



# Guinea Alumina Corporation Conakry, Republic of Guinea

## GAC PROJECT

### IESC Monitoring Report: Third Monitoring Site Visit Guinea - October 2019

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1	Second Issue	M Mackintosh; L Johnson; J Zorrilla; O Vannello	E. Napoli	G. Noli	28/01/2020
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## ABBREVIATIONS AND ACRONYMS

<b>AfDB</b>	African Development Bank
<b>BEN</b>	Bauxite Environmental Network
<b>BMEP</b>	Biodiversity Monitoring and Evaluation Plan
<b>BMP</b>	Biodiversity Management Plan
<b>CAGF</b>	FODEL Management Support Committee (Comite d'Appui a la Gestion de FODEL – CAGF)
<b>CASSM</b>	Company for Security Support of Mining Companies (Compagnie d' Appui à la Sécurité des Sociétés Minières),
<b>CBG</b>	Compagnie des Bauxites de Guinée,
<b>CBNRM</b>	Community-Based Natural Resources Management
<b>CE</b>	Critically Endangered (on IUCN Red List)
<b>CEO</b>	Chief Executive Officer
<b>CEFAD</b>	Centre for Training and Development Support
<b>CFP</b>	Centre for Professional Training (Boké)
<b>CHA</b>	Critical Habitat Assessment
<b>CIS</b>	Community Investment Strategy
<b>CLO</b>	Community Liaison Officer
<b>CMIS</b>	Special Intervention Mobile Company (Compagnie Mobile d'Intervention Spéciale)
<b>CPSES</b>	Prefectural Committee for Environmental and Social Monitoring (Comite Préfectoral de Suivi Environmental et Social)
<b>EBZ</b>	Environmental Buffer Zone
<b>EcoS</b>	Ecosystem Services
<b>EDC</b>	Export Development Canada
<b>EGA</b>	Emirates Global Aluminium PJSC
<b>EHS</b>	Environmental, Health and Safety
<b>EHSMS</b>	Environment, Health and Safety Management System
<b>EMP</b>	Environmental Management Plans
<b>ENAE-Koba</b>	National School of Agriculture and Livestock of Koba (École Nationale d' Agriculture et d'Élevage – Koba)
<b>EPC</b>	Engineering, Procurement and Construction
<b>EPRP</b>	Emergency Preparedness and Response Plan
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESMP</b>	Environmental and Social Management Plans
<b>ESHS</b>	Environmental, Social, Health & Safety
<b>FODEL</b>	Local Economic Development Fund (Fonds de Développement Economique Local - FODEL)
<b>FOOS</b>	First Ore On Ship
<b>GAC</b>	Guinea Alumina Corporation SA
<b>GIIP</b>	Good International Industry Practice
<b>GIS</b>	Geographic Information System
<b>GBV</b>	Gender Based Violence
<b>HC</b>	Human Capital
<b>HR</b>	Human Resources
<b>H&amp;S</b>	Health & Safety
<b>HSE</b>	Health, Safety and Environment
<b>IESC</b>	Independent Environmental and Social Consultant
<b>IFC</b>	International Finance Corporation

<b>IWMP</b>	Integrated water management plan
<b>KBA</b>	Key Biodiversity Area
<b>KCT</b>	Kamsar Container Terminal
<b>KPI</b>	Key Performance Indicators
<b>LACRF</b>	Land Acquisition, Compensation and Resettlement Framework
<b>MIGA</b>	Multilateral Investment Guarantee Agency
<b>MoU</b>	Memorandum of understanding
<b>NGO</b>	Non-Governmental Organisation
<b>NNL</b>	No Net Loss
<b>OHS</b>	Occupational health and Safety
<b>OS</b>	Operational Safeguard
<b>PAP</b>	Project Affected People
<b>PCBS</b>	Pre-Clearance Biodiversity Surveys
<b>PIIM</b>	Project Induced In-Migration
<b>PS</b>	Performance Standard
<b>QRF</b>	Quick Reaction Force
<b>RAP</b>	Resettlement Action Plan
<b>RO</b>	Reverse Osmosis
<b>SEIA</b>	Social and Environmental Impact Assessment
<b>SEP</b>	Stakeholder Engagement Plan
<b>SHE</b>	Safety, Health, Environment
<b>SHEC</b>	Safety, Health, Environment, and Community
<b>SMP</b>	Security Management Plan
<b>SMS</b>	Social Management System
<b>SOP</b>	Standard Operating Procedure
<b>SPV</b>	Special purpose vehicle
<b>SYDEV</b>	Synergies and Development (NGO)
<b>TBC</b>	The Biodiversity Consultancy
<b>TPI</b>	Technology Partners International
<b>UCOMB</b>	Unité de Cooperation pour l'Offset Moyen Bafing
<b>UNDP</b>	United Nations Development Programme
<b>USTG</b>	Union of Workers of Guinea ' <i>Union Syndicale des Travailleurs de Guinée</i> '
<b>WCF</b>	Wild Chimpanzee Foundation
<b>WHO</b>	World Health Organization
<b>WI</b>	Work Instruction
<b>WWTP</b>	Wastewater Treatment Plant

## EXECUTIVE SUMMARY

RINA Consulting S.p.A. (formally D'Appolonia), has been appointed to act as the Lenders' Independent Environmental and Social Consultant (IESC) to monitor the construction and operational phase of the Guinea Alumina Corporation (GAC) Project. The IESC scope is to assess compliance with the Environmental and Social Management Plan (ESAP) and the Environmental & Social Requirements of the Project during the life of the loan agreement and Multilateral Investment Guarantee Agency (MIGA) guarantee of the GAC 'Project'.

The Project includes the mining of bauxite within GAC's concession in the Boké province of Guinea, the operation of a port terminal with an offshore export berthing facility at Kamsar, and railway spurs connecting the bauxite mine and the port terminal to the existing railway system. The Project entered the start of Operations on the 30<sup>th</sup> July 2019, and is now ramping up the export program, completing the commissioning of all operations, and will be demobilising remaining construction contractors.

This report presents the IESC's findings from the third monitoring visit post financial close undertaken on the 28<sup>th</sup> October to 1<sup>st</sup> November 2019.

### SHEC<sup>1</sup> Management

The HSE and Community Relations Management structure is now largely formalised for operations and is understood to remain in essence the same as for the last IESC visit (May 2019). The Health, Safety & Environment (HSE) Director has overall responsibility and it is understood that he still has four main reports, namely the Project HSE Manager (Mine & Port), Operations Safety Manager (Mine), Operations Safety Superintendent (Port), and Environmental Manager, as well as the contracted health service provider (which is soon to be an in-house team) which covers both the port and the mine. The finalised operational organograms were not available at the time of the IESC visit, and will be reviewed when they are available. The General Director is also the Stakeholder Engagement Director, and has direct responsibility over all aspects of social management (See Social Section below).

Since the last IESC visit there has been the appointment of a new Biodiversity Specialist, who replaced the previous specialist who left in Feb/March 2019. This addressed the significant gap in the Biodiversity Team noted in the IESC's May 2019 visit – however 2 weeks subsequent to this October IESC visit, the IESC was advised that this new Biodiversity Specialist had resigned. The rest of the EHS team remains essentially unchanged. In the previous visit the IESC was informed that the departments of Corporate Affairs and Stakeholder Engagement had been merged under the direction of a Stakeholder Engagement Director. This decision has been reversed splitting the two departments and restructuring the Stakeholder Engagement Department on four strategic axes: Communication with Stakeholders, Mitigation of Operational Impacts on Communities, Grievance Management, and Local Economic Development. Two new full-time positions were created including a Grievance Manager and a Compliance and Risk Supervisor.

