware of this issue and indicated that disabled people will need to proceed to a level crossing to cross the railway. The IESC recommends further consideration is given to the needs of disabled (and able bodied) people using level crossings, including for example, safety measures such as clear separation of vehicles from pedestrians.

#### *Hommes Piquets*

As indicated above, CBG has temporarily positioned a significant number of "hommes piquet" (also referenced to as "picket men" or "flagmen elsewhere in this report) along the railway line in the town of Kamsar and at each level crossings. It is important to acknowledge that the construction of pedestrian footbridges is in progress and that a project to install fencing is also planned that will largely negate the need for hommes piquet once erected.

Notwithstanding the above, during interviews with the hommes piquet, it was revealed that:

- The hommes piquet don't have a train schedule; rather, they are informed by radio and horn when a train is approaching.
- The radio is used to inform the hommes piquet when the train is approaching, but there is no confirmation procedure to check that everyone has received the message (an OHS risk if the radio is switched off, if the volume is too low or if the battery is flat at the time of the approaching train).
- The hommes piquet don't know the emergency procedure in the case of an incident on the railway. They didn't advise the IESC that they have the authority to stop the train in case of a major incident on the railway.
- The hommes piquet don't have the authority to forbid persons from crossing the railway, despite stating that the rule is no crossing.
- HSE documents are not available on site with the hommes piquet.
- The hommes piquet are unaware of their own risks related to their workstations (they hadn't done a Take5 assessment).
- There is a lack of kilometer postings along the railway, which raises concerns about how easily and accurately a given location can be communicated in the event of an emergency.

**Recommendation** – The hommes piquet need to be better trained and supervised. They should be aware of emergency procedures, as per the Road and Rail Safety Management Plan, and their roles and responsibilities.

**Recommendation** – CBG should use an official and more-structured control system for rail activities. CBG need to confirm that all personnel present along the railway are aware before the passage of trains. Kilometre posts need to be installed, as well as railway safety signs for the

communities, and a way to communicate the train schedule to the hommes piquet needs to be identified and implemented.

#### 8.5.2 Community Incidents

The establishment of the betafence has become a priority, as this might help to reduce the likelihood of fatalities and incidents involving the use of informal crossings. The IESC was advised, during the March 2022 site visit, that communities have requested more footbridges and level crossings as a result. It is, however, acknowledged that the betafence has the potential to be vandalised if communities are unsatisfied with the distribution and number of the level crossings and footbridges, and/or where the communities' expectations in terms of employment opportunities during the installation of the betafence are not met.

#### 8.5.3 The Rail Safety Management Plan

The Rail Safety Management Plan is a component of the Road and Rail Safety Management Plan (RRSMP) and has been amended to take account of the MUOA Project. The integration of the TMP 'soft' and 'hard' measures into the Rail Safety Management Plan will be achieved, primarily, by amending the Action Plan associated with the Rail Safety Management Plan component of the RRSMP. The IESC previously reported that a review by Policy Lenders and the IESC found that the integration of the TMP measures into the Rail Safety Management Plan was not adequate. A second revision of the Plan, prepared by CBG, was submitted to the IESC and Policy Lenders for review and is considered satisfactory pending confirmation of budget available for implementation of Rail Safety Action Plan.



**Table 8-2: Summary of Findings, PS4**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2022_022	MUOA Project/railway safety	Delays on betafences and footbridges installation result in ongoing risk of serious injuries/fatalities involving community members in urban areas.	Construction	Liaison with the procurement department with respect to delays in the procurement process and how this can be expedited, with particular emphasis afforded to the installation of fencing at the highest risk areas	<b>High</b>
March 2022_023	Hommes Piquets	Based on the IESC's impromptu meetings with Hommes Piquets it was found that lacked information and authority to perform their duties, including: <ul style="list-style-type: none"> <li>• No train timetable</li> <li>• No means or authority to stop the train in an emergency situation</li> <li>• Poor understanding of their own risks</li> </ul>		The hommes piquet need to be better trained and supervised. They should be more aware of emergency procedures and their roles and responsibilities.  CBG should use an official and more-structured control system for rail activities. CBG need to confirm that all personnel present along the railway are aware before the passage of trains. Kilometre posts need to be installed, alongside railway signs for the communities, and a way to communicate the train schedule to the hommes piquet needs to be identified and implemented.  All hommes piquet should be issued with VHF radio/other means of communication such that they can communicate with the train driver. Training in Railway Safety Communications Procedures, as prescribed in the Road and Rail Safety Management Plan, should be provided.	<b>Moderate</b>
March 2022_024	MUOA Project	Risks of opposition to betafence and footbridge installation due to unrealistic expectations of associated employment opportunities prior to their installation/construction and short-term impact of the betafence on the daily life of inhabitants, especially in Kamsar.	Construction	Close liaison (between the CFB and CR teams) on installation to avoid community opposition and manage employment-related expectations among communities.  Engagement with the affected communities when betafence, level crossings and footbridges are installed to evaluate the degree of acceptance of these features and determine whether additional measures are required in order to avoid opposition, maintain social cohesion and ensure access to basic infrastructures on both sides.	<b>Moderate</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2022_025	MUOA Project	Use of stepped footbridges will prevent their use by people with physical disabilities. People unable to climb and descend steps will have to use level crossings.	Operations	Engage with communities to evaluate the number and residence of persons with reduced mobility (e.g. due to age or physical disability) that will not be able to use the footbridges.  Explore mitigation measures to alleviate risk of pedestrian accidents, including physical separation of vehicles and pedestrians at level crossings.	<b>Minor</b>
March 2022_026	Communicable Disease Prevention	The HIV and AIDS programme, as specified in the Community Health and Safety Management Plan, is no longer in place (no activities were undertaken in 2021 due to budget constraints; the availability of budget to implement activities in 2022 is yet to be determined).	All	HSECQ to liaise with the appropriate departments to ensure hand over of responsibility and allocate budget to resume programme.	<b>Minor</b>
March 2022_027	Communicable Disease Prevention	Delays to the implementation of the joint malaria programme	All	Finalise and validate the ToR to relaunch the joint malaria programme.	<b>Minor</b>

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in Appendix 3 of this report.

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

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

#### 9.1.1 Resettlement Physical Aspects

##### 9.1.1.1 Hamdallaye

The IESC was able to verify that most previously outstanding works with regards to **community infrastructure** have now been completed. This includes:

- The 6-classroom school, which is complete, fully equipped (including adequate sanitary facilities), and where teachers have been allocated by the relevant Government department. Teaching is ongoing per normal conditions.
- Housing for the school director, which is also complete. The IESC notes that, at the time of the March 2022 site visit, this house was not in use. According to CBG, teachers commute daily from Sangarédi. The Hamdallaye Resettlement Committee request further equipment of these houses.
- The health post, which is complete, equipped and where staff have also been allocated by the relevant Government department. Patients are able to receive primary level health care at this health post. The Hamdallaye Resettlement Committee verbally complained in a meeting with the IESC that no medicine was available (which is normal in the IESC's view). However, CBG reported that an initial allocation of medicine had been made. It is not unlikely that no provisions were made by the community to manage and renew this initial allocation.
- Housing for the health post staff, which is also complete but not in use at the time of the March 2022 site visit.
- The mosque, to which, interestingly, the community by themselves have added a separately building reportedly meant as a prayer room for women. The Hamdallaye Resettlement Committee are requesting that electricity and a sound system be installed.
- The construction of the youth centre is complete but could not be handed over to the community as they complained of lack of furniture and equipment. The Hamdallaye Resettlement Committee are requesting further equipment, including furniture, electricity, and a sound system. It also appeared, in the conversation held with the Hamdallaye Resettlement Committee, that they had devised no specific plan to utilise and manage the site properly (e.g. activities at the centre not quite defined, and there is no cost recovery mechanism in place).
- CBG have also improved drainage at the resettlement site, with significant works carried out to improve run-off water catchment. However, the Hamdallaye Resettlement Committee and CBG staff themselves have observed that there are still two areas within the resettlement site where flooding takes place, with potential damage to structures as a result. CBG reported that further monitoring would be undertaken during the rainy season to define any further necessary works.
- The six boreholes with handpumps committed upon in the RAP are operational.

With regards to **private resettlement dwellings** and their ancillary structures (e.g. kitchens, latrines), CBG has embarked on a programme of repairs, adopting a punch-list approach as per one of the IESC's previous recommendations. This was done after houses were handed over to

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the Project-affected persons (PAPs) and is now complete. In addition, and more recently, the satisfaction survey that the IESC had previously recommended was undertaken between November 2021 and January 2022. This provides a full picture of the current situation of buildings and helps to identify pending issues. Most identified outstanding issues relate to leaking roofs, rainwater infiltration through the walls (observed on site by the IESC), door locks, and poor fixation of door or window frames (also observed by the IESC). CBG reported that they are considering engaging a construction contractor specifically to ensure that any such further defects can be fixed within a one-year period. This is a commendable approach and should be implemented. For example, the relatively minor water tightness issues in resettlement house walls may have potential to aggravate in time.

**Solid waste management** at the resettlement site is not satisfactory. Several small, unmanaged dumps were observed by the IESC during the March 2022 site visit. The Commune waste management is not operational at the Hamdallaye resettlement site and it appears that there are no alternative arrangements. This issue needs to be tackled by the Hamdallaye Resettlement Committee based on engagement and training to be organised by CBG. At this point, the most realistic arrangement is probably for an Economic Interest Groups (GIE) to be set-up in this purpose, with a few youths from the community, and a minimal fee collection system (to be paid by residents themselves) to be put in place for these youths to collect and dispose of the waste. This should be done prior to the upcoming rainy season.

**Shade and fruit tree plantations** established by CBG in successive waves since the inception of site development were observed to have been generally successful, particularly where relatively large trees were planted rather than very young seedlings. There are now young trees at the site in a density that appears to be generally adequate<sup>22</sup>. These trees are not productive but, as committed in the RAP, PAPs still have access to their trees in old Hamdallaye.

In terms of **soil reclamation**:

- Work is still on-going on the “*tapades*” to complement topsoil restoration (by adding more topsoil). Works have to be completed on 23 land plots within the resettlement site. Rapid observation at the site suggests that little of the reclaimed land is actually cultivated at this point (to be monitored during the forthcoming rainy season). As noted before, the soil and sub-soil at Hamdallaye resettlement site are not conducive to agricultural activities.
- The areas dedicated to Income-Generating Activities (IGAs) are generally complete from a soil restoration perspective, although the Hamdallaye Resettlement Committee have complained that there is not enough topsoil at the gardening site (intended to be irrigated), which reportedly makes cultivation at the site difficult. Observations of the site during the March 2022 site visit suggests that the soil quality and deepness remain a challenge.
- The 56-Ha area meant to serve as replacement agricultural land (not irrigated) was not delivered to PAPs yet. It is currently fallow with reasonable herbaceous vegetation growth. Actual delivery to affected people for farming is envisioned for the 2023 rainy season. CBG reported that: (1) a land allocation scheme to each Hamdallaye family had been devised and consulted upon with the community, with delineation of individual agricultural land plots and allocation, and (2) further reclamation work would be undertaken to eliminate some remaining issues with large boulders and topographical unevenness.

In terms of **security of tenure**:

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<sup>22</sup> Note, though, that the whole site could not be checked by the IESC.

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- There has been no progress in formal, State-endorsed allocation of residential land at the Hamdallaye resettlement site. The detailed process of obtaining allocation of residential land should be checked by CBG with the relevant State department in Boké (Service de l'Urbanisme) and with the Sangarédi Commune. Based on the IESC's experience<sup>23</sup>, it would typically entail the establishment of a "Lotissement", a process which is well defined in Guinean law and procedures, further allocation of land plots within this "Lotissement" to identified individuals, and lastly generation of a land title (usually a "Permis d'Occuper" in the first stage and subsequently a full land title). The full process must be checked in detail with the relevant State authority and the Commune, and implementation by this authority should follow, with CBG facilitating the process.
- The process for formal, secure allocation of agricultural land (a 56-Ha area) and areas dedicated to IGAs should similarly be checked by CBG. This has been initiated by CBG in cooperation with the Sangarédi Commune.

## 9.1.1.2 Fassaly Fouthabé

From a technical perspective, CBG's commitments are met in the sense that:

- The bridge is complete.
- The prayer room is complete.
- The school is complete, though it is not staffed yet, in spite of CBG reportedly meeting regularly with the relevant authority to ensure that teachers be allocated.
- Boreholes are complete, though not all of them are fully used. Another 2 boreholes have been drilled further to the Fassaly Fouthabé complaint related to the degradation of the water quality in the local stream.

Regarding the school (and this applies to other schools built by CBG such as Parawi and Paragogo), it is becoming quite clear to the IESC that it is most unlikely that the State will be in a position to allocate teachers to these schools in the short-term. All attempts at engaging the responsible government authority have delivered no results. Well-built schools are therefore empty, for which the communities blame CBG, even though the responsibility is normally with the State. Alternative avenues should be explored such as "community teachers" ("*maîtres communautaires*"), the salaries of whom could initially be supported by CBG, subject to certain commitments being made by the community (e.g. taking full responsibility for paying salaries after a defined period of time, ensuring that teachers are accommodated and fed).

Other than planning an internal meeting on this topic, there has been no substantial progress in implementing a previous IESC recommendation related to the assessment of cumulative impacts, and of the overall long-term viability of Fassaly Fouthabé village in the context of CBG's multiple and rapidly expanding bauxite mining sites in the vicinity of the village.

## 9.1.2 Livelihood Restoration

## 9.1.2.1 Hamdallaye

The status of the IGAs in Hamdallaye is as follows:

- **Gardening**
  - Two predominantly female "Groupements d'Intérêt Economique" (Economic Interest Groups - GIE) have been set up. A gardening area was earmarked (4 Ha in size), reinstated (topsoil) and developed for drip irrigation, with boreholes,

<sup>23</sup> Provided for general guidance only, each stage to be checked by CBG with the relevant authority.

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electrical pumps and an associated generator, elevated tanks, and a piped water distribution system with drippers. This scheme was partly used in the 2019 and 2020 gardening seasons, but has not been used since. It was observed at the Hamdallaye resettlement site that the equipment is no longer operational, with some of the plastic elevated tanks, pipes and drippers having been stolen or dismantled. The land is currently empty and fallow. The two GIEs were interviewed by the IESC and reported that, after two gardening campaigns with limited or no income, they became discouraged. They believe that the gardening areas are inadequate for gardening. CBG proposed to develop, temporarily another, smaller area in the Ndangara Valley but this proposal collapsed, with some GIE representatives requesting that CBG provide them with money rather than developing a gardening area. Nevertheless, in a meeting with the IESC, representatives of one of the GIEs mentioned that they are still motivated to pursue gardening. CBG have prepared principles for a preliminary gardening redevelopment plan, including a smaller and simpler irrigated scheme (2 Ha in size) at the Hamdallaye resettlement site, a solar generator (as opposed to a diesel generator), better soil reinstatement (with the provision of additional clay and topsoil), and a generally “low-tech” design. A new site near N’Dangara forest is being identified.

- **Small ruminants:**

- This activity was not active at the time of the March 2022 site visit. It was reported by CECI, the implementation partner, and the beneficiary GIE, that goats had been delivered and that a 1-Ha forage plant field had been prepared. The three buildings meant for the activity are in place (two pens and a storage building). The beneficiary GIE indicated, however, that they did not accept the goats, as they were smaller than expected, and reportedly ill, though this was disputed by CECI. These goats are currently roaming throughout the Hamdallaye resettlement site, being led every night to the structures built for them by individuals paid by CECI for these services. The GIE appears not to be operational.

- **Poultry:**

- A thousand three-week old chickens were delivered to the GIE approximately 1 year ago. At this time, the sanitary status of the animals was good. Animal feed is still provided by CECI and includes imported feed as CECI reported that no locally produced feed was suitable. The IESC does, however, have concerns about the economic sustainability of this venture if its current organisation is maintained. It remains highly dependent on CECI support. The implementation partner admitted that selling eggs as the main objective of the venture may not be profitable. CBG have requested an updated business plan. In this context, the very principles of the venture may need to be revisited, with economic and technical sustainability being the only focus. The GIE should be self-sustaining in terms of feed, marketing and renewing animal stock, otherwise it will collapse as soon as CECI support is withdrawn.

- **Grasscutters:**

- This activity had not fully commenced at the time of the March 2022 site visit. The GIE have a building available, but the training has not been conducted and animals have not been delivered. CECI reported that they expected both training and animal delivery to take place in the near future, and that they would support

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hydroponic<sup>24</sup> forage production to mitigate the absence of feed production. The success of this approach, however, is yet to be determined.

- **Bakery:**

- When the IESC met remotely with the GIEs in August 2021, this activity appeared to be working well. GIE members were quite enthusiastic and had already obtained encouraging results, with both production and marketing reported to be well established. During the March 2022 site visit, it was found that the activity has stopped. The GIE reported that no start-up fund had been provided by CECI and that, therefore, GIE members initially financed flour and other necessary materials themselves. Eventually, however, they had to stop the activity as a result of lack of cash to purchase further materials.

