

Intended for

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

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

Date

**March 2023**

Project Number

**1620009030-003**

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

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

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## ACRONYMS AND ABBREVIATIONS

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

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

<b>Acronym</b>	<b>Meaning</b>
SMB	Société Minière de Boké
SMPs	Social Management Plans
SNAPE	National Water Supply Point Management Services
SOP	Standard Operating Procedure
SO <sub>2</sub>	sulphur dioxide
ToR	Terms of Reference
VSV	Virtual Site Visit
WBG	World Bank Group
WMF	Waste Management Facility
WMP	Water Management Plan
WWTP	Wastewater Treatment Plant

## EXECUTIVE SUMMARY

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

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

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

A series of inspections, meetings and interviews were undertaken during the week commencing 5<sup>th</sup> December 2022. The meetings/interviews were held in person and involved representatives from the IESC, CBG, CBG contractors, stakeholders and the Policy Lenders.

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

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

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- Community health and safety:
  - Blasting Protocol;
  - Communicable disease prevention;
  - Health infrastructure;
  - Security; and
  - Rail and community health and safety;
- Biodiversity:
  - Resourcing levels;
  - Biodiversity inspections including land rehabilitation;
  - Biodiversity Action Plan (BAP);
  - Integrated Landscape Management; and
  - CBG supervision/monitoring of the SMB railway and the COBAD Road
- Resettlement
  - The implementation status of the Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP);
  - The status of Livelihood Restoration Plans (LRPs)
  - The update of the Resettlement Policy Framework;
  - Cumulative impacts;
  - Monitoring; and
  - Resettlement implementation capacity.

A list of High significance findings is provided below which provide specific examples of areas needing attention that were identified by the IESC during the December 2022 site visit. Many of these are repeat findings/are similar in nature to early findings and it has become apparent over the course of multiple IESC monitoring events that many findings result from systemic issues. These systemic issues were highlighted in the March 2022 report and are described below along with updates based on findings from the December 2022 visit.

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

The HSECQ team has historically taken on primary responsibility for a large range of E&S issues relying on other departments to implement actions/remedial measures. Whereas the HSECQ Departments role as the lead entity makes sense, it was apparent that the HSECQ's priorities were not necessarily shared by other departments, and HSECQ's leverage over the other departments was limited. The IESC has previously reported improved interaction and ownership by other departments resulting from implementation of the Road Map and associated monthly/quarterly coordination meetings. The appointment of Champions, supported by Sponsors (from different departments) for each environmental and social action plan is working well. Senior management support and other processes linked to implementation of the Road Map have continued and now matured resulting in shared priorities and good progress with many issues that had previously been held up.

#### *Procurement Department*

The IESC has previously reported on numerous delays resulting from the procurement of goods and services and recommended a detailed review of CBG's current procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services. No specific action has been taken in this regard, although the IESC does note that many of the earlier delays surrounding appointment of contractors and procurement of equipment have eased.

Delays in the clearance of imported goods from customs continue; with the exception of continued engagement with customs officials, CBG has no control over this issue.

### *Organisational capacity and resourcing levels*

The IESC has previously recommended an increase in HSECQ resourcing levels to provide Team leaders to delegate responsibilities and have sufficient 'head space' to make strategic decisions. Several new appointments have been made since the previous site visit which respond to the recommendation. However, turnover of key staff, particular for those on short term contracts is inevitable and greater effort should be afforded to the timely replacement/succession planning for E&S key posts.

### *Safety culture*

Efforts to improve the safety culture and safety performance continue to be made. As reported previously, significant safety improvement will result from the future signalisation upgrades for the railway and more recently the mine control centre, which uses GPS based real time tracking of all mine trucks and CBG is now trialling facial recognition devices which can alert the controller of driver fatigue, telephone usage and smoking whilst driving. CBG has also recruited additional H&S professionals and the 2022 safety performance has been better than in 2021 with no fatalities or serious injuries. However, at a local level, continued improvement is required, particularly in respect to internal inspection and audit, document control and record keeping, availability of safety documentation in site, asset integrity and incident investigation and close out.

A total of 51 new or updated findings (with accompanying recommendations) were identified during the December 2022 site visit. Of these, 13 are considered to have a 'High' significance, 33 are of 'Moderate' significance and the remainder are of 'Minor' significance. The High significance findings highlight those with relatively high risk of significant harm/non-compliance and the timing/urgency of actions needed to mitigate the actual/potential harm. In some instances, the findings are repeats of the same or similar findings made in previous IESC monitoring reports. Where this is the case, repeat findings are indicated with an asterisk (\*). Any change in the significance of an issue is also highlighted, where such a change is applicable.

### **High significance findings**

1. *Organizational capacity and competence.* The permanent Resettlement Manager post remains to be filled. In addition, the Environmental Monitoring Team Leader is due to leave CBG at the end of Q1, 2023. It is unclear whether he will be replaced by an external hire/there is a succession plan in place. CBG to continue in its efforts to recruit the Resettlement Manager and clarify its position with respect to the Environmental Monitoring Team Leader position and ensure smooth transition and transfer of knowledge to new members of the HSEC leadership team.
2. *Stakeholder engagement targeted at people with disabilities.* To date CBG has undertaken no specific engagement with People with Disabilities (PWDs). Thus, a more dedicated engagement with PWDs is required, also through involvement of NGOs working in the field.
3. *Disclosure of environmental monitoring results.* CBG has been working on the best approach to the non-technical dissemination of environmental monitoring results. However, limited information has been disclosed to date despite being a priority issue. Disclosure should therefore be expedited.
4. *Community Grievance Mechanism.* Some old 2020 and 2021 grievances from 2020 and 2021 have not been resolved. CBG to strengthen the capacity of the monthly HSECQ committee meeting to act swiftly to ensure that there are no institutional 'obstacles' to swift action in terms of: i) recognizing the legitimacy of the grievances; and then ii) putting in place the actions to close them as soon as possible.
5. *Environmental Management Plans.* Certain Environmental Management Plans have not been updated since January 2019, in part because updates were being linked to outcomes from the implementation of the Road Map/development of the integrated Management System. However, some plans are significantly out of date and cannot be used as operational management plans. A structured review of current EMPs is required.

6. *Drinking water quality at Fassaly Foutabhé.* Community members have complained that water from wells fitted with iron removal devices is not potable, a claim supported by visual inspection by Ramboll of one well. Furthermore, the stream at Fassaly Foutabhé continues to be highly turbid during the wet season/periods of rainfall severely limiting the village's access to clean water during high flow periods. CBG should prioritise close liaison with the community and SNAPE during further investigations and remedial works and be present when SNAPE undertake maintenance/repair or sampling from wells in Fassaly Foutabhé, CBG should also use its best endeavours to ensure results of the water quality monitoring are shared by SNAPE.
7. *OHS Management System.* There are several areas where earlier OHS findings are not being rigorously closed out/corrective actions enforced and therefore may result in the reoccurrence of similar serious events (fatalities, fatigue and maintenance management). Actions must be prioritised where necessary and closed out on a timely manner. Fatalities related actions should be presented separately in the reporting tables and in the committee reports with the Senior Management, so that targets and actions are also presented separately. Simplification and consolidation of multiple actions plans, combined with use of sharepoint (as the single documentation repository) is recommended.
8. *\* MUOA Project/railway safety.* Delays in the installation of fence and footbridges have resulted in ongoing risk of serious injuries/fatalities involving community members in urban areas. The fence is in-country although construction has yet to commence. Fence erection should be prioritised at those high-risk areas where footbridges have been completed.
9. *\*Cumulative impacts.* Cumulative impacts to a number of communities, including Fassaly Fouthabé, Parawi, Mbouroré, Paragogo are potentially high and may become difficult to mitigate, with the consequence of community dependency on CBG for survival (through continuous food assistance), a multiplication of grievances and an increase in NGO adverse advocacy. CBG should prepare a long-term assessment of the situation of mining and hauling cumulative impacts for the list of villages indicated as potentially to be resettled by 2022 in the 2015 RPF (Fassaly Fouthabé, Parawi, Guéguéré, Kagnéka, Horé Lafou, Sintourou Kourawel, Kourawel Center, Parawol Aliou and Parago) as they are villages likely to be the most impacted, plus Mbouroré which also appears to be surrounded in the mine plan.
10. Fassaly Fouthabé has officially requested its resettlement and in line with the results of the long-term assessment, consultations with the Community and with the lenders, CBG will have to make a motivated decision regarding the resettlement of the village.
11. *\*Hamdallaye and Fassaly Fouthabé RAP (Livelihood Restoration).* Despite CBG efforts to rectify management of the CECI Program and new important infrastructure investment, the results are still disappointing and will not allow for the restoration of livelihoods. CBG should:
  - acknowledged with the community the reluctance of members to continue with the bakery, small ruminants and grasscutters (only in Hamdallaye for the latter) activities and act on the termination of the activities and transfer of infrastructure.
  - Maintain market gardening and poultry activities but rethinking the model, and potentially find a new implementing partner, in order to make the activity sustainable and avoid breaks between production cycles. *Post visit note: The IESC understands a new implementing partner has been appointed for the market gardening.*
  - Broaden the scope of livelihood restoration to more non-agricultural activities, including vocational training relevant to "urban" and mining jobs, and small business development.
  - Target the youth, especially for the non-agricultural activities described above.
12. *Thiapikouré, Kankalaré, and MUOA LRPs* are now in the diagnosis or final program design stage with Phénix, the contracted implementer. First feedbacks are encouraging, however CBG should:

- Increase coordination between the CBG Resettlement, Phénix and CBG Biodiversity teams regarding LRP initiatives
- Assess the adequacy of Phénix’s resources to assist 1,000 PAPs on an individual basis.

13. \*The updated Resettlement Policy Framework (RPF), including updated compensation matrix, has been pending validation for more than two years pending agreement on its finalisation with the Lenders. A new revision schedule was approved during the site visit and should be followed to guarantee a rapid validation of the updated RPF. CBG would also benefit from including the RPF and associated RAP/LRPs into the CBG roadmap.

As indicated above, ‘Low’ and ‘Moderate’ significance issues are not summarised in this Executive Summary, but instead can be found in the summary tables of chapters 5 to 11. Findings made in previous reports that are not updated in the main body of this report, but instead are presented in Appendix 3 with a status update as necessary. Appendix 3 therefore provides a consolidated list of issues identified during previous monitoring visits that either remain ‘Open’ or have been ‘Closed’ or ‘Superseded’ since the previous report. Of note, out of 37 findings made in the March 2022 site visit report, 9 have been closed with the remainder either remaining open or superseded/updated. A further 7 findings that predate the March 2022 report have also been closed since the previous site visit.

A number of High and Moderate findings detailed in this report repeat the findings made in previous IESC monitoring reports. The table below provides a visual summary of these repeat findings and the change in significance rating over time. The summary is high level and does not capture progress being made towards resolving long lead time issues, for example, ongoing implementation/near completion of corrective actions plans. Progress towards resolution of the issues below is provided in the main body of the report. The findings the table below were not necessarily revisited in detail during the site visit, thus the findings listed above (based on latest the site visit) do not fully align with the issues listed in the table below. For those not listed above, details can be found in preceding IESC monitoring reports and in Annex 3 of this report.

These key findings will be revisited in subsequent monitoring cycles to track progress in the closure of findings.

**Tracking of recurring high and moderate significance issues**

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

**Scope Limitations and Exceptions of the Assessment**

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

Throughout the December 2022 site visit, CBG cooperated fully and responded to the IESC's requests in relation to its monitoring work. The IESC and its reporting is not subject to any material limitations, however, the findings expressed in this report are based primarily on information gathered at a moment in time during the site visit. The IESC focused on priority issues at the time of the site visit. Lower priority issues, which are not addressed in this report, can be considered in subsequent IESC monitoring visits.

## 1. INTRODUCTION

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

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

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

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

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

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

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

- Maintenance Department
- Mining Department; and
- Phase 1 Expansion Project (in relation to Dryer 4)

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

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

- **General:**
  - Status of the Phase 1 Expansion and MUOA Projects;
  - HSECQ structure and resourcing;
  - Current short-term mine plans and proposed CBG exploration activities within the South Cogon Concession Area and North Cogon Concession Area.
- **HSE:**
  - Status of HSE Management Systems;
  - H&S metrics and performance;
  - Audit and inspection programme;
  - Implementation of Management Plans, including those relating to: Air Quality, Noise and Vibration, Waste, Hazardous Materials, Dredging, Resource Use and Efficiency, Water Quality, Environmental Monitoring; and
  - Management of Change (MoC).
- **Social:**
  - Community Relations and Resettlement personnel resourcing and capacity development;
  - Performance of the IsoMetrix software platform for managing social and biodiversity risks;
  - Community health and safety (H&S), including communicable diseases, health infrastructure and rail-related H&S issues;
  - Blasting at the mine;
  - The scope and focus of stakeholder engagement;
  - Community grievance/doléance<sup>1</sup> management;
  - Community Development Plan
  - Cultural Heritage.
- **Resettlement:**
  - The implementation status of the Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP);
  - The status of Livelihood Restoration Plans (LRPs)
  - The update of the Resettlement Policy Framework;
  - Cumulative impacts;
  - Monitoring; and
  - Resettlement implementation capacity.
- **Biodiversity:**
  - Resourcing levels;
  - Biodiversity inspections including land rehabilitation;
  - Biodiversity Action Plan (BAP);

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<sup>1</sup> *Doléances* are community requests for assistance (such as improving a road, building a clinic, or providing a new well for water).

## CBG BAUXITE MINE

- Integrated Landscape Management; and
- CBG supervision/monitoring of the SMB railway and the COBAD Road

The site visit itinerary is provided in Appendix 1.

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

## 2. SCOPE AND STRUCTURE OF THE REPORT

### 2.1 Scope

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

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

- A review of ESAP implementation;
- A review of certain HSECQ Management System documents, notably agreed management plans;
- Review of recent Borrower's E&S Compliance Certificates for Q3 2022;
- Interviews held with key HSECQ staff within CBG;
- Interviews with CBG's contractors;
- Interviews with other CBG departments; and
- Meetings with community members affected by the MUOA Project and CBG's broader activities.

### 2.2 Project Standards

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

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

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

### 2.3 Structure of the Report

Section 3 provides a very brief description of the Expansion Project status, the MUOA Project status and other CBG activities. Section 4 describes how different levels of significance are attributed to issues highlighted in the report. The report is then structured around the seven IFC Performance Standards applicable to the Project, as listed above, and supporting WBG EHS Guidelines. The key findings identified during the December 2022 site visit and the IESC's recommendations to address them are summarised in 'significance tables' for each IFC Performance Standard at the end of each section.

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

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

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

### 3. PROJECT STATUS

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

#### 3.1 Status of the Expansion Project

In its previous site visit report (March 2022) the IESC reported that all Expansion Project works were complete and that only performance testing of Dryer 4 was required and scheduled for August 2022. During the December 2022 site visit the IESC was informed that remedial works necessary to ensure the dryer could operate reliably at 1200 mtph (as agreed in the Common Terms Agreement (CTA) and Second Amendment and Restated Agreement (SARA)) had been performed. The performance of the dryer was verified by the Lenders Independent Technical Advisor.<sup>2</sup>

On the basis that the residual issues relating to Dryer 4 performance have been resolved, all activities relating to the Expansion Project are considered to be complete.

#### 3.2 Status of MUOA Project

During the previous site visit (March 2022), the overall progress of the MUOA Project was reported at 64%. Progress in December 2022 was reported to be 68% complete (as of October 2022) with the same key tasks to be progressed, namely:

- Installation of permanent signalling and training - 51% complete with a scheduled end date (acceptance test) in November 2023;
- Construction of the locomotive maintenance workshop (10% complete with a scheduled end date September 2023); and
- Delivery of 7 remaining reconditioned SD40 locomotives, under the Phase 1 scope, scheduled for delivery in January and March 2023<sup>3</sup>.

Other notable developments include:

- The 12 railway footbridges, primarily located in Kamsar (8) and Kolaboui (2) are complete
- Repositioning of Kolaboui water pipe completed (April 2022)

The footbridge work was completed behind the original schedule (fencing and footbridges were originally scheduled for the end of December 2019 according to the Road and Rail Safety Management Plan). Erection of Betafencing in Kamsar and Kolaboui had not commenced at the time at the site visit, however the IESC was informed that contracts with local enterprises were in place and the Betafencing had been delivered to country and released by customs.

Thirty Technical Rooms (also referred to as 'Bungalows') were also under construction at the time of the visit to house signalling equipment along the railway.

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<sup>2</sup> Completion test confirmation certificate of remedial works for Dryer 4, RPM Global, 18 October 2022.

<sup>3</sup> 18 out of 25 locomotives ordered are already in services.

### 3.3 Status of South of Cogon activities

CBG’s internal approval process prior to the opening of new mining areas is governed by its Land Disturbance Permitting procedure and the issuance of a Land Disturbance Permit (LDP) prior to start of land stripping/mining. The status of LDPs mining at the time of the site visit was as follows:

Plateau	Status of LDP	Status of activity at the plateau
Ndangara et Koobi suite	Finalised	Stripping complete
Kagnaka haul Road	Finalised	Biodiversity assessment, baseline data collection, inventories, compensations and final draft LRP complete.
Kagnaka Plateau	Finalised	Biodiversity assessment, baseline data collection, inventories, compensations and final draft LRP complete.
Parawi 5 and 3a	Finalised	Biodiversity assessment, baseline data collection, inventories, compensations completed
Mbouroré Plateau	In progress	Inventories and compensations ongoing
Parawi 3b Plateau	Suspended	Remains suspended because of the speculative construction of buildings and commencement of economic activities in the affected area

In addition, an LDP for the Multi User Project (needed for additional platforms) has been finalised

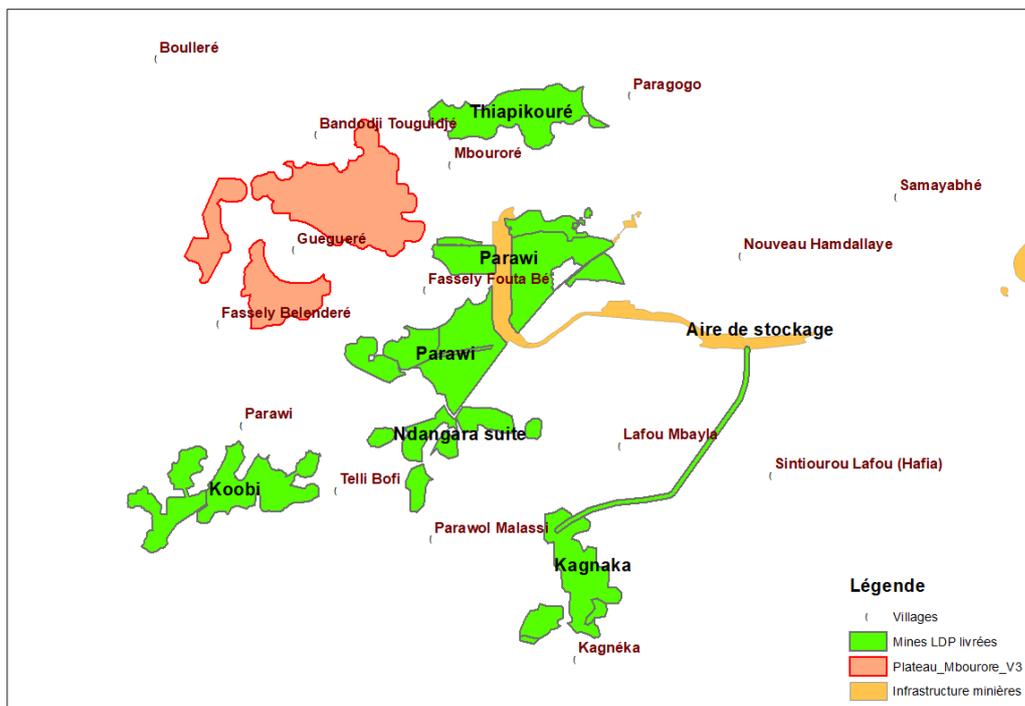


Figure 3-1: South of Cogon Concession Area – location of plateaux and status of LDPs

The mining of the Mbouroré plateau presents a number of environmental and social sensitivities (proximity to gallery forests and villages). Whereas the LDP is yet to be finalised, it is anticipated that exclusions and buffer zones will be required around villages and the Boullere Key Biodiversity Area (KBA).

The IESC has been informed of an additional LDP for an exploration Campaign in the South of Cogon concession. Four blocks are being investigated in the area north of the village of Mbouroré adjacent to the COBAD Road.

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

The IESC has been made aware of some exploration works North of the Cogon River and that any ongoing/future exploration works will be performed in accordance with CBG's Land Disturbance Permitting process (see previous IESC monitoring reports).

Access feasibility studies are being performed and a full international Environmental and Social Impact Assessment (ESIA) will be developed following analysis of feasibility studies if a decision is taken to mine the North of Cogon (NoCo) Concession Area.

As reported previously, at this stage no decision has been taken to mine the NoCo Concession Area. In the event CBG decides to seek international financing to mine NoCo, the impacts will be subject to a separate independent analysis; as such NoCo activities are largely outside of the IESC's current scope.

### **3.5 CAO Process**

The Project is currently subject to a Compliance Advisor Ombudsman (CAO) case, following the filing of a complaint against CBG in February 2019 relating to environmental and social matters, by local community members from 13 villages living in the area of Sangarédi. The Complainants and CBG are currently engaged in a dispute resolution process.

The dispute resolution process is a confidential process that is separate to the IESC's role. Consequently, the IESC is not involved, however it is aware of the process and the issues being discussed via minutes of meetings released in accordance with the terms of engagement agreed between involved parties. Consequently, this report makes reference on a number of occasions to the CAO process.

## 4. SIGNIFICANCE ASSESSMENT

### 4.1 Review findings

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

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

### 4.2 Assessment of significance

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

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

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

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

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

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

Time-critical issues measures can lead to a higher classification of significance. Conversely, high significance issues can be given a lower classification if measures are in place/in progress to address a concern.

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

ID	Aspect	Issue Description	Phase <sup>4</sup>	IESC Recommendations	Sign
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities. To date the Company has been unable to procure monitoring equipment – no monitoring has been undertaken.	Ops	<i>Company X shall Expedite procurement of monitoring equipment with the support of senior management.</i>	<b>Moderate</b>

<sup>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 HSECQ Resources

This section provides an update on HSECQ resources, including a discussion around senior HSECQ positions and the CR team. Additional commentary on resettlement-related resources is provided in Section 9.7.

#### 5.1.1 Senior HSECQ Positions

The IESC has reported the status of HSECQ resourcing in previous IESC monitoring reports. CBG's resourcing as of December 2022 is summarised below along with key findings/recommendations.

- Key leadership positions for Community Relations, Biodiversity and Environmental Monitoring are filled, however the current Environmental Monitoring Team Leader is due to leave at the end of March 2023 and CBG's replacement/succession planning is unclear;
- The Resettlement Manager's post remains vacant and is being fulfilled by the CR Manager with support from an experienced external resettlement specialist. CBG intends to appoint a full-time replacement Resettlement Manager and has offered the position to a preferred candidate. Unfortunately, the candidate did not accept and the post remains vacant. CBG has indicated it intends to continue the recruitment process: in the interim, the external specialist will continue to support CBG on resettlement matters;
- The HSEC Director<sup>5</sup> role continues to be fulfilled by the Deputy HSECQ Director (the Acting HSECQ Director); and
- Ongoing support from a number of consultancies (as reported previously) continues.

The IESC previously reported on the appointment of a new Operations Director and welcomed his involvement on HSECQ matters. The Operations Director was present throughout the recent site visit and continues to be closely involved with HSECQ matters.

#### 5.1.2 Overall HSEQ Organizational Structure

CBG plans to increase the overall size of the CR Team from 9 to 25 people from 2023 onwards through the appointment of the following new positions:

##### *Community Relations*

- 2 community engagement coordinators, based in Sangarédi and Kamsar
- 3 community relations advisors, 2 based in Sangarédi, 1 in Kamsar
- 1 monitoring and social infrastructure engineer, based in Sangarédi - resource shared with the resettlement team
- 2 Livelihoods advisors, based in Sangarédi
- 1 Monitoring and evaluation advisor, based in Sangarédi
- 1 Compensation Advisor, based in Sangarédi
- 1 Database coordinator based in Sangarédi - resource shared with the Resettlement team<sup>6</sup>

##### *HSE*

<sup>5</sup> HSECQ Director left his post in early 2021.

<sup>6</sup> The Database and GIS Manager reports directly to the HSECQ Director as shown in the HSECQ Organigram

- 4 HS advisors and 1 monitoring advisor

The figure below shows the updated organigram with the new planned hirings for the Community Relations (CR) team in red.

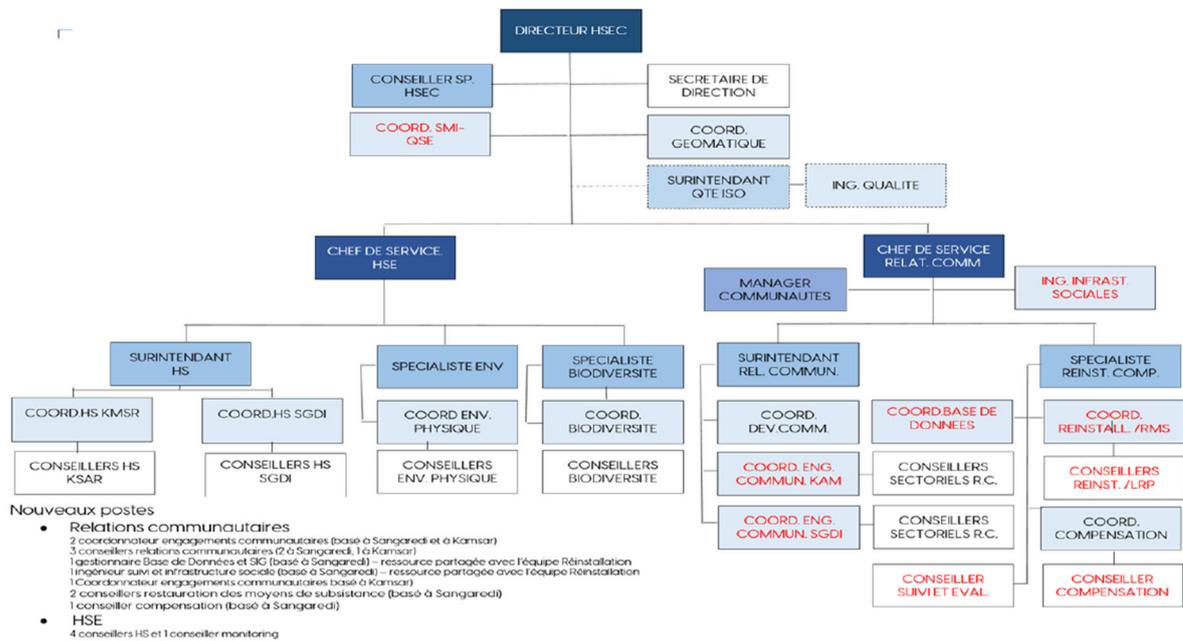


Figure 5-1: HSEQ Organigram as shared during the December 2022 Site visit

### 5.1.3 Resettlement Team

As noted in the March 2022 report, the Resettlement Manager’s post remains vacant and is currently being fulfilled by the CR Manager with external support. As of December 2022, the following additional resources are at the final stage of recruitment:

- Two LRP advisors;
- One Compensation Advisor;
- One Monitoring and Evaluation Advisor;
- One Social Infrastructure Engineer (shared resource with the CR team); and
- One Database Coordinator (shared resource with the CR team).

Framework contracts are still operational with INSUCO, SAMEC and SIGMA for assistance in the land disturbance process and/or LRP development. In relation to LRP implementation, a new provider, Conakry-based Phénix has been hired for the MUOA, Thiapikouré, Kankalaré and Contingency blocks LRPs.

### 5.1.4 CR Team

At the time of the December 2022 site visit, the CR Team was observed to be unchanged since the previous IESC site visit, under the leadership of the CR Manager. The CR Team based in Sangarédi has continued to be supported, on a full-time basis, by a staff member from the Mining Department of CBG. Such support has been provided by this staff member since March 2021 who continues to be focused mostly on blasting-related community sensitisation and consultation activities but also provide support for other CR Team activities. While this staff member should have become a formal member of the CR Team during Q2 2022, at the time of the December 2022 site visit, their formal appointment and internal transfer had not occurred. Once the recruitment process has been finalised, the new HSECQ organigram will become effective, showing the new official structure of the CR Team, including the additional resources recruited and the internal transfer of the staff

member from the CBG Mining Department. Upon completion of the internal transfer, CBG is recommended to revise the part of the organogram pertaining to the CR Team with details regarding the roles and responsibilities of the new team member accordingly.

Thus, based on the recruitment progress status reported by CBG onsite, by early 2023, the IESC expects the CR team to be expanded as per the planned recruitment process.

Since approximately July 2021, the CR Team has benefitted from external consultancy support provided by ACORN International under the terms of a 1-year renewable contract with the scope of their support to the CR Team including the following:

- monitoring of E&S Management Plans;
- update of ESAP deliverables;
- supporting with requests generated by the Compliance Advisor Ombudsman (CAO) mediation process; and
- Support for the position of resettlement specialist pending permanent recruitment.

No change in the reporting lines have been reported. Therefore, ACORN International continues to report to the Acting HSECQ Director with respect to all of their activities, except for in the case of support related to the CAO mediation process, where reporting is to the CR Manager. ACORN International's contract remains valid until December 2022. No information was shared during the December 2022 site visit in relation to contract renewal, and thus it is unclear as to whether and for how long such assistance will continue to be provided though it is considered likely. *Post visit note: IESC understands the contract has been extended for at least one further year.*

Overall, the ongoing recruitment efforts of CBG are considered positively by the IESC despite not yet being completed, for example, the review of allocation of staff between Kamsar and Sangarèdi aimed at responding to challenges concerning workload distribution. Further assessment of the CR Team's workload, also considering progress with the appointment of new staff / recruitment of additional resources, will be undertaken during the next IESC site visit.

#### *Equipment Resourcing and Training*

CBG selected the software platform IsoMetrix for social, resettlement, environmental and biodiversity data management. The software was installed on 29 January 2021 and training to the CR Team was delivered, alongside a member of the resettlement team<sup>7</sup>. Installation was planned in 2 phases, the first phase of which is now complete. Phase 2 (including the development of the 'dashboard') was launched but, as of March 2022, was on hold due to the problems with the overall performance of the IsoMetrix database.

To overcome the performance issues, a new server has been purchased which has now been installed in Kamsar. Database migration to improve its performance, previously expected to be completed by end of March 2022, was reportedly almost finalised at the time of the December 2022 site visit and planned to be completed by the end of December 2022. Based on CBG's documentation shared for review the 'Go live' was planned on December 6, 2022. This process is therefore expected to be completed by the end of December 2022. The IESC understood that CBG plans to have the database fully operational once the Database Coordinator is appointed (i.e. from January 2023). Furthermore, the CR Team reported the intention to re-design some IsoMetrix modules (such as the minutes of meetings and grievance forms) to enhance data collection.

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<sup>7</sup> IsoMetrix is being progressively rolled out to the different HSECQ teams starting with CR and Resettlement. Training for the Environmental Monitoring Team is expected to coincide with further roll out of IsoMetrix in 2023.

Given that it was installed in early 2021 and its full implementation was expected by Q3 2022, the database has thus not been used to its full potential for more than 1 year, with further delays recorded compared to the last IESC site visit.

Based on updated information shared by the CR team, all digital equipment (including all software and hardware) to enhance data collection in the field, which was planned to be purchased in 2022, has been delivered and is now at the CR Team's disposal. In particular, the following resources have been acquired

- Mobilization and allocation of a vehicle among the existing CBG fleet
- ARC-GIS infrastructure
- 'ENVI' teledetection software
- GPS Garmin 64 and Yuma
- Nomade devices for socio-economic data collection and collector for ArcGIS
- 5 cameras purchased.
- Process for additional radios is ongoing.

The acquisition of ArcGIS (as the chosen mapping and spatial data analysis solution) will particularly enable more precise data collection in the field by both the CR and resettlement teams and, subsequently, office-based data analysis and presentation.

#### Training (CR Team)

In 2022, CBG reported to have conducted the following training:

- Social Management for Participative and Sustainable Development in Mining Regions at the Centre of Social Excellence (CSE), in Yaoundé (4 months) and Guinea (6 months). The training started in May 2022 and is still ongoing and is undertaken by 1 member of the CR team in Sangarédi.
- Stakeholder Engagement including management of Grievance Mechanism organized by Ntrospective that was completed in May 2022 and conducted by 13 members of the social team (9 from the CR team, 4 from the Resettlement team).
- Local planning and development organized by the IFC Advisory, Guinea Mining Chamber and Canadian Government, completed in July 2022 by 4 members of the CR team.
- Leadership in health and safety organized by Dupont Sustainability Solutions which started in August 2022, still ongoing and attended by the CR Superintendent.

At the time of the December 2022 site visit, CBG confirmed, in line with the IESC's previous recommendation, to have applied the "train the trainer" approach with 4 events already organised for the whole CR/Resettlement team. Training events are reflected into the new training plan. In addition, in the attempt to minimise disruption to workloads whilst fulfilling training commitments, the CR Team is considering as new approach involving the hiring of interim staff to provide back-up support / coverage for absent members of the CR Team where they are undertaking training. Moreover, the CR team also hires interns to support the team. It is understood that the selection criteria for these interim staff and interns, who will be hired through temporary work agencies and will fall under the responsibility of the Human Resource (HR) Department, will include an appropriate academic background / qualifications (e.g. in the social sciences) and previous experience with CBG with the CR team providing a full job description to the HR Department to initiate recruitment.

It is recommended that the timeframe for such appointments also include shadowing periods to ensure appropriate knowledge transfer. While it is understood that the organogram for the CR team is only updated with official, permanent positions, careful timely planning of the temporary resources needed to support training is also required, in view of the foreseen training schedule.

Based on CBG’s documentation provided for the December 2022 site visit, a 2023 Training Plan has been prepared by CBG in September 2022 (not shared for review) inclusive of trainings to be provided by the IFC Advisory as per a 3-year agreement recently signed between the parties. Such agreement, which has been shared for review, is structured in 3 components to “support and help to increase CBG’s ability to better manage their social risks, gender integration into their operations, improve their relations with host communities, increase social resilience and livelihoods, therefore, increasing its social license to operate”:

- Component 1: Building the capacity of CBG staff on stakeholder engagement practice, including social impact mitigation and gender.
- Component 2: Strengthening the quality of CBG livelihood projects to strengthen and sustain CBG’s community investment approach, supporting the implementation of select community projects with consideration of gender-informed approaches for demonstration purposes.
- Component 3: Strengthening local content practices to support the operationalization of CBG local content plan and improve existing processes/procedures for engaging with local suppliers.

Such components might be subject to review based on a diagnostic work to be carried out as preparatory phase, including: (i) an assessment of CBG stakeholder engagement capacity and practices with key stakeholders (communities, donors, government, local institutions etc.); (ii) a training needs analysis for CBG staff to confirm or expend training required by the ESAP; and (iii) an evaluation of CBG’s past community economic projects with gender lenses”.

Reportedly, the 2023 Training Plan includes fewer key training topics/events (indicated as 10 by the CR team) in line with previous recommendations by the IESC. However, the IESC understands that the current version of the 2023 Training Plan does not contain provisions for a dedicated training session on Gender Based Violence and Sexual Harassment (GBVSH), which remains highly recommended. In addition, the current version of the 2023 Training Plan targets the social team only (i.e. CR and resettlement teams).

The 2023 Training Plan does not include training targeting colleagues from other departments on key topics such as managing grievances; it is understood that the CR Team plans to undertake the 2023 training before proceeding with any knowledge sharing outside of their department. It is however recommended that the CR Team start planning, as soon as possible, training on relevant social matters for staff members from other selected departments, particularly those collaborating with CR Team on a regular basis (such as Human Resources, Procurement and Legal, and Mining). In line with IESC’s previous recommendations, the development of a programme for periodic, internally-led training and awareness-raising events targeting other departments is still required to align current practices with the requirements of the IFC Performance Standards. At the time of writing, the IESC does not have evidence of any meeting having been held between the HSECQ Director (supported by the CR Manager) and the directors of other departments to discuss a practical approach to implementing this programme and providing support.

## **5.2 Stakeholder engagement**

### **5.2.1 Updates on Stakeholder Engagement Plan**

At the time of the early March 2022 site visit, the first draft of the Stakeholder Engagement Plan (SEP) for the period 2022-2025 had been reviewed by the IESC and Policy Lenders and the document was in the process of being revised by CBG in line with the feedback received. A second round of comments were made by the IESC and the Policy Lenders in June 2022, based on a review of the revised 2022-2025 SEP (i.e. the second draft). At the time of the December 2022 site visit, the 2022-2025 SEP was yet to be finalised accordingly.

