



Plateau 20 Rehabilitation Area Nov 2022

Guinea Alumina Corporation Conakry, Republic of Guinea

GAC PROJECT

IESC Monitoring Report: Nineth Monitoring – Site Visit November 2022

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ABBREVIATIONS AND ACRONYMS

AfDB	African Development Bank
ANAFIC	National Agency for Financing of Local Communities (Agence Nationale de Fiancement des Collectivités)
ARRC	Avoid-Reduce-Restore-Conservation Task Force (IUCN)
ASI	Aluminium Stewardship Initiative
BAP	Biodiversity Action Plan
BEN	Bauxite Environmental Network
BMEP	Biodiversity Monitoring and Evaluation Plan
BMP	Biodiversity Management Plan
CAGF	FODEL Management Support Committee (Comité d'Appui à la Gestion de FODEL)
CBG	Compagnie des Bauxites de Guinée,
CBNRM	Community-Based Natural Resources Management
CE	Critically Endangered (on IUCN Red List)
CEO	Chief Executive Officer
CERE	Centre for Environmental Studies and Research (Centre d'étude et de recherche en environnement)
CFB	Chemin de Fer de Boké
CHA	Critical Habitat Assessment
CIS	Community Investment Strategy
CLO	Community Liaison Officer
COVID-19	Coronavirus Disease 2019
E&C	Environment & Community
EBZ	Environmental Buffer Zone
EcoS	Ecosystem Services
EGA	Emirates Global Aluminium PJSC
EHS	Environmental, Health and Safety
EHSMS	Environment, Health and Safety Management System
EIG	Economic Interest Group
EMP	Environmental Management Plans
EMS	Environmental Management System
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESMP	Environmental and Social Management Plans
ESHS	Environmental, Social, Health & Safety
FODEL	Local Economic Development Fund (Fonds de Développement Economique Local)
FOOS	First Ore On Ship
GAC	Guinea Alumina Corporation SA
GCM	General Control Measures (in BMP)
GIIP	Good International Industry Practice
GIS	Geographic Information System
GBV	Gender Based Violence
HC	Human Capital
HR	Human Resources
H&S	Health & Safety

HSE	Health, Safety and Environment
IBGRN	Grassroots Initiative for Natural Resource Management (Initiative de Base pour la Gestion des Ressources Naturelles)
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IUCN	International Union for Conservation of Nature
IUCN/SSC PSG SGA SSA ARRC	IUCN Species Survival Commission, Primate Specialist Group, Sections on Great Apes and Small Apes, Avoid-Reduce-Restore-Conservation Task Force
KBA	Key Biodiversity Area
KPI	Key Performance Indicators
LACRF	Land Acquisition, Compensation and Resettlement Framework
LTI	Lost Time Injuries
LTIFR	Lost Time Incident Frequency Rate
LRP	Livelihood Restoration Plan
MBNP	Moyen Bafing National Park
MBZ	Mohamed bin Zayed (Species Conservation Fund)
MBOP	Moyen Bafing Offset Program
MIGA	Multilateral Investment Guarantee Agency
MoU	Memorandum of understanding
NGO	Non-Governmental Organisation
NG	Net Gain
NNL	No Net Loss
OESMS	Operational Environmental and Social Management System
OHS	Occupational health and Safety
OS	Operational Safeguard
PAP	Project Affected People
PDS	Pre-Disturbance Surveys
PFS	Pre-Feasibility Study
PIIM	Project Induced In-Migration
PS	Performance Standard
RAP	Resettlement Action Plan
SCM	Species-specific Control Measures (in BMP)
SEIA	Social and Environmental Impact Assessment
SEP	Stakeholder Engagement Plan
SHE	Safety, Health, Environment
SHEC	Safety, Health, Environment, and Community
SMP	Security Management Plan
SMS	Social Management System
SNAPE	National Water Service (Service National des Points d'Eau de Guinée)
SOP	Standard Operating Procedures
SPV	Special purpose vehicle
SRA	Security Risk assessment
SSC	Species Survival Commission
STP	Sewage Treatment Plant
SYDEV	Synergies and Development (an NGO)
TBC	The Biodiversity Consultancy
ToR	Terms of Reference

