

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 2 September 2016 (as amended and restated on 6 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

**October 2020**

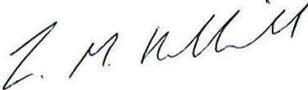
Project Number

**1620009030**

# **CBG BAUXITE MINE PHASE 1 EXPANSION & OPERATIONS ENVIRONMENTAL AND SOCIAL MONITORING REPORT - JULY 2020**

**CBG BAUXITE MINE PHASE 1 EXPANSION &  
OPERATIONS  
ENVIRONMENTAL AND SOCIAL MONITORING REPORT  
- JULY 2020**

Project No. **1620009030**  
Issue No. **01**  
Date **7/10/2020**  
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**Version Control Log**

Revision	Date	Made by	Checked by	Approved by	Description
Draft-01	25/08/2020	CH, RB, AF, FG	R Bisset	R Bisset	First draft to Client for comments
Final	7/10/2020	CH, RB, AF, FG	R Bisset	R Bisset	Final

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Key Project Documentation made available for Review

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Status of Issues Identified in Preceding Monitoring Visits

## ACRONYMS & ABBREVIATIONS

AMR	Annual Monitoring Report
BAP	Biodiversity Action Plan
BGEEE	Bureau Guinéen d'Études et d'Évaluation Environnementale
BMS	Biodiversity Management System
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
CBG	Compagnie des Bauxites de Guinée
CFB	Chemin de Fer de Boké
CFP	Chance Finds Procedure
CHMP	Cultural Heritage Management Plan
CR	Community Relations
CTA	Common Terms Agreement
DFC	US International Development Corporation
EEM	CBG's Environmental and Social (E&S) Consultants
EHS	Environmental, Health and Safety
EIG	Economic Interest Group
EPCM	Engineering, Procurement and Construction Management (Contractor = Fluor)
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
E&S	Environmental and Social
ESMP	Environmental and Social Management Plan
GIS	Geographic Information System
GoG	Government of Guinea
H&S	Health and Safety
HR	Human Resources
HSE	Health, Safety and Environment
HSE&S	Health, Safety, Environment & Social
HSECQ	Health, Safety, Environment, Communities and Quality
HSECQ MS	Health Safety Environment, Communities and Quality Management System
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
KBA	Key Biodiversity Area
KPI	Key Performance Indicator
LDP	Land Disturbance Permit
LTI	Loss Time Incident
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan

AMR	Annual Monitoring Report
LTIR	Lost Time Injury Rate
LWC	Labour and Working Conditions
MoC	Management of Change
MS	Management System
Mtpa	Million tonnes per annum
MUOA	Multi-User Agreement (regarding the railway capacity expansion project)
MS	Management System
NO	Nitrogen monoxide
NO <sub>2</sub>	Nitrogen dioxide
NO <sub>x</sub>	Oxides of nitrogen
NGO	Non-Governmental Organisation
O <sub>2</sub>	Oxygen
PAP	Project-Affected Person
PbP	Plateau-by-Plateau
PM	Particulate matter
PM <sub>10</sub>	Particulate matter 10 micrometres or less in diameter
PM <sub>2.5</sub>	Particulate matter 2.5 micrometres or less in diameter
PS	Performance Standard
Ramboll	The company fulfilling the role of IESC
RAP	Resettlement Action Plan
RN	Route Nationale
SCP	Streamlined Compensation Process
SEP	Stakeholder Engagement Plan
SMB	Société Minière de Boké - Winning Consortium Railway Guinea SAU
SO <sub>2</sub>	Sulphur dioxide
SOP	Standard Operating Procedure
tph	Tonnes per hour
TMP	Transitional Measures Plan (MUOA Project)
TRIR	Total Recordable Incident Rate
VSV	Virtual Site Visit
WBG	World Bank Group
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 'Project' or 'Expansion Project'), Guinea.

In fulfilling the role of Lenders' Independent Environmental and Social Consultant (IESC), Ramboll has a duty of care to the Lenders to the Project, including the Policy Lenders comprised of the International Finance Corporation (IFC), 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 monitoring visit each year during construction of the Phase 1 Expansion; however, a planned trip in early 2020 was postponed due to security concerns and then again after the onset of the COVID-19 pandemic. Following postponements of the monitoring trip and due to ongoing COVID-19 travel restrictions it was decided to undertake a virtual site visit (VSV).

The VSV was undertaken after receipt of the 2019 Annual Monitoring Report (AMR) and was based on a series of technical meetings undertaken over a two-week period during the weeks commencing 13<sup>th</sup> and 20<sup>th</sup> July 2020. The meetings were held via conference calls involving representatives from Ramboll, CBG and the Policy Lenders. Due to the nature of a VSV, additional emphasis was placed on the review of CBG's 2019 Annual Monitoring Report (AMR). To the extent possible, CBG presented photographic evidence and presentational material in support of its E&S performance and addition to supporting documents and other materials in response to information requests made by the IESC/Policy Lenders.

During the VSV, the following topics were investigated:

- The implementation of the Expansion Project's Environmental and Social Action Plan (ESAP);
- CBG's response to COVID-19 and the implications of COVID-19 for CBG's operations;
- The adequacy of the HSE&S Management System(s) (MS);
- The implementation of the suite of environmental and social (E&S) management plans intended to address applicable Project Standards, notably the IFC Performance Standards;
- Follow-up on those 'open' issues identified during previous site visits;
- CBG supervision/monitoring of the SMB railway<sup>1</sup> and the COBAD road;
- Occupational health and safety;
- Contractor management;
- Environmental management (air, water, waste, noise and vibration);
- Resource use and energy efficiency;
- Labour and working conditions including Phase 1 Expansion Project: Worker demobilisation;
- Stakeholder engagement and grievances;
- Transport and community health and safety;
- Security;
- Terrestrial Biodiversity, specifically;
  - Biodiversity Management System Update;
  - Plateau-by-Plateau (PbP) approach;

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<sup>1</sup> A Memorandum has been signed between SMB, CBG and BGEEE with respect to the 10 km of railway SMB is constructing in the CBG Concession area (South Cogon). Under this agreement, CBG's undertakes regular inspection reports, which focus upon SMB's performance against the applicable HSEC standards, which are then submitted to BGEEE. Only BGEEE has the right to enforce compliance. This tripartite arrangement is facing challenges, mostly relating to compliance, but also more recently, due to COVID-19 restrictions.

- Dredging and the Marine Environment;
- Biodiversity Inspections; and
- Land Rehabilitation;
- Resettlement issues, as follows:
  - Hamdallaye and Fassaly Foutabhé (the Hamdallaye village move, land rehabilitation and, for both communities, livelihood restoration);
  - Kankalaré RAP;
  - Future resettlement planning for the land acquisition in the Kagneka, Parawi-Koobi and Thiapikouré plateaux; and
  - The allegations presented in the 'IDI' report<sup>2</sup> concerning Hamdallaye (and Fassaly Foutabhé).

Prior to the VSV, the following specific elements of HSE&S performance were prioritised for review:

- Implementation of the suite of E&S management plans and resettlement-related topics;
- Issues related to labour and working conditions (including Phase 1 Expansion Project: Worker demobilisation); and
- Resettlement issues.

Other elements that were addressed during preceding visits, without significant concerns being raised, were not revisited on this occasion.

As indicated above the VSV focused upon broad range of HSE&S matters. CBG has a team of Health, Safety and Environment, Community Relations and Quality (HSECQ) specialists that are working to satisfy the requirements of the ESAP. Throughout the VSV, CBG cooperated fully and responded to all Ramboll's requests in relation to the monitoring effort.

A total of 41 findings (with accompanying recommendations) were identified during the VSV. Of these 8 are considered to have a 'High' significance; 24 are of 'Moderate' significance and the remainder are of 'Minor' significance. The High and Moderate findings relate to the timing/urgency/compliance of necessary actions, as listed below.

### High significance findings

1. *HSEC resources* - The post of Environment Manager has been vacant since January 2020. This vacancy is having a significant impact on the timely implementation of environmental action plans and affecting oversight and direction of the Environment Team with subsequent impacts on environmental performance. Recruitment of an experienced Environment Manager to be a priority and an appointment made at the earliest opportunity.
2. *Air quality – finalisation of the AQMP*. Preparation of an updated AQMP, inclusive of stack emission limits for bauxite dryers is behind schedule and dates agreed for delivery of an Interim AQMP have lapsed. Appointment of a competent air quality specialist/organisation to carry the works in accordance with an agreed scope of work is a priority.
3. *Air quality – ambient air quality monitoring*. The scope of air quality monitoring undertaken falls short of the scope specified in the Environmental Monitoring Programme (EMoP). A comprehensive review to be conducted of air quality monitoring capabilities resulting in corrective actions, with consideration given to:
  - In-house competencies to operate and maintain complex equipment/training needs; and
  - Procurement of spares (holding spares in stock).

<sup>2</sup> IDI, ADREMGUI, CECIDE (June 2020) *The Relocation of Hamdallaye Village in the Midst of Covid-19: How CBG is Failing to Meet the IFC Performance Standards*.

4. *Community Relations and Resettlement teams' staffing.* The Community Relations and Resettlement teams remain under considerable pressure to maintain effective delivery of their responsibilities plus any new functions that may be allocated to them. A review of the staffing situation is required, irrespective of a plan to have additional staff members by the end 2020, in the context of the expected role/workload for the Community Relations and Resettlement teams and the role and size of similar departments in other mining companies in Guinea and other west African countries. Following this review 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.
5. *Community Relations and Resettlement teams' capacity and resources.* The need to increase capacity and resources within the Community Relations and Resettlement teams was highlighted by the IESC in a previous site visit trip and remains a priority item that is recognised by CBG. In addition to the afore mentioned Time-bound Recruitment Plan, CBG should prepare a Time-bound Capacity Development and Resource Acquisition Plan (2021 to 2024). This Plan should include *inter alia*: acquisition and provision of adequate technical resources (such as GPS handsets and vehicles, digital platform/s, training in the use of equipment, digital platform/s and a continuing professional development procedure). Continuing professional development actions will focus on provision of training.
6. *Hamdallaye and Fassaly Foutabhé: livelihood restoration.* Delays in delivery of livelihood restoration work streams for both Hamdallaye and Fassaly Foutabhé due to COVID-19 restrictions on movements. Prepare an implementation plan with input from local authorities and taking COVID-19 restrictions into account, to maximise CECI's on-site activities in the second half of 2020 and into Q1 of 2021.
7. *Procurement.* Procurement delays have hindered resettlement-related actions such as community infrastructure provision. Designate "focal persons" for resettlement-related requirements in general services departments, who will be responsible and accountable for timely delivery of services. Also, more use of outsourcing when internal resources are stretched (for example, for design of simple community infrastructure).
8. *Mine Rehabilitation – Ecological Restoration.* CBG is not meeting its targets on progress of mine rehabilitation primarily due to lack of sufficient mined land and equipment being released by the mining department. In order for CBG to meet its target to reduce the amount of non-rehabilitated land, measures must be implemented to release mined land more quickly and equipment when needed to enable timely rehabilitation.

### **Moderate significance findings**

1. *HSECQ staff turnover.* There has been a relatively high turnover of senior staff with posts remaining vacant for several months at a time. The recruitment process and parties responsible for recruitment and succession planning to be reviewed. Measures to recruit and retain key staff, including alternative conditions of employment to be considered.
2. *Occupational health and safety.* A second serious accident at the port, in the past two years, has occurred. The incident could have been avoided if safe practices had been employed. A comprehensive safety audit of port operations and the health and safety culture is needed. Remedial actions should be put in place should the audit reveal any shortcomings.
3. *E&S Management Plans.* The implementation of the Action Plans (embedded within the Management Plans) is, in most cases, significantly behind the proposed schedule. Convene a multi-disciplinary working group to assess the need to amend specific Action Plans and recommend any required changes focusing upon i) duplication of actions between plans, ii) feasibility of implementing certain actions and iii) preparing revised timeframes as appropriate, in light of progress to date and

uncertainties such as COVID-19. Also, these changes be made cognizant of short-term priority actions and CBG's commitment to bring current operations up to a level consistent with the intent of the IFC Performance Standards by January 2024. Lenders must be informed of revisions in accordance with the MoC Procedure.

4. *SMB Railway - Several poor practices have been identified at SMB facilities.* The IESC acknowledges that CBG does not have the power to enforce remedial actions upon SMB, but nevertheless it is recommended to expand the scope of inspections to include consideration of PS2, Labour and Working Conditions and share its findings with SMB and Guinea regulators. In particular, CBG should consider factors encouraging influx and endeavour to inspect workers' camps and employment conditions.
5. *Air quality - disclosure of monitoring results.* The Stakeholder Engagement Plan (SEP) outlines several initiatives relating to participatory monitoring, including presentation of monitoring results to communities, which are not implemented. Revisit the statements made in the SEP and give further attention to the presentation of monitoring results (air quality results and others as relevant) to affected communities. CBG's disclosure to communities should be reported in the AMR.
6. *Water quality - Wastewater Treatment Plant (WWTP) at Sangarédi.* The installation of the UV treatment plant at the Sangarédi WWTP remains an outstanding issue despite the plant being in-country. Priority should be given to completion of this installation to prevent any further delay, pending the lifting of current COVID-19 travel restrictions.
7. *Water Quality - oil/water separator.* Discharges from the oil/water separator located adjacent to the tank farm in Kamsar continue to exceed the IFC limit. Priority to be given to finalising and implementing a preferred engineering solution to ensure the treated effluent satisfies the IFC oil-in-water limit.
8. *Water quality monitoring.* Water samples are not been analysed in full compliance with the EMoP. Full analytical capability for water sampling to be procured as a matter of priority to ensure analysis of all samples in accordance with the EMoP during a transition period that is intended to allow CBG to strengthen its own capabilities, noting that COVID-19 is delaying procurement of certain analytical equipment.
9. *Solid waste disposal.* CBG has previously faced community objections, including road blockages, when attempting the transport of heavy garbage trucks through villages *en-route* to the Bendougou landfill facility. Engagement is needed with affected communities, located along the access route, prior to any recommencement of transport of heavy garbage trucks through villages *en-route* to the Bendougou landfill facility.
10. *Resource use - GHG emissions.* CBG did not report GHG emissions in the 2019 Annual Monitoring Report (AMR) nor has it reached internal agreement on use of an internationally-recognised method for calculating of GHG emissions. Internal agreement on a methodology for calculation of GHG emissions, consistent with an internationally recognised methodology, must be reached soon and GHG emissions reported in the 2020 AMR and each AMR thereafter. Also, an external energy efficiency consultant to be commissioned to identify opportunities to reduce energy use and, therefore, GHG emissions.
11. *Stakeholder Engagement Plan.* The SEP has been in force for almost 5 years, it is now necessary for an overall SEP revision/update to occur. Revise/update and re-issue the Stakeholder Engagement Plan. This revised/updated Stakeholder Engagement Plan should be time-bound (January 2022 to December 2025) and be disclosed, publicly, by CBG. The current 2019-2020 Action Plan to be extended until the 31 December 2021 to cover the period before the revised/updated Stakeholder Engagement Plan is operational. This extended Action Plan will be aligned with the current version of the Stakeholder Engagement Plan (as amended to incorporate the MUOA Project).
12. *Community Grievances.* There are continuing lengthy delays in closing out certain grievances. 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 recognising the legitimacy of grievances and then implementing the actions to close them as quickly as possible.

13. *Workers' Grievance Mechanism.* CBG has a draft CBG-focused Workers' Grievance Mechanism (direct employees only) which is not yet PS2 compliant or 'approved' by Lenders/IESC and a PS2-compliant Workers' Grievance Mechanism focused upon MUOA contractors only. Thus, currently, only MUOA-contracted workers are covered by a PS2-compliant Workers' Grievance Mechanism. CBG need to act to:
  - Finalise the CBG-focused Workers' Grievance Mechanism (and to include a statement that it applies not only to direct employees, but potentially also to contractor employees if the contractor does not have a compliant Workers' Grievance Mechanism); and
  - Ensure that, during the process of appointing contractors, CBG checks that contractors have a PS2-compliant Workers' Grievance Mechanism and, if not, requires the adoption and implementation of the CBG Worker's Grievance Mechanism by the contractor (in line with section 6.5 of the Contractor Management Plan).
14. *Workers' Grievance Mechanism.* Once the Workers' Grievance Mechanism is approved, CBG to disseminate it to all CBG personnel and all its contractors, needed for its core business processes (as defined by PS2), for adoption by all contractors that do not have a PS2-compliant Workers' Grievance Mechanism. CBG and Contractors will reinforce the message to both their own staff members, and in the case of contractors to sub-contractors, that CBG operates a procedure whereby all direct and contracted workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.
15. *Contractor/Sub-contractor labour and working conditions management.* Once the HR Manual is in place, the HR department to prepare a brief implementation action plan to ensure that CBG will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This action plan to include capacity-building for key staff and, as necessary, revision to existing functional responsibilities.
16. *Community H&S risks.* Rail-related risk to community members has increased over the past two years and will continue to increase until end 2022. 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.
17. *Hamdallaye resettlement – resettlement site.* Effectiveness of training on use of domestic facilities such as latrines and household hygiene is not known. Evaluate effectiveness of training to date, especially regarding training on use of domestic facilities such as latrines and household hygiene for men, women and children, and, as necessary, provide targeted refresher training.
18. *Hamdallaye resettlement – resettlement site.* Outstanding works (runoff drainage, access roads to agricultural land, plantations around community facilities, teachers' houses, etc) need to be completed. Expedite procurement and execution of the few outstanding works with works to be completed by end of 2020.
19. *Hamdallaye resettlement – resettlement site.* Housing and infrastructure deficiencies and residents' grievances exist. Implement a rapid PAP satisfaction survey after the end of the rainy season to identify any deficiencies so that they can be addressed timely. To be done in Q4 2020.
20. *Integration of mine and resettlement planning.* The current approach of preparing LRPs on a PbP basis is complex and adds to CBG staff workload. Consideration to be given to preparing LRPs [Livelihood Restoration Plans] for two- to three-year mining cycles rather than by plateau.
21. *Consultancy Support.* The Scope of Work for the framework contract with a consulting firm to assist with resettlement-related tasks is being prepared. The Scope of Work should include the drafting of LRPs and Resettlement Action Plans (RAPs) in addition to field-based work such as asset inventories and engagement.

22. *Collaboration with GAC.* Successful collaboration with GAC is key for the success of the Boulléré onsite offset as the offset area crosses concession boundaries. There is a need for continued close collaborative working on the offset and for offset matters to be raised at a senior management level (on a sustained basis) during CBG's discussions with GAC, to help ensure the success of the offset, to the benefit of both companies.
23. *Marine Surveys.* Updated marine surveys are required to provide an accurate baseline for consideration of future activities in the marine environment. Surveys must be completed in a timely manner prior to future dredging activities/use of new dredge spoil disposal site/s.
24. *Réseau Environnement Bauxite (REB).* CBG currently has the presidency of REB and this provides a unique opportunity for it to develop and lead best practice in mine rehabilitation. 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, Community Relations and Mining teams with the aim that such collaboration will address earlier identified issues such as delays in land restoration.

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

### **Scope Limitations and Exceptions of the Assessment**

Ramboll has performed this monitoring audit in accordance with the scope of services outlined in our contract (CBG-5G-EXP1-019-G-S – Amendment No. 005-v2), dated 3rd February 2020. However, as a result of travel restrictions caused by the COVID-19 pandemic, the IESC was unable to visit the CBG site. Consequently, face-to-face interviews with third parties was not possible. Similarly, Ramboll was unable to undertake ground truthing of its findings and instead has relied on information provided by CBG, including photographic evidence and third-party documentary evidence.

## 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 'Project' or 'Expansion Project'), Guinea.

In fulfilling the role of Lenders' Independent Environmental and Social Consultant (IESC), Ramboll has a duty of care to the Lenders to the Project, including the Policy Lenders comprised of the International Finance Corporation (IFC), 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 monitoring visits each year during construction of the Phase 1 Expansion; however, a planned trip in early 2020 was initially postponed due to security concerns and then a second time following the onset of the COVID-19 pandemic. Following postponements of the monitoring trip and due to ongoing COVID-19 travel restrictions it was decided to undertake a virtual site visit (VSV).

The VSV was undertaken after receipt of the 2019 Annual Monitoring Report (AMR) and was based on a series of technical meetings implemented over a two-week period during the weeks commencing 13<sup>th</sup> and 20<sup>th</sup> July 2020. The meetings were held via conference calls involving representatives from Ramboll, CBG and the Policy Lenders. To the extent possible, CBG presented photographic evidence and presentational material in support of its E&S performance. CBG also provided supporting documents and other materials in response to information requests made by the IESC/Policy Lenders.

This report provides the findings following the VSV. The VSV focused upon an assessment of CBG's E&S performance against Project commitments and applicable Project Standards, specifically, IFC Performance Standards (PSs) and applicable World Bank Group (WBG) Environmental, Health and Safety (EHS) guidelines. Thus, the report identifies E&S risks associated with the Project's current status.

The IESC was unable to visit CBG's facilities which prevented face-to-face interviews with stakeholders and inspection of facilities for ground-truthing purposes. Whereas this is clearly not ideal, the IESC was able to hold detailed technical discussions with CBG representatives. Such meetings were held, primarily, with CBG staff from the Health Safety Environment, Communities and Quality (HSECQ) department as follows:

- the Health, Safety and Environment (HSE) Team including those responsible for the audit programme and environmental management and monitoring;
- Biodiversity Manager and team members;
- Resettlement Manager and team members; and
- Community Relations (CR) Manager and team members.

In addition, representatives from other departments/entities were interviewed as follows:

- Human Resources;
- Compliance;
- Security;
- Phase 1 Expansion Project; and
- Chemin de Fer de Boké (CFB).

A team of four from Ramboll accompanied by E&S specialists from IFC, DFC and UFK, participated in the VSV meetings to assess CBG's progress towards meeting the requirements of

the Environmental and Social Action Plan (ESAP) and the various management plans referenced therein, and more broadly CBG's HSECQ performance. For the VSV, greater emphasis was placed on the contents of CBG's 2019 Annual Monitoring Report.

Throughout the VSV, the IESC team was granted full access to CBG documentation and received full cooperation from the CBG HSECQ department/others. Members of the IESC/Policy Lender team split into sub-teams, for most of the VSV, to focus on the team members' disciplines, namely: i) HSE (excluding biodiversity); ii) biodiversity; iii) social (excluding resettlement, except for the MUOA Project) and iv) resettlement. This report presents key visit findings in sections that align with the applicable IFC PSs.

The IESC last visited the CBG concession in July 2019, following a series of regular six-monthly visits since the first visit in September 2016. Thus, although 12 months had elapsed since the July 2019 site visit, the IESC team has an in-depth understanding of the Project and CBG's operations and was able to focus its efforts on current key issues whilst also following-up on issues raised in previous site visit reports. More specifically, the trip presented the IESC with an opportunity to hold detailed discussions on the following topics:

- General:
  - HSECQ structure and resourcing;
  - Measures in place in response to protect the CBG workforce and communities from COVID-19;
  - Status of the SMB Rail construction (within CBG's South of Cogon concession); and
  - Status of COBAD Road Operations (within CBG's South of Cogon concession);
- HSE:
  - Status of HSE Management Systems;
  - Audit and inspection programme; and
  - Implementation of Management Plans, including those relating to *inter alia*: Emergency Response, Air Quality, Noise and Vibration, Waste, Hazardous Materials, Dredging, Resource Use and Efficiency, Water Quality and Contractor Management;
- Social:
  - CR resourcing;
  - Labour and working conditions;
  - Worker demobilisation (Phase 1 Expansion Project);
  - Road and rail safety;
  - Stakeholder engagement and community-level grievance management;
  - Security;
  - Implementation of Management Plans (Community Development, Cultural Heritage, Influx management, Stakeholder Engagement, Community Health and Safety, Security and Local Content.
- Resettlement:
  - Hamdallaye village move;
  - Hamdallaye and Fassaly Foutabhé livelihood restoration;
  - Kankalaré Resettlement Action Plan (RAP);
  - Resettlement implementation capacity;
  - Gender (resettlement-related stakeholder engagement); and
  - Mine and Resettlement Planning.

- Biodiversity:
  - Biodiversity Management System Update;
  - Plateau-by-Plateau (PbP) approach;
  - Biodiversity Inspections;
  - Dredging and the Marine Environment; and
  - Mine rehabilitation.

The VSV itinerary is provided in Appendix 1.

This report focuses on the findings made during the VSV; however, it also refers to earlier reviews and reports, reflecting the ongoing nature of many ESAP deliverables and Ramboll's ongoing role as the IESC in monitoring CBG's HSECQ performance.

## 2. SCOPE AND STRUCTURE OF THE REPORT

### 2.1 VSV 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 Project E&S commitments and in doing so, present E&S risks associated with the Expansion Project and CBG's operations. This report has been prepared for the attention of CBG and Lenders.

The report presents the findings of the desk-based VSV based on information gained following:

- A review of ESAP implementation;
- A review of certain HSECQ Management System documents;
- Review of the AMR
- Interviews held with key HSECQ staff within CBG; and
- Interviews with other CBG functions.

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

### 2.2 Project standards

In accordance with Ramboll's Terms of Reference, the Project was assessed against the following standards and guidelines:

- Applicable laws and regulations of Guinea;
- Specific commitments made by CBG and requirements specified in the ESAP;
- IFC PSs (2012):
  - PS1: Assessment and Management of Environmental and Social Risks and Impacts;
  - PS2: Labour and Working Conditions;
  - PS3: Resource Efficiency and Pollution Prevention;
  - PS4: Community Health, Safety, and Security;
  - PS5: Land Acquisition and Involuntary Resettlement;
  - PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and
  - PS8: Cultural Heritage; and
- WBG EHS Guidelines applicable to the Project.

PS7 (Indigenous Peoples) was excluded as no Indigenous Peoples are affected by the Project.

### 2.3 Structure of the report

Section 3 provides a very brief description of the Project status. Section 4 describes how different levels of significance are attributed to issues highlighted in the report. The report is then structured around the seven IFC PSs applicable to the Project, as listed above, and supporting EHS general and sector specific guidelines. The key findings identified during the audit and IESC recommendations to address them are summarised in 'significance tables' for each PS (Section 4).

Appendix 3 provides a status update for the consolidated list of 'open' issues identified in the previous monitoring visits. The status of previously identified issues is 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 this situation, an update of the issue is provided in the main body of this report, and the previous issue from July 2019, 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 practice. However, due to the compliance-focused nature of this report, the broad range of aspects covered/large amounts of review documentation made available, and for the sake of brevity, the report is focused on areas for improvement.

## **2.4 Limitations**

Ramboll was unable to travel to Guinea due to COVID-19 related travel restrictions. Consequently, there has been no visual inspection or ground truthing to inform this report. Therefore, the findings are based on photographic evidence provided by CBG, review of documentation and, importantly, discussion with CBG representatives.

### 3. PROJECT STATUS

This section provides a brief description of the Expansion Project status and other CBG activities ongoing at the time of the VSV.

#### 3.1 Status of the Expansion Project

At the time of the VSV, construction of the Expansion Project was largely complete and most of the construction contractors associated with the Expansion Project had left the site. More specifically:

- New mine equipment had been delivered and operational;
- Additional rail sidings, locomotives, new wagons and modification of existing wagons completed/delivered and operational;
- Crushing station (tippler, rail loop, primary crusher, secondary crushers and upgrade of conveyors) completed;
- Extension of the mineral quay, dredging of the turning circle and procurement of a new tugboat completed; and
- Upgrades to powerhouse and utilities completed and operational.

Residual activities for the Expansion Project pending completion were limited to:

- Additional workforce housing is ongoing with completion expected in December 2020; and
- Construction of the Dryer 4 ongoing/undergoing modifications and commissioning of new dryer 4 yet to be completed.

Testing of Dryer 4 has revealed it cannot operate at the original throughput level of 1500tph presented in the design specification. Modifications made in early 2020 have improved the throughput, although it still remains well below the design specification at 900tph. Additional modifications have been proposed that are under evaluation by CBG's Engineering Department. Thus, the final design and timeframes for further modifications are not yet confirmed. CBG has confirmed the three existing dryers plus Dryer 4 operating at 900tph will be sufficient for the drying of 18.5Mtpa and that Dryer 4 at full capacity will only be needed for future expansions beyond 18.5 Mtpa.

Dryer 4 will operate a dust control system comprised of a multi cyclone collector followed by two Ventri-Rod scrubbers<sup>3</sup>. The design outlet dust load is 150-300mg/dsm<sup>3</sup>.

#### 3.2 Status of other construction activities in the South of Cogon Concession

The following activities are in progress:

- Punch list for house/infrastructure at the new Hamdallaye village;
- Land rehabilitation at new Hamdallaye village;
- SMB rail within the CBG concession is 12 months into an 18-month construction period;
- Continuing preparatory 'assessment' work for construction of the Kagneka haul road); and
- Stripping activities in preparation for mining [*Post-VSV Note: a map showing 'permitted' stripped plateaux was provided to the IESC – see Figure Figure 3-1*).