GAC remains committed to the development and implementation of a SHEC management system. The structural design of the Environmental, Health and Safety Management System (EHSMS) is considered to be good and meets Good International Industry Practice (GIIP) and the environmental component of the system is considered to be aligned with ISO 14001, and identifies the main risks and impacts. GAC reported that the operational plans are still being prepared as are some of the procedures and other documents (e.g. Standard Operating Procedures (SOPs) and Work Instructions (WIs)). The EHSMS will be interfaced with DTP's (the mining contractor) and VIVO's (fuel contractor) management systems. Based on the discussion held, and documents seen (which are now organised more consistently across the EHS disciplines, the IESC is reassured that the management system is progressing and will be fit for purpose. Also, based on the discussions held, the finalisation of this system does not present a significant EHS risk to the Project given the EHS team has remained consistent from construction through to operations. The full operational management system will then be reviewed by the IESC during the next monitoring visit in May 2020.

The Stakeholder Engagement Plan (SEP), the Land Acquisition, Compensation and Resettlement Framework (LACRF) and the Community Investment Strategy (CIS), are the core of community management and are aligned with the HSEC policy. Procedures to implement each component are in place, but structure and integration as a Social Management System (SMS) for operations needs to be improved to ensure consistent implementation, evaluation and continuous improvement. The SMS should be integrated to the EHSMS with clear linkages between both systems.

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<sup>1</sup> The document uses the term SHEC (Safety, Health, Environment, and Community) as used by GAC, which is equivalent to the traditional ESHS (Environment, Social, Health & Safety).

## Environment

Since the last IESC monitoring visit, GAC's Environment Team have completed inputting the monitoring data from their laboratory contractor Technology Partners Limited International (TPI) into the Borealis data base. They are now inputting ERM's historical baseline data. This is now being used to better track compliance, and querying data (e.g. impacts on water quality from the dam), which should enable GAC to critically evaluate data in the context of the overall project, and environmental/Biodiversity and community setting. The review and analysis of the Borealis data base during the IESC's visit demonstrated that this appeared to be a robust platform to use for the environmental and other data. This data can be linked to ARC-GIS, and also alerts for the responsible persons generated as appropriate. Now that TPI's contract has finished GAC is bringing the monitoring and laboratory functions in house, and should use this as an opportunity to undertake an evaluation of the monitoring strategy for the different media, and the locations of the monitoring points (for air, noise and vibration etc.) so that GAC maximises the benefit from the data gathered. As part of this review GAC has plans to install real-time monitoring of water level and flux on the major rivers in the Tinguilinta basin.

The Project has now moved into operations, although as it is in ramp up mode (and operations are being refined), the use of resources remains dynamic, and therefore, until operations stabilise, the current resource efficiency management remains largely focused on tracking a few significant parameters such as monthly fuel usage. Once the Project moves into more steady state operations, GAC should undertake more granular tracking of key performance indicators (KPIs) on resource efficiency such as fuel use per tonne of product exported. The tracking and checking of fuel usage by the different divisions, and balancing this with the fuel supplied through the VIVO fuel system, should be part of the Waste and Resources Supervisor's role under the Environment Manager. GAC will need to ensure there is sufficient granularity in the data collected to evaluate where improvements can be made, and have a system with suitable cross-references to assess accuracy. Out of this resource efficiency effort further KPIs can be developed.

GAC's first version of the Integrated Water Management Plan (IWMP), has been issued, and defines the potential water sourcing strategies available. This needs to be tied into the review of the water monitoring programme (including monitoring of water use), with the objective that the monitoring data informs and refines the IWMP assumptions, and provides data to the Project to assist the environment team assess the interaction of various parameters (e.g. rainfall and turbidity), inform management actions and decisions, as well as identify short and longer term trends which may affect the Project (e.g. changing rainfall patterns).

A number of the actions raised during the IESC's first and second monitoring visits have been closed, and there has been progress on others which remain open, the IESC does not have any specific concerns with the remaining open actions, although expects these to be closed in a timely manner (such as the installation of redesigned culverts to allow the drainage of the creek adjacent to the Platform). Following this IESC monitoring visit there are a number of new remedial actions as detailed in this report, which in general, are considered to be straightforward to implement, and the IESC will review the remedial actions during the next monitoring visit.

The new waste management facility is now operational, and the old facility has been largely cleared of waste. The Waste and Resources Supervisor is considered to be managing the area well, and is aiming to address poor waste segregation at source and other waste improvements, as well as seek further opportunities for recycling. It is expected that the intermediate waste management facility at the Platform will be installed in 2020, and this will also have an incinerator which will reduce the volumes of materials being transported from the Platform to the Tinguilinta waste management facility.

The detailed review of the Project's physical management of hazardous materials and pollution prevention indicates that overall this meets GIIP. The notable exception is the fuel and other hazardous material storage and management around the Tinguilinta camp generator, where there were a number of significant issues identified. Although it is recognised that this area is due to be refurbished, it should not be operated with so many structural and managerial non-compliances. GAC need to undertake a detail HSE audit, and put in place a remedial plan to effectively remove or mitigate the risks until the area is refurbished.

## Health and Safety

Through First Ore On Ship (FOOS) and into the start of operations health and safety (H&S) has continued to be given the same focus by top management and all morning meetings have a review of H&S at the start, and notice boards show performance. The monthly Safety Performance Review (seen for September 2019) includes H&S highlights themes and initiatives from the month. There continues to be a good focus on H&S statistics, and key aspects, such as the number of drugs and alcohol tests, or training courses undertaken. The SHE safety topic for September was to finish strong on SHE topics, and considered fall protection and electrical hazards. There have been zero Lost Time Injuries, Restricted Work Case or Medical Treatment Case for the month of September, and only two LTI for the year to date. Malaria rates through the wet season (since the last IESC visit) have been low (an

additional 28 on top of the 15 reported for the year to date in April) with 10 reported in the month of September. GAC continue to track the same nine leading safety indicators and 15 lagging indicators which were developed at the start of the construction phase. These are contained in GAC's Green Book, which is the monthly report to senior EGA management on the performance of the project, of which ESHS matters are a part.

An update to GAC's emergency preparedness and response plan (EPRP) reflecting the operational case, including tying into VIVO's EPRP for the fuel delivery and distribution has not been produced yet. The IESC will review this on the next monitoring visit. At the time of this visit, it was apparent that careful planning and preparations were being implemented in advance of the first VIVO bulk fuel delivery to the jetty, and the IESC has no concerns in regard to emergency response procedures based on the observations and conversations held.

There were no significant issues reported or identified on traffic management and safety. GAC has initiated a task force to assess community access routes around the mining areas, and evaluate how it either diverts these or makes crossings (e.g. of haul roads) safer.

### Biodiversity

A new Biodiversity Specialist joined GAC in September and had completed one 6-week rotation by the time of the IESC visit. Unfortunately, two weeks following the IESC visit, the Specialist resigned, and GAC is back seeking a replacement. Therefore, as previously, the two-person Biodiversity Team is under-resourced, again without a mentor or senior specialist. There are significant difficulties currently in sourcing suitably qualified, internationally experienced biodiversity specialists in the Guinean mining sector. The two remaining Biodiversity Team members provide continuity to the biodiversity program implementation and continue to perform their duties well. However, Lenders should be aware there is the potential for substantial risks to the effective implementation of GAC's biodiversity management program with the ongoing lack of senior specialist personnel. Increasing the overall capability and resilience of the team responsible for implementing the biodiversity program should be a high priority for GAC senior management

The IESC has drafted a first attempt at a summary status update on the implementation of the general control measures contained within Biodiversity Management Plan (2017). A written set of updates was developed by GAC's Biodiversity Specialist, and although not complete, was a good start in identifying progress against each of the general BMP commitments. Although the status update doesn't tie in every requirement stipulated in the BMP, it does indicate that GAC has been addressing a number of activity areas, although gaps remain. The review of BMP general control measures needs to also include species-specific control measures as detailed in the BMP.