To summarise the IGAs, only one activity is currently working (poultry) and its sustainability remains disputable. This is a significant failure. The premises on which these activities were designed were generally wrong in the context. The IESC expressed doubts in this regard at the time of the July 2019 site visit. Such premises need to be revisited.

#### 9.1.2.2 Fassaly Fouthabé

The situation is slightly better in Fassaly Fouthabé than in Hamdallaye, though falls short of expectations. Reaching livelihood restoration objectives will be challenging unless the premises upon which the activities were designed are revisited similar to in the case of Hamdallaye.

To further elaborate:

- **Gardening:**

- The technical premises are similar to those in Hamdallaye. The GIE has been established but no activity took place in 2021 – 2022 as a result of a bush fire at the site. It is unclear whether the water supply system is operational.

- **Small ruminants:**

- Goats have been delivered and are being taken care of by people paid for by CECI. They too are roaming haphazardly through village lands and no intensive breeding method is in place. GIE members stated to the IESC that they would rather engage in another activity (with reference to fish farming).

- **Poultry and grasscutters:**

- The situation of both activities is similar to that as described for Hamdallaye.

#### 9.1.3 Recommendations

##### 9.1.3.1 Introduction: Urbanisation of the Hamdallaye Resettlement Site

Although it was the first village outside of Sangarédi town when leaving Sangarédi westwards on the road towards Boké, the old Hamdallaye village was a rural community with “*tapade*” land, fruit trees and nearby fertile agricultural land. While some residents also had houses in Sangarédi and were commuting from the town to farm in Hamdallaye, the community had nonetheless a clear rural character, with livelihood activities predominantly of a rural nature, namely agriculture.

Compared to the previous location of Hamdallaye village, the Hamdallaye resettlement site has moved eastwards towards the urbanised area of Sangarédi town by approximately 2.5 km (if

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<sup>24</sup> a system of growing crops without soil with the plant roots grown in a liquid nutrient solution or inside the moist inert materials

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considering the geographic centres of both the old and new villages). A rapid analysis of sequential satellite imagery between 2011 and 2021 suggests that the western edge of the urbanised area of Sangarédi has progressed westwards by about 1,000 metres in 10 years. Should this pace be maintained, the Hamdallaye resettlement site will become part of the Sangarédi urban area in approximately 5 to 10 years (the IESC observed that urbanisation in the western fringes of Sangarédi town is progressing more quickly since the Hamdallaye resettlement site was developed).

#### 9.1.3.2 Recommendations – Hamdallaye and Fassaly Fouthabé RAP – Physical Aspects

The IESC recommends the following actions with respect to the Hamdallaye resettlement site:

- Monitor potential flooding during the rainy season and plan corrective works accordingly.
- Facilitate the establishment of a sustainable solid waste collection and elimination system based on the Hamdallaye Resettlement Committee (or a sub-entity thereof, such as a youth GIE) taking responsibility for solid waste management with further engagement and training to be organised by CBG. A fee collection system needs to be established in order for this system to become sustainable.
- Manage certain unreasonable expectations from the Hamdallaye Resettlement Committee with regards to community infrastructure (e.g. mosque, youth centre), strengthen management capacity for these and finalise handover accordingly.
- Reiterate the general principles that, after handover, CBG will not be involved in operation, maintenance and management of community facilities, solid waste collection, road maintenance and so forth, and seek to obtain clear and contractualised handover modalities for each of these aspects.
- Launch the land tenure formalisation and securisation process by seeking advice thereupon from the relevant State department in Boké and implementing associated steps based on their advice. Give priority, as a first step, to the formalisation and securitisation of residential land, before addressing agricultural land. Liaise with neighbouring bauxite mining operation Guinea Alumina Corporation (GAC) to understand how they obtained security of tenure for those affected by displacement. Incorporate gender aspects into the approach such that women are not excluded from land and property ownership.

The IESC recommends the following actions with respect to Fassaly Fouthabé:

- While continuing to liaise with the local education directorate, to obtain allocation of teachers for the reconstructed Fassaly Fouthabé school, explore alternative avenues with the community (e.g. “maîtres communautaires”).
- Prepare a long-term assessment of the situation of mining and hauling cumulative impacts around Fassaly Fouthabé and consult with the community (a reiterated recommendation, see also Section 9.1.1.2).

#### 9.1.3.3 Recommendations – Hamdallaye and Fassaly Fouthabé RAP – Livelihood Restoration

The IESC recommends that CBG, based on its commendable preliminary efforts, prepare a comprehensive corrective action plan for all livelihood restoration activities in both locations which:

- Takes a broader perspective of the likely evolution of the two communities (particularly the rapid urbanisation of Hamdallaye) and takes this evolution into consideration in properly scoping and devising proposed activities.



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- Takes account of the generational gaps between older people (that mainly focus on agriculture) and younger people (whose interest is not in agriculture, particularly given the more urban context in which they are now living).
- Seeks better integration between livelihood restoration and CBG procurement and recruitment needs. In this context:
  - Consider better integration between gardening activities and CBG’s catering needs; and
  - Investigate how some youths from the affected communities could be trained for potential CBG direct or indirect jobs.
- Considers broadening the scope of livelihood restoration to more non-agricultural activities, including vocational training relevant to “urban” and mining jobs, and small business development.
- Revisits completely the premises of gardening activities at both sites, though with a more radical change at Hamdallaye Resettlement Site, by:
  - eliminating drip irrigation, which can only fail, as amply demonstrated almost everywhere in West Africa for similar schemes;
  - using lessons from successful benchmarks in the area<sup>25</sup>;
  - keeping the overall scheme as “low-tech” as possible, minimising all recurrent expenses (e.g. use of solar rather than diesel);
  - significantly reducing the overall size of the gardening areas to something that GIEs can manage;
  - considering a modular approach of starting small and expanding later if and when the small initial phase has demonstrated success;
  - considering a complete change of the Hamdallaye gardening areas, potentially looking for a more favourable site in the Ndangara Valley (with compensation of the related land to traditional landowners).
- Revisits the principles of the poultry projects, prioritising the principle of sustainability over the principle of productivity, basing the projects on a more sustainable approach whereby the GIEs can produce feed (or at least most of the feed) themselves.
- Revisits the goat projects, or considers abandoning them.
- Updates the action plan for the grasscutter projects.
- Provides a revolving fund (or other substantial material support) to the bakery project according to modalities to be discussed and formally agreed upon with the bakers’ GIE.
- Introduces a stronger business development component into livelihood restoration activities, based on the expertise of CECI and involving, if needed and relevant, micro-finance institutions active in Guinea.
- Establishes strong, day-to-day CBG oversight over CECI, evaluate performance of each of the CECI sub-contractors, and considers requiring CECI to replace those subcontractors that have proved ineffective. Consider reducing CECI’s scope to areas where they have

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<sup>25</sup> *For example, a small group of Parawi young men has established two gardens, one of which was visited by the IESC and appears quite successful. The Bel Air bauxite mine in Boffa region also established some years ago several gardens which, when visited for other purposes by the IESC expert in early 2019, had been found to be very successful.*

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proven expertise and have delivered results, seeking alternative implementation arrangements for other components (e.g. gardening). Establish a weekly reporting system, whereby CECI is obliged to provide a short, one-page weekly update on their activities and way forward for the following weeks. Require CECI to significantly strengthen its presence in the Sangarédi area and eliminate unnecessary CECI “supervision” from Conakry, which is now proven to not achieve its purpose.

- Formalizes all of the above in an addendum to the Hamdallaye and Fassaly Fouthabé RAP to be submitted to Policy Lenders and the IESC, as a Corrective Livelihood Restoration Plan as a priority. The document should be brief and operational and include the following aspects:
  - Reflection of the urbanisation of Hamdallaye into new, business- and employability-oriented activities.
  - Action plans for each of the components (including a brief description of status and technical plan, implementation arrangements, including implementation partners and their sub-contractors, budget and timeline).
  - Updated monitoring and reporting activities.
  - Description of CBG oversight, including control of delivery, quality, cost and timeline.

**9.2 Compensation Matrix**

The IESC learned during the March 2022 site visit that an updated compensation matrix was about to be finalised. It is recommended that this compensation matrix be submitted to the IESC and Policy Lenders for review and feedback before being submitted to the relevant Government authorities.

**9.3 LRPs****9.3.1 Kankalaré RAP and LRP**

The status of activities planned under the Kankalaré RAP and LRP (now integrated into a single document) was found during the March 2022 site visit to be as follows:

- Telibofé footbridge over the railway and fence; this facility was visited by the IESC at the time of the site visit. Construction is confirmed to be fully complete (including the fence) and is fully satisfactory.
- The rest of the infrastructure, including wells and associated iron removal devices, and the schools at Niangaba and Parawi, as well as the health post in Parawi, are complete. These facilities have been formally handed over to the relevant authorities. However, no staff have been posted at either of the schools or at the health post in Parawi, in spite of CBG’s reported efforts to engage the relevant authorities.

In terms of livelihood restoration planning and implementation, a new version of the integrated RAP-LRP was submitted in December 2021. Policy Lenders sign-off is expected shortly. The status of implementation is as follows:

- Livelihood restoration services were consolidated between the Kankalaré LRP and the Thiapikouré LRP; there will be one single implementation partner and one contract for both LRPs.
- The service provider was selected – Phenix Experts – a rural development consulting company from Conakry.

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- Contract negotiations are reported by CBG to be nearing completion, and the contract should be effective in late March 2022.

Due to the delay in starting up livelihood restoration activities, it had been agreed that transitional livelihood support measures would be delivered in the form of food assistance. People from the Parawi community interviewed by the IESC have confirmed that such assistance was indeed delivered in July-August 2021. It included rice, sugar, oil, and tomato concentrate.

### 9.3.2 Thiapikouré LRP

Implementation of this LRP is now consolidated with Kankalaré's (refer to Section 9.3.1 for commentary on its current status).

The IESC had a meeting with the Paragogo community, which is affected by this LRP. They confirmed delivery in September 2021 of the food assistance transitional measures per similar modalities as in Kankalaré. In the meeting held by the IESC, female representatives expressed the desire for such assistance to be repeated. Young people insisted on livelihood restoration measures, including a training and employability component.

### 9.3.3 Forthcoming LRPs

A number of LRPs are currently being prepared, as follows:

- Kagnéka and Parawi Extensions:
  - the LRP was submitted in September 2021, with final comments expected shortly;
  - scope of work prepared for implementation partner;
  - procurement not started and thus activities not started.
- "Contingency Blocks":
  - the LRP was submitted in September 2021, with final comments expected shortly;
  - scope of work prepared for implementation partner;
  - procurement not yet started and thus activities not yet started.
- "MOUA" (that is, the railway):
  - the LRP has been validated by the IESC and Policy Lenders;
  - a service provider has been selected (Phenix Experts from Conakry);
  - contract negotiations are virtually complete, with the contract expected to be signed in March 2022;
  - review of impacts per PAP through establishment of compensation database; and
  - potential revision of eligibility criteria where impacts are minimal.

### 9.3.4 Conclusions and Recommendations on LRPs

Some of the recommendations pertaining to the Hamdallaye and Fassaly Fouthabé RAP livelihood restoration apply, to an extent, to other LRPs. The IESC's community meetings in Parawi (related to the Kankalaré LRP) and Paragogo (in connection with the Thiapikouré LRP) confirmed that there is a growing expectation from the younger generation that livelihood restoration activities should encompass support for employability and small business creation. It is therefore

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recommended to revisit the scope of the implementation partners currently being procured to reflect the following:

- stronger business and employability components; and
- lessons learned from issues encountered at Hamdallaye and Fassaly Fouthabé.

In addition, it is noted that the implementation of the Kankalaré and Thiapikouré LRPs (now consolidated into one package) is yet to commence. Lack of implementation can also be noted with respect to the MUOA LRP. Interim support measures (e.g. food provisions) may therefore need to be repeated. In this context, CBG should assess the need to repeat these measures.

Lastly, the CBG team correctly noted that the eligibility criteria for the MUOA LRP may need to be revisited as some of the affected people experience very marginal impacts only. The IESC welcomes any proposal from CBG in this regard.

**9.4 Cumulative Impacts**

The recommendation made in previous Monitoring Reports to use CBG's GIS capability (which is now available) to identify and assess potential cumulative impacts on some communities (e.g. Fassaly Fouthabé, Hamdallaye, Parawi and Paragogo, amongst others) does not appear to have been acted upon. The concerns expressed in the 3<sup>rd</sup> August 2021 meeting by Fassaly Fouthabé representatives with regards to the long-term viability of their community in its current location reinforces the need to make this recommendation a priority.

During the March 2022 site visit, in which a number of separate plateaus were visited, the IESC was able to confirm that mining activity is concurrently ongoing in a large number of locations. Numerous areas are stripped of topsoil with no or limited active mining going on. Others are being mined superficially over a depth of a few metres, then abandoned for a number of months or years, before being mined and potentially abandoned again without being restored. The resulting footprint at a given point in time is disproportionate. There is no apparent effort to minimise the footprint of mining activity. The IESC understands that this approach to operations is driven by the commercial requirement to supply the market with bauxite of a constant grade (hence the concurrent exploitation of a large number of locations and the subsequent ore mixing operations that take place at the Ndangara and Hamdallaye storage areas). It is clear, however, that it is not driven by the PS1 requirement to avoid and minimise impacts. CBG should therefore explore opportunities to minimise the mine's physical footprint, to the extent possible, whilst at the same time still meeting its commercial obligations.

The following recommendation from previous sites visits is hereby reiterated:

- Based on CBG's GIS capacity and using the surveys that have been presented to the IESC, develop a methodology to assess the extent of cumulative impacts to the most affected communities, including Fassaly Fouthabé, to respond to the related community concern over the community's long-term viability in the future.

**9.5 Monitoring**

During the March 2022 site visit, the CBG Resettlement Team submitted excellent status and recommendation presentations to the IESC, a commendable effort. However, it is also noted that no periodic monitoring reports are prepared, that the monitoring framework presented in the CRPF is not implemented at this point, and that no specific resources have yet been allocated to monitoring, in spite of repeated IESC recommendations in this regard. The recommendations from the October 2021 VSV with respect to monitoring are therefore reiterated as follows:

- use the basis that was presented in the VSV, the monitoring principles and the list of indicators presented in the CRPF and LRPs, as prepared by the consultant INSUCO;

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- distinguish *progress* indicators (input-output, i.e., those that are in the current tentative framework presented in the VSV) from *outcome* (or impact) indicators (to be drawn from INSUCO’s work), which will essentially reflect livelihoods and quality of life;
- develop, in addition to indicators, methods and frequencies to collect the related information (e.g. rapid satisfaction surveys, more in-depth livelihood surveys, sampling percentages and methodologies and so forth);
- ensure that the list of indicators is manageable from a workload perspective and that methods and frequencies for gathering the related information are workable and practical – in this context, it is better to have a relatively short list of indicators that the Resettlement Team and/or consultants will actually be able to monitor, rather than a long, aspirational list of indicators which will eventually prove impractical to monitor);
- devise, on that basis, a coherent internal monitoring system; and
- create a dedicated monitoring function within the Resettlement Team and resource it accordingly (tentatively one full-time staff member).

**9.6 Resettlement Implementation Capacity**

## 9.6.1 Findings

The IESC has repeatedly flagged the inadequacy of resources dedicated to compensation, resettlement and livelihood restoration within CBG. In general, this inadequacy still applies as of the March 2022 site visit. The resettlement specialist who left CBG in Q3 / Q4 2021 has been replaced by an experienced resettlement consultant, who is present in Guinea on a half-time basis, and remains available remotely the rest of the time. This is understood to be a temporary solution. In addition, an experienced data management specialist, provided to the resettlement team via consulting firm SIGMA, has been tasked with rationalising PAP databases and compensation data management. The completion of asset inventories and socio-economic surveys, as well as the implementation of livelihood restoration activities, continue to be sub-contracted to a number of companies and NGOs.

Notwithstanding the above, the Resettlement Team remains under-sized relative to the tasks at hand, and as a result lacks supervision capacity with regards to the multiple on-going sub-contracted activities. Also, the procurement process remains very slow, constituting a considerable impediment to the delivery of many activities.

It was noted again, during community meetings undertaken at the time of the March 2022 site visit, that some team members lack sensitivity to gender issues (e.g. not necessarily insisting that women attend meetings, and not addressing women attending meetings in an appropriate manner).

The Sangarédi-based members of the CR team and the Resettlement Team are now accommodated in distant offices, which is also not conducive to cooperation and the mutual integration of activities.

Lastly, the title of the “resettlement specialist” remains ambiguous, specifically whether they have any hierarchical responsibilities over the rest of the Resettlement Team and the accountability associated with this.

## 9.6.2 Recommendations

Recommendations reiterated from the previous VSVs are as follows:

- continue to increase staffing within the Resettlement Team with a focus on livelihood restoration;

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- create a monitoring and evaluation / data management function within the Resettlement Team; and
- seek to establish a better gender balance within the Resettlement Team.

In addition, the following new recommendations are also made:

- train both male and female staff members on basic gender sensitivity;
- seek better integration of the CR and Resettlement teams; and
- clarify positions and titles within the Resettlement Team and identify a permanent Resettlement Manager responsible for leading the team; as noted in Section 5.1.1, currently the role of Resettlement Manager is being fulfilled by the CR Manager.