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<sup>3</sup> Drying plant for Bauxite - technical description CBG-K019-55-MAN-0061, Cemtec, 5/3/19

CBG BAUXITE MINE PHASE 1 EXPANSION & OPERATIONS

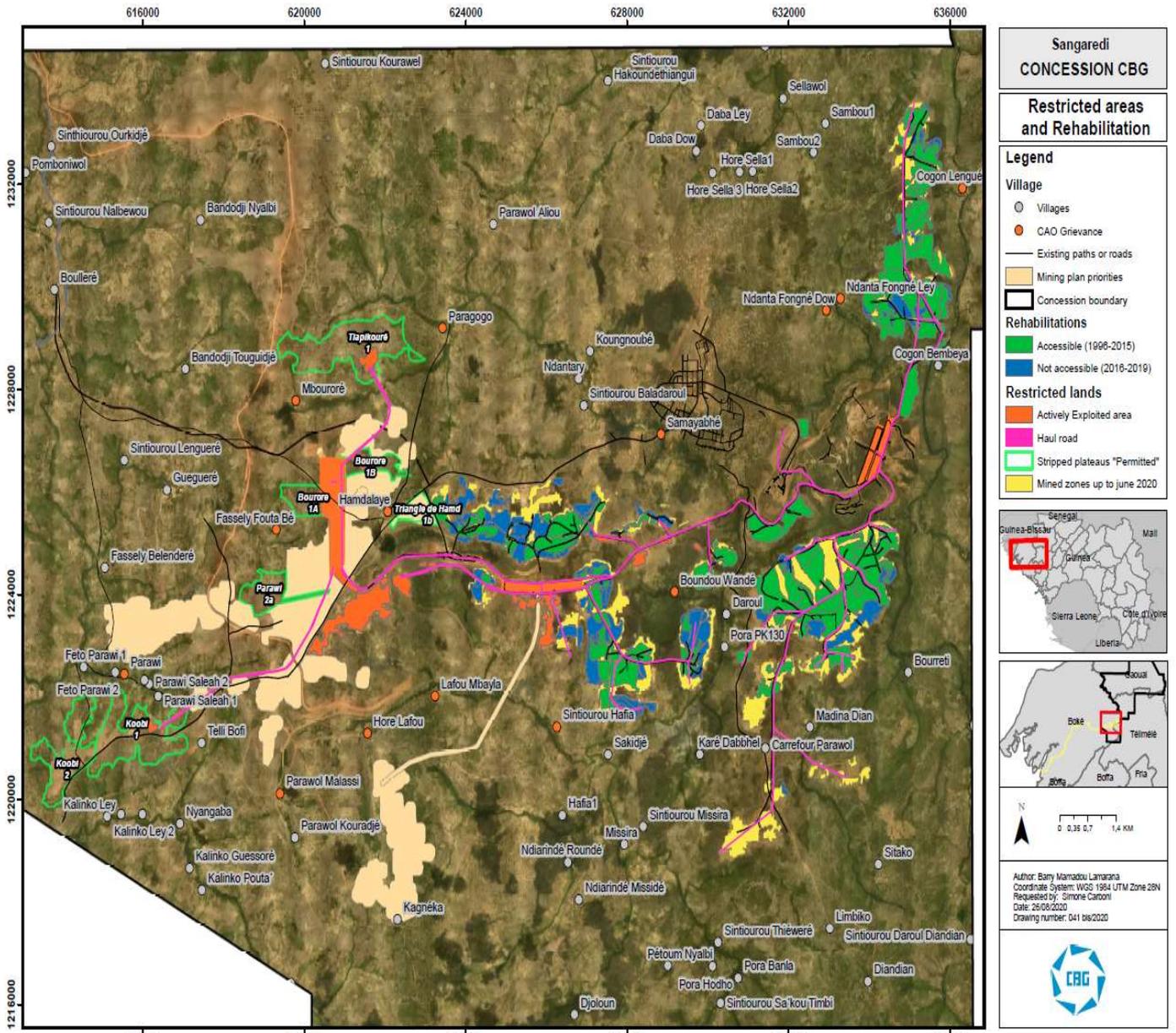


Figure 3-1: Areas with restrictions on land use ('permitted' stripped plateaux).

## 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 Table 4-1 below):

- The topic/aspect;
- A description of the issue, for example deficiencies or omissions;
- The phase(s) to which an issue relates;
- Recommendation, where applicable, to resolve/manage the 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.

**Table 4-1: Example of the summary table format**

ID	Aspect	Issue Description	Phase <sup>4</sup>	IESC Recommendations	Significance
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities.  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>4</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 HSEC Resources

This section provides an update on HSECQ resources, including discussion around senior HSECQ positions and the CR team. Further detailed commentary on resettlement-related resources is included in Section 9.5.

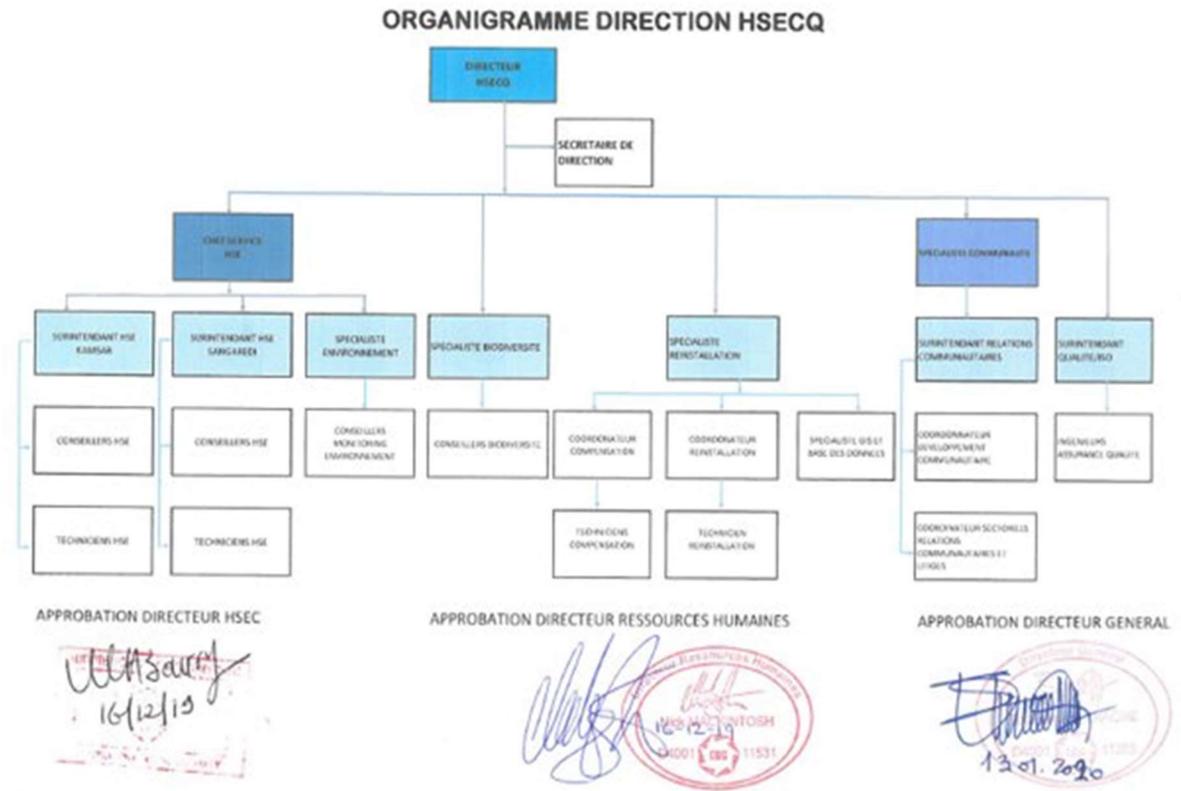
#### 5.1.1 Senior HSEC positions

The AMR provides information on the structure of the HSEC Department accompanied by an organigramme. It confirms that there is now only a single department (amalgamation of Operations with the Expansion Project) and that the Quality function has been added (title of the department is now HSECQ). During the VSV, the IESC requested an update on the status of the Health Department. It was confirmed that the Health Department is located within the Human Resources Department and not in the HSECQ Department as indicated in the AMR. A copy of the current HSECQ Department organigramme is shown in Figure 5-1:.

In the second half of 2019 CBG appointed new Biodiversity and Resettlement Managers. Both positions were replacements following the resignations of the previous post holders. For the latter, there was a period of approximately [6 months] during which CBG did not have a dedicated Resettlement Manager. CBG appointed a replacement HSECQ Director following 12-months in which the post had remained vacant. The HSECQ Director and Resettlement Manager are key hires because these posts were vacant for significant durations. These hires, in addition to the Biodiversity Manager, brought the HSECQ Department close to a full complement of senior filled HSECQ positions. However, in January 2020 the Environment Manager left CBG having been in post for one year.

The Environment Manager has responsibility for managing a team of environmental officers and overall responsibility for the implementation of a suite of management plans including plans for the management and monitoring of air; water; noise and vibration; waste, hazardous materials as well as contributing to implementation of other management plans. CBG fully recognises the significance of this post and the need to fill the position with a suitably qualified replacement Manager with minimal delay. The IESC shares the view that the post is critical to CBG's environmental performance and that a replacement should be found as a matter of priority.

During the VSV, the IESC was informed that the post of Environment Manager had been advertised since February 2020 and that, at the time of the VSV, a number of candidates had been identified for interview, although planned face-to face interviews have not been possible due to COVID-19 travel restrictions. Shortly following the VSV, during the writing of this report, travel restrictions were relaxed allowing some travel out of county and the potential for interviews. The IESC was informed that CBG aims to have the post filled by September 2020. The implications of the vacant post are discussed later in this report – See Chapter 7.



**Figure 5-1: Current HSECQ Organigramme (dated January 2020)**

Whereas the successful recruitment in late 2019 and 2020 to fill key HSECQ posts is good news, the IESC notes that there has been a relatively high turnover of senior HSECQ staff with posts remaining vacant for several months at a time. The overall result has been detrimental to CBG’s management of HSECQ matters. Therefore, it is recommended that CBG reviews its recruitment process and the role of the parties responsible for recruitment and succession planning to try to avoid or, at minimum, reduce time 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 are to be considered.

5.1.2 Community Relations

The CR team remains stable and effective under the leadership of the CR Manager. Although the CR Manager’s contract terminated on 23 September 2019 it has since been renewed and the Manager remains in post. This is a very encouraging development as the Manager is very experienced, capable and brings continuity to both the work of the CR team and to the successful operation of current and, indeed, future linkages with internal and external CBG stakeholders.

The CR section has four personnel based in Kamsar and three personnel in Sangarédi, as was the case in 2019 and in earlier years (the planned addition of two new staff members in 2019 has not yet occurred). However, plans are advanced to recruit two new personnel by the end December 2020, as follows:

- Community Development Co-ordinator (Kamsar office base and reporting to the CR Superintendent); and a
- Community Relations Co-ordinator (Sangarédi office base and reporting to the CR Superintendent).

The CR Manager confirmed that the two posts to be filled by end December 2020 are not the same as the original posts planned to be filled in 2019.

Although the CR team still assists with resettlement activities; it is in a more supportive role than previously. The arrival of the Resettlement Manager, in the second half of 2019, has alleviated the resettlement workload for the CR team. However, the CR team has been, and continues to be, active in relation to the MUOA project; most recently, with respect to managing community engagement activities undertaken to assist preparation of the Transitional Measures Plan (TMP). Also, the CR team has a primary responsibility for implementation of a suite of 'social' management plans including some plans that crossover to other topics; for example, the Community Health, Safety Management Plan and the Cultural Heritage Management Plan. Finally, the CR team continues to be active in managing CBG's Community Investment (CI) projects (a task often undertaken, in other companies, via a distinct CI or Corporate Social Responsibility team).

An important need for recruitment of additional staff has been recognized by the IESC following previous monitoring visits. Also, during the IESC's July 2019 monitoring visit, some challenges in terms of support resources became apparent (for example, availability of GPS handsets and vehicles). During the VSV, the IESC ascertained that the CR team now has access to a recently acquired, but not exclusively for CR personnel use, a Trimble Yuma tablet computer. This is hand-held and easily portable in the field. As the CR team is responsible for managing cultural heritage issues, it is very important that sites are mapped accurately. Also, the increasing sophistication of the 'Plateau-by-Plateau/Land Disturbance Permit' approach, in term of integrated GIS-based mapping of environmental, social and cultural heritage, requires digitalisation of location co-ordinates. Although undoubtedly useful, access to a shared Trimble Yuma tablet computer is not an ideal situation. Allocation of several GPS handsets to the CR team would be a beneficial and cost-effective addition to the existing resources that the CR team currently utilises to undertake its workload.

In the IESC's July 2019 monitoring visit report, the importance of improving the digital platform, available to the CR team, to enhance its ability to manage stakeholder engagement/grievance management and other key activities more effectively was highlighted. During the VSV, the IESC was informed that a decision had been made to acquire such a digital platform and acquisition was expected by end December 2020.

The CR team has been in receipt of support from CBG shareholders on a continuing basis. Most of the support provided has been provided via conference calls and emails, with the occasional visit to CBG (until imposition of local COVID-19 restrictions in early March 2020). Shareholder support on social topics has included the following:

- Hamdallaye/Fassaly Foutahbé resettlement issues;
- Social Management Plans;
- Preparation of the Past Compensation Report (ESAP item); and
- Grievance management.

Also, training has been provided by a social specialist from Rio Tinto to CR and Resettlement personnel on the following themes: international social performance standards, procurement and local employment, regional economic development and regional partnerships.

The IESC understands that some of this ongoing support predates the assistance that can be made available to CBG via the Management Assistance Agreement with Alcoa (a CBG shareholder) which has an effective date of 1 January 2020 and which the IESC understands to terminate on 31 December 2024 (although renewal for a further 5 years is possible if agreement is reached by 31 December 2023).

By end December 2020, it is expected that the personnel complement of the CR team will be enhanced, and this is a welcome outcome. Nevertheless, as CBG continues to expand its activities, the IESC considers that the CR team will remain under considerable pressure to maintain effective delivery of its responsibilities plus any new functions that may be allocated to it. With the completion of Phase 1 of the Expansion Project, the IESC considers that it is appropriate to restate and update its main staffing recommendation, presented in its July 2019 monitoring report.

Since July 2019, the lenders and IESC consider that both the CR and Resettlement teams face similar challenges in terms of staffing/resources. To avoid duplication of the recommendations within this report (under PS1 and PS5 Sections) the recommendations below apply to both teams.

First, it is recommended that CBG senior management requires the HSECQ Director to review the CR and Resettlement teams' staffing, for the next 3 years (2021 to 2023), irrespective of any new staff members that may be appointed by end 2020, in the context of the expected role/workload for the teams and the role and size of similar teams in other mining companies in Guinea and other west African countries as benchmarks.

Following this review, the HSECQ department should prepare and implement a Time-bound Recruitment Plan 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), by focusing on urgent hires in specific disciplines/activities and capability to establish arrangements such as framework consultancy contracts. Further, it is recommended that the actions in this Plan are should be accepted by CBG senior management and the finances needed to ensure implementation of the actions are included into the appropriate budgetary mechanisms.

Further, to support implementation of the Time-bound Recruitment Plan, the IESC recommends that a companion Time-bound Capacity Development and Resource Acquisition Plan for both teams is prepared and implemented for the next 4 years (up to 2024). This Plan would include acquisition/provision of adequate technical resources (such as GPS handsets, digital platform/s and vehicles), training in the use of equipment and the digital platform/s and establishment of a continuing professional development procedure. Continuing professional development actions will focus on provision of training, to be provided by a specialist external entity, which is aligned with IFC good practice and which will include, at minimum, such topics as communication tools, resettlement practices, stakeholder engagement, data management, and grievance mechanism management.

## **5.2 Management Systems**

The IESC confirms that the following ISO certificates, scheduled for renewal in March 2020, have been renewed and will remain valid until Q1, 2023.

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

The restructuring of the HSECQ Department to include Quality has resulted in 4 full-time quality auditors now sitting in HSECQ Department. The HSECQ Director is currently reviewing CBG's HSECQ-related management systems and has indicated the system(s) are robust, however further training is required to ensure better implementation of certain Management System elements.

Of note, CBG currently relies on a paper system and is considering IT solutions to help in management of audits/corrective action tracking, although this is a longer-term goal. Such electronic systems, which are considered by the IESC to be representative of good practice in the mining sector, can prove very effective in the tracking and close out of corrective actions. Thus, CBG's longer term goal to transition from a paper to a digital-based system is supported by the IESC although it is recognised this is not an immediate priority for CBG.

### **5.3 Land Disturbance Permit**

The Land Disturbance Permit process has been described in earlier IESC monitoring reports and is not duplicated here. In terms of its implementation, the process has been adopted across CBG's operations and appears to be working well with clear examples of HSECQ matters receiving proper attention. For example, in the case of the proposed Kagneka haul road, the route alignment was twice re-routed during LDP process, first to avoid a school and then to avoid cultural heritage and biodiversity features, thereby demonstrating adherence with the mitigation hierarchy (avoidance). A second notable example was the postponement of maintenance dredging activities because of seasonal constraints (fish spawning).

The LDP process is closely linked and applicable to the PbP approach for the opening of mining areas; however, it also applies across all areas of operations, including dredging/haul roads. See Sections 10.3 and 9 concerning its application to biodiversity matters.

### **5.4 Environmental and social management plans**

#### **5.4.1 Background**

The ESAP includes a requirement to, "Update the Environmental and Social Management Plan (ESMP) to include the existing CBG operations, the Phase 1 Expansion and any future expansions". By January 2019, the full suite of E&S management plans had been updated<sup>5</sup> to apply to all CBG operations (rather than be specific to the Expansion Project) and were considered complete and 'signed off' by the IESC.

A key component for most of the management plans is the inclusion of an action plan, detailing firm commitments to undertake future actions with timeframes and responsible parties identified for each action. The management plans provide the basis on which CBG manages its HSECQ performance going forward, and therefore provide a useful tool for internal audits.

#### **5.4.2 Amendments to management plans: incorporation of the MUOA Project**

In its July 2019 monitoring report, the IESC noted that CBG would need to review and potentially update the management plans to incorporate mitigation measures/actions specified in the MUOA ESIA Report (2017) and any supplements to the MUOA ESIA Report. It was noted, further, that this MUOA-induced review provided an opportunity for CBG to make other/multiple changes in a single revision thereby limiting the number of potential Management of Change (MoC) notifications necessary (amendments to any management plan requires Lender acceptance of the proposed changes via the MoC Procedure).

As of 17 July 2020, CBG had issued Potential Deviation Notices (PDNs) for the following plans (all amended to take account of the MUOA Project), as follows:

- Cultural Heritage Management Plan;
- Stakeholder Engagement Plan;
- Community Development Plan;

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<sup>5</sup> All plans were updated, however further studies were required to finalise the Air Quality Management Plan.

- Local Content Plan; and the
- Environmental Monitoring Programme.

Further PDNs are expected in the near future.

In addition, CBG issued a revised version of the Worker Accommodation Design Plan in July 2020 (original version was dated 2016)<sup>6</sup>. This Plan was not approved by the IESC or Lenders and is not subject to the MoC procedure. Lender/IESC comments on the revised version of this Plan were sent to CBG on 28 July 2020.

#### 5.4.3 Management Plans: progress review of Action Plan implementation

##### *Environmental Management Plans*

In its July 2019 monitoring report, the IESC reviewed the implementation status of several environmental management plans. The IESC recognised good progress in many areas, including progress on long overdue issues relating, for example, to waste and water management. However, the IESC noted that it was evident that progress was well behind the schedules outlined in the Action Plans and considered that this 'lagging' progress might be due, in part, to the delays experienced in finalising the management plans/action plans making timeframes challenging at the time of sign-off.

During the VSV, implementation of most of the E&S management plans were reviewed. In terms of environmental management plans, the review focussed on 8 plans that were finalised and signed off by the IESC in January 2019, as listed below:

- Air Quality Management Plan;
- Dredge Management Plan;
- Environmental Monitoring Plan;
- Hazardous Materials Management Plan;
- Noise and Vibration Management Plan;
- Resource Use and Energy Efficiency Management Plan;
- Waste Management Plan; and
- Water Management Plan.

The IESC has previously reported on the team structure in place for delivery of these plans (primary and secondary champions with responsibility for each plan working under the guidance of an Environment Manager) and highlighted no concerns.

During the VSV, progress updates were sought for each environmental action plan with the overall progress summarised in the table below.

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<sup>6</sup> Development and implementation of this Plan was a CBG Phase 1 Expansion Project ESAP item.

**Table 5-1: Findings from review of the certain Environmental Plans**

<b>Management Plan (Action Plans)</b>	<b>#Not started</b>	<b>#In progress</b>	<b>#Completed</b>
Water management	49%	25%	13%
Air Quality	15 (56%)	6 (22%)	6 (22%)
Resource efficiency	60 (59%)	33 (33%)	8 (8%)
Noise & Vibration	9 (26%)	23 (68%)	2 (6%)
HMMP	39 (32%)	74 (61%)	8 (7%)

The table above provides a crude measure of overall progress made but nevertheless, whereas progress is being made by CBG it is also clear that progress is much slower than scheduled in the action plans with approximately 50% of actions not started. The IESC believes there are several factors contributing to the lagging timeframes as follows:

1. There has been no Environmental Manager, with overall responsibility for the implementation of the Management Plans/Action Plans, in post since January 2020 (see also Section 5.2.1, Senior HSEC positions);
2. COVID-19 travel (preventing specialist contractors coming to site since March 2020); and
3. Timeframes were generally overly ambitious irrespective of the delayed finalisation of the plans.

It is the IESC’s view that all three of the factors above are significant contributors to the schedule slippage. The second of the contributory factors is largely outside of CBG’s control, thus CBG should focus on other factors, ensuring a replacement Environmental Manager is found as a priority. CBG should also revisit the timeframes presented in the respective Actions Plans in order to present revised timeframes in light of progress to date, COVID-19 uncertainties and factors 1 and 3 above. The revision schedule should be made cognizant of short-term priority actions and CBG’s commitment to bring current operations up to a level consistent with the intent of the IFC Performance Standards by January 2024. Lenders must be informed of the revisions to the Management Plans/Action Plans in accordance with the MoC Procedure, noting that any change to the management plans will be a Category 2 change.

Further commentary regarding the implementation of these plans is provided elsewhere in this report, most notably Chapter 7, PS3 Resource Efficiency and Pollution Prevention.

*Social Management Plans*

In terms of the social management plans; the review focused on 8 plans (including those plans amended to incorporate the MUOA Project), as listed below:

4. Stakeholder Engagement Plan (see also Section 5.8);
5. Community Development Plan\*;
6. Local Content Plan\*;
7. Cultural Heritage Management Plan (see also Section 11.2);
8. Community Health and Safety Management Plan (see also Section 8.2);
9. Road and Railway Safety Management Plan (see also Sections 8.3 and 8.4);
10. Influx Management Plan\*; and

## 11. Security Management Plan (see also Section 8.5).

In this section, an overview of progress to date for all plans is presented. For those 5 plans that clearly relate to key topics addressed by IFC's PSs, the results of the review of Action Plans, are presented in the sections below on each of the IFC PSs 2 to 6 and then 8. For the remaining 3 plans (identified above with an\*), the reviews of Action Plan progress are detailed in this section.

Implementation of the Contractor Management Plan was also reviewed – see Section 5.11.

### *Overall progress*

All Action Plans apply to a period beginning in Q1 2018 and ending in Q4 2024 (effectively a 7-year period). There are two types of action in these plans:

- Actions which reflect current or new activities. These are actions already underway or actions that begin at a date soon after plan preparation and sometimes before the plan approval/sign-off date. Such actions, and the work to implement them, are described by CBG as 'continuing', in terms of both time period and the work needed to implement them, as they end only at Q4 2024; and
- New actions with a defined start and end date and which are time limited. Some actions take only a short period of time until they are 'completed'; while others have longer implementation periods - these actions and implementation work are described by CBG as 'in progress' or 'completed'.

HSECQ has dedicated a considerable amount of staff time/effort to Plan implementation. For Social plans, most of the implementation work is undertaken by the CR team often in collaboration with other HSECQ teams. Such collaboration is supported by the IESC and indeed, CBG should continuously try to strengthen interdepartmental working practices.

The key findings from the review of the implementation of the Social Plans) are provided below. The Security Management Plan is excluded as it has no Action Plan against which progress can be assessed. The key findings are:

- 'Continuing' and 'in progress' actions constitute a significant proportion of all actions (actual proportion varies by plan);
- For certain plans, start dates for a significant number of actions have been postponed to H2 2020 or H1 2021;
- Almost 1 in 3 actions (30%) have not started (all Plans were signed-off in January 2019);
- 20% of all time-bound actions are completed; and
- The Cultural Heritage Plan and the Community Development Plan show the highest proportion of completed actions (26% and 43% respectively).

Two key challenges to implementation have been identified:

- Duplication of actions within and between plans; and
- Some actions are proving to be difficult to implement; their feasibility is questionable.

The IESC recommends that HSECQ convenes a multi-disciplinary working group to assess the need to amend specific Action Plans and recommend any required changes.

**Table 5-2: Findings from review of the Social Plans**

<b>Management Plan/Action Plans</b>	<b>#Actions</b>	<b>#Not started</b>	<b>#In progress</b>	<b>#Continuing</b>	<b>#Completed</b>	<b>(%) Completed</b>
Community Health and Safety	22	3	2	14	3	14
Local Content	11	5	2	4	0	0
Cultural Heritage	20	4	2	9	5	26
Community Development	13	4	0	3	6	43
Influx	11	7	1	2	1	10
Road and Railway Safety (Rail component)	44	20	0	12	12	27

Specific findings, regarding progress on implementing the following plans, are summarised below:

- Community Development Plan;
- Local Content Plan; and
- Influx Management Plan.

#### *Community Development Plan*

There are 14 actions. Key findings regarding the implementation of this plan are:

- Actions completed (6) relate, mainly, to improved measurement (of performance) and communication of community investments;
- Actions not completed relate, primarily, to actions to install and operate an appropriate database to enable better management of the community development initiatives; and
- Continuing actions relate to direct engagement with local communities on community development plan implementation and developing and implementing a communications plan to inform a wider range of internal and external stakeholders about the community investment programme and its successes/benefits.

With respect to actions involving development of a communications plan, the CR Manager informed the IESC that a new communications specialist has recently joined CBG, based in Kamsar. This specialist is tasked with devising a global communications strategy for CBG. Part of the specialist's remit is to assist with communicating information on HSECQ topics to local communities and, also, more widely. It is understood by the IESC that CBG's community development investments and the attendant outcomes will form part of this activity. To date, CBG has relied on local radio to promulgate such information locally and this is likely to continue, due to the importance of the radio for 'messaging' at the local level, but will be supplemented by more reliance of social media to disseminate the 'messages' more widely both in Guinea and globally.

In addition, the IESC was informed that the specialist will initiate a programme of media content analyses (such as extent of positive, neutral and negative coverage and trends over time) with regular reporting of results to senior management. Media content analysis will be a valuable tool for understanding perceptions of CBG and its activities, tracking changes in perceptions over time (for example, annually) and then, in the event that a trend of increasingly negative coverage

were to be found, taking appropriate action, such as devising a targeted and focused communications strategy to counter it.

#### *Local Content Plan*

There are 11 actions. Key findings regarding the implementation of this plan are:

- No actions have been completed;
- Five (5) actions have been postponed until 2020 and 2021. These concern, primarily, measures to establish an internal Local Content Steering Group; identify purchasing and employment opportunities and constraints; prioritize purchasing and employment opportunities by risk effort, cost, and community development impact and, finally, inclusion of new reporting requirements for CBG contractors in all existing and new contracts (when relevant); and
- There are 6 'continuing' and 'in progress' actions relating to data collection/analysis of local content metrics; community engagement on local content issues; and investigations on the possibility of forming partnerships to provide new financing options for Small- and Medium-sized Enterprises (*Toutes Petites Entreprises*).

#### *Influx Management Plan*

There are 11 actions. Key findings regarding the implementation of this plan are:

- One (1) action was completed relating to purchase of satellite imagery for Kamsar, Sangarédi and the South Cogon concession area. Purchase of the imagery for these areas is to occur every 2 years;
- Seven (7) action have been postponed until 2020 and 2021; mostly relating to collection/analysis of datasets and determination of scale of influx to these areas and attendant risks arising from the influx; and
- Three (3) actions are 'continuing' or 'in progress' mostly focusing upon community and local government engagement regarding influx; especially illegal and speculative land occupation in the mining concession area in the vicinity of Sangarédi.

## **5.5 Stakeholder Engagement**

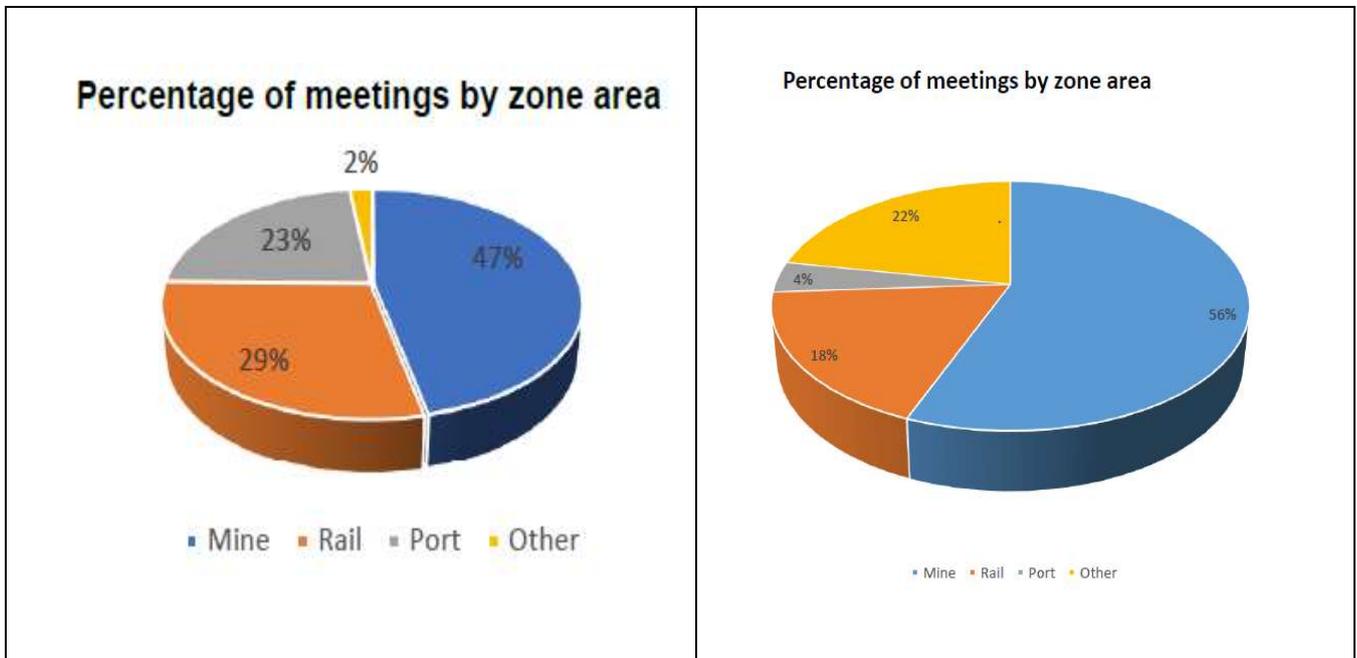
CBG prepared and is implementing a 2019-2020 Action Plan for Stakeholder Engagement and, as with previous Action Plans, the 2019-2020 Action Plan is aligned with 2016 CBG Stakeholder Engagement Plan (SEP). In 2019, the AMR records that 347 stakeholder engagement events occurred. These events are planned according to two key axes: 'zone area' (mine, railway, port and other) and by 'activity' (such as MUOA project, operations, and resettlement). Within this context, consultations focus on a range of key themes as per the SEP; for example, consultations on exploration-related activities in the mine area are used to inform communities on topics such as the grievance mechanism, local labour recruitment and biodiversity management. CBG notes that 30% of the participants in engagement events were female. The AMR confirms that, in 2019, almost 30 'additional' villages were identified and added to the list of stakeholders. No new villages were identified in 2020 to date. [*Post-meeting Note*: the actual number of the 'additional' villages is 25].