The updated Environmental Buffer Zones (intended to protect priority biodiversity features) are now fully integrated into the mine planning GIS system. GAC has developed their Land Disturbance Management Procedure which details the necessary steps for mine engineers to receive a permit sanctioning land clearance (basically operationalising the disturbance process included in the BMP App.4).

The IESC has requested ecological information on the proposed 'rock storage' location however nothing had been received by the time of writing this report. The IESC visited the edge of the proposed area and was advised that internal sanction through the land disturbance procedure has not yet been provided due to a missing method statement from the operation. The IESC is not yet aware of any alternatives analysis that might have been undertaken to comparatively assess alternative locations.

The Mine Closure and Rehabilitation Plan is now finalised. The IESC observed good progress in new and previous areas of rehabilitation and active revegetation, and is awaiting figures on number of hectares revegetated since the last visit as July/August is the prime planting period due to the rainy season. There were some hold-ups due to the required tender process held to find the best nursery service provider. EPA nursery, the existing provider, retained the contract, and was able to supply sufficient seedlings for GAC's needs across both the mine and port. GAC intend to move away from the EPA nursery and establish a GAC centralised community nursery as part of a wider community agricultural demonstration project. The program is currently under development, and the IESC has requested that Lenders are advised how communities across the concession might still benefit from the localised nurseries nearest to mine rehabilitation areas, as per the original intention.

GAC has developed a Request for Proposals for the purposes of establishing a system of quality condition scores for habitats at the mine site. This will also analyse land use change 2017-2018.

GAC has made significant effort in trying to find a partnering organisation to review the mangrove offset restoration undertaken and develop a fit-for-purpose offset program to achieve the required gains. A representative from University of the Sunshine Coast, Australia was found via the University of Exeter in the UK, and the first site visit is scheduled for late November 2019. Regarding the Moyen Bafing offset, a presentation was provided on the structure and purpose of UCOMB (*Unité de Coopération pour l'Offset Moyen Bafing*), the entity created by GAC

and CBG (*Compagnie des Bauxites de Guinée*) to facilitate/control funds and monitor contractual compliance. RINA is in negotiations to undertake the independent monitoring of the Moyen Bafing offset.

The recently departed Biodiversity Specialist had been in the process of revitalising a monitoring program for GAC that was intended to align with the Lender-approved Biodiversity Monitoring and Evaluation Programme (BMEP) – this was not completed. A calendar of monitoring work has been provided, but it is not currently clear now to what extent it will be implemented, or how fully it will reflect the activities required in the BMEP. Although there is some progress, the IESC flags this as a non-conformance as Lenders are not able to tell how well GAC's mitigation measures are avoiding or minimising impacts on biodiversity, through Construction or early Operation. The IESC encourage GAC to continue to assess how the BMEP should be implemented, resourced, and feed into adaptive management.

The Chimpanzee Study peer review (to independently assess the methodologies applied and analysis of results) has not yet commenced, and the Request for Proposals is being developed. The Biodiversity Team have been considering the optimum onsite set-aside and the current preference is for Boullere with a corridor linking the Key Biodiversity Area (KBA) to the forest areas along the north-west of the reservoir. The outputs from the recently concluded SYDEV (*Synergies & Développement*) community-based natural resource program of work indicate the Boullere area in particular would lend itself well to onsite protection through set-aside. The IESC has encouraged GAC to seek specialist input to ensure that the necessary gains might best be achieved (e.g. for restricted range species and potentially the red colobus i.e. the original targets of an onsite set-aside) and for GAC to develop a set-aside program proposal for discussion with Lenders.

During site discussions at the dam, there was speculation as to whether decaying submerged vegetation might cause eutrophication and algal blooms. Following the visit to the dam, the IESC and GAC analysed the monitoring data in Borealis and concludes that the BOD data provided does not show any statistically significant issues (see Section 4.2.2). GAC should continue to monitor BOD and related parameters carefully to pick up any early indications that eutrophication is occurring and take actions to address any implications for the ecological health of the reservoir, and the downstream Tiouladiwol river. GAC also mentioned that a feasibility study for establishing fish-farming in the reservoir was being discussed – the IESC strongly recommends that a comprehensive assessment of impacts of this proposal be undertaken, including a specific investigation into the ecological consequences by suitably experienced freshwater ecology technical specialists. Such a study should also be mindful of the potentially significant consequences of encouraging increased access to the area that might otherwise be preserved as part of GACs set-aside.

The SYDEV program has delivered a Technical Program Summary Report and two separate Natural Resource Management Plans for both Boullere and Dambantchian. The IESC considers the SYDEV program as presented to have been hugely beneficial in building capacity and engaging biodiversity/ecosystem services-relevant stakeholders in the vicinity of the concession. The program has allowed GAC to develop a multi-faceted understanding of both the community value and optimal management of natural resources. These learnings and techniques should be considered for implementation across the northern and southern concession, engaging with communities well in advance of mine plan scheduling. GAC has advised that although the SYDEV program has provided valuable information and established positive relationships on GAC's behalf, the Project is planning to strategically review how they should approach Community Based Natural Resource Management (CBNRM) across the concession. GAC advises that SYDEV may no longer be the primary enabling organisation but may potentially continue to play a role in CBNRM implementation. GAC is aware that expectations have been raised amongst communities and newly trained Para-Technicians. The IESC recommends GAC maintain dialogue with Lenders in the short term as this CBNRM program is expanded and enhanced across the concession to ensure they are informed of GACs next steps in this vital area of work.

GAC has advised that to encourage a more holistic working relationship between the Biodiversity Team and the Communities/Stakeholder Engagement Team, issues related to natural resources and ecosystem services will now be a specific focus area at the senior management level 'SteerCo' meetings.

GAC reported that the BEN (Bauxite Environmental Network) has lost some momentum since GAC left the chair's role, although a Request for Proposals will shortly be issued for marine monitoring. There is no GAC marine monitoring being undertaken at present.

Freshwater flow and quality monitoring is now in place, and the Integrated Water Management Plan has been reviewed and recommendations made (see Section 4.2.2) – one being that the flow from the dam be reduced to more closely mirror the ephemeral nature of the Tiouladiwol as it was prior to dam construction, plus the water-saving benefits to be derived from GAC's significant increasing their use of (non-toxic) dust suppressant additives. At present GAC only use water from the reservoir for dust suppression rather than extracting from the Tinguilinta River.

Invasive species management has been affected by the delay in award of contract to EPA as noted above under revegetation. Data on the areas of active weed management, priority and challenging species, and any changes in weed diversity/density/distribution were requested but not available at the time of writing. The Invasive Species Management Plan and program should be reviewed and made sure it is addressing the risks that GAC currently face at the port and mine sites, especially in light of the increased acreage of bare ground available for opportune species to take hold.

There was insufficient time whilst on site to fully discuss GAC's implementation of the biodiversity management program, and additional time is necessary for the IESC to gauge conformance with Lender requirements.

### Labour Management

Labour and working conditions are managed by an adequate team under the new Director of Human Capital (HC), who reports to the CEO, and has 14 staff divided in four areas: Learning and Development, Recruitment and Onboarding, Business Partners, and Payroll and Administration. Aspects related to working and labour conditions of the construction contractors are overseen by the Project Director. In addition, the Compliance team supports the management of workers' grievances. As of September 2019, the project had 3,546 employees, including contracted workforce, 460 less than in April. GAC continues to consider the demobilisation as one of the main risks at this stage of the project. From the start of the project, 6,878 workers had been demobilised by October 2019. From May to November 2018, close to 2,500 workers were demobilised. The demobilisation process has been adjusted and improved and is aligned with lenders requirements. In the last year GAC direct employees have increased from 268 to 407 with 331 Guineans and 76 expats. The number of direct employees is expected to be stable for the operational phase, but the proportion of Guinean Nationals is expected to continue increasing through the implementation of a Guineanization Plan.