Reportedly, CBG has been working on the revising the second draft of the 2022-2025 SEP, with the majority of comments having already been addressed. At the time of the December 2022 site visit, the updated SEP was undergoing final validation before its official submission to the IESC and the Policy Lenders for review. It is understood that one of the main pending points under discussion within CBG is the best approach to adopt for disclosure of environmental monitoring results to affected communities. Once finalised, the redacted version of the 2022-2025 SEP will be uploaded to CBG’s website, replacing the 2019-2021 SEP which should be publicly available online until replaced.

At the moment the status of the SEP Action Plan shows a 17% delay as indicated by CBG’s documentation shared for review, with LRPs related activities being the most deferred (also refer to Section 9). From a more specific stakeholder engagement standpoint, delays are resulting in the following problems:

- Informing stakeholders about the visits of consultants in the context of North Cogon feasibility studies and socio-environmental impact assessment has not yet occurred despite a first field visit having been already carried out by the consultants;
- Quarterly feedback on monitoring results has not been provided to date which, as previously said, CBG plans to start after receiving validation of the 2022 -2025 SEP.

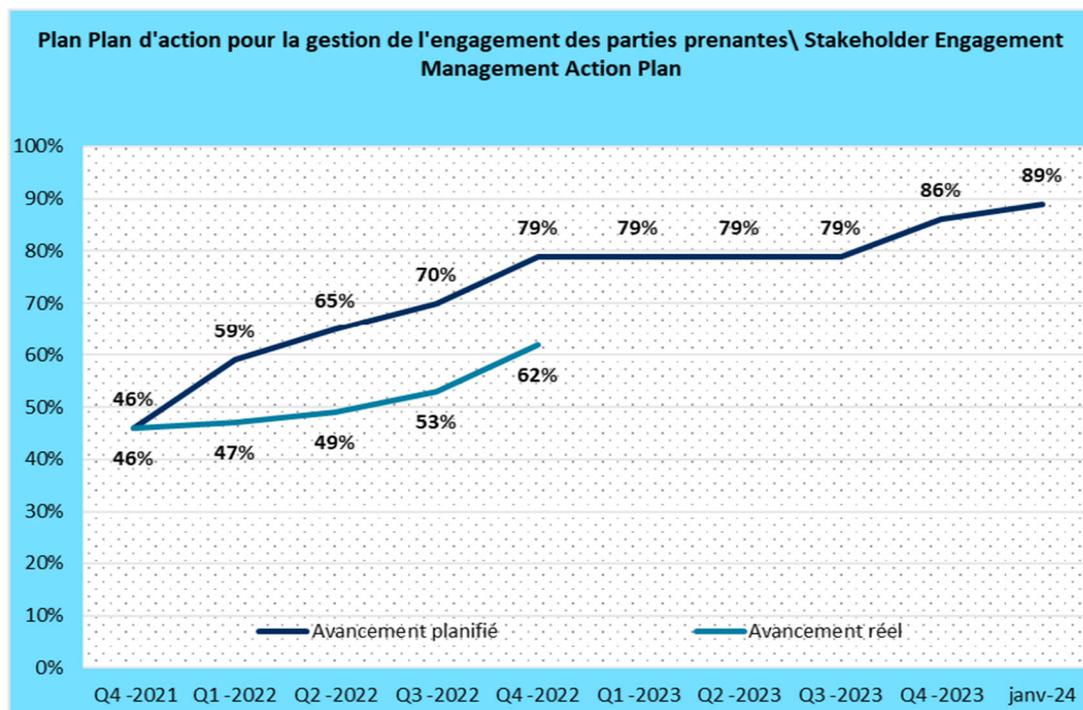
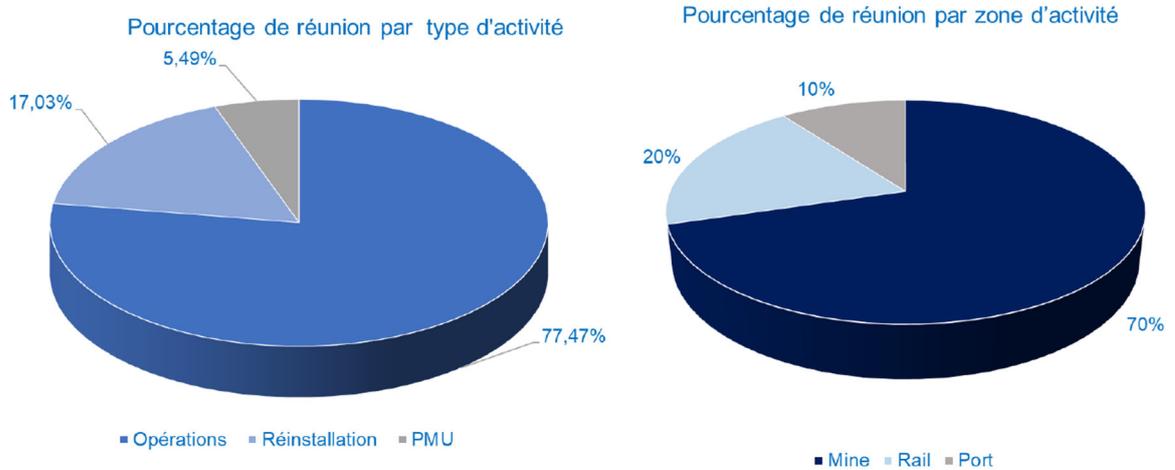


Figure 5-2: SEP Action Plan Status as of 30 November 2022

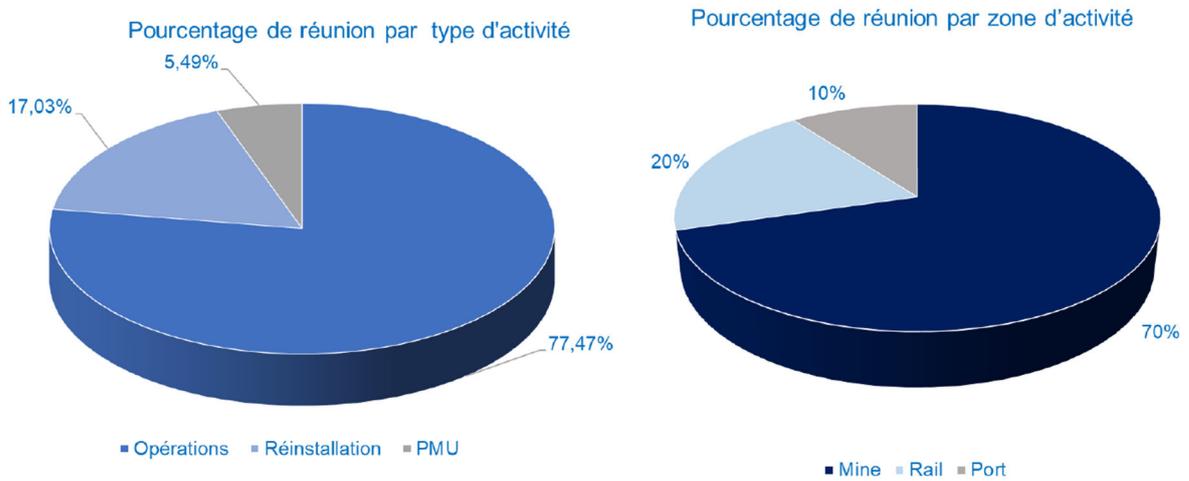
5.2.2 Implementation of the stakeholder actions for the year 2022

As previously reported, the IESC has been advised that a monthly follow-up, by a dedicated Champion, on the implementation of the Action Plan for the SEP is being undertaken. In addition, a quarterly follow-up will be carried out at the General Management level as part of the various action plans for compliance with the IFC Performance Standards (ESAP #1, Roadmap). During the December 2022 site visit, engagement activities were confirmed to occur regularly as per CBG’s Stakeholder Engagement Action Plan which, reportedly, is also updated weekly. The CR Team reported some changes to the Action Plan template used, which have been made following recommendations received from the sustainable development committee (*comité de développement*)

*durable*). At the time of the December 2022 site visit, the revised 2023 action plan was under finalization. This will be further verified during the next IESC site visit.



A summary of the main stakeholder engagement activities undertaken until November 2022 has been presented by the CR Team during the December 2022 site visit with information (%) on the areas and types of engagement activities undertaken shown in the Figure below. Specifically, CBG reports 364 meetings held with various stakeholders, in the context of the operations (282); in the context of resettlement (62); and in the context of multi-users (20) and with community meetings covering 83 villages around the mine (256 consultations), the railway (71 consultations) and the port (37 consultations).



**Figure 5-3: Meetings by zone and type of activity as of 15 November 2022**

In addition, shared updates of KPIs showed that 8 meetings have been held with national NGOs (CEFACAM, cabinet NEG, PRIDE GUINEE, AJDEF, CECOJE, CEFAD, AJDEF et API-Project), 1 meeting with an international NGO (Charente-Maritime Coopération) and 21 meetings with municipal and administrative authorities. Specifics of the topics discussed in such meetings have not been provided for review. However, the IESC understands from CBG’s presentations that “identification and consultations” with these NGOs have occurred at the rail and the port; and that recurrent concerns raised in all the meetings (including consultation with communities) are the following:

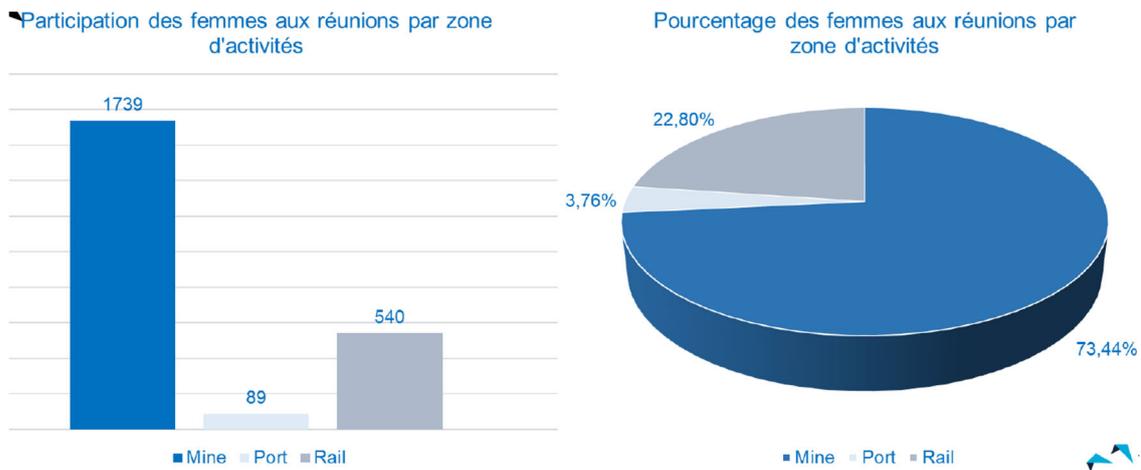
**Mine:** demand for basic social infrastructure, employment of local labour, improvement of access to drinking water (borehole), reprofiling of community access roads, resumption of PA-AGR (Projet d'Appui aux Activités Génératrices de Income Generating Activities), capacity building of young people.

**Rail:** improvement of access to drinking water (borehole), problem of crossing the rail (level crossing, pedestrian crossing, etc.), community access roads, demand for basic social infrastructure, employment of local labour.

**Port:** Demand for basic social infrastructure; community access road, access to drinking water, electricity problem.

Overall, engagement is regularly conducted by CBG. However, at the time of the site visit, engagements at the port were not undertaken due to a recent unavailability of pilots specialised in driving boats suitable to reach the areas of intervention. The IESC recommends that engagement activities at the port area be re-established as a matter of priority.

Since the beginning of 2022, CBG has also started conducting focus groups discussions (FGDs) with women and, separately, with youth since September 2022. Such FGDs are held straight after community consultations and therefore have the same frequency. The main purpose of FGDs is to allow women and youth to have a dedicated space to express their concerns on the same matters that are discussed during the community consultations. Based on the monitoring of pertinent KPIs, women accounted for 28% of the total participants involved in stakeholder engagement meetings at community level with details shown in the figure below. Youths accounted for 16% of all participants – though CBG considering the recent monitoring of their participation (i.e. September 2022) this data might not reflect reality as also observed by CBG.



**Figure 5-4: Women's participation rate in meetings (2022)**

Compared to the 2021 data reported in previous monitoring report, it is worthwhile noting an increased female participation rate at the mine (73% versus 23% in 2021<sup>8</sup>), a reduced participation at the railway (23% versus 42% in 2021) and at the port (4% versus 30% in 2021). CBG has also provided an analysis of such variations confirming the increase participation rate at the Mine where all meetings held had a significant presence of women; and at the rail which is considered relatively higher compared to 2021 due to the awareness-raising activities held in the context of rail safety, in schools and markets (also refer to Chapter 8 for more details on Community Health and Safety aspects, including specific engagements). In relation to the port CBG also confirmed the reduction in women's participation rate in community meetings due to the suspension of engagement activities as previously reported. All that being considered, the

<sup>8</sup> The increased female participation is also higher than in 2020 (32%).

IESC agrees with CBG's approach to enhance women participation particularly at the port and railroad levels by mean of:

- Intensifying women's focus groups in the meetings;
- Holding meetings with women's groups (IGAs, MSEs and associations);
- Increasing the frequency of meetings in the markets; and
- Considering the gender equality (men and women) in CBG's awareness-raising team composition to facilitate women's participation during community meetings.

CBG indicates that among the main concerns raised by the women participating in FGDs there are job opportunities and revenues and water issues. Among the youth, the main concerns raised are related to training and job opportunities. CBG has not undertaken any specific engagement with women to analyse issues related to GBV-SH. Given the sensitivities associated with GBV the CR Team would benefit from specific training on this subject. At the time that training on GBV-SH is organized for relevant CR personnel, engagement with women on this matter should occur via collaboration with a local, specialised NGO.

Since February 2022, CBG has started meetings with consultation forums (*cadre de concertation*) mainly including institutional stakeholders, Non-Governmental Organizations (NGOs), technical experts and communities "with a view to involving the various stakeholders in peacekeeping solutions between the neighbouring communities and the company", and share and discuss Project updates. To date, 6 consultations forums have been organized across CBG's operational sites; the IESC also understands that these open consultation forums – as organized by CBG - constitute a space for presenting CBG's activities and discussing complex issues, collecting and discussing participants' concerns. In addition, the IESC understand that such consultation forums have been positively welcomed by all participants, including local and administrative authorities, Civil society organisations (NGOs, women's and youth associations and others), and communities, with a general request to make such forum a permanent consultation channel.

To date, CBG has undertaken no engagement targeted specifically towards with People with Disabilities (PWDs) with, reportedly, one doléance concerning PWDs raised by an NGO during a meeting with the consultation forum which CBG has recorded in the appropriate register. A more dedicated engagement with PWDs is still required, with involvement of NGOs working in the field to ease identification and mapping of PWDs and to facilitate engagement.

From the meeting held at Fassaly Foutabhé during the December 2022 site visit (in which the IESC attended as an observer), some community members indicated the lack of follow-ups (*retour d'information*) in relation to environmental monitoring results, socio-economic surveys, and some minutes of meeting. In respect to the environmental monitoring results, during the December 2022 site visit, CBG expressed some reservations over sharing monitoring results which was mainly associated with the need to identify the best approach for their disclosure, in a non-technical manner, to communities. Such disclosure is nevertheless recommended as a matter of priority to ensure compliance with the IFC PS1. The IESC appreciates that in general follow-ups occur (the complaint was related to the lack of follow-ups for some (therefore not all) meetings and topics). However, while CBG prepare minutes of meetings for every consultation held, they are not shared/or signed off as evidence of recognition and acceptance of the topics discussed.

This was confirmed by the review of a sample of minutes of meetings in which only one minute of six minutes of meetings was signed.

## 5.3 Grievance Management

### 5.3.1 Updated Grievance Management Procedure

Similar to the 2022-2025 SEP, the Grievance Management Mechanism (GMM) Procedure, which is now a stand-alone document, was subject to two rounds of review in 2022. Amongst the main comments raised by the IESC and Policy Lenders during the second review of the GMM Procedure, the following are reported as most relevant:

- The need to ensure that key steps in the grievance process are included and described in the GMM Procedure, namely in terms of investigating grievances, identifying, proposing and agreeing on their resolution with complainants and implementing the agreed resolutions prior to their close-out.
- The need to update the flowchart describing the grievance process, once the process is updated in line with the above recommendation.
- The need to develop a monitoring and evaluation framework for tracking progress with respect to grievance management over time, incorporating the Key Performance Indicators (KPIs) detailed in the Procedure.

The GMM Procedure is yet to be finalised based on the second review of the document by the IESC and Policy Lenders.

### 5.3.2 Grievance Management Status

The new classification of grievances as reported in the GMM Procedure, divided in the following 4 categories and sub-categories has also been presented during the December 2022 site visit presented:

#### Resettlement and Land Occupation:

- Infrastructure
- Compensation
- LRP
- Survey/Inventory/Eligibility

#### Environment:

- Water Spills/Pollution
- Air Quality/Dust
- Noise/Vibration

#### Security:

- Blasting/Cracks
- Road Safety
- Railway Safety
- Marine Safety

#### Socio-economic (excluding resettlement):

- Water
- Electricity
- Employment
- Basic social infrastructure

Based on the comments already provided within the GMM procedure, the IESC recommends including additional (sub-)categories to better cover community health and safety (e.g. security arrangements); environment (e.g. soils / ground contamination, waste disposal), socio-economic (e.g. business / procurement opportunities) and resettlement/land occupation (e.g. use of land in unauthorised areas). CBG should also consider adding additional (sub-) categories to classify and monitor grievances related to biodiversity.

Based on CBG's documentation received for review, there are 2020 and 2021 grievances still open whose details can be found in the IESC's previous monitoring report. According to the grievance register as shared as part of the Borrower's Quarterly E&S Certificate (Q4-2022), 1 2021 grievance has been closed in the last quarter of 2022; however, no details are provided to determine which one. This will be further investigated in the next monitoring visit. In general, such prolonged delay has been observed by the IESC since October 2021 requiring CBG to

strengthen the capacity of the monthly HSECQ committee meeting to act swiftly to ensure that there are no institutional 'obstacles' to swift action in terms of: i) recognizing the legitimacy of the grievances; and then ii) putting in place the actions to close them as soon as possible. CBG's response as part of the 2022 action plan indicates that 2 team members are designated for the coordination/complaint management and that a specific KPI to monitor the timeframes to process complaints is foreseen within the 2022-2025 SEP. Based on the review of CBG's grievance register for review, and from the discussions held onsite, the IESC observes that the current version of the grievance register continues not to keep track of the time it takes to close each grievance and thereby fails to monitor deviation from the timeframe indicated in the grievance mechanism procedure (i.e. 50 days). The IESC also recommends that the grievance record also keep track of all grievances which are now managed through the CAO mediation so to have a clearer picture of how many open grievances are in fact under exclusive CBG's responsibility. In addition, due to the decision taken to make the Grievance Mechanism Procedure a stand-alone document and separated from the SEP, specific KPIs for the grievance management process are found in both documents.

The IESC recommends that CBG starts applying the above-mentioned indicators as a matter of priority. In addition, careful attention should be paid to use and analyse all indicators as included in the SEP and the GMM to obtain a unique picture of CBG's grievance effectiveness and functioning. As concerns the level of satisfaction of community residents targeted by the quantity and quality of mobilisation activities (through perception surveys) it is understood that a perception survey is planned with the support of IFC Advisory and should be available by Q1-2023.

Based on information provided by CBG for review in 2022 (precisely by 15 November 2022), 80 Community complaints have been logged, of which 28 been closed and 52 are being processed. Registration rate by category and sub-category of complaints are reported below

Safety: 11%

- Rail safety: 44,44%
- Road safety: 22,22%
- Blasting: 33,33%

Environment: 18%

- Quality (air/dust): 18%<sup>9</sup>

Resettlement/land use: 65%

- PRMS/LRP: 19,6 %.
- Compensation: 66,66%.
- Infrastructure: 13,72%.

Socio-economic: 6%

Based on additional information provided in the latest Borrower's quarterly E&S Certificate (Q4-2022), during the fourth quarter of 2022, CBG registered 32 grievances including 25 in the mine area, 01 in the port area and 06 in the rail area. 02 grievances out of the 32 grievances registered in the fourth quarter of 2022 have been closed.

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<sup>9</sup> Such data do not include percentage of the received grievances related to water issue. Based on the review of the grievance register, such type of grievances is classified under the category "Environment", sub-category "Pollution". Additional data provided by CBG in CBG's presentations, show that among the 52 open grievances recorded in 2022, 9 grievances are recorded under Environment, 8 of which being classified under the Pollution sub-category. The IESC understands that these 8 grievances refer to water issues.

Altogether, from January to December 2022, CBG registered 102 grievances altogether, 85 of which came from the mine area, 16 from the rail area and 01 from the port area.

The IESC notice that one grievance, recorded in June 2022, and submitted verbally by a citizen of Madina Carrefour related to the flooding of his house and the drainage of rainwater in his lowland due to CBG's works (ref. 220615\_IR\_Plainte citoyen Madina Carrefour inundation) was brought to court (though no date is included to better understand when this happened). The IESC will investigate this grievance further during the next monitoring visit.

CBG's analysis as reported in documentation shared for review informs that on environmental aspects, especially on the perceived water pollution, fewer complaints have been received although still relating to several villages (i.e. Fassaly Foutabhè, Fassaly Belendère). The high number of resettlement / land occupation related complaints appears to be mainly relate to concern over the delineation of stripping works.

CBG explains a reduction in blasting complaints due to the improved stemming process and to consideration of wind direction during blasting events. However, accidents involving stray animals remain a significant concern (also refer to Section 8).

From the discussion held during the December 2022 site visit and the documentation received for review, the IESC understands that community grievances and concerns are regularly collected by CBG and awareness raising on use of the mechanism is routinely organized as part of stakeholder engagement initiatives. In addition, CBG presents a structured analysis of grievance evolution throughout the years as evidence of an ongoing review.

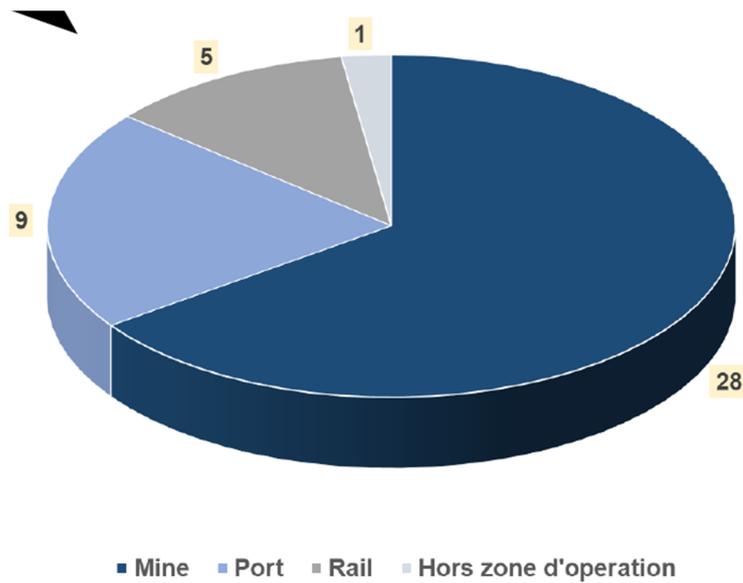
While CBG pointed out that all grievances are logged, discussions held during the December 2022 site visit indicated that a recent demonstration of women (date not reported) in Camp Balanta (Kamsar cité) for rotating power outage was not recorded in the grievance register. This reinforces the need to ensure that all grievances are recorded in the grievance register and that collection of grievances during stakeholder engagement activities become an explicit channel for receipt of grievance.

Finally, it is understood that possibility for anonymous grievances has not been clearly disclosed to communities and it should be ensured according to the GMM procedure.

### 5.3.3 Community Requests for Assistance (*Doléances*)

Available data indicate that 43 community requests for assistance were received out of which 13 were closed by 15 November 2022. In particular:

- 39% of the requests are related to financial and material support material support (purchase of furniture and equipment, financing of events).
- 33% of requests are related to basic social infrastructure (opening and maintenance of community roads and renovation of places of worship).
- 14% of requests are related to services (electricity, water, fire brigade and sanitation).
- 12% of requests are related to other (rail safety, PRAMS and safety, PRAMS and compensation).
- 2% of requests are related to environmental issues.



**Figure 5-5: Status of Community Requests for Assistance in 2022**

Updated data on Community requests in 2021 also indicates that 39 claims were registered with 32 closed.

Based on additional information provided in the latest Borrower’s quarterly E&S Certificate (Q4-2022), during the fourth quarter of 2022, CBG received additional community assistance requests from the mine area (12), five (05) community assistance requests from the rail area and two (02) from the port area. Nine (09) community assistance requests from 2022 have been closed in the fourth quarter of 2022 and two (02) requests from 2021 have been closed in the fourth quarter of 2022.

Overall, from January to December 2022, CBG received 49 community assistance requests, 35 of which came from the mine area, ten (16) from the rail and port areas.

Similar to the grievance register, the doléance register which has been shared for review as part of the Borrower’s quarterly E&S Certificate (Q4-2022) should be improved to better keep track of the time it takes to manage communities’ requests and to better inform about the doléance status by including more up-to-date details (in the e.g. “comment” or “execution date” columns) as some of the requests received in early 2022 are still under analysis or with completion dates to be determined or not applicable (NA) for reasons (refer to the doléances recorded on February 21, 2022, on March 8, 2022 and on March 9, 2022 as an example).

According to CBG’s documentation provided for review, in 2022 CBG has established a community request for assistance (doléances) management procedure which has been dissemination to communities through Focus groups. The IESC has not received such procedure yet, and therefore is not aware of its content.

**5.4 Environmental Compliance Certificate**

CBG previously reported a delay in the receipt of the renewed environmental compliance certificates for i) the Multi-User project and ii) the Phase 1 Expansion project. The former was due on 20 July 2022 and the latter 26 August 2022. CBG followed the process for renewal of certificates in a timely manner, but issue of certificates was delayed due to the change in government.

The IESC can now report that the Multi User Project Environmental Compliance Certificate<sup>10</sup> was issued by AGEE on 9th December 2022 and is valid until 30<sup>th</sup> November 2023. The Expansion Project certificate was not renewed because the Expansion Project is now complete following successful performance testing of Dryer 4 and is therefore the certificate is no longer required.

## 5.5 Integrated Management System - Road Map

The IESC has previously reported on CBG's progress towards meeting ESAP Item 1, which requires CBG to *align HSEC MS for existing operations with HSEC MS for the Expansion Project and bring current operations up to a level consistent with the intent of the IFC Performance Standards by January 2024*. A Road Map has been prepared that outlines a set of major milestones (based upon actions, timeframes, and interim deliverables) required to achieve the deadline of January 2024, and in many cases specifies clear deadlines for the completion of actions specified in existing E&S management plans (and Action Plans therein).

### 5.5.1 Status in December 2022

CBG continues to be supported by an external expert specialising in the implementation of an integrated management systems (IMS). Implementation of the Road Map is ongoing and appears to be maintaining momentum. Key activities/developments since the IESC previously provided a progress update are provided below.

- A Sharepoint document repository has been adopted by CBG - a notable development in ensuring document control and a single repository for documentation, thereby ensuring access and consistency of usage across all of CBG's functions.
- Completion of a matrix of roles assigning named Champions (responsible for delivering Actions Plans) and Sponsors (senior individuals accountable for the success of Actions Plans/reporting to Steering Committee and supporting Champions in the delivery of Actions Plans e.g. provision of resources), from various functions across CBGs operations.
- Ongoing monthly Road Map progress meetings by a steering committee. The status of Road Map implementation is also discussed during Quarterly management committee meetings. The purpose of the progress meetings is to track actual progress against forecast, identify delays/bottlenecks and agree on any interventions e.g. need for additional resources, as necessary to achieve the January 2024 deadline for completion of Action Plans.

The IESC has previously met with several Champions responsible for the implementation of Action Plans identified within the Road Map. Notably, during this site visit, Sponsors also participated alongside the Champions during meetings held with the IESC; during previous site visits the Sponsors did not participate/had not been appointed.

The status of implementation for certain Action Plans<sup>11</sup>, including plans that are behind schedule, is discussed further in subsequent chapters of this report. However, as a general observation, the Sponsors and Champions appeared to be fully engaged in the Road Map, with a clear understanding of their roles and responsibilities.

## 5.6 Environmental and Social Management Plans

CBG manages its environmental and social impacts through the implementation of a suite of E&S management plans. Many of these were prepared in late 2018/early 2019 with a 2-year review cycle envisaged. The IESC has highlighted the need to review and update certain environmental management plans in previous site visit reports<sup>12</sup>. Whereas CBG recognises the need to revise its management plans, it has delayed the review/update process preferring to tie any update to

<sup>10</sup> Certificate reference: 000087/MEDD/CAB/AGEE/2022

<sup>11</sup> See chapter 7 on Air Quality, Water Management, Noise and Vibration, Waste Management. This is a non-exhaustive list.

<sup>12</sup> For example, Waste Management and Dredge Management Plans

milestone events, such as completion of the Road Map (recognising the Road Map would likely inform any update of the management plans). The logic is understandable, however, the added delays resulting from the approach has resulted in several plans being out of date and content of the plans increasingly redundant. It is therefore recommended that CBG presents a schedule for the review and update of 'out of date' management plans to Policy Lenders/IESC, clearly stating any precursors or dependency on other events.

## 5.7 Procurement

The IESC has previously identified a protracted procurement process as a key reason for the slow implementation of actions in the management plans, for example, when ordering new equipment/commissioning specialist consultant/external service providers. The slow procurement process is thought to have broad consequences across CBG's operations and it was therefore the IESC's earlier recommendation that CBG undertake a detailed review of CBG's procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services.

As of December 2022 no specific action had been taken to address this recommendation.

## 5.8 Management of Change

The IESC has previously reported poor implementation of the CBG Management of Change (MoC) Procedure and a number of initiatives to disseminate and reinvigorate the MoC procedure. In the March 2022 site visit report, the IESC reported that a new MoC Coordinator had recently been appointed and the MoC Procedure had undergone a review by the HSECQ Department, resulting in a number of recommendations relating to the update of the MoC procedure, the appointment of MoC Champions, staff training and a further roll out of the Procedure.

During the latest (December 2022) site visit the IESC met with the MoC Coordinator (the Champion) and the Sponsor to discuss the current status of MoC. Significant progress had been made since March including the establishment of a MoC committee, drafting of a new MoC procedure, revised MoC register (on Sharepoint) and revision to MoC forms.

Work to improve use of the MoC procedure is ongoing, however the IESC is able to report significant progress has been made following the appointment of resource dedicated to the MoC roll out and implementation of the procedure.

Once finalised, the revised MoC procedure should be submitted to Policy Lenders/IESC for their review in accordance with agreements made between CBG and the financing parties. Further review of the procedures implementation will be required during the next IESC site visit to ensure the good progress noted during the site visit becomes embedded in CBG's day-to-day operational performance across all functions.

## 5.9 Dredging

A further dredging campaign was required in 2022 in line with a triannual maintenance schedule. Areas dredged included: CBG jetty berth; GAC jetty berth, the petit port, tug anchorage area, turning basin and access channel (17km). The dredging campaign resulted in the removal of almost 783,000 m<sup>3</sup> which was all deposited at the A3 disposal location<sup>13</sup> (the site of CBG's previous spoil disposal).

The IESC has received the Land Disturbance Permit (referred to as Dredge Permit) for the 2022 dredging campaign and has the following observations:

- Dredging was conducted from 26<sup>th</sup> June to 28<sup>th</sup> July 2022 (in line with the LDP and DMP)

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<sup>13</sup> The volume of dredged material is greater than in previous campaigns due to the curtailed dredging campaign in 2021 as a result of seasonal constraints applied by CBG as per the Dredge Management Plan.

- The A3 disposal site was specified in the LDP. This location has been used for several previous dredging campaigns, and therefore repeatedly disturbed/modified in the past.
- Marine mammals observers were specified in the LDP and present during the dredging.
- Reproduction periods for priority species were specified in the LDP and dredging scheduled to avoid these reproduction periods.
- The permit specifies the need for monitoring during dredging, including underwater noise monitoring.
- Underwater noise monitoring was conducted in accordance with the Dredge Permit
- Water samples were taken prior to start of dredging for laboratory calibration of field monitoring equipment and to establish a baseline. Subsequent monitoring during dredging confirmed turbidity exceed agreed limits of 25mg/l above baseline at survey point 2, however the current monitoring methodology does not allow for the determination of turbidity levels over a 6-hour period as per the criteria in the DMP. This undermines the value of the monitoring data/effectiveness of the mitigation measure (to halt dredging if the threshold criteria is exceeded). The IESC repeats its earlier recommendation that CBG should prioritise review its Dredge Management Plan/monitoring methodologies and/or amend its sampling methodology /equipment to ensure monitoring over the 6-hour period can be met.
- Communities were informed of planned dredging activities and associated risks and impacts.

A post Dredge Campaign Report is expected following each dredging campaign. At the time of writing the report was not available for review.

**Table 5-1: Status Update for Dredging-Related Findings identified in the March 2022 IESC Monitoring Report**

<b>Finding in March Monitoring Report</b>	<b>Status in December 2022</b>
<i>Environmental characterization of sediment from the dredging areas:</i>	A post dredging report has not been made available. Details of the 2022 dredging campaign, including characterisation of dredge materials, should be provided in the upcoming Annual Monitoring Report (AMR).
<i>Characterisation of the benthic fauna from the dredging area and disposal area prior to dredging:</i>  CBG undertook a marine survey team is currently on site working on a 1-year survey programme as part of CBG's wider biodiversity management programme.	The IESC has been unable to review the survey results. It is therefore recommended these are appended to the 2022 AMR.
<i>Underwater noise measurements:</i>  Noise monitoring was planned for the 2022 dredging campaign.	Details of any noise monitoring to be included in the Post Dredge campaign report/and/or the AMR.
<i>Review of Dredging Management Plan (DMP):</i>  The DMP was prepared in 2018 and requires review and revision to reflect any changes in CBG's approach to dredging. Any changes to the DMP need to follow the MoC Procedure and be subject to Lenders' approval. Review of the DMP was scheduled for September 2022.	The DMP has not been revised.