In 2019, a key focus was engagement with the fishermen of Port Néné, Port Fory and other landing sites in the Kamsar area. Several awareness meetings were held for sea users, primarily fishermen, focusing upon on proposed dredging, in 2020, of the shipping channel and basin of CBG port. Also, another key focus was engagement with stakeholders in the vicinity of the railway in relation to the MUOA Project - almost 70% of railway-focused consultations concerned the MUOA Project.

Currently, Action-plan based community-focused stakeholder engagement meetings have been postponed until Q4 2020/Q1 2021 as a result of the COVID-19 restrictions in place regarding travel and the maximum allowed size of meetings (number of participants). To date in 2020 (30 June), 83 stakeholder engagement meetings have occurred (prior to introduction to COVID-19 restrictions); with 38 of them being with communities.

**Error! Reference source not found.** compares an analysis of all stakeholder engagement meetings by zone (mine, port, rail and 'other': 'other' generally refers to internal CBG stakeholders). It is necessary to be careful in drawing conclusion as the 'context' for stakeholder engagement during each of the two years are not similar. However, the data do indicate some key differences in the focus of stakeholder engagement between the two years:

- More meetings are occurring in the mine area in 2020 to date than in 2019 (56% compared to 47%);
- Significantly fewer meetings are occurring in the rail and port areas; and
- There is a significant increase in the number of meetings with 'other' (internal stakeholders).



**Figure 5-2: Number of meetings (%) by zone area: 2019 (on left) and 2020 to date (on right)**

The proportions of community engagement meetings (38 from a total of 83 meetings) by zone differ, to some extent, from the breakdown for all meetings. For example, the number of community engagement meetings focused upon the railway is 26% of all community engagement meetings. For all 83 meetings, the equivalent proportion of railway-focused meetings is 18% (Figure 5-2). The difference is explained, probably, by the need to consult 'railway' communities during preparation for the MUOA TMP.

In 2019, CBG intended to engage with coastal and island communities near Kamsar. Meetings were held with the fishermen (Port Néné and Port Fory), but CBG learnt that the island communities were not permanent and that groups inhabit them seasonally; for salt production (in March - April) and for fishing (in December - May). CBG is not certain if the groups are different or the same. During the planning of the engagement campaign, COVID-19 restrictions were imposed, and no engagement occurred. The intent is to engage these coastal communities in Q4 2020/Q1 2021.

CBG has identified key topics and issues raised in its community engagement meetings (2019 – 2020), as follows:

- Meetings are often dominated by grievances and accompanying compensation issues;
- For women a key interest is continuation of CBG support for the development of Income Generating Activities and the formalization of cooperative '*Groupements d'Intérêt Economique*');;
- Local authorities and the youth requested implementation of periodic consultation frameworks (CBG has plans for a new format of discussion via more formal thematic meetings with a range of stakeholders, including youth and local authority groups. Initially the meetings will be annual for each sub prefecture within CBG's operating area, although the frequency will be subject to review based on the outcome of initial meetings);
- The Kamsar authorities and fishing communities wish to have access to CBG's community radio, as well as to hold periodic meetings with all mining companies; and finally
- The main concern raised by the youth remains employment.

Apart from the targeted engagement activities related to TMP preparation and COVID-19 sensitization (see Section 8.6), all engagement activities are aligned with the SEP. The SEP (5G-HSEC-ESMP-PLN-SEP-001) dates from 2016 and is a long and complex document. At the same time as the TMP-related engagement was occurring, CBG made amendments to the SEP to incorporate the MUOA Project. Under the MoC procedure, the amended SEP was submitted to Lenders/IESC. In its review of the amended SEP, the IESC noticed that the changes went beyond incorporation of the MUOA Project, for example, some changes were made to the stakeholder mapping/analysis section of the SEP.

During the Lender/IESC review of the MUOA-amended SEP, it became apparent that the SEP would benefit from a more fundamental revision to simplify and sharpen its focus for future CBG activities. This conclusion reinforced the earlier recommendation, made in the July 2019 monitoring report, that the SEP needed to be updated and re-issued. The IESC review indicated that the revision/updating should aim to ensure a better alignment of the SEP with IFC standards, specifically in the stakeholder analysis/mapping section where Affected Communities are not given the importance allotted to them in PS1. It was also apparent, that some activities, outlined in the SEP, such as participatory monitoring have not been implemented, widely, to date (apart from via the Biodiversity Management System, including the Biodiversity Action Plan). The IESC understands an 'involvement plan', aligning opportunities for participatory monitoring with monitoring activities outlined in the various E&S Management Plans, has yet to be developed. In the case of participatory monitoring, revision of the SEP would enable CBG to propose an approach/method based on experience and to identify support and resources needed, if any (see also Section 7.1.3).

To summarize, the IESC recommends that a revised and updated SEP is prepared for the period of January 2022 to December 2025. The work to revise/update the SEP should reflect future engagement priorities/needs and lessons learnt since 2016. Given the disruption caused by COVID-19 and the need to 'catch up' with postponed engagement activities, the IESC does not consider it to be feasible to finalize the revised/updated SEP until late 2021. Therefore, the current 2019-2020 Action Plan needs to be extended until the 31 December 2021 to cover the period before the revised/updated SEP is operational. However, this Action Plan will need to align with the current version of the SEP (as amended to incorporate the MUOA Project).

In keeping with good international practice, it is recommended that the revised/update SEP is disclosed on the CBG website and a copy is provided to the regulator, the *Bureau Guinéen d'Études et d'Évaluation Environnementale* (BGEEE), and to key local government authorities within whose jurisdictions CBG operates (for each of mine, port, railway zones).

## 5.6 Grievance Mechanism

In the AMR (Appendices: Section III-2 and Section III-3), CBG presents sections of its registers of grievances (*plaintes*) and community requests for assistance (*doléances*) for 2019. Grievances and community requests for assistance are being distinguished and recorded separately.

Overall, the section of the two registers indicate that the recording of data has improved; however, it is noted that there is a difference in the amount of data provided; the community requests register provides more data than the grievances register. There are minor differences, also, in presentation, for example, the community requests register includes a column with a heading: 'Date of request' (*Date de la demande*) whereas the grievances register only provides the date in the first cell of each row (more difficult for a 'new' reader to interpret).

A comparison of the current structures of the two registers shows a common weakness; one which is more pronounced in the grievance register. Neither register presents a clear summary of action/s taken to address/respond to a grievance or a request for assistance. The 'Notes' column of the *doléances* register does contain such information, but not for all requests for assistance. The grievance register has no equivalent column, so such information is not provided. It is recommended that both registers are amended to include a column to capture this information.

The grievances register indicates clearly whether a grievance relates to the railway (but not necessarily to the MUOA Project); whereas in the case of the community requests register, the only way of identifying whether a request is linked to the railway (and potentially to the MUOA Project) is by analysing the names of the CBG entities responsible for addressing the request (CFB or '*Projet Multi-User*'). Overall, the IESC notes that efforts are continuing to improve the recording and management of the grievances and community requests for assistance.

### 5.6.1 Grievances (2019)

As of 31 December 2019, CBG had received 29 grievances (8 more than recorded in the IESC's July 2019 Monitoring Report) related to environmental and social issues. Most grievances were raised in relation to the mine site and the railway (48% for each). The grievances mostly arose from construction and/or maintenance work (55%) and mining operations such as stripping (38%). In terms of grievance topic: 62% of grievances were linked to economic impacts, 24% to safety, 10% to the environment and 3% to utility services.

Of the 29 grievances, 28 were closed. The single open grievance related to a fire along the railway, allegedly caused by railway-maintenance activities, which damaged agricultural assets. The AMR states that a resolution for this grievance was expected by the end of May 2020 (see Section 5.9.2 below).

Three key actions, taken to close-out grievances, are presented below with the proportion of grievances closed out by each action:

- Payment of cash compensation (50%);
- Provision of in-kind compensation (39%); and
- Investigations providing information showing that the grievance was unfounded (11%<sup>7</sup>).

Six grievances were not closed out until 2020 and the time taken to reach closure ranges from 5 to 11 months. A few of the remaining 23 grievances were closed out quickly, but many took between 3 to 6 months.

In its July 2019 Monitoring Report, the IESC records that there were three open grievances; one dating back to 2016 and two from 2018. The AMR does not record closure of pre 2019 grievances. The IESC understands that the AMR template will be amended for 2020 onwards and

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<sup>7</sup> Percentages rounded up.

that future AMRs will record the status of all grievances which are open at the end of the preceding year.

#### 5.6.2 Grievances (Up to 30 June 2020)

As of 30 June 2020, CBG had received 28 grievances; almost the same number as in 2019. Twenty-five grievances came from complainants in the mine area and, of these grievances, 14 related to quality of housing/infrastructure at the new Hamdallaye village site arising from the move of the residents from the old village site to the new site. Only 4 grievances have been closed-out.

For approximately half of the open grievances, most of which relate to the Hamdallaye move, discussions are continuing toward resolution. Also, CBG has prepared and is implementing, a schedule for additional construction works at the new village site as part of its efforts to resolve these grievances. Of note, the IESC consider that the schedule focuses upon physical and social infrastructure although there are elements relating to domestic structures (finishing/cleaning).

Twenty-one percent of grievances relate to damage to crops, almost all of which are cashew trees. For these grievances, CBG will pay cash compensation and the compensation 'dossiers' for the complainants are in the process of being prepared. The remaining grievances, with one exception, are expected to be resolved by means of payment in-kind and, again, these grievances are being addressed currently. The one exception, submitted by a community near Boké with respect to damage to crops, has entered a judicial process and a court decision will decide the outcome.

The single open grievance<sup>8</sup> carried over from 2019 and expected to be closed-out by end of May 2020, was still open during the early part of the VSV June 2020. Soon after the VSV, CBG confirmed that the compensation payment was made on 17 July 2020 and the grievance was closed on 30 July 2020. This grievance is recorded as being received by CBG on 19 February 2019; thus, it was open for 17 months. This length of time, without close-out, is a concern. Although, not so concerning yet as the grievance described above; the situation in 2020 (only 4 out of 28 grievances being closed-out) requires a concerted effort, particularly by ensuring a quick and effective implementation of the schedule for additional construction works at the new Hamdallaye village site; especially with regard to domestic structures (houses, kitchens and toilets) (see, also, Section 9.2.1 below).

CBG has taken action to improve the management of the grievance assessment and to expedite the close-out process. Most notable are:

- Weekly review by the HSECQ Director of the community grievances tracking action plan; and
- An HSECQ Monthly Committee Meeting which focuses on *inter alia*:
  - Review of complaints;
  - Discussion of 'blockages' to grievance close-out; and
  - Possible solutions.

The HSECQ Monthly Committee Meeting is now regularly attended by the Director-General (DG) This is an important factor as the DG is able to facilitate collaborative working and co-orientation of actions across all internal functions, to ensure that CBG is not the main 'bottleneck' preventing early grievance close-out.

During the VSV, a discussion on blockages and grievance recording occurred. CBG experiences community blockages, from time to time, where communities place barriers preventing CBG

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<sup>8</sup> Grievance raised by the community of Diarabaka concerning a fire which damaged plantations. The community considers that the fire resulted from work on the railway being undertaken by a maintenance crew.

access to certain areas or take action/s to prevent CBG works from occurring. The reason why blockages *per se* are not recorded as grievances was explored. The CR Manager and CR Superintendent explained that some blockages occur in situations where communities act to prevent what they see as potential damage to their interests occurring, while they wait for CR personnel to arrive (for example, if a community sees earth-moving equipment arrive on village land and they are not aware of CBG's intentions, then community members think they need to act quickly to prevent work until CBG's CR personnel arrive and explain the situation). Some blockages can be resolved quickly 'on the spot' after the arrival of CR personnel. However, if a specific blockage is not resolved quickly and there is 'grievance' behind it, then those who consider themselves to be the affected party are encouraged to submit a grievance; in case the affected party does not submit a grievance then CBG will record it anyway. It was noted that blockages are recorded in the Stakeholder Engagement Register and Minutes of Meetings relating to blockages are maintained.

The discussion of blockages demonstrated that there are still occasions when communities are not informed about future works on their territory. Earlier and more effective communication between those internal CBG departments, that manage operational activities in the Concession area, and the CR section is required to avoid, or at minimum, reduce the frequency of situations that cause blockages to occur.

Reviewing the number of grievances received over the past five years shows a high of 45 grievances in 2015 with a decline to 5 in 2017. In 2018, there were 10 grievances and in 2019, 29 grievances. The number for 2020 up to 30 June is 28 grievances (possibly inflated due to the Hamdallaye village move; a 'non-typical' event and one very likely to generate grievances). These figures do not indicate a trend of increasing levels of community-level concerns about CBG operations over the past 5 years. This may be due to several factors, but it is a little surprising as land acquisition activities have been increasing over the past 2 years. In parallel, again over the past 2 years, the IESC has seen evidence of an increase in community concern beginning with a report issued by Human Rights Watch (2018) and culminating in the complaint, by 13 communities plus 3 NGOs, submitted the IFC Compliance Advisor Ombudsman (CAO) and accepted, in March 2019, by the CAO as being eligible for assessment. This 'internationalization' of complaints may indicate one or more weakness in CBG's grievance management. In addition, the IESC has noted in previous monitoring visit reports, that there have been long delays, on some occasions, in closing out grievances (in some cases more than 1 year). The IESC recommends that CBG takes action to 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 recognising the legitimacy of grievances and then implementing the actions to close them as quickly as possible.

### 5.6.3 Legacy grievances

In the IESC's July 2019 monitoring report, there is an account of 3 open legacy grievances (1 grievance from 2016 and 2 grievances from 2018). One of the 2018 grievances (concerning a fire affecting cashew trees at Bhoundouwadé) has entered a judicial process and both the procedure and outcome is now outside CBG's control. In July 2020, CBG had received no information on the status of the grievance. The other 2018 grievance (raised by the villages of Fassaly Foutabhé and Fassaly Belenderé regarding pollution of a watercourse) was closed in May 2020.

The 2016 grievance concerns the closure/rehabilitation of a quarry at Bintimodia. In early March 2020, the Bintimodia commune sent an official letter to CBG stating its wish to have the road of Bintimodia rehabilitated instead of the closure of the quarry. CBG began work to rehabilitate the road (22 km), but work was suspended due to the rainy season. The road rehabilitation is

expected to be completed by the end of December 2020. This grievance remains open, but it is encouraging that work is progressing to achieve closure by the end of 2020.

### 5.7 Community requests for assistance (doléances) (2019)

At 31 December 2019, 25 requests for community assistance were received; mostly from the mine area (19) with the remainder from the rail area (6). 52% of community assistance requests were related to the opening and/or rehabilitation of community roads, whereas 20% were related to the construction of basic social infrastructure (drilling of wells, schools, health centres), 16% to employment opportunities and 4% to the environment and 8% to other categories.

The AMR records the following data regarding the status of the 25 requests for community assistance:

- Twelve requests for community assistance were closed after CBG actions;
- Eight community assistance requests, especially those related to the construction of basic social infrastructure, were presented to local government authorities (with CBG engaging with the communities to explain the respective roles of CBG and local government in the provision of social infrastructure); and
- Five community assistance requests are "...being addressed".

### 5.8 Community requests for assistance (doléances) (Up to 30 June 2020)

During the period 01 January to 30 June 2020, 15 requests were received by CBG. The breakdown of these request by area shows a more even split than the 2019 requests (6 from the mine area; 5 from the railway and 4 from the port). As for the 2019 requests, most request relate to improvement to local roads and to social infrastructure and delivery of utility services. Up to 30 June 2020, the status of the requests was as follows:

- Five requests were closed (one request was refused, and the others closed following CBG actions);
- Five requests were in being acted upon by CBG; and
- Five requests were re-directed to local government. Local government being considered by CBG as the appropriate entity to consider and then act upon the request, if accepted. One request was rejected by CBG (a request from the Boké mayor's office [*mairie*] for CBG to provide a 200 kVA generator).

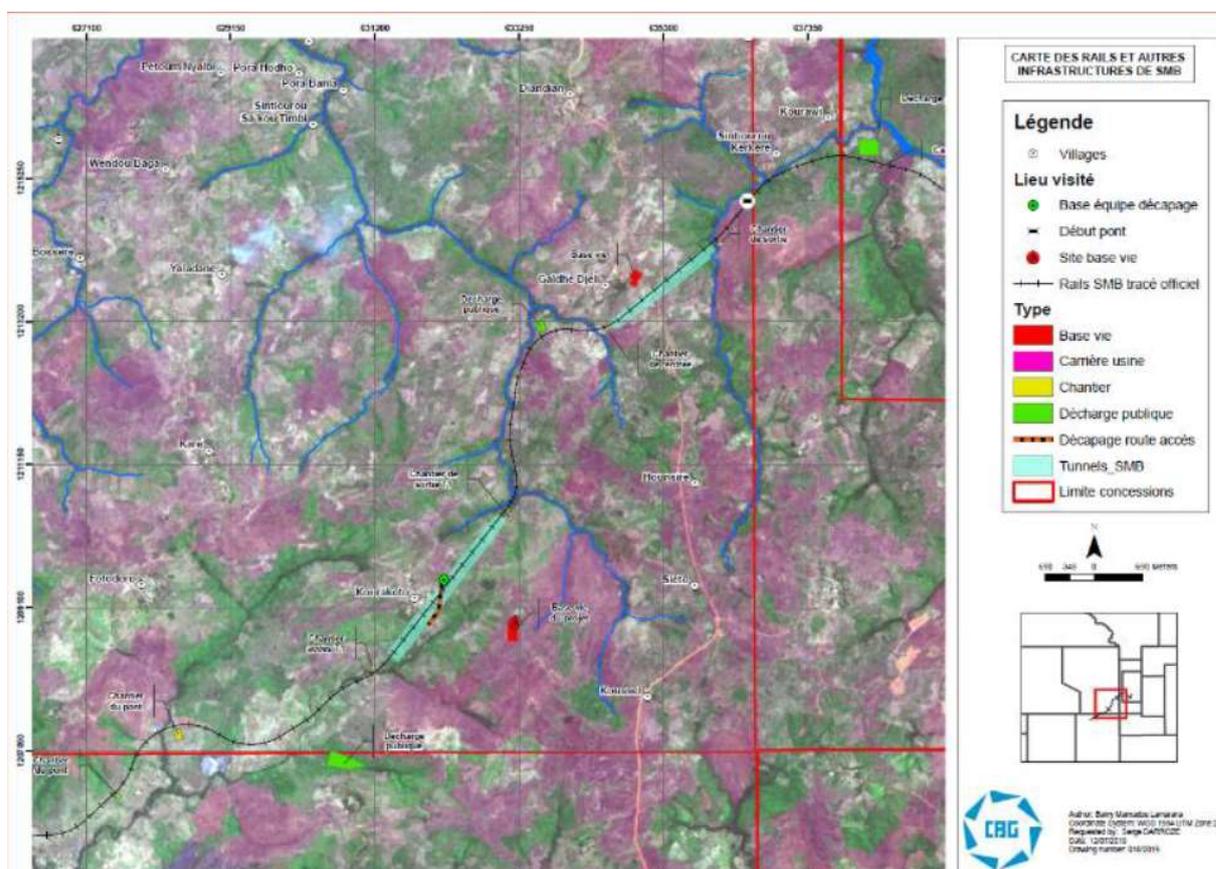
With respect to requests re-directed to local government, The IESC observes that the date of transfer is not recorded in the register and that the specific identity of the local government entity is not always provided. It is suggested that such information is provided in the register in the future.

### 5.9 SMB-W Railway

SMB-Winning (SMB-W) has been granted permission by the Government of Guinea (GoG) to construct a 135km railway, and associated tunnels, roads and camps, linking the SMB concession to the CHALCO concession, in order to transport bauxite. Of the overall route, approximately 10km will traverse the South East portion of CBG's South of Cogon concession. The railway is shown in Figure 5-3 below in which red lines indicate concession boundaries, light blue areas are tunnels and red areas are construction camps.

CBG has been instructed by the GoG to host the railway and has agreed, in July 2019, a Memorandum of Understanding [*Protocol d'Accord*] with SMB-W and GoG (represented by the Ministry of Mines and Geology and the Ministry of Environment, Water and Forests) that requires implementation of CBG standards for activities undertaken in the CBG concession, including application of IFC Performance Standards. CBG does not have power of enforcement over SMB-

W; instead this is vested in BGEEE. Thus, whereas CBG can inspect SMB-W practices and E&S performance, it can only report its findings to BGEEE and encourage BGEEE to take any actions necessary. Therefore, CBG is following a process of inspection, dissemination of results to SMB-W and reporting to BGEEE whilst at the same time seeking, via a collaborative approach with SMB-W, to encourage SMB-W to implement the corrective actions identified by CBG.



**Figure 5-3: SMB-W railway located in South East corner of CBG's concession**

Construction of the SMB-W railway commenced in September 2019 and was scheduled for 18 months (expected to be completed in the early-mid 2021). Inspections were bi-weekly following the onset of construction but stalled as a result of in-country COVID-19 travel restrictions in March 2020. A multi-disciplinary team from CBG, including social and biodiversity representatives, participated in each inspection. The scope of the inspections is set out in a checklist as follows:

- Physical Environment;
- Community Relations;
- Biodiversity;
- Health and Safety; and
- Other Observations.

CBG's efforts have resulted in several positive results such as provision of workers' toilets, avoidance of tree felling, improved sewage effluent management, erosion control, maintenance of hydrology, and provision of waste timber to communities. However, CBG has reported some poor practices, for example, relating to a lack of controls to discourage population influx and failure to prevent the increased incidence of bush meat sales, noting camps are in ecologically

sensitive locations (See Figure 5-4). At the time of the VSV, 67 actions had been identified for action by SMB-W of which 41 had been closed out with the remainder yet to start or being implemented.

Two temporary construction camps located in CBG's concession are housing Chinese nationals and non-local Guineans. CBG can access the camps but has not inspected the facilities (due to COVID-19 concerns) and has not assessed conditions against Performance Standard 2, including workers' accommodation/working conditions.



**Figure 5-4: Examples of new dwellings/shop near the SMB camps indicating localised influx**

The IESC recognises the good work CBG is doing to enhance performance at the SMB-W sites but recommends further consideration is given to compliance against PS2, Labour and Working Conditions. In particular, CBG should endeavour to inspect workers' camps and living conditions, and speak to workers about physical and contractual conditions, once COVID-19 restrictions are removed.

Information on biodiversity issues, arising from SMB-W inspections, is provided in Section 10.4.

### **5.10 New COBAD road**

CBG monitoring is continuing with its environmental inspection programme of the COBAD Road (see earlier IESC monitoring reports). During the VSV, CBG referred to a 'new' COBAD Road, which is, essentially, a new road which connects to the existing COBAD Road in the north of CBG's concession area. The new road extends for only 2km within CBG's concession and was subject to the Land Disturbance Permit Procedure and to the current bi-weekly inspections.

The IESC has reviewed evidence from a walk-over survey as part of the route selection process and can confirm that the selected route traverses bowal and was selected to avoid ecological receptors, sites of cultural heritage interest and villages. However, there is some unavoidable impact on community assets, for example, minor land take. Mitigation measures, consistent with those applied elsewhere within the CBG concessions are to be applied. The IESC has no specific concerns at this time; however further updates for this road will be sought in future IESC monitoring visit and the IESC may wish to visit the new road during forthcoming site visits.

### **5.11 Contractor management**

CBG has an approved Contractor Management Plan (CMP) in place since January 2019. Through the implementation of the CMP, CBG commits to:

- Include binding clauses in future contracts relating to E&S management plans;
- Evaluate HSEC performance during award evaluation process and eliminate contractors with poor HSEC practices at the bid stage; and
- Review contractors' documentation/management systems prior to mobilisation.

CBG has reported there was little progress in 2019/early 2020, but that more recent contracts reportedly do include more detail relating to E&S elements and requirements placed upon the contractor (in addition to H&S). Contractors will also receive the CMP and the LDP plus associated documentation.

The IESC is currently seeking to review a recent contractual agreement to confirm inclusion of all relevant HSEC requirements, as required by the CMP, are binding. The IESC has requested a copy of a redacted version of the Dredging contract (Contrat N° S923-3481-00) but had not received the contract at the time of writing this draft report. The IESC will follow up on this issue as part of its ongoing monitoring programme and, also, revisit it in subsequent reports

**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>
July 2020_001	HSECQ resources - Environment Manager	The post of Environment Manager has been vacant since January 2020. This vacancy is having a significant impact on the timely implementation of environmental action plans and affecting oversight and direction of the Environment Team with subsequent impacts on environmental performance.	All	Recruitment of an experienced Environment Manager to be a priority and an appointment made at the earliest opportunity.	<b>High</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.	All	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.	<b>Moderate</b>
July 2020_003	E&S Management Plans	The implementation of the Action Plans (embedded within the Management Plans) is, in most cases, significantly behind the schedules proposed by CBG.	All	Convene a multi-disciplinary working group to assess the need to amend specific Action Plans and recommend any required changes focusing upon i) duplication of actions between plans, ii) feasibility of implementing certain actions and iii) preparing revised timeframes as appropriate, in light of progress to date and uncertainties such as COVID-19. Also, these changes be made cognizant of short-term priority actions and CBG’s commitment to bring current operations up to a level consistent with the intent of the IFC Performance Standards by January 2024. Lenders must be informed of revisions in accordance with the MoC Procedure.	<b>Moderate</b>
July 2020_004	SMB-W railway	Several poor practices have been identified at SMB facilities that are encouraging influx and	N/A	Additional consideration to be given to compliance against PS2, Labour and Working Conditions, in	<b>Moderate</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		sales of bushmeat. In addition, CBG inspections have resulted in anecdotal evidence of poor working conditions.		CBG inspections. In particularly, CBG to consider influx, endeavour to inspect workers' camps and conditions, and speak to workers about contractual conditions, as soon as travel restrictions permit.	
July 2020_005	CR and Resettlement Teams' staffing levels and access to external assistance	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 Project, the IESC considers that it is appropriate to restate and update its main staffing recommendation, presented in its July 2019 monitoring report.	All	<p>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 Guinea and other West African countries (benchmarking).</p> <p>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.</p>	<b>High</b>
July 2020_006	CR and Resettlement Teams' capacity and resources	The Time-bound Recruitment Plan requires a mechanism to be in place to deploy, effectively, all personnel and resources in the future.	All	Prepare and implement a time-bound Capacity Development and Resource Acquisition Plan (2021 to 2024). This Plan to include inter alia: acquisition/provision of adequate technical resources (such as GPS handsets, digital platform/s and vehicles), training in the use of equipment and the digital platform/s, and establishment of a continuing professional development procedure focusing on provision of training.	<b>High</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
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.	Operations	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).	<b>Moderate</b>
July 2020_008	Community Grievances	Continuing lengthy delays in closing out certain grievances	Operations	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.	<b>Moderate</b>
July 2020_009		Neither the community grievances ( <i>plaintes</i> ) and community requests for assistance ( <i>doléances</i> ) registers present a clear summary of action/s taken to address/respond to a community grievance or a community request for assistance.	Operations	Both the community grievance ( <i>plaintes</i> ) and community requests for assistance ( <i>doléances</i> ) registers to be amended to include a column to capture summary of action/s taken to address/respond to a community grievance or a community request for assistance.	<b>Low</b>

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

### 6.1 Introduction

The VSV focused upon 4 topics:

- Occupational health and safety (including COVID-19 measures);
- Design and management of temporary worker's accommodation;
- Employment and employees; and
- Phase 1 Expansion Project: worker demobilisation.

Key findings are presented on each of these topics below.

### 6.2 Occupational health and safety

6.2.1 Several standard KPIs were presented in the AMR and updates provided during the VSV. The data presented for 2019 in the AMR indicate zero fatalities for both the Phase 1 Expansion Project and the other operations. There were, however, 210 Lost Time Injury (LTI) days for operations in 2019 that relate to 4 separate incidents compared with 40 lost days in the previous year. The Expansion Project reported 1 LTI for 2019 and 2 LTIs for 2020 year-to-date (June 2020) .

More recent H&S performance data were presented during the VSV for the period January to end of June 2020. Fatalities are recorded as zero, LTIs at 2 and recordable injuries at 5. Overall, the Total Recordable Injuries Frequency Rate (TRIFR) is below target as is the Total Injuries Frequency Rate (TIFR) based on 3- and 12-month rolling averages.

The KPI figures above exclude a serious LTI incident at the port as reported in August 2020 (post the VSV). A detailed report for the incident is currently being prepared; the IESC will follow up once the incident report is made available. The IESC notes this is the second serious incident in a two- year period and, therefore, recommends the HSECQ Department undertake a comprehensive safety audit and assess the health and safety culture at the port.

#### 6.2.2 Falling rocks from tippler

In the July 2019 site visit report, the IESC reported evidence of falling rocks from the tippler (within the primary crusher station). The findings represented a significant safety concern requiring intervention by CBG. Access to high risk (drop zone) areas was restricted and in October 2019 repair works undertaken to increase the height of a retaining wall intended to prevent rocks 'leaking' around the retaining wall and falling from height as the tippler rotates. CBG has reported that the corrective works have been largely successful, although a small number of rocks continue to leak around the wall. Thus, further remediation work is planned to stop leakage of rocks, with access restrictions remaining in place until works are finalised and the effectiveness of further measures is confirmed.

#### 6.2.3 Incident reporting/corrective actions

CBG reported two train derailments in February and March of 2020. The occurrence of two derailments in a short period of time prompted the IESC to question the safety of the track and, in accordance with its incident investigation procedure, CBG responded with several corrective actions aimed at preventing further derailments. Measures that have been put in place/are currently underway include a wheel impact device (to detect imperfections in the wheels); additional maintenance staff; procurement of a new ballast compactor; repositioning of existing derailment detectors and procurement of new derailment detectors (due Sept 2020).