TPI	Technology Partners International
UCOMB	Unité de Coopération pour l'Offset Moyen Bafing
USC	University of the Sunshine Coast, Australia (mangrove restoration review)
USTG	Union of Workers of Guinea ' <i>Union Syndicale des Travailleurs de Guinée</i> '
WCF	Wild Chimpanzee Foundation
WHO	World Health Organization

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's 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'. Specifically, the IESC is tasked with undertaking Environmental, Social, Health & Safety (ESHS) monitoring throughout the construction and operation phases of the Project, to verify whether Project plans and procedures and Lenders' environmental and social requirements (including International Finance Corporation (IFC)) Performance Standards; applicable IFC Environmental, Health and Safety (EHS) Guidelines, African Development Bank (AfDB) safeguards policy), are properly implemented at field level during the ongoing activities

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 30th July 2019, and is now fully operational with a focus on improving efficiencies and progressively increasing the annual throughput increasing exports from 11.5 Mt in 2021 to over 13.2 Mt in 2022.

This report presents the IESC's findings of the Project status at the time of review of the ninth monitoring event post financial close. This was the second in person visit since these restarted in 2022 after a Covid-19 required virtual audits. This audit followed the same format as the last, being conducted through a series of in person interviews (with some GAC team and lenders joining selected meeting using Microsoft Teams), combined with a series of discipline specific field visits. The site visit was undertaken between the 14th and 18th November 2022, with a wrap-up session on Saturday 19th November 2022, before the lenders and IESC departed for Conakry. Limited data was provided in advance of the site visit, with additional information requested after the site visit, with the documentation cut-off date the 15th December 2022, to provide the IESC more clarity or verify several discussion items.

This site visit enabled the IESC to continue detailed discussions of GAC's management team, management systems and operations, along with collaborative discussions of current issues and challenges as well as future ESHS plans. As with previous audits GAC's team were open and supportive of the audit and its outcomes, with the site walkovers allowing much more detailed review of local area compliance, and where relevant more nuanced recommendations, compared to the remote audits.

The 2017 Due Diligence (DD) process noted 48 non-compliances as ESAP items that were to be addressed shortly after Financial Close, before operations started. Following this 9th IESC review five years later, there are still three DD-phase non-compliances 'open' where the IESC has significant concerns about delays in issue resolution. These relate to establishing an ecologically appropriate onsite set-aside including chimpanzee surveys & analyses, an appropriate mangrove restoration offset, and enhanced management of impacts on ecosystem services across the concession. These are summarised in Section 2.1 and tabulated in Annex A.

SHEC¹ Management

The management structure for of the Safety, Health, Environmental, and Community Relations (SHEC) teams which was in the process of being refined at the time of the last audit, requires final internal agreement, but job descriptions are complete. At the upper level there are separate reports for Health, and Environment and Communities (E&C) to the CEO, H&S and Security report to the COO along with the directors for the mine and the port operations. Both the CEO and COO have a long history with the project and have specific SHEC responsibilities.

Within the environment team the new structure addresses previous discrepancies in the hierarchy of the team and the reports to the manager. This should improve the management of environment, with the number of reports to the manager being reduced. With core teams being Environmental Monitoring & Compliance, Land Use Management & Rehabilitation, and Biodiversity (also linking to Moyen Bafing team). However, at the monitoring review it was announced that the E&C Director had resigned, and a new Environment Manager position has been advertised for, this would likely mean that there is not a common manager for E&C; and there will also unlikely be an overlap (and therefore detailed handover) between the outgoing E&C Director and incoming Environment Manager (if that position is confirmed). This presents a risk to GAC in a lack of continuity in the team, and the IESC recommends that the new Environment Manager does not undertake a further review of team structure etc. until they had been in position for at least six months. While the E&C Director is leaving, on the positive side, during this audit, it was

¹ 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).

noted that the team reporting to the E&C Director remains unchanged and has better clarity on their roles and took ownership of environment, and therefore it is hoped that a change in manager will not impact the effectiveness, and competence which has built up in the team.