In July, GAC reached a collective agreement with the Union of Workers of Guinea (*Union Syndicale des Travailleurs de Guinee* – USTG). The new agreement is valid for two years. The agreement is reflected in the new Internal Regulations approved and in implementation since July 31. GAC continues to meet formally with union representatives every three months and on a regular basis to address day-to-day concerns.

The contractors' workforce is not unionized. GAC supervises working and labour conditions of contractors. In the first ten months of 2019, there have been 11 worker-led project blockages causing project delays. All 11 blockages were conducted in the first six months of the year showing an improvement in workers relations in the last four months.

Women participation in GAC workforce continues to fall from approximately 15% in November 2018 to 13% in April and currently stands at about 10%. For contractors the percentage of women in the workforce continues to be well under 10%. GAC has not been implementing the internal actions of the Gender Strategy to increase women participation in the workforce. Information provided in the May site visit indicated that there may be a level of sexual harassment and potentially other forms of Gender Based Violence (GBV) in the company that go unreported. GAC needs to ensure implementation of the Gender Strategy to increase women participation in equal conditions and to reduce the risk of GBV and other types of harassments.

GAC reported having received 40 grievances year to date through the compliance system, four of which are yet to be resolved. Three grievances were related to labour harassment or lack of respect towards workers. HC reported that seven grievances were registered in their internal system from May to October 2019, all of them resolved. Most grievances were related to relocation premiums, while two were related to false accusations and disclosure of confidential information. Grievances reported were received through different channels including verbally through HC, emails, through supervisors, and through the EGA compliance mechanism. Although this is positive as it indicates that HC is now registering verbal grievances and that some information is shared between HC and Compliance, conflicting information indicates that additional efforts need to be done in order to consolidate the workers grievance mechanism. Furthermore, it was informed that HC, Industrial Relations and Compliance communicate as needed to ensure every grievance is addressed and resolved; however, there is no evidence that there is a coordinated effort to integrate management and analysis of workers grievances. GAC needs to review its workers grievance mechanisms to ensure all workers grievances are registered and consolidated in order to document and be able to analyse issues and trends to be in a better position for early detection and correction of possible issues. GAC is also encouraged to install "suggestion boxes" in workers' high transit areas to provide another channel through which they can log confidential grievances.

### Social Management

In early 2019 the Stakeholder Engagement was integrated with the Corporate Affairs department under one director. In mid-2019, these departments were again split in two departments. The General Director is now also the Stakeholder Engagement Director and is directly responsible for management of social aspects of the GAC

operations. The Stakeholder Engagement Department was restructured and is organized along four strategic axes: Communication with Stakeholders, Mitigation of Operational Impacts on Communities, Grievance Management, and Local Economic Development, under the supervision of the Community Manager, who reports to the General Director and Stakeholder Engagement Director. The department has a total of 27 staff and one vacant position for a Livelihood Restoration Supervisor. In addition, 24 people are hired on a contract basis, including the Social Investment Manager, 13 Community Relays<sup>2</sup>, and 10 consultants supporting resettlement and compensation.

The Stakeholder Engagement team is working at full capacity to maintain information disclosure and consultation with the communities, implementing livelihood and community investment projects, managing resettlement and compensation, grievances and social incidents/conflicts. GAC has increased the resources in the Stakeholder Engagement department by permanently hiring one person formerly on contract and adding a position. However, delays have occurred in the development and implementation of the RAPs. The Stakeholder Engagement team would benefit from training of all approved procedures to ensure their adequate implementation.

The Stakeholder Engagement Plan (SEP), the Land Acquisition, Compensation and Resettlement Framework (LACRF) and the Community Investment Strategy (CIS), are the core of Community management and are aligned with the SHEC policy. Procedures to implement each component are in place, but structure and integration as a Social Management System (SMS) for operations needs to be improved to ensure consistent implementation, evaluation and continuous improvement. The SMS should be integrated to the EHSMS with clear linkages between both systems.

The SEP for operations has been finalized and is under implementation, while GAC is in the process of updating CIS for the operations phase and continues to implement community development projects based on the previous CIS. Social investment projects are implemented in partnership with Non-Governmental Organisations (NGOs) both in the mine area and in Kamsar. As per agreements of mining companies negotiated with the government, GAC will transfer 0.5% of revenues to local communities through the Local Economic Development Fund (*Fonds de Développement Economique Local* - FODEL).

GAC has identified Gender Equality as one its focuses, aligned with the UN Sustainable Development Goals and is implementing the external actions of its Gender Strategy. When possible and appropriate, GAC engages with women and men separately and promotes women representation in resettlement and other stakeholder engagement activities. GAC has shown its commitment to addressing gender issues at the community level by incorporating specific actions in the revised SEP, aligning with the gender strategy, supporting women economic development through social investment, and focusing on the empowerment of women through the design and implementation of sensitization programs, and non-income generating community development initiatives as part of the GAC-IFC partnership action plan. However, women continue to be underrepresented in many engagements and committees, and positive results are not always evident. GAC has also identified the need to implement a gender sensitization campaign on violence against women, yet to be developed.

From May to October, GAC reported 13 blockages affecting the project due to social and labour issues, five less than during the first four months of the year. Five were worker-led stoppages, and eight were led by affected communities protesting for environmental impacts, resettlement, compensation and construction. One blockage turned violent resulting on damages to GAC property and the arrest of 16 members of the community Taïgbé. GAC will develop a plan to improve communications with the community of Taïgbé to and to improve the relationship. As a result of the incident, GAC has reinforced the security fencing, added security lighting, cleared the perimeter of the facilities for vehicle patrolling, established an agreement with the Gendarmerie to deploy assets to the access points, and is in the process of creating a convention with the government Quick Reaction Force (QRF) to be on standby in the city of Kamsar.

In January 2019 GAC signed a Memorandum of Understanding (MoU) with the Ministry of Mines describing how public security forces will be engaged through the Company for Security Support of Mining Companies (*Compagnie d'Apui à la Sécurité des Sociétés Minières* - CASSM), The MoU and protocol for engagement of public security forces is mostly adequate, and is being revised to clarify and strengthen alignment with GAC security policies. The security management plan needs to be revised considering the latest updates to security risk assessments and to security arrangements.

In terms of community safety, GAC continues to implement the traffic and vehicle management plan and provides road safety training to communities in the concession area and along the corridor between the mine and the port. Within the mining areas, GAC has identified community access routes as a key challenge and safety community risk. A task force has been set up to undertake a detailed assessment of the community access routes, categorising

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<sup>2</sup> Term used by GAC for what is referred commonly as Community Liaison Officers (CLO): people from local villages hired by the company to support engagement

them as Primary (used by cars/motorbikes), Secondary (cycle access), or Tertiary (pedestrian access to field etc.). The task force will assess options for making road conditions safer. Given the substantial increase in rail operations, the fleet and road risk management strategy for the communities includes carrying out an assessment of rail risks. A rail and road safety strategy document is expected to be available early 2020.

The dam and at the water pipeline river crossing represent a risk to community safety. Adjacent areas are used for palm oil production and it is expected that community members fish in the dam. GAC reported that awareness and training has been provided to community members to reduce safety risks associated with the dam and river crossing; however, signs and physical barriers to prevent access to the pipeline crossing are yet to be installed.

GAC continues working closely with 10 priority communities in the area of influence, raising awareness of migration issues, providing training, and supporting capacity development of village Migration Management Committees. These communities, with the support of GAC, have developed and are adopting rules of conduct with the objective of allowing immigrants and natives to coexist. In addition, meetings were held with each of the communities and the Influx Management Communal Committees of Sangerédi and Tanènè to support the development of guidelines and action plans for migratory flow management.