Improvement works are current 73% complete (at the time of the VSV) and broadly running to schedule.

#### 6.2.4 COVID-19

During the VSV, the IESC was informed that there were 22 confirmed COVID-19 cases in the CBG workforce, and all had recovered. CBG has taken swift measures to manage COVID-19. Organisationally, the following actions have occurred:

- Establishment of an "Infectious Diseases" Management Committee;
- Appointment of a COVID-19 Lead Manager;
- COVID-19 communication plan in place:
  - Radio-based awareness campaigns, posters, pamphlets and deployment of company medical staff to inform employees;
  - Internal meetings led by heads of departments to raise employees' awareness; and
  - Situation updates on CBG's intranet in daily basis

A wide range of measures have been introduced to protect workers and control transmission of the virus including, *inter alia*:

- Temperature monitoring deployed in all CBG facilities (about 70 control points) with thermo-flash or facial camera;
- A protocol for travellers returning from high risk areas has been developed, it is prohibited for all employees to visit active areas, a check list to determine infection risk is in place;
- Employees returning from a mission or leave from a city outside of Kamsar are quarantined for a minimum of 14 days and subject to appropriate follow-up. At the end of the isolation period, a medical check must be carried out before starting work;
- Temporary adjustment to sick leave procedures to allow staff with mild symptoms to stay away from work without financial penalty;
- Containment of the suspect patient in a zone reserved for COVID-19 cases and medical treatment on site if necessary;
- Isolation centre has been designated in Kamsar and Sangarédi;
- Emergency phone numbers put in place for workers to report suspected symptoms;
- Compulsory wearing of face masks; and
- Rules regarding social distancing for meetings and vehicular transport.

Collectively, all these measures protect not only workers, but also their families and communities.

### 6.3 Employment and employees

The AMR records that during 2019, CBG reviewed and revised, as necessary, the following documents to ensure alignment with the Lender requirements:

- The HR Policy: Working for CBG, Policy No. 13/72/04, Rev 2;
- The Retrenchment Procedure for National Personnel; and
- The HR Manual.

The IESC confirms that the HR Manual was reviewed by the IESC (and Policy Lenders) in Q3 2019 and comments provided to CBG. CBG revised the HR Manual and sent the revised version, with the first version of the Workers' Grievance Mechanism, to Lenders/ IESC in May 2020. Again, Lender/IESC comments were provided to CBG (01 June 2020) and the final version of the HR Manual and the Workers' Grievance Mechanism was expected to be completed shortly afterwards.

In May 2020, the IESC was informed that the Code of Ethics and Business Conduct (also a Phase 1 Expansion Project ESAP item) was finalized and was proceeding through the internal CBG approval process.

During the VSV, a meeting was held with senior personnel from the Human Resources Department and the Compliance function. The IESC requested a status update on the:

- The HR Manual;
- The Workers' Grievance Mechanism (*Procédure de gestion des réclamations et revendications des salariés*, Rev00, dated 28 January 2020); and the
- Code of Ethics and Business Conduct.

The IESC was informed that the HR Department had not received the Lender/IESC comments, sent on 01 June 2020, and, therefore, the status of the HR Manual and the Workers' Grievance Mechanism was unchanged. Also, as these two documents had not been finalized, no dissemination to workers/contractors had occurred.

The situation with respect to the Code of Ethics and Business Conduct was confirmed and a copy of the revised Code was shared 'on screen' with all meeting participants. Essentially, the current version of the Code was to be discussed at a forthcoming internal meeting and, following this meeting and assuming no major issues arose, the Compliance Manager expected to be able to share the revised Code with Lenders/IESC in the near future.

### 6.3.1 Workers' Grievance Mechanism

During the late November/early December 2018 monitoring visit, the operation of workers' grievance mechanisms was investigated during a meeting with the (then) Fluor Industrial Relations Manager. At that time, Fluor was a key contractor for the Expansion Project Phase 1. The investigation identified some weaknesses in the operation of workers' grievance mechanism/s at the contractor/sub-contractor levels. Therefore, the IESC recommended that CBG require all its contractors, with immediate effect, to reinforce the message to both its own staff, and to sub-contractors, that there is a CBG procedure whereby workers can submit grievances.

Subsequently, Lenders extended this recommendation after visits to two contractor sites and interviews with workers during the July 2020 monitoring visit and included the revised recommendation into a Corrective Action Plan (CAP) attached to the Waiver Request of 19 September 2019. Thus, the CAP requires that,

*"CBG shall provide evidence of the dissemination of CBG's workers grievance mechanism to contractors' workers, including specifically those working on the MUOA project. The information provided shall include:*

- *A dedicated telephone number for workers to submit their grievances;*
- *Clearly assigned responsibility of designated staff;*
- *Emphasis that anonymous grievances can also be raised; and*
- *Grievance boxes should be installed in worksites."*

As stated in the IESC's MUOA ESDD Report Addendum (July 2020), the IESC confirmed on 22 January 2020, to CBG, that the Lenders/IESC accepted the Workers' Grievance Mechanism text (CBG had prepared a contractor-focused Workers' Grievance Mechanism) and confirmed that the visual evidence of dissemination, provided by CBG, met the CAP requirement.

At approximately the same time, CBG prepared a CBG-focused Workers' Grievance Mechanism (*Procédure de gestion des réclamations et revendications des salariés*, Rev00, dated 28 January

2020). This document was reviewed by Lenders/IESC in Q2 2020, but as confirmed by CBG during the VSV of July 2020 it has not been finalised or disseminated.

Thus, as of July 2020, CBG has a contractor-focused Workers' Grievance Mechanism (MUOA contractors specifically) which is approved and a CBG-focused Workers' Grievance Mechanism which is not approved; in fact, not yet finalised). Essentially, almost 5 years after the ESAP was prepared, there is no PS-2 compliant Workers' Grievance Mechanism that covers CBG employees and/or contractor workers (when contractors do not have their own PS2-compliant Workers' Grievance Mechanism). This is an unfortunate situation, given the work that has been directed at preparing both Worker Grievance Mechanisms, and requires immediate remedial action. The IESC recommends that CBG acts to:

- Finalise the CBG-focused Workers' Grievance Mechanism (and to include a statement that it applies not only to direct employees, but potentially also to contractor employees if the contractor does not have a compliant Workers' Grievance Mechanism); and
- Ensure that, during the process of appointing contractors, CBG checks that contractors have a PS2-compliant Workers' Grievance Mechanism and, if not, requires the adoption and implementation of the CBG Worker's Grievance Mechanism by the contractor (in line with section 6.5 of the Contractor Management Plan).

Once the Workers' Grievance Mechanism is approved, CBG to disseminate it to all CBG personnel and all its contractors, needed for its core business processes (as defined by PS2), for adoption by all contractors that do not have a PS2-compliant Workers' Grievance Mechanism. CBG and Contractors will reinforce the message to both their own staff members, and in the case of contractors to sub-contractors, that CBG operates a procedure whereby workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.

In its July 2019 monitoring report. The IESC made the following recommendation,

*"Once the HR Manual is in place, the HR Director to prepare a brief implementation action plan to ensure that CBG will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This action plan to include capacity-building for key staff and, as necessary, revision to existing functional responsibilities."*

As the HR Manual is not yet finalised, it is not feasible to prepare an implementation action plan to ensure that CBG will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This recommendation remains in place.

#### **6.4 Design and management of temporary workers' accommodation**

The ESAP for the Phase 1 Expansion Project requires the preparation and implementation of a Worker Accommodation Design Plan. In late 2016, CBG issued the first draft of this Plan (Rev0 of 2016/11/03) which sets out the criteria and standards to be used to construct and manage worker accommodation. Most of these criteria/standards were taken from the IFC/EBRD (2009) *Workers' Accommodation: Processes and Standards Guidance Note*), as determined by the IESC's review of this Plan. Events on the ground overtook the Plan as the Phase I Expansion Project worker accommodation was not only constructed but was occupied by workers, before the Plan was finalised<sup>9</sup>. Currently, the Kamsar accommodation is used, periodically, for operational purposes, while being kept ready to receive workers expected to be employed for the Phase 2 Expansion Project.

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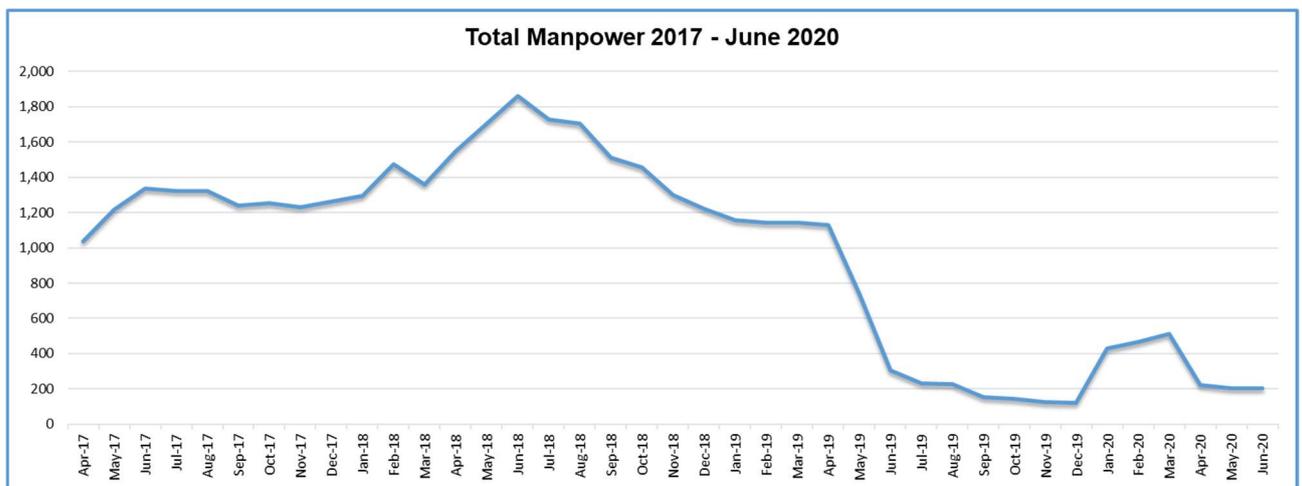
<sup>9</sup> During the November 2016 monitoring site visit, two worker accommodation 'camps' were visited and, overall, were found to be aligned with internationally recognised requirements.

At the time of the July 2019 site visit, CBG had not issued a Rev1 version of the Plan for IESC/Lender review. Lack of a Rev1 version was not considered to be a material issue by Lenders/IESC at that time (no new accommodation being designed or constructed). However, the IESC stated, in its July 2019 monitoring report, that the, "...Plan will need updating, approval and re-issue prior to the construction of any new accommodation facilities for workers, for example, during future expansion phases"

Immediately prior to the VSV, CBG issued a revised version of this Plan for Lender/IESC review. Lender/IESC comments were sent to CBG toward the end July 2020. It is expected that the Plan can be finalised quickly and this ESAP item closed.

**6.5 Phase 1 Expansion Project: Demobilisation of Workers**

The AMR records that, at the beginning of 2019, the number of workers (almost entirely contracted workers) was 1,068 and stayed at that level during Q1 2019 (the peak of almost 1900 workers was reached in July 2018). The number of workers decreased significantly between May and August as construction effort reduced and only workers involved in commissioning were employed on site. In September 2019, Fluor (EPC) started to demobilise and, as shown in Figure 6-1, by December 2019 the number of workers 'on-site' was probably just over 100. Between January and March 2020, numbers increased to a peak of ~500 due to the need for workers to manage the Phase 1 Expansion Project 'punch-list' and to construct houses for permanent workers. In April 2020, there was a decline in workers to a level of ~200 and this figure has reduced further to 42 workers during June 2020 (due to COVID-19 effects) The remaining workers are involved in housing construction (June 2020). There are 3 contractors for the housing and 1 contractor acting in a supervisory role. It is recommended that CBG prepares a Worker Demobilisation Plan and then a Demobilisation Close-out Report for the Phase 1 Expansion workers to be demobilised and who are still employed to construct houses. The Plan must include a requirement for CBG to undertake an audit of the supervisory contractor's procedure, and accompanying documentation, for managing the demobilisation process. [Post meeting Note: CBG has informed the IESC that, as of mid-September 2020, there are 37 CBG 'employees' working on Phase 1. Of these, 15 are permanent CBG workers who will be retained and 12 are on fixed-term contracts and some, if not all of them, may be retained. The remaining 10 workers consist of 3 expats and 7 secondees from other employers. Very limited, if any, demobilisation will occur].



**Figure 6-1: Expansion Project Phase 1: Total Manpower April 2017 to June 2020 by month.**

During the VSV, a meeting was held with the 'Chef Service Projet Extension' concerning the management of the Phase 1 worker demobilisation (most of which occurred in the period March

to December 2019). Demobilisation was managed by Fluor, the EPCM Contractor, working to 'Guidelines' developed jointly with CBG [*Post-VSV Note: these 'Guidelines' were received by the IESC and the document is entitled 'Plan de Gestion des Relations Industrielles' (Industrial Relations Management Plan) and the version received is dated 08 August 2017. There is a section on demobilisation, but it has a focus on disciplinary measures<sup>10</sup>*].

The *Chef Service Projet Extension* was not aware of any grievances raised by workers concerning demobilisation issues. However, as worker grievances were managed either at contractor/sub-contractor level or, following escalation by Fluor; it is quite possible that there were grievances raised and closed-out before final escalation to CBG. However, the IESC has no evidence that this is the case. As a rule, only a few 'key' grievances were escalated to Fluor (See IESC's December 2018 monitoring report). It seems likely that very few would have been escalated to CBG from Fluor.

In its December 2018 monitoring report, the IESC noted that Fluor audited its contractors regularly; however, it also noted that CBG did not audit Fluor in relation to labour and working conditions issues. Since then, it seems little has changed as the *Chef Service Projet Extension* was not aware of any audit of Fluor's management of the demobilisation process.

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<sup>10</sup> The *'Plan de Gestion des Relations Industrielles'* appears to be a French language version of the Industrial Relations Management Plan seen by the IESC during the December 2018 IESC monitoring site visit.

**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>
July 2020_010	H&S incidents	There was a second serious accident at the port (two such incidents have occurred in the past two years), which would appear to have been readily avoided if safe practices had been employed.	Operations	A comprehensive safety audit of port operations and an assessment of the health and safety culture is needed. Remedial actions should be put in place should the audit reveal any shortcomings.	<b>Moderate</b>
July 2020_011	Workers' Grievance Mechanism	There is no PS-2 compliant Workers' Grievance Mechanism that covers CBG employees and/or contractor workers (there is an approved Workers' Grievance Mechanism, for MUOA contractors, and a draft CBG-focused Workers' Grievance Mechanism).	All	CBG acts to: <ul style="list-style-type: none"> <li>• Finalise the CBG-focused Workers' Grievance Mechanism (and to include a statement that it applies not only to direct employees, but potentially also to contractor employees if the contractor does not have a compliant Workers' Grievance Mechanism); and</li> <li>• Ensure that, during the process of appointing contractors, CBG checks that contractors have a PS2-compliant Workers' Grievance Mechanism and, if not, requires the adoption and implementation of the CBG Worker's Grievance Mechanism by the contractor (in line with section 6.5 of the Contractor Management Plan).</li> </ul>	<b>Moderate</b>
July 2020_012	Workers' Grievance Mechanism	There is no PS-2 compliant Workers' Grievance Mechanism that covers both CBG and contractor workers (there is an approved Workers' Grievance Mechanism aimed at contractors and a draft CBG-focused Workers' Grievance Mechanism).	All	Once the Workers' Grievance Mechanism is approved, CBG to disseminate it to all CBG personnel and all its contractors, needed for its core business processes (as defined by PS2), for adoption by all contractors that do not have a PS2-compliant Workers' Grievance Mechanism. CBG and Contractors will reinforce the message to both their own staff members, and in the case of contractors to sub-	<b>Moderate</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				contractors, that CBG operates a procedure whereby all direct and contracted workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.	
July 2020_013	Worker demobilisation	The final demobilisation period of the Phase 1 Expansion Project will occur soon.	Operations	CBG to prepare a Worker Demobilisation Plan and a Demobilisation Close-out Report for the remaining Phase 1 Expansion workers to be demobilised and who are still employed to construct houses. The Plan must include a requirement for CBG to undertake an audit of the supervisory contractor's procedure, and accompanying documentation, for managing the demobilisation process.	<b>Minor</b>
July 2020_014	Contractor/Sub-contractor labour and working conditions (LWC) management	CBG only applies, currently, a passive management approach to LWC management of contractors and sub-contractors.	All	Once the HR Manual is in place, the HR department to prepare a brief implementation action plan to ensure that CBG will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This action plan to include capacity-building for key staff and, as necessary, revision to existing functional responsibilities.	<b>Moderate</b>

## 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 section. These include plans relating to air quality, water quality, noise and vibration, resource use and energy efficiency, waste management and hazardous materials management.

As a general observation, the implementation schedule specified in the plans (dated January 2019) are to a greater or lesser degree all behind schedule. The IESC acknowledges several mitigation circumstances including; COVID-19 travel restrictions and the resignation of the Environmental Manager in January 2020. The IESC also believes, with hindsight, that the original schedules set by CBG were overly ambitious. Nevertheless, despite the mitigation factors, more progress should have been made. See Item July 2020\_004.

### 7.2 Air Quality

#### 7.2.1 Finalisation of the Air Quality Management Plan

An Air Quality Management Plan (AQMP) was prepared in January 2019, however the plan did not specify stack emission criteria for the dryer stack<sup>11</sup> in Kamsar. An agreement was made between CBG and Policy Lenders to revise the AQMP based on stack emission limits that would be agreed with the Policy Lenders, noting that EHS General and Industry Sector Guidelines do not provide in-stack emissions limits that can be applied to bauxite dryers. It was therefore agreed that feasible limits were to be based on measured stack emission data, including data for the new dryer (Dryer 4)<sup>12</sup>, and refined ambient air quality predictions validated by empirical ambient air quality data where possible. Responsibility for revision of the AQMP rested with CBG's Environment Manager.

Following delays and technical problems encountered during the sampling of the stacks in 2019, the revision of the AQMP became the subject of a waiver that specified the revision and finalisation of the AQMP by the end of 2019. This extended timeline also proved unachievable for the reasons described later in this section.

CBG developed a phased stack emission sampling programme to gain representative stack emissions for each dryer during a range of operating conditions as follows:

- a) A dry season sampling campaign for Dryers 1-3 performed from February through to April 2019 over a 43-day period; and
- b) A wet season sampling campaign for Dryers 1-3 was initially planned for September 2019 and then rescheduled for November (end of the rainy season). The second campaign was conducted from the 22<sup>nd</sup> November 2019 over a period of 12 days when conditions/the bauxite was reportedly wet.

Preliminary analysis of the first sampling campaign identified several technical problems with the sampling as reported in the IESC's July 2019 site visit report. Further sampling campaigns were

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<sup>11</sup> A single stack is used by the existing three dryers

<sup>12</sup> [Testing of dryer 4 has revealed it cannot operate at the original throughput level of 1500tph presented in the design specification. Modifications made in early 2020 have improved the throughput, although the throughput, at 900tph, still remains well below the design specification. Additional modifications have been proposed that are under evaluation by CBG's engineering department. Thus, the final design and timeframes for further modifications are not yet confirmed. CBG has confirmed the three dryers plus dryer 4 will be sufficient for 18.5Mtpa and a Dryer at full capacity will only be needed for future expansions beyond 18.5 Mtpa.

therefore planned for 2020 in order to close data gaps/inconsistencies associated with the first campaign and to measure emissions from the new Dryer 4 once commissioned.

In January 2020, the CBG Environment Manager resigned from his position. CBG therefore took the decision to subcontract the update of the AQMP to a consultant/consultancy with air quality expertise. A scope of work for the finalisation of the AQMP was produced and a consultant was sourced via a CBG shareholder, however it became apparent that the consultant did not have the capacity to fulfil the full scope. More recently CBG has sought a replacement consultancy with stack sampling and air quality modelling capabilities to undertake the work.

The scope of work is summarised, by task, below as context for subsequent sections of this report.

1. Undertake analysis of stack emission results collected in 2019, identify any data gaps and ensure sampling was representative of normal operating conditions;
2. Undertake air quality dispersion modelling using the emissions data collected during the 2019 campaigns and validate against ambient air quality data where possible;
3. Prepare an Interim AQMP based on the 2019 emission data and dispersion modelling that proposes stack emissions limits and mitigation measures for emissions sources, including Dryers 1 to 3;
4. Propose additional sampling to close gaps identified from the 2019 campaign and ensure sampling is representative of normal operating conditions. Additional sampling should include sampling of Dryer 4 and additional sampling of Dryers 1-3 as informed by the data review described in task 1 above;
5. Define (confirm) a set of KPIs and established a periodic stack emission monitoring schedule; and
6. Update the AQMP (the Final AQMP) to include mitigation measures necessary to meet agreed limits.

The scope of work included timeframes that have not been met by CBG. In particular, the delivery of an Interim AQMP was scheduled for July 2020 but is unlikely to be available before the end of Q3 2020 due to delays and the change in the air quality consultancy.

The IESC has discussed the scope of work with CBG and a representative of the proposed Consultancy and is comfortable that the scope is appropriate and fully understood by the proposed consultancy. However, it should be noted that there is an interdependency between the various tasks listed above. For example, tasks 2 and 3 are reliant on the quality of sampling data to date (task 1). Similarly, task 4 (scope of additional sampling) will be informed by the outcome of task 1 (adequacy of data collected in 2019) and, also, the timeframe for commissioning of Dryer 4, both of which are currently unknowns. Any in-country sampling may also be hindered by current and future COVID-19 related travel restrictions.

Given the uncertainties highlighted above, it is difficult to define the scope and timeframe of additional sampling needs and thus timeframes for completion of the AQMP. The IESC has agreed with CBG that the Air Quality consultant will provide periodic progress updates as information influencing subsequent tasks in the scope becomes available.

### 7.2.2 Air quality monitoring data

CBG's air quality monitoring programme is defined in its Environmental Monitoring Programme (EMoP D390-MOT-PLN-0033 EN v00 Rev002) and refers to the use of a combination of static and mobile monitoring devices. An air quality monitoring station is in Kamsar close to a primary school for measurement of NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and Total Suspended Particulates (TSP). The EMoP specifies the use of passive NO<sub>x</sub>, NO<sub>2</sub> and SO<sub>2</sub> samplers in Kamsar (2 further locations) and

the Sangaredi mining areas (7 sampling stations). Particulates are also measured at these locations using MinVols samplers, including analysis of metals in TSP samples. The mobile monitoring equipment is also used for air quality measurements on mined areas in accordance with the PbP approach.

The AMR, reviewed in parallel with the VSV, reveals several technical and logistical issues preventing CBG from completing sampling in accordance with the EMoP. For example:

- Sampling for gaseous pollutants (NO<sub>x</sub>, NO<sub>2</sub> and SO<sub>2</sub>) was not undertaken in Sangaredi – sampling was limited to particulates;
- Sampling of particulates was limited to 2 out of a planned 4 planned campaigns for 2019; and
- The permanent AQ monitoring station in Kamsar has experienced numerous technical problems affecting the number and quality of measurements taken. At the time of the VSV, the IESC was informed that the permanent monitoring station was either malfunctioning or providing 'suspicious' data for all parameters being monitored and required repair and calibration.

The IESC is aware that sensitive monitoring equipment can be prone to malfunctioning and, also, acknowledges difficulties experienced in 2020 as a result of COVID-19 travel restrictions, but nevertheless considers the level of ambient air quality monitoring to fall well below the levels described in the EMoP.

### 7.2.3 Reporting of monitoring results to communities

CBG does not routinely report the results of its environmental monitoring to communities unless there is a complaint and/or specific request to share its results. The EMoP does not make a firm commitment to public disclosure of environmental monitoring data, however it references the SEP which in turn includes text relating to participatory monitoring and disclosure of results as follows:

*"In some instances, stakeholder participation can consist of ensuring the presence of local stakeholders at the time the monitoring takes places. Moreover, the CBG will regularly disclose information regarding various monitoring activities such as:*

- *Providing information about ongoing environmental and social monitoring campaigns;*
- *Explaining monitoring methods;*
- ***Presenting monitoring results (emphasis added);*** and
- *Providing education regarding resource conservation"*

CBG should revisit the statements made in the SEP and give further attention to the presentation of monitoring results (air quality results and others as relevant) to affected communities. The IESC recommends CBG's disclosure to communities should be reported in the AMR.

### 7.2.4 Status of AQMP implementation

The current AQMP (dated January 2019) includes a detailed action plan with 27 discrete actions. CBG reported 6 to be complete and a further 6 to be ongoing, with the remaining 15 yet to be started.

## 7.3 Water Quality

### 7.3.1 Oil/water separator at tank farm

The IESC has previously reported oil concentrations that exceed Guinean (50ppm) and IFC (15ppm) limits in treated effluent from the main oil/water separator (a combination of two separators working in sequence) located at the tank farm in Kamsar. In July 2019, CBG

highlighted several specific actions that were underway at the time to address the exceedances, as follows:

- Reduction of oil at source - investigation into the sources of oil which will be followed by efforts to reduce oil at source;
- The manufacturer of the plant (ASC Machinery) had a representative on site investigating the problem and looking at options that will result in compliance with effluent quality standards; and
- The (then) Environment Manager, who had a background in industrial wastewater treatment, was considering the use of a Dissolved Air Flotation technique.

In July 2020, CBG reported no engineered modifications had been made to the oil/water separator, but that reduction of oil at source combined with cleaning of filters in the current system have been the main focus, resulting in significant reduction in the 'oil-in-water' concentrations being discharged. Effluent monitoring data provided to the IESC supports this assertion. In early August 2019, immediately after the 2019 site visit, oil-in-water concentrations were measured to be between 150-175 ppm. More recent monitoring data from February to July 2020 has shown oil-in-water concentrations to be typically fluctuating between the IFC and Guinean standards (15 to 50ppm) indicating measures to reduce oil at source have been successful. A primary reason cited is enforcement of improved practices at the rail workshop in Kamsar where oil is now collected separately in a tank for disposal rather than washed into the drainage channel (by some employees against agreed practices) for subsequent treatment at the oil/water separator. However, despite this reduction in concentrations of oil discharged to the estuary, most samples remained above the IFC limit, with only one sample reported to be below 15ppm.

The IESC has previously been supportive of CBG's plans to upgrade the oil/water separator, and despite the encouraging reduction in oil-in-water concentrations shown in recent data, concentrations remain above the IFC limit of 15ppm for the vast majority of samples taken, and the IESC position remains unchanged. The IESC was informed that engineering solutions are still being discussed. It is therefore recommended that CBG continues to finalise and implement a preferred engineering solution to further reduce oil-in-water discharge to levels at or below 15ppm.

### 7.3.2 Wastewater treatment at Sangarédi

The IESC has reported in successive monitoring reports that CBG is aware of the need to maintain and upgrade the Sangarédi wastewater treatment plant (WWTP), but also noted a lack of actions in its previous monitoring report in July 2019.

With the finalisation of the Water Management Plan (WMP) in January 2019, there is a clear set of actions and timeframes to which CBG is committed. Whereas the IESC acknowledges progress in many areas, the WMP requires several key actions relating to the upgrade of the Sangarédi WWTP including:

- Upgrade of pumping stations, originally scheduled for Q1, Q2 2019;
- Emptying the primary sludge tank, originally scheduled for Q2, Q3 2019; and
- Installation of a tertiary UV treatment plant; originally scheduled for completion in Q2, 2019.

Of these, the first two have not started and the third is categorised as ongoing.

The IESC's July 2019 monitoring report includes the finding that *'the UV treatment plant, a critical component of the WWTP needed to reduce faecal coliforms downstream of the facility, had been purchased and was in Kamsar awaiting transportation and installation'*. Based on discussion during the VSV, the IESC was informed that the UV treatment plant is still in Kamsar awaiting

installation and commissioning. CBG confirmed, also, that a specialist contractor from Conakry has been appointed to install the plant, however, has been unable to complete the works due COVID-19 travel restrictions. CBG's current expectation is for installation to occur in Q4, 2020, although this is dependent on the lifting of in-country travel restrictions.

Whereas the delays caused by COVID-19 travel restrictions are unfortunate and understandable there is nevertheless an urgency to complete the installation of the UV treatment plant. The urgency is exemplified by surface water quality results taken at the Sangarédi WWTP where results for faecal coliforms are consistently above applicable standards<sup>13</sup>.

### 7.3.3 Water quality monitoring

The water quality monitoring programme is specified in the EMoP and comprises the analysis of a variety of parameters in industrial and sanitary wastewater effluents, surface waters and groundwater across CBG's processing and mining facilities. The sampling programme is comprehensive with analysis of samples being undertaken via a combination of in-house and external laboratories depending on the complexity of the analytical technique being used and need for duplicate samples for quality assurance purposes.

The IESC reviewed the data presented in the AMR and noted several samples and/or analyses were not conducted in accordance with the EMoP, for example, certain parameters specified for analysis in the EMoP were not analysed, for example total coliforms in surface waters, but no clear explanation is provided for the omissions.

Exceedances against applicable standards were found, for example, exceedances of iron and aluminium concentrations from samples from the Cogon water treatment plant (Sangarédi). The AMR indicates that measures/actions plans are underway to address exceedances, however there is little detail about the actions taken or the timeframes for such actions.

The AMR also refers to several logistical and administrative problems encountered in 2019; however, of particular note is the termination of the contract with an external laboratory based in Canada. The IESC was informed that the contract with the Canadian laboratory expired at the end of 2019 and was not renewed, in part because of the departure of the (then) Environment Manager. Furthermore, CBG is reluctant to renew the contract because of the logistical difficulties and expense of sending samples to Canada. Instead, CBG would prefer to conduct more analysis in-house and in-country and has a number of initiatives currently ongoing to achieve this goal, including procurement of new equipment such as a Gas Chromatograph, discussion with laboratories in Conakry and also a Nigerian based company with a laboratory in Guinea servicing a neighbouring mining company.

The IESC has previously expressed concern over the long-distance transportation of samples and is in broad agreement with CBG's approach to internalise analyses provided the integrity of sample results is maintained via a robust quality assurance process based on the analysis of duplicate samples by a second laboratory. However, in house and/or in-country analytical capabilities should have been secured before the termination of the external laboratory to avoid a period of reduced analytical capability. The IESC therefore strongly recommends full water analytical capability is procured as a matter of priority to ensure analysis of all samples in accordance with the EMoP whilst CBG transitions away from its dependency on external/internal laboratories. The transition period should be used to secure contracts with local/in-country laboratories, procure equipment and reagents (recognising current delays caused by the COVID-19 travel restrictions) and to train laboratory technicians.