Safety continues to be run by the HSE Manager who reports to the COO. The position of Chief Medical Officer (who reports to the CEO as is required by EGA) oversees medical staff and offices (including ambulances) at the Mine and the Platform/Port was vacant at the time of the monitoring visit. The Environmental and Community Manger currently reports to the CEO.

The Communities team has been under the E&C Director who covers both areas, which the IESC saw as positive; however, it is now understood that the replacement manager (expected in Q1/2 2023) will just be covering Environment. This is considered by the IESC to be a retrograde change with the potential to reduce the interfaces and cooperation between the Environment and Communities teams, although the Communities team is being strengthen and the detailed structure is still evolving to better address community relations and social risks. Under the current structure, which was modified over the last six months, community relations are led by the Community Relations Manager who is supported by five superintendents in charge of (i) Land Acquisition and Compensation, (ii) Resettlement, (iii) Grievance Management, (iv) Livelihood, Migration Influx and Compliance, and (v) Stakeholder Engagement. The Project Control Manager oversees social investment and reports to the Communication and Corporate Social Responsibility Director, and the Human Capital Senior Manager and the Government Relations Manager report to the COO.

As highlighted in the last audit, while the Environmental Management System (EMS) and SMS procedures were completed and uploaded/integrated to EGA's SharePoint DMS, GAC needed to have these document locally under their control. This process of moving the Operational Environmental and Social Management System (OESMS), on to a local GAC server was still ongoing at the time of the audit (the previous action M8.1 remains open). This is using SharePoint to manage the documents, while this process appears to be taking time, a deeper dive during the visit to the way GAC managed its documents and data, demonstrated that while it was all present, it needed better organisation. Part of the issue is that the environment team has moved away from platforms like Borealis for data management (following the loss of a super user in the team and licence issues) and is considering moving off SAP for incident tracking. The IESC recommends that the Environment team follow the H&S team with adopting VelocityEHS as a platform given that there are super users being developed and it has internal IT support and does not have the licencing issues associated with Borealis (it is noted that Borealis is still used effectively by Communities). Due to this ongoing issue the IESC has raised a new action (M9.1) to highlight the need for GAC to invest in management support to finalise the OESMS and demonstrate compliance with Lender requirements.

The IESC recommend GAC provide clarification whether they anticipate that further ESIA Addendum/Addenda are necessary so as to comply with Guinea's ESIA regulations relating to any activities currently being undertaken or planned in the north of the concession (including opening access roads etc.) – the 2015 ESIA Addendum related only to activities in the southern concession, and the original 2008 ESIA for the north will be out of date.

Environment

As discussed in the last monitoring visit, the environment team structure has been refined and formally is separated in the core disciplines of environmental monitoring and compliance (incorporating, waste and resource management), biodiversity, and rehabilitation (including erosion control). Environmental audits and inspections have continued on a regular basis and the number of environmental incidents report averaged about two per month. These are typically minor oil spillages with the contaminated soils recovered and sent to the waste management area for biodegradation treatment. GAC report no environmental regulatory violations or major releases to the environment for the year up to November 2022.

GAC continue to track its resource efficiency, tracking its energy intensity, GHG intensity, water intensity, and land use intensity, against either Bauxite Industry Benchmarks or the previous years' performance. While the data indicates that generally the operations are meeting these targets there are some areas above the target (e.g., GHG intensity), however, theses have improved compared to 2021's performance. The continual drive to optimise the operations will be expected to further improve efficiency as well the striving for ASI certification. The KPI sheet also tracks land management (permits, land cleared etc.) and biodiversity and restoration, as well as training and awareness.

As would be expected with production increasing, the monthly Scope 1 GHG emissions January to November 2022 have been increasing and were over 6,834 t CO_{2eq} November, with the total Scope 1 emissions for 2022 predicted to exceed 70,000 t CO_{2eq} (the total in 2021 was 64,710 t CO_{2eq}). While absolute values are increasing, the energy intensity is decreasing indicating a more efficient operation.