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

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
Dec 2022 _001	Organizational capacity and competence - staff resources	The permanent Resettlement Manager post remains to be filled. The Environmental Monitoring Team Leader is due to leave CBG at the end of Q1, 2023. It is unclear whether he will be replaced by an external hire/there is a succession plan in place.	CBG to continue in its efforts to recruit the Resettlement Manager and clarify its position with respect to the Environmental Monitoring Team Leader position. <i>Post site visit note: The IESC has been informed that CBG intends to appoint a new EMTL.</i>	<b>High</b>
Dec 2022 _002	Organizational capacity and competence - staff resources	The CR Team remains unchanged since the previous IESC site visit despite recruitment of new staff for the CR team is underway.	New personnel to be appointed as a matter of priority	<b>Moderate</b>
Dec 2022 _003	Organizational capacity and competence - staff resources	To minimise disruption to workloads whilst fulfilling training commitments, the CR Team plans the hiring of interim staff to provide coverage for absent members of the CR Team where they are undertaking training	CBG to careful timely planning of the temporary resources needed to support training is also required in view of the foreseen training schedule. Timeframe for such appointments to also include shadowing periods to ensure appropriate knowledge transfer.	<b>Low</b>
Dec 2022 _004	Organizational capacity and competence - equipment resourcing	IsoMetrix full implementation has further delays recorded compared to the last IESC site visit	Regular use of Isometrix to start as a matter of priority.	<b>Moderate</b>
Dec 2022 _005	Organizational capacity and competence - equipment resourcing	CBG has experience long delays CBG in purchasing and receiving the required equipment.	CBG to regularly plan new equipment in combination with the use of the Sponsor / Champion approach in case of delays. Planning should include conservative timelines that consider past procurement delays. Also Ref. Oct 2021_008	<b>Moderate</b>

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<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
Dec 2022 _006	Organizational capacity and competence - training	The 2023 Training Plan does not contain provisions for a dedicated training session on Gender Based Violence and Sexual Harassment (GBVSH)	Training on Gender Based violence and Sexual Harassment to be included and provided as part of CR team's 2023 training plan	<b>Moderate</b>
Dec 2022 _007	Organizational capacity and competence - training	Current version of the 2023 Training Plan targets the social team only (i.e. CR and resettlement); no training on social matters is planned at present for colleagues from other departments.	Development of a programme for periodic, internally-led training and awareness-raising events targeting other departments is still required to align current practices with the requirements of the IFC Performance Standards (an ESAP requirement).	<b>Low</b>
Dec 2022 _008	Stakeholder Engagement	The 2022-2025 SEP is yet to be finalized and disclosed.	CBG to ensure that the SEP is finalized and disclosed as a matter of urgency. In the interim, the previous version of the SEP should remain publicly available on CBG's website.	<b>Moderate</b>
Dec 2022 _009	Stakeholder Engagement	Engagements at the port are currently on hold due to recent unavailability of pilots specialised in driving boats suitable to reach the areas of intervention.	CBG to re-establish engagement activities at the port area as a matter of priority.	<b>Moderate</b>
Dec 2022 _010	Stakeholder Engagement	At the moment no specific engagement with women to analyse issues related to GBV-SH have been undertaken.	In the time that training on GBV-SH is organized for relevant CR personnel, engagement with women on GBV-SH should occur via collaboration with a local, specialised NGO – in line with CBG's intention.	<b>Moderate</b>
Dec 2022 _011	Stakeholder Engagement	As of today, CBG has undertaken no specific engagement with People with Disabilities (PWDs)	A more dedicated engagement with PWDs is required, also through involvement of NGOs working in the field.	<b>High</b>
Dec 2022 _012	Stakeholder Engagement	Consultation follow-ups occur though not systematically. Minutes of meetings for every consultation are not shared with communities and signed off as evidence of recognition and acceptance of the topics discussed	Ensure that minutes of the consultations undertaken to be shared with communities and signed off.	<b>Moderate</b>
Dec 2022 _013	Stakeholder Engagement	While disclosure of environmental monitoring methodology occurs, CBG has not started disclosing environmental monitoring results to communities.	Disclosure of Environmental monitoring results to be organized as a priority.	<b>High</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
Dec 2022 _014	Community Grievance Mechanism	The GMM procedure should include additional (sub-) categories to better cover community health and safety (e.g. security arrangements); environment (e.g. soils / ground contamination, waste disposal), socio-economic (e.g. business / procurement opportunities) and resettlement/land occupation (e.g. use of land in unauthorised areas). CBG should also consider adding additional (sub-)categories to classify and monitor grievances related to biodiversity.	GMM Procedure revised and finalised based on the second review of the document by the IESC and Policy Lenders.	<b>Moderate</b>
Dec 2022 _015	Community Grievance Mechanism	2020 and 2021 grievances are still open.	CBG to strengthen the capacity of the monthly HSECQ committee meeting to act swiftly to ensure that there are no institutional 'obstacles' to swift action in terms of: i) recognizing the legitimacy of the grievances; and then ii) putting in place the actions to close them as soon as possible	<b>High</b>
Dec 2022 _016	Community Grievance Mechanism	Current version of the grievance register does not keep track of how much time it takes to close grievance so to monitor deviation from the timeframe proposed in the grievance mechanism procedure (50 days).  The grievance register should also keep track of all grievances which are now managed through the CAO mediation.	CBG to start using updated KPI as part of the grievance register to collect data on the timeframe "for closing grievances by type (source, level, nature)".  The Grievance register to keep track pf grievances under CAO mediation.	<b>Moderate</b>
Dec 2022 _017	Community Grievance Mechanism	Grievance management related KPIs can be found in the updated (yet to be finalized) SEP and in the GMM procedure	CBG to ensure that all grievance management related KPIs are applied and monitored	<b>Low</b>
Dec 2022 _018	Community Grievance Mechanism	A recent demonstration of women in Camp Balanta (Kamsar cité) for rotating power outage was not recorded in the grievance register	All grievances to be recorded in the grievance register. Also Ref. Oct 2021_033, Appendix 3	<b>Moderate</b>
Dec 2022 _019	Community Grievance Mechanism	Possibility for anonymous grievances has not been clearly disclosed to communities and it should be ensured according to the GMM procedure.	Disclosure possibility for anonymous grievances. Also refer to the IFC Good Practice Note "Addressing Grievances from Project Affected Communities".	<b>Moderate</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
Dec 2022 _020	Community Grievance Mechanism - Dolèances	The dolèance register should be improved to better keep track of the time it takes to manage communities' requests and to better inform about the dolèance status.	Updated Dolèance register	<b>Low</b>
Dec 2022 _021	Environmental Management Plans	Certain Environmental Management Plans have not been updated since January 2019, in part because updates were being linked to outcomes from the implementation of the Road Map/development of the integrated Management System.  This finding has been made before and is repeated to emphasize an increasing urgency to update the EMPs.	Undertake a structured review of current EMPs and update accordingly, keeping the IESC/Lenders informed in accordance with the MoC procedure	<b>High</b>
Dec 2022 _022	2022 dredging campaign	Dredging of port, turning circles and approach channel was completed outside of sensitive periods for marine fauna in accordance with the Dredge Management Plan and a Dredging Permit. However, the IESC is unable to confirm whether certain requirements of the permit/DMP were executed, including characterisation of sediment quality and benthos prior to dredging	Future dredging campaigns should comply in full with the relevant requirements of the DMP as transposed into Dredging Permits.	<b>Moderate</b>

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

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

### **6.1 Introduction**

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

- Identification of OHS risks and impacts;
- OHS Management System;
- Organizational capacity and competency;
- Leadership, Commitment and Accountability;
- Monitoring and review.

At the next visit, it will be necessary to focus on the labour situation (including a review of workers' grievances, contractors' labour management and management of inspections/audits). Indeed, contractors' grievances are included in the CMP (Contractor Management Plan), which is managed by a dedicated committee and whose implementation was being finalised at the time of the December visit.

Key findings are presented on each of these topics below.

### **6.2 General Limitations**

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

### **6.3 Identification of risks and impacts**

During the December site visit to the Kamsar plant (including contractor's worksite), railway and active mine (including workshops), the IESC observed numerous of safety related positive elements and numerous findings. These observations are detailed bellow.

### 6.3.1 Kamsar plant

The hazardous waste area is currently unsuitable for the storage of hazardous wastes. CBG is aware and has plans to redevelop the site. However, findings requiring immediate attention were observed:

- First aid kits (eye wash and emergency shower systems) and fire emergency equipment are not available near the area;
- Outside the hazardous waste area: the product stored in the container ("Nalco") is not clearly identified (no label on the door outside the container).



**Figure 6-1 Container near the hazardous waste area**

The waste storage workplace (Tora Bora) is much improved since the last visit following implementation of a number of actions to address earlier findings, for example: the office has been commissioned and safety documents are display on the wall.

In December, the incinerator was shut down, so the inspection was restricted. However, findings from March 2022 visit were again observed:

- The 1200 litre fuel storage tank remained to be located between the two incinerator containers where it is was considered by the IESC to be potentially unsafe. However, CBG has confirmed that the location of the fuel container is aligned with the manufacturer's recommended location rules. The manufacturer's site layout will be reviewed in the next site visit.
- No HSE documents are available in the work areas (e.g. Take5 assessments);
- The HSE team and Manager of the area performs inspections but doesn't formally record these if there are no observations/findings.

Elsewhere on the Kamsar plant, the contractor Soguidev was mandated by CBG to level the ground in an area, to manufacture and install paving stones and rainwater culverts. During the worksite visit, the IESC observed the correct use of the Take5 document, the holding of the "Toolbox meeting" in the morning, the location of the assembly point, the location of the closed box for anonymous reporting of grievances/doléance on worksite (managed by the committee in charge of the Contractor Management Plan). Contractor personnel interviewed were wearing the correct PPE and were able to articulate CBG's HSEC policy and at least one of Golden Safety rules.

However, a number of concerns and areas for improvement in terms of safety on contractor worksite were identified as follows:

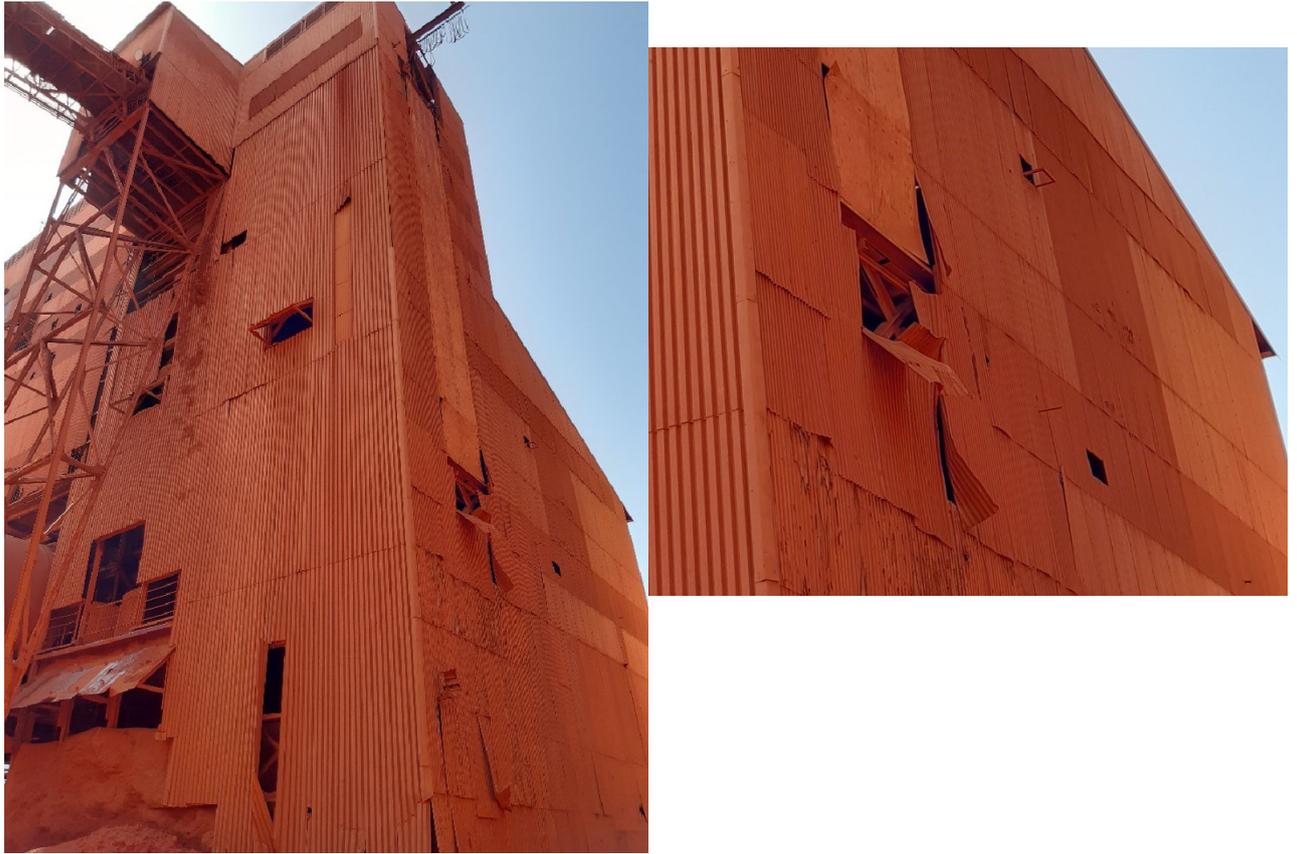
- Contractor personnel on site were not aware of CBG safety procedures. They don't use CBG's procedures to complete the Permit to Work or the Job Safety Analysis;
- The manager of contractor performs inspections of the worksite but doesn't formalise these if there are no observations/findings;
- Contractor personnel interviewed didn't have their personal badge, so they didn't carry the emergency contact numbers;
- Prior the walk over of the worksite, the IESC didn't sign an attendance register or receive a safety induction.

#### *Asset integrity/falling objects*

During the work over inspection, the risk of falling objects were observed as follows:

- 1) Some of the assets are in need of repair. Of note, corrugated sheeting used as cladding on the transfer towers is loose and/or damaged in places (Figure below 6-2) presenting a risk of falling objects from height to workers operating in the area beneath.
- 2) Accumulations of bauxite dust were observed on several angled panels (Figure 6-3). In the event the dust falls as a consolidated mass there is a risk to workers below.

It is therefore recommended that CBG inspects its assets to identify risks from falling objects (especially from height). Damaged or loose panels at risk of falling should be repaired with access to areas below any high-risk areas cordoned off in the interim.



**Figure 6-2. Damaged panels on transfer tower at risk of falling (close up of damaged panels to the right)**



**Figure 6-3. Accumulations of dust above a working area**

### *Other observations*

A ladder welded in place was used to access the roof of the air quality monitoring station in Kamsar (Appendix 2, Photo 13). The ladder had no evidence it was tested and is considered unsuitable as a permanent means to access the air quality monitoring equipment on the roof. The risk to users (in the event of a fall) is increased because the ladder is at the back of the building and out of sight. Materials, assumed to be waste, at the foot of the ladder should be removed.

In addition to this ladder, CBG should identify all means of access to heights at its facilities, assess the risks and working practices. If used on a frequent basis, consideration should be given to alternative stepped access to the roof.

### 6.3.2 Active Mine

At the mine haul roads, the IESC observed the compliance of trucks with speed limits<sup>14</sup>, the improvement of road signs on the mine haul roads and the development of community road sections.

- There are no road signs or guard on the community road sections: consequently, community members still choose to use the mine haul roads;
- The guard interviewed hadn't done a Take5 assessment, was unable to articulate CBG's HSEC policy and Golden Safety rules. At his workplace, there was no light and no restroom (and the guard was instructed calls his manager for transportation to a toilet, however in reality he chose to go into the bush).

At the mine control centre (PCC), since before 2021, each truck is equipped with Global Positioning System (GPS) devices with real-time tracking from control screens at the mine control centre (PCC). Since March 2022, a test phase of facial recognition devices for fatigue, telephone usage and smoking whilst driving is in progress with a warning system in the truck cab.

- The employee in charge of the PCC had no feedback on the effectiveness of this system;
- There is no formal control of drivers' schedules and break times between shifts.

The alcohol policy is strictly and seriously enforced: regular testing campaigns and management of positive people. Any individual that tests positive is isolated (no work) and supported by a doctor in cases of an alcohol dependency.

At the Caterpillar (heavy vehicles) and CBG (light vehicles) workshops, the IESC found that the colour control process for lifting equipment is up to date. The employee in charge of the equipment storage area gives compliant and controlled equipment with the correct colour code (one colour per month of validity). However, the following observations were made:

- A controller module, of a lifting device, with its damaged power supply cables was still in use;
- A fire hose cabinet out of order for a long time
- An extinguisher without periodic inspection date and without safety pin.

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<sup>14</sup> One except relates to haul trucks on the Thiapikhoure Road at the river valley crossing where at least one driver appeared to be gaining momentum on the downhill slope ahead of an uphill slope.



**Figure 6-4 Damaged controller module of a lifting device / fire hose cabinet out of order / extinguisher without safety pin**

### 6.3.3 Railway

A new system (onboard signalisation and switch automation) is being implemented. When this system is working, the PCC will manage all from the control centre room. Currently, switchmen (aiguilleurs) are needed. Switchmen can communicate with PCC by radio and flagmen (hommes piquets) position along the railway line to improve community safety, can communicate by mobile phone. In addition to this process, a car (with alarm and flashing light) follows the train throughout its journey to announce its arrival. The car travels on the road parallel to the railway. Flagmen and switchmen interviewed (Sotrac Plus contractor) has participated in a Take5 assessment the morning at the office and they were familiar with CBG's HSEC policy and Golden Safety rules. However,

- No HSE documents are available in the work areas (e.g. Take5 assessments);
- Flagmen don't have radio (they have a mobile phone), they can't talk to each other. Switchmen can't easily communicate with flagmen in case of emergency. There is no general and rapid alarm system to inform all the people involved at the same time.

## 6.4 OHS system

### 6.4.1 Integrated Management System

In 2022, CBG started the centralisation of all its systems into one Integrated Management System (SMI: Système de Management Intégré). In order to improve document management and to control access and use, this Integrated Management System is being deployed on Sharepoint.

This initiative will be an improvement for the safety management because at present the organisation of the safety management system is complex.

- As a consequence of the current complex organisation, the IESC identified gaps in the tracking of the numerous action plans (overdue actions), management plans (finding with difficulties) and H&S registers.

## 6.4.2 Documentation process

To improve the use of Take5 assessment, CBG has ordered Take5 assessment booklets for all employees and its contractors. Sharepoint, as a single repository for documents, will be also help improve the H&S documentation process (e.g. template versions, archiving and tracking).

During the site visit, the IESC observed a number of areas needing improvement:

- H&S documentation is not on site because it is already archived by the supervisor or the H&S team in their own locations. This process doesn't allow for managing change on site by updating documentation;
- Take5 assessment and Job Safety Analysis are poorly completed on site by operational staff (maybe because documents are archived too quickly or because workers are not aware of CBG safety procedures);
- The Job Safety Analysis template doesn't include lifting as an operation that require a work permit;
- The CBG excavation permit template doesn't list the required documents to draft the permit (e.g. Job Safety Analysis).

### *Contractor Management Plan*

The current Contractor Management Plan (CMP) process poorly centralizes and manages KPIs from contractors.

CBG is in the process of deploying a new contractor management plan with the setting up a committee involving the H&S, HR, procurement and legal departments. The new CMP will include the WBG EHS Guidelines and an appropriate pre-qualification process for each category of contractor. According to this committee, the new CMP has already been tested with "pilot" contractors and the results are encouraging. The committee will assign a CBG manager per contractor.

The committee's action plan (started in October 2021) indicates that 33% of the CMP's actions have been completed. The year 2023 is expected to complete the action plan and this will be an issue for IESC prioritization in future site visits.

## **6.5 Organizational capacity and competency**

### 6.5.1 OHS organization

CBG has recently established a new H&S organization notably to improve actions regarding maintenance and asset management. The new organization includes the involvement of new actors (called Sponsor/Champion/Officer) to follow and manage H&S actions from inspections and audits. In addition, the CBG has assigned a responsible H&S officer per operational division to have a dedicated H&S support. This operational division H&S Officer reports to the Superintendent of the division. CBG is intends to recruit a further 3 H&S advisors to complete the team.

Despite this recent reorganization, several findings have been highlighted by the IESC (detailed in this report). There are still gaps in the monitoring of actions, probably also due to the complexity of the tools/tables that form the current system.

### *OHS Training*

As previously identified in March 2022, there is still no system for tracking out-of-date certifications and training courses and the tool used to monitor training is basic, being based on a simple Excel table.

The IsoMetrix database will be configured for safety aspects management including a specific training component. See also commentary about IsoMetrix in Section 5.1.4.

CBG decided to include contractors in its own training management plan. In this context, contractors and CBG personnel are currently being trained by external trainers: safety culture and safety leadership (Dupond's "dss+" programme) and CACES (Certificates of Aptitude for the Operation of Safety Equipment).

#### 6.5.2 Leadership, Commitment and Accountability

The involvement of CBG's management is effective, notably with the 2 steering committee meetings per month and the new roles of the sponsors. A second important meeting regarding the management's commitment to H&S is the "Maintenance Operations Review Meeting" (also twice a month). This meeting is attended by the senior managers of the relevant divisions. These meetings demonstrate the involvement of the operational managers (management of action plans and monitoring of the progress of actions). In addition, in 2022, senior managers comply with their audit/inspection commitments and a H&S award for all staff system was implemented by CBG.

Overall, between the March and December 2022 visits, the IESC also confirmed the improvement of the Safety Culture on the ground (e.g. PPE and Safety golden rules) and on the top. Indeed, the most numerous findings concern mainly local supervisors and team leaders (not enough formalised inspections, no H&S documentation on site).

### 6.6 Monitoring and review

#### 6.6.1 Incident Investigations and Root Cause Analysis

CBG has implemented the Incident Cause Analysis Method (ICAM) System for the investigation of work-related incidents. However, as noted during the March visit, a review of last Root Cause Analyses (concerning unsafe acts and unsafe conditions with a high severity potential) by the HSEC team indicated that the analyses tended to focus in individual and did not capture organisational root cause. Consequently, corrective actions tend to be localized, focusing on personnel on the ground rather being applied more widely across CBG's operations.

Only actions from cause analyses are managed by the HS team (actions from inspections are managed by the operational teams with the support of a HS officer; see previous chapters). Despite this, there are many action plans and a large number of actions to be monitored, so it is very difficult to keep the action plans up to date and, above all, to close the actions. However, a large number of actions are closed.

Considering the lack of a structured OHS Assurance system visible notably by the large number of actions, it would be important to prioritize those actions arising from fatalities. Indeed, not all actions related to the 2021 fatalities are yet closed (see findings regarding working condition of security guards). These situations should alert those responsible for the HS system.

- In order to manage them more efficiently, fatalities should be presented separately in the reporting tables and in the committee reports with the top management, so that targets and actions are also presented separately.

#### 6.6.2 OHS Performance

The annual HS programme was developed with senior management at the beginning of the year: 6 HS priority axis were defined.

- These 6 priorities are not visible in the system or the tools or the meeting report with the senior management. Thus, is not clear how the 6 axis are reflected in systems and tools and how progress against each axis is assessed.

KPIs with percentage of completion exist but they do not appear to clearly align with 6 priorities. KPIs are quantitative or without target; leading indicators need better KPIs.

- Define the KPIs of each division according to the 6 priority axes;
- Develop uniform dashboards for the different monitoring levels (champions, sponsors, divisions, departments, etc.);
- Each KPIs of each division should be the same structure with proportionate targets (including best practice and leading indicator) such that performance across all of CBG's operations ca be more readily monitored.

**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>
Dec 2022 _023	Risks and impacts	Numerous findings from waste management (hazardous area and storage workplace)	All	<ul style="list-style-type: none"> <li>• The hazardous waste area: <ul style="list-style-type: none"> <li>○ Add first aid kits (eye wash and emergency shower systems) and fire emergency equipment near the area.</li> <li>○ Clearly identified with labels all products stored in (and near) the area.</li> </ul> </li> <li>• The waste storage workplace: <ul style="list-style-type: none"> <li>○ Checked if fuel storage tank complies with the manufacturer's recommended location rules.</li> <li>○ Keep HSE documents in the work areas (e.g. Take5 assessments).</li> </ul> </li> <li>• Formalise all inspections regardless of whether there are observations/findings.</li> </ul>	<b>Moderate</b>
Dec 2022 _024	Asset integrity/falling objects	Corrugated sheeting used as cladding for the transfer towers is loose and/or damaged presenting a risk to workers operating below. Also, accumulations of bauxite dust were observed on several angled panels presenting to a risk to workers below in the event the dust falls as a consolidated mass	Operations	CBG should inspect its assets to identify risks from falling objects. Damaged or loose panels at risk of falling should be repaired with access to areas below any high-risk areas cordoned off in the interim	<b>Moderate</b>
Dec 2022 _025	OHS system	Lack of follow-up to the multiple action plan(s) may result in the reoccurrence of similar serious events (fatalities, fatigue and maintenance management)	All	<ul style="list-style-type: none"> <li>• Mine haul roads: <ul style="list-style-type: none"> <li>○ Include the road sections intended for communities in the traffic management plan (manage road signs and guard to discourage continued use of haul roads).</li> <li>○ Improve the working conditions of guards and control the application of CBG rules by contractors.</li> </ul> </li> <li>• Mine control centre (PCC):</li> </ul>	<b>Moderate</b> (Moderate in isolation and <b>High</b> collectively)

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				<ul style="list-style-type: none"> <li>○ Decide on the effectiveness of the facial recognition devices for deployment to all vehicles or to investigate an alternative device.</li> <li>○ Considering a way to control of drivers' schedules and break times between shifts.</li> <li>• Mine workshops:                             <ul style="list-style-type: none"> <li>○ Perform more inspections on site and provide on site procedures and instructions relating to damaged equipment. Identify damaged equipment and isolate it immediately (controller module of a lifting device, extinguisher, fire hose cabinet).</li> </ul> </li> <li>• Railway:                             <ul style="list-style-type: none"> <li>○ Keep HSE documents in the work areas (e.g. Take5 assessments).</li> <li>○ Considering a way to simultaneously alert and inform multiple parties (hommes piquets) along the railway line involved at the same time.</li> </ul> </li> <li>• Integrated Management System:                             <ul style="list-style-type: none"> <li>○ Continue and increase the deployment of the system on Sharepoint (simplify action plans).</li> </ul> </li> </ul>	
Dec 2022 _026	OHS System	Clarify the HS documentation process to avoid errors or misunderstandings in the workplace	All	<ul style="list-style-type: none"> <li>• Clarify the process for archiving HSE documents.</li> <li>• Clarify the procedure for the management of change (and revision of safety documentation) on site.</li> <li>• Share and provide with contractors and employees the site safety procedures of CBG.</li> <li>• Include lifting operations as operations requiring a work permit in the Job Safety Analysis template.</li> <li>• Add the required documents to the CBG excavation permits.</li> </ul>	<b>Moderate</b>

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
Dec 2022 _027	Contractor Management Plan	New Contractor Management Plan is ongoing with involvement of HR, legal and procurement departments	All	<ul style="list-style-type: none"> <li>Continue and accelerate the implementation of the CMP.</li> </ul>	<b>Moderate</b> (See action "March 2022_012" in appendix 3)
Dec 2022 _028	Organizational capacity and competency	OHS organisation	All	<ul style="list-style-type: none"> <li>Simplify tools and tables to complete for HS reporting to provide clear KPIs.</li> <li>Review KPIs to comply with the action plan and priorities.</li> <li>Review the reporting and monitoring tools so that they serve as communication tools.</li> </ul>	<b>Moderate</b>
Dec 2022 _029	Leadership, Commitment and Accountability	Maintain the involvement of senior management, continue to increase the safety culture at all levels of personnel and strengthen the involvement of team leaders.	All	<ul style="list-style-type: none"> <li>Formalise and simplify the inspections or visit required of Team Leaders.</li> <li>Support team leaders to perform more inspections on site.</li> </ul>	<b>Moderate</b>
Dec 2022 _030	Monitoring and review	The lack of responsiveness in managing fatality related actions should be a warning to those responsible for the HS system or Senior management.	All	<ul style="list-style-type: none"> <li>In order to manage them more efficiently, fatalities related actions should be presented separately in the reporting tables and in the committee reports with the senior management, so that targets and actions are also presented separately.</li> </ul>	<b>High</b>

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

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

### 7.1 Implementation of Environmental Management Plans

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

### 7.2 Environmental Monitoring

The March 2022 IESC Monitoring Report highlighted the following areas of progress:

- Agreements with accredited external laboratories for complex analyse of environmental samples:
- Dispatch of samples for analysis and some early results.
- Contract in place with a regional supplier for repair and maintenance of equipment at the static air quality monitoring station in Kamsar and meteorological stations at Kamsar and Sangarédi. The air quality monitoring station was not functional at the time.
- Receipt of accessories to new noise and vibration meters, with arrival of a new seismometer pending.

As of December 2022, the status is as follows:

- Contracts with laboratories remain in place and analysis of environmental samples is ongoing.
- The air quality monitoring station in Kamsar is functioning
- As reported above, the server needed to improve operability of IsoMetrix is now in place (use of IsoMetrix for environmental monitoring results imminent)
- Two new seismometers have been procured and are in use.

#### 7.2.1 Environmental Monitoring Programme

CBG has been working to the 2019 Environmental Monitoring Programme (EMoP), although not in full due to problems with analysis of samples. During the site visit, the IESC was presented with a revised EMoP matrix. The matrix has a different format to the EMoP and is therefore difficult for the IESC to undertake a detailed comparison of the two, however CBG has informed that the number of samples/parameters analysed remains as agreed in the Lender approved EMoP, other than: i) enforced changes associated with the drying up of streams (where water samples cannot be taken); the collection of additional samples from new locations as CBG's operations have moved to new areas; and iii) changes that reflect agreed amendments to other environmental management plans, e.g. the NVMP.

The IESC supports an adaptive approach to environmental monitoring which can be adjusted over time to meet the Project's needs, recognising that changes are allowed for in the EMoP and other management plans in accordance with the Management of Change Procedure.

The IESC confirms the EMoP matrix has been shared with Policy Lenders and anticipates an update of the EMoP, made available for review by the IESC, will follow.

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

The IESC previously expressed its view that CBG's environmental monitoring team was under resourced, particularly recognising an anticipated increase in workload as sample collection and analyses ramped up following agreement with external laboratories. During the December 2022

site visit, CBG informed that an additional 5 posts had been filled in the team, representing a significant increase in the teams resourcing level.

### 7.2.3 Disclosure of Monitoring Results

The IESC has previously reported CBG's commitment within its management plans to disclose the results of its environmental monitoring to affected communities and that a protocol for disclosure of environmental monitoring results was scheduled for finalisation in June 2022. As of December 2022 there was no evidence of environmental monitoring results (with the exception of noise and vibration data for villages located in proximity of blasting/mine works) being routinely disclosed, and the earlier IESC finding remain open (see Appendix 3, Oct 2021\_018).

## 7.3 Air Quality

CBG developed an Air Quality Management Plan (AQMP) in early 2019 which included an action plan (a list of management actions). The AQMP and original action plan have been supplemented with a Corrective Action Plan that was developed to close out ESAP#13 concerning the development of bespoke stack emission limits for the Project. A status update against the actions plans/key actions therein is provided below.

### 7.3.1 Status of AQMP Implementation.

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

The Figure is an update to the one presented in the March 2022 IESC monitoring report and shows actual progress (orange line) is well behind planned progress. It is further noted that the planned progress schedule differs from the schedule previously presented indicating the planned schedule has been revised. The re-forecast indicates completion of all actions by January 2024, although there is no longer any contingency in the schedule.

The metrics used in the graph are a crude measure of progress (actions completed) and there is a good chance the gap between planned and actual completion will narrow as actions that are in-progress reach completion, however, the current gap is significant and indicating strong likelihood that some actions will be ongoing after January 2024.

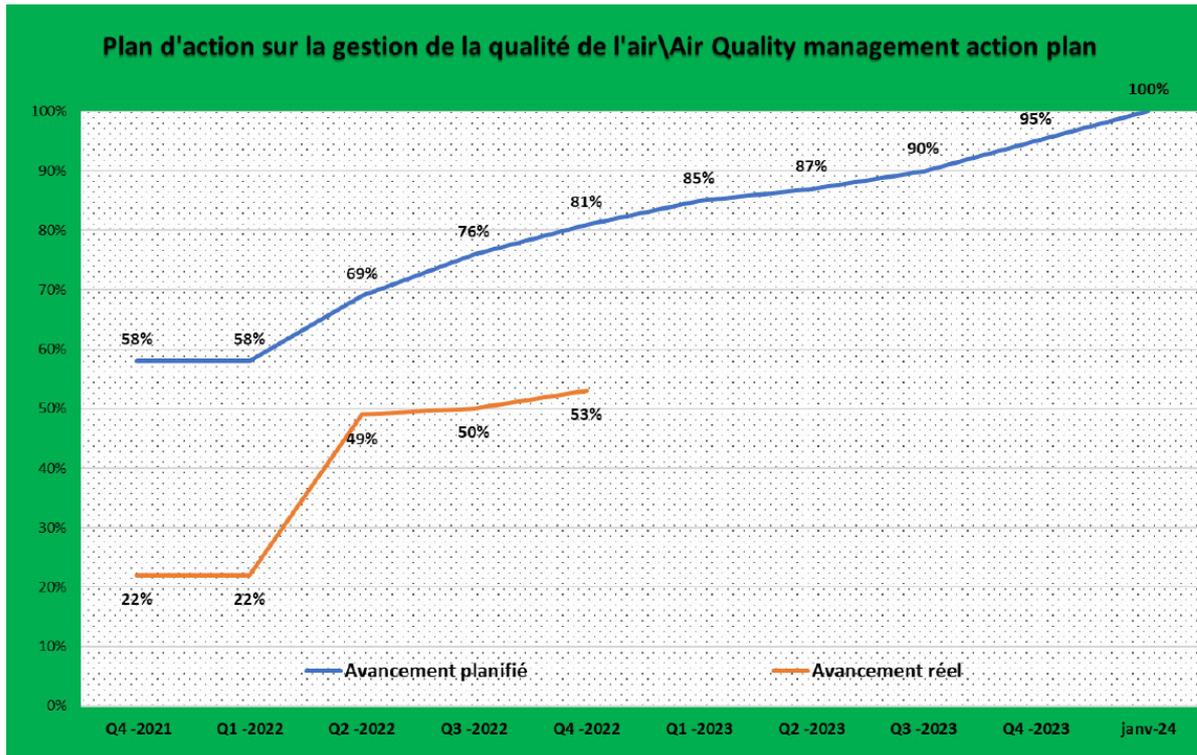


Figure 7-1. Status of AQMP implementation

In preceding Monitoring Reports, the IESC reported on: i) Stack emission monitoring and finalisation of the AQMP; ii) ambient air quality monitoring; and iii) dust suppression. These remain key issues are revisited in this report with status updates below.

7.3.2 Stack Emissions Testing and update of the AQMP

The Air Quality Management Plan (AQMP) prepared in January 2019 did not specify stack emission criteria for the dryer stacks in Kamsar. An agreement was made between CBG and Policy Lenders to revise the AQMP based on stack emission limits that were to be derived and then agreed with the Policy Lenders, noting that EHS General and Industry Sector Guidelines do not provide in-stack emissions limits that can be applied readily to bauxite dryers (ESAP Item 13, Appendix 4). See earlier IESC monitoring reports for further details on the approach to determining stack emission levels.

The IESC has previously reported on the difficulties<sup>15</sup> faced by CBG in determining stack emission criteria, including collection of empirical stack emissions data needed to inform dispersion modelling and thereby stack emission limits. Wet season stack emission monitoring was successfully undertaken in Q3 2022<sup>16</sup>, complementing the earlier dry season monitoring data and providing input data, under different seasons/operating conditions, required by the dispersion model/to determine stack emission limits.

In recognition of the delays indicated above, since March 2022, CBG has also agreed a timebound AQ Corrective Action Plan (AQ CAP) with lenders, which takes a more holistic approach to improving air quality. Thus, in addition to agreement on stack emission and any interventions needed to achieve agreed limits, the approach detailed in the AQ CAP includes:

- Inspection and refurbishment of dryer combustion chambers;

<sup>15</sup> Difficulties included COVID travel restrictions and in-country security risks – see previous IESC monitoring reports for further details.

<sup>16</sup> Wet season sampling campaign report was in preparation and unavailable at the time of the visit.

- External audit of operational and maintenance procedures;
- External audit/inspection for obstructions, including within the current dust abatement equipment (potential affecting dust removal); and
- Undertaking corrective actions, based on the findings of the above, that will be implemented during planned maintenance shutdown periods.

With specific reference to development of stack emission limits, a series of interim deliverables have been agreed, with the first being the delivery to lenders of an update dispersion model report (using data collected during the two stack emissions monitoring campaigns). The delivery deadline coincided with the IESC visit to Guinea and thus it is confirmed that the report was received as per the agreed timeframe.

The afore mentioned external maintenance and operational audits were also underway at the time of the IESC visit with findings/corrective actions due to be reported in late January 2023.

In recognition of a challenging timeframe to complete the AQ CAP, the IESC recommended early appointment of an engineering design consultant to undertake both the external audits and any subsequent design works as necessary, rather than appointment of two entities consecutively, thus eliminating the risk of a time consuming second procurement of engineering services. CBG accepted the recommendation and appointed a single company to undertake the inspection, design and remedial action work. The Operations Director remains heavily involved in the process and actions within the AQ CAP were on track at the time of the visit.

### 7.3.3 Air Quality Monitoring

The IESC previously reported malfunctioning equipment was preventing collection of ambient air quality data from the Kamsar air quality monitoring station. The monitoring equipment has since been repaired, in some cases upgraded, and is producing data. Further progress has also been made with the installation and commissioning of an in-stack Continuous Emissions Monitoring System (CEMS) on Dryer 4. Monitoring also continues at various Project sites using portable monitoring equipment to measure concentrations of airborne particulates, NO<sub>2</sub> and SO<sub>2</sub>.

In summary, CBG's air quality monitoring capabilities have significantly improved when compared to prior years. The air quality data has not been assessed within this report and will be subject to further review upon receipt of CBG's 2022 Annual Monitoring Report.

### 7.3.4 Dust Suppression/minimisation

CBG's plans to undertake a study of fugitive emissions and opportunities to reduce dust emissions was highlighted in the previous IESC report.

The potential use of chemical dust suppressants, to be informed by CBG trials, has been discussed in previous IESC monitoring reports. Since the previous monitoring report, no progress has been made in this regard. However, during discussions with representatives from the maintenance/engineering departments, the IESC was made aware of a number of initiatives to reduce fugitive emission across the Kamsar site. For example, measures to reduce drop heights into hoppers within transfer towers (observed to be a major source of dust) through better management of bauxite levels in hoppers.

The results of air quality studies recognise fugitive dust emissions from the Kamsar site to be a major contributor to degradation of the airshed. The IESC is therefore fully supportive of the efforts current being undertaken to reduce fugitive emissions within the plant and encourages close coordination between the engineering and HSECQ departments to ensure dust minimisation initiatives are fully explored and captured within a revised AQMP. The new Sponsor and Champion structure should support cross departmental coordination.