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<sup>13</sup> Annual Monitoring Report, 2019. Section 1.5 Sanitary effluents

## 7.4 Noise and Vibration

The EMoP specifies 10 locations for noise measurements spread evenly between Kamsar and Sangarédi. Additional samples are also taken on an as needed basis in accordance with the PbP approach. The EMoP specifies measurements are to be taken quarterly over a 48-hour period to ensure day and night-time noise levels are recorded.

The 2019 AMR only presents results for Q1 2019 and states that the results are below IFC standards, although the data in the AMR summary does not differentiate between day-time and night-time noise levels making it difficult for the IESC to verify this statement.

CBG explained that the limited number of noise measurements taken in 2019 was a result of faulty and/or uncalibrated noise meters. Two new meters (making four in total) have been purchased in 2020 to help ensure measurements can be taken throughout the year. CBG has also reported additional monitoring locations and monitoring protocols have been agreed based on advice from EEM relating to noise and vibration monitoring along the railway.

CBG has highlighted further difficulties in noise monitoring as a result of COVID-19 travel restrictions. Nevertheless, the procurement of new noise meters, combined with additional monitoring locations should improve the noise data presented in the 2020 AMR. The IESC recommends better interpretation of noise data in the 2020 AMR including differentiation between day- and night-time levels and comparison with the respective standards. More detailed data should also be provided in the Appendices to future AMRs.

## 7.5 Waste management

### 7.5.1 Kamsar

Progress in the establishment of waste management facilities at Tora Bora are ongoing and includes the following since the previous visit in July 2019: construction of an office; drainage control completed; fencing erected to secure the site; bioremediation slab ready to receive oil contaminated soils (in the dry season) and incinerators operating (although one has recently failed).

CBG has also reported reduction in waste held at the temporary stage area in Kamsar. Photographic evidence appears to support CBG's claim that wood and scrap metal have been recovered for recycling. Furthermore, oil stored in drums located in various locations has been utilised as fuel for the bauxite dryers. The issue of waste management has been a concern to the IESC throughout its monitoring visits and it is therefore pleasing to see the progress being made.

CBG also reported that it has plans to start reusing the municipal facility at Bendougou. The intention would be to use the Bendougou site for Kamsar municipal waste, and periodically help clear residential areas of wastes. The IESC supports CBG's endeavours to support with community waste management, however, is also aware of the problems encountered previously by CBG when attempting to transport heavy garbage trucks through villages en-route to the landfill. It is therefore recommended that the CR team engages with the affected community members prior to any recommencement of such activity.

### 7.5.2 Sangaredi

CBG's Waste Management Plan allows for a significant upgrade of the landfill at Sangarédi, in effect, a duplication of the facilities at Tora Bora, Kamsar. In July 2019 little progress had been made in this respect, however in July 2020 a decision had been made to upgrade the existing facility in Sangarédi following ground investigation studies. Thus, the new facility will include an office, incinerator, lined landfill cells, bioremediation slab and composting slab. At the time of the

VSV some preliminary ground preparation works had been completed and a call was out for tenders and the evaluation process was underway.

As an overall observation, good progress is being made towards the implementation of significant waste related actions, albeit behind the original schedule anticipated by CBG.

## **7.6 Resource Use and Energy Efficiency**

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

### **7.6.1 Water use**

The RUEEMP includes an action plan similar to those in other plans. The actions are to some extent sequential and include the acquisition and installation of additional water meters and other necessary equipment based on the result of a survey-informed metering and monitoring plan. Installation of meters is an initial task because it is a prerequisite to meaningful monitoring and informed (measured) reductions in water usage. A study of available flow meters has been conducted and recommendations made for a range of flow meters to suit CBG's needs.

In addition to prioritising the procurement and installation of flow meters, CBG is also looking to undertake urgent maintenance of the water distribution system. This will involve measures to address illegal offtakes in communities, where volumes of offtake cannot be managed or measured. Such an initiative has the potential to provoke and adverse community response, especially where security may be required, thus it is recommended that measures to enter communities and halt illegal offtake is managed in coordination with the CR team.

Moving forward, CBG is proposing to establish a Water Management Committee. In the IESC opinion, progress with the RUEEMP is behind other plans and the IESC is supportive of this proposal and the impetus such a Committee would bring.

### **7.6.2 Energy use and GHG emissions**

The RUEEMP includes several energy efficiency management actions that are captured in the Action Plan, many of which have not yet started, based on a review of the Action Plan progress tracker. Included in the Action Plan are the following key tasks:

- Develop and implement a procedure to estimate GHG emissions across CBG facilities (a GHG Standard Operating Procedure [SOP]), consistent with the RUEEMP and international standards; and
- Implement an information database to ensure energy and GHG performance indicators are stored, retained, managed and accessible within a single database across CBG facilities.

These tasks, among others, are important in order for CBG to comply with the reporting requirements of the AMR, specifically, the reporting of annual GHG emissions. CBG informed the IESC that it has calculated GHG emissions for 2019 AMR, but the data were not available in time for its inclusion in the AMR. The IESC has been provided with a summary of emissions, broken down by CBG activity and expressed as tonnes CO<sub>2</sub> eq. However, it is not clear what methodology has been used to calculate emission, nor whether the calculation method aligns with a recognised international methodology.

The IESC makes several recommendations, in addition to a general recommendation to accelerate implementation of the RUEEMP Action Plan, as follows:

- Agree internally on a methodology for calculation of GHG emissions consistent with the need for an internationally recognised methodology. The IESC understands a SOP for GHG has been prepared by EEM and this logically should be CBG's starting point;

- Ensure GHG emissions, calculated using a robust methodology that can be repeated year-on-year, are reported in the 2020 AMR; and
- Commission the services of an external energy efficiency consultant to undertake an audit of energy use. This approach is consistent with the objectives of the RUEEMP and would fast track the identification of energy (and cost) savings/reduction in GHG emissions.

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

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
July 2020_015	Air quality – finalisation of the AQMP	Preparation of an updated AQMP, inclusive of stack emission limits for bauxite dryers is behind schedule and agreed dates for delivery of an Interim AQMP have lapsed.	Appoint a competent air quality specialist/organisation to carry the works in accordance with an agreed scope of work at the earliest opportunity.	<b>High</b>
July 2020_016	Air quality – ambient air quality monitoring	The scope of air quality monitoring undertaken falls short of the scope specified in the EMoP, both in terms of range of parameters analysed and location of sampling points. The reduced scope is due largely to faulty equipment and calibration issues.  The reduced sampling capability is reflected in the limited results presented in the 2019 AMR which was consequently found to be inadequate.	Conduct a comprehensive review of air quality monitoring capabilities and identify corrective actions with consideration given to: <ul style="list-style-type: none"> <li>in-house competencies to operate and maintain complex equipment/training needs; and</li> <li>procurement of spares (holding spares in stock).</li> </ul>	<b>High</b>
2020_017	Air quality - disclosure of monitoring results	The SEP outlines several initiatives relating to participatory monitoring, including presentation of monitoring results, which are not implemented.	Revisit the statements made in the SEP and give further attention to the presentation of monitoring results (air quality results and others as relevant) to key stakeholders such as affected communities. The IESC recommends CBG's disclosure to affected communities should be reported in the AMR.	<b>Moderate</b>
July 2020_018	Water Quality – oil/water separator	Discharges from the oil/water separator located adjacent to the tank farm in Kamsar continue to exceed the IFC limit.	Priority to be given to finalising and implementing a preferred engineering solution to ensure the treated effluent satisfies the IFC oil-in-water limit.	<b>Moderate</b>
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.	Priority should be given to completion of this installation to prevent further delay, pending the lifting of current COVID-19 travel restrictions.	<b>Moderate</b>
2020_020	Water quality monitoring	CBG is not analysing all water samples in accordance with the EMoP and does not currently have a contract with an external laboratory for	Full water quality analytical capability to be procured as a matter of priority to ensure analysis of all samples in accordance with the EMoP, during a transition period, to allow CBG to strengthen its	<b>Moderate</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
		analysis of complex parameters and for quality assurance purposes.	own capabilities, noting that COVID-19 is delaying procurement of certain analytical equipment.	
July 2020_021	Water quality – reporting in the AMR	The AMR indicates that several samples and/or analyses were not conducted in accordance with the EMoP. The AMR further indicates that measures/actions plans are underway to address exceedances, however there is little detail about the actions taken or the timeframes for such actions.	Where there are exceedances against applicable standards, or samples/analyses could not be taken, the reasons for such omissions should be detailed in the AMR. Corrective actions with indicative timeframes should also be described in the AMR.	<b>Minor</b>
July 2020_022	Noise and vibration	CBG has been unable to meet the noise monitoring requirements specified in the EMoP because of faulty monitoring equipment and more recently COVID-19 travel restrictions. Noise and vibration data provided in the 2019 AMR (and its appendices) was of limited value.	The procurement of additional noise meters should allow CBG to undertake the noise sampling programme as specified in the EMoP. Better presentation and interpretation of noise and vibration results relative to applicable standards is required in future AMRs.	<b>Minor</b>
July 2020_023	Solid waste	CBG has reported that it plans to start reusing the municipal facility at Bendougou for Kamsar municipal waste, and periodically help clear residential areas of wastes. In the past, CBG encountered community resistance when attempting the transport of heavy garbage trucks through villages <i>en-route</i> to the Bendougou landfill facility.	Engagement needed with affected communities, located along the access route, prior to any recommencement of transport of heavy garbage trucks through villages <i>en-route</i> to the Bendougou landfill facility.	<b>Moderate</b>
July 2020_024	Resource use – water consumption	CBG is also looking to undertake urgent maintenance of the water distribution system including investigating illegal offtakes in communities. Such an initiative has the potential to provoke and adverse community response, especially where security provision may be are required.	Any decision to prohibit the illegal offtake of water should be managed with full involvement of the CR team to reduce the risk of community tensions.	<b>Minor</b>
July 2020_025	Resource use – GHG emissions	CBG did not report GHG emissions in the 2019 AMR. Furthermore, many of the measures	CBG should report GHG emission in the 2020 AMR. In order to do so it should first agree internally on	<b>Moderate</b>

ID	Aspect	Issue Description	IESC Recommendation	Significance
		specified in the RUEEMP Action Plan are behind schedule, including reaching internal agreement on use of an internationally-recognised method for the calculation of GHG emissions.	<p>a methodology for calculation of GHG emissions consistent with the need for an internationally recognised methodology.</p> <p>CBG should also commission an external energy efficiency consultant to identify opportunities to reduce energy use and therefore GHG emissions.</p>	

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

### 8.1 Introduction

CBG is implementing the Community Health and Safety Management Plan (CHSMP) and the implementation of this Plan was investigated during the VSV. Also, opportunities were taken to examine certain topics (including some 'issues', raised previously in IESC monitoring reports), to assess their status now and into the near future.

The issues considered are:

- Roads/traffic and community health and safety;
- Rail and community health and safety;
- Malaria prevention programme (this is considered in Section 8.2 on the CHSMP implementation review); and
- Management of security provision.

Finally, a brief account is provided of measures implemented under CBG's COVID-19 Response Plan aimed at protecting community health

### 8.2 Community Health and Safety Management Plan implementation

The CHSMP, approved in January 2019, contains an Action Plan with 22 actions; 5 of which are continuous. It is noteworthy that no actions have been postponed to a later start date.

As of 30 June 2020, an analysis of implementation progress showed the following:

Status of Actions	Number of actions
Completed	3
Not Started	3
In progress	2
Continuing	14

Of the 5 actions completed or in progress, 3 relate to road and rail community health and safety issues. Of the 3 actions classed as not started, 2 are actions relating to the existing CBG anti-malaria programme. The decision not to start these actions results from an opportunity to integrate the CBG programme with a wider, multi-partner anti-malaria campaign to be implemented by the Chamber of Mines and the Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (German Agency for International Co-operation). CBG's internal anti-malaria actions are on hold until the details of this wider campaign are finalised. In the interim; however, certain actions under the CBG programme have continued; particularly, the distribution of bed nets to CBG employees (3 nets/employee) and to the Hamdallaye residents for use in their new houses (1 net/room).

One action in progress is noteworthy. Work is advancing to improve the existing protocol to ensure that blasting operations avoid damage or harm to community resident, animals and other assets (or minimise any harm, to the extent feasible).

### 8.3 Roads/Traffic and community health and safety

Work is underway to improve road safety with respect to both community members and CBG personnel involved in road maintenance and, also, when driving company/personal vehicles. The Road Safety Action Plan has 6 key topics with each topic having several actions. The topics are:

- Conduct a road transportation risk assessment;
- Provide training on defensive driving for light vehicle drivers;
- Training and awareness for communities;
- Implement safety procedures;
- Installation of signposting, road signage and traffic management; and
- Installation of electronic safety equipment.

Work has started on the assessment of transport risks. A team has been established to determine the risks for a series of zones; essentially, zones between the mining area (Sangarédi) and Kamsar (inclusive of the mining area and Kamsar) and, also, from Kolaboui to Conakry and the CBG site in Conakry. Work on these latter two zones has been completed and risk registers prepared with a priority ranking of the risks. The H&S hierarchy of controls is applied to the risks to identify actions to be taken to eliminate, avoid and reduce the risks. Implementation of some actions has started such as installation of electronic safety equipment; in particular, provision of VHF radios and driver anti-sleep alarms in all vehicles.

#### **8.4 Railway and community health and safety**

The AMR records that, in May and August 2019, there were two railway accidents in Kamsar, each involving the death of a member of the public, both of whom were suffering from mental illness. A review of the corrective actions, in the AMR, results in the following list of key measures to reduce the risk of further fatalities (with a focus to some extent on people with mental illnesses):

- 'Hommes Piquets' ('crossing supervisors') were assigned to eight pedestrian crossings in Kamsar, from PK 7.7 to PK 10.8. Their role is to alert pedestrians when a train is approaching/passing;
- Pending the installation of the final signage system, temporary signage was implemented. At each set of points (*aiguilles*), two pointsmen are placed to ensure that the rails are properly aligned in case of any change of rail direction;
- To facilitate access to water and reduce the number of people crossing the railway (mostly women and children), seven boreholes were drilled to provide water in several communities along the railway:
  - 3 boreholes in Kamsar (Filima, Madina Borbof and Kamakouloun);
  - 2 boreholes in Boké (Madina Carrefour and Dakountou);
  - 1 borehole in Tanéné (Kafélé); and
  - 1 borehole in Sangarédi (Lafou Mbaïla);
- Setting up systems for the identification, reception and management of people with disabilities and mental illnesses walking on the railway.
- Provision of training and safety awareness raising in the communities; and
- Deploying a proactive long-term Fatality Prevention Initiative. This Initiative is ongoing with IFC Advisory support and the CBG Rail Safety Management Program.

The first three of these measures are included in the current version of the MUOA TMP – see Section 8.4.1 below. In addition, the TMP includes an action to provide a footbridge (*passerelle*) for the village of Telibofi (an issue that has been mentioned in previous IESC monitoring reports) in context of the increase in the population of the village due to the return of villagers from the Kankalaré hamlets.

*[Post-VSV Note: On 11 August 2020, CBG posted a notification of an incident involving a collision between two locomotives [COBAD] and an empty train [CBG] on a siding in Kamsar (PK 4). Five*

*employees were injured, but no member of the public is reported as being affected by the collision].*

#### 8.4.1 MUOA Transitional Measures Plan

This Plan, which is almost finalised, is currently being changed to reflect recent MUOA amendments. Its scope is the entire railway (not only those sections where track has been doubled) and for a period up to the end of 2022 (although some measures will continue beyond that date). It contains 19 measures all of which are in a specific stage of implementation. Three of them were initiated in Q3 and Q4 2019 and these are included in the Plan. Others are in the design/planning or implementation stages. The measures are a mix of 'soft' and 'hard' measures: 'soft' measures include non-structural measures such as community sensitisation on H&S risks; whereas 'hard' measures include installation of infrastructure such as footbridges (*passerelles*) and new or improved facilities for vehicular crossing of the railway such as manned or automatic level crossings. The TMP measures will be incorporated into the revised Action Plan of the Rail Safety Management Plan (see Section 8.4.2 below).

A key TMP feature is the extent of community and local government consultations to discuss the type and location of 'hard' measures. These measures tend to be focused upon urban and peri-urban areas where population density is higher, therefore most of the consultations have occurred in such areas. One of the key issues raised by local people has been not only the type and location of crossings, but also CBG's wish to install betafences in the vicinity of the installed crossings (to prevent informal crossing of the railway by pedestrians and cyclists and 'guide' them to use the installed crossings). At the time of the VSV, CBG had been able to hold consultation meetings from May 2020 and, in fact, some meetings were being held at the time of the VSV. Most consultations had been concluded by the end of 15 July and agreement had been reached on almost all of the crossings proposed by CBG; although some stakeholders had 'side' issues which still need to be resolved such as installation of a betafence after installation of the crossing infrastructure and a request for adding a crossing at a location in the Tanéné area.

Currently, key milestones for the planning and installation of the footbridges are as follows:

- Validation of the final options (12 August 2020);
- Call for tenders for provision of footbridges (15 September 2020); and
- Installation of footbridges (21 September 2021).

Although some temporary measures have been in place since Q3/Q4 2019 and several 'soft' measures are being implemented; train movements have been increasing (from 5 or 6 trains per day in 2018 to 10 trains per day in early 2020). The risk to community members has increased over the past two years and will continue to increase until end 2021. Therefore, it is recommended that the Rail Safety Management Plan (and Action Plan) needs 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.

#### 8.4.2 Rail Safety Management Plan

Compared to the Road Safety Management Plan; work on implementing the Rail Safety Management Plan is not so far advanced. Work started on the implementation of actions a few weeks before the VSV and it is intended, as indicated above, to integrate the TMP measures into the Action Plan (as part of the Road Safety Management Plan). A timescale for an overall review of the Action Plan is not yet fixed, but it is foreseen to occur by the end of September 2020. CFB considers that the current Action Plan requires amending as it is not sufficiently focused on the realities of operating a railway in West Africa. As mentioned above, changes to an E&S management plan require notification to Lenders under the MoC procedure.

## 8.5 Security Management Plan: review

The Security Management Plan has no Action Plan so the review was not anchored in a set of the actions and their implementation status. However, this Plan does contain commitments and, during the VSV, a meeting with senior staff members of the Security Department covered a wide range of issues including work done/underway in relation to certain key commitments. It was confirmed during the meeting that CBG does not intend to amend the Plan in the near future.

There were periods of social unrest over the past 12 months that caused some challenges for CBG. The origins of the unrest lie outside the control of CBG (primarily, problems of public utility service delivery, especially water and electricity), but resulting roadblocks and other activities affected CBG's ability to meet its production targets. Despite the locations and extent of the social unrest, the crisis levels were only raised from blue (permanent conditions) to green (first indications of a potential crisis) on two occasions in 2020 year-to-date.

More recently, there has been social unrest concerning government-imposed COVID-19 restrictions (mostly in the concession area). COVID-19 has resulted in some changes in the way that security guards interact with the public. There is a special team established to man barriers and protect certain assets. No grievances against security guards have been received.

Depending on the changes in crisis level, CBG remains able to call upon the forces of public order (police, gendarmerie and military). The arrangements (including rules of engagement) under which this is managed is a Protocol between CBG and the Government of Guinea. This Protocol is dated 2015 and is renewed periodically.

Should a community-based threat to CBG personnel and/or assets arise, the first action is for the CR team with support of the local authorities (for example, *mairie* and *commune*) to try to defuse the situation. Should this be unsuccessful, and the threat seems likely to increase, then the police will be asked to assist. As necessary, and if the threat increases, support may be requested from the gendarmerie and/or the military.

Currently, there are 8 'private sector' security contractors/providers, contracted by CBG. These security providers deploy 767 guards, of which 108 are women (14%). In addition, two contractors working on the MUOA Project have hired two security providers. The Security Department expects that the provision of security for the railway will increase given addition of extra rail infrastructure and increase in train movements. CBG requires specific training for all security guards and this includes training on human rights. Training records are maintained.

CBG has 16 security inspectors who undertake random checks of security provider performance. Reports are provided to a senior Security Department staff member. Corrective actions are identified and must be implemented by the provider. Performance is then assessed during the next random check.

## 8.6 COVID-19

Since end of March 2020, CBG has been implementing its COVID-19 Response Plan. Under this Plan, CBG has sensitized 148 villages in Daramagnaki, Sangarédi, Kamsar, Tanéné, Boké centre and Kolaboui (1438 households encompassing 8644 individuals with 51% being female). To assist with this task CBG hired 20 'community agents'. The sensitization focused on prevention measures, modes of transmission and symptoms of COVID-19. The CR team, supported by IFC Advisory and staff from other CBG's departments/sections, played a major role in implementing the community-facing elements of the COVID-19 Response Plan. Under the Covid-19 response plan, CBG distributed sanitary kits to various communities in CBG areas of operation and to the villages around the mine. Materials were provided, also, to Hamdallaye villagers during the move to the new village site (see section 9.2.1).

Also, CBG, has established procedures to protect its workforce against COVID-19. Protecting workers makes a significant contribution to protecting communities (see Section 6.2.4).

**Table 8-1: Summary of Findings, PS4**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
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.	Operations	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.	<b>Moderate</b>

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

### 9.1 Introduction

Much of the focus of the VSV 'resettlement' work stream was similar to the July 2019 site visit. However, certain specific aspects were given emphasis:

- Hamdallaye village move (in light with the 'IDI' report<sup>14</sup> allegations, but not with the aim of countering them);
- Livelihood restoration in both Hamdallaye and Fassaly Foutabhé in the context of COVID-19 restrictions;
- Kankalaré Resettlement Action Plan (RAP) status and expected progress;
- Resettlement team's implementation capacity; and
- Linkages between mine planning and management of economic displacement arising from land acquisition.

The findings are presented under the headings below.

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

#### 9.2.1 Hamdallaye village move

There has been significant progress in the Hamdallaye village relocation with all households now living at the new site. Subject to on-site inspection and verifications in interviews with affected households, the move appears to have been well managed in successive waves over a period of about two months (February to March 2020), with adequate support provided by CBG in line with usual good practice, particularly in respect of the following:

- Adequate salvaging policy and support to dismantling and moving materials from the old to the new site;
- Adequate support to the most vulnerable in moving; and
- "Shade allowance" of GNF 3.5 Million (USD 350) per household, to support displaced households with the building of a structure or extension to an existing structure in order to provide shade in the immediate vicinity of their new houses as CBG recognises that the planted trees are not yet providing sufficient shade, and to take care of certain expenditures associated to the move.

According to information provided by CBG, the final stages of the move, that took place in March 2020, did not violate COVID-19 restrictions to movement that were applicable in Guinea at that time. In addition, CBG reported that usual COVID-19 related precautions, such as wearing masks and providing disinfectant, were taken during the last stages of the move.

Only interviews with PAPs will allow identification of outstanding grievances related to construction defects (often a difficult and lengthy process in large scale resettlement sites). The CBG resettlement team established a sound and comprehensive pre-move housing inspection system, successive punch-lists and supervision of the contractor to fix unavoidable construction defects in a timely manner during the guarantee period. Recent photographs provided by CBG suggest that the quality of finish is adequate, although this requires closer on-site investigation when travel restrictions are lifted.

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<sup>14</sup> IDI, ADREMGUI, CECIDE (June 2020) *The Relocation of Hamdallaye Village in the Midst of Covid-19: How CBG is Failing to Meet the IFC Performance Standards.*

Latrines are of the double Ventilated Improved Pit (VIP) type. Such latrines are well known in West Africa (they were developed in the early 1990s by the University of Science and Technology of Kumasi, Ghana, with support from UNDP and the World Bank). The latrine has two holes because it has two pits, which are meant to be used successively, not concurrently (the first pit is used until it is full, and only then does the second pit start being used). The latrines, therefore, are intended for single occupancy at all times. CBG has reported that training took place for users. It is recommended that CBG evaluate the effectiveness of training to date, especially regarding training on use of domestic facilities such as latrines and household hygiene for men, women and children, and, as necessary, provide targeted refresher training.

The site has six boreholes to supply water, each of them equipped with a foot-pump. Experience suggests that one such borehole can deliver up to 5 m<sup>3</sup>/day without excessive queuing. For 1,200 residents, this is 25 litres per person, per day, which is above the usual standard of 20 litres per day (the current Hamdallaye population is less than 1,200). Water quality was tested before the wells were put into operation and was confirmed to be potable for all wells.

Construction of community facilities and associated staffing has generally been adequately managed. Due to COVID-19; however, not all staff are present on-site yet:

- The primary school is complete, staffed and equipped. Teaching started at the end of June 2020. CBG accepted the IESC's recommendation to build houses for teachers (see the IESC's July 2019 monitoring report). Construction of these houses has not been started yet but this is expected to be substantially completed by the end of 2020;
- The mosque, market and the community centre are operational; and
- Following the infrastructure technical hand-over, some additional works have been requested by the Ministry of Health on the Health Centre (such as floor tiles in the maternity room), and it is understood that staff have not yet been appointed.

### 9.2.2 Fassaly Foutabhé

CBG reports that the school is now complete, except for the teachers' toilet. It is understood, by the IESC, that teaching will start in October 2020. There is no confirmation at this point of the actual appointment of teachers. The footbridge is also complete and being used. However, as of mid-July 2020 the vehicular bridge was not fully complete as some limited finishing work on the abutments remained to be done.

### 9.2.3 Livelihood Restoration at Hamdallaye and Fassaly Foutabhé

According to CBG's presentations and reports:

- The access roads to Hamdallaye agricultural land in areas known as Demouroudji valley, Kounsi Djjàrè and N'dangara Forest are substantially complete (although, according to photographs shown to the IESC, considerably more work appears to need to ensure satisfactory completion, for example cleaning up overspills of spoil material and stones beyond the used part of the track);
- The IESC had recommended before (further to the July 2019 visit) an agronomic review of the soil characteristics of an area of 56 ha, to be used for cultivation, that had undergone some rehabilitation at the resettlement site. Work is underway to implement the recommendations of this report to ensure that agro-pastoral activities in these 56 ha will be sustainable into the future.
- Similarly, land earmarked for livelihood restoration activities (26 hectares in Hamdallaye and 3 hectares in Fassaly Foutabhé) is also available and has started being used. Boreholes meant for gardening have also been drilled and equipped; and

- Establishment of 10 Economic Interest Groups (groups that follow specific income-generating activities), plus training events, occurring in both villages;
  - However, CECI's support to livelihood restoration activities has been significantly constrained by movement restrictions imposed as part of the COVID-19 related State of Emergency. In terms of the four livelihood income-generating activities identified (agriculture, small ruminant livestock, grasscutter husbandry, and bakery), only the first one has progressed significantly in 2020, while the other three streams have not made significant progress due to reduced CECI personnel field presence. Overall, some components could have progressed faster in spite of COVID-19 restrictions affecting CECI's presence, for example the construction by villagers or small local contractors of the fairly modest structures that are required for animal breeding.

#### 9.2.4 Recommendations Pertaining to Hamdallaye and Fassaly Foutabhé

The IESC recommends the following:

- Hamdallaye resettlement site:
  - Expedite procurement and execution of the few outstanding works (such as runoff drainage, access roads to agricultural land, plantations around community facilities, and teachers' houses);
  - Commission an agronomic review of the soil characteristics at the resettlement site to determine what measures should be taken to make the soil cultivable for gardening;
- Carry out a rapid PAP satisfaction survey after the end of the rainy season to identify any deficiencies so that they can be addressed in a timely manner; and
- Livelihood restoration: it is critical to resume all work streams for both Hamdallaye and Fassaly Foutabhé as soon as possible, while abiding by applicable COVID-19 restrictions. It is suggested to engage CECI and the local authorities (should derogations need to be issued) around a safe plan to bring CECI personnel back to site so that livelihood restoration is not disconnected (in time) from the actual impacts and the Hamdallaye village move.

### 9.3 Kankalaré Resettlement Action Plan

In terms of the community-level compensation measures committed to in the draft Kankalaré RAP, the IESC concerned to discover that there was no progress on provision of community infrastructure in the villages of Telebofi and Parawi: apart from the improvement of the road to Parawi, which is complete. There has been no progress regarding the proposed school at Telebofi, the health centre in Parawi<sup>15</sup>, and installation of iron removal devices for the wells of both villages. There has been no progress either on livelihood restoration planning, engagement with affected households, or implementation of any livelihood restoration activity.

These delays are a source of concern as impacts occurred some considerable time in the past, and the delay between the occurrence of the impact and the implementation of the livelihood restoration mitigation is a significant non-compliance. While some of the delays may be linked to the COVID-19 outbreak, the IESC considers that the attention of the resettlement implementation staff was primarily focused on the Hamdallaye move and there remained no time or resource to deal with these other tasks, which may have been perceived as of lesser priority. The IESC observed, also, that design and procurement of simple pieces of infrastructure (like the footbridge over the railway at Telebofi) is an excessively lengthy process compared to the scale and cost of the infrastructure to be provided. The Resettlement Team is dependent on other CBG

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<sup>15</sup> CBG continues to engage with local government authorities regarding provision and staffing of these community facilities as local government commitments are required.

departments, as it does not have adequate resources itself to manage such activities. It appears that the departments, upon which the Resettlement Team is dependent, have little or no incentive or willingness to prioritise such resettlement-related tasks.

#### **9.4 Gender**

Following the July 2019 IESC recommendations, CBG successfully sought Hamdallaye community consensus on broadening the membership of the Resettlement Committee to include women and youth. It is still structured by lineage as before, but each lineage is represented by three persons, one elder, one youth, and one woman. CBG reported that this new arrangement is effective, and that youth and female representatives are usually active and take responsibilities. This is to be used as a blueprint for similar activities in the future. Overall, women now represent about 22% of similar committees. CBG reports that women represent about 30% of total attendees at recent community consultation meetings. Although these figures represent positive progress the IESC believes this performance can still be improved, including by organising separate consultation and information events for females on a more systematic basis. Encouragingly, women are more active in EIGs with about 61% of the membership of these EIG being female.

Future recruitments to the Resettlement Team should focus on recruitment of females, who are currently somewhat underrepresented within the team (there are some Guinean female social specialists, some of them experienced, others less so but they could be trained to resettlement).