The period since the eighth IESC monitoring visit, has been largely covered by the wet season and water use has averaged at 15,386 m³/month for the July to November 2022 (compared to the equivalent period in 2021 which averaged at 12,201 m³/month). This equates to an average water intensity over these months of 0.01-0.02 m³/t of ore exported which is lower than the equivalent months in 2021, and significantly lower than the industry average referenced by GAC of 0.404 m³/Mt.

The IESC reiterates its observation that now GAC have water metering data from the desalination plant, as highlighted in previous Monitoring reports GAC should move to track water use around the Kamsar platform as this is derived through the relatively energy intensive reverse osmosis system (RO) desalination plant. The KPIs for this water use should include the cost / energy consumption (or GHG emissions) per litre of water.

The waste management area on the Kamsar Platform was observed to be operating well and no issues were identified. At the Tinguilinta waste management area, a significant improvement was noted. GAC have repaired the incinerator and it was operating, and GAC were also burning paper and cardboard in barrel burners. Following the decision not to install a landfill on the site, GAC have identified a waste contractor (CEGEDI) to remove the stockpiled waste (circa 3,000 m³). CEGEDI will sort the waste to recover recyclable wastes and store the remainder until their private landfill is constructed. This company is based in Conakry and GAC report that they had undertaken an audit of the facilities. These audits identified a number of improvements required including a concrete pad and groundwater monitoring wells, which it is reported that CEGEDI is addressing.

GAC have continued the monthly air monitoring of particulate matter (PM^{2.5} and PM¹⁰); no issues were reported regarding compliance with the 24-hour limit. During the monitoring visit the use of dust suppression by water around the mine roads was noted and dust was not considered to be an issue. GAC have also moved to fixed continuous monitoring at the mine train loading, Béli Kindi (looked after by a member of the community), and main camp. This data is managed through the Dust-a-side website which sends alerts to phone and emails when there is an exceedance. GAC have purchased an automatic SO₂, NO_x monitoring system with GSM connections, and will test this before deciding on purchasing more.

An overarching issue for the environment team delivering their programmes and enabling proactive and reactive management of environmental issues at the Project has been the lack of vehicles. GAC reported that three vehicles had now been approved but had not yet arrived on site and therefore the IESC previous action on this (M8.2) remains open.

Health and Safety

GAC commissioned a third-party audit of its OHS systems in October 2022, the outcomes of which will be recommendations for improvements, with the aim of being ISO45001 compliant by the end of 2022, and GAC then will target certification in 2023 (which is budget approved). There continues to be a plan to have safety leaders attain NEBOSH certification, in August 2022 all leaders undertook ICAM (Incident Cause Assessment Method) training, and all supervisors completed 5-Whys (root cause) training. This means GAC now has trained incident investigators. GAC consider that this has resulted in a measurable improvement in H&S performance.

In January 2023, GAC will move from SAP to VelocityEHS to manage its H&S system. VelocityEHS is aligned with GAC requirements and does not have licencing restrictions. It will enable the allocation of individual KPIs and inspection requirements etc., and better tracking of actions and issues. The move from SAP will include the transfer over of all the 2022 data and actions into VelocityEHS. DTP and GPC will also start running a simplified version of VelocityEHS. The full training programme for this will be rolled out in March 2023. It also has modules for occupational hygiene, and incident/audit inspection (and there are modules available for environment). It is editable and available in English and French.

The visits to the medical facilities at Kamsar and Tinguilinta site found them to continue to be professionally managed and staffed, although the Chief Medical Officer has left and will require replacing.