GAC has completed most resettlement commitments in the concession and the port area, including the construction of mosques and schools in Filima and Béli Kindy, establishment of market gardens in both resettlement sites, and built a community centre, a health centre and a market in Béli Kindy. Repairs to houses at both sites have been concluded and solar panels have been installed in Béli Kindy.

GAC deviated from the Resettlement Action Plan (RAP) for the resettlement of artisans from Dapress due, in part, to unexpected circumstances outside the control of the company. In order to ensure the objectives of the RAP are fulfilled and to comply with lenders requirements, GAC conducted a socioeconomic study to assess the situation of all affected artisans. The study proposes several measures to help artisans restore their livelihoods, with a focus on the most vulnerable. GAC is in the process of analysing the alternatives and will develop a plan to ensure artisans have the means to restore their livelihoods.

In both Béli Kindy and Filima, communities appear to continue having problems organizing to maintain water wells and stormwater gutters, and to manage solid waste. GAC should consider providing support to both resettled communities to organize themselves to deal with the maintenance of community assets such as the water wells and stormwater gutters and for waste management. According to members of the community of Filima the water quality of the wells provided by GAC has deteriorated. GAC should monitor the water quality and quantity in the resettled communities to determine if water quality and quantity is adequate for community use. The community is now requesting the authorities to provide water to the community. GAC could approach the authorities in support of the community to facilitate the installation of water system in the community.

Due to a review of the risk analysis of the dam, it was decided to resettle the community of Sinthiourou Thiouladji. GAC has developed the RAP for the 22 households with a total of 195 people that will be resettled to higher grounds a short distance from the village current location, outside of the flood risk area. GAC has also developed the RAP for the proposed rock storage area. Twenty land parcels used by 24 people in close to 75 hectares will be affected, including 39 hectares of farmed land and 35 hectares of fallow land.

In June GAC initiated the process to develop a RAP for the mine expansion in the north and centre portions of Plateau 20. The inventory of assets of 55 affected people was completed in July. At that time the cut-off date was established, and affected people were asked not to access their land starting at that time. Four months later the affected people had not been compensated and had lost their crops. GAC has initiated the process to pay compensation immediately, prior the development of the RAP. The RAP will incorporate an assessment of the impacts to affected people for not allowing them to access their land the delays on the payment of compensation. Based on the assessment, GAC will supplement compensate and/or implement additional livelihood restoration measures.

GAC has continued to engage with fishers and has started implementing measures described in the RAP related to fishers' safety, including sensitization sessions for fishers in seven artisanal ports. GAC has conducted a census of fishers to understand potential impacts and implement measures in accordance to the Kamsar RAP. Based on the census, GAC will be distributing 500 Personal Flotation Devices.

In accordance with the RAPs and aligned with lenders requirements, compensation for community land is provided in community projects rather than cash. Through negotiations with the communities and the prefecture, a model to prioritize and implement community projects was established. Community infrastructure projects have been completed or are under construction in all 11 affected villages. Projects included schools, mosques, sanitation facilities and water wells among others.

In October 2018, 67 individuals commenced legal proceedings seeking compensation for market gardens in Filima and damages. The basis of the lawsuit is the lack of adequate compensation proposed by GAC. Compensation rates in 2017 were revised to correct mistakes done with the application of the exchange rate resulting on lower

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eligibility amounts than in 2016. In May 2019 the lower court of Boké ruled in favour of the plaintiffs and ordered GAC to pay the requested amount. GAC has filed an appeal. The affected people have not been displaced, and GAC may not require the use of the affected area. GAC needs to confirm if there were any actual impacts to the market gardens and if the project will need access to the affected area for the expansion of the resettlement site. GAC has also committed to keeping the Lenders informed of the situation and notify of the outcome of the appeal decision when it is received, as well as GAC's strategy going forward.

Since the last site visit, GAC has conducted four induction and training sessions on cultural management, and has visited the sites that are planned to be accessed and potentially affected in Plateaus 20 and 26. There are fourteen heritage sites identified in Plateaus 20 and 26 and DTP platform. Identified sites are mapped and managed in accordance with the Cultural Heritage management plan. Two cultural sites in the DTP platform area have already been displaced following GAC's cultural heritage protocol and local customs. No identified cultural heritage sites are within the proposed rock storage area.

ESAP STATUS TABLE (Update of Active Items on ESAP May 2019)

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update Nov 2019
<b>PS1 Assessment and Management of Environmental and Social Risks and Impacts – Management System</b>									
M0001/17	1	D1.3 1.6.2; 4.1.5	<i>The draft SEIA (December 2016) for the railway upgrades provided largely meets lender requirements.</i>  <i>However, additional clarifications, assessments, and management actions, were identified as being required to address the gaps in the SEIA. GAC through its involvement in the project implementation is working to have these addressed. The success in addressing these gaps, and ensuring the continued focus of the lender requirements in the project documentation and implementation will require strong management commitment from GAC.</i>	<i>GAC to confirm the position and roles of individuals with responsibility for working with CFB on ESHS aspects and ensuring the continued focus of the lender requirements in the project documentation and implementation.</i>	<i>Before Operations</i>	<i>Organisational chart showing GAC-CFB management linkage and description of the roles and responsibilities of GAC members</i>			<b>CLOSED</b>  IESC understands that GAC is taking as proactive approach to this and within the limits of its roles and influence. IESC will continue to monitor but consider closed.
M0004/17	4	D1.6.1; 1.6.3;	<i>The Emergency Prevention and Response Plan (EPRP) is limited in its extent and is largely inward looking other than the cross reference to security plans. The EPRP should include details on the main components and consideration of the different risks in construction and operation.</i>  <i>The EPRP does not include any requirement for, or details on how to, interface with community authorities. To meet Lenders standards, measures to support communities in responding to an emergency are necessary.</i>	<i>Refine EPRP and define project facilities and emergency situations to be addressed, incorporating lender guidelines.</i>  <i>Define potential situations having impacts, and extent of communities and individuals subject to potential impacts. Consult communities so that their views and concerns are incorporated in the plan.</i>  <i>Assess the capabilities of communities, government agencies and related parties to respond to emergencies at the mine and port, and identify what active community/local authority role(s) in preparing for and responding to emergencies associated with the project are necessary. Identify notification, communication, and support measures to</i>	<i>Before Financial Close</i>	<i>Revised EPRP</i>	<i>GAC EPRP process_v1.docx Emergency Response Scenarios_ALL_14Dec2017.pptx  Emergency ResGAC DAM EMP draft-EN-V1-20171224.docx 0254472 GAC Dam Breach report 20150325.docx  GAC_Crisis Management_Guidebook_v20170908.pdf  GAC_Crisis Management Manual.docx  Loi_Gestion_Catastrophe.docx Plan_National_Gestion_Catastrophes_1994.docx</i>	<i>Progress</i>  <i>In</i>  <i>A considerable amount of work has been done over the last two months on all aspects related to Emergency Preparedness and Response Plan to align with the Risk register (including Community Risks). There is however still some work left at the after the resettlement is completed in Kamsar in order to properly engage with communities.</i>	<b>ACCEPTABLE</b>  The IESC considers that there remains work to do but this is as expected as the project transitions from construction to operations - specific areas to be reviewed on the next monitoring visit include assessment of the updated EPRP and the extent to which it covers the dam and also operations (such as the fuel transfer and spill response planning) and addresses the current lack of discussion of the interface with the communities within the EPRP.