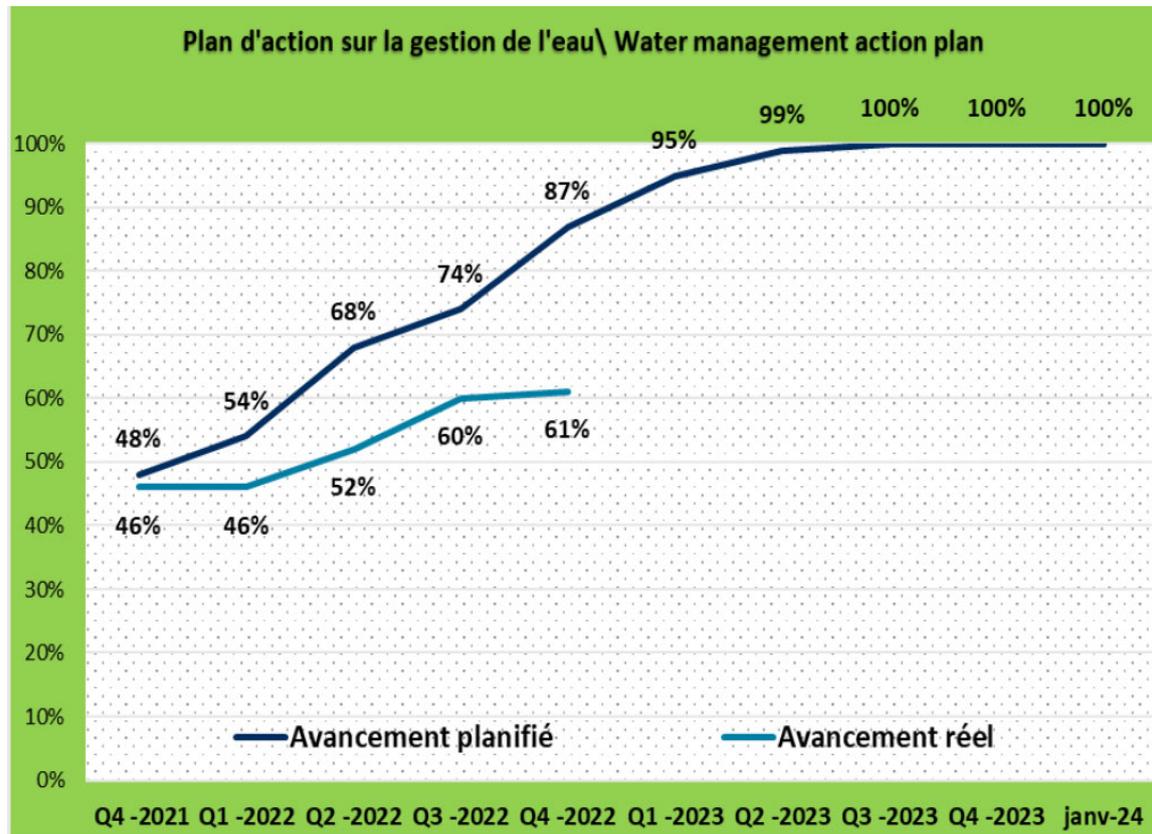
### 7.4 Water Quality

Water management was identified as a focus area for the monitoring visit; the IESC was able to meet with CBG’s staff responsible for implementing the Water Management Plan and visit areas within Kamsar and the Sangarédi mining areas. A team from the IESC, comprised of environmental and social specialist, was also able to meet with community members from the village of Fassaly Foutabhé. This covers a number of areas deemed by the IESC to be priority areas as follows:

- Implementation of Water Management Plan – general status
- Surface water drainage at Kamsar
- Oil/Water Separator at Tank Farm (Kamsar)
- Water resources at Fassaly Foutabhé.

#### 7.4.1 Water Management Plan – status of implementation

The figure below shows planned progress against actual progress implementing actions within the Water Management Plan as of Q4, 2022. As indicated above, the metrics are crude, but nevertheless actual progress is well behind planned progress in Q2, 2022. The completion of actions is planned for Q3, 2023 which compares to Q1, 2023 in an earlier version of the graphic. This strongly suggests the forecast has been adjusted since the IESC’s previous visit (in Q1, 2022) and is therefore expected to be more realistic. Nevertheless, actual progress is well behind the reforecast casting doubt over its credibility and CBG’s ability to meet the January 2024 completion target. See also Section 7.4.2 where further concern is expressed.



**Figure 7-2. Status of Water Management Action Plan implementation**

CBG should consider further periodic reforecasting and focus on bottlenecks/critical items preventing completion of actions by January 2024. This finding and recommendation is equally applicable to other environmental action plans.

#### 7.4.2 Surface water drainage at Kamsar

The Water Management Plan (WMP) includes an action to investigate drainage capacity at the Kamsar site. The action stems from studies conducted during the preparation of the WMP that indicate many drains and sediment traps do not have the capacity to meet a 1 in a 100-year 24 hour rainfall event following an expansion of the surface water drainage network associated with construction of the Phase 1 Expansion Project.

A number of preliminary designs were shared with the IESC, however these have been dismissed by CBG. Consequently, CBG plans to revisit the drainage design in January/February 2023 with the intention to undertake any necessary upgrade works by the end of 2023. Whereas this target date is theoretically achievable, the limited progress to date, coupled with the absence of a clear plan and schedule, puts this action at risk. Furthermore, this action alone brings the accuracy of the current forecast (Section 7.4.1) into question. It is therefore recommended that a clear timebound plan be developed and the timeframes are fed into a revised forecast, such that any slippage beyond January 2024 is known and communicated to lenders.

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

The IESC has reported in successive Monitoring Reports discharge of treated effluent from the oil water separator that exceed Guinean (50ppm) and IFC (10mg/l) oil in water limits. In the March 2022 IESC monitoring report, CBG's approach to resolving the non-compliant discharge was outlined. Since March 2022, CBG has refined the approach and agreed the way forward with Lenders. The agreement has formalised within a timebound Oil Water Separator Corrective Action Plan (OWS CAP). The key components of the OWS CAP are described below along with a status update for due actions.

Action	Status (Dec 2022)
Cleaning and maintenance of existing plant	Completed
Procurement and installation of a temporary quick fix	Modular OWS to supplement existing system has been procured and about to be shipped to Guinea  <i>Post visit note: Unit has arrived in Guinea and has cleared customs and commissioning expected in late February 2023.</i>
Performance audit (to identify cause of exceedance/propose a permanent solution)	Completed by an external specialist firm.  Several corrective actions have been undertaken to reduce oil at source, thus preventing oil reaching and overloading the current OWS.
Engineering and design for the permanent solution	Basic engineering completed and specification provide to potential suppliers.  Use of the temporary fix as a long-term solution has been rejected following a technical analysis.
Construction and installation of permanent solution	Not started

Other actions, outside of the agreed OWS CAP include procurement of a new IR spectrophotometer, intended to improve accuracy of oil in water analyses, which had arrived in-country at the time of the visit.

CBG has made good progress implementing the OWS CAP, albeit with some delays. The priority is to install the temporary unit and continue to operate the temporary solution until the permanent solution is commissioned. In the interim, the oil content of treated effluents discharged to the estuary continue to exceed agreed limits, albeit with some notable improvement in December 2022 and since the site visit.

#### 7.4.4 Mine Effluents (Fassaly Foutabhé)

The IESC has previously reported on high turbidity levels in a stream water, originating from springs close to the Parawi stockpile, which is used for bathing and washing purposes by the village of Fassaly Foutabhé (approximately 1km downstream from the springs). The cause of the turbidity is unclear, but likely associated with CBG's mining activities, and attempts to reduce the turbidity levels through construction of settling ponds downstream of the Parawi have proved unsuccessful. CBG is continuing to investigate the cause of the elevated turbidity in order to remedy the situation with the support of its shareholders (Alcoa and Rio Tinto).

During the December site visit, the IESC visited the affected stream (Fassalywol stream) and met with community members from Fassaly Foutabhé. The stream was found to be clear based on visual inspection and in use by community members (Appendix 2, Photo 16), however CBG informed that the increased turbidity occurs during the rainy season/higher flow rates. To mitigate for the poor water quality in the stream, CBG has installed new wells for the community's use.

The IESC also met with community members to hear their concerns, including those relating to water resources. Primary concerns expressed by the participants of the meeting included:

1. Deterioration in the water quality in the Fassalywol stream making it unusable;
2. Poor quality of water from the drinking water wells;
3. Failure of CBG to share minutes of meetings held with CBG; and
4. Water quality monitoring results were not being shared.

With regards the second concern raised by the community, the IESC visited the nearest well<sup>17</sup> and visually inspected the water from the tap and from within the iron removal device; the water was found to be very turbid and unsuitable for human consumption (Appendix 2, Photos 15 and 16). CBG representative explained that it is not responsible for maintenance of the wells; instead the communities (as owners of the facility) and SNAPE (National Water Supply Point Management Services), are responsible for maintenance of the wells/iron removal devices, including water quality sampling. Community members informed that SNAPE technicians do not visit regularly and on one visit told the community not to use the water from the well. Whereas the IESC is not in a position to analyse the water quality, there was undoubtedly a problem with the quality of water from the well visited. CBG informed the community that they had not been made aware of the specific problem, previously understanding there was a complaint relating to presence of insects in the iron removal device.

It is therefore recommended that CBG liaises closely with the community and SNAPE during further investigations and remedial works. Specifically, it is recommended that a CBG technical representative is present when the SNAPE technicians undertake maintenance/repair or sampling from wells in Fassaly Foutabhé and that CBG ultimately ensures that the mine affected

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<sup>17</sup> Four wells are available to community members of Fassaly Foutabhé. A fifth well has been decommissioned.

community has access to clean water. CBG should also use its best endeavours to ensure results of the water quality monitoring are shared by SNAPE with community members.

Regarding the fourth concern, CBG disputes the claim that minutes of meetings are not shared. The difference in opinion between the two parties may be due to the mechanism for dissemination of minutes i.e. certain individuals are not aware how/where minutes are circulated. It is therefore recommended that the means for dissemination and posting of minutes is clearly communicated and all minutes/records of dissemination are carefully filed so they can be made available upon request.

#### 7.4.5 Status of other IESC findings made in the March 2022 monitoring report

##### *Poor performance of the UV treatment system recently installed at the Sangarédi WWTP.*

CBG has informed that the treatment system has insufficient capacity to treat the volumes of water received. Procurement of a large replacement UV unit is ongoing.

##### *Removal of sludge from Sangarédi WWTP*

Sludge has been analysed and confirmed as non-toxic (does not contain heavy metals). The characterisation of the sludge will inform the disposal option, including potential use as a fertiliser (studies into disposal options are ongoing).

##### *Elevated levels of contaminants (COD and suspended sediments) found in surface river water surrounding the Kamsar processing facility*

CBG has attributed any contamination of the river from CBG facilities to be a result of contamination in surface water drains. An upgrade of the surface water drainage network and improved separation of clean surface water and contaminated/process water is identified as a corrective action. See Section 7.4.2, Surface Water Drainage, Kamsar.

##### *Bypass of the Kamsar WWTP*

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

At the time of the December 2022 site visit, mapping of the sewage network in Kamar City has been completed and damaged components allowing ingress of rainwater had been identified and corrective actions taken. In the meantime, a project to install a flow meter at the discharge is in progress although not commissioned. CBG is also constructing a third treatment module (1,200m<sup>3</sup> capacity) at the existing sewage treatment plant, significantly increasing capacity and minimising the need for rain fed effluents to bypass the WWTP.

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

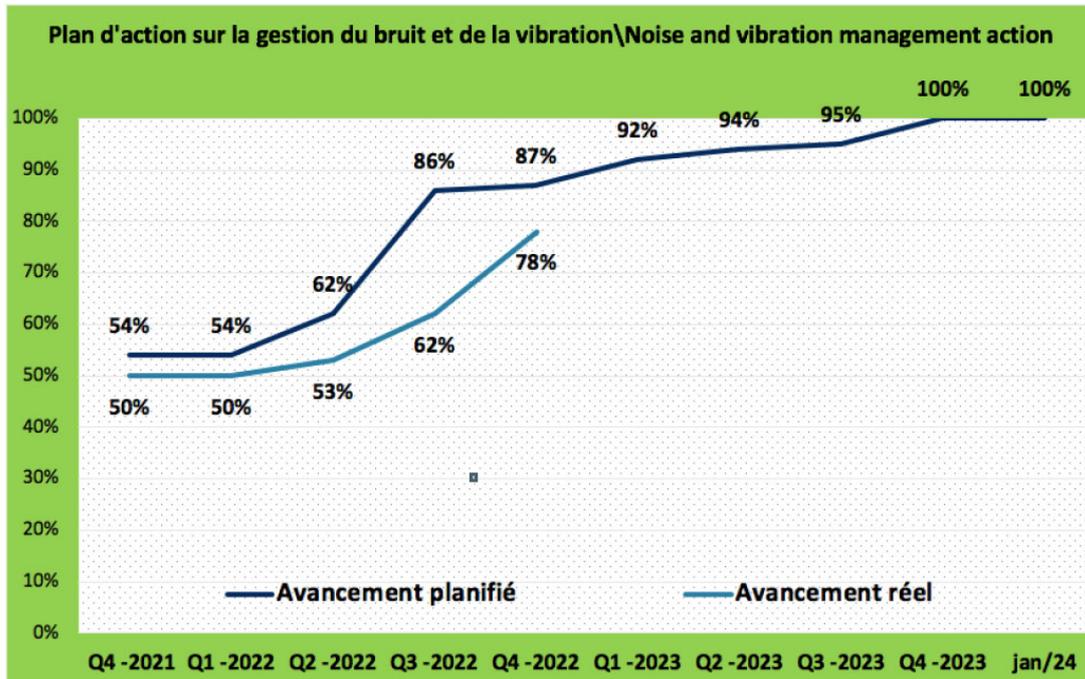
No significant progress made since October 2021 IESC Monitoring Report. CBG is currently looking to appoint a consultant to undertake the work

## **7.5 Noise and Vibration**

### 7.5.1 General

The IESC previously reported on the slow procurement and arrival of N&V monitoring equipment and accessories that were necessary to undertake all relevant monitoring. This equipment (noise meters and seismometers) is now in-country and in service. Consequently, noise and vibration monitoring programmes are being executed to plan without major difficulties.

CBG continues to implementation its noise and vibration Action Plan (included within the N&V management plan). The Figure below provides actual progress (light blue line) against planned progress (dark blue line). Although the metrics (number of actions completed) are a relatively crude measure of effort and progress, the graph shows actual progress to be catching up with planned progress and on track for all actions to be complete by Jan 2024 (the target date specified in ESAP #1) if current progress is maintained.



**Figure 7-3. Implementation of N&V Action Plan - actual progress compared with planned schedule**

The IESC notes the planned schedule differs from an earlier graphic which showed completion of all actions by Q2, 2023, suggesting a reforecasting exercise has taken place for the N&V Action Plan. Whereas this does not pose a major concern, the IESC notes that any timescale contingency has been significantly reduced.

7.5.2 Noise monitoring along the railway

One of the key recommendations made by the IESC relates to the mapping of sensitive receptors affected by the MUOA rail project, specifically those receptors identified within 50m of the railway that, based on predictive modelling, will potentially be impacted by noise and vibration from increased train movements in the future. This activity was previously reported to be delayed in October 2021 but was highlighted as a key action for 2022. The IESC has been informed that preliminary mapping, using satellite imagery has commenced and will be verified by in-field mapping of sensitive receptors. Furthermore, the IESC understands that the monitoring programme for sensitive receptors along the railway is ongoing (having been delayed due to the wet season) but additional new sites have been identified and are currently being monitored.

7.5.3 Noise Monitoring Mine Site (Fassaly Foutabhé)

CBG continues to monitor noise from active mining areas, including noise generated during both blasting events and general mining activities. Since the previous IESC site visit, a noise monitoring campaign has been dedicated to the village of Fassely Foutebhe (Fassaly Foutah Be). Focused attention was given to Fassaly Foutabhé because of its location and proximity to

multiple noise generating activities (COBAD Road, mining areas to the north and South and the Parawi stockpile area).

Noise monitoring was conducted over a 48-hour period on two occasions in May and then October 2022. During the May monitoring period, noise levels were found to be below the respective daytime and night-time limits, with noise levels falling during the night-time. However, night-time noise limits were exceeded during the October monitoring campaign, with noise levels seemingly increasing during the night. CBG has informed that investigations are underway to identify to source for the apparent noise increase at night.<sup>18</sup>

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

#### 7.5.4 Use of surface miners

Surface miners are used as an alternative technique to blasting in order to reduce peak noise levels that come with blasting events. The use of quieter mining techniques theoretically allows mining operations to take place in closer proximity to ecological and human receptors with minimal disturbance. The IESC has previously reported on CBG's plans to procure additional surface miners and repair a faulty surface miner and is able to confirm CBG is now equipped for the first time with 3 operational surface miners<sup>19</sup>.

In the March 2022 monitoring report, the IESC highlight CBG's plans to undertake noise monitoring it varying distances from the surface miner (300, 400 and 500m in line with an earlier IESC recommendation) to determine the proximity to communities a surface miner can operate without exceeding the noise guideline limits. This evaluation has commenced and early result indicate noise levels at a distance of 500m<sup>20</sup> from the mining work front (where multiple vehicles were operating) exceed the 55dB(A) day time limit. This finding would be inconsistent with the surface miner's manufacturers data indicating noise from the surface miner alone can be up to a maximum of 49dB(A), unless additional noise is generated by other equipment working at the workfront.

The use of surface miners to reduce peak noise levels was a key mitigation measure for mining activity in proximity of noise and vibration sensitive receptors and the operation of three surface miners is therefore positive development. However, further investigation is required to understand the contribution of the various work front vehicles/machinery to the cumulative noise levels and seek ways to further reduce noise levels. CBG has indicated this is their intention.

#### 7.5.5 Ground Vibration Monitoring for Blasting

The IESC previously reported that ground vibration during blasting is assessed against commonly recognised guidelines set by the Australian and New Zealand Environmental Council<sup>21</sup> and that measured ground vibrations were significantly below the recommended and absolute limits

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<sup>18</sup> IESC notes noise may be unrelated to mining activities, for example, weather events.

<sup>19</sup> Three surface miners operating at the mine on the Parawi 2a, Thiapikouré and Mbouroré 1a plateau (two were operational in March 2022)

<sup>20</sup> 500 m is the temporary buffer zone separating surface miners and communities in accordance with the Blasting Protocol pending further assessment by an independent expert under the CAO dispute resolution process.

<sup>21</sup> AZNEC, 1990. Technical Basis for Guidelines to Minimize Annoyance Due to Blasting Overpressure and Ground Vibration.

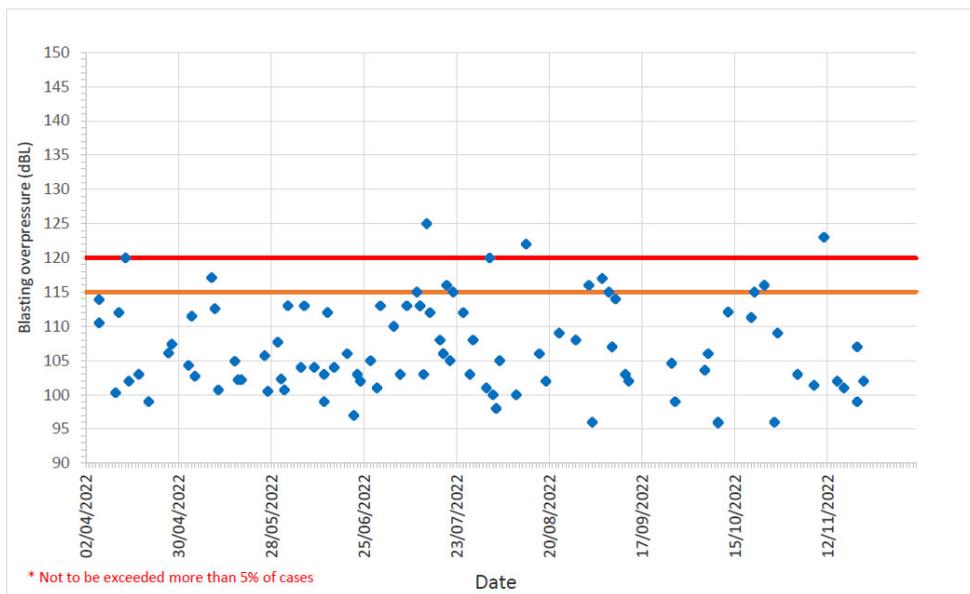
specified in the N&V Management Plan. Additional monitoring for blasting events since March 2022 also shows vibrations levels are comfortably below the limits adopted by the Project<sup>22</sup>.

7.5.6 Airblast overpressure

Airblast overpressure is monitoring by CBG and assessed against applicable project standards (AZNEC limits). The IESC ha previously reported several exceedances in 2021 and an apparent improvement in early 2022 following implementation of new stemming<sup>23</sup> techniques.

Figure 7-4 below shows the results of measurements taken from April through to December 2022 are generally below the absolute limit (red line set at 120dB<sub>L</sub>). The exceedances are relatively small (in comparison to earlier exceedances reported in 2021) with three exceedances out of ninety measurements taken. This number equates approximately 3%, noting the standard allows for up to 5% exceedances.

Noting and any exceedances are undesirable, there has nevertheless been a significant improvement in reducing airblast overpressure since early 2021 which is attributed to the new stemming technique.



**Figure 7-4. Overblast pressure measured in villages during blasting events (April to December 2022)**

7.6 Waste Management

An inspection of waste management facilities was made. This was supplemented with office-based meetings in which the Waste Champion and Sponsor participated.

CBG continues to generate industrial and domestic waste which are managed in accordance with a Waste Management Plan at locations in Kamsar (primarily Tora Bora) and Sangarédi. A number of positive developments/initiatives are currently underway:

<sup>22</sup> ANZEC, 1990. Technical Basis for Guidelines to Minimize Annoyance due to Blasting Overpressure and Ground Vibration. Australian and New Zealand Environmental Council. September 1990

<sup>23</sup> Stemming refers to the packing of material in the charge hole. Poor stemming results in blow outs/loss of energy. And increased noise/dust levels.

- Relaunch of the Waste Management Committee (WMC) with a new structure since October 2022 comprising members from HSECQ team, other CBG functions and including the Operations Director. Part of the WMC's mandate is to produce a waste management policy that will be underpinned by a long-term waste strategy (noting the current waste management plan is limited to the short/mid-term).
- A waste characterisation study has been completed which showed 40% of waste received at Tora Bora was green waste (and therefore can be segregated and treated separately).
- Pilot projects are underway to recycle plastic wastes, for example, production of plastic-based bricks that can be then used in simple construction (see Photo 2, Appendix 2). Discussions are also underway with REB in order to identify opportunities to commercialise plastic recycling.
- In addition to ongoing works at the main waste facilities in Sangarédi and Kamsar (Tora Bora) CBG has agreed contracts for the redevelopment of hazardous waste facilities in both Kamsar (site located north of the secondary crusher) and Sangarédi.

As indicated above, CBG operates waste facilities in Sangarédi and Kamsar. For the latter, two areas are used for the storage of municipal (primarily non-hazardous) and hazardous wastes. These are discussed in turn below.

#### 7.6.1 Kamsar (Tora Bora)

The Tora Bora facility, located within the CBG Kamsar area, was visited in March 2022 and again in December 2022. Findings following the March 2022 site visit related to waste management and H&S practices (H&S practices addressed in Section 6.1.2); in the section an update for the waste management practices is provided.

- The two incinerators at Tora Bora were non-operational at the time of the visit.
- A containerised office had been commissioned at Tora Bora<sup>24</sup>. The office not only provides a refuge for workers but allows for proper record keeping.
- A dome (semi cylinder shaped structure) has been erected to provide sheltered work area (protection from sun and rain) which also enables limited volumes of waste materials to be kept dry (for example, during segregation/pilot schemes).

As an overall observation, record-keeping and general waste management practices were good.

#### 7.6.2 Kamsar (hazardous waste facility)

CBG also operates a hazardous waste facility. This facility was originally used as a temporary site for wastes from the Expansion Project but has remained in use for hazardous wastes for several years. The IESC has reported a number of findings for this site in previous monitoring reports and many of these findings remain relevant, as follows:

- Poor storage of mixed wastes, for example, used batteries with exposed terminals mixed with metal wastes (Appendix 2, Photo 5)
- Poorly labelled containers
- Poor ventilation in oil contained containers

In addition, 200 litre drums containing oil/oily materials are also stored in open drums in an unbunded area with limited protection from rainfall (Appendix 2, Photo 3).

CBG recognises that the facility in its current design is not suitable for the storage of hazardous wastes. It has therefore signed a contract for the upgrade (redesign and enlargement) of the

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<sup>24</sup> The IESC had previously highlighted the office was in position at Tora Bora but had not been commissioned and was unused.

site. Construction of the new facility was imminent at the time of the IESC's December 2022 visit.

#### 7.6.3 Storage of hazardous waste in other areas

The IESC observed large volumes of oily waste stored in 200 litre drums adjacent to the old oil water separator. The drums were not shelter from rainfall and in many cases had no lid/poorly fitting lids and no secondary containment resulting in visible loss of containment and contamination of the soil (Appendix 2, Photos 7 and 8). The conditions observed were considered to be very poor practice and required immediate remedial action.

CBG undertook immediate corrective actions to secure the drums and prevent further loss of containment. Nevertheless, several failings have contributed to contamination of the site:

- Storage of hazardous materials outside of designated area;
- Failure to provide secondary containment and secure lids/protect from the weather; and
- Failure of CBG employees to identify this poor practice during its routine inspections/incidental observations.

In addition to the immediate actions taken during the site visit, further clean-up of the contaminated soil is required and awareness training to reinforce rules and procedures intended to prevent this type of poor practice. CBG should also consider an investigation to understand the root cause of these failings and thereby focus the corrective actions.

#### 7.6.4 Sangarédi

A brief visit was also made to the waste facility at Sangarédi. CBG intends to duplicate Tora Bora facilities in Sangarédi; engineering drawings are complete and CBG has also awarded a contract for the upgrade works (reconditioning works). However, construction of the waste facilities is yet to begin (see previous monitoring reports).

During the previous visit in March 2022 the IESC found evidence of burning waste (reportedly ignited before its arrival at the facility). In December 2022 there was no evidence of burning wastes.

#### 7.6.5 Waste Management Plan

The IESC reiterates its earlier findings that the Waste Management plan does not reflect CBG's current waste management practices with several good initiatives that are not considered in the WMP. The WMP requires a full update to reflect current thinking and strategy around waste management and the longer term (plus 5 year) strategy. Further updates will be required as the strategy evolves, but this should not delay an immediate update of the plan (see Appendix 2, Issue ref. Oct 2021\_025).

### **7.7 Resource Use and Energy Efficiency**

#### 7.7.1 Status Update

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

Progress in the implementation of the RUEEMP Action Plan was not included in the scope of the December 2022 site visit, but instead will be a focus for attention in subsequent site visits and review of the 2022 Annual Monitoring Report that is due in April 2023. In particular, the IESC will focus on the reporting of Scope 1 and 2 GHG emissions, normalised against bauxite production

volumes and transportation of bauxite, recognising CBG was developing a new methodology for GHG emissions calculations when this issue was last discussed.

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

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
Dec 2022 _ 031	Surface drainage, Kamsar	Preliminary surface drainage designs have either been rejected or misplaced. The planned upgrade of the surface water drainage system is well behind schedule and at risk of not being completed by January 2024.	A timebound plan should be developed and the timeframes are fed into a revised Water Management Action Plan forecast, such that any slippage (if applicable) beyond January 2024 is known and communicated to lenders.	<b>Moderate</b>
Dec 2022 _ 032	Drinking water quality at Fassaly Foutabhé	Community members have complained that water from wells fitted with iron removal devices is not potable. Visual inspection of one well supports the complaint.  Community members also claimed that minutes of meetings had not been shared (a claim disputed by CBG).  The stream at Fassaly Foutabhé continues to be highly turbid during the wet season/periods of rainfall (see issue Oct 2021_022, Appendix 3).	CBG should prioritise close liaison with the community and SNAPE during further investigations and remedial works. CBG technical representatives should be present when SNAPE undertake maintenance/repair or sampling from wells in Fassaly Foutabhé and ultimately ensure that the mine affected communities (including others impacted by CBG's operations) have access to clean water. CBG should also use its best endeavours to ensure results of the water quality monitoring are shared by SNAPE with community members.  The means for dissemination and posting of minutes should be clearly communicated and all minutes/records of dissemination should be carefully filed so they can be made available to interested parties upon request.	<b>High</b>
Dec 2022 _ 033	Noise	Noise monitoring campaigns at Fassaly Foutabhé have shown noise levels to exceed the night-time Project standards during one of the two campaigns (in October 2022). It is unclear whether the increased noise levels at night resulted from CBG's operations or other noise sources.	CBG has informed that investigations are underway to identify to source for the apparent noise increase at night. The IESC supports this and recommends CBG's findings are shared with lenders/IESC during subsequent site visits.	<b>Low</b>
Dec 2022 _ 034	Hazardous waste storage, Kamsar	Poor management of hazardous wastes was observed at:  a) the designated hazardous wastes storage area; and  b) an informal location adjacent to the disused oil waster separator.	a) The IESC acknowledges CBG's plans to upgrade the temporary hazardous waste facility. Nevertheless, in the interim, action should be taken without delay to improve poor practices observed in storage practices and thereby minimise the risks posed to workers and the environment.  b) The IESC acknowledges immediate corrective actions were taken at the time of the site visit. Further effort is required to	<b>Moderate</b>  (on the basis immediate corrective actions have been taken)

ID	Aspect	Issue Description	IESC Recommendation	Significance
		These poor practices posed risks to human health (poor ventilation), fire hazards (dumping of old batteries with metals/combustible materials) and contamination of soil and water resources.	ensure proper clean-up of contaminated areas and that measures (training, personal responsibility and improved site inspection) are put in place to prevent a repeat occurrence of this type of poor practice.  The disused OWS should be cleared of residual oils or repairs should be made to the roof to prevent ingress of rainwater.	

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

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

### 8.1 Update on Community Health and Safety related Management Plans

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

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

The CHSMP was finalised in Q1-2022 and its implementation is currently underway. Based on the action plan implementation status shared by CBG, preparation and implementation of a procedure for livestock crossing during transhumance has been completed (see ensuing paragraph for detail) in addition to actions previously reported as complete, for example, Blasting Protocol. Other items remain ongoing.

The following community engagement activities have been conducted to raise awareness on Community grievance mechanism, Health (with particular focus on communicable diseases), and Road / rail safety:

- 246 sensitizations made at community meetings (as of 15 November 2022).
- 1670 sensitisations on CBG radio on COVID-19, health and safety. Awareness-raising in French and local languages (as of 30 November 2022).
- 55 community sensitisations on railway safety, installation of footbridges and fencing (as of 15 November 2022).

The first annual Community Health and Safety Monitoring report to report on the CHSMP Action Plan and KPIs is planned to be prepared in the first quarter of 2023 and will be reviewed by the IESC in the next monitoring period.

### 8.2 Communicable Disease Prevention

CBG's CHSMP includes specific actions to minimize the potential for community exposure to vector-borne and communicable diseases such as the implementation of malaria and HIV and AIDS programmes. In particular, the CHSMP contains the following actions:

- Carry out as part of the Malaria Control Program, a survey in communities on their knowledge of Malaria and its modes of transmission
- Awareness actions and distribution of mosquito nets
- If necessary, and in collaboration with regional / national authorities and socio-health services, put in place actions to prevent and fight against epidemiological diseases (Ebola, Covid, etc.)
- Continue to implement HIV/AIDS/STIs Prevention Programme for employees and the public.

At the moment, CBG has not reported any need to undertake actions in relation to epidemiological diseases. Updates have been instead collected during the latest monitoring visit on the actions undertaken for the malaria and HIV/AIDS programmes – with details reported in the ensuing sub-sections - whose implementation the IESC understands still lags behind. The IESC plans to further discuss implementation of these programmes during the next monitoring visit.

### 8.2.1 Malaria

Two Terms of References (ToRs) have been issued by CBG for the establishment of framework agreements in relation to i) a baseline study, aiming to survey communities on their current concerns, to be used for monitoring and evaluation purposes; and ii) sensitisation and distribution of mosquito nets.

Both ToRs have been approved in April 2022 and launched in May 2022. Both ToRs which have been shared for review, cover the area of Kamsar, Sangarédi and Daramagnaki. Based on the information provided therein, CBG plans to have the baseline study realised between the first and third quarters of the 2023; and the sensitization and distribution campaign structured so that sensitization and net distribution occur before the rainy season (i.e. the first or second quarter of the year). At the time of the monitoring visit, the IESC understood that award of contracts has taken several months due to the challenges in receiving an adequate number of proposals. The IESC understood that companies' registrations to CBG's vendor lists was underway at the time of the site visit and CBG plans to conduct the baseline study before starting with the sensitization and net distribution campaign.

### 8.2.2 HIV and AIDS

In September 2022, CBG approved a ToR aimed at restarting the Human Immunodeficiency Virus (HIV) and Acquired Immune Deficiency Syndrome (AIDS) awareness and prevention activities programme. According to the ToR provided for review, CBG intends to establish a 3-year framework agreement with an NGO to carry out awareness raising, capacity building and voluntary screening activities in the areas of Kamsar, Kalaboui, Boké, Sangarédi and Daramagnaki. Each annual campaign will last 6 weeks, followed by a capitalization of the achievements, and will take place in the 4<sup>th</sup> quarter of the year, between November and December. CBG is currently evaluating the 5 proposals received based on specific evaluation criteria such as previous experience on the matter and knowledge of the local area. The IESC appreciates the steps taken to restart the HIV/AIDS programme but, considering the importance of such programme, recommends that for 2023 it starts as soon as the NGO is appointed, unless a clear and sound justification is provided in support of implementing such programme at the end of the year.

## 8.3 Community drinking water

During the meeting with the community of Fassaly Fouthabe as reported in Section 7.4.4), participants expressed concerns in relation to the poor quality of water from the drinking water wells. As already recommended in Section 7.4.4, CBG should liaise closely with the community and SNAPE during further investigations and remedial works to ensure the quality of the water from boreholes constructed for the affected villages.

As access to drinking water is a recurring concern for villages in the SoCo concession, CBG commissioned SNAPE to carry out a diagnostic visit and assessment of water needs in nearly 50 villages in the mine. A report is submitted to the CBG Board of Directors for evaluation which however has not yet been shared with the IESC for review

All in all, it is of key importance to urgently assure water supply through adequate and functioning boreholes, considering that many communities rely exclusively on them during dry season – which also coincides with Ramadan period this year.

## 8.4 Rail and Community Health and Safety

As part of the hard measures of the MUOA Transitional Measures Plan, 12 footbridges have been built by CBG with consultation with communities in Kamsar, Kolaboui and Tanéné and are now available to communities.

Betafences have been released from customs and ready to be installed, although CBG reported new requests from local authorities to prioritise a truck “parking area” (including toilettes and prayer areas) to improve traffic management during betafences construction. The IESC did not discuss any updates of the construction schedule; however, betafences construction launching and monitoring in Kamsar, Kolaboui and Tanènè is included among the planned activities in 2023. During the December 2022 site visit, the IESC observed several installed footbridges, however pedestrians were often observed crossing the railway with limited use of footbridges. It is clear that as long as the railway is accessible, footbridges will not be used by communities and safety risks remains high; erection of betafencing therefore remains a priority.

In the meantime, as part of the transitional measures programme, CBG reports the following measures to improve community safety:

- Securing of 2 pedestrian crossings at pk 108.8 and pk 111.6 at Sangarédi.
- Improvement of the safety of level crossings through the installation of 24 physical barriers on the main track.
- Installation of audible warning devices at level crossings level crossings in the towns of Kamsar (4) and Kolaboui (2), Kolaboui (2).
- Reduction of train speed (from 40km/h to 20km/h) in the built-up areas of Kamsar and Kolaboui.

In addition, CBG reports that 12 other horns have been ordered and will be installed at all protected level crossings.

CBG has also increased the number of flagmen (*Hommes piquets*) posts (30 posts for 90 people) in the Kamsar-Kolaboui-Boké and Tanène; and trained 83 flagmen in Kamsar and Kolaboui and 72 barrier guards in Kamsar and Kolaboui, based on CBG’s documentation shared for review. At present, the number of flagmen along the railway amounts to 200 (from Kamsar to Sangarédi). A map showing flagmen positions according to footbridges, and areas of high and low traffic concentration in the area of Kamsar, Kalaboui and of Boké and Gobire has been shared for review. This map was issued for the first time in June 2020 with the latest version shared with the IESC being dated April 2022 and therefore now out of date. During the December 2022 site visit, the IESC interviewed one flagman in Kamsar who showed knowledge of the emergency procedures and his roles and responsibilities. Nonetheless, most of the IESC’s observations from the March 2022 monitoring report remain valid (see Section 6.1.2).

Based on the updated data provided by CBG during the December 2022 site visit, 3 fatalities altogether occurred along the railway in 2022 (in February, March – already reported in previous report - and May). The IESC previously reported community fatalities involving mental health patients and CBG’s plans to fence a care facility supporting the mental health patients. At the time of the December 2022 site visit, construction of a fence at the Kamsar Treatment Facility was completed to reduce risk of rail fatalities / incidents of mental illness people.

Overall, recorded railway incidents are mostly associated with communities’ adoption of unsafe behaviours such as not respecting the physical barriers at the different level crossings; leaving children unattended in proximity of the railway, the use of railway bridges by cyclists and motorcyclists, and uncontrolled crossing on the railway. Based on the information provided during the December 2022 site visit, in 2022 CBG has conducted 50 community awareness-raising events on rail safety in the following locations:

- 8 schools (Kamsar and Kolaboui),
- 23 villages (Kamsar, Kolaboui, Boké, Tanéné and Sangarédi),
- 4 bus stations (transporters' unions of Kamsar, Kolaboui, Boké and Kamsar motorbike taxi),

- 3 markets (Kamsar and Kolaboui),
- 4 mosques (Kamsar)
- 1 group of cattle breeders in Kamsar, along the railway line.