During the previous monitoring visit the IESC raised a concern regarding the apparent move away from the original policy of not driving at night to a position of condoning this practise, resulting in journeys being undertaken well before dawn and after dusk. The IESC considered this to present a significant risk to both employees in the vehicles and other road users including pedestrians on the poorly paved unlit roads. It was recommended that GAC develops a journey management risk assessment which aims to minimise the risks of driving in the dark (accidents and from driver fatigue), such that, unless risks can be demonstrated to be negligible, night driving is an exception which requires senior management approval. To address this concern GAC informed the IESC during the 9th monitoring visit that a consultant had been appointed to review journey management risks and that this aspect of risks in the

communities along the route would be covered by the assessment. This action (M8.7) remains open until this assessment is completed.

In addition, GAC are focusing on driver skills and has selected 12 drivers across the business (port, those driving on public highways, and emergency services and others) to attend advance driving training and become internal trainers so that GAC are not reliant on external support/training in this area. DTP is also focused on this area with a specific permit to drive scheme in the pits.

During the monitoring visit no significant H&S issues were identified although there were a number of observations and recommendations arising from the audit. These included recommending that GAC review the practice of requiring workers to clean their PPE as this oil laden PPE may put at risk family members to chemical exposure and be causing contamination of the home environment. Also the IESC observed a number of instances where the use of small car jack in preference to the supplied equipment larger robust jack, presented a significant risk of crushing or fatalities to anyone working by or under the vehicles, and an action raised on this issues (M9.2). However, overall H&S appeared well managed at the site.

The IESC revisited the explosives storage area operated by Auxin who took over as the contractor in April 2022. The explosives store is owned by DTP but controlled and managed by Auxin. Auxin also provide their services to GPC for the blasts on in the areas mined by them. Auxin management explained the explosives for GPC are delivered by road from Boké, which is approximately 36 km away, and that this was required due to traceability and contracting issues. Auxin explained that this material was not transported mixed (i.e., as an 'explosive') as this mixing was only done at the blast hole. Furthermore, Auxin also undertaken public information campaigns in the villages along the route to explain the risks associated with any road traffic accident. As a consequence of this improved understanding the IESC consider that the previously perceived high project risk associated with this transport is managed and acceptable and the action raised (M8.5) closed.

Biodiversity

Following this monitoring review the status of GAC's compliance with Lender requirements for biodiversity is as follows:

- There are three new areas of non-compliance: ecosystem services impact mitigation, non-adherence to the chimpanzee monitoring components of the Biodiversity Monitoring Procedure, and non-adherence to the Pre-Disturbance Procedure when undertaking activities at Plateaus 7 and 15.
- Two non-compliances have been closed: erosion control to protect mangroves at Kamsar, and fulfilling the immediate requirement to increase Biodiversity Team resources and capability.
- In total, there are now ten areas of non-compliance related to biodiversity and natural resource issues.
- Four of these ten non-compliances relate to ESAP items still open from the 2017 Due Diligence phase (see Appendix A): two related to ecosystem services and natural resource management, establishing an appropriate mangrove offset program, and establishing an appropriate onsite set-aside to preserve priority biodiversity onsite.

The IESC cannot stress too highly the importance of closing non-compliances, especially those that remain open after 5 years. The non-compliances are summarised in Section 3, and a number of recommendations are listed in Section 7.4, based either on international good practice or to avoid future non-compliances.

For the site visit undertaken in November 2022, the slightly longer duration enabled the IESC and IFC Biodiversity Specialists to maximise the time spent in the field, allowing more sites to be visited and observations made.

Biodiversity Team staffing, resources and resilience:

Following the departure of the Biodiversity Specialist earlier in 2022, and the number of unresolved compliance gaps, GAC have now engaged Okapi consultants for 12 months to support the work of the Biodiversity Team. Their focus areas for priority attention include developing a Biodiversity Action Plan (BAP), developing an appropriate suite of NNL/NG metrics, the mangrove offset, developing an appropriate onsite set-aside (which should include an ecological justification and management plan), adaptive management and the community based natural resources management (CBNRM) program. Cross-cutting themes related to ecosystem services and cumulative impacts will need to tie in.