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update Nov 2019
				include local authorities in the plan.					
<b>Assessment and Management of Environmental and Social Risks and Impacts – Stakeholder Requirements</b>									
<b>PS2 Labour and Working Conditions</b>									
<b>PS3 Resource Efficiency and Pollution Prevention</b>									
R0001/17	13	D3.1.1  3.1.2  6.1.2B	<p>The IESC considers that the integrated water management plan (IWMP) (31<sup>st</sup> March 2017) adequately addressed the majority of water management for GAC based on information available at that time, although it did not consider whether the use of dust suppressing binders could have mitigated the requirement for, or reduced the size of, the planned dam.</p> <p>New data is now available which influences the assumptions and conclusions of the IWMP, and a revision is required.</p> <p>The IWMP for the reservoir area needs to better define requirements to ensure protection and conservation of downstream biodiversity</p>	<p>GAC to evaluate all opportunities to minimise water use, and reduce environmental (including dust suppression) and social impacts.</p> <p>As part of this GAC to update the IWMP for the project to include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The results of the groundwater testing and whether supplementing the water supply from groundwater is a feasible option.</li> <li><input type="checkbox"/> Add detail on the decision process GAC is to follow to trigger the move from river to dam water supply.</li> <li><input type="checkbox"/> include the ESIA requirement for monitoring water flow on a daily basis downstream of the dam, and reconfirm the minimum flow appropriate to avoid freshwater ecological impacts downstream of the dam</li> <li><input type="checkbox"/> Discussion of, and assessment of the implications of, the volume of water available for dust suppression captured within the sedimentation ponds, as described in SRK report</li> </ul>	Before Operations	Updated IWMP Plan	IWMP dated 31 July 2019		<p><b>CLOSED</b></p> <p>The IWMP has been completed and shared with the IESC.</p>

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update Nov 2019
R0002/17	14		Water monitoring by GAC is limited to some aspects of water use, there is no detail water monitoring plan which is required for GAC to be able to monitor its water use, the natural water levels/flows, etc.	GAC to develop and implement a comprehensive water monitoring programme based on the key aspects of the IWMP and the water features (surface and groundwater) in the area. This should include selected headwaters around the plateaus. GAC should capture the monitoring data within an appropriate data bases to allow data interrogation, and assessment of temporal changes.	Before Operations	Details Water Monitoring and Management Plan			Water Monitoring and Management Plan – This remains under development. The new Environmental Superintendent understands the issues and is currently transferring all TPI data to Borealis and will be reviewing the current monitoring and assisting develop the future plans. It will require effort from GAC to establish a better monitoring network which is robust enough to withstand floods and provides information which can inform management decisions. Critically this should also tie in with freshwater ecological aspects of the BMP & BMEP given the presence of aquatic critical habitat species.
R0003/17	15	D3.1.1 3.1.2	<i>The IWMP is a valuable management tool to increase water efficiency, the water model within the IWMP will need to be revisited and updated on a regular basis as new monitoring data becomes available.</i>	<i>Once sufficient monitoring data is available on water use GAC is to further calibrate the water model assumptions. This will include calibration of the model based on season surface water flow monitoring, water capture, and water use. Based on the results of this update the water management plan (including evaluating the key decision points on when GAC moves from one water source to another).</i>	<i>Within one year of operations starting</i>	<i>Updated Project Water Model and Water Monitoring and Management Plans</i>			<b>CLOSED</b> See ESAP item 13/14 for update on progress. The approach to the use of monitoring data in the context of the IWMP will be assessed during the IESC's next visit in June 2018 under ESAP items 13/14.
R0005/17	17	D3.2.2	Air model impacts were assessed in SEIA Addendum based on generic assumptions regarding equipment and operations. This may not be reflective of the impacts	GAC to have the air model re-run once the equipment is confirmed and include an evaluation of whether the sensitivity of human receptors in the SEIA	Prior to start of Operations	Air modelling report update/addendum, and air quality monitoring and management plan			Air Modelling Report update/addendum, and air quality monitoring and management plan - GAC report that the ToR has been produced and has been sent out for bidding.

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update Nov 2019
			likely to arise from the planned equipment and operations. The SEIA Addendum also includes the assumptions that humans have a medium sensitivity, and that 50% reductions in emissions can be achieved through water suppression or 95% through chemical dust suppression, and no justification of these assumptions is provided.	Addendum (set at medium) is correct, and provide justification for the assumptions on expected emission reductions used in the mitigation scenarios.					This Air Quality Model will be reviewed during the next monitoring visit in October 2019.
R0006/17	18	D3.2.4	The fuel handling on the GAC Port Platform appears to be designed to minimise spills and provides suitable containment and spill response capabilities. The final design and management plans will need to include detailed consideration of leak detection procedures and protection of the transfer pipelines (e.g. from accidents or fuel theft) to minimise the potential for releases and contamination of soils, groundwater and surface water (and therefore impact the mangroves and fisheries).	GAC to review fuel handling procedures and ensure that these contain specific procedures to minimise the risk of a release, such as the testing of transfer lines before use, and the monitoring of pressures during fuel transfers.	Prior to start of Operations	Detailed fuel handling procedure(s)			The detailed fuel handling procedure(s) from VIVO is a condition of their contract and has yet to be provided. IESC anticipates that this document will be available for review on next monitoring visit in October 2019. Assuming the documentation discussed has been prepared and rolled out this will be closed.
R0007/17	19	D3.2.6	<i>The construction of the dam will require the excavation of borrow pits some of which will be substantial in size, however, no details are available on the design or management of these borrow pits, or their restoration.</i>	<i>Borrow Pit Management and Restoration Plan will be developed by GAC (through its contractor COLAS) including details on the location and design of the borrow pits and mitigation measures to avoid or minimise ESHS impacts, including control of sediment erosion, and restoration plans.</i>	<i>Prior to the start of dam construction</i>	<i>Borrow Pit Management and Restoration Plan</i>			<b>CLOSED</b> GAC has instigated the Activity Based Environmental Method Statement (ABEMS) which is required to demonstrate that any land disturbance considers the impacts and restoration. The outcome of this is an Environmental and Social Work Release Permit.  The IESC will continue to assess the effectiveness of this system and compliance with the restoration requirements during the June 2019 monitoring visit, in conjunction with the recommendations for the development of a strategic plan for all future land acquisition needed by the Project.

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R0008/17	20	D3.2.6	The expansion of GAC's quarry is required to provide the ballast for the railway, and other hard stone needs, however, no details are available on the design or management of this feature, or its restoration.	Quarry Management Plan will be developed by GAC (through its contractor COLAS) including details of the design of this quarry, applicable management systems, including control of sediment erosion, and restoration plans.	Prior to the start of operations	Quarry Management Plan			<p><b>CLOSED</b></p> <p>The IESC visited the active hard rock quarry and noted that the operations had ceased, and quarry was in a dormant state. The exploitation had been managed through an 'Environmental Baseline Site Assessment' (EBSA) which set out the management and closure (temporary), and based on the observations and discussions this appeared to have been followed. The issue is considered to be closed.</p> <p>It is envisaged that this quarry will likely become operational again in the future and an update to EBSA will be required to revisit and confirm the management and mitigation approach remains appropriate.</p>
R0010/17	22	D3.2.9	As there is not a suitably designed and permitted landfill available to the Project in Guinea, GAC intend to construct a Project landfill at the mine site.	GAC will provide details of the landfill design, specifically around the design standards and how issues such as leachate will be managed through operations and in closure.	Prior to landfill construction	Report detailing the planned landfill design.			<p><b>CLOSED</b></p> <p>IESC understands that GAC's aim is not to have a landfill on the project, but to seek to recycle or incinerate all wastes. Should this change this ESAP item will be re-opened.</p>
R0011/17	23	D3.2.10	The final design or location of the landfill at the mine site is not yet developed, nor is the operational procedures which will be implemented to manage the risks from vermin and/or human scavenging of the landfill for recycling or opportunist finds.	GAC will evaluate the key risks from the landfill for the environmental and human health and safety, and develop appropriate mitigation and management measures (including security) for management of the landfill through operations and closure.	Prior to landfill construction	Landfill management plan and procedures			<p><b>CLOSED</b></p> <p>See comment above on ESAP item 22</p>
R0012/17	24	D3.2.12	The use of bio-solids for beneficial uses such as mine rehabilitation and agricultural land improvements are considered appropriate if done with management oversight to reduce risks. Although bio-solid volumes are likely to be limited, they will be substantial over the life of mine. They need to be classified appropriately and if deemed not to be hazardous then they	GAC will develop a suitable procedure within the waste management plan (WMP) to classify bio-solids waste, its handling (which will need to consider management through the wet season when drying will be limited), and safe disposal/use.	Before start of Operations	Incorporation of bio-solids in the WMP or appropriate procedure			<p>An assessment of the WWTP at Tinguilinta has been prepared and immediate actions, and the remedial plan has been provided to GAC. The WWTP can be remediated and the process made efficient.</p> <p>GAC now needs to schedule the remedial actions and repair/rehabilitate the WWTP, and improve its efficiency, and enable bio-</p>