#### **9.5 Resettlement Implementation Capacity**

The Resettlement Team is headed by an expatriate resettlement manager with valuable experience of similar activities in West Africa. Together with his effective Guinean deputy, he has been instrumental in successfully delivering the Hamdallaye move. The team has also made significant progress in planning and mapping land acquisition needs against mine planning, with the generation of good and useful planning maps from a Geographic Information System that is used routinely and adequately. However, as indicated above, it is the IESC's opinion that this team remains under-resourced in view of the scale of its tasks. In comparison with other Guinean mining ventures managing physical and economic displacement of a similar magnitude, CBG has a total of five specialists (3 full-time staff members and two contractors), while a typical team, in a mining company, for a similar scope of work, could amount to between 15 and 20 staff members. It is the IESC's view that this under-resourcing explains the fact that two critical activities are well behind schedule; the implementation of the Kankalaré RAP and livelihood restoration activities generally.

The decision by CBG to outsource socioeconomic and asset surveys ("Framework Contract" with a consulting firm, currently in procurement stage) is a positive one, although the establishment of a framework contract with a consulting firm to cover this scope has not yet occurred. The IESC recommends that the scope of the consultant should include the drafting of LRPs and RAPs, which will both free the team from that task and ensure independent inputs into the planning process.

The IESC has commented previously that the absence of a proper compensation data management system was a significant impediment of cost-effective resettlement work. This has not been addressed yet and the IESC reiterates this recommendation. The team should either purchase an "off-the-shelf" system such as Borealis or Landfolio or commission a local developer to prepare a tailored application like other projects in Guinea have done successfully.

Recommendations to strengthen both the CR and Resettlement teams are presented in Section 5.1.2.

Finally, several delays, mostly involving infrastructure provision, are related to procurement (e.g. the above-mentioned framework contract) or engineering (the footbridge at Telebofi), for which

the resettlement team is dependent on other departments within CBG, for which resettlement activities are not necessarily a priority. In this regard, it is observed that other mining companies have successfully designated "focal persons" for resettlement in general services departments, who are responsible and accountable for timely delivery (and who could be incentivised for on-schedule delivery). It is recommended that CBG adopts a similar arrangement or enhances outsourcing instead (for example, design of simple community infrastructure).

## **9.6 Past Compensation Report**

The Past Compensation Report (v5), focusing on a review of past compensation to PAPs over the period 2010 to 2015), was submitted to the Lenders/IESC for review in June 2020. The review, although fraught with the unavoidable challenges inherent to this type of "legacy" exercise (for example, not all identified PAPs could be identified), is generally sound and the IESC supports the main findings. However, the action plan to ensure that PAP livelihoods are restored is not yet developed to the required level of detail and more work is required. The report should be concluded by clear corrective commitments presented as a time-bound and costed action plan, with roles and responsibilities identified (this requirement will be captured in the continuing Lender/IESC review process for the Past Compensation Report).

## **9.7 Mine and Resettlement Planning**

During the VSV, the IESC was informed, by CBG, about its plans for future land acquisition. The IESC understands that current planning for the next two to three years of mining extensions is as follows:

- One LRP for areas in the N'dangara and Parawi plateaux;
- One LRP for the Koobi Plateau (that would be joint with the Kankalaré RAP); and
- One LRP for the Kagneka Plateau and haul road.

The IESC recommends that this proposed approach could be simplified by preparing a single LRP for a mining period of two to three years (based upon the mine plan), rather than several LRPs on an PbP basis. The 'time-based' alternative would have the following benefits:

- Ensuring that the livelihood restoration approach is consistent for all PAPs (which is justified in the CBG concession as there are no significant differences in livelihood patterns between communities);
- Enabling better consideration of cumulative impacts affecting a given area or community, currently a weak aspect of CBG's land-related impact assessment, with successive rounds of land acquisition potentially affecting some communities to a point where their long-term viability could become questionable;
- Reducing the workload resulting from the preparation of multiple LRPs;
- Committing the mining department to a certain footprint, which would be disclosed to the Resettlement Team well ahead of the time when land needs arise, thereby allowing sufficient time for planning and consultation, and avoiding last minute deviations from agreed plans; and
- Eliminating the complexity and the dilution resulting from multiple plans.

This approach is successfully used by several large mining companies in Africa. RAPs would continue to be prepared as /when necessary for specific communities.

**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>
July 2020_027	Hamdallaye resettlement – resettlement site	Delivery and effectiveness of training on use of domestic facilities such as latrines and household hygiene is required.	Operations	Evaluate effectiveness of training to date, especially regarding training on use of domestic facilities such as latrines and household hygiene for men, women and children, and, as necessary, provide targeted refresher training.	<b>Moderate</b>
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	Operations	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.	<b>Moderate</b>
July 2020_029	Hamdallaye resettlement – resettlement site	Housing and infrastructure deficiencies and 'open' residents' grievances	Operations	Implement a rapid PAP satisfaction survey after the end of the rainy season to identify any deficiencies so that they can be addressed timely. To be done in Q4 2020.	<b>Moderate</b>
July 2020_030	Hamdallaye and Fassaly Foutabhé – livelihood restoration	Delays in delivery of livelihood restoration work streams for both Hamdallaye and Fassaly Foutabhé due to COVID-19 restrictions on movements.	Operations	Prepare an implementation plan with input from local authorities and taking COVID-19 restrictions into account, to maximise CECI's on-site activities in the second half of 2020 and into Q1 of 2021.	<b>High</b>
July 2020_031	Resettlement Team	The Resettlement Team members are all males.	Operations	Future recruitment to aim to improve gender balance of the team.	<b>Minor</b>
July 2020_032	Procurement	Procurement delays have hindered resettlement-related actions such as community infrastructure provision	Operations	Designate "focal persons" for resettlement-related requirements in general services departments, who will be responsible and accountable for timely delivery of services.  Also, more use of outsourcing when internal resources are stretched (for example, for design of simple community infrastructure).	<b>High</b>
July 2020_033	Consultancy support	The Scope of Work for the framework contract with a consulting firm to cover socioeconomic and asset	Operations	The Scope of Work for the consultant should include, also, the drafting of LRPs and RAPs in	<b>Moderate</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
		surveys, for resettlement planning work, has not yet been prepared.		addition to field-based work such as asset inventories and engagement.	
July 2020_034	Integration of mine and resettlement planning	The current approach of preparing LRPs on an PbP basis is complex and adds to CBG staff workload.	Operations	CBG to consider preparing LRPs for two- to three-year mining cycles rather than by plateau.	<b>Moderate</b>

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

### 10.1 Introduction

The biodiversity component of the VSV was completed through a series of calls between 21<sup>st</sup> – 23<sup>rd</sup> July 2020, involving the Biodiversity team and the IESC biodiversity specialist. Additional environmental and social specialists from both the IESC and the Lenders joined some calls, particularly the call to discuss mine rehabilitation. This section is set out following the same topics as discussed in individual calls.

### 10.2 The Biodiversity Management System: progress

The existing Biodiversity Management System (BMS) was developed in 2016 and includes 216 actions. At the time of the last check on progress, prior to commencement of the update process (as reported in the 2019 AMR), CBG had made the following progress (see Figure 10-1:

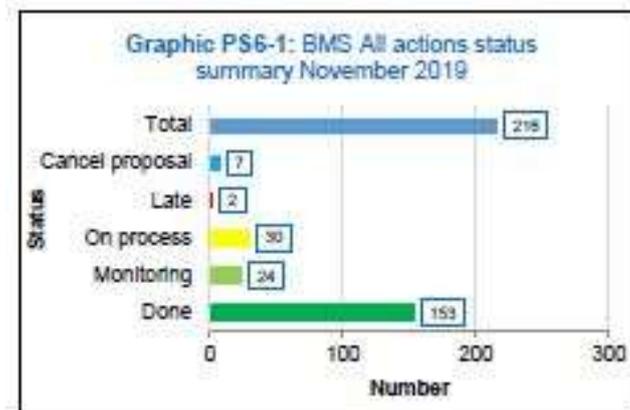


Figure 10-1: BMS Progress

The two noteworthy items considered to be late are freshwater aquatic surveys and marine surveys. These are discussed further in Sections 10.8 and 10.10 respectively along with the need for them to be addressed as a priority. With the exception of these two items, progress against the set of BMS is good.

Within the original BMS, there is a commitment for it to be updated in 2018. This update was delayed but is now in progress. The Biodiversity Consultancy (TBC) has been appointed to prepare the updated BMS, which will be termed a Biodiversity Action Plan (BAP) to align with PS6 guidance. The update is due to be completed by mid-September 2020. It will also include an update to the project Critical Habitat Assessment (CHA), originally completed by TBC in 2015.

During the VSV, it was confirmed that the update by TBC includes all BMS actions, regardless of their current status and will include, also, actions for any additional species identified during the CHA update.

The BMS update is a key action for CBG to demonstrate commitment and progress in meeting the requirements of PS6. Through the course of the VSV process and prior discussions with CBG and TBC, the IESC can report that it is pleased with the process in place and the progress being made. The intention is that the BMS update will be a more user-friendly document with better focused actions and will include supplementary actions for achieving no net loss (NNL) or net gains (NG) as appropriate, including a tracker of how these actions are progressing.

### 10.3 Plateau by Plateau/Land Disturbance Permits

CBG's presentation on this topic occurred in the week prior to the biodiversity calls and a summarised version was discussed with the IESC biodiversity specialist. As described in the IESC's July 2019 monitoring report, the PbP approach developed by CBG is a mine planning tool. Regarding avoidance of key features, e.g. gallery forest or watercourses, non-biodiversity features e.g. cultural heritage locations or reduction of cumulative impacts (e. g. having two roads close together), the PbP approach works very well at a plateau level. During the VSV, CBG presented a scenario showing results from applying the PbP approach to the proposed Kagneka haul road. After several iterations, the final route alignment successfully avoids high quality gallery forest, settlements and associated cultural heritage features.

At a concession/landscape level the PbP is a less effective approach. In order to address this, a landscape level assessment approach is proposed. See Section 10.6.

The provision of Land Disturbance Permits (LDP) is now intrinsically linked to the PbP process for all future mining area activities. Elsewhere, LDPs continue to be the mechanism by which any activities by CBG to disturb the environment are regulated, including those in the marine environment, e.g. dredging.

See also Section 9.7 for comments on the use of the PbP approach to resettlement planning.

### 10.4 Inspections

In order to monitor the compliance of CBG activities, including the MUOA project and, also, third parties such as SMB and COBAD, the Biodiversity team undertakes regular inspections or contributes to multi-disciplinary inspections, as follows:

- CBG actions: Biodiversity inspections; and
- SMB-W and COBAD: Biodiversity is a component of multi-disciplinary inspections.

The scope of the biodiversity inspections is identical irrespective of an inspection team's composition.

Inspection programmes, registers, progress charts, figures of inspection locations and inspection report proformas were all shown to the IESC and discussed, with specific requested examples of completed inspection reports provided subsequently. The IESC is satisfied that there is a clear, well organised programme for completion of inspections.

#### 10.4.1 CBG Inspections

There is a target of six biodiversity inspections per month of CBG operations. Between January and March 2020, 17 inspections were completed out of an intended 18. However, between April and June just 9 inspections were completed out of an intended 18. The major gap occurred in April when no inspections were possible due to the COVID-19 pandemic, with 4 and 5 inspections, in May and June respectively, being completed. Given the difficulties of completing site work during the pandemic, the Biodiversity team is to be commended for its efforts to continue its inspection programme within the restrictions.

Inspections are completed in such a way that, although site staff know that they are due to be inspected at some point in their works, they are not aware of imminent inspections, which ensures that the biodiversity inspection team can gain a true picture of the situation on the ground.

The inspections identify observations (focus upon matters of concern) and actions to be taken to remedy the observed situations of concern and these actions are tracked in the future. Progress

is good at CBG sites in addressing these items with 90% of them either addressed or in progress to being addressed.

#### SMB-W and COBAD Inspections

As in the case of CBG, SMB-W continued its activities throughout the pandemic, however the CBG inspection team was not permitted to visit the SMB-W site during April or May, with inspections restarting and continuing since June. The key biodiversity issues arising from the inspections are shown in Table 10-1.

**Table 10-1: Inspections - key biodiversity issues**

Operator	Key Issues
CBG	Topsoil management, dust & erosion control
COBAD	Water extraction, dust and erosion control
SMB	Water extraction, high human disturbance of natural habitats, bushmeat hunting.

In comparison to CBG’s activities, the biodiversity team does not have the ability to influence, directly, third-party actions; in particular, the implementation of corrective actions in response to biodiversity findings. The percentage of corrective actions addressed or in the process of being addressed reduces to 79% for COBAD and 69% for SMB (See also Section 5.9).

### 10.5 Community Forest Landscapes Approach and Onsite Offsets

The Biodiversity team is working on an approach to develop a community management system for the long-term conservation of natural forest habitats at a landscape scale and thereby best conserve fauna species, such as chimpanzees. The two onsite offset areas (the southern part of the South Cogon concession, south of the Kagneka area, and the Boulléré area) comprise the 30,000ha of landscape that CBG has for an onsite offset. The Boulléré area overlaps the Boulléré Key Biodiversity Area (KBA).

The previous approach of conserving individual areas of gallery forest, separate from human activities, has been replaced with one whereby owners and users would be compensated (type of compensation is not yet confirmed) and encouraged to undertake beneficial management activities within the gallery forest, rather than CBG imposing these activities. The activities include reducing hunting, promoting beekeeping, gallery forest restoration (for future wood/charcoal/palm oil sustainable harvesting, i.e. activities beneficial to all users of the gallery forest, both humans and other species such as chimpanzees).

CBG has agreements in place with five villages within the two areas (two in the southern area, three in the Boulléré area) and village associations have been set up in each of those villages. It is acknowledged by CBG that it needs to collaborate with GAC in the Boulléré area so that the approach is consistent in both concessions and, therefore, across the entire KBA spanning the two concessions.

The IESC is supportive of this new approach to management and enhancement of the onsite offset areas as it is more likely to succeed long term than CBG-imposed management which could only be enforced/maintained during its time operating in the area.

### 10.6 Réseau Environnement Bauxite

*Le Réseau Environnement Bauxite (REB)*<sup>16</sup> is a collaborative effort by six of the fourteen bauxite operators in the Boké region to develop a strategic plan and approach to mining, particularly

<sup>16</sup> The Bauxite Environment Network.

focusing on cumulative impacts and landscape/regional level forest conservation and restoration. CBG currently hold the presidency of REB and is developing a mining rehabilitation guide to be agreed and subsequently implemented by all operators.

The intention is to encourage the other eight operators in the region to join REB, not by attempting to enforce standards or approaches, but by demonstration that the REB approaches are sensible and effective for smooth operation of mining activities, particularly in combination with attempts to address community and social issues. The IESC notes that CBG is taking a leading role in the REB and intends to use its presidency to move forward attempts to create landscape-scale solutions.

## **10.7 Mine Rehabilitation**

The Mine Rehabilitation and Conceptual Closure Plan (MRCCP) sets out the requirements for restoration of land following the cessation of mining activities. Currently, CBG is working towards meeting its commitment to reduce the ratio of open mining areas to rehabilitated areas from its current 2:1 ratio to a ratio of 1:1 (within a 5-year catch-up period) such that there is never more land open for mining than has been rehabilitated. A key factor limiting progress, to date, for rehabilitation progress is availability of mined land and equipment provided by the mining department. In order to meet both its target to reduce the ratio of active mining:rehabilitated land to 1:1, and its 5-year catch-up target, senior management needs to implement measures to ensure swifter provision of land post mining, with equipment when needed, in order to allow timely rehabilitation.

Historically, there has been competition between rehabilitation for biodiversity or community use purposes. It was noted by the Biodiversity team that, prior to 2005, planting of native tree species was high, but after the Boké regional government directed, in 2005, that non-native cashew trees should be used in preference; cashew tree planting dominated the rehabilitation of mine lands for 12 years until 2017. The driving factors were that cashews provide a commercial crop and are comparatively cheaper and easier to plant, not least as they require less topsoil.

Topsoil availability is an issue for many sites as the bowal, often removed for mining, typically has very thin topsoil layers with the subsoil rock layer lying very close to the surface. It is extremely challenging to save enough topsoil for rehabilitation.

The IESC suggests that these issues provide further support for a strategic landscape approach, particularly if, by considering issues such as topsoil availability at a higher level, the necessary solution may be found.

However, in keeping with the community forest landscape approach, described in Section 10.5, the Biodiversity team is now attempting to have a greater proportion of native species in the planting mix, more typical of the surrounding gallery forest. Engagement with the communities will demonstrate the longer-term value of the resulting habitats to people.

In the specific case of the resettled Hamdallaye village, instead of cashew trees, the Biodiversity team is focusing efforts, currently, on planting of fruit trees (c. 70% of trees planted are fruit bearing). Five thousand (5,000) trees will be planted in 2021 (see Figure 10-2) and along with the vetiver grass, also to be planted in 2021, this should result in a 're-greening' of the village and the provision of shade.



## HAMDALLAYE 2020-2022 GREENING PLAN

ACTION PLAN	2019	2020	2021	2022	2023
NUMBER OF TREES	1763	1717	5000	2500	
VETIVER (Ha)			20		
MAINTENANCE	X	X	X	X	X
NUMBER OF SPECIES	8	8	15	15	



**Figure 10-2: Hamdallaye Greening Plan**

The Biodiversity team and its counterparts in the CBG CR team are aware of the importance of working jointly, and with local communities, to deliver sustainable rehabilitation of the mined areas. The rehabilitation will need to provide for the local communities’ needs as well as delivering beneficial effects for ecological receptors. The IESC notes that it is pleasing that the Biodiversity team is working actively and positively towards this aim, recognising that conservation efforts, imposed in isolation and without community engagement and buy-in, are more likely to fail in future.

### 10.8 Freshwater Aquatic Survey

This topic constitutes one of the two BMS actions considered to be overdue, with a commitment to undertake active surveys for endangered or endemic fish species having been in place since the BMS was completed. The delay in undertaking the surveys was raised by the IESC as a key concern in many previous visits and, most recently, in the report of the July 2019 monitoring visit. In the absence of survey data, the presence of gallery forest, along stretches of watercourses with the potential to support the endangered or endemic fish species, has been used as a proxy to delineate the extent of critical habitat.

In order to advance understanding, inform the BMS update and allow progress in delivering NG, the Biodiversity team has engaged with NatureMetrics with a view to using an environmental DNA (eDNA) approach to identifying likely presence of species. Rather than contracting with NatureMetrics, CBG will include eDNA survey as part of surveys for all faunal taxa from 2021. The initial pilot project for the aquatic surveys will be with a Guinean consultancy: CEMED. A contract is currently being agreed with surveys to start imminently. This involves collecting water samples from the watercourses and analysing those samples for traces of DNA. Matches are then sought for these DNA traces in catalogued reference examples.

Prior to the eDNA surveys, fish catching surveys and discussions with local fishers are to be completed to identify the species present and collect reference samples for unidentified rare or new species. For the first stage of survey work, the distribution of survey points will be focused on the southern part of the South Cogon concession. The next stage of survey work, by when eDNA reference samples for additional surveys would be available, would focus on the northern part of the South Cogon concession to complete coverage of the entire South Cogon concession area.

The IESC notes that NatureMetrics is a leading company in the field of eDNA and supports the proposed approach towards the presence of endangered/endemic species within the South Cogon concession area. Given the additional information which will be available as part of the surveys, the IESC expects actions in the updated BMS for freshwater fish species to be specific and clear, e.g. identifying type and location of any mitigation or enhancement intervention actions.

### **10.9 Other Surveys**

CBG has commissioned many monitoring surveys within its concession area in recent years, most notably the SYLVATROP chimpanzee monitoring survey (report issued in 2018) and the surveys of reptiles and amphibians by Guinée Ecologie.

Another area of particular focus has been botany, where, in collaboration with the University of Missouri, the Biodiversity team has developed a long term monitoring study involving permanent study plots across the concession which can be revisited repeatedly to record and analyse changes in habitats and species. The Biodiversity team has trained a team of local recent school-leavers as parobotanists (who have established a company to sell their services) so as to have local representation, knowledge and availability in the communities throughout its concession. Again, this aligns with the community and landscape scale approach being promoted by the Biodiversity team in order to embed conservation efforts within the communities which use forests.

As an example of an important objective, the parobotanists and the Biodiversity team are working on a phenology study to identify when and where trees and plants throughout the concession area flower and fruit. It is hoped that the information might be used in future to inform conservation of species which rely on these food resources, e.g. chimpanzees.

Plans for future monitoring of terrestrial species include design of future chimpanzee surveys to build upon the 2018 survey results. The Biodiversity team considers that a more detailed understanding of the usage of the area by discrete chimpanzee social groups would be extremely useful to progress the onsite offsets. In combination with the higher-level information gathered in 2018 on overall population size, this would give the Biodiversity team a good opportunity to focus efforts within the onsite offset areas. For the onsite offset area, within the Boulléré KBA, this will require strong collaboration with GAC throughout.

### **10.10 Dredging/Marine**

As stated above, activities in the marine environment are covered by the same LDP process that applies to land areas, for example, dredging was undertaken in 2019 following issue of an LDP.

At the time of the VSV, a previously-approved LDP for the 2020 maintenance dredge was withdrawn by the Biodiversity team, as the proposed approach from the dredging contractor would have led to works occurring within an exclusion period for fish spawning and consequently contravene the Dredging Management Plan (DMP). Subsequently, the LDP has been reapproved following amendment as it has been agreed that rescheduled dredging activities will cease before the September exclusion period. The IESC has been provided with a copy of the documentation

supporting this process, including the meeting Minutes when the new dredging period was agreed by all parties.

The IESC considers this outcome to be a good example of the LDP process working in practice as the Biodiversity team was able to ensure that the activity proceeded in compliance with biodiversity protections in the DMP.

Ahead of the 2020 dredging, the Biodiversity team has trained port staff in marine mammal awareness and marine mammal observation. Marine Mammal Observers will always be on watch during the dredging activities. Also, prior to the dredging campaign, the CBG biodiversity team is meeting with fishers to understand if they have caught any notable fish species or seen marine mammals or turtles recently. The same pre-dredging protections were in place for the 2019 maintenance dredging. In addition, underwater noise measurements are taken during dredging campaigns and this will be repeated in 2020. 2019 underwater noise monitoring data were provided to the IESC.

The DMP requires the results of each year's dredging campaign and analysis of monitoring data, to show compliance with the DMP, to be provided in a single report. No 2019 report has been prepared or provided by CBG. CBG need to provide the report to allow it and the IESC to check compliance with the requirements of the DMP.

The IESC considers that the baseline marine survey data are somewhat outdated and provide insufficient coverage for potential future dredging activities, in 2021, that may utilise sediment deposition areas not used previously. The Biodiversity team is aware of this issue. Updated marine surveys i for cetaceans, reptiles, fish and, potentially, benthos, should be completed in prior to the 2021 dredging campaign with subsequent surveys as required.

#### **10.11 Team Location**

The COVID 19 pandemic has highlighted the challenges for the Biodiversity team having its main base in Kamsar rather than Sangarédi. Restrictions on travel have largely prevented team members from going to the concession area. The IESC believes that Sangarédi would be a more resilient location for the team to be based as the vast majority of CBG's activities occur in that area. It would allow it to spend more time 'on site' to complete inspections and surveys and liaise more closely with the CR and Mining teams in the field.

**Table 10-2: Summary of Findings, PS6**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
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.	Rehabilitation	<p>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.</p> <p>CBG should develop a work plan for its presidency of REB, including resource and cost information.</p> <p>The IESC notes that IFC is interested in attending a REB meeting as an observer if possible.</p>	<b>Moderate</b>
July 2020_036	Mine Rehabilitation	<p>A key factor limiting progress in rehabilitation is availability of mined land and equipment provided by the mining department.</p> <p>The PbP approach works very well at a plateau level, however at a concession/landscape level the PbP is a less effective approach. In order to address this, a landscape level assessment should be developed to work in parallel with the PbP approach.</p>	Rehabilitation	<p>In order to meet both its target to reduce the ratio of active mining:rehabilitated land to 1:1, and its 5-year catch-up target, senior management to implement measures to ensure swifter provision of land post mining, with equipment when needed, in order to allow timely rehabilitation..</p> <p>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 should be to provide strategic guidance to location and focus of rehabilitation, community development, and on-site conservation activities.</p>	<b>High</b>
July 2020_037	Collaboration with GAC	Successful collaboration with GAC is key for the success of the Boulléré onsite offset as	All	Need for closer collaborative working, on the offset, to be raised to a higher management level in CBG's discussions with GAC, to help	<b>Moderate</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
		the offset area crosses concession boundaries.		ensure the success of the offset, to the benefit of both companies.	
July 2020_038	Dredging Report	CBG needs to consolidate the results of its 2019 dredging activities into a single report to meet the DMP requirement. It seems from discussions that the dredging was completed largely in compliance with the DMP, however the IESC needs a consolidated report to verify this.	Operation	Prepare and provide a 2019 dredging report	<b>Minor</b>
July 2020_039	Marine Surveys	New marine surveys are required in order to ensure that the baseline is sufficiently robust, both temporally and spatially, to inform future activities such as the planned dredging in 2021 and, also, conservation efforts to deliver No Net Loss/Net Gain.	Operation	Surveys must be completed in a timely manner prior to future dredging activities/use of new dredge spoil disposal site(s).	<b>Moderate</b>
July 2020_040	Base location for Biodiversity team	The Biodiversity team is based in Kamsar and make long journeys to Sangarédi for any site work or meetings. Being based in Sangarédi would allow the team more flexibility to work to the best of its ability.	All	The Biodiversity team should have a permanent base in Sangarédi as well as one in Kamsar.	<b>Minor</b>

## 11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

### 11.1 Introduction

CBG is implementing the Cultural Heritage Management Plan (CHMP) and the implementation of this Plan was investigated during the VSV.

### 11.2 Cultural Heritage Management Plan: implementation

The CHMP, approved in January 2019, contains an Action Plan with 19 actions; 9 of which are continuing. Seven actions due to begin 2019 were postponed to 2020.

As of 30 June 2020, an analysis of implementation progress showed the following:

Status of Actions	Number of actions
Completed	5
Not Started	4
Ongoing	1
Continuing	9

The 5 completed actions are:

- CR team access to shared GPS device (individual hand-held devices not yet available);
- Development of data collection surveys for cultural heritage and application in the field;
- Organise, within the CR team, a meeting to present and discuss the various steps of the CHMP including the Chance Finds Procedure (CFP);
- Preparation of a presentation on cultural heritage approach and management for dedicated CBG employees such as Mine and HSECQ department staff members;
- Delivery of training to Mine employees (Mine planning, mine operations and CR teams) and contractors' workforces (Nitrokemine and Geoprospect) in February 2020. 16 employees attended the training, of whom 3 were women.

One action, concerning the development of material on cultural heritage to be included in the HSEC induction process for new employees and contractor workforces, is almost completed (awaiting final review and approval by the CR Manager). Work on the ongoing/continuing actions proceeds, but not constantly. Work is done at discrete times.

The 'not started' actions are:

- Share all cultural and archaeological heritage knowledge and data (including GIS) with COBAD, including any new data as it becomes available (with approval of communities);
- Integrate Multi-User cultural heritage data in the Cultural Heritage Register;
- Include cultural heritage management clause in relevant contractor and third-party workforce contracts (mine); and
- Prepare 2020 monitoring report for CHMP Action Plan and KPIs.

The first of these actions cannot be implemented to date, as there are no new data to share with COBAD; thought this could change in the future. The second of these actions is no longer considered to be applicable by the CR team. There are no additional cultural heritage data, arising from the work to complete the MUOA ESIA Report, so no MUOA data to include the Cultural Heritage Register.

The PbP approach and the Land Disturbance Permit process both now integrate, fully, cultural heritage into the decision-making process leading to internal approval of actions resulting in land

disturbance. A recent example is the work done to delimit the mining area for the mining of the Tiapikhouré plateau. Figure 11-1 presents a 'constraints' map of the plateau and all sites of cultural heritage are mapped (red dots) and, also, access routes to these sites are recorded in accompanying text.

There are no findings arising from the VSV requiring corrective actions.