Additional 8 awareness-raising meetings activities have been conducted as part of the planned betafences construction along the railway in Kamsar, Kolaboui et Tanènè, held with CBG, ANAIM, GAC, COBAD, micro enterprises (Très Petites Entreprises (TPEs), and local and prefectural authorities.

In 2023 CBG plans to undertake additional awareness raising activities such as the implementation of the communication strategy on railway safety in collaboration with a local with a local NGO to work on awareness raising for behavioural changes; and additional community awareness raising in support of an upcoming railway line rehabilitation project.

With reference to betafences installation, as part of the hard measures of the MUOA Transitional Measures Plan, the IESC understands that communities' concerns as expressed during stakeholder engagement activities pertain to potential impediments to access to health centres, and water sources. The IESC understands that CBG plans to handle concerns related to access to basic needs (e.g. health centres and water) through community development projects as appropriate. Other community concerns expressed relate to the division of the city; continued engagement with local authorities and communities to manage expectations and mitigate potential opposition to betafencing combined with close monitoring of community attitudes/grievances will be required.

Furthermore, the IESC had previously reported that stepped footbridges do not enable access by disabled people who are unable to walk/climb steps. In this respect, the IESC recommends as part of the wider Stakeholder Engagement Plan that a more dedicated engagement with people with reduced mobility be organised to check for any specific concerns pertaining to railway crossing and footbridges.

Two incidents have been also recorded in relation to livestock crossing in July 2022 during the transhumance with the herders of Katoungoro (Kamsar) to Tampagaya (Boké) including a herd of cattle remaining trapped in the Rio Nunez railway bridge at PK44.6 while an empty GAC train was passing at PK40 to Boké. In response to the incident, CBG undertook the following actions: drivers' sensitization, speed reduction of GAC's empty trains, awareness raising among the herders using the Rio Nunez Bridge. The IESC understands that two corridors have been identified for animals/livestock passage, including signing and flagmen, in Kamsar. Whereas this is a positive action, reportedly, accidents involving animals are more frequent in Sangarédi due to proximity of villages and livestock to the railway.

CBG does not routinely record railroad incidents involving animals unless a grievance is submitted, or the emergency procedure is triggered. Thus, the IESC recommends that CBG start recording animal collisions. This is deemed important also considering that one of the concerns expressed by communities during the consultation forum in Tanéné was that "CBG make provision for livestock accidents on the railway" according to CBG's documentation shared for review; and that one of the doléances (though appearing to be more a grievance) received in January 2022 from the community of Poora-Sakidjè was related to "the construction of a fence between the village and the railway in order to protect the cattle victims of countless accidents"<sup>25</sup>.

<sup>25</sup> Such request has been classified as unacceptable by CBG due to the following reason (as included in the "Comment" column): The CBG proposed to limit the speed and to perpetuate the bell. No possibility for fences was obtained because the multiusers do not reach this village. Accidents of goats and cattle are recurrent through the CFB of the CBG which transports fuel. (...)"

Based on the presentation provided during the December 2022 site visit, a procedure for the crossing of herds during transhumance has been validated and disseminated to the communities, although IESC has not yet had sight of the document.

## **8.5 Blasting Protocol Implementation**

During the December 2022 site visit, updates on the implementation of the blasting protocols have been shared with the IESC which are summarized hereinafter.

### **8.5.1 Buffer zones**

Since 1 October 2021, CBG has stopped all blasting activities within 1000 metres of a village. Surface miners have been used in the Parawi 2a, Mbourorè 1a and Thiapikouré plateaux at distances in excess of 500m from a village.

A 500 metre mining buffer zones had been delineated between November and December 2021 in four villages (Fassaly Foutabhè, Parawi, Mbourorè and Paragogo) in the presence of the sector chiefs or other community members and after the organization of information meetings in the villages of Parawi, Fassaly Foutabhè, Paragogo and Mbourorè. Nonetheless, CBG has concern about the increase presence of new houses within the buffer zones (i.e. between 500 and 1000m) whilst communities claim the demarcation of buffer zones is unclear. Moving forward, CBG will agree and clearly mark buffer zones with participation of representatives from affected communities and, based on the information provided in the Borrower's Quarterly E&S Certificate (Q4-2022) in the presence of the blasting expert who is expected to be appointed from January 2023. Community members will then be responsible for ensuring buffer zones are understood and respected, such that further development does not take place.

### **8.5.2 Blasting schedule, mitigation and control measures**

As per section 3.5 of the blasting protocol, CBG continues to notify all villages that may be affected by blasting 3 days before any blasting activity. In line with the Protocol, written information detailing the blasting events is provided and signed by CBG and the community representatives. In addition, a reminder is given on the day of the blasting activity

Prior to the blasting agreement and in line with section 3-7 of the blasting protocol, CBG in collaboration with Nitrokemine (blasting contractor) had already put in place mitigation measures such as reduction of the explosive charge; marking of the area of operation by sentries; drone surveillance of the outlines before the blast; and monitoring of noise and vibration (see Section 7.5, Noise and Vibration).

As concerns the surface miners, CBG confirmed to have invited the communities to attend the first start-up of the surface miners at the Parawi 2a plateau to raise awareness on how the machines operate.

As part of the monitoring of possible impacts due to blasting, the CBG in collaboration with the community assistants carries out inspections before, during and after each blast.

Before each blast, the CBG community agent and the community members selected as assistants carry out an inventory of the buildings before each blast. All remarks are recorded on the summary sheet.

During the blasting, the CBG community agent and community assistants stand next to the building closest to the blasting zone. After the blast event, a general check is carried out by the CBG community agent and the community assistants in the field in order to identify possible impacts (e.g. vibration induced damage) due to the blasting and to record any observations. All parties validate the form after the findings.

### 8.5.3 Blasting related grievances

Based on the information provided by CBG, the 5 blasting related grievances registered between October 2021 and February 2022, relating to cracks in walls/collapse of walls have been formally rejected (via written letters) by CBG due to observations and technical analysis of the facts (distance between the explosives and the house and monitoring of vibration levels). The IESC did not have access to the grievance register or any grievance form therefore it is unclear whether such resolutions were accepted by the complaints. However, as already reported in the IESC's previous monitoring report, one complaint has been submitted to the CAO for further consideration. See also Sections 7.5.5 and 7.5.6 relating to vibration and airblast overpressure.

Two further blast related grievances were submitted in March 2022 and May 2022. Following meetings with the complainants and the analysis, CBG understood that the same issues were already under CAO mediation process. That being the case, CBG has decided to address blasting issues through mediation to avoid duplication of effort and conflict with the mediation process. It is understood that such decision was officially communicated to the complainants on 21 October 2022.

Other blast relating grievances include: one concerning dust (now under CAO process); one recently concerning impacts to crops (ongoing); and two relating to a lack of information on the blasting programme (reportedly now closed).

### 8.5.4 Blasting Agreement Monitoring Committee

As part of the monitoring of the implementation of the blasting agreement, the parties agreed to set up a monitoring committee under the leadership of the CAO. The committee is composed of 3 representatives of the CBG and 13 community representatives, one from each village: Hamdallaye, Fassaly Foutabhè, Parawi, Mbourorè, Paragogo, Boundouwadè, Cogon Lénguè, Ndantafongnè, Horè Lafou, Sinthiourou Lafou, Parawol Malassi, Lafoun Mbaila, Samayabhè. Based on information provided by the CBG, members have received training from the CAO.

Seven meetings have been held by the committee to date, however since August 2022, the blasting monitoring committee has been suspended because important issues (demarcation verification process, houses built in the buffer zones) needed to be discussed in joint plenary sessions in order to find an agreement between the Parties (CBG and Communities). The IESC expects that meetings will have been re-established prior to the next IESC monitoring visit (scheduled for July 2023).

From the review of the Q4, 2022 Borrower's Quarterly E&S Certificate, it is understood that the selection process for the blasting expert is being finalized and that this expert is expected to go to the field in January 2023.

## 8.6 Community Development

### 8.6.1 Updated Community Development Plan

The Community Development Plan (CDP) has been subject to an extensive revision for the period 2022-2025 which is currently under validation of the Policy Lenders with the following major points reported hereinafter:

- Provisions for the handover of infrastructure to be constructed as part of CBG's community investment activities and CBG's ultimate exit upon closure of operations: some integrations have been made, but there is still no consideration for the long-term sustainability of this infrastructure nor a handover / exit strategy, as recommended under Good International Industry Practice (GIIP).

- Provisions to ensure that women and any groups identified as vulnerable in CBG's area of influence will have equal opportunity to participate in community development design, planning, implementation and monitoring (therefore not only in engagement activities) to ensure they are not excluded from this process and that their needs are catered for.

#### 8.6.2 Implementation of the 2022 action plan.

Based on CBG's documentation received for review, the following 14 community projects were selected in 2022 in the prefectures of Boké, Téliimélé and Gaoual:

- Renovation of 4 primary schools.
- Construction of 2 primary schools.
- Construction of 2 health posts.
- Construction of five 5 boreholes.
- Construction of one 1 shed for a market.
- Construction of one 1 town hall.
- Completion of work on one 1 cultural centre.
- Completion of the development work of the Boké Geomine Institute.

10 community projects have been completed and commissioned and 4 projects are under development. 13 joint projects have been selected for their implementation in 2023, and their presentations to the communities is awaiting validation by the Board of Directors.

During the December 2022 site visit the IESC visited the Primary School in Sossoya located approximately 12 km from the rural community of Kamsar. The prefectural directorate of education has assigned 3 teachers to this school where 150 pupils are enrolled, including 49 girls, and three classes. The IESC confirm the school to be operational and in good conditions. Of note, prior to the construction of the school, children were travelling long distances which had resulted in accidents. Thus, in addition to other benefits, the safety of the children attending the school has improved.

In relation to Income Generating Activities Support Projects or Projets d'Appui aux Activités Génératrices de Revenus (PA-AGR), CBG has completed evaluation of the pilot phase (Phase 1) of the PA-AGR in partnership with IFC Advisory; and Memorandum of Understanding is being finalised for the implementation of a Phase 2 consolidation phase incorporating the recommendations coming from the Phase 1 evaluation. For the PA-AGR extension, CBG reports identification of a new structure for the development of new income generating activities with a contract already signed with the provider.

Among the other salient facts, CBG also reports the following activities:

- Secured a grant of USD 100,000 from CSL GROUP (Alcoa's partner) to support the communities of the port of Kamsar (Dapiare, Port Néné and Taidy) in income-generating activities.
- Contact with firms and NGOs (Charente Maritime, Pride Guinea, CEFACAM, CEFAD....) to discuss the possibilities of collaboration with CBG in the implementation of the community development plan
- Meeting with the beekeeping company API-Project to discuss the extension of appropriate techniques for the production and marketing of honey.
- Meeting with a women's group in Kamsar (mainly of widows) who are involved in saponification (soap making) and would like support in the framework of income generating activities.

Among the areas for improvements CBG considers strengthening the education theme to be one of the priority areas for Community investment, as well as the partnerships with third parties; and stakeholder capacity, the latter by supporting the authorities in building the capacity of teachers at primary level.

The Community Development Action Plan is lagging behind the planned targets (68% actual versus 86% planned) with the actions that have not started including: the malaria program (refer to Section 8.2 for more details); and the census of basic social infrastructure financed or renovated by the CBG. In relation to the latter point, from discussions held onsite and document review, the IESC understand that a ToR to conduct a socio-economic baseline study in the CBG areas of operation on basic social infrastructure has been approved in December 2022. Based on its review, its main objective is to “establish a baseline of basic social infrastructure data in the CBG's areas of operation in order to develop performance indicators of the impact of the CBG's investments”. Data are required to be collected in the localities of Kamsar, Kolaboui, CU de Boké, Bintimodia, Tanéné, Sangarédi, Missira, Daramagnaki, Wendou Mbour and Koumbia. The ToR requires collection of indicators pertaining to education, health, Water & Hygiene, Socio-Economic and Cultural, and migratory indicators in the Kamsar, Kolaboui, Boké, and Sangarédi areas. The activities are required to be undertaken in two months with February-March 2023 being the timeframe suggested in the ToR. While such timeline is expected to be updated once the NGO is selected and appointed, the IESC expects that results of this assignment to be available and discussed in the next monitoring visit.

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

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>IESC Recommendation</b>	<b>Significance</b>
Dec 2022 _035	Communicable Disease Prevention - Malaria	Malaria programmes implementation still lags behind.	Malaria Programme to be developed as a priority.	<b>Moderate</b>
Dec 2022 _036	Communicable Disease Prevention - HIV/AIDS	HIV/AIDS programme implementation still lags behind. In addition, based on the ToR, each annual campaign will take place in the 4 <sup>th</sup> quarter of the year, between November and December.	HIV/AIDS Programme to be developed as a priority.  Particularly in 2023, CBG not to wait for Q4-2023 to start the campaign as per indication in the ToR.	<b>Moderate</b>
Dec 2022 _037	Community Health and Safety - Railroad Safety	Betafences are now customs free and ready to be installed though new requests from local authorities now require prioritization of a truck "parking area".	Betafences installation to be installed as a priority	<b>High</b>
Dec 2022 _038	Community Health and Safety - Railroad Safety	Community concerns in relation to access to health centres, water planned to be managed via community development projects. Other criticisms exist on betafencing "dividing the city in 2 zones".	CBG to continue engaging local authorities and communities to manage expectations and mitigate potential opposition to betafencing and closely monitor the use of footbridges and acceptance by communities as the betafencing is erected.  Attention to identify and record grievances concerning betafencing should be particularly paid.  Also refer to March 2022_024	<b>Moderate</b>
Dec 2022 _039	Community Health and Safety - Railroad Safety	Stepped footbridges do not enable access by disabled people who are unable to walk/climb steps.	As part of the wider Stakeholder Engagement Plan a more dedicated engagement with people with reduced mobility be organised to check for any specific concerns pertaining to railway crossing and footbridges.  Also refer to March 2022_025	<b>Moderate</b>
Dec 2022 _040	Community Health and Safety - Railroad Safety	Accidents involving animals more frequent in Sangarédi due to villages closer to the railway. Such accidents are recorded as grievances only (if received).	CBG to start recording animal accidents due to railway crossing to ensure appropriate monitoring.	<b>Low</b>

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

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

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

#### 9.1.1 Resettlement Physical Aspects

##### *Hamdallaye*

Pending works have been completed or are in the process of being completed in the next three months. The IESC considers that CBG has now fulfilled its commitments for the infrastructure pertaining to the physical aspects of the Hamdallaye resettlements. However, there appears to be a major risk of being perpetually weighed down by new requests from the community until the transfer of ownership and security of tenure are completed and communicated.

With regards to community infrastructure, the following work has been carried out since the March 2022 visit:

- Drainage improvement. According to CBG, there is only one area left (within the health post courtyard) subject to flooding which will be integrated in the additional work package (see below).

An additional work package, on which the designated contractor (SIGMA) is due to commence on 12<sup>th</sup> December 2022 and includes:

- Fencing of Hamdallaye school;
- Solar electrification of the school head teacher's house and the health post/midwife's house;
- Development of the interior courtyard of the health post aimed at addressing the remaining flooding phenomenon occurring in the courtyard;
- Supply and fixing of gates for the Mosque courtyard and two additional blocks of latrines of 2 cabins with 2 ablution benches at the Mosque;
- A block of latrines of 4 cabins for the Community Center;
- For the income-generating activities (Projects managed through CECI): a mesh fence for small ruminants, a block of latrines of 2 cabins for the farm, a block of latrines with 2 cabins for the Bakery and electrification with solar panels of the Bakery.

In addition to the SIGMA contract, another contract is in the process of being awarded in December 2022 to develop 2ha of pastoral land (on community land) in response to an old grievance of herders: fencing, drinking troughs, a borehole equipped with an electric solar pump, a shelter, a latrine, planting of trees and fodder species, monitoring and maintenance for a period of a year and a half.

The IESC December 2022 visit confirmed:

- teaching is still ongoing at the Hamdallaye school for 347 pupils, including 157 girls. The school is already reaching its full capacity with 6 classrooms ranging from 45 to +90 pupils. There are reports of pupils from outside Hamdallaye village. The classrooms and school area are maintained in a clean and neat condition under the head teacher's supervision;
- The health post is still operating, providing primary level health care. CBG indicated that a private clinic has opened in Hamdallaye and that one of the Hamdallaye lineages is promoting this clinic rather than the health post in a context of conflict between lineages within Hamdallaye communities;
- The community centre is still not operational as the community is waiting for the additional work to be carried out (see above). According to CBG, the Hamdallaye community intend to

use it for community events (weddings, burials, etc.) but the site management mechanism (e.g. cost recovery mechanism) remains unclear;

- The market, requested by the Community, is unused.

A solution for solid waste management, assessed as not satisfactory by the IESC during the March 2022 site visit, is yet to be found. A recommendation was made to engage the Resettlement Committee and the youth to set up an Economic Interest Group (GIE) to collect and dispose of the waste. CBG indicated that the youth were consulted but displayed no interest in carrying out such an activity. Discussions within the CBG team is therefore directed toward a more pragmatic solution such as the creation of basic hole landfills and/or potential incineration tanks.

With regards to private resettlement dwellings, CBG indicated that:

- roof repairs were completed in October 2022 through a local company and that the provisional acceptance of the work was carried out with the Hamdallaye village chief/‘chef secteur’ on 11<sup>th</sup> November 2022;
- remaining house repairs (wall, door and window repairs) will be conducted by SIGMA under the contract scheduled to start in mid-December 2022;
- top soil restoration on the “tapades” was completed in Q3 2022. Six households declined the addition of top soil as they reserved the area for other purpose (i.e. building extensions). Cultivated tapades were observed during the site visit and confirmed by a group of women (from the market gardening GIE).

In terms of security of tenure, the keys of the main community infrastructure have been officially transferred to the appropriate supervisory authorities: Health Post, School, Mosque.

However, the transfer of ownership for the houses and the integration of the village to the management of the Commune of Sangarédi is not completed:

- There has still been no formal progress in the State-endorsed allocation of residential land at the Hamdallaye resettlement site. However, it was explained to the IESC that the CBG resettlement and Legal teams have agreed on a way forward. The legal team is drafting an attestation that would be equivalent to a mining land retrocession of the new Hamdallaye site (provision for the final attestation to be ready by the end of January 2023). The Mayor would then be able to draw up property titles. The same process will be used for the formal allocation of the 56ha of agricultural land (currently fallow to allow regeneration);
- The CBG legal attestation will also be determinant to have the Hamdallaye territory officially pass under the management of the Sangarédi Commune and legally remove CBG from future liabilities (e.g. road maintenance, waste management);
- The final acceptance of the houses by the PAPs is stalled until the securitisation of the residential land is completed. For the repairs, the CBG team has repeated during interactions with the community that this is the last intervention they will do with provisional acceptance on completion of the repairs (done in November for the roof) and final acceptance one year later, once the land securitization process and the property transfer can be completed.

It should be noted that due to an omission in the itinerary submitted by IESC to CBG prior to the visit, the Hamdallaye resettlement committee was not met during the December site visit. Minutes of the meetings with the Hamdallaye resettlement committee from March 2022 were requested post-visit but not provided.

### *Fassaly Fouthabé*

The IESC attended a meeting with the Community of Fassaly Fouthabé which was an opportunity to discuss:

- **The school which is still not staffed.** CBG reported that they have learnt from the Education authorities that the school does not meet the threshold of 60 pupils necessary to assign a teacher. However, the Hamdallaye School Head Teacher has offered to assist CBG in identifying pupils in Fassaly and the surrounding villages and is confident that he can advocate the assignment of a teacher provided 40-50 pupils are identified for the next school year. Fassaly community explained that with CBG financial support they originally sent the children to relatives/acquaintances in Hamdallaye to attend the school there but that now most of the children are sent to relatives or the families that are renting small units in Sangarédi as this is more convenient. Interest in Fassaly school, given the village request to be resettled should be assessed during the pupil identification process.
- **Water.** The situation is confusing with the community stating that they cannot use the boreholes, including the two new ones, because of the malfunction of the iron remover and/or the turbidity of the water and that the water quality in the stream is still degraded. The water sampling analysis had not yet taken place. Several explanations were given by CBG, the Community, CECI (which installed the old boreholes in 2008) and SNAPE (indirect reports) including: misuse of the iron remover, misinterpretation of SNAPE instructions, seasonality of the water stream turbidity, too many boreholes in a limited area degrading the water quality, water claims as part of wider demands (CAO complaint, desire to be relocated) etc. (See Section 7.4.4 for further discussion).
- **Physical resettlement.** The Community had sent an official letter to CBG in October 2022 requesting the resettlement of the village and the request was reiterated during the IESC meeting. Their arguments are that they are surrounded by CBG activities with little land remaining, suffering from nuisance and with poor results from the livelihood restoration activities. (See section 9.4, Cumulative impacts).

CBG also indicated that the following outstanding work has been completed:

- Irish crossing to control erosion by the school;
- Installation of 4 iron removers and repairs/replacement of pumps.

And that the following work was planned under the SIGMA contract starting in mid-December:

- The construction of a fence from Almadjadja to Fassaly Fouthabé;
- The construction of a mesh fence for small ruminants;
- The construction of a block of latrines of 2 cabins for the farms;
- Electrification with solar panels of the school head teacher's residence and Residence of the head of the health post;
- The construction of school fences in Hamdallaye and Fassaly Fouthabé.

#### 9.1.2 Livelihood Restoration

Following the last IESC visit in March 2022, recommendations were made to develop an action plan to correct the poor results of Income Generating Activities (IGAs) and failings in the Project management of the LRP developed and implemented by CECI. CBG acknowledges that the approach chosen for the Hamdallaye and Fassaly Fouthabé LRP (community-based, with important infrastructure) was finally found to be inadequate for Hamdallaye. However, they considered that it would be detrimental to stop the Project at this stage and decided to work with CECI on improving Project Management and Monitoring & Evaluation. A contract addendum is

under review. CBG provided transitional measures (rice, oil, etc.) to the PAPs in July 2022 to cover the income gap as the IGA had not yet generated revenues.

#### *Hamdallaye*

The status of the IGAs in Hamdallaye is as follows:

- **Gardening**

The design and construction of the new market garden in a new site are envisioned for Q1 2023 after completion of the tender process which was under way at the time of the visit. This new site aims to relaunch the market gardening activities after the failed attempt on the previous site (stolen or dismantled equipment, questions over soil quality). A new site was selected by the community in August next to the Ndagara forest but members of the Community raised strong opposition to the use of this site and another site (on communal land, not private land) was then identified. The IESC was able to meet with four representatives of the female Groupements d'Interet Economique who reported they are still motivated to relaunch the activity.

- **Small ruminants**

CECI provided 102 goats in 2022 to supplement the 43 provided in 2021. The activity/GIE does not seem to be really operational with the goats not visible during the visit. CBG agreed to additional work that is still pending CECI implementation: connection to the chicken water borehole, installation of a water tank and construction of drinking troughs. CECI has submitted a draft hand-over plan to CBG. The fencing of the sheepfold area is part of the CBG-sponsored SIGMA additional work package to commence in mid-December.

- **Poultry**

The poultry farm was empty (apart for guano kept for selling to the market garden activities) as the first batch of chickens had finished their production cycle and had been sold. CECI is currently preparing the financial statement of the cycle to present to CBG before allocating the egg and chicken sale proceeds between GIE members and the cash account to restart a new production cycle. As a result, the 27 GIE members (20 women and 7 men) reported they have not yet received any income for their work. It will take +6months after the arrival of the new batch of chicks to generate new egg sales. It is unfortunate that there is a halt between two batches of chickens and/or that the project did not plan for two batches of chickens raised 6 months apart to avoid downtime in production. The sustainability of the model remains unclear although CBG/CECI reports a close to break-even financial year. According to CECI, a staged approach where CECI would decrease the working capital provided over the next two batches could work. Asked about the rise in the feed price, CECI indicated that it can be managed by building up maize stock off the peak price (CECI declared that the animal feed is (now) made locally). Specific measures were put in place during the avian flu epidemic in consultation with the veterinary authorities and the Poultry farm was not hit.

- **Grasscutters**

This activity had not started at the time of the December 2022 site visit despite new investment agreed by CBG and under CECI's responsibility (hydroponic fodder production, construction of a hangar). The receipt of animals is planned a short time after the additional infrastructure is built. A few days before the site visit, the crops adjacent to the grasscutters' building and planted for fodder had burnt in what CECI suspects to be sabotage.

Two members of the 17-person GIE met started to make new infrastructure requests to CBG (borehole, electrification, latrine, shelter for the keeper) until they declared that there had been no activity in 3 years and that it should be abandoned. CBG replied that if that was their decision, the members of the GIE should officially notify CBG.

- **Bakery**

The activities at the Bakery have not resumed despite CBG new investment in Q3 2022 (tricycle, in-kind working capital) and agreement over additional work to commence mid-December (solar electrification, latrine). The President of the GIE reported that the activity had not resumed because the GIE members were busy with agriculture in the fields and because the floor provided by CBG was of bad quality. Another GIE member corrected this assertion stating that the floor had been attacked by insects due to poor storage conditions. The President of the GIE demonstrated a lack of motivation (and a new request for working capital and investments). It is difficult to assess if this lack of motivation is shared equally by the other GIE members, the President being an influential member of the community. The situation is to put in perspective with the self-initiative of an individual in Hamdallaye who by himself contacted the bakery trainer used by CECI, learned the job and opened a bakery in Hamdallaye, said to be successful.

To summarize the IGAs situation, despite additional investment by CBG and discussions with CECI, none of the activities were operating during the visit. The question about the future of the Bakery, the small ruminants and grasscutters activity was raised again. Regarding the Poultry and Market garden, the GIEs (mainly made up of women contrary to the other GIE activities) expressed the desire to pursue the activities.

CBG has initiated consultations with the youth of Hamdallaye (when testing GIE options for waste management) who expressed an interest in Poultry farming and reforestation activities.

#### *Fassaly Fouthabé*

The situation is slightly better in Fassaly Fouthabé than in Hamdallaye. The community-based approach is probably more adapted to a small community like Fassaly Fouthabé, though tensions within GIEs are also emerging.

To elaborate further:

- **Gardening**

The GIE has been established but a bush fire at the site restricted the extend of the activity. However, women did undertake some planting activities in 2022 using seeds provided by CECI. The site is going to be rehabilitated at the same time as that of Hamdallaye. The tender process is under way. Members of the GIE indicated their willingness to pursue the activities.

- **Small ruminants**

Goats have been delivered, are still roaming through the village and no intensive breeding method is in place.

- **Poultry**

As in Hamdallaye, the production cycle ended in November with sales of the last chickens. They have already sold the guano. The GIE has 25 members including 15 women who have not yet received any money from the activity as sale proceeds are kept in the GIE account until CECI assess the profitability of the 1<sup>st</sup> cycle of activity and the allocation for each members. CECI indicated that the total proceeds are +200 million and from their calculation, each member of the GIE should receive around GNF 5 million (570\$), the remainder would then be use for the new production cycle (chickens, feed). CECI indicated that the mortality rate around 11% was lower to that of Hamdallaye (15%) which was already considered low. The GIE members explained that transporting the eggs on the bad roads with the tricycle has been a challenge, as well as water (now resolved).

- **Grasscutters**

The first batch of grasscutters arrived a few weeks before the IESC visit. Three GIE members had been sent to Dubreka for a 10-day training course and are about to train other GIE members. The trained members appear to take their responsibility seriously, restricting access to the grasscutters' area to avoid disturbing the animals. The grasscutting activity was presented by CECI as revenue for the entire community (a village fund) but one of the GIE members asked CBG/CECI during the visit if it was not possible to change the model so that only the individual working on it receives the income.

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

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

- Priority to bring forward the land tenure schedule to close the transfer of ownership of the village to the Commune and final acceptance of the houses by the PAP. Meanwhile, reiterate the general principles that, after handover, CBG will not be involved in the operation, maintenance and management of community facilities, solid waste collection, road maintenance and so forth.
- Assist the Hamdallaye resettlement committee in establishing a sustainable solid waste elimination system (small landfill and/or basic incineration system as suggested by CBG).

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

- Continue efforts, along with the Hamdallaye School Head Teacher, to obtain a teacher at the school or explore alternative avenues such as Maitres Communautaires.
- Clarify, follow and document the water situation in Fassaly Fouthabé in coordination with SNAPE and the Community. Swift action is recommended to ensure that the community has clean water before the stream dries up in the dry season.
- Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around Fassaly Fouthabé, consult with the Community and the authorities and make a decision, aligned with PS1 and PS5 requirements, regarding the resettlement of the village (see also Section 9.4, Cumulative Impact).

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

Despite CBG efforts to rectify management of the CECI Program and new important infrastructure investment, the results are still disappointing and will not allow for the restoration of livelihoods.

The IESC recommends:

- Acknowledging the reluctance of members to continue with the bakery, small ruminants and grasscutters (only in Hamdallaye for the latter) activities, transferring ownership of the infrastructure to the GIE and/or assisting them in selling the infrastructure and sharing the sale proceeds.
- Maintaining market gardening and poultry activities but rethinking the model, and potentially finding a new partner, in order to make the activity sustainable and avoid breaks between production cycles.

And reiterates its recommendations to:

- Broaden the scope of livelihood restoration to more non-agricultural activities, including vocational training relevant to "urban" and mining jobs, and small business development.
- Target the youth, especially for the non-agricultural activities described above.

## 9.2 Updated Resettlement Policy Framework (RPF) and Compensation Matrix

During presentation of CBG Management at the beginning of the IESC visit, an update of the roadmap and management plans was provided. Each management plan has associated actions plans and the corresponding progress made with them. The Stakeholder Engagement Plan and the Community Development Plan are part of the management plans included in the road map. Inclusion of the RPF and associated action plans (RAP/LRPs) in the roadmap would make sense.

The new version of the RPF is still not validated after almost two years of review. The current resettlement processes are therefore not managed by a company policy (the 2015 RPF is outdated compared to current CBG practice and the new RPF is not validated). CBG and lenders are reaching an agreement on the RPF principles but it is difficult to define the right approach for land compensation given the parameters: PS5 compliance, context (speculative practice with extensive cashew nut plantations, an opportunistic behaviour probably linked to CBG past approach of compensating only assets/trees and not the land), ease of implementation. The following approach was approved during the IESC visit:

- CBG will propose a solution that is feasible for land compensation (CBG acknowledged that those in the draft RPF were not practical);
- Meanwhile Policy Lenders will review the rest of the document; and
- CBG and Policy Lenders will then make a call to validate the RPF as a priority.

The compensation matrix in the RPF is still indicated as under review by the CBG Management. The land unit prices for agricultural and fallow land were however presented during the visit and are similar to the amounts established in the 2015 Compensation Matrix. According to CBG, these prices are still valid but a thorough review of these prices with the provision of the methodology used is recommended to avoid future claims.

## 9.3 LRPs

### 9.3.1 LRPs awarded to Conakry-based provider Phénix include: MUOA, Kankalaré, Contingency block, Plateau Thiapokouré

Phénix has rented and refurbished a base in Sangarédi, operational since July 2022. There are now +10 full-time employees on the ground (all equipped PPE/Uniform). The Phénix team accompanied CBG and IESC during the LRP site visits. Their team appears already well connected in the villages and the initial feedback from community meetings (Paragogo, Fodecontéa) is positive. The IESC were able to witness Phénix technicians already giving agriculture/animal breeding advice to PAPs during the visits.

The Phénix approach is individual-based with limited infrastructure investment, favouring the usage of local material and the improvement of existing techniques, plus the use of bio-pesticide for agriculture. They are not creating new activities but working with community members who are already engaged/have already re-engaged in some form of economic activities: agriculture, animal breeding, small commerce or services.

#### *MUOA LRP*

The consultations for the diagnosis and program scoping were completed in October 2022 and a Program Design submitted to CBG. The program was due to be validated by CBG before the end of December 2022. The Program document was not reviewed by the IESC during the visit

255 PAPs are eligible for the MUOA LRP and a small number of eligible PAPs were visited during the IESC visit:

- a motorcycle garage in Kamsar that will be assisted with marketing, in workshop organization and (pending validation) with a small working capital.

- A cashew and palm tree plantation in Kamsar that will be assisted with plantation management (the planter had apparently made basic errors which explain the poor yields).
- a market garden GIE in Fodecontea. Phénix indicated they were planning for a borehole with a motor pump in the Program submitted to CBG (not yet approved at the time of the visit) but CBG informed them that they want to avoid this type of investment and would rather validate improved borehole without motor pump.

#### *Kankalaré, Thiapikouré and Contingency blocks LRPs merged*

The three LRPs have been merged and are following the same approach as for the MUOA LRP.

750 PAPs have been identified as eligible.

Phénix presented the result of the diagnosis consultation just completed to CBG and the IESC during the site visit and they were about to start the Program design.

The IESC, CBG and Phénix met with Paragogo Community and visited the women's market gardens along the river, PAPs animal shed and the school.

- The school has recently been staffed with a teacher and the headmaster hopes a second teacher will be posted soon as the sole classroom is housing 135 pupils. If not, he will split the class into two sessions (morning/afternoon).
- CBG will rehabilitate a road to Sangarédi (the community has chosen one route as two options were possible) as the current mainly used road crosses the mining haul road.
- The community raised the problem of the availability of farmland stating that where they used to farm with one or two families on a plot, they are now 10. The women stated they have the same issue with market gardening plots that they now need to share with a larger number. The village representative asked CBG if new food assistance will take place this year to bridge the income gap as was done in September 2021. CBG indicated to the IESC that the village still has extensive agricultural land, contrary to the community's view and that new food assistance was not scheduled. This question of land availability/cumulative impacts is further detailed in Section 9.4
- Youths from the community expressed interest for non-agricultural activities, to avoid a rural exodus.

Some PAPs from Fassaly Fouthabé are also included in this LRP (for new impacts that differ from those addressed via Hamdallaye & Fassaly Fouthabé RAP) and one of the Community representatives indicated that they had trouble understanding the Phénix approach and that their request for vocational training as a LRP measure has disappeared.

#### 9.3.2 Other LRPs

- Lenders and IESC comments to the last version of the Kangneka and Parawi LRP were provided to CBG in April 2022 but the current status of this LRP is unknown as not specifically discussed during the visit. CBG took the decision to change the mining plan to avoid the Parawi plateau because of community speculative activities on the Plateau. CBG indicated that speculative crops and houses were discovered after consultations with the community to announce the coming economic displacement. From CBG understanding, some of the investors are not villagers from Parawi.
- During the December site visit, the Kagneka haul road under construction was visited in presence of the CBG mining and CBG Resettlement teams and the contractors: Henan Chine (construction) and BETEC (Technical consultant/Quality control). Coordination between the departments and contractors regarding social engagement seems effective.

- Plateau Mbourore is a new LRP in preparation. CBG indicated that the Land Disturbance Permit will not be available until the LRP is validated.

### 9.3.3. Recommendations regarding LRPs

The delayed implementation of the Kankalaré and Thiapikouré LRPs (now integrated in one LRP with Contingency blocks) and the potential lack of remaining agricultural land available expressed by the Paragogo Community (see Section 9.4 on cumulative impacts), once again raises (as already mentioned in the March 2022 report) the need to assess the requirement for renewed interim support (food assistance) to the PAP.

Consider developing, through another provider, an ambitious youth employability program in Sangarédi to: i) address the repeated request of youths for non-agricultural livelihood restoration activities; ii) contribute to the sustainable economic development of the area; and iii) mitigate the social risks associated with a youth exodus and/or high youth unemployment rate. For Benchmarking purposes, programs in Guinea (e.g. Bolloré Bluezone in Conakry) or of other mining companies (e.g. Anglo American ICT and Digital Skills training program with Google to increase employability around its operations in South Africa or Eramet COMILOG FabLab in Moanda, Gabon) can be studied.

Better coordination between the CBG Resettlement and Biodiversity team regarding LRP initiatives is recommended. For example: i) Phénix had planned a plant nursery whereas the Biodiversity team has already established several in impacted villages; and ii) market gardening intensification in some specific areas as part of the LRP should be in line with the orientation of the Landscape Management Plan.

It is also recommended that CBG should carefully assess the adequacy of Phénix's resources to assist 1,000 PAPs on an individual basis. The MUOA LRP Program design document from Phénix could not be reviewed as part of this report.

## 9.4 Exploration

### 9.4.1 South Cogon

Four blocks representing less than 10ha and less than 2ha impacted for Communities in the area north of the village of Mbouroré adjacent to the COBAD Road. At this stage, CBG is assessing the feasibility of mining, noting that the areas have an overburden (non-economical material above the bauxite).

### 9.4.2 North Cogon

An Environmental and Social Impact notice will be conducted for the future campaign. An agreement was found with the Communities for the installation of fly camps (fixed setting for the time of the campaign December to May). The temporary land take affects approximately 100 PAPs for this campaign.

## 9.5 Cumulative Impacts

The compensation register was not available for review by this monitoring report and thus an inability to report on the extent of the temporary and permanent land acquisitions from March 2022.