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**9.7 Photographs**



One of many new houses built by resettlers at the Hamdallaye resettlement site



Addition of a kitchen to a resettlement house



Inadequate solid waste management at the Hamdallaye resettlement site



Successfully planted mango tree



Area dedicated to irrigated gardening at the Hamdallaye resettlement site, now fallow and abandoned



Fassaly Fouthabé poultry IGA

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

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
March 2022_028	Hamdallaye Resettlement Site	Drainage issues partially fixed but some problems remain, resulting in localised flooding, with potential damage to structures as a result.	Operation	Monitor potential flooding during the rainy season and plan corrective works accordingly.	<b>Moderate</b>
March 2022_029	Hamdallaye Resettlement Site	Lack of satisfactory waste collection at Hamdallaye Resettlement Site	Operations	Facilitate the establishment of a sustainable solid waste collection and elimination system and engage the Hamdallaye Resettlement Committee and community members in this respect.	<b>Moderate</b>
March 2022_030	Hamdallaye Resettlement Site	There are numerous requests from the Hamdallaye Resettlement Committee with respect to community infrastructure	Operations	Manage certain unreasonable expectations from the Hamdallaye Resettlement Committee with respect to community infrastructure, strengthen management capacity, and finalise the handover accordingly, based on clear and consulted upon modalities.	<b>Moderate</b>
March 2022_031	Hamdallaye Resettlement Site	While residential and agricultural land at the Hamdallaye resettlement site has been allocated by CBG, this process has not been concluded with the issuance of formal land titles to PAPs by the relevant State agencies.	Operations	Launch the land tenure formalisation and securitisation process; in this context, liaise with neighbouring mining operations (e.g. GAC) to understand how they obtained security of tenure for the PAPs.	<b>High</b>
March 2022_032	Fassaly Fouthabé	School constructed as per the RAP but remains unstaffed.	Operations	While continuing to liaise with the local education directorate to obtain allocation of teachers for the school, explore alternative avenues with the community (e.g. "maîtres communautaires").	<b>High</b>
March 2022_033	Fassaly Fouthabé	Cumulative impacts to the community are potentially high and may become difficult to mitigate.	Operations	Prepare a long-term assessment of the situation of mining and hauling cumulative impacts around Fassaly Fouthabé and consult with the community.	<b>High</b>
March 2022_034	Hamdallaye and Fassaly Fouthabé	Current activities do not meet their intended objectives.	Operations	Prepare a comprehensive corrective action plan for all livelihood restoration activities in both locations, which:	<b>High</b>



ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
	RAP – Livelihood Restoration			<ul style="list-style-type: none"> <li>• takes a broader perspective of the evolution of both communities (particularly the urbanisation of Hamdallaye);</li> <li>• accounts for generational gaps between older and younger people;</li> <li>• seeks better integration between livelihood restoration and CBG's procurement and recruitment needs;</li> <li>• revisits the premises of gardening activities at both sites</li> <li>• revisit the principles of the poultry projects and prioritise sustainability over productivity;</li> <li>• revisit the goat projects or consider abandoning them;</li> <li>• update the action plan for the grasscutter projects;</li> <li>• provide a revolving fund to the bakery project or other substantial material support;</li> <li>• introduce a stronger business development component;</li> <li>• establish strong, day-to-day CBG oversight of CECI; and</li> <li>• formalise all of the above in an addendum to the Hamdallaye and Fassaly Fouthabé RAP.</li> </ul>	
March 2022_035	Compensation matrix	CBG have been working on an update to the compensation matrix	Operations	When available, submit the updated compensation matrix to IESC and Policy Lenders	<b>Minor</b>
March 2022_036	Other LRPs	Thiapikouré, Kankalaré, and MUOA LRPs are about to be contracted to implementation partners	Operations	Review and revisit, as warranted, livelihood restoration activities in light of the recommendations pertaining to the Hamdallaye and Fassaly Fouthabé RAP livelihood restoration activities.	<b>High</b>
March 2022_037	Resources for resettlement implementation	The capacity of the CBG Resettlement Team remains weak with regards to the tasks at hand	Operations	<ul style="list-style-type: none"> <li>• continue to increase staffing within the Resettlement Team with a focus on livelihood restoration;</li> <li>• create a monitoring and evaluation / data management function within the Resettlement Team;</li> </ul>	<b>High</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				<ul style="list-style-type: none"> <li>• seek to establish a better gender balance within the Resettlement Team, and train staff members (both male and female) on basic gender sensitivity;</li> <li>• seek better integration of the CR and Resettlement Teams; and</li> <li>• clarify positions and titles within the Resettlement Team and secure a long-term Resettlement Manager responsible for leading the team.</li> </ul>	

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in Appendix 3 of this report.

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

### 10.1 Introduction

The biodiversity component of the site visit was achieved through a series of meetings between the IFC and IESC biodiversity specialists and the CBG Biodiversity team, as well as field visits. The attendees from the CBG Biodiversity team were:

- Biodiversity Manager;
- Botanical specialist;
- Faunal specialist;
- Rehabilitation specialist;
- Survey and inspection specialists;
- GIS and database specialist; and
- New employees and a Trainee.

The order of topics, presented below, reflects the sequence of the site visit meetings.

### 10.2 Biodiversity Inspections

To monitor the compliance of CBG operations (including the MUOA Project and investigations in the North Cogon concession), and the management of biodiversity issues arising from the activities of SMB-W and COBAD (in the South Cogon concession), the CBG Biodiversity team continues to undertake regular biodiversity inspections and/or contributes to multi-disciplinary E&S inspections, as follows:

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

The scope of the biodiversity inspections remains consistent for all visits and regardless of an inspection team's composition.

However, due to the maternity leave of a member of the biodiversity team, and COVID 19 restrictions only 70 of the 108 planned inspections could be carried out (as shown in Figure 10-1) and the results of some inspections could not be processed in 2021 (18 as shown in Figure 10-2). In order to address this, two new staff members were hired in December 2021 and all team members were approved as biodiversity inspectors in July 2021. The IESC considers the staffing levels of the biodiversity team to be adequate and skills sufficient across the team.

Overall, the IESC is satisfied that there continues to be a clear, well-organised programme for completion of inspections of CBG's operations and SMB-W/COBAD Road activities.

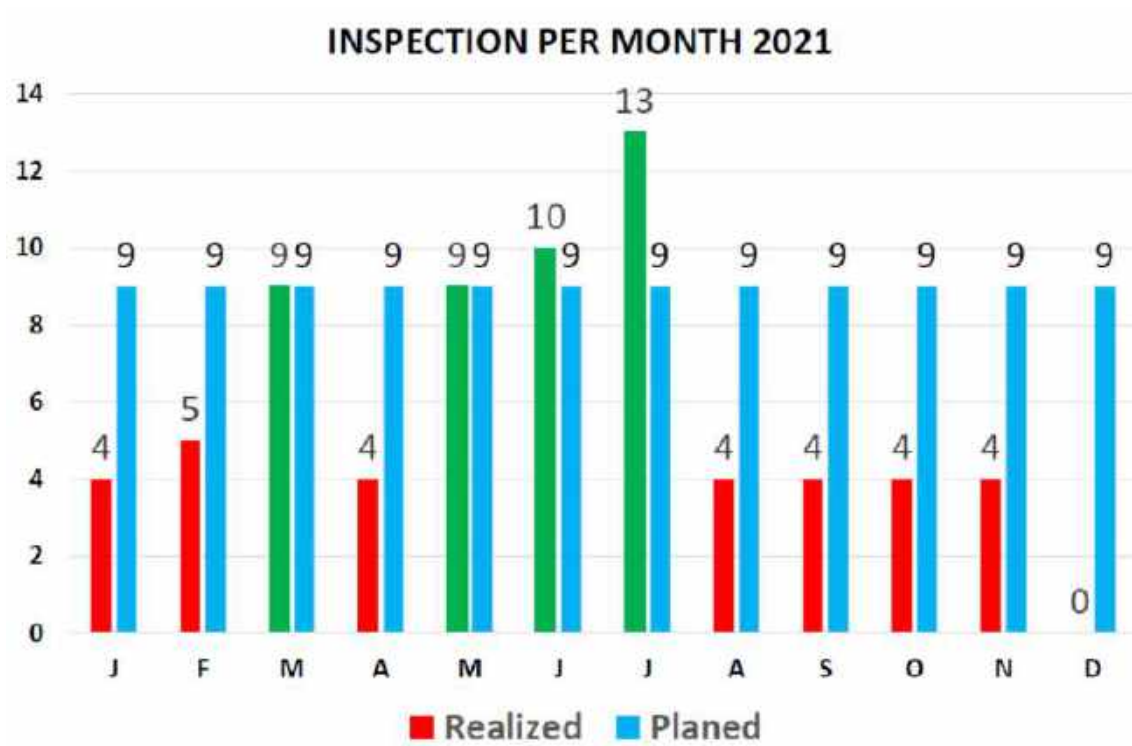


Figure 10-1: Planned vs realised inspections in 2021

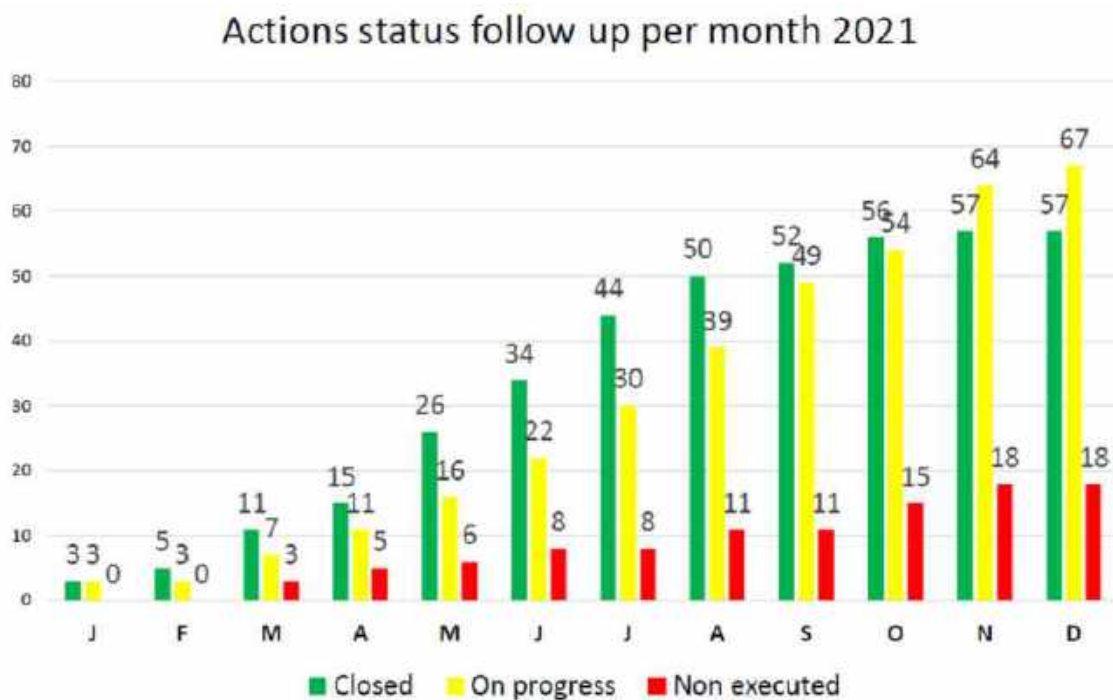


Figure 10-2: Status of inspections in 2021

There is has also been good progress with SMB-W in implementing/closing-out required actions in response to non-conformities while COBAD continues to be somewhat unreceptive to solving problems, particularly its poor erosion control which is the key problem on the old COBAD road.

Three findings/specific locations were considered during the site visit:

- Restoration of the old COBAD road (CBG rehabilitation) at Boulléré;
- A destruction of a bridge near the COBAD road; and
- The SMB-W railway.

At the restored COBAD road, near Boulléré, vetiver plantations prevent erosion and sedimentation of watercourses as shown in figure below.



**Figure 10-3: Vetiver plantation along the restored COBAD Road at Boulléré**

An issue with the bridge joining the old COBAD Road to the GAC concession has been identified previously including most recently during the March 2021 virtual site visit. The bridge has been partially removed (because it was no longer required for once the COBAD Road was rerouted) and a decision on its fate has not been made due to competing social (a desire for increased access to forested areas for charcoal) and ecological pressures (associated with induced human access). During the site visit it was also observed that a ford is used by local people to cross the river, which may contribute to the deterioration of the ecological quality of the river, as shown in figures below.

Recognising the competing social and ecological pressures, the CBG Biodiversity Team considers that bridge restoration (to avoid crossings at the ford) would increase access into the 'Boulléré' Key Biodiversity Area (KBA) for purposes of charcoal extraction. The IESC Biodiversity specialist agrees that the resulting biodiversity impact, should the bridge be reinstated, would be worse than the likely limited impact on aquatic ecology from the use of the ford, noting there has been notable loss of forestry patches within the KBA (and elsewhere in the concession) since pre-pandemic site visits.

CBG's current position is to leave the partially dismantled bridge in place, thus retaining some limited access for community members whilst preventing vehicular crossings/increased access.

This issue requires further discussion and monitoring of any solution proposed to balance the needs of ecological and community interests.



**Figure 10-4: Destruction of a bridge**



**Figure 10-5: Ford used by the local population downstream the destroyed bridge , which might contribute to the deterioration of the ecological quality of the river**

In at least three areas where the SMB-W railway crosses watercourses when built on an embankment the hydraulic crossings are either smaller than optimal to allow fauna species passage at higher flows (in the case of permanent streams) or absent (in the case of temporary streams), as shown in Figure 10-6 below. In addition, this railway could constitute an obstacle to the movement of fauna.

Therefore, it should be examined whether it is possible to find solutions to minimise the barrier effect of the railway. At this stage it would not be possible to re-engineer the crossings and consequently the solution most likely to encourage the passage of fauna would be to plant new woodland and other vegetation either side of the railway to create wildlife corridors leading to the crossings. For example, new planting around the second crossing of the gallery forest as shown in Figure 10-7 would encourage fauna movement underneath.



**Figure 10-6: Small hydraulic crossing in the embankment of SMB-W railway**



**Figure 10-7: Second crossing of Gallery Forest by SMB-W railway**

In addition, the demobilisation and rehabilitation of the SMB-W railway temporary construction areas did not seem to have been fully achieved. The IESC observed one camp being used as a base for monitoring/maintenance. There was also an informal settlement observed and while some are closing down, others are moving to other work camps. Further rehabilitation works are therefore required in areas no longer in use This should be monitored and wherever possible, areas fully rehabilitated.

The IESC notes that SMB established a biodiversity team in August 2021, led by a consultant with experience of the CBG concession. The SMB biodiversity team has been collaborating closely with the CBG biodiversity team, particularly in development of a biodiversity chapter for the SMB ESMP and rehabilitation plan so that it is aligned with CBG's. The IESC encourages ongoing collaboration with SMB in the development of the afore mentioned ESMP biodiversity chapter in order to address the findings made in this report.



### 10.3 Biodiversity Action Plan

The site visit session was intended to discuss progress of specific actions within the BAP in more detail. The framework agreement with The Biodiversity Consultancy (TBC) was signed so that TBC has started to contribute to the implementation of the BAP actions. Delays in the implementation of the BAP have been experienced and all efforts must be made to avoid further delays.

It was agreed during the meeting that CBG would share their BAP tracking document with the IESC for review. At the time of reporting this has not yet been completed however the CBG Reporting on BAP status is to be linked to the work on the ESAP#1 (implementation of the Route Map) and will be subject to ongoing IESC monitoring.

Three items have previously been reported as 'not started' are:

- employee induction;
- fire management; and
- establishing panel.

The first two items are now in progress at the time of reporting.

In terms of monitoring required within the BAP, monitoring of the following species/groups or actions were ongoing at the time of the site visit and the IESC requested that CBG provide monitoring reports as soon as possible. None have been provided at the time of reporting:

- Chimpanzees, Red colobus and other primates;
- Freshwater species;
- Reptiles and amphibians (including the assessment of the threats to these species and proposal of corrective measures);
- Flora;
- Rehabilitated sites;
- Marine/coastal and estuarine fauna and habitats including mangroves;
- Hippopotamus; and
- Vultures.

CBG is supported by a blend of national and international biodiversity experts in its monitoring programmes.

Other actions were ongoing:

- Rehabilitation (nurseries, planting and monitoring);
- Animation of the Bauxite Environment Network; and
- Campaign to raise awareness of biodiversity via the World migratory bird day, meetings with the public, radio programmes.

CBG is still assuming the chairmanship of the Bauxite Environment Network and the following actions were carried out:

- Publication in an international journal;
- Commitment of the leaders of all mining companies;
- Validation of 2021-2022 action plan and budget;
- Signature of partnership collaboration with the Chamber of Mine of Guinea and Quebec Delegation (Consul of Canada) in Dakar with regards to mining cumulative impact management (the first of this kind in Africa);
- Collaboration with the Conservation, Mitigation and Biodiversity Offset (COMBO) project had just commenced at the time of the visit.