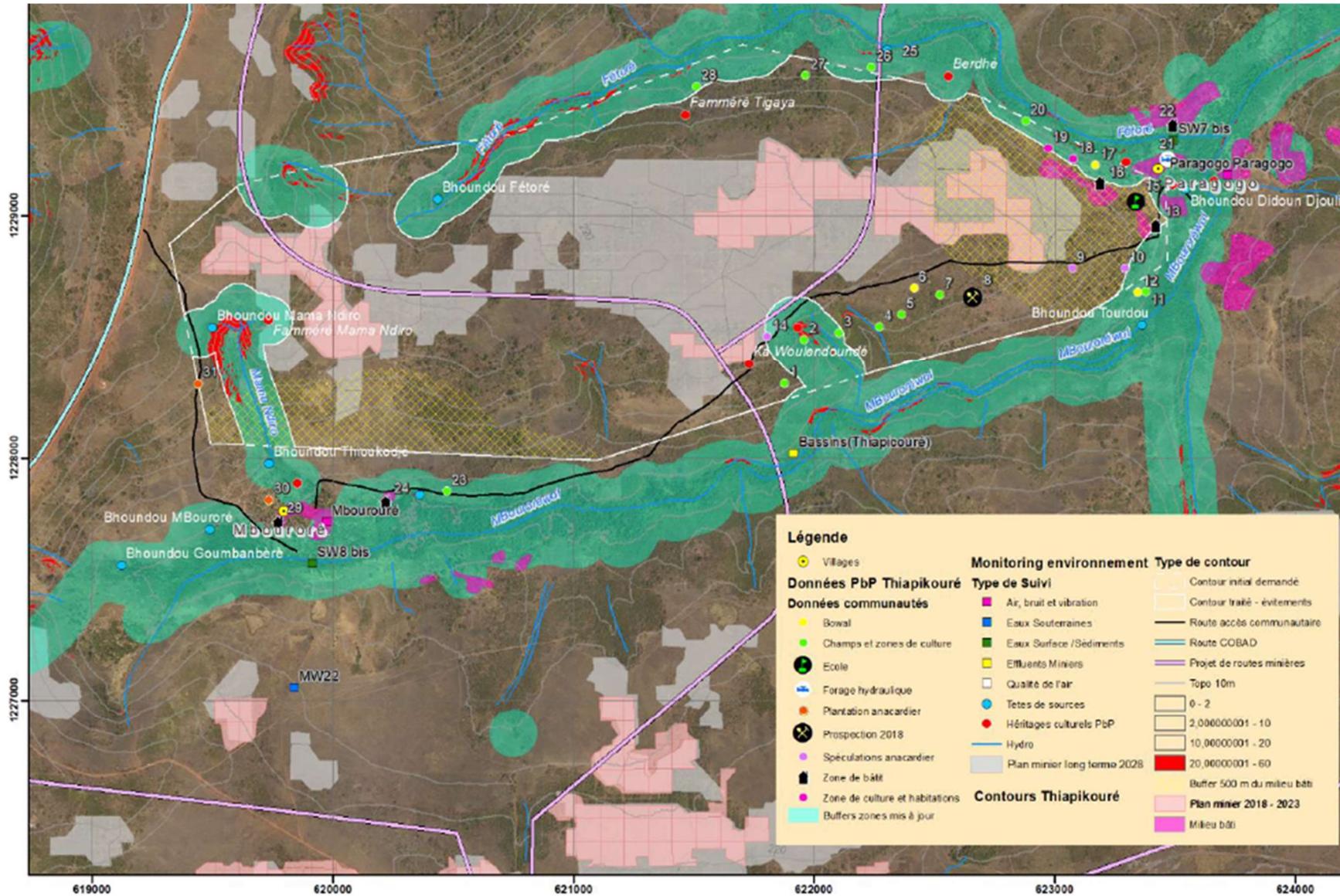


Figure 11-1: 'Constraints' Map of Thiapikouré plateau showing location of cultural heritage features (red dots)

## **APPENDIX 1**

### **VIRTUAL SITE VISIT ITINERARY**

<b>Site visit itinerary</b>						
						* indicates a priority item
<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
<b>General</b>						
Kick off meeting	all parties	Tues 14th	09.30	08.30	1	
Project status update including latest on mine plan (presentation from CBG) Measures to deal with COVID-19 (staff and external parties)	all parties	Tues 14th	10.30	09.30	1	Presentation from CBG in advance - inclusive of photographic images Current mine plan
SMB rail	all parties	Tues 14th	11.30	10.30	1.5	Latest inspection reports Presentation from CBG in advance - inclusive of photographic images
* HSECQ Resourcing	all parties	Tues 14th	14.30	13.30	0.75	
COBAD Road	all parties	Tues 14th	15.15	14.15	1	Presentation from CBG -status update
Application of LDP/status of master document and LDP procedure	all parties	Tues 14th	16.15	15.15	1.5	GIS presentation/other materials as per previous visits/master LDP document. Master document and LDP Procedure (latest version) LDP register and any permits since July 2019 visit.
<b>HSE</b>						

<b>Site visit itinerary</b>						
						* indicates a priority item
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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Management system	CH, NM CS, BV	Wed 15th	09.30	08.30	1	ISO re-certification (was due March 2020) - provision of certificates
H&S reporting (review of KPIs)	CH, NM CS, BV, BO	Wed 15th	10.30	09.30	1.5	KPIs to date Evidence of actions taken to prevent rocks falling from crusher (see previous site visit report issue 2019_002) Training matrix and records.
Incident follow up - derailments	CH, NM, AB, FH, BO	Wed 15th	11.30	10.30	1	Status of corrective action implementation
Emergency Response	CH, AB, FH, BO	Wed 15th	12.30	11.30	1	Action plan showing current status of actions therein. Emergency response exercise reports since July 2019 (for main exercises conducted)
* Air Quality (implementation of plan) plus air monitoring	CH, JPB, AB, CS, BV	Wed 15th	14.30	13.30	2	Action plan showing current status of actions therein. Further discussion about stack emissions monitoring and finalisation of AQMP Monitoring records
Audit and inspection	CH, NM	Thur 16th	1630	1530	1	2019 and 2020 audit programmes/list of audits performed to inform audit reports to be selected by IESC  some examples of environmental inspections carried out.
<b>HSE</b>						

<b>Site visit itinerary</b>						
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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
* Water Quality (implementation of plan) inclusive of monitoring	CH, Plan champion, AB, BV	Wed 15th	0900	0800	1.5	Action plan showing current status of actions therein. Monitoring records (with accompanying sampling locations) * Update on remedial actions for the oil water separator (the one at the tank farm) Photographic evidence of settling pond for primary crusher Photographic evidence of upgrades to Sangaredi WTP
Transport and safety management – Road and Rail Safety	CH, RB RC (for rail) AB, FH (for Road)	Thur 16th	1030	0930	1.5	Action plan showing current status of actions therein.
Noise and Vibration	CH, Plan champion, AB, BV	Thur 16th	1430	1330	1	Action plan showing current status of actions therein. Monitoring records
Waste Management	CH, Plan champion AB, BV	Thur 16th	15.30	14.30	1	Action plan showing current status of actions therein. Waste records. Photographic evidence of waste sites (duplicating locations in IESC site visit July report 2019)
Environmental monitoring (air, noise, water, vibration)					0	To be covered in other environmental sessions
Mine closure and reinstatement - POSTPONED UNTIL WEEK 2 WITH BIODIVERSITY SESSIONS	CH, RB, Plan champion	<del>Thur 16th</del>	0000	0000	1	Action plan showing current status of actions therein Progress against target for reinstatement of mined land (catch up targets) Map showing reinstated areas/areas scheduled for reinstatement (included as part of a presentation?)
<b>HSE</b>						

<b>Site visit itinerary</b>						
						* indicates a priority item
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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Resource use and energy efficiency	CH, Plan champion	Fri 17th	09.30	08.30	1	Action plan showing current status of actions therein.
Management of Change	CH, FG	Fri 17th	10.30	09.30	1	MoC register
Dredging	CH, AF, JR	Fri 17th	11.30	10.30	1	CBG to advise on any dredging undertaken/planned for 2020 or 2021
Hazardous materials management	CH, Plan champion, BV	Fri 17th	14.30	13.30	1	Action plan showing current status of actions therein.
Contractor management	CH, NM	Fri 17th	15.30	14.30	1	List of current contractors and their roles/activities in 2020
Contingency		Fri 17th	16.30	15.30	1	spare time - mop up time.
<b>SOCIAL</b>						
*Staffing and other resources (if not covered in 'General' session on this topic): Specifically, the Community Relations (CR) team: - CR team : Current staff resources (functions/locations; HSEC review of the CR staffing situation...as necessary, preparation of a time-bound recruitment plan, vehicle	RB, CG, CS, AM, BO	Wed 15th	09.30	08.30	1	List of all current positions (filled/not filled). Brief statement of actions underway to fill positions; Copy/ies of job description/s for vacant positions Plan/s for additional positions/recruitment; Names of consultancies/other entities currently retained to provide support and duration of contract. Summary table of shareholder support, for community relations and resettlement, provided in 2020 year-to-date (calls? Visits? Internal review of docs?)

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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
availability - Shareholder support						
* HR Manual and Code of Ethics and Business Conduct - Status; Workers Grievance Mechanism: - update on implementation (#, types; status: # open or closed.....) - dissemination and implementation of HR Manual and Code of Ethics - Actions undertaken and planned; - 'Collective Bargaining Agreement' and Trade Union activities - update	RB, Nmac, AM	Wed 15th	11.00	10.00	0.75	Copies of current versions of the HR Manual and Code of Ethics.....; Analysis of worker grievances with current status for 2019 and 2020 year-to-date: open or closed; work underway to close open grievances and types of grievances (top 3 issues in terms of number of grievances)
* Expansion Project demobilization - Status Update: - Final payments to workers - any problems/how resolved - Contractor audits?	RB, AM, FS (IESC understands that demobilization was managed by Phase 1 Project not HR Department)	Wed 15th	12.30	11.30	0.75	Audit reports (or similar) on contractor management of demobilization especially related to final basic pay, end-of-service entitlements such as bonus payments and/or allowance payments (if applicable), and 'letters of recommendation'.

<b>Site visit itinerary</b>						
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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Stakeholder Engagement actions: - COVID-19 impact of engagement activities - Coastal/island villages consulted (outcome of engagements with fishing villages + description of engagements with other relevant stakeholders (NGOs, media, etc) - Any changes of direction/emphasis (e. g. more rail/MUA) - Challenges; emerging trends in community concerns	RB, AM, BO, FS, CG, HD, AB	Wed 15th	14.30	13.30	1	Action Plan for Stakeholder Engagement 2019-2020; PPT presentation on Stakeholder Engagement for the period January to June 2020
Grievances and <i>Doléances</i> : 2020: Update/Status and close- out of 2019 Grievances and responses to/resolution of <i>doléances</i>	RB, AM, FS, CG, HD	Wed 15th	15.30	14.30	1	PPT presentation (if possible); Sections of grievance and <i>doléance</i> registers for the period January to June 2020

<b>Site visit itinerary</b>						
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<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Transitional Measures Plan (TMP): - implementation of measures - status; - community consultations since 01 May 2020: #/locations; outcomes; and any resulting changes to CBG/CFB 'plans' - performance evaluation results (PDCA - Road and Rail Safety Management Plan: MUOA-related amendments (see above under HSE)	RB, AM, BO, FS, RC	Wed 15th	16.30	15.30	1	PPT presentation (if possible) or update on status of measures in TMP (the table of 19 measures)

<b>Site visit itinerary</b>						
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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Community Health and Safety Management Plan: - implementation: actions implemented/completed; in progress; still to be implemented; - results to date (e.g. actions completed successfully) - malaria prevention programme review – results - Telibofi: fencing and safer crossing - status	RB, AM, BO, FS, CG	Thur 16th	12.00	11.00	1.5	Action Plan showing current status of actions; Records. Photographic evidence of actions/results; Report on assessment of the existing Malaria Prevention Programme undertaken up to end 2018 and summary of amendments to the Programme; Examples of information and training materials, supplied to security personnel, on the Voluntary Principles on Security and Human Rights ; Example of records of screening and background checks of security provider personnel;
Cultural Heritage Management Plan (CHMP) and Chance Finds Procedure (CFP); - implementation: actions implemented/completed; in progress; still to be implemented; - results to date (e.g. actions completed successfully) - integration with PbP approach and issue of Land	RB, AM, FS, CG	Thur 16th	14.30	13.30	1	Copy of the current Cultural Heritage Site Register and maps of identified cultural heritage sites with community access routes (MUOA sections of railway, non-MUOA railway sections and port, and Concession Area); Minutes of internal CR meeting to present and discuss the various steps of the CHMP including CFP; Number of communities (by mine, port and railway zones) and other stakeholders informed about CBG's cultural heritage management approach and potential risks; Copy of monitoring report for CHMP Action Plan and KPIs for 2019

<b>Site visit itinerary</b>						
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<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Disturbance Permits (sites and community access routes to sites)						
Local Content Management Plan (LCMP)	RB, AM, FS, NMac, CG	Thur 16th	16.30	15.30	1	Breakdown of workforce by origin (expatriate and Guinea/local) 2019 and 2020 year-to-date); Breakdown of purchases in GNF (and USD ) by origin of purchases (local/Guinea/international) and proportion of purchases that are local; Guinean and international from total purchases for 2019 and 2020 year-to-date; Summary of results to date of efforts to form partnerships to provide new financing options for SMEs.
<b>SOCIAL</b>						

<b>Site visit itinerary</b>						
						* indicates a priority item
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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Community Development Plan	RB, CS, AM, BO, JK, CG	Fri 17th	09.30	08.30	1	Report on Impact evaluation of community projects funded by CBG (2013-2018); List of KPIs for CBG's community Investment contributions; 2020 targets set for Community Development projects and programmes focusing on CBG inputs, outputs to be generated, and outcomes/impacts anticipated; Number of communities (by mine, port and railway zones) and other stakeholders informed about CBG's implementation of the Community Development Plan and specific Community Investments in 2019 and 2020 year-to-date; Copy/ies of annual Communications Plan for community investments for 2019, 2020 and 2021, as applicable ; and Copy of monitoring report for CDP Action Plan and KPIs for 2019
Influx Management Plan (IMP)	RB, CS, AM, JK, CG	Fri 17th	11.00	10.00	0.75	Action Plan showing current status of actions; Establishment of a multi-stakeholder engagement process for managing and monitoring project/operations-induced in-migration and data collection and consultations undertaken in at-risk areas; Summary of actions completed and/or underway for remote monitoring of population growth; Evidence showing actions to control speculative activities in the Concession Area; Copy of monitoring report for IMP Action Plan and IMP KPIs for 2019

<b>Site visit itinerary</b>						
						* indicates a priority item
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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Security Management Plan: - actions implemented/ completed; in progress; still to be implemented - results to date (e.g. actions completed successfully) - recent incidents/unrest in 2020 to date - contractor practices with own security providers - how supervised by CBG - summary of MUOA security arrangements, especially at points (aiguilles and at vehicle and pedestrian crossings)	RB,, AdM Or Plan Champion, AM, JK	Fri 17th	14.30	13.30	1	Table with number of security providers (contracted by CBG) and locations of deployment plus # of guards (male and female) Audit reports (or similar) on security providers Any report on security matters that CBG is willing to share with IESC/Lenders
<b>Resettlement</b>						
*Hamdallaye resettlement and livelihood restoration: completion of housing and community facilities, move and moving allowance/assistance, water supply (iron removal and	FG, SC, AM, JK, BO	Tues 14th	2pm to 6pm	1pm to 5pm	4	Progress report on Hamdallaye resettlement. CBG response to NGO 'Inclusive Development' allegations if available. Photographs and/or video

<b>Site visit itinerary</b>						
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<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
users committees), sanitation, lighting, demolition of old Hamdallaye, plantations at resettlement site, availability of agricultural land, road to agricultural land, status of reclamation of agricultural land for livelihood restoration, allocation of replacement agricultural land to individual households, support to gardening and other LR activities, current CECI team and budget in respect of support to Hamdallaye livelihood restoration						
Fassaly Foutabhé RAP commitments and livelihood restoration: completion status of bridge, well (iron removal) and school, livelihood restoration activities	FG, SC - AM, JK, BO	as above	as above	as above	0.50	Progress report.
*NGO Report: - NGO report and Hamdallaye relocation	FG, SC, AM, JK, BO	as above	as above	as above		CBG response to NGO 'Inclusive Development International ' allegations ,if available. Photographs and/or video (received)

<b>Site visit itinerary</b>						
						* indicates a priority item
<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
- Discussion with local NGO to hear their concerns first hand - Discuss with CBG improvements it intends to make (i.e. better documentation, more broad-based communication/ engagement, improvements in surveying and timing of surveying, etc)						
<b>Resettlement</b>						
*Kankalaré: compensation to host communities (footbridge, wells), livelihood restoration, Telibofé/Kankalaré school issue	FG, SG - AM	Wed 15th	10am to 12nn	9am to 11am	1.5	Progress report.
*Tiapikhouré: progress, compensation delivery, livelihood restoration	FG, SG - AM	as above	as above	as above	0.5	Progress report.
Update on use of Streamlined Compensation Approach to Parawi 2a and Bouroré 1a and 1b. Status of LRP development	FG, SG, AM, JK (as soon as available)	as above	as above	as above	0.5	Any updated compensation rates issued by Government if applicable Information on matrix and how it is updated/to be updated

<b>Site visit itinerary</b>						
						* indicates a priority item
<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
<b>Resettlement</b>						
Streamlined Compensation Approach: cumulated numbers of land (hectares) and landusers (number of households) affected from 1st July 2019 to 30 June 2020 under Streamlined process. Discussion of description of Streamlined approach and related CBG commitments as reflected in current LRF	FG, SC - AM, JK	Wed 15th	2pm to 6pm	1pm to 5pm	1	Updated LRF if available (further to Ramboll's May 2020 comments)
*Resources: description of current implementation resources (budget, staff numbers and functions/locations, vehicles, compensation monies timely available, budget for consultant support), database, identification of any gaps, Shareholder support	FG, SC, AM, JK	as above	as above	as above	2	Updated organization chart of Resettlement- related personnel resources (permanent, fixed-term or under other type of contract)

<b>Site visit itinerary</b>						
						* indicates a priority item
<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Grievance management: basic indicators of GRM operation, establishment of a mediation mechanism, avenues for lodging a grievance and potential interference by local authorities	FG, SC, AM, JK	as above	as above	as above	1	Grievance log updated as of 30 June 2020
<b>Resettlement</b>						
*Progress Status on PRAMS + schedule (CECI's livelihood restoration programme) - in context of COVID-19 restrictions - and approach to resuming 'normal' operations as quickly as possible;	FG, SC, AM, JK (12/1 pm onwards)	Thurs 16th	10am to 6pm	9am to 5pm	0.5	CBG/CECI 'Contingency Plan'

<b>Site visit itinerary</b>						
						* indicates a priority item
<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Gender: Update on extent of female representation and female inclusion in Resettlement Committees and other community-related meetings to discuss resettlement-related issues; reporting/recording on proportions of males/females participating in all consultation events (not just resettlement-related); #s of grievances raised by males/females. Information on any training to Resettlement team members on importance of achieving gender balance in all consultation events	FG, SC, AM, JK (12/1 pm onwards)	as above	as above	as above	0.5	Gender disaggregated statistics of consultation attendance and grievances
Update on use of Streamlined Compensation Approach to Parawi 2a and Bouroré 1a and 1b. Status of LRP development	FG, SC - AM, JK (12/1 pm onwards)	as above	as above	as above		

<b>Site visit itinerary</b>						
						* indicates a priority item
<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
*Mining Plan and future areas to be impacted by mining operations in 2021 and, if possible, up to 2025; with sequence of actions; compensation process and livelihood restoration to be applied on the operational areas to be impacted by future operations in compliance with the revised CRPF – (including Kagnèka Haul Road; land area to be affected (ha) and # of PAPs) Potential for physical relocation.	FG, SC - AM, JK, BO (12/1 pm onwards)	as above	as above	as above	1	Table of known areas/plateaux to be mined with #/name of affected communities , populations, area to be affected (ha) and type of displacement expected by area/plateaux
<b>BIODIVERSITY</b>						
Discussion of Example Biodiversity Inspections.	JR + Bio team members as appropriate	week 2	TBD	TBD	1.5	CBG to provide package of information including inspection reports location plans and photographs if possible
Discussion of SMB inspections findings	JR + Bio team members as appropriate	week 2	TBD	TBD	1.5	CBG to provide package of SMB information including inspection reports location plans and photographs if possible

<b>Site visit itinerary</b>						
						* indicates a priority item
<b>Scope is Expansion project Phase 1 and Operations, excluding MUOA</b>						
<b>Topic</b>	<b>IESC/PL personnel &amp; CBG interviewees</b>	<b>Date</b>	<b>UK time</b>	<b>Guinea time</b>	<b>Est. duration of call (h)</b>	<b>Document request</b>
Discussion of PbP	JR + Bio team members as appropriate	week 2	TBD	TBD	2	Demonstration of PbP GIS in real time if possible - teams call?
Discussion of progress of rehabilitation - To include Social team in a broader discussion around the mine reclamation plan	JR + Bio team members as appropriate	week 2	TBD	TBD	2	Plans as relevant
Terrestrial aquatic habitats	JR + Bio team members as appropriate	week 2	TBD	TBD	1	
Discussion of Chimpanzee work	JR + Bio team members as appropriate	week 2	TBD	TBD	1.5	Any further reports other than recent Sylvatrop report
Discussion of Offsets and how CBG intends to progress these following the BMS update.	JR + Bio team members as appropriate	week 2	TBD	TBD	1.5	Plans as relevant
Dredging	CH, AF, JR	week 3	TBD	TBD	1	

## **APPENDIX 2**

### **KEY PROJECT DOCUMENTATION MADE AVAILABLE FOR REVIEW**

<b>Ref no.</b>	<b>Document Title</b>	<b>Organisation</b>
1	Objectifs et indicateurs de performance CDP 2020 (CDP Objectives and Performance Indicators)	CBG
2	Évaluation de L'impact des Projets d'Infrastructures Sociocommunautaires Finances par a CBG (2013 – 2018): Rapport Initial (author: Guide SA for CBG) (Evaluation of CBG's community investment projects during the period 2103 -2018)	CBG
3	Attendees lists - Training on Voluntary Principles on Security and Human Rights (Contracted Security providers and, for the military, training on use of firearms in relation to respecting human rights)	CBG
4	Action plans (x2) for recruitment of two additional staff members for the Community Relations team in 2020	CBG
5	Registre recapitulatif des sites d'heritages culturels (summary of all registered cultural heritage sites with key data)	CBG
6	CHMP: Maps of identified cultural heritage sites with community access road	CBG
7	Accueil Santé Sécurité Environnement Communautés : Eléments communautaires (induction for new employees containing guidance on cultural heritage issues)	CBG
8	Plan d'action de reduction de la consommation d'eau (action plan to reduce water consumption)	CBG
9	Process Verbals (Minutes of Meetings) (x3) for community-level consultations for the MUOA Transitional Measures Plan, in July 2020)	CBG
10	Assessment road/transport-related risks (PPT-based)	CBG
11	Example of a security incidents report	CBG
12	Exemple de Rapport de service (Example of Security Inspector's report)	CBG
13	Contenu de formation à l'attention des gardes (training topics for security guards)	CBG
14	Assorted procedures/forms related to vehicles/driving and road safety	CBG
15	2020 Maintenance Dredge LDP and associated documents	CBG
16	2019 Maintenance Dredge Noise Monitoring Results	CBG
17	LDP documentation for MUOA OH33	CBG
18	Scope of Works for TBC Review and Update of BMS	CBG
19	190. Mesures d'urgence contre Coronavirus_MàJ_27042020	CBG
20	14 - 07- 2020_COVID-19 Management Reporting	CBG
21	20190605 CBG-HSEC-Permis de dragage	CBG
22	GHG emanations calculation methology	CBG
23	Green House Gases 2019	CBG
24	PbP D390-GEN-MET-001 FR V00 comm SD_SM_UpdEG8_Jr_MLB_vf	CBG
25	2019-02-27-CBG-HSEC- Procédure LDP_EG (1)_Jr_MLB_VF	CBG
26	2020-07-08_27-Rapport d'inspection Chantiers SMB .	CBG

<b>Ref no.</b>	<b>Document Title</b>	<b>Organisation</b>
27	23-01-2020 CBG _Rapport investigation_biodiversité_Route_COBAD_2020	CBG
28	120220_Compte Rendu-Visite Tracé route_COBAD (003)	CBG
29	PV Rencontre CBG-COBAD sur Projet Route 4 km 09012020	CBG
30	2020-06-24_CBG-Inspection -Banc d'emprunt	CBG
31	No 3a MU Management of Change Register May-2020	CBG

## **APPENDIX 3**

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

### Appendix 3.1 - Status of Issues raised in July 2019 site visit report

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
July 2019_001	HSEC Resources	The HSEC team has been missing two key positions since January 2019: <ul style="list-style-type: none"> <li>HSEC Manager; and</li> <li>Resettlement Manager.</li> </ul>	Operations / PS1	As a priority CBG must continue its efforts to secure suitable candidates for these managerial positions. <i>Post visit note: IESC understands offers have been made for both positions.</i>	<b>Moderate</b> (increasing to High if positions remain unfilled)	<b>Closed</b> (These two positions are now filled).
July 2019_002	HSE performance – falling rocks	Loose stones/rocks on mezzanine floors, stair wells and other accessible areas appeared to have fallen from height, probably during unloading of wagons by the tippler, and would therefore have been capable of causing serious injury.	Operations / PS2	CBG should investigate the source of the rocks. If these are found to have fallen from height, measures need to be put in place to prevent further falls and restrict access to dangerous areas where rocks might fall.	<b>High</b>	<b>Superseded</b> (see July 2020_Section 6.2.2)
July 2019_003	HSE performance - Diving fatality	A detailed incident report following the death of a diver in CBG's port recommended a number of actions to minimise the risk of diving incidents.	Construction and Operations / PS2	All recommendations made within the incident report should be fully implemented, including the appointment of a professional diving firm for any future diving activity and procurement of a suitable aqua drone to reduce the need to use divers.	<b>Minor</b>	<b>Closed</b>
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.	<b>Moderate</b>	<b>Open</b> (unable to close via VSV)
July 2019_005	E&S Management Plans	Implementation of tasks specified in Actions Plans (embedded within Management Plans) is behind the schedule for a significant number of actions.	Operations / PS1	Timeframes specified in the Action Plans should be revised. Lenders must be informed in accordance with the Management of Change Procedure.	<b>Moderate</b>	<b>Superseded</b> (See July 2020_003)

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
July 2019_006	Plateau-by-plateau approach	<p>During the July 2019 visit the IESC was informed that the plateau-by-plateau reference document was undergoing review by senior discipline leads.</p> <p>To date CBG has not performed modelling studies in support of the plateau-by-plateau approach.</p>	Operations / PS1	<p>The reference document should be finalised a matter of priority.</p> <p>Any decision not to perform environmental modelling in support of the plateau-by-plateau approach needs to be justified and agreed with Lenders.</p>	<b>Moderate</b>	<p><b>Closed</b> (Reference Document finalised).</p> <p><b>HOLD</b> (to be updated in final version of this report)</p>
July 2019_007	Community Relations (CR) Department staffing	<p>Arising from the IESC's July 2019 monitoring visit, it is clear that a significant proportion of CR team time and resources are devoted to non-core activities and that several key core activities, stakeholder engagement; community grievance management and community investment projects are not receiving the necessary attention.</p>	All / PS1	<p>CBG (preferably HSEC Director if in place) to review the staffing situation, irrespective of whether the planned addition of two new staff members in 2019 occurs, in the context of the expected role/workload for the CR team and the role and size of similar departments in other mining companies in Guinea and other west African countries (benchmarking). Should the review indicate a need for additional staff then, CBG to prepare a time-bound recruitment plan to achieve the required complement of staff and that such recruitment be accepted by CBG senior management and be included in the HSEC budget for the next financial year.</p>	<b>High</b>	<p><b>Superseded</b> (See July 2020_005 and _006)</p>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase / Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
July 2019_008	Stakeholder Engagement Plan (SEP)	The SEP is time-bound (with an 'end' date of September 2017); however, as an interim measure, CBG has prepared two Action Plans for 2017 to end 2018, and for 2019.	All / PS1	CBG to update and re-issue the SEP as soon as possible.	<b>Moderate</b>	<b>Superseded</b> (See July 2020_007)
July 2019_009	Community grievances	There is a lack of clarity in the recording of some grievances and community requests for assistance ( <i>doléances et préoccupations</i> ) and their descriptions differ according to the format. Although these formats are designed to present data in specific contexts, this variation increases the likelihood of errors occurring.	All / PS1	CBG to increase supervision of recording and tracking of grievances and community requests for assistance to ensure that the recorded data in the respective registers are accurate and consistent over time.	<b>Moderate</b>	<b>Superseded</b> (See July 2020_005 and _006. CBG is purchasing bespoke digital platform for managing social risks – recording of grievances will no longer be based upon Excel spreadsheets).
July 2019_010	Emergency Response Plan	Periodic emergency response exercises are a key component of the ERP. Emergency exercises should reflect the changing nature of the Project's risk profile.	Operations / PS1	CBG should consider an emergency exercise that includes the medical evacuation of personnel from within the crusher pit, for example, evacuation of an unconscious casualty from a mid-level platform.	<b>Minor</b>	<b>Closed</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase / Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
July 2019_011	SMB railway	SMB has received permission, from the Government to initiate certain early works, relating to the proposed railway through the southeast corner of CBG's South Cogon concession.	Operations / PS1	CBG should continue to engage with SMB and the Government to strengthen the existing collaborative working relationship such that it can maximize its influence on SMB's E&S performance within the CBG concession. Also, CBG needs to keep Lenders informed about the management of E&S matters, preferably via provision of written inspection reports produced by CBG or the Bureau Guinéen d'Études et d'Évaluation Environnementale. CBG's responsibilities in relation to the SMB rail project, insofar as they are specified in the CTA, should also be clarified.	<b>NA</b>	<b>Superseded</b> (See July 2020_004)
July 2019_012	Contractor/Sub-contractor labour and working conditions (LWC) management	CBG only applies, currently, a passive management approach to LWC management of contractors and sub-contractors.	All / PS2	Once the HR Manual is in place, the HR Director to prepare a brief implementation action plan to ensure that CBG will be able to put into effect the requirements of both the HR Policy/HR Manual and the Contractor Management Plan. This action plan to include capacity-building for key staff and, as necessary, revision to existing functional responsibilities.	<b>Moderate</b>	<b>Superseded</b> (See July 2020_013)
July 2019_013	Workers' Grievance Mechanism	MUA workers met at two MUA work sites in Kolaboui and Kamsar stated that they had no knowledge of a	All / PS2	CBG to require all its contractors, with immediate effect, to reinforce the message to both their own staff,	<b>Moderate</b>	<b>Closed</b> (For MUA contractors).