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			<p>should be disposed in a beneficial manner.</p> <p>The project, and potentially the incinerator, will generate hazardous wastes and a disposal route will need to be established once a suitable volume has been generated to justify its transfer to a suitable disposal site.</p>						<p>solids to be removed from the system.</p> <p>Management of bio-solids has been incorporated into the WMP v02, and GAC intends for bio-sludge to be solar-dried on flat banded/bioremediation pad, and then added to composting material. IESC will review progress and GAC's proposed strategy on the next monitoring visit in October 2019.</p>
R0014/17	26	D6.2.3	<p><i>With specific reference to the Mine area and according to the SEIA Addendum, once a pit becomes disused, the mining plateaus will be progressively rehabilitated with natural vegetation following the principles of the Mine Closure and Rehabilitation Plan that will be developed and periodically updated, in consultation with local communities and authorities. In addition, there are opportunities across the mining concession site to restore adjacent degraded habitats to the benefit of the local biodiversity.</i></p>	GAC to develop the Mine Closure and Rehabilitation Plan in order to address mining areas restoration activities and include funding mechanism.	Before start of Operations	Mine Closure and Rehabilitation Plan	20180207 V40 Mine Closure Rehab Plan MGN Clean 13 Feb 2018.docx (DRAFT)		<p><b>CLOSED</b></p> <p>IESC reviewed the updated Mine Rehabilitation and Closure Plan and provided comments to the Lenders.</p> <p>GAC has accepted the proposed amendments and this ESAP item is now considered closed</p>
<b>PS4 Community Health Safety and Security</b>									
C0004/17	30	D4.2.1 4.2.2 4.2.3 4.2.4	<p>Guiding principles for hiring, training, equipping and monitoring security personnel for the mine and port areas and other facilities and operations, including Conakry office and transportation routes, are not defined and consolidated in a Security Management Plan.</p>	GAC will develop a Security Management Plan for the concession, port, and other GAC facilities aligned with IFC PS4 and the VPSHR and based on a security risk assessment. The plan should include Guiding Principles, Code of Conduct security personnel, rules of engagement, vetting process for security	Before Financial Close	Security Management Plan	GAC - Security management plan.pdf	Completed	<p><b>ADEQUATE</b></p> <p>The security management plan is completed and mostly adequate. The plan needs minor adjustments. A Memorandum of Understanding (MoU) with the Ministry of National Defence through which a military attaché was appointed to liaise with the company is in place and being implemented. In addition, GAC has recently</p>

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		4.1.1		personnel, procedure for investigation of incidents involving security personnel, and reference to the memorandum of understanding (MoU) with the GoG on the Provision of Security services					signed an additional MoU with Ministry of Mines detailing how the public security forces (CASSM) are to be engaged, as necessary. IESC to review Security Management Plan when this is updated.
<b>PS5 Land Acquisition and Involuntary Resettlement</b>									
A0001/17	31	D5.1.7	A completion audit for the previous resettlement in Kamsar (2008) was conducted (in 2014), and revealed gaps in the implementation. An action plan to implement the audit recommendations is in place but has yet to be implemented.	GAC to complete the implementation of the audit action plan, and provide evidence of completion of the 2008 RAP.	Before start of Operations	Completion audit of the action plan			<b>CLOSED</b> Based on the IESC visit in November 2019, the IESC considers the implementation of the RAP is progressing and actions being addressed. Issues identified in the monitoring visit will be assessed further on the next IESC monitoring visit in June 2019.
<b>PS6 Biodiversity Conservation and Sustainable Natural Resource Management</b>									
B0001/17	32	D6.1.1A	Biodiversity management requirements and monitoring/indicators should be fully aligned across documents to ensure consistency.	GAC to complete fine-tune alignment of all biodiversity mitigation measures, monitoring and indicators (as appropriate) in future iterations of BMEP and EcoS documents.	Before start of Operations	Updated versions to be provided as completed.			<b>CLOSED</b> Mitigation measures in the BMP and early monitoring measures within the BMEP have been prioritised by GAC to allow them to focus resources on the most pressing issues - see ESAP ID.36
B0002/17	33	D6.1.2	GAC has provided written clarification that they do not intend to develop fisheries in the reservoir, but will not prevent communities fishing as they do now.	Address inconsistency over plans to replenish the reservoir with local fishes, and if planned specify the requirement for a feasibility study by a fish/freshwater ecologist expert to ensure the natural balance in the ecosystem would not be affected, and record appropriately in the biodiversity monitoring and evaluation plan (BMEP).	Before start of Operations	Revised BMEP			<b>CLOSED</b> Any changes of approach such as decisions on the stocking of the fish in the dam, should be considered through the Management of Change procedures so that all social and biodiversity aspects, as well as safety and reputational risks, and responsibilities, are considered prior to any changes being made to ensure that all potential impacts are well assessed
			This is inconsistent with the mitigation measure of biodiversity management plan (BMP) Appendix 6, which states that GAC will 'stock the reservoir with indigenous species'	GAC to update BMEP to include appropriate management approach(s) to community fishing to avoid any over-exploitation of the fishery resources.					

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update Nov 2019
				GAC to expand BMEP freshwater fish monitoring to the reservoir (ensure ecosystem health & diversity maintained, and commercial species not introduced), and be cognisant of community health & safety at GAC infrastructure.					
B0003/17	34	D6.2.1A	<p>Significant results from reservoir chimpanzee surveys (part of Pre-Clearance Biodiversity Surveys or 'PCBS') demanded a more robust analysis of alternatives to minimize impacts, than has previous been undertaken.</p> <p>The timing of PCBS should recognise the increasing conversion of natural habitat to agricultural land being seen in the concession, so PCBSs can ensure true pre-impact detailed baseline conditions are captured.</p>	<p>GAC to embed in appropriate mine/drilling management plans the requirement to prioritise the timing of the PCBS so that these are available to inform/influence mine design, contractual and infrastructure planning options.</p> <p>GAC to use remote sensing imagery to rapidly assess and analyse current concession-wide land use/land cover, and over time be able to track change associated with land conversion from natural habitat (and PIIM).</p> <p>GAC to retain information on justifications wherever Environmental Buffer Zones are breached</p> <p>GAC to map ESMP &amp; BMP mitigation measures between GAC &amp; EPC plans, to avoid gaps.</p>	By start of Operations	<p>Revised appropriate mine/drilling management plans detailing PCBS review</p> <p>Develop a remote sensing program.</p>		<p><b>CLOSED</b> The Land Disturbance management Procedure and permitting system has been updated and now better reflects the intentions of the original Land Disturbance Process in the BMP Appendix 4. Satellite imagery has been obtained and used to develop updated EBZ/buffer zones around priority biodiversity features in the mine planning GIS system.</p>	
B0006/17	37	D6.2.4B	<p>One of the SEIA commitments not included in the BMP or mine plan is the requirement for a 500m buffer zone around the plateau periphery (as per in SEIA Vol.3 section 18.5)</p>	<p>Provide clarification in mine plan as appropriate on implementation of the 500m buffer zone required around plateau periphery (as per in SEIA Vol.3 section 18.5)</p>	Before the start of Operations	Revised Mine Plan		<p><b>CLOSED</b></p> <p>Although EBZ's were discussed during the site visit, it did not appear the 500m buffer periphery EBZ was included.</p> <p>As this was a commitment made in the approved ESIA SEMP, if GAC believe this 500m buffer is no longer necessary to mitigate impacts previously predicted, they should provide justification for this.</p>	
B0007/17	38		<p>A BMEP has been developed. This provides the framework for monitoring priority species at both the mine and port</p>	<p>Develop work plan for first year of BMEP implementation.</p>	By start of Operations	1 <sup>st</sup> year workplan Revised BMEP		<p><b>CLOSED</b></p> <p>Workplan developed. Evaluation of this workplan against Lender requirements</p>	