During the site visit, the IESC (and IFC) biodiversity specialists visited:

- A Red Colobus monitoring site in Guildhé (see Figure 10-8 below) and met staff from CEMED, the environmental consultancy which monitors the primates and freshwater ecosystem; and
- A nursery (see Figure 10-9 below).



**Figure 10-8: Cogon island, a Red colobus monitoring site in Guildhé**



**Figure 10-9: Nursery**

The community's nurseries produce 200,000 seedlings of local species (*Baobab Adansonia digitata*, *Erythrina africana*, *Azalia africana*, *Khaya senegalensis*, *Erytrophleum sp.*), which seems sufficient to carry out the restoration operations.

No particular problem was mentioned by CBG or observed by the IESC biodiversity specialist for the realisation of these monitoring actions under the BAP except for the sampling of the marine sediments and benthos for which it was not possible to use a dredge due to hard sea conditions; consequently divers will therefore have to be used.

#### **10.4 Five-Year Mine Rehabilitation Plan**

CBG informed the IESC that 293 ha of land have been rehabilitated in 2021 (excluding the 20 ha of mangroves combined), i.e. 35 ha more than planned. During the site visit, IFC and IESC biodiversity specialists visited new and old rehabilitations areas (see figures below).



**Figure 10-11 and 10-12: Rehabilitated mangrove areas in Kamsar – new one (to the left) and old one (to the right)**



**Figure 10-13 and 10-14: New rehabilitated forest area (to the left) and partially destroyed old rehabilitated forest area (to the right) in Sangarédi**

The mangrove rehabilitation appears to be well managed in Kamsar and as shown in the figures the rehabilitated areas show good new mangrove growth.

In Sangarédi, forest rehabilitation is the subject of a great deal of experimentation with different planting methods: with and without topsoil, creating topsoil patches instead of covering the full area. The creation of patches of topsoil instead of covering the whole area seems to better protect the plantations from fire (thus protecting young trees) as the soil is almost bare around the plants and matches natural bowal vegetation much more closely. This is a key initiative for a rehabilitation programme with extremely limited topsoil reserves.

Five species have been identified as native fast growing 'framework' species (initial habitat forming species). Some of these do not require topsoil or additional watering although they remain vulnerable to fire until 1.5m tall.

However, following restoration activities and establishment of good tree growth, communities use and degrade previously rehabilitated forest areas for traditional agricultural practices, including charcoal production in areas with the more established trees. The IESC recommends CBG attempt to agree a rehabilitation approach which accounts for the reuse of rehabilitated areas by local communities to ensure that these replacement natural habitats survive for longer than the current situation. Finally, the Five-year Rehabilitation Plan, Mine Closure Plan and Landscape Level

Rehabilitation Plan should be aligned to ensure consistency in implementation. All the CBG relevant departments must therefore work together to achieve the objectives set out in these plans.

### **10.5 Offsets (Offsite)**

A joint CBG and GAC meeting was held to provide the IESC (and IFC) biodiversity specialists with information on the progress of the offsite offset project, specifically progress in the establishment of the Moyen Bafing National Park.

The Moyen Bafing National Park was created by a Presidential decree, 'signed off' on May 2021. This offsite offset project is entering its transition (implementation) phase:

- Finalisation by the Wild Chimpanzee Foundation (WCF) of the project set up phase;
- Recruitment of the director was scheduled for August 2022;
- Draft of ToR for the transition (implementation) phase and management plan;
- Implementation of the Moyen Bafing project ESIA;
- Monitoring against forest fires and poaching;
- Internal park boundaries have to be defined;
- Reforestation and habitat improvement;
- Extension of temporary field bases planned by WCF;
- Community projects to support local economies;
- Park operator tender for the implementation of public private partnership.

## 11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

The IESC did not revisit CBG's management of cultural heritage issues in detail during the March 2022 site visit. Cultural heritage will be included in the itinerary for the next site visit; in the interim the latest status of IESC findings is presented in the preceding October 2021 IESC Monitoring Report and Appendix 3 of this report.

In addition to early findings/recommendations, CBG has informed that implementation of the CHMP is ongoing and KPIs will start to be reported, in line with the CHMP, in 2022. The KPIs include cultural heritage community complaints and incidents reported by CBG and its contractors. For both, CBG has reported zero.

The cultural heritage team actively monitors known sites of cultural heritage value. In 2022, through to the time of the site visit, 25 sites had been visited/inspected.

## **APPENDIX 1 SITE VISIT ITINERARY**

**CBG Site Visit, week commencing 28<sup>th</sup> February 2022**

Day 1. Monday 28th February

Time slot	Env	H&S	Social (excluding resettlement)	Resettlement	Biodiversity
12.00-14.00	<ul style="list-style-type: none"> <li>- Project status update including               <ul style="list-style-type: none"> <li>o Presentation /Opening Statement</li> <li>o CBG Installation Layout Mine to Port</li> <li>o latest on mine plan and recent LDPs (South of Cogon)</li> <li>o Operation status of Dryer, 1, 2, 3 and 4</li> <li>o Update for MUOA project</li> <li>o Exploration activities NoC</li> <li>o Dredging</li> <li>o Review of ESAP item</li> </ul> </li> </ul>				
16.00-17.00	<ul style="list-style-type: none"> <li>- ESAP Item 1 – Road Map</li> <li>- H&amp;S Organization and Resourcing</li> <li>- 2021 H&amp;S performance (key monitoring programs, key metrics)</li> <li>- Integrated Management System</li> <li>- Findings and actions from the ALCOA H&amp;S visit.</li> </ul>		<ul style="list-style-type: none"> <li>- Join Env and H&amp;S teams</li> <li>- CR Teams: staff resources; equipment and training (training progress)</li> <li>- ISOMETRIX: Implementation and Performance</li> <li>- Grievance management</li> </ul>	<ul style="list-style-type: none"> <li>- Travel to Sangaredi</li> </ul>	



Day 2. Tuesday 1<sup>st</sup> March

Time slot	Environmental	H&S	Social	Resettlement	Biodiversity
First light/ morning	MUOA - Progress with community safety measures - erection of fences and footbridges along railway - Other measures in place to minimise community incidents - Upgrades to level crossings			Visit to Hamdallaye resettlement site, including inspection of individual houses, community facilities, replacement land and livelihood restoration activities  Visit to Fassaly Fouthabé – inspection of bridge and school, as well as livelihood restoration activities – community meeting in Fassaly Fouthabé, including resettlement committee and GIEs	Inspection of reinstated areas in Kamsar e.g. damaged mangroves  Travel to Sangredi
Afternoon	Visit to mine site and active blasting and surface miner activities - PLATEAU MBOURORÉ 1A (VILLAGE FASSALY FOUTHABÉ)  - Active mine site and haul roads. - Sangaredi wastewater treatment facility - Sangaredi waste facility - Workshops (and labs) - PCC Mine control station		- Inspect contractors' facilities, including facilities provided to security contractors.  - Mbourere (new plateau) – general appreciation of receptors	Visit to Telibofi, including footbridge and brief interaction with community  Evening: meeting with Hamdallaye resettlement committee (N'dangara)	Office sessions: - General update: overall progress, staffing, resourcing - Review of BAP/BMR + BMEP: update process, implementation to date - Review of surveys+ monitoring: findings to date, key trends - Biodiversity Inspections: - Examples of inspections completed - Review of inspection register - Non-conformities - SMB + COBAD - Update on BEN/REB - Offset session (MBOP)

Day 3. Wednesday 2<sup>nd</sup> March

Time slot	Env	H&S	Social (incl)	Resettlement	Biodiversity
All day	<p>Travel back to Kamsar – first light</p> <p>Port walk-through inspection, inclusive of the following facilities:</p> <ul style="list-style-type: none"> <li>- Areas prone to fugitive emissions around Kamsar – conveyor belt network and the building prior to the jetty conveyor belt. Inspect dust levels inside/working conditions.</li> <li>- Operational OWS and effluent collection network (including visit to oil sources at workshops and power station)</li> <li>- Non-operational OWS.</li> <li>- OSRP equipment – storage, maintenance, accessibility</li> <li>- AQ monitoring station/CBG lab</li> <li>- Dryer 1, 2, 3 and Dryer 4 facilities – control room.</li> <li>- New and Old tipplers</li> <li>- Jetty and port area</li> <li>- Existing loco workshop/fuel storage and handling</li> <li>- New MUOA loco workshop – status of construction/ HSE management of construction activities</li> <li>- Tora Bora site plus temporary waste storage areas (various locations)</li> <li>- Visit to ANAIM hospital</li> </ul> <p>Will include inspection of safety measures, discussions with contractors</p>		<p>Community Health and Safety Management Plan</p> <p>Road and Railway Safety Management Plan (including discussion on rail incidents, including but not limited to incidents involving people with mental health issues/ /other community incidents)</p> <p>Community Mobility Study</p> <p>Implementation of blasting protocol</p> <p>Inspect contractors' facilities, including facilities provided to security contractors.</p>	<p>Visit to areas covered by LRPs in preparation</p> <ul style="list-style-type: none"> <li>- Contingency block</li> <li>- Plateau (Parawi/ Ndangara/Kagneka) LRPs</li> </ul> <p>View livelihood restoration activities and any other community investment projects</p> <ul style="list-style-type: none"> <li>- Kankalaré (implementation of LRP actions/meetings with PAPs and implementation partners)</li> <li>- Thiapikouré (implementation of LRP actions /meetings with PAPs and implementation partners)</li> </ul>	<p>Site visits</p> <ul style="list-style-type: none"> <li>- On-site avoidance areas adjacent to active mining areas + locations of recent/major non-conformances (to be selected based office sessions)</li> <li>- COBAD Road, including the reinstated areas and Parawi stockpile</li> <li>- SMB site</li> <li>- Rehabilitated areas (recent and historical)</li> <li>- Plant nursery</li> <li>- Cogon Island</li> </ul>

Day 4. Thursday 3<sup>rd</sup> March

Time slot	HSE	H&S	Social	Resettlement	Biodiversity
Morning	<p>Management of Change (MoC)</p> <p>Status/implementation of management plans (in order of priority)</p> <ul style="list-style-type: none"> <li>- EMoP – general status update</li> <li>- AQMP (including evidence of maintenance undertaken for wet scrubbers)</li> <li>- Noise and Vibration (including blasting)</li> <li>- Waste management</li> </ul>	<p>Review of H&amp;S MS elements</p> <ul style="list-style-type: none"> <li>- Adequacy of OHS documentation (policies, manuals, SOPs, plans)</li> <li>- Incident investigation and root cause analysis</li> <li>- Resourcing levels</li> <li>- Training and competency management for CBG employees and contractors</li> <li>- Contractor management including H&amp;S contractual obligations placed on contractors.</li> <li>- H&amp;S Communication and workforce engagement including with contractors.</li> </ul>	<p>CR Teams: staff resources; equipment and training (training progress)</p> <p>Stakeholder engagement and community grievances (including the grievance related to the Hamdallaye pastoralists)/doléances</p> <p>Influx Management Plan: Action Plan Implementation Update</p>	<p>LRP preparation/ implementation – meeting with implementation partner(s), and consultants if warranted</p> <ul style="list-style-type: none"> <li>- Thiapikouré LRP</li> <li>- MUOA LRP</li> <li>- Hamdallaye</li> <li>- Fassaly Fouthabé</li> <li>- Kankalaré</li> <li>- Thiapikouré</li> </ul>	<p>Continue with additional site visit and office sessions from Day 3</p>
Afternoon	<p>Water management (including session on oil/water separator)</p> <p>Hazardous materials</p> <p>Resource use and energy efficiency</p> <p>Dredging</p>	<ul style="list-style-type: none"> <li>- Management of operational safety risks for both controlled and monitored activities</li> <li>- H&amp;S Assurance Processes and management reviews HSE performance data (including discussion around 2021 fatalities)</li> <li>- Findings and actions from the ALCOA delegation visit.</li> <li>- Emergency Preparedness and Response</li> </ul>	<ul style="list-style-type: none"> <li>- ISOMETRIX: Implementation and Performance</li> <li>- Local Content Plan: Action Plan Implementation Update</li> <li>- HR role in LWC audits</li> <li>- Cultural Heritage Management Plan: Action Plan Implementation Update</li> </ul>	<p>Continuation of above</p> <p>Travel back to Kamsar</p>	<p>Travel back to Kamsar</p> <p>Join AQMP, water management, and dredging sessions</p>

Day 5. Friday 4<sup>th</sup> March

Time slot	Env	H&S	Social	Resettlement	Biodiversity
09.00 – 12.00	See Biodiversity session  Internal meetings/ preparation	Wrap up meetings (as necessary)  IESC Prep for close out.	Social team joins Biodiversity session for 5 year rehab plan discussion  IESC Prep for close out.	Wrap up meetings (as necessary)  IESC Prep for close-out	5-year Rehabilitation Plan and Landscape Level Plan (ESAP items 27 + 28).  IESC Prep for close-out
Lunch					
11.00 – 13.00	Close-out meeting				

## **APPENDIX 2 PHOTOLOG**



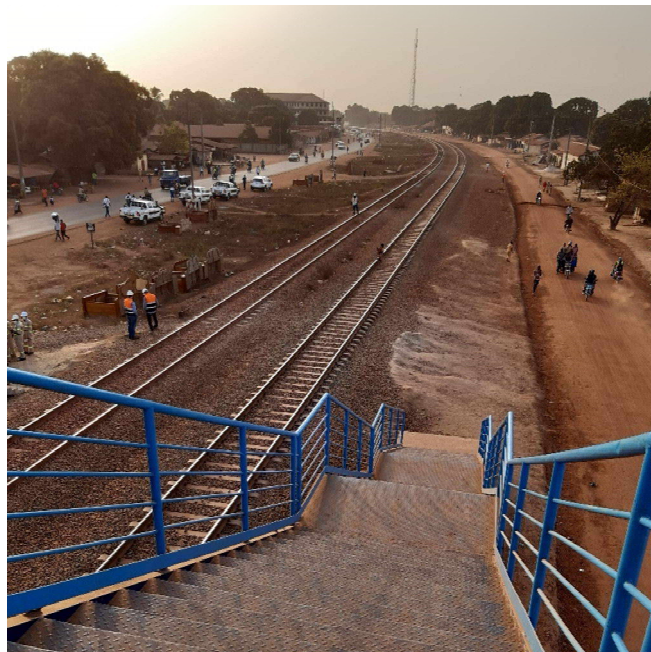
**Photo 1.** Small scale commercial activity with rail corridor, Kamsar



**Photo 2.** Uncontrolled waste alongside rail. Potential fire hazard and risk to CBG operations.



**Photo 3.** Fencing close to port with sections that allow passage



**Photo 4.** View from a newly constructed footbridge in Kamsar



**Photo 5.** Fence posts awaiting completion with beta fence



**Photo 6.** Level crossing manned by CBG.  
Note. Yellow klaxon to warn of approaching trains.





**Photo 7.** Earlier construction works for a footbridge at Kolaboui



**Photo 8.** Noise monitoring during blasting event, Fassaly Foutabhé



**Photo 9.** Dust plume resulting from nearby blasting event, Fassaly Foutabhé



**Photo 10.** Poor construction practice adjacent to dried up stream. Earthworks resulting in soil being moved into the dry stream



**Photo 11.** Newly installed water well, Fassaly Foutabhé



**Photo 12.** Retention basins intended to prevent sedimentation of a stream as a result of in mine site run off



**Photo 13.** Sampling bottles used for water quality analysis



**Photo 14.** Air quality monitoring equipment in Sangaredi equipment store



**Photo 15.** Sangaredi landfill with small fires



**Photo 16.** Railway crossing close to market manned by CBG, Kamsar. Poor separation between vehicles and pedestrians



**Photo 17.** Office facilities at Tora Bora waste facility – awaiting commissioning



**Photo 18.** Fuel storage in location used as a refuge for operators at the waste facility.

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**Photo 19.**



**Photo 20.** Security post at Tora Bora landfill

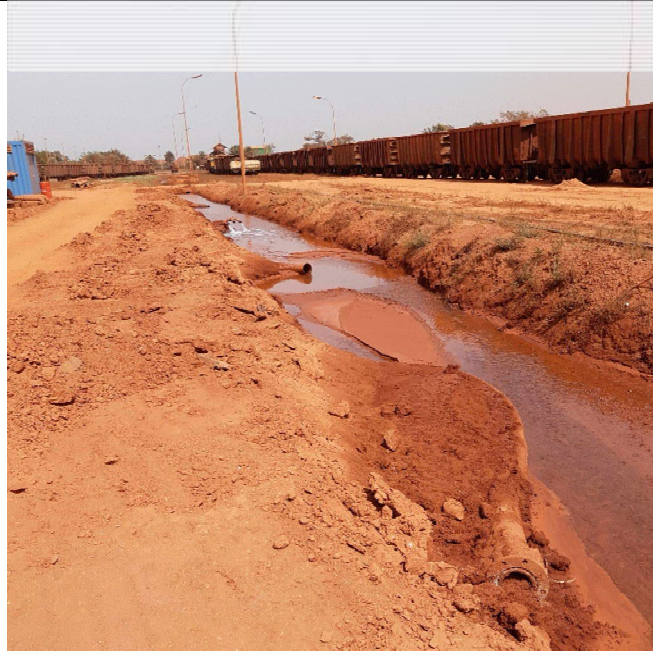


**Photo 21.** Tippler – rotating wagon emptying laterite into primary crusher



**Photo 22.** Evidence of fallen rocks. IESC understands no personnel are allowed access whilst tippler is operational





**Photo 23.** Discharge of sump water from primary crusher pit to a surface drainage channel



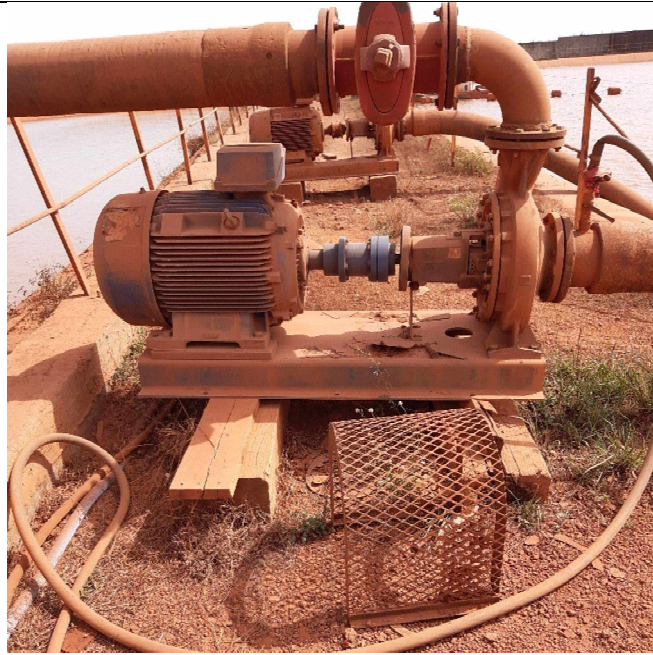
**Photo 24.** Heavily sediment laden discharge exiting CBG perimeter.