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
		workers' union (and the identity of their union representative), or that this union was able to assist them if that had a grievance. Workers did not know the way by which a grievance could be submitted.		and to sub-contractors, that CBG operates a procedure whereby workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.		Superseded (For all contractors- see July 2020_010 and _011).
July 2019_014	Oil water separator discharge	Oil concentrations downstream of the oil water separator continue to breach Project Standards.	Operations / PS3	CBG should confirm its preferred solution for upgrade of the oil water separator and action the upgrade as soon as possible. Progress in this regard should be reported periodically to Lenders.	<b>Moderate</b>	<b>Superseded</b> (see July 2020_017)
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 strong supports this measure.	<b>Minor</b>	<b>Open</b>
July 2019_016	Air quality – stack emissions monitoring	Technical problems were encountered during the phase 1 stack emission monitoring. Furthermore, operating conditions at the time of sampling were not fully representative of normal operating conditions.	Operations / PS3	During future stack monitoring campaigns <ul style="list-style-type: none"> <li>• Sampling ducts must be free of dust/obstructions prior to the start of the sampling campaign;</li> <li>• Sampling probes must be of the correct length to ensure representative sampling;</li> </ul>	<b>High</b> (high on the basis that validity of monitoring results is critical to the finalisation of the Air Quality)	<b>Superseded</b> (see July 2020_014)

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
				<ul style="list-style-type: none"> <li>Operating parameters must be representative of normal operating conditions, including normal variability (changes in fuel volume/fuel type/water use); and</li> <li>Operating parameters, for example volume of bauxite dried, volume and composition (sulphur content) of fuel burnt and volume of water injected via the scrubbers must be accurately recorded during sampling. Also, sampling relative to the maintenance of scrubbers (clearing of water jet nozzles) should be known.</li> </ul>	Management Plan)	
July 2019_017	Air quality – stack emissions reporting	There was a period of several months between phase 1 sampling and reporting. Similar long timeframes following Phase 2 and 3 sampling campaigns will jeopardise finalisation of the Air Quality Management Plan before the end of 2019.	Operations / PS3	CBG must ensure the company contracted to undertake stack monitoring is able to produce subsequent reports in a timely manner to ensure finalisation of the Air Quality Management Plan in accordance with timeframes specified in the waiver agreement. Such timeframes must allow time for IESC/Lender review of a draft AQMP prior to the end 2019 deadline.	<b>High</b> (high on the basis that this is critical to completion of the Air Quality Management Plan)	<b>Superseded</b> (see July 2020_014)

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase / Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
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.	<b>Minor</b>	<b>Open</b>
July 2019_019	Hamdallaye resettlement - sanitation	Resettlers will not be used to the type of toilets and showers they are receiving as part of resettlement housing.	Operations / PS5	Organise training of residents (including women and children) on toilet and shower utilisation.	<b>Moderate</b>	<b>Closed</b> (Training has been delivered).
July 2019_020	Hamdallaye resettlement – drinking water supply	Six drilled wells with a hydro-pneumatic handpump ("Vergnet") have been completed. No testing for iron content and bacteria has occurred.	Operations / PS5	Water should be tested for iron content and bacteria, and iron-removal devices should be provided, if necessary, prior to any relocation of households to the new village site. [Post-visit Note: CBG has informed the IESC as follows, " <i>The sample of the tests on water quality does include both microbiological and chemical parameters including "iron".</i> Also, CBG confirmed a new campaign of water testing in all the 6 boreholes of Hamdallaye by the end of September 2020.]	<b>Moderate</b>	<b>Closed</b> (see Post-visit Note opposite).
July 2019_021	Hamdallaye resettlement – drinking water supply	Training of users and linkage to existing maintenance are critical to long term sustainability of handpumps.	Operations / PS5	Form water users committee and linkage to be established with the national pump maintenance system, including private repairmen	<b>Moderate</b>	<b>Closed</b> (training has been delivered).

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
				("artisans-réparateurs") and certified spare parts dealers.		
July 2019_022	Hamdallaye resettlement – school and clinic	Experience in Guinea suggests that timely allocation of teachers and medical personnel to new schools and health facilities may be problematic.	Operations / PS5	Engage at high-level with the Ministries of Education and Health to facilitate timely allocation of staff to the Hamdallaye resettlement site school and clinic prior to completion of the relocation process.	<b>Moderate</b>	<b>Open</b> (Teachers are already teaching in the school; however, the Health Centre staff have not been appointed yet).
July 2019_023	Hamdallaye resettlement – school	Experience in Guinea suggests that where no housing is provided to teachers, they may not stay.	Operations / PS5	Ensure that houses are built for teachers at the Hamdallaye resettlement site prior to completion of the relocation process.	<b>Moderate</b>	<b>Open</b> (Houses are not yet built, CBG expects the houses to be completed by the end 2020).
July 2019_024	Hamdallaye resettlement – move	Current progress of construction at resettlement site may not allow to meet planned move period (November 2019).	Operations / PS5	Review progress of construction works at the resettlement site and implications to timing of the relocation.	<b>Moderate</b>	<b>Closed</b> (Planned move has occurred).
July 2019_025	Hamdallaye resettlement – move and transition	CBG's policy related to moving and transition support is not fully clear.	Operations / PS5	Devise a policy with regards to moving and transition support taking consideration of guidance in Section <b>Error! Reference source not found.</b> : <ul style="list-style-type: none"> <li>The move should best be planned to occur in successive waves of one or several lineages at a time; the exact date of the move for each wave should be notified to the community at least four weeks in advance;</li> </ul>	<b>Moderate</b>	<b>Closed</b> (The move is completed and, overall, was well managed).

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
				<p>in the case of Hamdallaye, it seems adequate to plan the move over a total duration of about three weeks, in three waves of three days each (with the remaining two days of each of the three weeks as a contingency);</p> <ul style="list-style-type: none"> <li>• A moving allowance in cash should be paid some time before the move (ideally about two weeks); this moving allowance can be calculated either on a per household basis, or on a per individual basis; as a reference, GAC, a neighbouring bauxite mining operation, pays USD 200 per household, which has been calculated to cover the hire of a tricycle and two labourers for several days;</li> <li>• On top of this allowance, specific transport assistance should be provided to identified vulnerable households; this should include the provision of transportation, assistance to demolition and salvaging,</li> </ul>		

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
				<p>and possibly medical assistance should some people be in a medical condition that may be exacerbated by moving; and</p> <ul style="list-style-type: none"> <li>A defined period (for example, e.g. 30 days from the official date of move) should be allocated to the community for salvaging of their construction materials, with the demolition taking place shortly thereafter. Demolition should preferably be undertaken by community workers specifically hired for that purpose, with health and safety supervision (key information on the activities to occur in this period, and timelines, to be disclosed to community members.</li> </ul>		
July 2019_026	Hamdallaye resettlement – livelihood restoration	<p>The plots envisaged for household gardens, the 56 ha land plot earmarked for land-for-land compensation and the 22 ha parcel meant for IGAs are not in a condition conducive to agriculture.</p> <p>Recontouring is not fully adequate (or fully complete) and topsoil has either not been put in place or is of</p>	Operations / PS5	Retain an experienced land reinstatement specialist and/or agronomist to review soil characteristics at all sites to determine what measures could be taken, prior to any relocation occurring, to make the soil cultivable. Trees (mainly fruit trees) are currently being planted with	<b>High</b>	<p><b>Closed</b></p> <p>(Following a soil suitability survey and recommendations, considerable progress has been made with land rehabilitation being underway in these land areas since March 2020.</p>

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
		inadequate quality. Also, CBG has commissioned a soil suitability study for the 56 ha plot. Should the study results confirm the IESC's view on soil suitability then this is a threat to achieving livelihood restoration success.		varying success. This will have to be monitored. Should the agronomists review and the soil suitability study results confirm the IESC's view soil suitability for crop agriculture and shade trees, CBG to implement remedial measures which may include <i>inter alia</i> the following actions (1) seek inputs from restoration specialists in CBG's mining department, (2) improve the reinstatement of the land accordingly, then (3) carry out an additional soil analysis on the final soil profile, then (4) proceed with fertilisation (such as organic matter and mineral fertilisers), as necessary, based on the soil analysis results of the final soil profile.		Agriculture is being practised in the 56 ha area. However, the IESC understand that land improvement works will continue until March 2021).
July 2019_027	Hamdallaye resettlement – Tree planting in public places (and shade)	Trees planted in public spaces have lower chances of success as no-one is responsible for their care.	Operations / PS5	A solution to this issue should be discussed with the Resettlement Committee (for example, allocate the responsibility of every public tree to one clearly identified school child living nearby).	<b>Minor</b>	<b>Closed</b> (A concerted tree planting effort is underway, with Biodiversity team inputs, and will continue into 2021).
July 2019_028	Kankalaré resettlement – RAP	The RAP does not include a livelihood restoration programme.	Operations / PS5	Devise a livelihood restoration programme for Kankalaré based on principles similar to those applied	<b>High</b>	<b>Open</b>

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
				for Hamdallaye and amend the RAP accordingly.		(Completion of the RAP +LRP delayed by COVID-19 restrictions).
July 2019_029	Kankalaré resettlement – measures for host communities	Limited progress on measures meant to offset impacts to host communities of Kankalaré resettlement.	Operations / PS5	Expedite planning and implementation of these measures: a road to Parawi village and for Telebofi: provision of footbridge over the railway; erection of fencing along railway for the stretch where the railway passes beside the village; and iron-removal devices for wells.	<b>High</b>	<b>Open</b> (No progress toward implementation of the required measures has occurred).
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.	<b>High</b>	<b>Open</b> (The LRP is being prepared, but not yet finalised).
July 2019_031	Kankalaré resettlement – loss of community school	A community school ceased to exist after relocation of Kankalaré residents leaving children from a number of small settlements without a school to attend.	Operations / PS5	Investigate this issue further (it is not mentioned in the current version of the Kankalaré RAP) and address it with relevant representatives of the Ministry of Education (perhaps in conjunction with the staffing issue related to the 'new' Hamdallaye school – see above).	<b>High</b>	<b>Open</b>
July 2019_032	Forthcoming compensation	Criteria for deciding on applicability of the 'streamlined compensation	Operations / PS5	Clarify criteria under which the 'streamlined compensation approach' is acceptable, agree these with IESC and Policy Lenders, and	<b>High</b>	<b>Open</b> (Revised Resettlement Policy Framework is

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase / Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
		approach' or another resettlement planning tool are not clear.		revise the Resettlement Policy Framework accordingly.		under review by Lenders/IESC but is not yet finalised).
July 2019_033	Land access, compensation and resettlement – Implementation resources	The approach to information management is currently inadequate in view of the magnitude of current and future land access exercises.	Operations / PS5	Consider the purchase of a dedicated IT solution enabling survey management, compensation, stakeholder engagement, and grievances, desirably with a link to a GIS.	<b>High</b>	<b>Superseded</b> (See July 2020_005 and _006)
July 2019_034	Hamdallaye resettlement – Gender and inclusiveness aspects	The current composition of the Hamdallaye Resettlement Committee does not include women or youth.	Operations / PS5	Include women and youth in the Hamdallaye Resettlement Committee and, also, in other such Committees established in the future.	<b>High</b>	<b>Closed</b> (The composition of the Committee includes representatives of women and youth).
July 2019_035	All activities – Gender and inclusiveness aspects	The CBG team do not necessarily require presence of women and youth in community meetings.	Operations / PS5	Ensure that the presence of women and youth is required at all stakeholder engagement events.	<b>High</b>	<b>Open</b> (Progress has occurred, but more needs to be done).
July 2019_036	Resettlement – grievance management	Some grievances are reviewed by the Commune before they are lodged with CBG.	Operations / PS5	Grievances should be lodged first with CBG and then reviewed with the Commune.	<b>Moderate</b>	<b>Open</b>
July 2019_037	Resettlement – grievance management	There is no formalised grievance recourse mechanism.	Operations / PS5	An impartial grievance recourse mechanism should be put in place and disclosed to resettlement-affected communities.	<b>Moderate</b>	<b>Closed</b> (Resettlement-related grievances are registered with all other community-related grievances and are managed under a PS1-compliant grievance

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
						management procedure).
July 2019_038	Biodiversity Management System	Review and Update of BMS.	PS6	CBG Biodiversity Team to complete review and update of BMS prior to current team manager leaving the role to work on the off-site offset. Additional deliverable required is a document justifying those actions now considered not to be relevant and/or undeliverable from the original BMS in order to inform the Management of Change Process.	<b>Moderate</b>	<b>Open</b> (The review and update are in progress, with a projected delivery date of mid-September)
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.	<b>High</b>	<b>Open</b> (CBG is working with a specialist eDNA company to progress eDNA surveys and is progressing a physical survey for freshwater fish).
July 2019_040	Biodiversity Manager	The current Biodiversity Manager will leave his position in mid-September and a replacement is required.	PS6	It is important that a new manager is appointed in order to maintain the good work of the biodiversity team. It was suggested by CBG during the visit that no new external manager be hired and instead the lead member of the remaining biodiversity team be promoted into the role. The IESC is broadly supportive of this proposal but	<b>Moderate</b>	<b>Closed</b> (New biodiversity manager is in post. He has previous experience of the role and the IESC is supportive of the hire)

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase / Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
				suggests that a level of external support/mentorship is sought.		
July 2019_041	Completed Biodiversity Monitoring Studies	A number of studies required under the BMS for various species have been completed. However, a vulture study remains outstanding.	PS6	The vulture study should be provided to the IESC and Policy lenders for review.  The IESC requests that the monitoring study reports be provided for review and comment as soon as possible. This includes the study of vultures at the Sangarédi landfill.	<b>Low</b>	<b>Closed</b>
July 2019_042	Boulléré KBA - Chimpanzee studies	Sylvatrop also completed a study of chimpanzees for GAC.	PS6	CBG should liaise with GAC to agree to work collaboratively on the subject of chimpanzees in the Boulléré KBA as it is likely to be the same group of animals using both concession areas. (This recommendation mirrors recommendation Dec 2018_33 which had not been completed by July 2019).	<b>Low</b>	<b>Open</b>
July 2019_043	Réseau Environnement Bauxite	CBG is taking an active role in the collaborative working group with other mining operators in the area.	PS6	CBG should continue to take an active role in the REB and where REB develops new documents regarding biodiversity, these should be shared with the IESC.	<b>Low</b>	<b>Ongoing</b> (Progress is good, CBG is currently leading the REB).
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	<b>Moderate</b>	<b>Open</b> (In progress, the tree growth continues well. The road is now largely

ID	Aspect	Issue Description	Phase / Standard	IESC Recommendations	Significance	Open/Closed (Current IESC Opinion in July 2020)
				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.		unpassable by car, only by motorcycle, bicycle or on foot)
July 2019_045	SMB Railway	SMB is constructing a railway through the south-eastern part of the South Cogon Concession area.	PS6	CBG has commenced and progressed dialogue with SMB to attempt to ensure that SMB's works within the CBG concession are as closely aligned with the CBG PS6 commitments as possible. This liaison should continue and SMB's activities continue to be monitored.	<b>Low</b>	<b>Open</b> (This is ongoing. The Biodiversity team participate in regular inspections).

### Appendix 3.2 - Status of issues raised in December 2018 site visit report (residual issues not closed out during previous site visits)

Note, issues previously categorised as either superseded or closed, as reported in the July 2019 IESC monitoring report, are not repeated in this table.

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2020)
Dec 2018_001	Audit programme	The current audit and inspection procedure is dated Jan 2014 and was scheduled for review in 2016. It is unclear whether the review took place.	All	The procedure should be reviewed and updated if necessary, to ensure it reflects current practice.	Minor	Open
Dec 2018_005	Community grievances	There are 4 legacy grievances that remain open.	Construction	CBG should decide soon whether there is a realistic possibility of closing any of the old open grievances, and if not, to close them officially. This action will require informing the complainant/s of the decision with reason/s provided and then recording the decisions (with reason) to close them in the grievance register.	Minor	Open (There is now only one grievance open and it is expected to be closed by the end of 2020. One of the other grievance entered the judicial process).
Dec 2018_009	Oil spill at the Filima power plant	CBG reported a Spill of 6437 litres inside the Filima Power plant via the GFA (a Class I Non-Conformance).	Operations	CBG to implement the actions identified in the incident investigation report. Furthermore, CBG should review the design of the fuel storage area, and in particular the need to elevate large volumes of fuel at height.	Minor	Open (HOLD -Pending information on corrective actions implemented).
Dec 2018_010	Waste management – temporary storage areas adjacent to secondary	The volumes of stockpiled wastes have increased significantly. A number of housekeeping issues are observed: Unlabelled drums; Hydrocarbon staining;	Construction	CBG should improve practices at this and other temporary storage areas, for example, labelling of hazardous storage areas and general house-keeping to reduce safety hazards) and expedite removal of wastes to be	Minor	Ongoing (Improvements have been made but efforts to further improve housekeeping,

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2020)
	crusher and elsewhere	Trips hazards; Likely VOC emissions from open drums; and Poor signage on shipping containers intended for temporary storage of hazardous wastes. Elsewhere, spent oil for use as fuel for the dryers is stored in in sealed metal containers but without secondary containment.		recycle by external service providers e.g. the large volumes of scrap metal witnessed.  The large volumes of used oil being stockpiled in the dry season, prior to use as fuel for the burners in the wet season, should be stored in dedicated areas with secondary containment.		management of wastes is required).
Dec 2018_011	Waste management – Sangaredi landfill	Anecdotal evidence was provided indicating that people scavenge from the site once security personnel are off duty.	Operations	CBG should confirm whether people are scavenging when the guards are not present and review the effectiveness of the security presence and the risk posed to community members in the light of its findings. In the event people are scavenging in hours of darkness, the effectiveness of the security presence, in terms of protecting human health, should be reviewed.	<b>Minor</b>	<b>Open</b> (IESC notes the site will be secured as part of a planned upgraded of the site. CBG has reported no evidence of scavenging at night).
Dec 2018_013	Noise mitigation – surface miners	The surface miner was broken at the time of the visit. The possession of a single surface miner represents a risk to CBG’s ability to implement the key noise mitigation measure in proximity to sensitive receptors i.e. where use of surface miner is required in place of blasting.	Operations	CBG should expedite the intended procurement of additional surface miners to ensure breakdowns/maintenance of surface miner(s) does not limit ability to implement noise mitigation.	<b>Minor</b>	<b>Open</b> (CBG currently has 1 surface miner awaiting repairs and no short-term plan to procure additional units).

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
Dec 2018_ 015	(Potential) Relocation of Hairé Hounsiéré Woyoh	The herder settlement of Hairé Hounsiéré Woyoh is considered to be 'abandoned'. There is a possibility that the herders may return as the current period of herd movement, within the regular herding 'cycle', may not yet be completed.	Construction and Operations/ PS5	CBG to check, at least monthly, for a period of 12 months from end April 2018, to determine whether the 'abandonment' of Hairé Hounsiéré Woyoh may be reasonably considered to be permanent.	<b>Moderate</b>	<b>Closed</b>  (No herders have returned during the 12- month monitoring period).
Dec 2018_ 016	Access to agricultural land for new Hamdallaye site	Safe access to agricultural lands – in particular, the Démourou valley– is required for Hamdallaye villagers.	Construction	Consult with Hamdallaye Advisory Committee and residents about the intended safe access route and ensure that agreement/validation is reached and recorded (in the form of a meeting Minute ( <i>Procès Verbal</i> )).  Senior management to confirm, that the current option for provision of access has been approved, as quickly as possible and that finance and personnel resources are available to provide the manpower to manage the road/rail crossing effectively.	<b>Moderate</b>	<b>Closed</b>  (The access roads to Hamdallaye agricultural land in areas known as Demouroudji Vallley, Kounsi Djjerè and Ndangara Forest are substantially complete).
Dec 2018_ 017	Provision of shade for new Hamdallaye village site	Following the failure of the campaign to plant acacia <i>spp</i> in 2107, there is a need to ensure that shade planting occurs.	Construction	Ensure shade planting is commenced as planned (at beginning of the wet season), after careful examination of the species to be used and the timing, techniques and post-planting management needed to ensure the maximum survivable rate.  In the interim, CBG to consider provision of a number of shaded communal structures as part of infrastructure provision for the new village site	<b>Moderate</b>	<b>Superseded</b>  (See Issues: ID July 2019_026 and 2019_27 in Table 9.1 above).

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
Dec 2018_ 018	Community asset replacement for Fassaly Foutabhé villagers	New school needs to be approved by Government and requires pupils from Mbouroré to make it viable.	Construction	Maintain and strengthen efforts to ensure school is viable and then proceed to construction of the school.	<b>Moderate</b>	<b>Closed</b>
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.	<b>High</b>  (increased to High because relocation almost completed and there is no PS5-compliant RAP in place)	<b>Open</b>  (Progress delayed by COVID-19 Restrictions).
Dec 2018_ 020	Land acquisition	Implementation of strategy of land-for-land for certain Hamdallaye residents.	Construction and Operation/PS 5	CBG to proceed to implement the strategy taking into account the results of the soil suitability survey and resulting consultations with the affected people.  If soil proves not suitable (and cannot be rectified) and/or affected people reject the strategy, then alternative PS5-complaint compensation will be provided	<b>High</b>  (Reducing to Moderate/ Low following implementation of the strategy)	<b>Closed</b>  (Strategy being implemented – see items ID July 2019_026 above).
Dec 2018_ 021	Institutional capacity	The Resettlement Manager lacks permanent in-house technical support and ability to obtain external support promptly as /when needed	Construction and Operations / PS5	CBG to provide resources, as a priority, to release the Resettlement Manager from implementing a range of technical resettlement tasks thus freeing time to manage current	<b>Moderate</b>	<b>Superseded</b>  (See July 2020_005).

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in July 2020)
				activities and plan for future resettlement actions.		
Dec 2018_022	Parawi-Koobi Plateau bauxite 'cleaning' and mining	A Resettlement Action Plan or Livelihood Restoration Plan is required	Operations / PS5	CBG to prepare a PS5-compliant Resettlement Action Plan or Livelihood Restoration Plan for displacement resulting from mining of this plateau – as determined by the INSUCO study	<b>Moderate</b>	<b>Superseded</b> (PAPs incorporated into the Kankalaré RAP).
Dec 2018_023	Telibofi and Parawi villages and returning/relocating people/households	A livelihood restoration programme for displaced people from the Kankalaré hamlets (including those considered to be vulnerable) is required by the Gap Analysis Report. Other villagers (acting as 'hosts' for non-natal individuals/household relocating to the village) will not be entitled to participate in this programme if they had no affected assets. This could cause intra-village social tensions.	Operations / PS5	CBG to revise its risk analysis (relating to these two villages) by adding the risk of intra-community disharmony resulting from application of livelihood restoration measures to certain, but not all households in the villages. Specific measures may need to be formulated and applied to manage any additional risks, as necessary.  CBG to consider risk of social tensions and if assessed as being likely to occur consider extending livelihood restoration measures to all villagers.	<b>Moderate</b>	<b>Open</b>
Dec 2018_024	Human-wildlife conflict at Kagnaka village	During the last dry season a conflict arose between villagers and chimpanzees using the nearby spring.	PS6	Continue to monitor human wildlife conflict and consider discussing with villages optimum timings of use to avoid future conflicts.	<b>Moderate</b>	<b>Closed</b> (A separate well has been made available for villagers to use, thereby avoiding conflict. Some villagers continue to use the spring as the preferred water collection point).

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
Dec 2018_ 025	GIS Mapping	Development of a comprehensive and detailed GIS Ecological and Community Constraint Maps.	PS6	A GIS database has been initiated however a comprehensive and detailed GIS Ecological and Community Constraint Maps need to identify important biodiversity features, exclusion zones, Critical Habitat and rehabilitation areas. A separate map should show community ecosystem services, incentivised areas, problem areas.	<b>Low</b>	<b>Ongoing</b> (Good progress is being made).
Dec 2018_ 026	Aerial/satellite imagery	Ground conditions are constantly in flux and changing. Regular updated aerial or satellite imagery would assist Biodiversity and Social Teams with their planning and identify key issues.	PS6	An aerial or satellite imagery acquisition programme should be established, and data updated regularly e.g. every 3, 6 or 12 months. Ensure most cost-effective approach is adopted and challenge the market place.	<b>Minor</b>	<b>Closed</b> Satellite imagery is bought and updated annually
Dec 2018_ 027	Rehabilitation Programme	The rehabilitation programme has been delayed by a number of minor issues which could have been overcome.	PS6	The IESC recommends that focus is maintained and that the programme is properly started in 2019. Clear lines of management need to be established between Mining Operations and the Biodiversity Team.	<b>Moderate</b>	<b>Superseded</b> (See July 2020_35)
Dec 2018_ 028	Social and Biodiversity cooperation	Community matters impacting Critical Habitat	PS6	CBG should further its current efforts to ensure greater cooperation between the Biodiversity and Social teams in order to address issues which arise and impact on both people and/or Threatened species and Critical Habitat and wider biodiversity issues.	<b>Moderate</b>	<b>Open</b> (Ongoing. In particular, there are instances where the biodiversity team could help the social team with regards to rehabilitation of

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
						proposed resettlement villages).
Dec 2018_029	Boullère/COBAD Road river crossings	Exposed river banks caused by excavation/construction works.	PS6	Rehabilitation efforts should continue, to ensure that silty run-off does not occur in the wet season, when further excavation/construction activities are scheduled as part of the restoration of river bank profiles.	<b>Moderate</b>	<b>Open</b>  (Ongoing. From photos shared with the IESC and Heavy rains and high river flows have prevented good rehabilitation of the river banks. The Kewewol Bridge is currently submerged and partially washed away. The Bodiwol bridge is intact. Erosion appears to be ongoing around both.
Dec 2018_030	Community Nursery and tree stocks	Community Nursery has become overgrown with weeds and has not been maintained.	PS6	The contract which covers the Community Nursery programme has expired and one of the nursery plots was overgrown with weeds. The IESC recommends that a maintenance contract is started to ensure these areas are cared for and maintained.	<b>Moderate</b>	<b>Closed</b>  (Framework contract in place for management of nurseries).
Dec 2018_031	Rehabilitation tree stocks	CBG has been holding a stock of 100,000 trees for more than a year.	PS6	It is important that a system is developed to ensure timely planting of trees and tree stocks are not held in pots over the dry season (thereby potentially weakening tree saplings).	<b>Moderate</b>	<b>Closed</b>  (Good progress with rehabilitation).

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard/ Phase</b>	<b>IESC Recommendations (from December 2018 Report)</b>	<b>Significance</b>	<b>Open/Closed (Current IESC Opinion in July 2020)</b>
Dec 2018_ 032	Community para-Botanists	Consider widening role to encompass Biodiversity.	PS6	Encourage and advise community para-botanists to develop their own Enterprise or NGO in order to supply services to CBG. Consider making them Trainers to develop wider network.	<b>Low</b>	<b>Closed</b>  (The para-botanists have set up their own company as suggested.)
Dec 2018_ 033	Biodiversity surveys	Consider sharing data with GAC to broaden understanding of biodiversity in the area.	PS6	Exchanging and obtaining biodiversity data from adjacent concessions would assist CBG and their neighbour projects, increasing knowledge and encouraging cooperation.	<b>NA</b>	<b>Superseded</b>  (see July 2019_036).

### Appendix 3.3 - Status of Issues raised prior to the December 2018 site visit report

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

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in July 2019
Feb 2018 _007	Human Resources documentation	The required documentation has not been submitted to Lenders/IESC.	Construction and Operations / PS2	Prepare, approve, disseminate (as appropriate) and implement the required policies and procedures regarding employment practices and management of employees.	<b>Moderate</b>	<b>Superseded</b> (See July 2020_10; _11 and _13)
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> )).	<b>Moderate</b>	<b>Open</b>
Feb 2018 _026	Resources	The organisational structure of the Biodiversity Team residing in the Expansion Project HSEC team potentially reduces ability to implement change in CBG operations.		The Biodiversity team is situated within the Expansion Project HSEC team. It is clear that to effect significant changes to the environmental management of the mine, the Expansion Project capabilities and knowledge need to be transferred to the mine operations. This may require organisational restructuring. However, in the short term it is recommended that the biodiversity team efforts are more fully targeted to Sangarédi rather than Kamsar.	<b>Moderate</b>	<b>Superseded</b> (There is no longer an Expansion HSEC team, only CBG (Operations) HSEC team  [on the basis that the Biodiversity team was scheduled to move to Operations at end 2018, IESC expects this item to be closed in near future]).
Feb 2018 _029	Plateau-by-plateau management units /	Landscape planning for rehabilitation	All / PS6	The 2018-2023 rehabilitation plan does not set out the decision-making process required to define the most appropriate vegetation restoration technique. This	<b>Moderate</b>	<b>Open</b> (Ongoing. Significant progress has been

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in July 2019
	Rehabilitation Plan			detail has yet to be incorporated into the plateau-by-plateau management tool and is essential to ensure that the needs of local communities and for the restoration of natural (and critical habitats) are balanced.		made. Mining team and biodiversity teams working closely on PbP and habitat restoration progress has increased.  CBG on target to restore 179 ha in 2019, which is in line with the rehabilitation plan target of 150-250 ha per annum).
Feb 2018 _033	Review and update of the BMS	Need to agree BMS review process.	All / PS6	It is recommended that a review takes place 6-12 months into the main biodiversity programmes (before March 2018). It is recommended that the composition of the NVIVP is discussed with the Lenders.	<b>Minor</b>	<b>Superseded</b> (See July 2019_038).
Feb 2018 _034	Critical Habitats: fish	CBG have proposed that gallery forest is used as habitat proxy for fish.	All / PS6	Ramboll recommends that this issue is discussed further with the Policy Lenders to agree the approach.	<b>Minor</b>	<b>Closed</b> (See Section 10.8 above. Freshwater surveys will begin soon.)
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.	<b>Minor</b>	<b>Open</b> (Progress made. CBG undertook monitoring studies for the species on the island in 2018 and 2019 and the results will be used to

Ref	Aspect	Issue Description	Phase/ standard	IESC Recommendation	Priority	Status in July 2019
						develop a management plan for discussion with COBAD).
July 2017 _029	Access to school for pupils of Kankalaré hamlets and Telibofi	At present pupils from these communities attend Hamdallaye school. Once the village is relocated – the distance to school will be increased significantly.	Construction	Consider ways of ensuring that school enrolment and attendance by children of Kankalaré hamlets and Telibofi does not decline due to relocation of the Hamdallaye school.  Select and implement the preferred option so that no disruption to attendance occurs.	<b>Moderate</b>	<b>Open</b>  (Status remains unchanged since Feb 2018)
July 2017 _034	Routine Environmental Inspections	Inspection proforma does not systematically capture all of BMS requirements.	All	Update and enhance proforma and train environmental inspectors in relation to BMS aspects.	<b>Minor</b>	<b>Closed</b>  (Proforma revised and training provided).
July 2017 _035	Land Disturbance Permit	Land Disturbance Permit (LDP) proforma does not systematically capture all of the BMS requirements.	All	Update proforma.  HSEC team to monitor uptake of the LDP Procedure by CBG operations and record any instances of works not covered by a LDP.	<b>Minor</b>	<b>Open</b>  (Good progress however remains 'Open' pending receipt of the Plateau-by Plateau reference document).
July 2017 _038	COBAD Road	Restoration of river crossings yet to be initiated and no clear identification of responsible party to complete the works. Significant risk from sedimentation into gallery forest and watercourse critical habitats.	All	A restoration plan for the rivers needs to be developed. The responsible party to complete the works need to be identified and the budget made available.  Liaise with COBAD over works required to prevent sedimentation into gallery forest and watercourses.	<b>High</b>	<b>Open</b>  (Progress has been made since July 2017 on restoration, but additional works are still required)

<b>Ref</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase/ standard</b>	<b>IESC Recommendation</b>	<b>Priority</b>	<b>Status in July 2019</b>
						Issue to be revisited during next IESC monitoring visit).