The IESC reiterates the need to identify and assess cumulative impacts on a number of communities. Since the ArcGIS is a system that is now operational (October 2022) and the village boundary survey has been implemented in a number of villages, CBG is able to make such an assessment, which will include detailed cartographies for each studied village. The recommendation has become a top priority given:

- The request from Fassaly Fouthabé to be relocated;
- The concerns expressed by Paragogo over the availability of remaining agricultural land;
- The mine plan map which shows some communities surrounded by mining activities (e.g. Kagnéka, Guéguéré);
- The forthcoming CAO mediation on land.

The IESC recommends making such an assessment on the communities that were listed as villages potentially affected by a physical resettlement by 2022 in the 2015 RPF, namely: Fassaly Fouthabé, Parawi, Guéguéré, Kagnéka, Horé Lafou, Sintiourou Kourawel, Kourawel Center, Parawol Aliou and Parago plus adding Mbouroré to this list.

In addition, it is recommended that this assessment be coordinated with the work currently undertaken by the Biodiversity team on the landscape management plan as they are exploring solutions for land acquisition-related consequences (e.g. the community in Kagnéka impinging on the forest because of reduced land availability) and for land rehabilitation, among other topics pertaining to Community Development.

Concerns were raised by the CBG team that generally limited availability of land in the area would be an issue if a new village resettlement was deemed necessary because of cumulative impacts. This situation emphasises another larger issue already raised in the March 2022 report: the footprint of CBG activities and the effort or otherwise made to minimise this footprint as per the PS1 requirement.

Until a clear assessment regarding the cumulative impacts of each of the mentioned villages can demonstrate to the contrary, the risk that livelihood restoration will not be possible for some communities is assessed as high with the consequence of community dependency on CBG for survival (through continuous food assistance), a multiplication of grievances and an increase in NGO adverse advocacy.

## 9.6 Grievances

Section 5.3 is dedicated to the grievance mechanism and this section will only address grievance management performance linked to land acquisition/PS5 (categorized under Resettlement in the CBG new grievance classification). According to CBG, grievances in 2022 (up to November 15<sup>th</sup>) totalled 52, compared to 12 in 2021, therefore a 300% increase. In the absence of a specific discussion on the subject with CBG, it is not possible to say if this significant increase is due to a better capture of grievances or to an increase in resettlement issues. The resettlement grievances include:

- 20% of grievances related to the LRPs (poor IGA program outcomes at Hamdallaye and Fassaly Fouthabé)
- 13% related to infrastructure
- 67% related to compensation, mainly the takeover of land during land stripping or impeded access to land (temporary limitation of access to the Kounsijdjère forest, close to Fassaly Fouthabé and old Hamdallaye). This recurrent problem of land takeover was already identified and solution attempted:
  - Better coordination with the mine department
  - Registration of such grievances as HSE incidents
  - Creation of a double cordon during land stripping operations to indicate clear limits of both the land strip and the stripped land deposit.

The impact of these measures, which appear to be appropriate, will have to be monitored in the next IESC report through the analysis of grievances.

42 out of the 52 registered grievances were not closed in November, which question the timely resolution of grievance. The grievance register was not provided to analyse the average and median time for grievance resolution. It is recommended that CBG adds an analysis of the median and average time of grievance resolution, per category, to monitor timely resolution and identify bottlenecks.

## 9.7 Monitoring

During the site visit, CBG informed the IESC that the recruitment of dedicated Monitoring and Evaluation staff was in the final stage, which was a repeated IESC recommendation. However, since this person has not yet taken up his/her position, the recommendations from the October 2021 VSV with respect to monitoring are therefore reiterated as follows:

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

## 9.8 Resettlement Implementation Capacity

CBG announced during the December 2022 visit the final stage of the recruitment of 11 additional staff members for the Social teams, including four for the resettlement team and two shared resources for the Community Relations and Resettlement teams:

- Two LRP advisors
- One compensation advisor
- One Monitoring and Evaluation advisor
- One Social Infrastructure engineer (shared resource)
- One GIS and database coordinator (shared resource)

In the organigram provided in the December 2022 visit, the Community Relations Manager remains in charge of the Resettlement team, with the support of the Resettlement Specialist. As noted in the March IESC Report, the "specialist" title is ambiguous, especially in respect of hierarchical responsibility. The current resettlement specialist is still an interim position with a contractual anniversary in December 2022, with CBG's recent efforts to find a permanent Resettlement Manager having failed.

The following contractors are supporting the CBG Resettlement team on a regular basis:

- SAMEC for inventories and surveys
- INSUCO for LRP development
- SIGMA for the geo-referencing of data

- CECI and Phénix for LRP implementation

In addition to outstanding earlier recommendations, the following new recommendations are made:

- seek better integration of the Resettlement and biodiversity teams. During the December visit, the lenders and CBG explored the idea of potential shared human resources between the two teams which could be a solution, in addition to regular meetings with both teams (e.g. every quarter).

**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>
Dec 2022 - 041	Hamdallaye Resettlement Site	Land tenure is not yet secured for Hamdallaye new village with consequences of: i) lack of land securitisation for the PAPs; ii) impossibility to conduct the final acceptance of the houses by the PAP iii) impossibility to transfer the management of the village to the Commune.	Operations	CBG has developed a way to address this issue. Complete the land tenure formalization and securitization process as per schedule agreed between the CBG Resettlement and Legal teams.	<b>Moderate</b>
Dec 2022_042	Fassaly Fouthabé	Fassaly Fouthabé has officially requested to be resettled	Operations	Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around Fassaly Fouthabé using ArcGIS, consult with the community and make a decision to respond to the request.	<b>High</b>
Dec 2022 – 043	Hamdallaye and Fassaly Fouthabé RAP – Livelihood Restoration	Current activities do not meet their intended objectives	Operations	<ul style="list-style-type: none"> <li>Acknowledge the reluctance of members to continue with the bakery, small ruminants and grasscutter (in Hamdallaye for the latter) and consult with Community to close these activities.</li> <li>Maintain market gardening and poultry activities but rethink model, and potentially finding a partner.</li> <li>Broaden the scope of livelihood restoration to more non-agricultural activities.</li> <li>Target the youth through employability and vocational training.</li> </ul>	<b>High</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
Dec 2022 - 044	Resettlement Policy Framework (RPF)	The updated Resettlement Policy Framework (RPF), including updated compensation matrix, has been pending validation for more than two years	Operations	<ul style="list-style-type: none"> <li>Follow process agreed during the IESC site visit: 1/ new CBG proposal for compensation of customary land acquisition 2/Lenders to review the remaining parts of the last version of the updated RPF 3/phone call between CBG, lenders and IESC to definitely validate the updated RPF</li> <li>Include RPF in the roadmap with RAP/LRP as action plans</li> </ul>	<b>High</b>
Dec 2022 - 045	Other LRPs	Thiapikouré, Kankalaré, Contingency blocks and MUOA LRPs have been contracted and are in a diagnosis/program design phase	Operations	<ul style="list-style-type: none"> <li>Consider complementary livelihood restoration activities specifically targeting youth (employability, vocational training)</li> <li>Ensure coordination between the LRP implementer and CBG biodiversity team</li> <li>Consider new transitional support to bridge the revenue gap until IGAs activities are operational</li> </ul>	<b>Moderate</b>
Dec 2022 - 046	Grievances	Land takeover during land stripping activities is accounting for a large number of grievances	Operations	Implement identified mitigation measures and monitor related grievance evolution	<b>Moderate</b>
Dec 2022 - 047	Cumulative impacts	Several communities appear to be surrounded by mining activities in current mine plan	Operations	<ul style="list-style-type: none"> <li>Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around the communities that were listed as villages potentially affected by a physical resettlement by 2022 in the 2015 RPF</li> <li>Conduct assessment in coordination with the Biodiversity team</li> <li>Minimize footprint as per IFC PS1 requirements</li> </ul>	<b>High</b>

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

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

### **10.1 Introduction**

The biodiversity component of the site visit was achieved through a series of meetings between the IESC biodiversity specialist and the CBG Biodiversity team on 6<sup>th</sup> and 9<sup>th</sup> December, as well as field visits in both Kamsar and the South-Cogon concession between 6<sup>th</sup> and 8<sup>th</sup> December. Key topics are discussed in Sections 10.2-10.6 with Section 10.7 providing the locations and site-specific information which informed this report.

### **10.2 Staffing and Equipment**

The attendees from the CBG Biodiversity team were:

- Biodiversity Manager;
- Botanical specialist;
- Faunal specialist;
- Rehabilitation specialist;
- Survey and inspection specialists.

As in previous visits, the team showed itself to be extremely knowledgeable on the key issues for the project with a good balance of specialisms. The biodiversity manager is to be commended on their efforts to support the Guinean team members to be seen as specialists in their own right, a growth from previous years when they fulfilled a more supporting role to that of the biodiversity manager through who all biodiversity matters were funnelled. It is understood that a formalisation of the team structure for the future is in progress to ensure clear roles and responsibilities are confirmed including how the team reports to the CBG HSE department, along with how external contractors report to the team. The team would also benefit from additional training from external experts to expand its knowledge and potential visits to other similar projects in Africa with similar issues (the Landscape Plan suggests projects in Madagascar, where the biodiversity manager has experience as being a potential option).

It was noted by the IESC biodiversity specialist that the team could benefit from some improved field equipment with the team very interested in the capabilities of the infield GIS capture used by the IESC during the site visit to capture information and photos at each visit locations. It is certainly something which could be used to improve in field data capture at a very low cost as it is simple smartphone app-based technology. The team's office within the concession area is also extremely basic. With the importance of the rehabilitation and the likely increased demands on the team from North Cogon activities when they proceed. A previous CBG presentation to the IESC and lenders indicated that North Cogon is more sparsely inhabited with poor roads in many areas and CBG should ensure that the team has all it needs to complete its activities safely and efficiently and this may include investments in e.g. new vehicles.

### **10.3 Biodiversity Inspections**

To monitor the compliance of CBG operations (including the MUOA Project and investigations in the North Cogon concession), and the management of biodiversity issues arising from the activities of SMB-W and COBAD (in the South Cogon concession), the CBG Biodiversity team continues to undertake regular inspections following a clear schedule of two inspections per week in CBG activity areas and once per month for SMB-W and COBAD areas within the South Cogon concession. The

new CBG SharePoint site is being well used in this regard with the inspection schedule, reports, photos and other materials all now stored in a clear and easily accessible way.

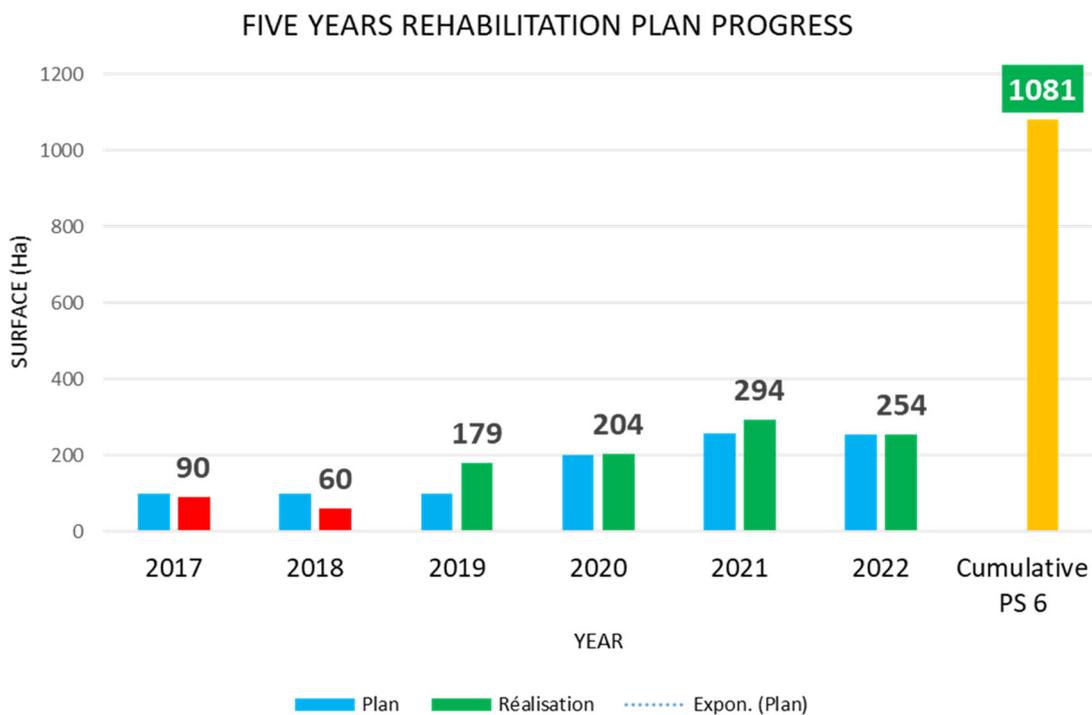
With the previously reported addition of two short term contract inspection specialists supporting the full-time team member, there is now sufficient resource to complete the schedule effectively. In order to continue to deliver the inspections successfully, those two short-term positions should be made permanent positions in 2023.

The scope of the biodiversity inspections remains consistent for all visits and regardless of an inspection team’s composition however, upon review of the inspections completed in 2022, it became clear that most inspections are only undertaken by a member of the biodiversity team. Whilst the majority of the inspection requirements fall within their specialism and the IESC did not identify any deficiencies in the inspections completed, there would certainly be benefit from the biodiversity specialists being joined as appropriate by specialists from other teams.

Overall, the IESC is satisfied that there continues to be a clear, well-organised programme for completion of inspections of CBG’s operations and SMB-W/COBAD activities and there is good progress in closing out the actions raised.

**10.4 Rehabilitation**

Good progress continues to be made in efforts to rehabilitate areas released to the biodiversity team post-mining. As shown in Figure 10-1, the milestone of 1000 ha of rehabilitated land was passed in 2022 and the yearly target for rehabilitation of 254 ha was also reached. The team has continued with the new approach of only applying topsoil patchily in order to more closely mirror the natural conditions of a bowal grassland. The approach also helps to protect young tree planting by preventing natural or man-made fires from reaching them in the early years post-rehabilitation when fire would kill young trees as has happened elsewhere. The biodiversity team indicated that five years of tree growth is typically sufficient to allow replanted trees to survive grassland burning in their vicinity.



**Figure 10-1 Rehabilitation Progress since 2017**

From discussion with the biodiversity and social specialists and the areas seen on the site visit, there are two keys to a successful rehabilitation programme, but both are challenging. Firstly, larger, continuous areas of land ready to be rehabilitated should be released. At the moment, the rehabilitation areas are generally small and scattered. The IESC recognises that the CBG approach, where multiple plateaux must be open simultaneously to allow blending of ore, makes this more challenging, but it remains an objective to be reached wherever possible.

Secondly, in order to avoid potential conflicts between the needs of the community to farm the land and CBG's attempts to undertake rehabilitation for biodiversity, sufficient land should be rehabilitated that a distinction in initial usage is possible. This relates to the need for planted trees to reach at least five years old before the land is returned to the traditional slash and burn agriculture approach.

One suggestion by the team, which the IESC supports would be for more grassland only rehabilitation areas on locations agreed with the community. This would allow tree planting to be focussed on areas where it is agreed that farming will not be started in the short term.

Another possibility to be considered would be for grassland rehabilitation on areas not ready for "full" rehabilitation with trees. These may include areas which CBG believes may be mined in future, but in the short term could be used for livestock grazing. This would reduce pressure on the areas of rehabilitation where time and money has been spent trying to restore woodland habitats, only for the trees to be killed before establishing. The IESC recommends that the biodiversity team pursues these possibilities with colleagues in the mining department.

As part of the rehabilitation process, five nurseries have been established within the concession area. During the visit, three were visited – those at Sangarédi, Kourakoto and Boulléré. The nurseries are at varying stages of development with the Sangarédi nursery a largely self-sufficient business "Soremine" which sells trees raised there, including to the neighbouring operator GAC when it was short of trees for one of its restoration areas. The Boulléré nursery is not as far progressed and remains supported by CBG, but grows a mixture of crop trees and trees to be used in rehabilitation. The Kourakoto nursery's specific focus is the raising of trees for gallery forest rehabilitation. It was reported that the community collects seeds from the forest to sell to the nurseries for future rounds of planting. These are excellent examples of working with the local communities for both community and biodiversity benefit, crucial to the success of the Integrated Landscape Management Plan discussed in Section 10.6.

The site visit included areas of older rehabilitation in the north-east of the concession where previously mined areas have been returned to full forest with a close to natural stratification of vegetation from ground layer up to tall trees. Green monkeys, mongooses, squirrels and a wide variety of birds species seen by the IESC and during the visit to those areas are testament to the success of the rehabilitation. It is notable that the habitat has developed within only a few decades and shows what is possible, hence its description as the benchmark for rehabilitation by the biodiversity team.

Finally on the topic of rehabilitation, the two mangrove restoration areas in Kamsar were visited. Both were seen to be progressing well. The biodiversity team's continual learning by doing was again in evidence. It has become clear that likely due to nitrogen fixation in the soil, mangroves planted closest to existing mangrove trees do better than those further away. As such, the approach going forward is to ensure mangrove planting reflects that fact with progressive rehabilitation out from existing areas. Rio Tinto has approached CBG for advice on mangrove rehabilitation in relation to the Simandou project, as the Kamsar mangrove restoration has been so successful.

### **10.5 Biodiversity Action Plan (ESAP Item 26)**

An update was given on progress to develop the documents required to support the Biodiversity Action Plan (BAP) by The Biodiversity Consultancy (TBC), the consultants appointed by CBG to undertake the work. This followed on from an update call with CBG, TBC, the IESC and IFC biodiversity specialists on 8<sup>th</sup> November 2022 outlining progress on development of the Biodiversity Monitoring and Evaluation Plan (BMEP) which is the next step in the BAP process.

The biodiversity team talked the IESC through the approach to in house and external monitoring to inform the BMEP and the proposed indicators to inform the BMEP which are logical and pragmatic. Whilst on site, the IESC met with the specialist consultants undertaking monitoring of chimpanzees and primates and those undertaking fish and water quality monitoring. The specialists were knowledgeable and helpful and the methods they were seen to be employing were appropriate for the requirements.

Prior to the site visit, CBG provided all of the monitoring reports for the concession. The BMEP was issued to the IESC and lenders for review following the site visit. A workshop to discuss the BMEP and No Net Loss/Net Gain Tracker is proposed for early 2023.

### **10.6 Integrated Landscape Management Plan (ESAP Item 28)**

A mid-term report on progress in developing the Integrated Landscape Management Plan was provided to the IESC and lenders in October 2022 and following an initial review prior to the site visit, the IESC biodiversity specialist and the CBG Biodiversity Team focussed much of the site visit on locations relevant to the proposed activities of the plan, i.e. locations where the consideration of competing pressures of mining, biodiversity and communities requires a holistic approach. The discussion of rehabilitation pressures in Section 10.4 highlights one of the key issues on the landscape scale – there is only a finite amount of land available within the concession and how land is rehabilitated, what proposed end use there is for it and where it is within the concession are currently not decided in a way which considers all interested parties.

During the site visit, some key trends identified within the Integrated Landscape management Plan Mid-term report were seen. Of these, the most notable was that usage of the landscape by communities is focussed on the land above the gallery forest but below the very tops of hills. As such it is in those two areas where the majority of higher quality habitats remain and could be protected with limited impact on community requirements. This does however mean that the areas used by communities for agriculture are typically the bauxitic plateaux planned for mining and the potential conflict with biodiversity is that for landscape scale conservation of species such as chimpanzee, connections between the gallery forest and the retained forest on the hill tops are required. As described in Section 10.4, it does not take long for tree rehabilitation within mined areas on plateaux to develop into forest suitable for usage by larger species.

The need for the implementation of a landscape level approach was made clear during a visit to the Forest of Lougal. It is a small stand of high-quality gallery forest on the edge of the as yet unmined Kagneka plateau and according to the experts undertaking monitoring of the chimpanzees for CBG, one of the most important locations for the species within the southern part of the concession and therefore key to CBG's efforts to deliver biodiversity net gain for the species. However, the local community has identified the forest as an area required to be felled for wood and subsequently turned to farmland. Identification of suitable alternative land for the community to use and thereby protect the forest may be possible, however once the Kagneka plateau is under active mining, pressure on areas such as the Forest of Lougal will intensify. It has been shown on other projects that imposing conservation measures on communities by simply identifying such areas as protected and not to be used would likely fail. Only through an approach involving all of the CBG specialist teams, can those teams be successful in

implementing their obligations and address potential future conflicts and risks relating to increasing pressure on land use.

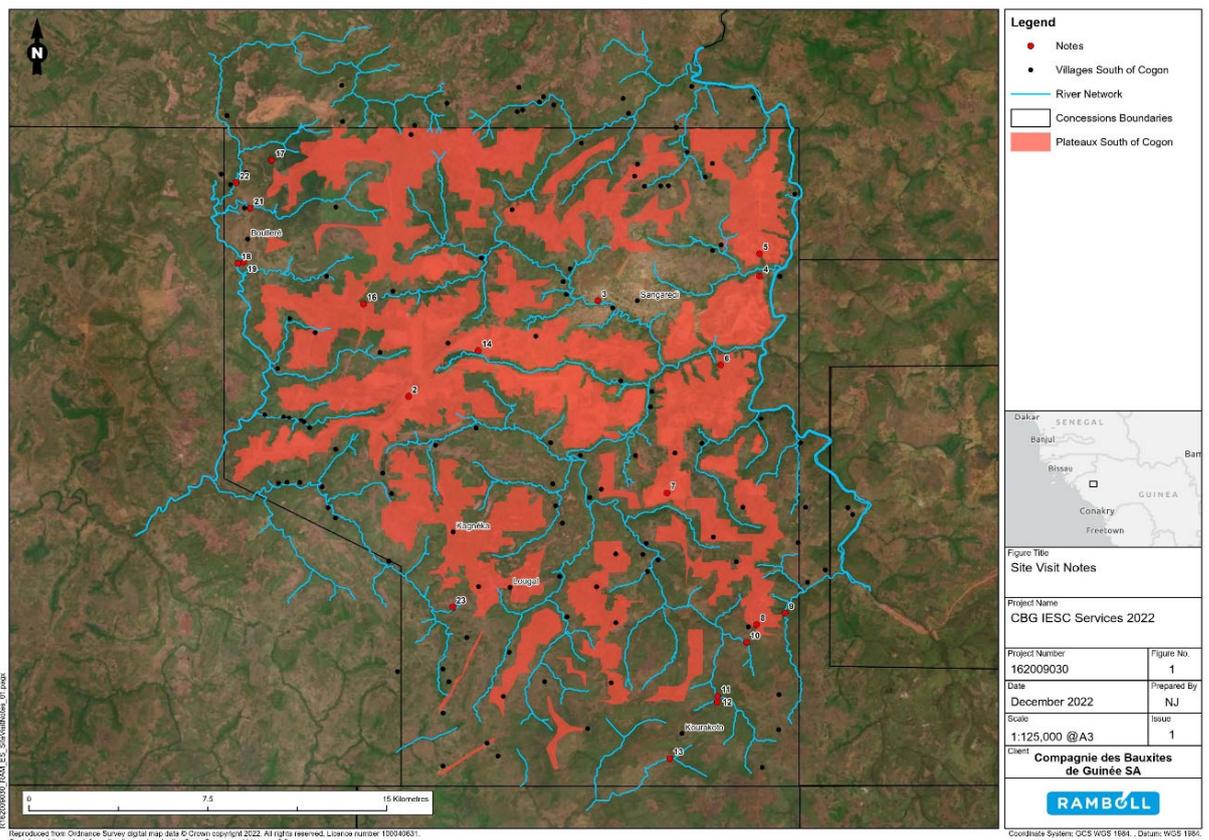
Therein lies one of the main challenges to the success of the plan, as it requires close collaboration between the Biodiversity Team, the Social/Community Relations team and the CBG Mining Department and cuts across many existing approaches and plans within the CBG ESMS.

It also seems that the process of agreeing the plan will involve many external stakeholders which is likely to take some time. How activities needing to occur on site now proceed before the final plan is implemented is also a key consideration.

Subsequent to the visit, the IESC and lenders comments on the Integrated Landscape Management Plan Mid-Term Report were provided to CBG in January and comments on the Final Plan are at the time of this report being prepared and will be provided to CBG at the earliest opportunity.

**10.7 Site Visit**

Figure 10.2 shows the location of points visited during the site visit. The information gathered at each location informed the preceding sections with Table 10.1 providing photographs of the locations and location specific information.



**Figure 10-2: Locations Visited within the South Cogan Concession between 6<sup>th</sup>-9<sup>th</sup> December**

Location <sup>26</sup>	Photograph	Details
1: Kamsar		<p>42 ha of mangrove rehabilitation completed successfully to protect shoreline from erosion. Photo shows how mangroves planted closer to existing trees grow faster and stronger.</p>
2: Dangara		<p>Pockets of topsoil reinstated rather than full area. Trees growing well in chicken manure without topsoil. Approach prevents burning of young trees from natural and man-made fires as seen across concession during visit and in background of photo.</p>
3: Sangarédi		<p>Sangarédi nursery run by Soremine. Very well run location with knowledgeable staff. Nursery buys seeds from community which collects them as an additional income. Trees sold to CBG and also other operators.</p>

<sup>26</sup> Location 1 is in Kamsar and not shown on the Figure. Locations 15 and 20 not included as they were markers on non-biodiversity features.

Location <sup>26</sup>	Photograph	Details
<p>4: West of Cogon Bembeya</p>		<p>2000 rehabilitation which has reached size, species diversity and quality suitable for use by primates and other mammals</p>
<p>5: near Ndanta Fongne</p>		<p>2019 rehabilitation progressing extremely well – already approximately 3m tall. Within 2 more years trees will be tall enough to withstand some burning in the area</p>
<p>6: East of Daroul</p>		<p>2000 Benchmark rehabilitation with mature trees. Some selective charcoal production. Example of location requiring management to be retained but with sustainable community usage.</p>

Location <sup>26</sup>	Photograph	Details
7: Southeast of Kare Dabbhel		<p>2020 rehabilitation on one of the larger area of land released. No topsoil, trees establishing extremely well. Example of an area where it would be possible to create areas of grassland only rehabilitation in neighbouring areas in future.</p>
8: East of Gaidhe Djeli		<p>Apparently abandoned SMB camp. There is a question of whether it will be rehabilitated by SMB or left in situ, noting that CBG doesn't have responsibility for such SMB-W impacts or actions but uses its best efforts to influence SMB-W rehabilitation activities.</p>
9: Northeast of Gaidhe Djeli		<p>Location of SMB-W railway entering tunnel. Railway has severed one of the highest quality areas of gallery forest within the concession. SMB-W tunnel guard reported seeing chimpanzees regularly to the south. Railway now prevents movement north.</p>

Location <sup>26</sup>	Photograph	Details
<p>10: South of Gaidhe Djeli</p>		<p>Other end of SMB-W railway tunnel at location 9. Again, high quality gallery forest has been severed. Culvert installed retains hydrological connectivity but would not be used by chimpanzees known in area. Discussion of how connectivity could be reinstated –rope bridges over railway was one point discussed.</p>
<p>11: Northeast of Kourakoto</p>		<p>Third example of SMB-W railway having severed high quality gallery forest where rare amphibian and reptile species and chimpanzees known to occur.</p>
<p>12: Kourakoto nursey</p>		<p>Well run community nursery – a start up business established by CBG. Growing trees for gallery forest rehabilitation. Site of excellent discussion with biodiversity team on the importance of such endeavours for the success of the Landscape Management Plan.</p>

Location <sup>26</sup>	Photograph	Details
<p>13: South of Kourakoto</p>		<p>Fourth location visited where SMB-W railway has severed high quality gallery forest. Chimpanzees previously present but not recorded since railway construction. Another potential key location for installation of a connection such as a rope bridge. Some construction debris left by SBM-W but not much.</p>
<p>14: Dangara</p>		<p>Example of buffer zone around gallery forest as imposed by plateau by plateau LDP process. However, although the forest itself is protected, activity has reduced its suitability for fauna. A location where rehabilitation should consider reconnecting retained forest with other areas of forest.</p>
<p>16: Southeast of Mbourore</p>		<p>Forest on Boulléré plateau that owner wants to be retained as he believes it protects his water supply. Older evidence of chimpanzee nests. Owner is concerned that he won't be compensated by CBG if it were not felled as part of mining. Another example where biodiversity, mining and community teams must collaborate to reach best outcome for competing interests.</p>

Location <sup>26</sup>	Photograph	Details
<p>17: East of Boulléré</p>		<p>View northward towards convergence of CBG, GAC and COBAD concessions where currently good forest cover exists. Different approach to mining in other concessions has allowed development of mature forest. As in other areas, tops of hills are not farmed, slopes below are where agriculture is focussed. Another area where landscape level decisions on activity should be made.</p>
<p>18: South of Boulléré</p>		<p>Old bridge over river as part of now rehabilitated COBAD road through area. Still in use by pedestrians. Although unsightly, current situation is better for biodiversity than a full bridge. However, for community reasons, a small crossing not suitable for vehicles might be preferable and the removal of the current structure could be beneficial for biodiversity in the longer term</p>
<p>19: South of Boullere</p>		<p>Excellent rehabilitation of old COBAD road has reduced its width to only just wide enough for one vehicle. A mixture of agricultural and natural forest trees along with vetiver grass has been successful. There is community use of the trees for crops and fuel.</p>

Location <sup>26</sup>	Photograph	Details
21: North of Boulléré		<p>External specialist monitoring of water quality and fish species as part of BAP/BMEP activities.</p>
22: Boulléré Nursery		<p>Boulléré community nursery. Another well run facility with currently salaried staff but will be self-sufficient business in future. Trees being grown for both community and forest rehabilitation uses, with community trees distributed to all community members.</p>
23: Forest of Lougal		<p>Recent chimpanzee nest within extremely high-quality gallery forest still connected to wider landscape. Area of high activity for the species, but potentially to be felled by community. Future mining of Kagneka plateau will increase pressure on such areas.</p>

Table 10-2: Summary of Summary of PS6 Findings

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
Dec 2022_048	Inspection	The construction of the SMB-W railway has adversely impacted on high quality gallery forest in multiple locations. Whilst the construction included culverts to maintain hydrological connectivity, movement by faunal species is greatly reduced or prevented.	Operation	Although the responsibility for mitigating SMB-W impacts does not sit with CBG, it should attempt to reconnect the areas where possible. Potential interventions include rehabilitation of forest habitats as close as possible to railway either side of tracks, installation of rope bridges or similar for movement of chimpanzees and primates. The next update to the BAP provides the opportunity for CBG to consider the feasibility of these actions to deliver on site actions which could be key to CBG's requirement to deliver net gain for species.	<b>Moderate</b>
Dec 2022_049	Rehabilitation	Rehabilitation work by the biodiversity team is of a high standard and is proving to be extremely successful. However, the areas available for rehabilitation are generally small and scattered across the concession. Competing pressures on the rehabilitated areas are keenly felt with communities wanting to use them as soon as possible but often too soon for planted trees to withstand burning.	Rehabilitation	As far as possible within the confines of mining, and the IESC recognises that the required CBG approach can make this challenging, larger, continuous area should be released for rehabilitation. Decisions at a landscape scale should be made on the proposed end use of each rehabilitation area, even if that is for shorter term grassland areas where future mining may occur. CBG should develop a joint assessment between the biodiversity team and the mining team to identify potential locations and options for releasing such areas to be discussed during the next site visit.	<b>Moderate</b>
Dec 2022_050	Integrated Landscape Management Plan	Competing pressures and potential impacts on locations such as the Forest of Lougal demonstrate the importance of progression with the plan as quickly as possible. At present, there is a genuine risk that the competing requirements of the various specialist teams to deliver their obligations are not compatible given the finite amount of land available. The issues are known to the various specialist teams in CBG	Operation and Rehabilitation	IESC and lender comments are being provided concurrently with preparation with this report to reflect observations and discussions during the site visit. CBG should use those comments to finalise the Integrated Landscape Management Plan and identify where it will sit within the hierarchy of the CBG ESMS. High level support from CBG management must be given to ensuring that the CBG specialist teams are supported to work together on the activities of the Integrated Landscape Management Plan in order to avoid the missed opportunity of collaborative working. The IESC will look for evidence of that	<b>Moderate</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendation</b>	<b>Significance</b>
		which all work hard to address them, and this plan should draw those efforts together.		collaborative working on this critically important plan during the next site visit.	
Dec 2022_051	Integrated Landscape Management Plan	Given the importance of this plan to the success of biodiversity and community measures in the South Cogon concession, further training of the Biodiversity team would be beneficial	Operation and Rehabilitation	As set out in the Integrated Landscape Management Plan, additional training of the team, including potential visits to projects elsewhere addressing similar issues through a landscape level approach, would be beneficial.	<b>Moderate</b>

## 11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

During the December 2022 site visit, CBG provided the IESC with an update on Cultural Heritage Management whose implementation is observed aligned with the relative action plan. The planned 26 actions have been classified as completed (58%) or ongoing (42%).

An annual monitoring report for the CHMP, Action Plan and KPIs is planned to be prepared in Q1-2023.

Based on available information, 50 consultation and awareness-raising meetings on cultural heritage management were held in the villages of the mine and North Cogon as follows:

- 24 meetings in the rural commune of Sangarédi (Boké prefecture): Boullèrè, N'Dantafonyè, Kagnaka, Sinthiourou Kaou Ouri Bowè, Lafou M'Baïla, Hafia, Sinthiourou Lafou, Bourorè, Cogon Lingue, Paragogo, Fassaly Foutabhè, Sinthiourou lafou, N'Dantawi, Guéguèrè, Telibofi, Samayabhè, Diarindé missidé, Diarindé roundé, Kalinko Ley, Horè Lafou, Louggal, Kagnaka, Parawi, Bandodji Touguidjé.
- 08 meetings in the rural commune of Daramagnaki (Télimélé prefecture): Missira, Karèdabhèl, Diandian Missidé, Ndantari Timbi, Madinadian, Poora rail, Bourety.
- 16 meetings in the rural commune of Wendou M'Bour (Gaoual prefecture) as part of consultations for prospecting in North Cogon (plateaux 22 and 23): N'Dalao, Djoloun Sadjo, Kindendji, Thièwè, Kouramangui, Maouba Mangodjè, Fèssè, Féfinè Dantari, Demouroudji, Karimou, Fefinè, Galandou, Petoun Djiga, Dourourè, Thiaguiedi, Fartahoun, Kolori.
- 2 community consultation frameworks were organised in Sangarédi and Daramagnaki.

8 meetings have been organized as part of the cultural heritage induction with CBG personnel and subcontractors: 7 at the mine and 1 covering the rail.

Furthermore, 75 sites out of the 542 listed in the ESIA have been visited and the data updated in the cultural heritage site monitoring register.

One grievance pertaining to Cultural heritage has been received from the community of Boundouwandé concerning the proximity of mining operations to the Berdhè Diama site on the N'Dangara plateau. CBG has placed a cordon to demarcate and make it visible. The IESC understands the grievance is now closed.

No observation on cultural heritage were made during the December 2022 site visit.