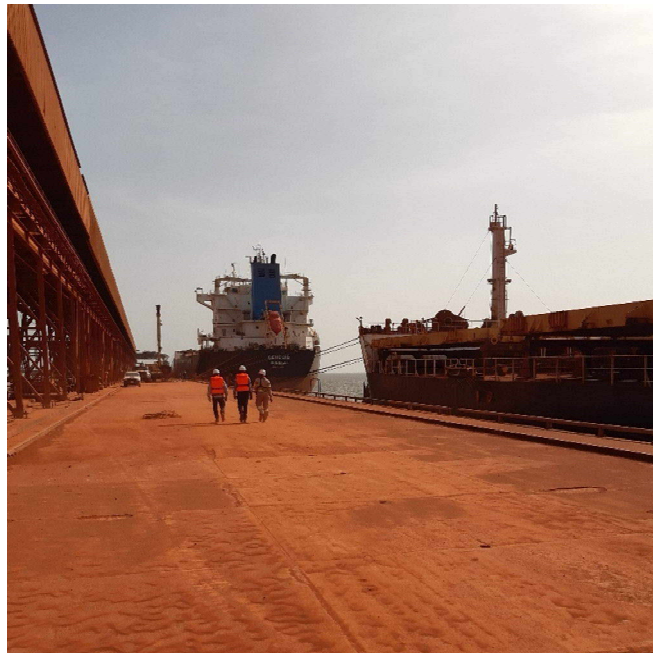
**Photo 25.** Accumulated dust beneath conveyors/moving machinery at Kamsar



**Photo 26.** Resuspension of dust in dry windy conditions



**Photo 27.** Unattended water pump with safety guard removed (placed on the ground)



**Photo 28.** CBG jetty with 2 vessels berthed



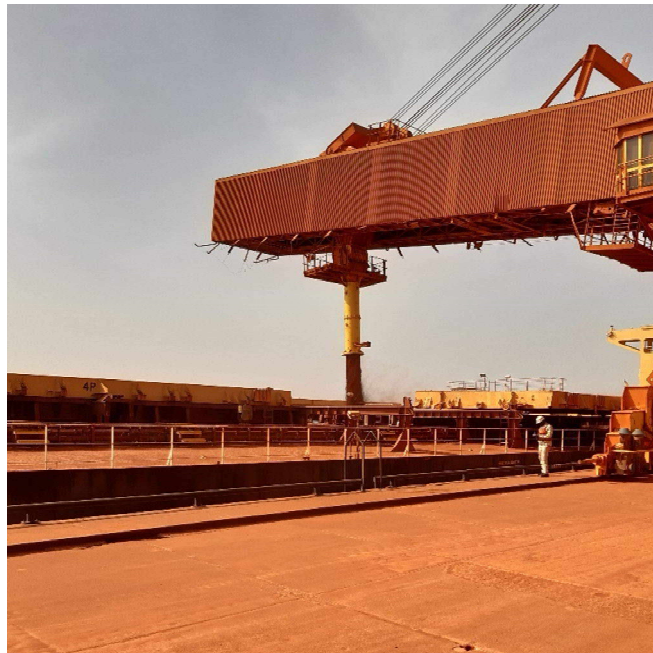
**Photo 29.** Poor maintenance of fuel hose on a vehicle resulting in loss of diesel on the jetty



**Photo 30.** Oil water separator – treated water



**Photo 31.** General view showing dryers and both dryer stacks (dryer 4 stack on the left)



**Photo 32.** Loading of ship

## **APPENDIX 3**

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

### Status of issues raised in the previous site visit report

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in March 2022)
Oct 2021_001	Management of Change	Progress has been made to address the findings of the March 2021 VSV Report, and CBG has a draft action plan in place to address poor adherence to the MoC procedure. However, CBG is in the early stages of implementing the remedial actions and material improvements have not been seen at the time of the October VSV.	All	<p>CBG to finalise the MoC Action Plan and roll out the measures therein as a matter of priority.</p> <p>The Owner of the Procedure/Action Plan and MoC Coordinator to be appointed with ultimate responsibility for full implementation of the requirements set out in the MoC Procedure.</p> <p>The Action Plan should be shared with the IESC and Policy Lenders.</p>	Moderate	<b>Superseded</b> (see March 2022-005)
Oct 2021_002	Contractor management and the Integrated Management System	<p>Although the CMP has been in place since January 2019, CBG has not yet undertaken all actions needed to implement the plan fully.</p> <p>CBG appointed, in June 2021, an HSE Coordinator with the remit of supporting the HSECQ team on implementing the IMS and the suite of E&amp;S Action Plans (as presented in the E&amp;S Management Plans). In addition, the HSECQ Department will appoint soon a CMP Coordinator.</p>	All	<p>The IESC supports current initiatives regarding CMP compliance and strengthening of the IMS, noting the CMP coordinator will be responsible for ensuring contractors comply with CBG's requirements.</p> <p>The IESC further stresses the importance of a comprehensive and targeted audit of contractors against the requirements of the CMP, including audit of both contractors' H&amp;S documentation (pre and post contract award) and actual safe working practices on the ground.</p>	High	<b>Open (in progress)</b>  CMP Coordinator has been appointed. Effectiveness of role to be further assessed in subsequent site visit.
Oct 2021_003	CR team recruitment	The appointment of the Database specialist by the end of Q3 2022 and the expectation that IsoMetrix will be functioning fully by end of Q1 2022 means	All	Consider bringing forward the appointment of Database specialist so that the gap between the Database specialist being employed and a fully functioning IsoMetrix	Moderate	<b>Open</b>

		that there will be a six-month period when IsoMetrix will not be used to its full potential.		is reduced to the maximum extent possible.		(database specialist not appointed at time of March 2022 site visit)
Oct 2021_004	CR team: resources	The CAO process requires periodic high-intensity support on the part of the CR Manager and CR Surintendant and is likely to continue for the for the next six months (possibly longer).	All	Consider renewal of the ACORN International contract, if it seems likely that the CAO process will extend beyond July 2022	<b>Minor</b>	<b>Closed</b> (contract extended)
Oct 2021_005	CR team: resources	Acquisition of certain of digital equipment items (hardware and software) were delayed in 2021 year-to-date. Others were 'on track' as of end September 2021	All	Ensure that there are no procurement delays affecting the acquisition of these 'on track' items	<b>Minor</b>	<b>Closed</b>
Oct 2021_006	CR team: training	Several training events have been delayed by potentially up to one year and dates for these events have not been agreed with the provider. There is an opportunity for the CR Manager to consider actions that could be adopted to improve training outcomes while minimizing disruption to workloads.	All	Consider: <ul style="list-style-type: none"> <li>• Planning and organizing staff time so that there is minimum disruption to workloads while fulfilling training commitments. Possible options include careful selection of personnel to be attending specific training events, scheduling events so that one event immediately follows another ('back-to-back' sequencing) and providing incentives for some training to be undertaken outside standard working hours;</li> <li>• Applying the 'train the trainer' model where only one or two staff members attend a training event and then they train their colleagues on the key principles and/or practices in shorter subsequent training events; and</li> </ul>	<b>Moderate</b>	<b>Open/Ongoing</b>



				In the context of future training needs for the period 2023 – 2024; selecting fewer key training topics/events (perhaps a maximum of 10 topics/events)		
Oct 2021_007	NoCo Exploration	Contractors are likely to require temporary rights to use/occupy land for facilities such as, but not limited to, fly-camps and laydown areas.	Exploration	Ensure that contractors acquire agreements, with all affected land rights-holders, for use and/or occupancy of land for facilities such as, but not limited to, fly camps and temporary laydown areas, in a PS 5-compliant manner	<b>Moderate</b>	<b>Closed</b> (IESC understands LDP process will apply to all activities NoCo)
Oct 2021_008	Revision of Environmental Management Plans including the Contractor Management Plan (and Procurement)	The planned revision of certain Environmental Management Plans is overdue and implementation of actions specified within Action Plans are behind the original 2019 schedules.  Reliance on the import of specialist equipment, exacerbated by a slow procurement process, has delayed the execution of E&S actions specified in the Management Plans.  The recommendation made during the March 2021 VSV remain valid.	All	CBG should conduct a review of its procurement process in order to identify opportunities to expedite procurement of goods and services across all E&S disciplines.  See also March 2021_007.	<b>Moderate</b>	<b>Open</b>
Oct 2021_009	Female participation in stakeholder meetings	Since 2020, CBG has implemented actions to increase female attendance and participation in community-focused meetings. To date, success has been limited though insufficient time has passed to provide a definite conclusion.	All	Consider implementing one or more of the following options: <ul style="list-style-type: none"> <li>Identifying informal/formal female associations in the villages such as womens’ farming/gardening groups and then organizing meetings;</li> <li>Organizing meetings in the fields where groups of women may be working together (in rest periods and not interfering with work regimes); and</li> </ul>	<b>Moderate</b>	<b>Open</b> (open on the basis that female participation remained low immediately prior to the March 2022 site visit)

				Random walks in villages and to/from agricultural areas to engage in informal conversations with individuals or small groups of women		
Oct 2021_010	Grievance mechanism	The community grievance mechanism is not functioning effectively (low annual number of grievances recorded for past five years)	All	The community grievance mechanism to be reviewed and revised, as appropriate, within the context of preparation of the SEP 2022-2025.	<b>High</b>	<b>Open</b> (status unchanged until SEP 2022-25 sign off by IESC)
Oct 2021_011	Grievance mechanism	Current planned training on the grievance mechanism is expected to occur in Q3 and Q4 of 2021. These dates are not aligned with the dates for finalization and dissemination of the SEP 2022 -2025	All	Enter into discussions with IFC Advisory to re-schedule the training 'Management of Grievance Mechanism' so that it is delivered at dates soon after the revised grievance mechanism is finalized and disseminated	<b>Moderate</b>	<b>Open</b>
Oct 2021_012	Dredging	The 2021 dredging campaign did not strictly adhere to certain actions set out in the Dredge Management Plan. In particular, deficiencies were observed in terms of: <ul style="list-style-type: none"> <li>- characterization of sediment from the dredging area and disposal area;</li> <li>- characterization of the benthic fauna from the dredging area and disposal area; and</li> <li>- underwater noise monitoring.</li> </ul> The IESC understands new contracts with external laboratories and an ongoing marine survey will allow the deficiencies to be addressed in time for any further dredging campaigns.	Operations	Stricter adherence with all applicable the requirements of the DMP is required in order to confirm impacts from dredging are known and minimised. Specifically: <ul style="list-style-type: none"> <li>- characterization of sediment from the dredging area and disposal area;</li> <li>- characterization of the benthic fauna from the dredging area and disposal area; and</li> <li>- underwater noise monitoring.</li> </ul> The DMP to be reviewed in line with the periodic management plan review cycle ahead of the next dredging campaign.	<b>Moderate Low</b> (re-categorised on the basis of work in progress.	<b>Open</b> (keep open until 2022 dredging campaign complete/results of surveys available)
Oct 2021_013	Land Rehabilitation and Relinquishment	CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and	Operations and	Work to be initiated immediately to formalize CBG's current practice, for managing mined land rehabilitation and	<b>Moderate</b>	<b>Open</b>

		relinquishment issues, despite the Mine Rehabilitation and Conceptual Closure Plan (MRCCP) presenting priority actions to begin by end 2018 (with one to be completed by end 2018)	Decommissioning	relinquishment, into a written procedure which includes not only key actions and responsibilities, but also standardized documents, to be signed by all parties, which record agreements reached/actions completed. This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP, relevant to mined land rehabilitation and relinquishment		
Oct 2021_014	H&S Performance	Three worker fatalities have occurred in 2021 compared to zero in 2020 and 2019.	All	<p>The IESC understands the events leading to each of these avoidable fatalities and understands that the breach of H&amp;S rules was a significant contributory factor. A detailed review of H&amp;S practices and performances should be undertaken by an IESC H&amp;S specialist during the next site visit. The review shall examine adequacy of training programmes, procedures, the influence of hierarchy (related to stop work authority), implementation of procedures and 'on the ground' practices across CBG operations and activities (including Contractors' behaviours) and other organisational factors in order to identify any opportunities for system and/or behavioural improvements.</p> <p>CBG should continue with detailed investigation of the three incidents to identify: i) the reasons why health and safety rules have been breached and opportunities to eliminate the occurrence of similar breaches in the future and ii) opportunities to improve the H&amp;S Management System/Procedures.</p>	<b>High</b>	<b>Superseded</b> (by detailing OHS findings presented in this report)

				CBG should also further promote/incentivise the use of the Stop Work Authority and consider mechanisms to encourage the use of the Stop Work Authority. For example, consideration of mobile Apps that are now available.		
Oct 2021_015	Dissemination of the HR Manual, WGM and Code of Ethics	Actions have been taken to disseminate these three documents to employees and contractors, but dissemination is not complete.	All	Accelerate the process of dissemination to contractors by identifying the contractors on site (those that fall into the definition of a contractor as presented in PS2). Subsequently, CBG should send each contractor a standard covering email (with the three documents attached), explaining the role of each document with CBG’s expectation that the contractor will comply with their requirements for the duration of its existing contract/s with CBG.	<b>Minor</b>	<b>Closed</b> (an ESAP item closed out by a review process separate to this Monitoring Report)
Oct 2021_016	Management of suppliers	The roll-out of LWC requirements does not yet extend to suppliers	All	Design of an action programme to apply the relevant PS2 requirements to CBG’s suppliers (those that fall into the definition of a contractor as presented in PS2)	<b>Moderate</b>	<b>Open</b>
Oct 2021_017	Integration of LWC requirements in bid evaluation and contractor management	Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are: <ul style="list-style-type: none"> <li>• Considered in the bid evaluations and contractor selection process, especially structured participation in the Evaluation Committee;</li> <li>• Presented in future reviews and potential changes to the ‘Minimum Requirements’ (and therefore included with RfPs); and</li> </ul>	All	CBG to ensure that: <ul style="list-style-type: none"> <li>• The bid evaluation process is amended so that the HR Department receives all bids in advance of Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee’s decision/s;</li> <li>• HR Department to designate a senior staff member to receive PS2 training to assist it fulfil its role in both the contractor selection</li> </ul>	<b>High</b>	<b>Open</b> (understood to be work in progress)

		Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.		<p>process and subsequent contractor management (latter issue to be examined in the next IESC site visit);</p> <ul style="list-style-type: none"> <li>All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan (with removal of LWC provisions from the Local Content Plan); and</li> </ul> <p>The HR Manual, WGM and Code of Ethics to be provided in all RFPs.</p>		
Oct 2021_018	Environmental Monitoring Programme	CBG has been unable to implement its Environmental Monitoring Programme in full for a number of reasons, including most notably a lack of an external laboratory for complex analyses and limited in house equipment/analytical capabilities. At the time of reporting, contracts with external laboratories were either signed or signature was imminent.	All	<p>Further effort is required to ensure full implementation of the EMoP and monitoring components of the environmental management plans, including:</p> <ul style="list-style-type: none"> <li><del>Finalisation of outstanding contracts with external laboratories;</del></li> <li>- Procurement of a data management system;</li> <li><del>Undertake a resourcing 'Needs Analysis' to determine current and future resource and training needs;</del> and</li> <li>- Disclosure of monitoring results to affected communities in an appropriate and meaningful format.</li> </ul>	<b>Moderate</b>	<p><b>Partially closed/superseded</b></p> <p>(items struck out are considered closed)</p>
Oct 2021_019	Air Quality – finalisation of AQMP	CBG was unable to complete wet season stack emission testing in 2021. Consequently, it is unable to meet the timeframes specified in the ESAP for finalisation of the AQMP.	All	<p>CBG to agree an extended timeframe for the finalisation of the AQMP with lenders. The agreement might include conditions and/or interim deliverables, noting that interim stack emission limits for the</p>	<b>High</b>	<p><b>Superseded</b></p> <p>(see March 2022_014)</p>

				<p>bauxite dryers could be derived using the 2021 dry season emissions data, Dryer 2-4 operating parameters and ambient air quality results due to be available in early 2022 following the relaunch of ambient air quality monitoring.</p> <p>The future wet season sampling should also include emissions sources that could not be sampled in 2021, including Dryer 1 and power generating units at the Sangarédi, Batafon, Filima and Kamsar power plants.</p>		
Oct 2021_020	Air quality – dust suppression	CBG has trailed chemical dust suppressants, however the outcome of the trails is unclear.	All	CBG to confirm the outcome of the trials/its use of chemical dust suppressants on haul roads. Where applicable, details of any chemical dust suppressants being used should be made available to the Lenders via the agreed Management of Change Procedure.	<b>Low</b>	<b>Open</b> (evaluation of dust suppressants ongoing)
Oct 2021_021	Air quality – commissioning of old power generating units	Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the original Kamsar central powerhouse by 2020. The IESC understands the old generators are no longer being used, however, they have not been decommissioned.	All	CBG should explain why the power generators have not been decommissioned to date.	<b>Low</b>	<b>Open</b> (decision to decommission generators is under evaluation, although CBG confirmed no intention to re-start these units)
Oct 2021_022	Water quality - Oil/water separator	Despite a number of successful interventions, oil concentrations in treated effluent from the oil water separator located at the Kamsar tank farm continue to consistently exceed the applicable IFC standard.	All	A rapid intervention plan to achieve compliance in the shortest timeframes possible should be presented to Policy Lenders and the IESC. This should include consideration readily available containerised/skid mounted oil treatment equipment that can be hired on a short-term lease until a permanent engineered solution is in place.	<b>High</b>	<b>Closed</b> (recommendations have been accepted by CBG and works are progressing to schedule)

				<p>In addition, CBG shall:</p> <ul style="list-style-type: none"> <li>provide its monthly oil in water monitoring results for the treated effluent to lenders in order to demonstrate short term actions are effective</li> <li>report progress on the interventions scheduled for Q4, 2021</li> </ul> <p>Any changes to the timeframes specified in the ESAP relating to the OWS must be agreed with Lenders.</p>		
Oct 2021_022	Water quality - mine effluents	A spring used by Fassaly Foutabhé community members appears to have been adversely affected by CBG's mining activities.	All	CBG should investigate the causes of the contamination and, if found to be a result of CBG's activities, implement corrective measures to restore the quality of the spring water or ensure a replacement water supply for Fassaly Foutabhé in the event the spring water quality cannot be restored.	<b>Moderate</b>	<b>Open</b> (investigation ongoing and evaluation of filter dykes under evaluation)
Oct 2021_023	Water Quality - Bypass of the Kamsar WWTP	The WMP Action Plan includes specific actions relating to use of an untreated effluent bypass at the Kamsar WWTP outside of emergency situations. Investigations have confirmed direct discharge of untreated sewage water to the estuary only occurs during high rainfall events because of rainwater ingress to the sewage drainage network.	All	CBG should expand its survey of the sewage drainage network to identify locations prone to rainwater ingress and repair elements prone to rainwater ingress. A flowmeter should be installed to monitor the frequency of discharge events and volume of untreated water discharged to the estuary. Monitoring should confirm no discharge of untreated sewage water during normal operating conditions.	<b>Minor</b>	<b>Open</b>
Oct 2021_024	N&V impacts	Review of noise and vibration management has identified the following issues:	All	Confirmation of the efficacy of measures put in place is required as follows: 1. Expedite receipt of ancillary equipment and initiate use of the	<b>Moderate</b>	<b>Partially Closed</b>

		<ol style="list-style-type: none"> <li>Noise monitoring has been hampered by broken and malfunctioning equipment/software.</li> <li>Monitoring at specific sensitive locations along the railway has not occurred.</li> <li>There has been repeated exceedances of airblast overpressure limits in 2020.</li> </ol>		<p><del>new noise meters at the earliest opportunity-</del></p> <ol style="list-style-type: none"> <li>Further monitoring is required at specific sensitive locations along the railway. Noise and vibration measurements should be taken at a setback distance from the railway line that is equivalent to that of the sensitive receptors.</li> <li>CBG should engage with potential affected residents at these locations to determine the level of disturbance currently caused.</li> </ol> <p>CBG should confirm through monitoring data that measures to meet airblast overpressure limits have been successful</p>		(items struck out are considered closed)
Oct 2021_025	Waste management	<p>Progress in the implementation of the waste management Action Plan continues with a significant number of actions no longer relevant or behind the original schedule specified in the action plan.</p> <p>Community attitudes towards CBG’s use of Bendougou have not been evaluated by the CBG CR Team. The level of risk of community objections/blockades, similar to those that occurred in the past, is therefore unknown.</p>	All	<p>As reported previously, the Waste Management Plan should be updated to reflect CBG’s current waste management strategy, including the potential use of Bendougou facility and longer-term strategy following end of the Tora Bora waste facility’s design life.</p> <p>Also, the CR team to engage with the affected community members prior transportation of wastes to Bendougou.</p>	<b>Moderate</b>	<b>Open</b>
Oct 2021_026	Hazardous materials management	<p>Radioactive lightning rods are present on CBG facilities. These are prone to decay and damage over time and therefore need to be carefully managed. Currently CBG’s plan for ultimate dismantling and disposal of these radioactive sources is undefined.</p>	All	<p>A longer-term solution for the safe dismantling and disposal of radioactive lightning rods is required as per action 4.18 of the HAZMAT Action Plan. The Waste Management Plan will also require update to include the disposal route(s) for this waste.</p>	<b>Minor</b>	<b>Open</b> (disposal plan scheduled for mid-late 2022)



Oct 2021_027	Energy efficiency/GHG emissions	CBG is refining its SOP for GHG emission monitoring and reporting.	All	IESC recommends that GHG emissions reporting data is broken down such that fuel use/GHG emission can be normalised (tonnes CO <sub>2</sub> /unit of bauxite produced) and attributed to the different users of the railway (under the MUOA)/consumption of electricity by communities in Kamsar and Sangarédi. The methodology for apportioning GHG emission to different users can be detailed in the revised SOP. Visiting vessels (e.g. dredgers) with their own fuel source should also be captured in the GHG emissions calculations.	<b>Minor</b>	<b>Open</b> (procedure schedule for June 2022)
Oct 2021_028	Recording of security incidents and community grievances	The IESC notes that several incidents, recorded in the security incident register are very similar to grievances; for example, two incidents relate to the effects of dust, generated by blasting and truck movements respectively, on nearby communities.	All	This observation should be brought to the attention of NTRospective to assist its work in redesigning the community Grievance Mechanism and in preparation of training materials for CBG staff involved in managing community-focused grievances.	<b>Minor</b>	<b>Closed</b> (NTRospective have been made aware and instructed to differentiate incidents and complaints appropriately)
Oct 2021_029	Community health and safety: Installation of passarelles and fences	Communities/local governments wish the following installation sequence to be followed; the passarelles to be open for public use before the fences are 'closed'.	Construction	Engineering supervision to focus closely upon ensuring that each contractor is aware of the sequencing of the passarelles/fences and that regular supervision checks are made to ensure that the sequence is being applied.	<b>Moderate</b>	<b>Closed</b> (current schedule will not allow for erection of fencing prior to completion of footbridges)
Oct 2021_030	Rail-related fatalities of community members	Recent increase in risk, in Kamsar, of rail-related fatalities of community members who have mental health problems.	All	Consider and identify, in conjunction with the operator of the treatment centre (traditional healer), feasible measures (both 'soft' and 'hard') aimed at reducing the risk of rail-related fatalities involving his patients and then consolidate the measures into an action plan to be	<b>High</b>	<b>Open</b> (IESC informed actions ongoing as of March 2022 IESC visit)

				implemented as soon as possible after the plan is agreed.		
Oct 2021_031	Fassaly Foutabhé school	The Fassaly Foutabhé school is still not yet staffed	Operations	Continue to liaise with “ <i>Inspection académique</i> ” (local education directorate) to ensure allocation of teachers to the school	<b>Moderate</b>	<b>Superseded</b> (See March 2022_030)
Oct 2021_032	Cumulative land impacts	Fassaly Foutabhé community has expressed concerns as to the long-term viability of the village in its current location	Operations	Prepare a long-term cumulative assessment of the future impact of mining activities on Fassaly Fouthabé and consult with the community on the findings and identify other ‘at risk’ communities and undertake similar cumulative impact assessments	<b>High</b>	<b>Superseded</b> (See March 2022_031)
Oct 2021_033	Hamdallaye and Fassaly Foutabhé grievances/ <i>doléances</i>	At the meeting of 3 August 2021, a wide range of issues, concerns and requests were raised by the community representatives many of which do not appear in the grievance and <i>doléance</i> registers	Operations	Issues/concerns/requests raised by participants should be logged within the grievance/ <i>doléance</i> management system so that they can be tracked and closed	<b>Moderate</b>	<b>HOLD</b>
Oct 2021_034	Hamdallaye Livelihood restoration	Previous recommendations to improve CECI’s work with respect to horticultural/market gardening activities ( <i>maraîchage</i> ) on rehabilitated land have not been implemented adequately	Operations	CBG to: - Strengthen CECI’s agronomic expertise; and Ensure, before inception of the dry season gardening period, that gardening group members are properly prepared to the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know how to do basic maintenance of drippers	<b>Moderate</b>	<b>Superseded</b> (see March 2022_032)
Oct 2021_035	Hamdallaye livelihood restoration	No recording of refusals to participate in LR activities	Operations	Document refusals to enrol in LR activities and keep them ‘on file’	<b>Minor</b>	<b>Superseded</b> (see March 2022_032)

Oct 2021_036	Livelihood restoration, all sites and plateaux	Implementation of LR activities is delayed and/or protracted. Need for stronger coordination	Operations	Consider appointing a strong implementation partner to coordinate all LR activities within one or several LRPs and tender LR implementation by LR activity rather than by plateau and procure one competent implementation partner for each broad activity (e. g. agriculture, IGAs, livestock, business development, etc.) and for all plateau	<b>High</b>	<b>Superseded</b> (See March 2022_032)
Oct 2021_037	Management of resettlement grievances	Only very few resettlement-related grievances appear to be logged and managed	Operations	Review the grievance management system, potentially separating resettlement- and compensation-related grievances from other community grievances, and to identify issues in the grievance logging process (specifically reviewing the role of inventory consultants, who appear not to log grievances during their field activities, as well as the role of CBG/contractor field staff)	<b>High</b>	<b>Closed</b>
Oct 2021_038	Monitoring (CRPF)	CBG has developed preliminary framework for monitoring. This framework is not consistent with the "Monitoring" chapters in the CRPF and the LRPs, and, also, it mostly focuses on progress indicators and not outcomes	Operations	Refine the monitoring system (indicators, methods, frequencies) on the basis presented in the CRPF and the baseline sections of the LRPs (taking into account the generic Policy Lender/IESC comments [18 October 2021]), on the Kankalaré RLRAP), (ii) distinguish progress from outcome (or impact) indicators and (iii) create a dedicated monitoring function within the team and resource it accordingly (at minimum, one full-time staff member)	<b>High</b>	<b>Open</b> (see also March 2022_035)
Oct 2021_039	Resettlement implementation capacity	The resettlement team remains understaffed despite the planned recruitment of a new staff member and the expansion of external support by the	Operations	Create operations and monitoring/evaluation posts within the resettlement team and make appointments as a priority.	<b>High</b>	<b>Superseded</b> (see March 2022_035)

		end of 2022. Also, the contract for the Resettlement Specialist was not renewed		Seek to appoint females to the team.		
Oct 2021_040	Resettlement implementation capacity	Procurement of required goods and services is not meeting resettlement needs cost-effectively and delivery of assistance to affected individuals, households and communities is delayed	Operations	HSECQ and Procurement and Logistics departments to establish a small working group to adapt the current procurement procedure by creating i) a means of accelerating resettlement-related requirements and ii) designing a 'fast track' route for high priority requests	High	Open
Oct 2021_041	BAP Implementation	In the IESC's March VSV, concern was expressed about the delay in implementing BAP actions with a recommendation requiring regular updates to be provided via established communication channels, such as the bi-weekly E&S calls. These updates have not occurred.	All	Regular updates to occur, but less frequently than the bi-weekly calls; instead CBG to provide an update on 'BAP Action Implementation Status' in specified (by the IESC) E&S bi-weekly calls.  <del>In the interim, CBG is to prepare a Memo on the current status of BAP Action Implementation (post VSV note: memo received) with the first of the regular bi-weekly call updates to occur no later than 4 weeks after receipt of the Memo by the IESC/Lenders.</del>  Note: the action lies with the IESC to include periodic biodiversity updates in bi-weekly call agendas.	Minor	Open (unless struck out)
Oct 2021_042	Biodiversity Inspections	Sedimentation of watercourses identified on a CBG site (non-conformity) and on a COBAD Road site	All	Provide evidence of the CBG's best efforts to persuade COBAD to address the sedimentation of a watercourse arising from the COBAD Road.	Minor	Open
March 2021_005	NoCo Exploration	Community consultations occur after the E&S Rapid Appraisal stage. The draft Compensation and Resettlement Policy	PS1	One round of community consultations to be implemented as part of the E&S Rapid Appraisal stage, at a time which CBG	Moderate	Open (Details of the studies to be undertaken for NoCo

		Framework shows that community consultations occur prior to impact mitigation measures being defined.		considers most appropriate in the local context.		feasibility not yet available)
March 2021_006	NoCo Exploration	The exploration campaign affects a relatively large area and application of the LDP process to each annual drilling campaign means that the cumulative impact of the three drilling campaigns in all three plateaux over a three-year period is not factor in drilling campaign decision-making for each LDP.	PS1	Undertake a rapid cumulative E&S assessment of the exploration campaign, as if it were a single project, prior to the first E&S rapid impact appraisal. This cumulative assessment to focus on identifying and evaluating the key risks/mitigation measures to inform the individual LDP-level E&S rapid impact appraisals.	High	<b>Open</b> (Details of the studies to be undertaken for NoCo feasibility not yet available)
March 2021_008	Social Management Plans	These Plans were approved in early 2019 and have a 2-year review cycle (except for the Local Content Plan which is to be reviewed, "...as appropriate"). Given the challenges that have emerged in implementing the actions; these reviews provide an opportune moment for a comprehensive evaluation of the continuing relevance of all actions, especially, those actions that are continuous or on-going.	PS1	Unamended Plans to are reviewed and updated in line with the 2-year review cycle. In this context, the CR team to evaluate and amend the Plan actions and timescales, as necessary, considering both the results to date from implementing the existing actions and, also, emerging issues that necessitate adding new actions. The amended Plans /Action Plans must identify priority time-critical actions.	Moderate	<b>Open</b>
March 2021_010	Female submission of grievances	Grievances appear to be submitted exclusively by males.	PS1	As part of its efforts to increase female participation in stakeholder engagement, it is recommended that CBG considers ways in which women can be encouraged to submit grievances directly and not only via male relatives or male community members.	Minor	<b>Open</b> (CBG continues to 'test' options to increase female participation)
March 2021_011	Communications Plan for 2021	CBG's Communications Plan for 2021 does not include recent important HR documents in its employee 'explanation' actions.	PS1	The actions presented under 'Internal - Operational Excellence', concerning HR documents, should be amended to show the current new key HR documents and not only older, though still current documents.	Moderate	<b>HOLD</b> (The Communications Plan for 2022 has not been approved internally. It is planned to review it

						during the next site visit in Q1 2022.
March 2021_012	Communications Plan for 2021	CBG’s Communications Plan 2021 does not include a ‘procedure’ for managing external communications as required by PS1 (para. 34).	PS1	CBG to design a procedure for managing external communications and then inserts it into the Plan ready for implementation in 2022.	Minor	<b>Open</b> (The Communications Plan for 2022 has not been approved internally. It is planned to review it during the next site visit in Q1 2022.)
March 2021_018	Emergency Response Planning	CBG’s current ERP does not recognise interaction with certain third parties, including GAC.	PS1	The ERP to be revised in recognition of third parties involved/impacted by CBG’s emergency response planning. This will include: <ul style="list-style-type: none"> <li>communications protocols, and</li> <li>in the case of oil spills (and other scenarios as applicable), the sharing of response resources.</li> </ul>	Moderate	<b>Closed</b> (following amendments made to an updated ERP)
March 2021_020	Reporting of COVID-19 cases	To date, surprisingly, no contractors have reported COVID-19 cases despite mandatory reporting of cases to CBG being required.	PS2	CBG to confirm that zero infections among contracted workers is correct and at the same time reiterate, to contractors, CBG’s expectation for immediate reporting of any cases that occur.	NA	<b>Closed</b> (reporting of contractors cases included)
March 2021_022	Integration of LWC requirements in bid evaluation and contractor management	Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are: <ul style="list-style-type: none"> <li>Considered in the bid evaluations and contractor selection process, especially structured participation in the Evaluation Committee;</li> <li>Presented in future reviews and potential changes to the</li> </ul>	PS2	CBG to ensure that: <ul style="list-style-type: none"> <li>The bid evaluation process is amended so that the HR Department receives all bids in advance of Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee’s decision/s;</li> <li>HR Department to designate a senior staff member to receive PS2</li> </ul>	High	<b>Open</b> (CBG reports that these recommendations will be addressed in work to be done to strengthen contractor management in 2022)