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update Nov 2019
			<i>site. Although comprehensive, the BMEP includes a large number of indicators for the staff resources available to gather and use the data for adaptive management.</i>	<p><i>GAC to review the BMEP suite of indicators to ensure efforts are focussed on obtaining the most relevant data across priority species/habitats.</i></p> <p><i>Commitment to initiate set-up phase of Feasibility Road-Map.</i></p> <p><i>GAC to initiate regular progress updates for Lenders/IESC (e.g. monthly) on steps towards Moyen-Bafing offset design and implementation.</i></p>		<p><i>Initial status update</i></p>			will be ongoing, however, the IESC concurs with this approach at this stage. IESC note that the 2017/18 dry season opportunity for gathering detailed baseline data on invertebrates and freshwater fish has been missed, but the Scope of Work for contracting rainy season surveying (to also include herpetology) has been awarded and surveys are due to start shortly. IESC will follow up during site visits.
B0009/17	40	D6.2.5A	GACs advisors (WCF/TBC) have recommended a permanent on-site set-aside. In addition to potentially offering refuge for chimpanzees, this will provide protection for Restricted Range species, and potentially the Temminck's Red Colobus.	<p><i>GAC to provide details of on-site set-aside once forthcoming chimpanzee surveys by EEM are completed.</i></p> <p><i>Once initial design of the long-term chimpanzee monitoring program is completed, integrate this into the Project's BMEP (in accordance with the BMP).</i></p>	Before start of Operations	Chimpanzee survey analysis and on-site set-aside delivery plan.			This remain open until an acceptable proposal on the onsite set-aside is provided to Lenders. Chimpanzee survey analysis and on-site set-aside delivery plan – the 2018 surveys and analyses are now completed, and a final report received. GAC is to inform Lenders on their future monitoring program and put forward their proposal for an onsite set-aside(s).
B0010/17	41	D6.2.6	<p>GAC is undertaking a biodiversity offset program for the purposes of achieving net gain for Critical Habitat at the port terminal site. A mangrove restoration program at two selected sites in the Taïgbé and Taïdy Islands commenced in June 2015, to compensate for the loss of mangrove habitat related to the rail/platform/jetty footprint. Mangrove restoration efforts at Taïgbé were recently lost due to storm surge</p> <p>The scope of works for the offset includes the requirement for an independent critical assessment review of the offset to assess its effectiveness.</p>	<p>GPS-SARL to provide a monitoring and evaluation plan which provides clarity on progress of the program and details indicators which GAC can use to demonstrate and measure progress towards net gain.</p> <p>Undertake the planned independent critical assessment review of the first 2 years of offset, to assess progress against objectives and requirements.</p>	By start of Operations	<p>Monitoring and Evaluation Plan</p> <p>Critical assessment review</p>	Rapport d'achèvement projet mangrove Kamsar VF.pdf		<p>This remains open until an acceptable offset program is provided to Lenders. The program needs to be designed and implemented according to good offset practice, able to be monitored/evaluated to deliver the required biodiversity gain expected from functioning mangrove habitat.</p> <p>The Mangrove Rehabilitation Project was not as successful as anticipated, GAC has completed their internal review and should seek external specialist technical guidance. An external review of the program was originally proposed but did not occur. A monitoring and</p>

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				Following construction, GAC to provide an updated assessment of loss (mangrove footprint) for offset purposes		Updated Conservation Loss Footprint			evaluation plan was not developed. The mangrove offset program will continue to be reviewed during future monitoring visits.
B0012/17	43	D6.3.1	<i>The latest BMP v4 App.6 refers to and builds on TBC's Critical Assessment Review of GAC's EcoS approach, outputs, and contains further necessary mitigation measures. This appendix relates each measure to various management plans where measures should be incorporated e.g. RAP, LRP, CIS, PIIM, but does not complete the mapping sufficiently to be able to adequately track implementation and monitoring.</i>	<i>GAC to map the EcoS mitigation measures between those in the EcoSA, and BMP, and mapping these to the LRP, CIS, PIIM, etc.</i>	<i>By start of Operations</i>	<i>EcoS gap analysis mitigation measures report.</i>			<b>CLOSED</b> – superseded by efforts on the Community Based Natural Resource Management Program, which once fully developed, should tie back to individual mitigation measure commitments.
B0013/17	44	D6.3.1	It is noted that almost all EcoS residual impacts are deemed to be of minor significance following implementation of ESIA and additional mitigation measures. This is considered over-optimistic, especially considering the extent of PIIM anticipated, and significantly escalating land conversion already observed.	GAC to review the level of residual significance allocated to assessed priority EcoS impacts	By start of Operations	Revised EcoS Assessment			GAC considered that the residual impacts on ecosystem services are being mitigated through the project with SYDEV. Specific actions in SYDEV reports have not yet been tied back to specific mitigation measures, to determine completeness or that residual impact significance levels are correct.
B0014/17	45	D6.3.1	It is unclear how priority EcoS issues are being managed overall, and who holds responsibility for ensuring that various individual measures to address EcoS impacts, when combined, are sufficient.	GAC to include EcoS as an issue requiring multi-function oversight within the new Integrated Business Planning (IBP) team.  This will include ensuring organisational role linkages between Biodiversity team and Communities team, and that teams discuss priority EcoS management/monitoring regularly.	By start of Operations	IBP EcoS Oversight Plan			Remains open until development of GAC's CBNRM program.  The SYDEV program looks good and appears to be making progress in the right direction in the small number of locations it is being implemented. However, internally that the community-based natural resource management program and alignment between the Environment/Biodiversity and Community teams does not yet feel settled within GAC. Successful implementation of mitigation measures to address impacts on priority EcoS will need ongoing collaboration. The IESC will follow-up on this during future monitoring visits.

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<b>PS8 Cultural Heritage</b>									
H0001/17	47	D8.1.1	<p>GAC has identified and classified cultural heritage sites that may be impacted by the project in consultation with local authorities, traditional leadership and community members.</p> <p>The SEMP indicates that a Cultural Heritage Management Plan will be developed in compliance with IFC, AfDB and Guinean legislation requirements. However, a Cultural Heritage Management Plan has not been developed. Only a chance finds procedure has been issued.</p>	GAC to develop the Cultural Heritage Management Plan to ensure that mine plans and other activities fully take account of the known cultural heritage, and incorporate appropriate buffers and protection measures.	Before the start of Operations	Cultural Heritage Management Plan			<p><b>CLOSED</b></p> <p>Discussion during the November Monitoring Visit indicated acceptable progress, and this is considered closed, but will continue to be monitored.</p>