## **APPENDIX 1 SITE VISIT ITINERARY**

**CBG Site Visit, week commencing 5<sup>th</sup> December 2022**

**Day 1. Monday 5th December**

Time slot	Environment	H&S	Social (excluding resettlement)	Resettlement	Biodiversity
0600 – 1300	Travel from Conakry to Kamsar				
13.00 - 1400	COVID tests in Kamsar				
14.00-17.00	<ul style="list-style-type: none"> <li>- Introductions</li> <li>- Project status update including                             <ul style="list-style-type: none"> <li>o Latest on mine plan and recent LDPs (South of Cogon).</li> <li>o MUOA progress update (include new loco workshop and land required for new signalling)</li> <li>o Presentation ESAP#1 – the Road Map</li> </ul> </li> <li>- Language of documentation (tbc)</li> <li>- Other</li> </ul>				

**Day 2. Tuesday 6<sup>th</sup> December**

Time slot	Environmental	H&S	Social	Resettlement	Biodiversity
0800 - 1030	<p>Kamsar (field)</p> <ul style="list-style-type: none"> <li>- Inspection of Tora Bora waste facility</li> <li>- Tour of oily water effluent network and OWS (to see corrective works undertaken)</li> <li>- Construction of MUOA workshop</li> <li>- AQ monitoring station (Kamsar)</li> </ul> <p>Walkover inspections conducted by Chris (Env) and Vincent (H&amp;S). Will include inspection of safety measures, discussions with contractors, for example those constructing new MUOA workshop</p>		<p>Kamsar (Office)</p> <p>Human resources, equipment and training:</p> <ul style="list-style-type: none"> <li>- Community Relations Team                             <ul style="list-style-type: none"> <li>-staffing resources</li> <li>- other resources</li> </ul> </li> <li>- training</li> </ul>	<p>Appointment of new Resettlement Manager (status update)</p> <p>CRPF – discussion on latest draft (revised version due 30/11)</p> <p>CBG plans for future mining/exploration of areas including discussion around New pilot areas (as per notification on 20/October). Presentation of ArcGIS</p> <p>Grievances (resettlement related)</p>	<p>Office sessions (prioritized list):</p> <ul style="list-style-type: none"> <li>- General update: overall progress, staffing, resourcing</li> <li>- Biodiversity Inspections:                             <ul style="list-style-type: none"> <li>- Examples of inspections completed</li> <li>- Review of inspection register</li> <li>- Non-conformities</li> <li>- SMB + COBAD</li> </ul> </li> </ul> <p>Reinstatement Progress/progress against targets.</p>
10.30 – 12.30	Continuation of above		<p>Stakeholder engagement: update on the engagement activities</p> <ul style="list-style-type: none"> <li>- stakeholders engaged, frequency, topics and methods of engagement, feedback and how this has been addressed</li> <li>- update on efforts to promote the participation of women and vulnerable groups</li> </ul>	<p>Status updates for each of the existing/draft RAPs/LRPs in turn</p> <ul style="list-style-type: none"> <li>- Hamdallaye and FF RAP (implementation of IESC March 2022 recommendations)</li> <li>- Kankalaré</li> <li>- Thiapikouré</li> </ul>	<p>Visit to Mangrove restoration areas in Kamsar</p> <p>Area outside of the Port site perimeter fence adjacent to old OWS (mangrove area)</p>

			<ul style="list-style-type: none"> <li>- management of interactions and relations between external stakeholders and CBG contractors</li> <li>- monitoring of engagement activities through KPIs</li> <li>- reporting of engagement activities (internally / externally)</li> <li>- key issues / challenges faced</li> </ul>	<ul style="list-style-type: none"> <li>- Contingency block</li> <li>- Plateau (Parawi/ Ndangara/Kagneka) LRPs</li> </ul> <p>MUOA related displacement – new implementation partner (Phénix)</p> <p>Resourcing and monitoring function</p>	<p>affected of the oil release pre COVID)</p> <p>Any other locations worth viewing as determined by CBG biodiversity team, perhaps the port itself or other coastal location.</p>
12.30-13.30	Lunch				
13.30-14.30	<p>Kamsar office</p> <ul style="list-style-type: none"> <li>- H&amp;S Organization and Resourcing (new recruits)</li> <li>- 2021 H&amp;S performance (key monitoring programs, key metrics)</li> <li>- Presentation on H&amp;S management (identified key / material issues).</li> <li>- Findings and actions from the ALCOA delegation visit. Initiatives/progress against action plans</li> <li>- Contractor management</li> </ul>	<p>Kamsar office</p> <p>Grievance management and doleances.</p> <ul style="list-style-type: none"> <li>- update on the status of grievances since the previous site visit</li> <li>- effectiveness of the grievance mechanism (use of GM and resolution timeframes),</li> <li>- efforts to raise awareness about and encourage the use of the grievance mechanism</li> <li>- grievance management and reporting</li> <li>- update on the status of doleances</li> </ul>	<p>Travel (with implementation partner) to Sangarédi stopping at locations along the MUOA to observe actions associated with implementation of MUOA LRP</p>	<p>Travel to Sangarédi.</p>	
14.30 – 17.30	<p>Kamsar (Office)</p> <p>Water Management discussions</p> <ul style="list-style-type: none"> <li>- Implementation of WMP</li> </ul>	<p>Kamsar Office</p> <ol style="list-style-type: none"> <li>1. Incident investigation methodology/reporting.</li> <li>2. Implementation of Alcoa corrective action plan.</li> </ol>	<p>Cultural heritage.</p> <p>Update on the implementation of the CHMP and reporting on KPIs, including;</p> <ul style="list-style-type: none"> <li>- any cultural heritage-related complaints and incidents</li> <li>- monitoring</li> </ul>	<p>As above</p> <p>Overnight Sangarédi</p>	<p>As above</p> <p>Overnight Sangarédi</p>

	<ul style="list-style-type: none"><li>- Monitoring programme and results</li><li>- Impacts on communities</li><li>- OWS</li></ul>	<ol style="list-style-type: none"><li>3. Improvements/initiatives re safety culture</li><li>4. Asset maintenance</li></ol>			
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**Day 3. Wednesday 7th December**

Time slot	Env	H&S	Social (incl)	Resettlement	Biodiversity
All day	<p>Sangarédi</p> <p>Travel to mine area to visit areas and communities where project has potential to impact water quality.</p> <ul style="list-style-type: none"> <li>- Meet communities</li> <li>- Water resources</li> </ul> <p>Inspect contractors' facilities, including facilities provided to security contractors.</p> <p>Overnight Sangarédi</p>	<p>Sangarédi</p> <p>Inspection of Sangarédi offices and workshops areas</p> <p>Travel to mine area to visit active mine site and haul roads to inspect working conditions and safety measures, discussions with contractors. Also equipment and plant maintenance processes, Risk Management and Control of Work.</p> <p>Overnight in Sangarédi</p>	<p>Travel to mine area to visit areas and communities where project has potential to impact water quality.</p> <ul style="list-style-type: none"> <li>- Meet communities</li> <li>-</li> <li>- Water resources</li> </ul> <p>Overnight in Sangarédi</p>	<ul style="list-style-type: none"> <li>- Visit to Hamdallaye resettlement site</li> <li>- Visit to Fassaly Fouthabé–community meeting in Fassaly Fouthabé, including meetings with GIEs</li> </ul> <p>Overnight Sangarédi</p>	<p>Visits to North part of the South of Cogon Concession</p> <p>(Nurseries, COBAD, former COBAD road, COBAD road river crossing visited during previous visits and in March visit report to consider options.</p> <p>BMEP Monitoring location in Boullère, the situation of the former pristine Lougal forest, Rehabilitation in the South ...)</p> <p>Freshwater habitat BMEP monitoring location</p> <p>Overnight Sangredi</p>

**Day 4. Thursday 8th December**

Time slot	Env	H&S TEAMS Room 2	Social	Resettlement	Biodiversity
07.30 – 10.30	Return to Kamsar first light  Stopping at locations along RoW (tbc)	Return to Kamsar first light  Stopping at locations along RoW (tbc)	Return to Kamsar first light  Stopping at locations along RoW for appreciation purposes and observation of community safety measures.  Visit to the Primary School in Sossoya	- Kankalaré, Thiapikouré and Contigency blocks implementation of LRP actions/meetings with PAPs in Paragogo and implementation partner  - implementation partners  Visit to Kagneka haul road in construction	Visit to southern part of South Cogon concession to visit key locations for Integrated Landscape Management Plan Area – CBG bio team to advise on what can be seen.  Visit older rehabilitation reference sites, new rehabilitation since 2019 and topsoil discussion mining dynamic and rehabilitation, SMB and landscape management challenge  Other BMEP monitoring locations
10.30 – 12.00	Status/implementation of management plans (in order of priority)  Management of Change (MoC) – progress since previous visit.  Waste management (scope of the new consultancy)	Deep dive H&S discussion with H&S team (CBG and contractors' representatives)  Review of H&S MS elements - Adequacy of OHS documentation (policies, manuals, SOPs, plans)	Kamsar Office Community health and safety, including: - implementation of CHSMP and reporting on KPIs - blasting activities, incl implementation of the Blasting Agreement - communicable disease prevention efforts (mosquito	As above	As above

		<ul style="list-style-type: none"> <li>- Incident investigation and root cause analysis</li> <li>- Resourcing levels</li> <li>- Commitment of Senior Management/decision-makers</li> <li>- Training and competency management for CBG employees and contractors</li> <li>- Contractor management including H&amp;S contractual obligations placed on contractors.</li> <li>- H&amp;S Communication and workforce engagement including with contractors.</li> </ul>	<p>nets, collaborations, national malaria programme, survey and baseline data gathering</p> <ul style="list-style-type: none"> <li>- HIV and AIDS (plans for 2023)</li> <li>- rail-related community health and safety (implementation of RRSMP)</li> <li>- (incidents/near misses</li> <li>- the <i>hommes piquet</i> (including training, distribution and equipping of flagmen)</li> <li>- ongoing community awareness raising and provisions for potentially vulnerable groups,</li> <li>- next steps / key priorities</li> </ul>		
<p>13.00 – 15.00</p>	<p>AQMP</p> <ul style="list-style-type: none"> <li>- Stack emissions</li> <li>- P Kirby Modelling report (with support from Ramboll office based staff)</li> <li>- Dust suppression (Kamsar and Sangarédi)</li> </ul>	<ul style="list-style-type: none"> <li>- Improvement of safety culture</li> <li>- Management of operational safety risks for both controlled and monitored activities (Efficiency of the existing H&amp;S system)</li> <li>- H&amp;S Assurance Processes and management reviews</li> </ul>	<p>Kamsar Office Community health and safety, including:</p> <ul style="list-style-type: none"> <li>- implementation of CHSMP and reporting on KPIs</li> <li>- blasting activities, incl implementation of the Blasting Agreement</li> <li>- communicable disease prevention efforts (mosquito nets, collaborations, national malaria programme, survey and baseline data gathering</li> <li>- HIV and AIDS (plans for 2023)</li> <li>- rail-related community health and safety (implementation of RRSMP)</li> <li>- (incidents/near misses</li> </ul>	<p>Meeting with the resettlement team at the Community relations building in Sangarédi to review questions related to Hamdallaye and Fassaly Fouthabé RAP</p>	<p>Continuation of above</p>

			<ul style="list-style-type: none"> <li>- the <i>hommes piquet</i> (including training, distribution and equipping of flagmen)</li> <li>- ongoing community awareness raising and provisions for potentially vulnerable groups, next steps / key priorities.</li> </ul>		
1500	<p>Noise and Vibration (including blasting)</p> <p>Dredging – 2022 campaign</p>	<ul style="list-style-type: none"> <li>- HSE performance data (including discussion around 2021 fatalities)</li> <li>- Corrective Action Tracker</li> <li>- Challenges faced by CBG</li> <li>- Asset maintenance</li> </ul>	<p>Kamsar Office session, Community Development Plan:</p> <ul style="list-style-type: none"> <li>- progress with implementation (investments made / activities undertaken/ the communities targeted/ initial observations)</li> <li>- current efforts to collaborate / coordinate with other CBG teams (e.g. resettlement, biodiversity) as well as other actors in the region and implementation partners</li> <li>- update on monitoring and evaluation, including study that was proposed in 2022 to gather key data / establish a baseline for monitoring the outcomes of CBG’s community development efforts</li> </ul>	Return to Kamsar	Return to Kamsar

**Day 5. Friday 9<sup>th</sup> December (Kamsar)**

Time slot	Env	H&S	Social	Resettlement	Biodiversity
08.00 – 11.00	<p>ESAP discussion</p> <p>Wrap up meetings (as necessary)</p> <p>Close out of legacy IESC findings</p>	<p>Wrap up meetings (as necessary)</p> <p>Close out of legacy IESC findings</p>	<p>ESAP discussion – outstanding items for social include the SEP (2022 to 2025), the stand-alone Grievance Mechanism, the management of social data (i.e. IsoMetrix), the CDP, the IMP and the community mobility and livelihoods study (including community requests for additional footbridge crossings/level crossings).</p> <p>Close out of legacy IESC findings</p>	<p>ESAP discussion</p> <p>Wrap up meetings (as necessary)</p> <p>Close out of legacy IESC findings</p>	<p>ESAP discussion</p> <p>Wrap up meetings (as necessary)</p> <p>Close out of legacy IESC findings</p>
Lunch					
14.00 – 16.00	<p>Close-out meeting</p> <p>Stay for follow up discussions with CBG/Lenders</p>				

## **APPENDIX 2 PHOTOLOG**



**Photo 1.** Covered dome at Tora Bora providing shelter from the weather



**Photo 2.** Experimental bricks manufactured using recycled plastic

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 3.** Unsealed oil containing drums at the temporary hazardous waste storage facility, Kamsar



**Photo 4.** Contaminated soils stored within a poorly ventilated shipping container

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 5.** Miscellaneous waste electricals/combustibles stored in shipping container. Vehicle batteries with exposed terminals present fire risk



**Photo 6.** Visible dust plume from stack serving dryers 1 to 3

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 7.** Damaged secondary containment resulting in unstable storage of corroding drums (site adjacent to the old oil waster separator)



**Photo 8.** Loss of containment from oil containing free oil resulting in soil contamination

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 9.** Risk of overtopping from old oil water separator due to ingress of rainwater



**Photo 10.** Damaged roof permitting ingress of water

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 11.** Control equipment for Continuous Emissions Monitoring equipment in dryer 4



**Photo 12.** Steam from a leaking valve/damaged flange presenting risk to workers

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 13.** Inappropriate fixed ladder for access to roof at the air quality monitoring station, Kamsar



**Photo 14.** Water pump at Fassaly Foutabhé village with iron removal device to the left

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 15.** Water inside the iron removal device



**Photo 16.** Clear water in the stream at Fassaly Foutabhé (during low flow conditions) used by community members

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 17.** Remedial works – enlargement of sedimentation ponds (to prevent sedimentation of nearby watercourse)



**Photo 18.** Haul trucks observed building up speed on downhill slopes

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 19.** Security post with minimal facilities manned by a lone guard



**Photo 20.** Use of motorcycle battery to charge mobile phone

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022



**Photo 21.** Newly constructed bungalow (for signalling equipment as part of MUOA project)



**Photo 22.** Use of footbridges over the railway line

<b>Title:</b> Photographic Log	<b>Client:</b> CBG
<b>Site:</b>	<b>Date:</b> December 2022

## **APPENDIX 3**

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

**Status of issues raised in the previous site visit reports (March 2022 report and prior reports)**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed (IESC Opinion in December 2022)</b>
March 2022_ 001	CR Team: Resources	Most of the engagement activities (and thus grievances) are taking place in Sangarèdi. The distribution of members of the team between Sangarèdi and Kamsar does not correspond with the actual workload. Engagement activities in Sangarèdi currently require additional resources due to volume of activities being undertaken.	All	Consider revisiting current staff distribution between Kamsar and Sangarèdi. Some of the senior positions currently located in Kamsar should be placed in Sangarèdi along with the incoming recruitment.	Moderate	<b>Open</b>
March 2022_ 002	CR Team: Resources	Ongoing performance issues with the IsoMetrix database, thus necessitating the purchase and installation of a dedicated server in Kamsar.	All	The purchase and installation of a dedicated server in Kamsar is now considered to be a priority in order to alleviate performance issues related to the IsoMetrix database (e.g. slow functioning) and enable it to be used to its full potential.	Moderate	<b>Closed</b> (new server installed in Kamsar)
March 2022_ 003	CR Team: Resources	The CR Manager has been appointed to act as Resettlement Manager. This has been translated into an increase in workload for the CR Manager.	All	The recruitment of a permanent Resettlement Manager is a priority.	Moderate	<b>Open</b>
March 2022_ 004	SEP and Grievance Management Mechanism	The 2022-25 SEP and GMM need to be revised by CBG as per the IESC's/Policy Lenders remarks.	All	CBG to revise and update SEP and GMM as per the IESC's remarks. <i>Post visits note: Draft SEP and GMM updated and near finalised.</i>	Moderate	<b>Open</b>
March 2022_ 005	Management of Change	Limited progress has been made since the previous October 2021 Monitoring Report in terms of the wider understanding and implementation of the MoC Procedure.	All	CBG should continue to finalise the MoC Action Plan and roll out the measures therein as a matter of priority.  In addition, the IESC further recommends that:	High	<b>Open</b> (however the IESC notes good progress has been made)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				<ul style="list-style-type: none"> <li>The new Operations Director assumes a direct responsibility for expediting the implementation of the MoC Procedure.</li> </ul> <p>Systems are put in place to make adherence to management of change mandatory. For example, purchases could be blocked unless evidence is provided that change management was considered as part of any Purchase Order approval.</p>		
March 2022_006	OHS Performance	Management of leading indicators (near misses and safety observations) is insufficient.	All	<p><del>Classification of OHS events – CBG should disaggregate the data on high potential near misses from safety observations to provide an accurate report on actual near misses and to track trends for these events.</del></p> <p>Leading indicators - CBG should identify and track a suite of leading indicators (e.g. events with high severity potential, completion rate for mandatory training, closure rate for corrective actions, number of near misses) that provide a clear understanding of safety-related issues before they develop into significant incidents.</p>	Moderate	<p><b>Partially closed/ open</b></p> <p>(Classification of OHS events is closed but management and use of leading indicators is still in progress)</p>
March 2022_007	OHS Training	<p>The training management tool is not adapted to CBG; there is no system for tracking out-of-date certifications and training courses and the tool used to monitor training is too basic.</p> <p>There is no formal verification of trainees' understanding at the end of safety induction training.</p>	All	<ul style="list-style-type: none"> <li>Training management – Establish an appropriate system or more efficient tool (e.g. automatic reminders for refresher training, tracking out-of-date certifications, list of employees eligible for training based on roles). This will ensure that only personnel with up-to-date certification and training are assigned to perform critical operational and maintenance tasks.</li> </ul>	Moderate	<p><b>Open</b></p> <p>(OHS Training will be integrated on the IsoMetrix database)</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				<ul style="list-style-type: none"> <li>• Golden Rules and safety inductions – The Golden Rules should be presented at all safety inductions and periodically to both direct employees and contractors/subcontractors. Safety inductions, like all internal and external training exercises, must be validated verified by a Q&amp;A or a comprehension test at the end. The training plan should include specific training for OHS Teams and for Managers.</li> </ul>		
March 2022_008	Risk Management and Control of Work	Low control of OHS risks during the execution of tasks, as confirmed by numerous findings during site visits (including in relation to blasting operations, surface miner, traffic on the mine, railway, waste storage (Torabora), lifting operation on jetty, Kamsar Plant)	All	<ul style="list-style-type: none"> <li>• Blasting operation: <ul style="list-style-type: none"> <li>○ An official and more-structured control system (including a checklist for the contractor and checklist for CBG) should be established for use before and after blasting and kept on site. CBG need to confirm that all personnel present at the mine are aware before validating the blasting.</li> </ul> </li> <li>• Surface Miner: <ul style="list-style-type: none"> <li>○ The contractor needs to have (on site) HSE documentation relevant to ongoing site operations/activities and require their employees to wear hearing protection on site</li> </ul> </li> <li>• <del>Traffic on mine:</del> <ul style="list-style-type: none"> <li>○ <del>Physical separations between community traffic lanes and mine haul roads need to be provided whilst clear markings/signs, informing individuals of the danger and prohibition to cross, need to be established/installed. Road signs for mine</del></li> </ul> </li> </ul>	High	<p style="text-align: center;"><b>Open/ Ongoing</b></p> <p style="text-align: center;">(items struck out are considered closed)</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				<p><del>trucks need to be reinforced and a way to improve drivers' knowledge of the traffic plan needs to be identified and implemented.</del></p> <ul style="list-style-type: none"> <li>• Kamsar Plant: <ul style="list-style-type: none"> <li>○ HSE documents must be kept in the workplace at all times, the frequency and media of communication regarding the CBG Golden Rules needs to be increased and improved, the proper use of safety guards on moving equipment needs to be improved.</li> <li>○ CBG should update its permit to work procedure to ensure that operations personnel are responsible for permit issuance, approval and post-completion review of tasks. The HSEC teams should strictly perform compliance assurance against the established control of work standards. This is critical to driving line management accountability for the safe conduct of high-risk activities.</li> <li>○ CBG should complete operational procedures where these are missing, such as for the BuMS. as well as prepare baseline operational risk assessments, prepare a risk register and communicate these to all personnel (both direct employees and contractors). The MUOA Project risk register should also be updated.</li> </ul> </li> </ul>		

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				CBG should prioritise completing a man-machine interface risk assessment and implement appropriate engineering and administrative controls to achieve safe segregation of pedestrians and mobile machinery/equipment at Kamsar and Sangarédi.		
March 2022_009	Incident Investigations & Root Cause Analysis	Concreted efforts and resources should be provided for timely close out of pending actions arising out of the 2021 significant incidents.	All	<ul style="list-style-type: none"> <li><del>CBG should define the composition of the team in charge of incident investigations and root cause analysis (HSEC, Worker, Manager, Direction, members of a workshop or similar facility...) and train them.</del></li> </ul> <p>CBG should ensure prompt closure of corrective actions following approval of incident investigation reports. Concrete efforts and resources should be provided for timely close out of pending actions arising from the 2021 significant incidents.</p>	High	<b>Partially closed/ open</b> (items struck out are considered closed)
March 2022_010	Maintenance & Asset Management	Poor maintenance of equipment (safety technologies upgraded slowly).	All	CBG should review maintenance and asset integrity in detail (including electrical installation and moving/rotating equipment).	High	<b>Open/ Ongoing</b>
March 2022_011	Leadership, Commitment and Accountability	<p>Since March 2021, findings indicate that there is low or no continuous improvement of the management system (reactive, not proactive).</p> <p>CBG should commit to create an organisational culture that values health and safety.</p>	All	<ul style="list-style-type: none"> <li>All inspection actions need to be compiled in a single register to facilitate processing and follow-up by the HSE team (with reminders to the action leaders). All findings must be closed in a timely manner.</li> <li>CBG should utilize the re-design of roles and responsibilities exercise to establish clear accountabilities, SMART performance objectives and responsibilities for HSE matters for all levels of senior management and supervisory teams, based on well-defined</li> </ul>	Moderate	<b>Closed</b> (new organisation with sponsors and several 2-monthly meetings with managers of different levels. The language for

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				<p>authority levels that can deliver safe and reliable operations and practically bring about the needed HSE leadership and accountability to line management.</p> <ul style="list-style-type: none"> <li>In addition to employee safety sharing, the HSE team should provide a prepared safety shares library with lessons learned and actions already identified (preferably linked to the relevant CBG Golden Rules).</li> </ul> <p>CBG should clarify the language for the HSE system. All communications and training should be in French (the official language of the country and of the Labour Code), but it may be necessary to make some communications in local languages in order to increase understanding amongst all personnel.</p>		the HSE system is French)
March 2022_012	Contractor Safety Management	CBG should finalize the contractor management plan and support contractors in their continuous improvement approach.	All	<ul style="list-style-type: none"> <li>Finalise the contractor management plan and the capability assessment of contractors.</li> </ul> <p>Systra should digitise the tracking of actions and assign levels of importance to impose an appropriate time for the correction of actions and possible associated sanctions (with the highest level being to stop work).</p>	High	<b>Open/Ongoing</b> (almost closed)
March 2022_014	Air Quality – finalisation of AQMP	CBG was unable to complete wet season stack emission testing in 2021 as a result of COVID-19 and security travel restrictions. Consequently, it is unable to meet the timeframes specified in the ESAP Item 13 for finalisation of the AQMP.		CBG and Lenders need to formally agree the steps needed and a revised timeframe for the update of the AQMP, inclusive of agreement on dryer stack emission limits.	<b>High</b>	<b>Superseded</b> (wet season sampling completed and revised timeframe agreed for

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				<p>CBG should use all reasonable efforts to expedite finalisation of the AQMP. The IESC therefore recommends</p> <ul style="list-style-type: none"> <li>early appointment of an engineering design consultant under a preliminary scope of work (potentially the external audit identified within CBG's action plan).</li> <li>responsibility for completion of the AQ CAP and the ESAP item 13 relating to revision of the AQMP sits with the Operations Director.</li> </ul>		finalisation of AQMP)
March 2022_015	Air Quality – fugitive dust emissions	An evaluation of dust suppressants has been ongoing for several months. Dust generating activities are an inherent issue for CBG's activities both at the mine and port locations.		<p>CBG should expedite studies not the use of commercial dust suppressants and explore opportunities to use these and other techniques to further reduce fugitive dust emissions including:</p> <ul style="list-style-type: none"> <li>efforts to minimise large accumulations of dust should be increased, and</li> <li>application of dust suppressants at Kamsar evaluated following completion of the ongoing dust suppressant study</li> </ul>	<b>Moderate</b>	<b>Open</b> (efforts to reduce fugitive emissions ongoing)
March 2022_016	Oil Water Separator, Kamsar	Whereas material progress has been made in identifying and initiating a solution, the oil concentrations in treated effluent remain above Project Standards at the time of the site visit.		Full implementation of the agreed oil/water separator corrective action plan	High (pending implementation of the corrective action)	<b>Open</b> (ongoing implementation of action plan)
March 2022_017	Sangarédi WWTP	The new UV treatment plant at the Dounsey WWTP has been commissioned, however coliforms are still being detected.		Performance of the UV treatment plant should be investigated and optimised (as is the current CBG intention).	Moderate	<b>Open</b>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
		The sludge tanks have not been emptied although a contractor has been identified. This is a long overdue action.		Emptying of the sludge tank should be prioritised and any performance improvement at the WWTP recorded.		
March 2022_018	Surface water discharge - Kamsar	Elevated COD levels and suspended sediments were recorded in surface river water surrounding the Kamsar processing facility.  Surface water discharge channels (fed by dewatering of the primary crusher pit), that were heavily laden with fine sediments, were observed discharging to the River Dougoufisa with no apparent sediment trap in place.		The causes of elevated levels of contaminants should be investigated and were found to be a result of CBG's activities, actions to identify source of contaminants/improve quality of discharge should be identified.	Moderate	<b>Open</b>  (any contamination attributed to surface drainage network - remains open pending upgrade to drainage system)
March 2022_019	N&V impacts	Noise levels taken from various rail and mine locations are generally high, however it is not clear whether the noise is generated by CBG activities or other background sources unrelated to CBG's activities.		Further interpretation of N&V monitoring results is required, particularly where there are apparent exceedances of Project Standards to determine whether noise levels are attributable to CBG activities and therefore require mitigation. Measured results should also be compared with background levels and the 3 dB increase above background limit taken into consideration when assessing compliance with applicable standards.  Factors influencing noise levels, including both CBG noise and other noise sources should be described and used to define any corrective actions where necessary.	Moderate	<b>Open</b>
March 2022_020	N&V impacts	The Project Standard for airblast overpressure was regularly exceeded prior to January 2022.		Further interpretation of airblast overpressure results needed in order to understand the relationship between blast charge, stemming practices, meteorological conditions and proximity communities to better understand the factors leading to	Moderate	<b>Closed</b>  (further monitoring showed positive

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				exceedances/opportunities to avoid future exceedances.		results following change in blasting techniques)
March 2022_021	Waste management	<p>Progress with the design and construction of the two waste management facilities remains slow.</p> <p><u>Tora Bora</u> - During the site visit, workers facilities were found to poor at Tora Bora; a containerised office facility that would also provide shelter/eating area had not been commissioned.</p> <p><u>Sangarédi</u> - waste was found to be burning.</p>		<p>The root cause of the slow progress, for example, lack resources/reliance of procurement and maintenance departments in CBG, should be identified.</p> <p>The commissioning of the office at Tora Bora should be prioritised. CBG's Senior Management should step in if the HSECQ Department is being deprioritised.</p> <p>The cause of fires at Sangarédi waste facility should be investigated and take steps to eliminate further fires in the future. Where possible the fires should be extinguished.</p>	Moderate	<p><b>Closed</b></p> <p>(issues identified for Tora Bora have been addressed and there was no evidence of fires at Sangarédi landfill)</p>
March 2022_022	MUOA Project/railway safety	Delays on betafences and footbridges installation result in ongoing risk of serious injuries/fatalities involving community members in urban areas.	Construction	Liaison with the procurement department with respect to delays in the procurement process and how this can be expedited, with particular emphasis afforded to the installation of fencing at the highest risk areas	High	<p><b>Closed</b></p> <p>(fences not erected, however procurement of fencing completed)</p>
March 2022_023	Hommes Piquets	<p>Based on the IESC's impromptu meetings with Hommes Piquets it was found that lacked information and authority to perform their duties, including:</p> <ul style="list-style-type: none"> <li>No train timetable</li> </ul>		<p><del>The hommes piquet need to be better trained and supervised. They should be more aware of emergency procedures and their roles and responsibilities.</del></p> <p>CBG should use an official and more-structured control system for rail activities. CBG need to confirm that all personnel present along the railway are aware before the passage of trains. Kilometre posts need to</p>	Moderate	<p><b>Open</b></p> <p>(A new automation system is being implemented and training has been provided</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
		<ul style="list-style-type: none"> <li>No means or authority to stop the train in an emergency situation</li> <li>Poor understanding of their own risks</li> </ul>		<p>be installed, alongside railway signs for the communities, and a way to communicate the train schedule to the hommes piquet needs to be identified and implemented.</p> <p>All hommes piquet should be issued with VHF radio/other means of communication such that they can communicate with the train driver. Training in Railway Safety Communications Procedures, as prescribed in the Road and Rail Safety Management Plan, should be provided.</p>		but the working conditions are the same)
March 2022_024	MUOA Project	Risks of opposition to betafence and footbridge installation due to unrealistic expectations of associated employment opportunities prior to their installation/construction and short-term impact of the betafence on the daily life of inhabitants, especially in Kamsar.	Construction	<p>Close liaison (between the CFB and CR teams) on installation to avoid community opposition and manage employment-related expectations among communities.</p> <p>Engagement with the affected communities when betafence, level crossings and footbridges are installed to evaluate the degree of acceptance of these features and determine whether additional measures are required in order to avoid opposition, maintain social cohesion and ensure access to basic infrastructures on both sides.</p>	Moderate	<b>Open</b> (Installation not yet started)
March 2022_025	MUOA Project	Use of stepped footbridges will prevent their use by people with physical disabilities. People unable to climb and descend steps will have to use level crossings.	Operations	<p>Engage with communities to evaluate the number and residence of persons with reduced mobility (e.g. due to age or physical disability) that will not be able to use the footbridges.</p> <p>Explore mitigation measures to alleviate risk of pedestrian accidents, including physical separation of vehicles and pedestrians at level crossings.</p>	Minor	<b>Open</b>

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed (IESC Opinion in December 2022)</b>
March 2022_ 026	Communicable Disease Prevention	The HIV and AIDS programme, as specified in the Community Health and Safety Management Plan, is no longer in place (no activities were undertaken in 2021 due to budget constraints; the availability of budget to implement activities in 2022 is yet to be determined).	All	HSECQ to liaise with the appropriate departments to ensure hand over of responsibility and allocate budget to resume programme.	Minor	<b>Closed</b> (Budget has been allocated)
March 2022_ 027	Communicable Disease Prevention	Delays to the implementation of the joint malaria programme	All	Finalise and validate the ToR to relaunch the joint malaria programme.	Minor	<b>Closed</b> (ToR Launched)
March 2022_ 028	Hamdallaye Resettlement Site	Drainage issues partially fixed but some problems remain, resulting in localised flooding, with potential damage to structures as a result.	Operation	Monitor potential flooding during the rainy season and plan corrective works accordingly.	Moderate  Low	<b>Open</b> (Significance reduced to Low to reflect progress made)
March 2022_ 029	Hamdallaye Resettlement Site	Lack of satisfactory waste collection at Hamdallaye Resettlement Site	Operations	Facilitate the establishment of a sustainable solid waste collection and elimination system and engage the Hamdallaye Resettlement Committee and community members in this respect.	Moderate	<b>Open</b>
March 2022_ 030	Hamdallaye Resettlement Site	There are numerous requests from the Hamdallaye Resettlement Committee with respect to community infrastructure	Operations	Manage certain unreasonable expectations from the Hamdallaye Resettlement Committee with respect to community infrastructure, strengthen management capacity, and finalise the handover accordingly, based on clear and consulted upon modalities.	Moderate	<b>Open</b>
March 2022_ 031	Hamdallaye Resettlement Site	While residential and agricultural land at the Hamdallaye resettlement site has been allocated by CBG, this process has not been concluded with the issuance of	Operations	Launch the land tenure formalisation and securitisation process; in this context, liaise with neighbouring mining operations (e.g. GAC) to	High	<b>Superseded</b> (see Dec 2022_041)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
		formal land titles to PAPs by the relevant State agencies.		understand how they obtained security of tenure for the PAPs.		
March 2022_ 032	Fassaly Fouthabé	School constructed as per the RAP but remains unstaffed.	Operations	While continuing to liaise with the local education directorate to obtain allocation of teachers for the school, explore alternative avenues with the community (e.g. "maîtres communautaires").	High	<b>Open</b>
March 2022_ 033	Fassaly Fouthabé	Cumulative impacts to the community are potentially high and may become difficult to mitigate.	Operations	Prepare a long-term assessment of the situation of mining and hauling cumulative impacts around Fassaly Fouthabé and consult with the community.	High	<b>Superseded</b> (see Dec 2022_ 042)
March 2022_ 034	Hamdallaye and Fassaly Fouthabé RAP – Livelihood Restoration	Current activities do not meet their intended objectives.	Operations	<p>Prepare a comprehensive corrective action plan for all livelihood restoration activities in both locations, which:</p> <ul style="list-style-type: none"> <li>• takes a broader perspective of the evolution of both communities (particularly the urbanisation of Hamdallaye);</li> <li>• accounts for generational gaps between older and younger people;</li> <li>• seeks better integration between livelihood restoration and CBG's procurement and recruitment needs;</li> <li>• revisits the premises of gardening activities at both sites</li> <li>• revisit the principles of the poultry projects and prioritise sustainability over productivity;</li> <li>• revisit the goat projects or consider abandoning them;</li> <li>• update the action plan for the grasscutter projects;</li> </ul>	High	<b>Superseded</b> (see Dec 2022_043)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				<ul style="list-style-type: none"> <li>• provide a revolving fund to the bakery project or other substantial material support;</li> <li>• introduce a stronger business development component;</li> <li>• establish strong, day-to-day CBG oversight of CECI; and</li> </ul> formalise all of the above in an addendum to the Hamdallaye and Fassaly Fouthabé RAP.		
March 2022_035	Compensation matrix	CBG have been working on an update to the compensation matrix	Operations	When available, submit the updated compensation matrix to IESC and Policy Lenders	Minor	<b>Superseded</b> (see Dec 2022_044)
March 2022_036	Other LRPs	Thiapikouré, Kankalaré, and MUOA LRPs are about to be contracted to implementation partners	Operations	Review and revisit, as warranted, livelihood restoration activities in light of the recommendations pertaining to the Hamdallaye and Fassaly Fouthabé RAP livelihood restoration activities.	High	<b>Superseded</b> (Dec 2022_045)
March 2022_037	Resources for resettlement implementation	The capacity of the CBG Resettlement Team remains weak with regards to the tasks at hand	Operations	<ul style="list-style-type: none"> <li>• <del>continue to increase staffing within the Resettlement Team with a focus on livelihood restoration;</del></li> <li>• <del>create a monitoring and evaluation / data management function within the Resettlement Team;</del></li> <li>• seek to establish a better gender balance within the Resettlement Team, and train staff members (both male and female) on basic gender sensitivity;</li> <li>• seek better integration of the CR and Resettlement Teams; and</li> </ul>	<b>High</b>	<b>Open</b> (unless struck out)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
				<ul style="list-style-type: none"> <li>clarify positions and titles within the Resettlement Team and secure a long-term Resettlement Manager responsible for leading the team.</li> </ul>		