		<p>'Minimum Requirements' (and therefore included with RfPs); and Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.</p>		<p>training to assist it fulfil its role in both the contractor selection process and subsequent contractor management (latter issue to be examined in the next IESC site visit);</p> <ul style="list-style-type: none"> <li>All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan (with removal of LWC provisions from the Local Content Plan); and</li> </ul> <p>The HR Manual, WGM and Code of Ethics to be provided in all RfPs.</p>		
March 2021_027	N&V impacts – rural areas adjacent to railway	<p>To date CBG has not specified feasible mitigation measures that could be implemented in the event noise standards are exceeded following the increase in ore transported by rail.</p> <p>A final solution could involve resettlement of affected parties. CBG should ensure alternative mitigation measures are identified to avoid resettlement.</p>	PS3	<p>The IESC recommends the following actions are completed:</p> <ul style="list-style-type: none"> <li><del>Confirmation of the location of sensitive rural receptors and distances from the railway line;</del></li> <li>Establishment of a robust baseline N&amp;V data set (before train numbers further increase); and</li> </ul> <p>Identification of site-specific feasible mitigation measures in the event they should be needed i.e. availability of space and attitude of potentially affected parties to barriers/other measures). This is likely to be limited to installation of noise barriers and as such will need the involvement of the CR team in community consultations.</p>	High	<p><b>Open</b> (unless struck out)</p>
March 2021_034	Hamdallaye resettlement	<p>Some infrastructure works remain to be completed (e. g. drainage).</p>	Operations	<p>Complete the outstanding infrastructure works prior to onset of the 2021 rainy season.</p>	Minor	<p><b>Open</b> (some drainage issues remain)</p>

March 2021_035	Fassaly Foutabhé	The school is not yet staffed.	Operations	Continue to liaise with “ <i>Inspection académique</i> ” (local education directorate) to ensure allocation of teachers.	Moderate	<b>Superseded</b> (see March 2022_030)
March 2021_036	Hamdallaye livelihood restoration	Crops have been affected by pests. The benefit of the 2-year fallow period on the 56 Ha is questionable if no other measures apart from provision of topsoil are taken to improve fertility.	Operations	Ensure that CECI mobilizes appropriate agronomy expertise and consider alternative crops with better resilience to pests and mixed crops and consider use of phosphorus and potassium fertilizers, as well as “green fertilizers”) to enhance the fallow period.	Moderate	<b>Open</b>
March 2021_037	Hamdallaye livelihood restoration	The drip irrigation system is complex and entails strong collective management and maintenance capabilities.	Operations	Make sure ‘gardening’ IGA members are properly prepared for the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know enough to do basic maintenance of drippers.	Minor	<b>Superseded</b> (see March 2022_032)
March 2021_038	Hamdallaye livelihood restoration	28% of Hamdallaye residents have not enrolled in any of the livelihood restoration activities.	Operations	Document refusals to enroll and allow people that did not enrol to join later if they change their mind, to avoid issues at the completion audit stage.	Minor	<b>Superseded</b> (see Oct 2021_035)
March 2021_039	Livelihood restoration	CBG incurs transaction costs arising from LRP preparation and implementation being linked to mining of individual plateaux. Six LRPs will be implemented in 2021 each potentially with different implementing partners with separate contracts, undertaking the same activities at the same time with PAPs belonging to neighbouring communities (or sometimes the same community as is the case for Parawi and Hamdallaye).	Operations	Consider grouping LRPs by time-period for implementation, rather than by plateau, to reduce transaction costs.	Moderate	<b>Superseded</b> (recommendation not accepted by CBG)



March 2021_040	MUOA LRP	Livelihood restoration activities are planned to start in September 2021. This date is of concern as the MUOA LRP was finalized in September 2020 resulting in a period of almost one year before livelihood restoration measures will be implemented for approximately 400 PAPs.	Operations	CBG to expedite appointment of an implementing partner.	Moderate	<b>Superseded</b> (see Section 9.3.3 of this report)
March 2021_045	Resettlement resources and capabilities	Gender imbalance in resettlement team.	Operations	Seek to reach a better gender balance in the resettlement team.	Minor	<b>Superseded</b> (see March 2022_035)
March 2021_050	Five Year Mine Rehabilitation Plan	The plan contains insufficient information on measures to address limited topsoil for rehabilitation and how the approaches to addressing rehabilitation are communicated to local communities.	PS6	Updated Plan to contain information on the various approaches CBG might take to rehabilitate areas when topsoil is limited and how CBG will liaise with local communities to communicate its approach for rehabilitation and the need to balance use of rehabilitated land for agriculture with the creation of natural habitat.	Moderate	<b>Closed</b>
July 2020_002	HSECQ resources – recruitment and succession planning	There has been a relatively high turnover of senior staff with posts remaining vacant for several months at a time. The overall result has been detrimental to CBG's management of HSECQ matters.	PS1	The recruitment process and role of the parties responsible for recruitment and succession planning to be reviewed, to try to avoid periods in which key HSECQ positions remain vacant thereby improving continuity of the team and knowledge base. Measures to recruit and retain key staff, including alternative conditions of employment to be considered.	Moderate	<b>Closed</b> (closed on the basis that retention of staff is not atypical and resourcing plan is in place)
July 2020_005	CR and Resettlement Teams' staffing levels and access	The CR and Resettlement teams will remain under considerable pressure to maintain effective delivery of their responsibilities plus any new functions that may be allocated to them. With the completion of Phase 1 of the Expansion	PS1	Review the staffing situation, irrespective of planned addition of any new staff members by end 2020, in the context of the expected role/workload for the CR and Resettlement teams and the role and size of similar departments in other mining companies in	High	<b>Closed</b> (Time-bound Recruitment Plan [up to 31 December 2023 (Version 2)] has been finalised)

	to external assistance	Project, the IESC considers that it is appropriate to restate and update its main staffing recommendation, presented in its July 2019 Monitoring Report.		Guinea and other West African countries (benchmarking).  Following this review the HSECQ department will prepare and implement a Time-bound Recruitment Plan (2021 to 2023) to achieve the required complement of staff and 'on-call' consultancy resources (perhaps via a framework contract with a multi-disciplinary consultancy or framework contracts with several specialist consultancies), Finance needed to ensure implementation of these actions to be included into the appropriate budget.		
July 2020_007	Stakeholder Engagement Plan (SEP)	The SEP is dated 2016 and is time-bound (however, with a flexible date for revision/updating, " <i>The SEP will be updated subsequent to completion of the phase 2 ESIA</i> "). In line with the SEP expectation, it was revised to incorporate the MUOA Project in June 2020. Given that the SEP has been in force for almost 5 years, it is now necessary for an overall SEP revision/update to occur.	PS1	Revise/update and re-issue the SEP. This revised/updated SEP should be clearly time-bound (January 2022 to December 2025) and disclosed publicly.  The current 2019-2020 Action Plan to be extended until the 31 December 2021 to cover the period before the revised/updated SEP is operational. This extended Action Plan will be aligned with the current version of the SEP (as amended to incorporate the MUOA Project).	Moderate	<b>Open</b>  (A first draft of the SEP (2022-2025) was issued on 02 December and is under PL/IESC review.  <b>Closed</b>  The current 2019-2020 Action Plan was extended until the 31 December 2021.)
July 2020_008	Community Grievances	Continuing lengthy delays in closing out certain grievances	PS1	Strengthen the ability of the HSECQ Monthly Committee Meeting to act promptly to ensure that there are no institutional 'barriers' to speedy actions in terms of: i) recognising the legitimacy of grievances; and then ii) implementing the actions to close them as quickly as possible.	Moderate	<b>Closed</b>  (general improvement in closure timeframes – will be a topic of ongoing monitoring by IESC)

2020_019	Water quality – WWTP at Sangarédi	The installation of the UV treatment plant at the Sangarédi WWTP remains an outstanding issue despite the plant being in-country.	PS3	Priority should be given to completion of this installation to prevent further delay, pending the lifting of current COVID-19 travel restrictions.	Moderate	<b>Closed</b> (UV plant commissioned)
July 2020_026	Community H&S risks	The rail-related risk to community members has increased over the past two years and will continue to increase until end 2022.	PS4	The Rail Safety Management Plan (and Action Plan) to be revised and updated as a priority and every effort made to ensure that the current schedule for installation of crossings such as footbridges does not experience delays.	Moderate	<b>Superseded</b> (this report details status of fencing and footbridges in March 2022)
July 2020_028	Hamdallaye resettlement – resettlement site	Outstanding works (runoff drainage, access roads to agricultural land, teachers' houses, plantations near community facilities, etc...) need to be completed	PS5	Expedite procurement and execution of the few outstanding works (runoff drainage, access roads to agricultural land, teachers' houses, plantations near community facilities, etc...). Works to be completed by end of 2020.	Moderate	<b>Closed</b> (Pending remaining drainage works. See section 9.1.2)
July 2020_035	REB: landscape scale initiatives	The CBG biodiversity team has an opportunity to develop and lead best practice in mine rehabilitation through its current presidency of REB and activities on site.	PS6	The biodiversity team should continue to be supported by management with sufficient resources to maximise the REB opportunities. Within CBG, management should ensure an integrated approach to rehabilitation between the Biodiversity and CR teams.  CBG should develop a work plan for its presidency of REB, including resource and cost information.  The IESC notes that IFC is interested in attending a REB meeting as an observer if possible.	Moderate	<b>Closed</b> (on the basis it is an ongoing task)
July 2019_004	Security management	The HSEC briefing given to the IESC and Lenders did not include information about site evacuation in case of a major security issue.	All / PS4	CBG should strengthen its induction procedure(s) to ensure visitors are aware of the procedure to follow in case of a site evacuation.	Moderate	<b>Open</b> (site evacuation was not communicated during site visit safety briefing)

July 2019_015	Waste recycling	To date there has been no representative from the HSEC team participating in the recycling committee.	Operations / PS3	The HSEC is seeking representation from its team. The IESC strongly supports this measure.	Minor	<b>Closed</b> (IESC informed that waste recycling committee is concerned only with sale of scrap wood and metal, thus little value in participation of HSECQ representative)
July 2019_018	Security provision by contractors	Currently, Sogea Satom (one of the MUA contractors), employs three security providers. The guards are not formally trained. Most guards come from the local communities and are not armed. This lack of training poses a risk to CBG.	All / PS4	CBG to review its supervision with respect to contractors and the hiring and deployment security providers to ensure that contractors' practice is aligned with CBG's own practice with respect to hiring and deployment of private security providers.	Minor	<b>Open</b> (Security guards are provided by SOTRAC (a TPE [small or medium-sized enterprise] established by CBG to provide speciality services to CBG) and IESC understands that they undergo the same training as other security providers. To be confirmed in the next site visit in Q1 2022).
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	<b>Closed</b> (addressed via separate ESAP review process - The LRP is being prepared and is under PL/IESC review).
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	<b>Open</b> (Revised Compensation and Resettlement Policy Framework is under review by Lenders/IESC but is not yet finalised).

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	<b>Open</b> (CBG is working with a specialist eDNA company to progress eDNA surveys and has completed surveys in 2021 and will continue 2022-2024. This action will be closed following receipt of the 2021 study report)
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	<b>Closed</b> (The width of a path is reduced in several places)
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	<b>Open</b> (HOLD – request latest version of audit and inspection procedure)
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	Minor	<b>Closed</b>

				need to elevate large volumes of fuel at height.		
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)	<b>Superseded</b> (issue captured in ESAP and addressed accordingly) The revised and updated Resettlement Policy Framework is currently under PL/IESC review)
Dec 2018_029	Boulléré/COBAD Road river crossings	Exposed riverbanks caused by excavation/construction works.	PS6	Rehabilitation efforts should continue, to ensure that silty run-off does not occur in the wet season, when further excavation/construction activities are scheduled as part of the restoration of riverbank profiles.	Moderate	<b>Closed</b>
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	<b>Open</b> (To be checked in next CBG/IESC/PLs Technical Resettlement Ccall or during next IESC site visit)
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	<b>Open</b>

<p>July 2017 _038</p>	<p>COBAD Road</p>	<p>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.</p>	<p>All</p>	<p>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.</p>	<p>High</p>	<p><b>Closed</b> (restoration work completed)</p>
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## **APPENDIX 4 STATUS OF ESAP ITEMS (AS OF MAY 2022)**



	<b><u>Theme</u></b>	<b><u>Required Action</u></b>	<b><u>Date</u></b>	<b><u>Indicator of Completion</u></b>	<b><u>Status</u></b>
<b>1</b>	Operation HSEC-MS	Develop a route map outlining major milestones (based upon actions, timeframes, and interim deliverables), to bring operations up to a level consistent with IFC Performance Standards.	10 Business days after receipt of comments from IESC/Policy Lenders.	Gap Analysis	Closed
		This route map will be informed by a 'stand-alone' gap analysis with respect to current systems and any additional items required for IFC compliance, and, also, recommendations arising from work done to implement the other ESAP actions	31/01/2022 (draft) 31/03/2022 (final)	Route Map	Closed
		Align HSEC MS for existing operations with HSEC MS for the Expansion Project and bring current operations up to a level consistent with the intent of the IFC Performance Standards	31/01/2024	Evidence of HSEC MS aligning with HS	Open Pending (due 2024)
<b>2</b>	E&S Reporting	Update and amend the structure of the Annual Monitoring Report template, considering Lender/IESC comments, in a form and substance satisfactory to Lenders	18/12/2020	Updated Annual Monitoring Report Template.	Closed
<b>3</b>	Human Resources	Finalize and then disseminate the updated Human Resources (HR) Manual to both direct employees and contractors.	30/10/2020	HR Manual and Workers' Grievance Mechanism	Closed
		Finalize and then disseminate the updated Workers' Grievance Mechanism to both direct employees and contractors.	30/11/2020	Evidence of dissemination to both direct employees and contractors	Closed
<b>4</b>	Human Resources	Finalize the Code of Ethics and Business Conduct	15/11/2020	Code of Ethics and Business Conduct.	Closed
		Disseminate the Code of Ethics and Business Conduct to both direct employees and contractors	18/12/2020	Evidence of dissemination to both direct employees and contractors.	Closed
<b>5</b>	Stakeholder Engagement	Extend and amend the Action Plan for Stakeholder Engagement 2019-2020 through to 31 December 2021 with contents changed, as appropriate, to ensure alignment with the MUOA-amended Stakeholder Engagement Plan.	29/01/2021	Extended Action Plan 2019-2021	Closed
		Disclose MUOA-amended Stakeholder Engagement Plan and amended Action Plan.	10 Business days following the approval of the amended SEP and Action Plan	Evidence of disclosure of MUOA-amended SEP and Action Plan.	Open

		Revise and update the Stakeholder Engagement Plan to reflect current/future needs and lessons learnt since 2016. The revised and updated Stakeholder Engagement Plan should focus on the period 2022 to 2025 and on improving alignment to IFC standards (for example, the stakeholder analysis/mapping section). The SEP to include a communication program to report back to communities about the results of water and air monitoring.	One month after receiving comments on the draft	SEP (2022 to 2025)	Open (undergoing IESC review)
		SEP (inclusive of all SEP Action Plans) to be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	10 Business days following the approval of the final SEP and Action Plan (2022 to 2025)	Evidence of SEP disclosure.	Open Pending approval by Lenders
6	HSECQ Resources	Employ a dedicated full-time Environment Manager. CV to be provided to Lenders for approval on a 'no objection basis' before confirmation of appointment followed by evidence of hiring.	30/11/2020	Evidence of Hiring.	Closed
7	HSECQ Resources	Prepare and implement a Time-bound Recruitment Plan (initially through to mid-2021 (Version 1) and subsequently up to 31 December 2023 (Version 2)) for the Community Relations and Resettlement sections to increase capacity for social risk management and to strengthen management of the grievance mechanism.	30/11/2020	Version 1 Recruitment Plan	Closed
		The Version 1 Plan will include job specifications/SoW for each position in these sections. The Plan will specify urgent hires, including expertise in the following: grievance mechanism implementation, resettlement, stakeholder engagement, livelihood restoration, and data management. Evidence of recruitment to positions to be provided to Lenders.	29/01/2021	Evidence of urgent hires	Closed
		The Version 1 Plan will present commitments to establish framework contract(s) with consultants for regular support in resettlement/livelihood restoration and data management. Scopes of Work for framework contracts to be submitted to Lenders.	30/03/2021	Scopes of Work for Framework Contract(s)	Closed
		The scope of work submission is to be followed by notification of signed contracts.	30/06/2021	Notification of signed contracts	Closed
		The Recruitment Plan will be updated in mid-2021 (Version 2) to cover the period through to end December 2023.	30/08/2021	Version 2 Recruitment Plan.	Closed
8	HSECQ Resources	Prepare and implement a Time-bound Capacity Development and Resource Acquisition Plan for 2020 to 2021 (Version 1) for the Community Relations and Resettlement sections, including resourcing for social risk management teams, purchase of equipment/resources (such as vehicles, GPS handsets, and data management software) and in situ/external training of staff members in use of acquired resources.	20/11/2020	Capacity Development and Resource Acquisition Plan for 2020-21 (Version 1).	Closed

		Prepare and implement a Time-bound Capacity Development and Resource Acquisition Plan for 2021 to 2024 (Version 2) for the Community Relations and Resettlement sections, including resourcing for social risk management teams, purchase of equipment/resources (such as vehicles, GPS handsets, and data management software) and in situ/external training of staff members in use of acquired resources.	30/08/2021	Capacity Development and Resource Acquisition Plan for 2021-24 (Version 2).	Closed (pending sign off by IESC)
9	Training on Social Matters	Prepare and implement a HSECQ training programme including training on social matters, such as, as a minimum, topics as communication tools, resettlement practices, stakeholder engagement, data management), and management of grievance mechanisms. The training will be aligned with IFC good practice and provided by a specialist external entity.	31/07/2021	Preparation of a social training programme.	Closed
10	Data Management System for Social Risks	Create a specification and complete establishment of a data management system to gather, record and track social-related aspects such as land take, socio-economic information, compensation payments, grievances, stakeholder engagement, compensation agreements, asset inventory.	30/11/2020	Specification for System.	Closed
		The system must allow analysis of trends and root causes with regards to social issues and grievances over time. To provide evidence of the completion of the installation process and performance testing.	29/01/2021	Evidence of completion of installation process and performance testing.	Open (pending further maintenance/ upgrade required)
11	Area of Influence - GAC Siding	Prepare a Memorandum providing clarification on the status of the 'GAC siding', the environmental and social sensitivities, and impacts and mitigation measures implemented to date/to be implemented by CBG. Any additional mitigation measures shall be incorporated within appropriate E&S management plans (save for those mitigation measures which fall under GAC's responsibility).	18/12/2020	The Memorandum	Closed
12	E&S Management Plans	Update the E&S management plans in sections 12a to 12j to include MUOA amendments.			
12a	E&S Management Plans	Create a Noise and Vibration Management draft of amended plan to reflect noise and vibration assessments reports to be undertaken which determine the incremental impacts from the MUOA Project and define mitigation measures.	15/04/2021	PDN with draft of amended Noise and Vibration Management Plan	Closed

		Update the Noise and Vibration Management Plan based on IESC/Policy Lenders feedback to reflect noise and vibration assessments reports to be undertaken which determine the incremental impacts from the MUOA Project and define mitigation measures.	30 Business days after IESC/Policy Lenders provide feedback on the draft plan	Final Noise and Vibration Management Plan.	Open
<b>12b</b>	E&S Management Plans	Water Management Plan draft.	31/01/2021	Final Water Management Plan	Closed
<b>12c</b>	E&S Management Plans	Updated Environmental Monitoring Programme	20 Business days after IESC/Policy Lenders sign off on Noise and Vibration Plan (Item 12a)	Updated Environmental Monitoring Programme	Open (pending finalisation of NVMP)
<b>12d</b>	E&S Management Plans	Local Content Plan	31/01/2021	Final Local Content Plan Signed off by IESC	Closed
<b>12e</b>	E&S Management Plans	Cultural Heritage Management Plan	N/A	Cultural Heritage Plan	Closed
<b>12f</b>	E&S Management Plans – Community Development Plan	Draft Community Development Plan. The Plan will include tailored information-sharing approaches and methodologies for disseminating the Plan to targeted communities.	16/06/2020	PDN with draft of amended Plan	Closed
		Review by external third-party consultant of this Community Development Plan. The review will focus on ensuring that CBG's community investment strategy is aligned with IFC best practice. Prepare Scope of Work	18/12/2020	After receiving the Consultant's Scope of Work.	Closed
		SoW for the review to be submitted to the consultant to be approved by Lenders on a 'no objection' basis.	1 Month from bid submission date	Approval on a 'no objection' basis.	Closed

		The Community Development Plan will be revised as necessary, following the review.	31/01/2022	Following the submission of the revised Community Development Plan.	Open
		The Community Development Plan will be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	10 business days after the IESC/Policy Lenders have approved the revised Community Development Plan	Evidence of disclosure	Open
<b>12g</b>	E&S Management Plans	Finalised Influx Management Plan.	15/03/2021	Final Influx Management Plan Signed off by IESC	Open (minor changes required)
<b>12h</b>	E&S Management Plans	Finalised Community Health and Safety Management Plan.	28/02/2021	Final Community Health and Safety Management Plan Signed off by IESC	Closed
<b>12i</b>	E&S Management Plans	Finalised Road and Rail Safety Management Plan.	30/04/2021	Final Road and Rail Safety Management Plan Signed off by IESC	Open (pending budget estimate)
<b>12j</b>	E&S Management Plans	Finalised Emergency Response Plan.	20/05/2021	Final Emergency Response Plan Signed off by IESC.	Open
<b>13</b>	E&S Management Plans	i) Prepare an interim Air Quality Management Plan (AQMP) in accordance with the Scope of Work (Ref. AIR QUALITY Scope of Work ver 3). The Interim AQMP will be informed by the 2019 emissions data for Dryers 1-3 (and other sources) and dispersion modelling. The Interim AQMP will also propose stack emission limits and measures necessary to meet proposed limits and will include information on the necessary financial budgets to achieve the requirements within. Proposed emission limits will be agreed with Policy Lenders and the IESC.	(Subject of a waiver – in progress)	Interim AQMP	See below

		Update the interim AQMP to include consideration of Dryer 4 emissions and additional sampling data collected for Dryers 1-3/other sources as applicable and in accordance with the Scope of Work to produce a Final AQMP.	(Subject of a waiver – in progress)	A Final AQMP.	Open (pending ability to undertake wet season stack emission monitoring)
<b>14</b>	Worker Demobilization	<p>Prepare</p> <p>i) Worker Demobilization Plans and</p> <p>ii) subsequent Demobilization Close-out Reports, for future demobilization events, focusing on issues such as planning and monitoring procedures used to manage demobilization with emphasis on the process(es) used to notify workers of key demobilization dates, make and record final payments to workers and to manage grievances received and the procedures leading to grievances being closed out.</p> <p>iii) Demobilisation requirements should be communicated to contractors via the CBG Contractor Management Plan which should be updated accordingly.</p>	29/01/2021	<p>i) Worker Demobilization Plan</p> <p>ii) Demobilization Close Out Report</p> <p>iii) Communication to Contractors</p>	Closed
<b>15</b>	Pollution Prevention	Repair/upgrade the oil water separator located at the tank farm to achieve compliance with the applicable project standards. Design to be agreed with IESC.	31/12/2022 (Subject of a waiver)	Design Agreed for Pollution Prevention Upgrade/Repair works completed	Open
<b>16</b>	Community Mobility and Livelihoods	Develop a Scope of Work for an external consultancy and a Request for Proposals issued.	15/11/2020	SoW agreed	Closed
		Commission a study and report to be conducted by a suitably qualified consultant, on the impacts on mobility and road traffic flows (in urban areas) due to increased train movement frequency, including livelihood impacts resulting from alterations to mobility/traffic flows.	24/02/2021	Study commissioned	Closed
		The study report to include recommended measures to mitigate adverse impacts.	30/09/2021	Draft Study	Closed
		Based on the results of the study, CBG shall seek to agree with the Policy Lenders on mitigation measures to be implemented by CBG.	30/10/2021	Signed off by IESC and Policy Lenders	Open

		CBG to seek the approval of the MUOA User's Committee in accordance with Section 22 of the MUOA to address mitigation measures that need to be implemented (as agreed pursuant to (iv) above), including the roles and responsibilities of each of the parties with respect to such implementation.	30/10/2021	Signed off by IESC and Policy Lenders	Open
17	Past Compensation Report	Finalize the Past Compensation Report (2010-2015), with recommendations to improve livelihoods of PAPs, which integrates comments provided by the IESC and Policy Lenders. The recommendations will form the basis of an Action Plan to be implemented. This Plan will be included in the final Report.	31/10/2020	Completion of the Past Compensation Report including the Action Plan.	Closed
		The Past Compensation Report, including the Action Plan, will be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	22/01/2021	Evidence of disclosure.	Closed
18	Compensation and Resettlement Policy Framework (CRPF)	Finalize CRPF considering Lenders/IESC comments.	30/06/2021	Final CRPF Produced.	Open
		Approved CRPF to be disclosed publicly in a form to be agreed between CBG and the Policy Lenders.	10 business days after the IESC/Policy Lenders have approved CRPF.	Evidence of CRPF disclosure.	Open
19	Kankalaré RAP+LRP	Finalize Kankalaré Resettlement Action Plan (including a Livelihood Restoration Plan). CBG to send a Notification (accompanied with an updated fieldwork schedule), to Lenders, as soon as COVID-19 restrictions are lifted in a manner that allows the required fieldwork to be implemented.	05/03/2021	RAP and LRP	Open (ongoing iterative review)
20	Kankalaré Infrastructure Measures Completion	Provide interim and final report with photographic evidence of the finalization of infrastructure provision/improvement measures in relation to the Kankalaré PAPs' host communities. The measures are road to Parawi village, Telebofi footbridge over the railway; fencing along railway for the stretch where the railway passes beside Telebofi village; and iron-removal devices for wells.	30/11/2020	Interim Report with photographic evidence.	Closed
			31/12/2021	Final Report confirming all works completed.	Closed

21	Post 2016 Resettlement Independent Review	CBG to support the commissioning and execution of a third-party independent review of all land acquisition processes initiated from 01/01/2016 through to effective date of the CRPF (see item 18) and adequacy of related documentation. A Scope of Work to be prepared and approved by Lenders. This independent review will result in a Report focusing on compliance of land acquisition processes against the requirements of the 2016 RPF and PS 5. The Report will identify non-compliances and include a time-bound corrective action plan with budget to cover implementation. CBG to complete implementation of the Corrective Action Plan.	31/01/2021	Budget Approval	Closed
			As per the time bound by the Corrective Action Plan	Completion of actions specified in Corrective Action Plan.	Open
22	Hamdallaye and Fassaly Foutabhé RAP	Prepare and implement a COVID-19 Plan for H2, 2020, with the key aim of ensuring that CECI resumes/increases activities, in agreement with the communities, as soon as possible while respecting governmental restrictions.	16/11/2020	COVID-19 Plan	Closed
23	Hamdallaye: Resettlement Housing and Infrastructure Repairs Action Plan	Prepare and implement a time-bound Action Plan for housing and infrastructure repairs and other additional works related to the Hamdallaye resettlement site.	30/11/2020	Action Plan	Closed
		Environmental Monitoring Programme to be amended to include sampling and analysis of Hamdallaye water supply. Analysis of data, and any corrective actions needed.	See Item 12c	Updated Environmental Monitoring Programme to include water sampling and analysis	Closed
		PAP satisfaction survey to be undertaken upon completion of repairs and works specified in the Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.	As per the time bound by the Corrective Action Plan	PAP Satisfaction Survey Results	Closed
24	Hamdallaye: Land Rehabilitation Action Plan	Prepare (i) and implement a time-bound Action Plan, with biodiversity inputs, to implement the soil rehabilitation programme as per CBG's report (RAP Hamdallaye & Fassaly Foutabhé: Project Status Report, 12 February 2020) including setting up a pilot field to build the capacity of the population on soil fertility management and finalizing the individual allocation of land (ii to iv) to the respective affected people as per the RAP. The Action Plan, also, to include specific rehabilitation measures for:	30/11/2020	A completed time-bound Action Plan.	Closed
		- the replacement crop-growing land (56 ha); - all land to be used for land-based livelihood restoration activities; and	29/01/2021	<b>Initial</b> evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed



		- land for household gardens and fruit/shade trees.	31/12/2021	<b>Interim</b> evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
		v) PAP satisfaction survey to be undertaken upon completion of measures specified in the Action Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.	30/09/2023	<b>Final</b> evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Open
			Following implementation of the Action Plan	PAP Satisfaction Survey Results	Open
<b>25a</b>	Economic Displacement (SoW, Plateau LRP)	Prepare and submit scopes of work with respect to the Livelihood Restoration Plan (LRP) in the remaining sections of 25a below.	15/11/2020	Scope of Work	Closed
		Provide confirmation that a Livelihood Restoration Plan (LRP) is being or will be prepared for PAPs and submitted prior to people being displaced in N'dangara, Kagneka and Parawi by proposed mining activities and haul roads. CBG agrees that no additional land take causing displacement in N'dangara, Kagneka and Parawi will occur until the LRP has been approved by Lenders.	31/08/2020	Receipt of Confirmation	Closed
		Draft LRP to be submitted for Lender/IESC review.	1 month after receiving lender comments.	Draft and Final LRPs posted by the GFA	Open
<b>25b</b>	Economic displacement (i) Thiapkhore LRP	i) Prepare and submit an LRP with respect to PAPs already impacted by displacement in Thiapikouré. This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	15/06/2021	Draft and Final LRP.	Open
	Contingency Blocks LRP (ii) IA for contingency blocks (iii) closed (iv)	ii) Prepare and submit an LRP for review and approval by the Lenders with respect to PAPs affected by land disturbance through the streamlined process (Bouroré 1a, 1b & Parawi 2a). This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	Draft 31/08/21 and then 1 month after receiving lender comments.	Draft and Final LRP.	Closed

		iii) As an interim measure, prepare and submit an impact assessment of the economic displacement, for Bouroré 1a, 1b & Parawi 2a, and identification of those PAPs that are most vulnerable and for which transitional support will be provided.	Draft 30/7/21 and then 1 month after receiving lender comments.	Draft and Final Impact Assessment.	Closed
		iv) Formal written commitment by CBG not to disturb land before any LRP is in place.	30/11/2020	Written Commitment	Closed
26	Biodiversity Action Plan	Develop a Biodiversity Action Plan (an update of Biodiversity Management System), including a Biodiversity Monitoring and Evaluation Plan, in alignment with revised Guidance Note 6 (to Performance Standard 6) including development of standard biodiversity metrics for no net loss (NNL)/net gain (NG) of biodiversity; update of estimates of significant residual effects and associated offset targets to considered following completion of the BMS review; presentation of interim targets for NNL/NG; and prioritization of on-site set aside.	22/04/2021	Finalised Biodiversity Action Plan.	Closed
		The BAP will be disclosed publicly, within 2 weeks of its completion, by CBG, in a form agreed between the Policy Lenders and CBG.	30/06/2021	Evidence of disclosure.	Closed
27	Rehabilitation - 5 Year Plan	Prepare a 5-year progressive rehabilitation plan, including resourcing of the biodiversity department, for full land restoration (budget and equipment) and staffing required.	05/06/2021	Final Rehabilitation - 5 Year Plan	Closed
28	Rehabilitation - Landscape Level Plan	Develop a landscape-level plan for the concession, building on the existing Plateau by Plateau (PbP) approach, that integrates community development and biodiversity objectives. The intent is to provide strategic guidance to location and focus of rehabilitation, community development, and on-site conservation activities. This plan will require collaboration with affected stakeholders including local governments, representatives of communities/civil society organisations and neighbouring mining companies.	30/04/2021	Agreed TOR for Landscape Plan	Closed
			2 months after approval of the TOR by Lenders	Consultant approved by Lenders.	Closed
		The completion of a final Landscape-Level Plan.	1 month following comments from Lenders	Final Rehabilitation - Landscape Level Plan	Open

<p><b>29</b></p>	<p>Halco E&amp;S Support</p>	<p>CBG to arrange, at the request of any Policy Lender, a call with all of the Halco board members, to be held no more frequently than once per calendar quarter, to discuss the progress of E&amp;S matters, including environmental and social governance matters, relating to the Project. All Lenders and the IESC will be invited to the call. The requesting Policy Lender shall provide a proposed agenda at the time of requesting the call.</p> <p>Calls will be quarterly as requested, to commence at the end of the first calendar quarter following the Effective Date.</p>	<p>30/11/2020</p>	<p>Written confirmation from the CEO of the Halco Board to the Policy Lenders that all Halco board members will participate in update calls to be held no more frequently than once per calendar quarter with the Lenders and IESC on environmental, social and governance matters relating to the Project as requested by Policy Lenders.</p>	<p>Closed</p>
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