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Oct 2021_002	Contractor management and the Integrated Management System	<p>Although the CMP has been in place since January 2019, CBG has not yet undertaken all actions needed to implement the plan fully.</p> <p>CBG appointed, in June 2021, an HSE Coordinator with the remit of supporting the HSECQ team on implementing the IMS and the suite of E&amp;S Action Plans (as presented in the E&amp;S Management Plans). In addition, the HSECQ Department will appoint soon a CMP Coordinator.</p>	All	<p>The IESC supports current initiatives regarding CMP compliance and strengthening of the IMS, noting the CMP coordinator will be responsible for ensuring contractors comply with CBG's requirements.</p> <p>The IESC further stresses the importance of a comprehensive and targeted audit of contractors against the requirements of the CMP, including audit of both contractors' H&amp;S documentation (pre and post contract award) and actual safe working practices on the ground.</p>	<b>High</b>	<p><b>Superseded</b> (Dec 2022_027)</p> <p>CMP Coordinator has been appointed. Effectiveness of role to be further assessed in subsequent site visit.</p>
Oct 2021_003	CR team recruitment	The appointment of the Database specialist by the end of Q3 2022 and the expectation that IsoMetrix will be functioning fully by end of Q1 2022 means that there will be a six-month period when IsoMetrix will not be used to its full potential.	All	Consider bringing forward the appointment of Database specialist so that the gap between the Database specialist being employed and a fully functioning IsoMetrix is reduced to the maximum extent possible.	<b>Moderate</b>	<p><b>Open</b> (database specialist not appointed at time of and December 2022 site visit)</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
Oct 2021_ 006	CR team: training	Several training events have been delayed by potentially up to one year and dates for these events have not been agreed with the provider. There is an opportunity for the CR Manager to consider actions that could be adopted to improve training outcomes while minimizing disruption to workloads.	All	<p>Consider:</p> <ul style="list-style-type: none"> <li>• Planning and organizing staff time so that there is minimum disruption to workloads while fulfilling training commitments. Possible options include careful selection of personnel to be attending specific training events, scheduling events so that one event immediately follows another ('back-to-back' sequencing) and providing incentives for some training to be undertaken outside standard working hours;</li> <li>• <del>Applying the 'train the trainer' model where only one or two staff members attend a training event and then they train their colleagues on the key principles and/or practices in shorter subsequent training events; and</del></li> </ul> <p>In the context of future training needs for the period 2023 – 2024; selecting fewer key training topics/events (perhaps a maximum of 10 topics/events)</p>	<b>Moderate</b>	<b>Open/ Ongoing</b>  (Points have been taken into consideration in the 2023 training plan - yet actual schedule and training are yet to be rolled out and monitored)
Oct 2021_ 008	Revision of Environmental Management Plans including the Contractor Management Plan (and Procurement)	<p>The planned revision of certain Environmental Management Plans is overdue and implementation of actions specified within Action Plans are behind the original 2019 schedules.</p> <p>Reliance on the import of specialist equipment, exacerbated by a slow procurement process, has delayed the</p>	All	<p>CBG should conduct a review of its procurement process in order to identify opportunities to expedite procurement of goods and services across all E&amp;S disciplines.</p> <p>See also March 2021_007.</p>	<b>Moderate</b>	<b>Open</b>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
		<p>execution of E&amp;S actions specified in the Management Plans.</p> <p>The recommendation made during the March 2021 VSV remain valid.</p>				
Oct 2021_009	Female participation in stakeholder meetings	Since 2020, CBG has implemented actions to increase female attendance and participation in community-focused meetings. To date, success has been limited though insufficient time has passed to provide a definite conclusion.	All	<p>Consider implementing one or more of the following options:</p> <ul style="list-style-type: none"> <li>• Identifying informal/formal female associations in the villages such as womens' farming/gardening groups and then organizing meetings;</li> <li>• Organizing meetings in the fields where groups of women may be working together (in rest periods and not interfering with work regimes); and</li> </ul> <p>Random walks in villages and to/from agricultural areas to engage in informal conversations with individuals or small groups of women</p>	<b>Moderate</b>	<p><b>Open</b></p> <p>(Focus Groups Discussions with women held though additional time and actions (e.g. on GBV-SH) are needed to close this finding)</p>
Oct 2021_010	Grievance mechanism	The community grievance mechanism is not functioning effectively (low annual number of grievances recorded for past five years)	All	The community grievance mechanism to be reviewed and revised, as appropriate, within the context of preparation of the SEP 2022-2025.	<b>High</b>	<p><b>Open</b></p> <p>(status unchanged until SEP 2022-25 sign off by IESC)</p>
Oct 2021_011	Grievance mechanism	Current planned training on the grievance mechanism is expected to occur in Q3 and Q4 of 2021. These dates are not aligned with the dates for finalization and dissemination of the SEP 2022 -2025	All	Enter into discussions with IFC Advisory to re-schedule the training 'Management of Grievance Mechanism' so that it is delivered at dates soon after the revised grievance mechanism is finalized and disseminated	<b>Moderate</b>	<p><b>Open</b></p> <p>(IFC Advisory training yet to be deployed)</p>

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Oct 2021_ 012	Dredging	<p>The 2021 dredging campaign did not strictly adhere to certain actions set out in the Dredge Management Plan. In particular, deficiencies were observed in terms of:</p> <ul style="list-style-type: none"> <li>- characterization of sediment from the dredging area and disposal area;</li> <li>- characterization of the benthic fauna from the dredging area and disposal area; and</li> <li>- underwater noise monitoring.</li> </ul> <p>The IESC understands new contracts with external laboratories and an ongoing marine survey will allow the deficiencies to be addressed in time for any further dredging campaigns.</p>	Operations	<p>Stricter adherence with all applicable the requirements of the DMP is required in order to confirm impacts from dredging are known and minimised. Specifically:</p> <ul style="list-style-type: none"> <li>- characterization of sediment from the dredging area and disposal area;</li> <li>- characterization of the benthic fauna from the dredging area and disposal area; and</li> <li>- underwater noise monitoring.</li> </ul> <p>The DMP to be reviewed in line with the periodic management plan review cycle ahead of the next dredging campaign.</p>	<p><b>Moderate</b> <b>Low</b> (re-categorised on the basis of work in progress.</p>	<p><b>Open</b> (pending 2022 dredging campaign complete/results of surveys available)</p>
Oct 2021_ 013	Land Rehabilitation and Relinquishment	<p>CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues, despite the Mine Rehabilitation and Conceptual Closure Plan (MRCCP) presenting priority actions to begin by end 2018 (with one to be completed by end 2018)</p>	Operations and Decommissioning	<p>Work to be initiated immediately to formalize CBG's current practice, for managing mined land rehabilitation and relinquishment, into a written procedure which includes not only key actions and responsibilities, but also standardized documents, to be signed by all parties, which record agreements reached/actions completed. This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP, relevant to mined land rehabilitation and relinquishment</p>	<p><b>Moderate</b></p>	<p><b>Open</b></p>
Oct 2021_ 016	Management of suppliers	<p>The roll-out of LWC requirements does not yet extend to suppliers</p>	All	<p>Design of an action programme to apply the relevant PS2 requirements to CBG's suppliers (those that fall</p>	<p><b>Moderate</b></p>	<p><b>Open</b></p>

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				into the definition of a contractor as presented in PS2)		
Oct 2021_ 017	Integration of LWC requirements in bid evaluation and contractor management	<p>Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are:</p> <ul style="list-style-type: none"> <li>• Considered in the bid evaluations and contractor selection process, especially structured participation in the Evaluation Committee;</li> <li>• Presented in future reviews and potential changes to the 'Minimum Requirements' (and therefore included with RfPs); and</li> </ul> <p>Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.</p>	All	<p>CBG to ensure that:</p> <ul style="list-style-type: none"> <li>• The bid evaluation process is amended so that the HR Department receives all bids in advance of Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee's decision/s;</li> <li>• HR Department to designate a senior staff member to receive PS2 training to assist it fulfil its role in both the contractor selection process and subsequent contractor management (latter issue to be examined in the next IESC site visit);</li> <li>• All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan (with removal of LWC provisions from the Local Content Plan); and</li> </ul> <p>The HR Manual, WGM and Code of Ethics to be provided in all RfPs.</p>	<b>High</b>	<b>Open</b>  (understood to be work in progress - to be assessed in next IESC visit)
Oct 2021_ 018	Environmental Monitoring Programme	CBG has been unable to implement its Environmental Monitoring Programme in full for a number of reasons, including most notably a lack of an external laboratory for complex analyses and limited in house equipment/analytical capabilities. At the time of reporting,	All	<p>Further effort is required to ensure full implementation of the EMoP and monitoring components of the environmental management plans, including:</p> <ul style="list-style-type: none"> <li><del>Finalisation of outstanding contracts with external laboratories;</del></li> <li><del>Procurement of a data management system;</del></li> </ul>	<b>Moderate</b>	<b>Partially closed/ superseded</b>  (items struck out are

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		contracts with external laboratories were either signed or signature was imminent.		<p><del>Undertake a resourcing 'Needs Analysis' to determine current and future resource and training needs; and</del></p> <p>Disclosure of monitoring results to affected communities in an appropriate and meaningful format.</p>		considered closed
Oct 2021_020	Air quality – dust suppression	CBG has trialled chemical dust suppressants, however the outcome of the trials is unclear.	All	CBG to confirm the outcome of the trials/its use of chemical dust suppressants on haul roads. Where applicable, details of any chemical dust suppressants being used should be made available to the Lenders via the agreed Management of Change Procedure.	<b>Low</b>	<b>Superseded</b> (See March 2022_015)
Oct 2021_021	Air quality – commissioning of old power generating units	Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the original Kamsar central powerhouse by 2020. The IESC understands the old generators are no longer being used, however, they have not been decommissioned.	All	CBG should explain why the power generators have not been decommissioned to date.	<b>Low</b> (as long as old generators are not used)	<b>Open</b> (decision to decommission generators is under evaluation, although CBG confirmed no intention to re-start these units)
Oct 2021_022	Water quality - mine effluents	A spring used by Fassaly Foutabhé community members appears to have been adversely affected by CBG's mining activities.	All	CBG should investigate the causes of the contamination and, if found to be a result of CBG's activities, implement corrective measures to restore the quality of the spring water or ensure a replacement water supply for Fassaly Foutabhé in the event the spring water quality cannot be restored.	<b>Moderate</b>	<b>Open</b> (filter dykes failed – CBG seeking support from Alcoa specialists))

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Oct 2021_023	Water Quality - Bypass of the Kamsar WWTP	The WMP Action Plan includes specific actions relating to use of an untreated effluent bypass at the Kamsar WWTP outside of emergency situations. Investigations have confirmed direct discharge of untreated sewage water to the estuary only occurs during high rainfall events because of rainwater ingress to the sewage drainage network.	All	<p><del>CBG should expand its survey of the sewage drainage network to identify locations prone to rainwater ingress and repair elements prone to rainwater ingress.</del></p> <p>A flowmeter should be installed to monitor the frequency of discharge events and volume of untreated water discharged to the estuary. Monitoring should confirm no discharge of untreated sewage water during normal operating conditions.</p>	<b>Minor</b>	<p><b>Open</b> unless struck out (network surveyed and repairs made)</p> <p>Commissioning of flow meter pending)</p>
Oct 2021_024	N&V impacts	<p>Review of noise and vibration management has identified the following issues:</p> <ol style="list-style-type: none"> <li>Noise monitoring has been hampered by broken and malfunctioning equipment/software.</li> <li>Monitoring at specific sensitive locations along the railway has not occurred.</li> <li>There has been repeated exceedances of airblast overpressure limits in 2020.</li> </ol>	All	<p>Confirmation of the efficacy of measures put in place is required as follows:</p> <ol style="list-style-type: none"> <li><del>Expedite receipt of ancillary equipment and initiate use of the new noise meters at the earliest opportunity.</del></li> <li><del>Further monitoring is required at specific sensitive locations along the railway. Noise and vibration measurements should be taken at a setback distance from the railway line that is equivalent to that of the sensitive receptors.</del></li> <li>CBG should engage with potential affected residents at these locations to determine the level of disturbance currently caused.</li> </ol> <p><del>CBG should confirm through monitoring data that measures to meet airblast overpressure limits have been successful</del></p>	<b>Moderate</b>	<p><b>Partially Closed</b> (items struck out are considered closed)</p> <ul style="list-style-type: none"> <li>Noise meters arrived</li> <li>New monitoring locations along railway</li> <li>Additional overblast data is encouraging)</li> </ul>

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Oct 2021_ 025	Waste management	Progress in the implementation of the waste management Action Plan continues with a significant number of actions no longer relevant or behind the original schedule specified in the action plan.  Community attitudes towards CBG's use of Bendougou have not been evaluated by the CBG CR Team. The level of risk of community objections/blockades, similar to those that occurred in the past, is therefore unknown.	All	As reported previously, the Waste Management Plan should be updated to reflect CBG's current waste management strategy, including the potential use of Bendougou facility and longer-term strategy following end of the Tora Bora waste facility's design life.  - Also, the CR team to engage with the affected community members prior transportation of wastes to Bendougou.	<b>Moderate</b>	<b>Open</b>
Oct 2021_ 026	Hazardous materials management	Radioactive lightning rods are present on CBG facilities. These are prone to decay and damage over time and therefore need to be carefully managed. Currently CBG's plan for ultimate dismantling and disposal of these radioactive sources is undefined.	All	A longer-term solution for the safe dismantling and disposal of radioactive lightning rods is required as per action 4.18 of the HAZMAT Action Plan. The Waste Management Plan will also require update to include the disposal route(s) for this waste.	<b>Minor</b>	<b>Open</b>  (disposal plan scheduled for mid-late 2022)
Oct 2021_ 027	Energy efficiency/GHG emissions	CBG is refining its SOP for GHG emission monitoring and reporting.	All	IESC recommends that GHG emissions reporting data is broken down such that fuel use/GHG emission can be normalised (tonnes CO <sub>2</sub> /unit of bauxite produced) and attributed to the different users of the railway (under the MUOA)/consumption of electricity by communities in Kamsar and Sangarédi. The methodology for apportioning GHG emission to different users can be detailed in the revised SOP. Visiting vessels (e.g. dredgers) with their own fuel source should also be captured in the GHG emissions calculations.	<b>Minor</b>	<b>Open</b>  (procedure schedule for June 2022 – open pending review of 2022 AMR)

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Oct 2021_ 030	Rail-related fatalities of community members	Recent increase in risk, in Kamsar, of rail-related fatalities of community members who have mental health problems.	All	Consider and identify, in conjunction with the operator of the treatment centre (traditional healer), feasible measures (both 'soft' and 'hard') aimed at reducing the risk of rail-related fatalities involving his patients and then consolidate the measures into an action plan to be implemented as soon as possible after the plan is agreed.	<b>High</b>	<b>Closed</b> (a fence around the Kamsar treatment facility has been installed; awareness campaigns regularly organized)
Oct 2021_ 033	Hamdallaye and Fassaly Foutabhé grievances/ <i>doléances</i>	At the meeting of 3 August 2021, a wide range of issues, concerns and requests were raised by the community representatives many of which do not appear in the grievance and <i>doléance</i> registers	Operations	Issues/concerns/requests raised by participants should be logged within the grievance/ <i>doléance</i> management system so that they can be tracked and closed	<b>Moderate</b>	<b>HOLD</b>
Oct 2021_ 038	Monitoring (CRPF)	CBG has developed preliminary framework for monitoring. This framework is not consistent with the "Monitoring" chapters in the CRPF and the LRPs, and, also, it mostly focuses on progress indicators and not outcomes	Operations	Refine the monitoring system (indicators, methods, frequencies) on the basis presented in the CRPF and the baseline sections of the LRPs (taking into account the generic Policy Lender/IESC comments [18 October 2021]), on the Kankalaré RLRAP), (ii) distinguish progress from outcome (or impact) indicators and (iii) create a dedicated monitoring function within the team and resource it accordingly (at minimum, one full-time staff member)	<b>High</b>	<b>Open</b> (see March 2022_035)
Oct 2021_ 040	Resettlement implementation capacity	Procurement of required goods and services is not meeting resettlement needs cost-effectively and delivery of	Operations	HSECQ and Procurement and Logistics departments to establish a small working group to adapt the current procurement procedure by creating i) a means of	<b>High</b>	<b>Superseded</b> (see comment applicable to the wider

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		assistance to affected individuals, households and communities is delayed		accelerating resettlement-related requirements and ii) designing a 'fast track' route for high priority requests		procurement process)
Oct 2021_041	BAP Implementation	In the IESC's March VSV, concern was expressed about the delay in implementing BAP actions with a recommendation requiring regular updates to be provided via established communication channels, such as the bi-weekly E&S calls. These updates have not occurred.	All	Regular updates to occur, but less frequently than the bi-weekly calls; instead CBG to provide an update on 'BAP Action Implementation Status' in specified (by the IESC) E&S bi-weekly calls.  <del>In the interim, CBG is to prepare a Memo on the current status of BAP Action Implementation (post VSV note: memo received) with the first of the regular bi-weekly call updates to occur no later than 4 weeks after receipt of the Memo by the IESC/Lenders.</del>  Note: the action lies with the IESC to include periodic biodiversity updates in bi-weekly call agendas.	Minor	<b>Open</b> (unless struck out) Ongoing with progress being made
Oct 2021_042	Biodiversity Inspections	Sedimentation of watercourses identified on a CBG site (non-conformity) and on a COBAD Road site	All	Provide evidence of the CBG's best efforts to persuade COBAD to address the sedimentation of a watercourse arising from the COBAD Road.	Minor	<b>Close</b> (evidence provided)
March 2021_005	NoCo Exploration	Community consultations occur after the E&S Rapid Appraisal stage. The draft Compensation and Resettlement Policy Framework shows that community consultations occur prior to impact mitigation measures being defined.	PS1	One round of community consultations to be implemented as part of the E&S Rapid Appraisal stage, at a time which CBG considers most appropriate in the local context.	Moderate	<b>Open</b> (Details of the studies to be undertaken for NoCo feasibility not yet available)

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March 2021_ 006	NoCo Exploration	The exploration campaign affects a relatively large area and application of the LDP process to each annual drilling campaign means that the cumulative impact of the three drilling campaigns in all three plateaux over a three-year period is not factor in drilling campaign decision-making for each LDP.	PS1	Undertake a rapid cumulative E&S assessment of the exploration campaign, as if it were a single project, prior to the first E&S rapid impact appraisal. This cumulative assessment to focus on identifying and evaluating the key risks/mitigation measures to inform the individual LDP-level E&S rapid impact appraisals.	High	<b>Open</b>  (Details of the studies to be undertaken for NoCo feasibility not yet available)
March 2021_ 008	Social Management Plans	These Plans were approved in early 2019 and have a 2-year review cycle (except for the Local Content Plan which is to be reviewed, "...as appropriate"). Given the challenges that have emerged in implementing the actions; these reviews provide an opportune moment for a comprehensive evaluation of the continuing relevance of all actions, especially, those actions that are continuous or on-going.	PS1	Unamended Plans to are reviewed and updated in line with the 2-year review cycle. In this context, the CR team to evaluate and amend the Plan actions and timescales, as necessary, considering both the results to date from implementing the existing actions and, also, emerging issues that necessitate adding new actions. The amended Plans /Action Plans must identify priority time-critical actions.	Moderate	<b>Open</b>
March 2021_ 010	Female submission of grievances	Grievances appear to be submitted exclusively by males.	PS1	As part of its efforts to increase female participation in stakeholder engagement, it is recommended that CBG considers ways in which women can be encouraged to submit grievances directly and not only via male relatives or male community members.	Minor	<b>Open</b>  (CBG continues to 'test' options to increase female participation)
March 2021_ 011	Communications Plan for 2021	CBG's Communications Plan for 2021 does not include recent important HR documents in its employee 'explanation' actions.	PS1	The actions presented under 'Internal - Operational Excellence', concerning HR documents, should be amended to show the current new key HR documents and not only older, though still current documents.	Moderate	<b>HOLD</b>  (to be revisited in future site visit)

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March 2021_ 012	Communications Plan for 2021	CBG's Communications Plan 2021 does not include a 'procedure' for managing external communications as required by PS1 (para. 34).	PS1	CBG to design a procedure for managing external communications and then inserts it into the Plan ready for implementation in 2022.	Low	<b>HOLD</b> (to be revisited in future site visit)
March 2021_ 022	Integration of LWC requirements in bid evaluation and contractor management	<p>Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are:</p> <ul style="list-style-type: none"> <li>• Considered in the bid evaluations and contractor selection process, especially structured participation in the Evaluation Committee;</li> <li>• Presented in future reviews and potential changes to the 'Minimum Requirements' (and therefore included with RfPs); and</li> </ul> <p>Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.</p>	PS2	<p>CBG to ensure that:</p> <ul style="list-style-type: none"> <li>• The bid evaluation process is amended so that the HR Department receives all bids in advance of Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee's decision/s;</li> <li>• HR Department to designate a senior staff member to receive PS2 training to assist it fulfil its role in both the contractor selection process and subsequent contractor management (latter issue to be examined in the next IESC site visit);</li> <li>• All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan (with removal of LWC provisions from the Local Content Plan); and</li> </ul> <p>The HR Manual, WGM and Code of Ethics to be provided in all RfPs.</p>	High	<b>Open</b> (CBG reports that these recommendation s will be addressed in work to be done to strengthen contractor management in 2022)
March 2021_ 027	N&V impacts – rural areas adjacent to railway	To date CBG has not specified feasible mitigation measures that could be implemented in the event noise standards are exceeded following the increase in ore transported by rail.	PS3	<p>The IESC recommends the following actions are completed:</p> <ul style="list-style-type: none"> <li>• <del>Confirmation of the location of sensitive rural receptors and distances from the railway line;</del></li> </ul>	High	<b>Open</b> (unless struck out)

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		A final solution could involve resettlement of affected parties. CBG should ensure alternative mitigation measures are identified to avoid resettlement.		<ul style="list-style-type: none"> <li>Establishment of a robust baseline N&amp;V data set (before train numbers further increase); and</li> </ul> Identification of site-specific feasible mitigation measures in the event they should be needed i.e. availability of space and attitude of potentially affected parties to barriers/other measures). This is likely to be limited to installation of noise barriers and as such will need the involvement of the CR team in community consultations.		
March 2021_034	Hamdallaye resettlement	Some infrastructure works remain to be completed (e. g. drainage).	Operations	Complete the outstanding infrastructure works prior to onset of the 2021 rainy season.	Low	<b>Closed</b>
March 2021_036	Hamdallaye livelihood restoration	Crops have been affected by pests. The benefit of the 2-year fallow period on the 56 Ha is questionable if no other measures apart from provision of topsoil are taken to improve fertility.	Operations	Ensure that CECI mobilizes appropriate agronomy expertise and consider alternative crops with better resilience to pests and mixed crops and consider use of phosphorus and potassium fertilizers, as well as “green fertilizers”) to enhance the fallow period.	Moderate	<b>Open</b>
July 2020_007	Stakeholder Engagement Plan (SEP)	The SEP is dated 2016 and is time-bound (however, with a flexible date for revision/updating, “ <i>The SEP will be updated subsequent to completion of the phase 2 ESIA</i> ”). In line with the SEP expectation, it was revised to incorporate the MUOA Project in June 2020. Given that the SEP has been in force for almost 5 years, it is now necessary for an overall SEP revision/update to occur.	PS1	Revise/update and re-issue the SEP. This revised/updated SEP should be clearly time-bound (January 2022 to December 2025) and disclosed publicly.  <del>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).</del>	Moderate	<b>Open</b>  (Draft SEP for 2022-2025 was with CBG consultants at time of visit)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in December 2022)
July 2019_ 004	Security management	The HSEC briefing given to the IESC and Lenders did not include information about site evacuation in case of a major security issue.	All / PS4	CBG should strengthen its induction procedure(s) to ensure visitors are aware of the procedure to follow in case of a site evacuation.	Moderate	<b>Open</b> (site evacuation was not communicated during site visit safety briefing)
July 2019_ 018	Security provision by contractors	Currently, Sogea Satom (one of the MUA contractors), employs three security providers. The guards are not formally trained. Most guards come from the local communities and are not armed. This lack of training poses a risk to CBG.	All / PS4	CBG to review its supervision with respect to contractors and the hiring and deployment security providers to ensure that contractors' practice is aligned with CBG's own practice with respect to hiring and deployment of private security providers.	Minor	<b>Open</b> (Security guards are provided by SOTRAC (a TPE [small or medium-sized enterprise] established by CBG to provide speciality services to CBG) and IESC understands that they undergo the same training as other security providers. To be confirmed in the next site visit).
July 2019_ 032	Forthcoming compensation	Criteria for deciding on applicability of the 'streamlined compensation approach' or another resettlement planning tool are not clear.	Operations / PS5	Clarify criteria under which the 'streamlined compensation approach' is acceptable, agree these with IESC and Policy Lenders, and revise the Resettlement Policy Framework accordingly.	High	<b>Superseded</b> (See Dec 2022_044)

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed (IESC Opinion in December 2022)</b>
July 2019_ 039	Freshwater Fish Critical Habitat	Actions 197-201 of the BMS remain uncompleted despite them relating to a critical habitat issue and the requirement for them needing to be progressed having been discussed repeatedly since 2017.	PS6	Whilst it is acknowledged that the PbP approach aims to avoid impacts on all watercourses, these actions must be enacted immediately to provide the IESC with confidence that they can and will be fully addressed.	High	<b>Closed</b> (an outstanding study report received)
Dec 2018_ 001	Audit programme	The current audit and inspection procedure is dated Jan 2014 and was scheduled for review in 2016. It is unclear whether the review took place.	All	The procedure should be reviewed and updated, if necessary, to ensure it reflects current practice.	Minor	<b>Open</b>
Feb 2018_ 020	Security of tenure for Hamdallaye villagers	Provision of confidence to Hamdallaye villagers that they will not be relocated again.	Construction	Dissemination of reasons, to Hamdallaye residents and Advisory Committee, which explain why relocation will not occur again.  Recording of agreements (in the form of a meeting Minute ( <i>Procès Verbal</i> )).	Moderate	<b>Superseded</b> (See Dec 2022- 041)
Feb 2018_ 036	West African Red Colobus	The West African Red Colobus occurs on an island located between CBG's North Cogon concession and COBAD.	All / PS6	Make best endeavours to influence and support COBAD to implement appropriate mitigation measures to protect the habitat for this species.	Minor	<b>Closed</b> (measures to protect species captured in BMEP)

## **APPENDIX 4 STATUS OF ESAP ITEMS (AS OF JANUARY 2023)**



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

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

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

<b>12b</b>	E&S Management Plans	Water Management Plan draft.	31/01/2021	Final Water Management Plan	Closed
<b>12c</b>	E&S Management Plans	Updated Environmental Monitoring Programme	20 Business days after IESC/Policy Lenders sign off on Noise and Vibration Plan (Item 12a)	Updated Environmental Monitoring Programme	Open (under IESC review)
<b>12d</b>	E&S Management Plans	Local Content Plan	31/01/2021	Final Local Content Plan Signed off by IESC	Closed
<b>12e</b>	E&S Management Plans	Cultural Heritage Management Plan	N/A	Cultural Heritage Plan	Closed
<b>12f</b>	E&S Management Plans – Community Development Plan	Draft Community Development Plan. The Plan will include tailored information-sharing approaches and methodologies for disseminating the Plan to targeted communities.	16/06/2020	PDN with draft of amended Plan	Closed
		Review by external third-party consultant of this Community Development Plan. The review will focus on ensuring that CBG's community investment strategy is aligned with IFC best practice. Prepare Scope of Work	18/12/2020	After receiving the Consultant's Scope of Work.	Closed
		SoW for the review to be submitted to the consultant to be approved by Lenders on a 'no objection' basis.	1 Month from bid submission date	Approval on a 'no objection' basis.	Closed
		The Community Development Plan will be revised as necessary, following the review.	31/01/2022	Following the submission of the revised Community Development Plan.	Open

		The Community Development Plan will be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	10 business days after the IESC/Policy Lenders have approved the revised Community Development Plan	Evidence of disclosure	Open
<b>12g</b>	E&S Management Plans	Finalised Influx Management Plan.	15/03/2021	Final Influx Management Plan Signed off by IESC	Open (minor changes required – to be closed in January 2023)
<b>12h</b>	E&S Management Plans	Finalised Community Health and Safety Management Plan.	28/02/2021	Final Community Health and Safety Management Plan Signed off by IESC	Closed
<b>12i</b>	E&S Management Plans	Finalised Road and Rail Safety Management Plan.	30/04/2021	Final Road and Rail Safety Management Plan Signed off by IESC	Open (pending budget estimate)
<b>12j</b>	E&S Management Plans	Finalised Emergency Response Plan.	20/05/2021	Final Emergency Response Plan Signed off by IESC.	Closed
<b>13</b>	E&S Management Plans	i) Prepare an interim Air Quality Management Plan (AQMP) in accordance with the Scope of Work (Ref. AIR QUALITY Scope of Work ver 3). The Interim AQMP will be informed by the 2019 emissions data for Dryers 1-3 (and other sources) and dispersion modelling. The Interim AQMP will also propose stack emission limits and measures necessary to meet proposed limits and will include information on the necessary financial budgets to achieve the requirements within. Proposed emission limits will be agreed with Policy Lenders and the IESC.	(Subject of a waiver – in progress)	Interim AQMP	See below
		Update the interim AQMP to include consideration of Dryer 4 emissions and additional sampling data collected for Dryers 1-3/other sources as applicable and in accordance with the Scope of Work to produce a Final AQMP.	(Subject of a waiver – in progress)	A Final AQMP.	Open (pending completion of actions in AQMP Corrective Action Plan)

14	Worker Demobilization	<p>Prepare</p> <p>i) Worker Demobilization Plans and</p> <p>ii) subsequent Demobilization Close-out Reports, for future demobilization events, focusing on issues such as planning and monitoring procedures used to manage demobilization with emphasis on the process(es) used to notify workers of key demobilization dates, make and record final payments to workers and to manage grievances received and the procedures leading to grievances being closed out.</p> <p>iii) Demobilisation requirements should be communicated to contractors via the CBG Contractor Management Plan which should be updated accordingly.</p>	29/01/2021	<p>i) Worker Demobilization Plan</p> <p>ii) Demobilization Close Out Report</p> <p>iii) Communication to Contractors</p>	Closed
15	Pollution Prevention	Repair/upgrade the oil water separator located at the tank farm to achieve compliance with the applicable project standards. Design to be agreed with IESC.	31/12/2022 (Subject of a waiver)	Design Agreed for Pollution Prevention Upgrade/Repair works completed	Open
16	Community Mobility and Livelihoods	Develop a Scope of Work for an external consultancy and a Request for Proposals issued.	15/11/2020	SoW agreed	Closed
		Commission a study and report to be conducted by a suitably qualified consultant, on the impacts on mobility and road traffic flows (in urban areas) due to increased train movement frequency, including livelihood impacts resulting from alterations to mobility/traffic flows.	24/02/2021	Study commissioned	Closed
		The study report to include recommended measures to mitigate adverse impacts.	30/09/2021	Draft Study	Closed
		Based on the results of the study, CBG shall seek to agree with the Policy Lenders on mitigation measures to be implemented by CBG.	30/10/2021	Signed off by IESC and Policy Lenders	Open
		CBG to seek the approval of the MUOA User's Committee in accordance with Section 22 of the MUOA to address mitigation measures that need to be implemented (as agreed pursuant to (iv) above), including the roles and responsibilities of each of the parties with respect to such implementation.	30/10/2021	Signed off by IESC and Policy Lenders	Open

17	Past Compensation Report	Finalize the Past Compensation Report (2010-2015), with recommendations to improve livelihoods of PAPs, which integrates comments provided by the IESC and Policy Lenders. The recommendations will form the basis of an Action Plan to be implemented. This Plan will be included in the final Report.	31/10/2020	Completion of the Past Compensation Report including the Action Plan.	Closed
		The Past Compensation Report, including the Action Plan, will be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	22/01/2021	Evidence of disclosure.	Closed
18	Compensation and Resettlement Policy Framework (CRPF)	Finalize CRPF considering Lenders/IESC comments.	30/06/2021	Final CRPF Produced.	Open (pending sign off by IESC/ Policy Lenders)
		Approved CRPF to be disclosed publicly in a form to be agreed between CBG and the Policy Lenders.	10 business days after the IESC/Policy Lenders have approved CRPF.	Evidence of CRPF disclosure.	Open
19	Kankalaré RAP+LRP	Finalize Kankalaré Resettlement Action Plan (including a Livelihood Restoration Plan). CBG to send a Notification (accompanied with an updated fieldwork schedule), to Lenders, as soon as COVID-19 restrictions are lifted in a manner that allows the required fieldwork to be implemented.	05/03/2021	RAP and LRP	Open (ongoing iterative review)
20	Kankalaré Infrastructure Measures Completion	Provide interim and final report with photographic evidence of the finalization of infrastructure provision/improvement measures in relation to the Kankalaré PAPs' host communities. The measures are road to Parawi village, Telebofi footbridge over the railway; fencing along railway for the stretch where the railway passes beside Telebofi village; and iron-removal devices for wells.	30/11/2020	Interim Report with photographic evidence.	Closed
			31/12/2021	Final Report confirming all works completed.	Closed
21	Post 2016 Resettlement Independent Review	CBG to support the commissioning and execution of a third-party independent review of all land acquisition processes initiated from 01/01/2016 through to effective date of the CRPF (see item 18) and adequacy of related documentation. A Scope of Work to be prepared and approved by Lenders. This independent review will result in a Report focusing on compliance of land acquisition processes against the requirements of the 2016 RPF and PS 5. The Report will identify non-compliances and include a time-bound	31/01/2021	Budget Approval	Closed
			As per the time bound by the Corrective Action Plan	Completion of actions specified in Corrective Action Plan.	Open

		corrective action plan with budget to cover implementation. CBG to complete implementation of the Corrective Action Plan.			
22	Hamdallaye and Fassaly Foutabhé RAP	Prepare and implement a COVID-19 Plan for H2, 2020, with the key aim of ensuring that CECI resumes/increases activities, in agreement with the communities, as soon as possible while respecting governmental restrictions.	16/11/2020	COVID-19 Plan	Closed
23	Hamdallaye: Resettlement Housing and Infrastructure Repairs Action Plan	Prepare and implement a time-bound Action Plan for housing and infrastructure repairs and other additional works related to the Hamdallaye resettlement site.	30/11/2020	Action Plan	Closed
		Environmental Monitoring Programme to be amended to include sampling and analysis of Hamdallaye water supply. Analysis of data, and any corrective actions needed.	See Item 12c	Updated Environmental Monitoring Programme to include water sampling and analysis	Closed
		PAP satisfaction survey to be undertaken upon completion of repairs and works specified in the Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.	As per the time bound by the Corrective Action Plan	PAP Satisfaction Survey Results	Closed
24	Hamdallaye: Land Rehabilitation Action Plan	<p>Prepare (i) and implement a time-bound Action Plan, with biodiversity inputs, to implement the soil rehabilitation programme as per CBG's report (RAP Hamdallaye &amp; Fassaly Foutabhé: Project Status Report, 12 February 2020) including setting up a pilot field to build the capacity of the population on soil fertility management and finalizing the individual allocation of land (ii to iv) to the respective affected people as per the RAP. The Action Plan, also, to include specific rehabilitation measures for:</p> <ul style="list-style-type: none"> <li>- the replacement crop-growing land (56 ha);</li> <li>- all land to be used for land-based livelihood restoration activities; and</li> <li>- land for household gardens and fruit/shade trees.</li> </ul> <p>v) PAP satisfaction survey to be undertaken upon completion of measures specified in the Action Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.</p>	30/11/2020	A completed time-bound Action Plan.	Closed
			29/01/2021	<b>Initial</b> evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
			31/12/2021	<b>Interim</b> evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
			30/09/2023	<b>Final</b> evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Open

			Following implementation of the Action Plan	PAP Satisfaction Survey Results	Open
<b>25a</b>	Economic Displacement (SoW, Plateau LRP)	Prepare and submit scopes of work with respect to the Livelihood Restoration Plan (LRP) in the remaining sections of 25a below.	15/11/2020	Scope of Work	Closed
		Provide confirmation that a Livelihood Restoration Plan (LRP) is being or will be prepared for PAPs and submitted prior to people being displaced in N'dangara, Kagneka and Parawi by proposed mining activities and haul roads. CBG agrees that no additional land take causing displacement in N'dangara, Kagneka and Parawi will occur until the LRP has been approved by Lenders.	31/08/2020	Receipt of Confirmation	Closed
		Draft LRP to be submitted for Lender/IESC review.	1 month after receiving lender comments.	Draft and Final LRPs posted by the GFA	Open
<b>25b</b>	Economic displacement (i) Thiapkhoure LRP ii) Contingency Blocks LRP iii) IA for contingency blocks iv) closed	i) Prepare and submit an LRP with respect to PAPs already impacted by displacement in Thiapikouré. This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	15/06/2021	Draft and Final LRP.	Open
		ii) Prepare and submit an LRP for review and approval by the Lenders with respect to PAPs affected by land disturbance through the streamlined process (Bouroré 1a, 1b & Parawi 2a). This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	Draft 31/08/21 and then 1 month after receiving lender comments.	Draft and Final LRP.	Closed
		iii) As an interim measure, prepare and submit an impact assessment of the economic displacement, for Bouroré 1a, 1b & Parawi 2a, and identification of those PAPs that are most vulnerable and for which transitional support will be provided.	Draft 30/7/21 and then 1 month after receiving lender comments.	Draft and Final Impact Assessment.	Closed
		iv) Formal written commitment by CBG not to disturb land before any LRP is in place.	30/11/2020	Written Commitment	Closed

26	Biodiversity Action Plan	Develop a Biodiversity Action Plan (an update of Biodiversity Management System), including a Biodiversity Monitoring and Evaluation Plan, in alignment with revised Guidance Note 6 (to Performance Standard 6) including development of standard biodiversity metrics for no net loss (NNL)/net gain (NG) of biodiversity; update of estimates of significant residual effects and associated offset targets to considered following completion of the BMS review; presentation of interim targets for NNL/NG; and prioritization of on-site set aside.	22/04/2021	Finalised Biodiversity Action Plan.	Closed
		The BAP will be disclosed publicly, within 2 weeks of its completion, by CBG, in a form agreed between the Policy Lenders and CBG.	30/06/2021	Evidence of disclosure.	Closed
27	Rehabilitation - 5 Year Plan	Prepare a 5-year progressive rehabilitation plan, including resourcing of the biodiversity department, for full land restoration (budget and equipment) and staffing required.	05/06/2021	Final Rehabilitation - 5 Year Plan	Closed
28	Rehabilitation - Landscape Level Plan	Develop a landscape-level plan for the concession, building on the existing Plateau by Plateau (PbP) approach, that integrates community development and biodiversity objectives. The intent is to provide strategic guidance to location and focus of rehabilitation, community development, and on-site conservation activities. This plan will require collaboration with affected stakeholders including local governments, representatives of communities/civil society organisations and neighbouring mining companies.	30/04/2021	Agreed TOR for Landscape Plan	Closed
			2 months after approval of the TOR by Lenders	Consultant approved by Lenders.	Closed
		The completion of a final Landscape-Level Plan.	1 month following comments from Lenders	Final Rehabilitation - Landscape Level Plan	Open

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