The IESC/Lenders discussed aspects of GAC's work program at length with Okapi and the Biodiversity Team, and emphasised the importance of development of the BAP, in conjunction with reviewing/updating the Biodiversity

Management Plan (BMP) and ensuring full implementation of the Biodiversity Monitoring and Evaluation Plan (BMEP). Development and/or full implementation of these three key documents require priority attention for the company to reach compliance with Lender standards, and from which all other priorities will be captured.

Okapi's brief also includes mentoring the existing Biodiversity Team. The Team have again requested training in GIS, data analysis/interpretation and staff management. Ongoing training and skills development are critical for staff development and to address team motivation, especially during times of repeated senior management change, team structure upheaval and team personnel disruption.

The IESC encourage GAC to fully utilise the technical and additional resource opportunities that Okapi consultants will bring and strongly recommends that Okapi's work dovetails seamlessly with any updated biodiversity work plans, so that their short 12-month contribution can be maximised for long-term program implementation.

Biodiversity Management Program:

With the team resource issues experience through 2022, this has continued to expose that mitigation measure effectiveness is not tracked, progress not reported, and adaptive management not occurring. The IESC were told previously that the BMP's General and Species-specific Control Measure (GCM & SCM) indicators were to be reviewed once the Quality Hectare (QH) Methodology had been completed and applied, and that a revised BMP would then be drafted. An update on systematic implementation of all GCM and SCM mitigation measures was not made available for this review, nor information on how they might be revised. For Okapi's forthcoming review, the IESC stress the importance of GAC's biodiversity impact mitigation measures being fit-for-purpose, that they are integral to an annual, resource-capable work-plan, that their implementation is demonstrable, and their performance tracked to understand the need for adaptive management. These are essentials in any management system.

The land disturbance process associated with mining new pit areas is generally working well, although GAC's Procedure does not seem to have been followed *prior* to the bauxite grade drilling activities at Plateau 7 and 15 in the northern part of the concession. The IESC flag that activities should be halted until surveys are complete and appropriate mitigation measures developed – a new non-compliance is listed in the Issues Table (M9.5). GAC advise there have been no incidents where Environmental Buffer Zones (EBZs), Critical Habitat or priority species were directly affected since our last review.

At the Kamsar platform, the soil erosion issues observed at in the vicinity of Bridge 5 have been corrected with new road-edge berms/storm-water direction areas re-constructed; the non-compliance M8.10 opened in May 2022 is therefore closed. The re-construction of culverts at Bridge 5 is due to be completed in the next few months and will enable the reinstatement of a full tidal cycle flow of seawater up to mangroves in the Dougoufissa Creek. A temporary seawater diversion is currently in place, although footprint into additional mangrove area was observed. The non-compliance item NC-M2.5 remains in place until seawater can flow freely through the creek and activities to ensure fully functioning mangrove habitat restoration are underway.

Rehabilitation and revegetation of five pits has progressed during the 2022 rainy season. The topsoil retained by GAC during mining operations appears to have retained sufficient seed stock for initial regeneration, aided by grass seed application. In addition, 115 ha have been replanted with tree and shrub species grown in GAC's pilot nursery and the community nursery at Belikindy. Initial observations are that GAC have made good progress regenerating pit areas on their first two plateaus (20 and 26). The IESC recommend GAC consider and identify how they will measure regeneration and restoration success.

Again, no updates were available on the identification of wildlife corridors across the concession, any analyses on priority species distribution or how they will inform infrastructure or road planning to minimise habitat fragmentation across the concession. As activities increase in the northern sector, identifying and retaining key wildlife corridors will become critical for GAC to be able to adhere to the mitigation hierarchy.

Weed management campaigns continue once a year at Kamsar, and GAC reports that 92,000 individual weeds have been removed during 2022. Weed species *Chromolaena odorata* has become an increasingly problematic issue at Kamsar and is being actively targeted by digging up individual root systems prior to seeding and burning on site. For species where foliar herbicide might be used (for example Glyphosate), extreme caution should be used anywhere near the perimeter fence at Kamsar platform or in any circumstances where it could adversely affect aquatic habitats. GAC should ensure that any use of Glyphosate is kept a minimum of 100m from waterbodies, as per their Procedures. *Chromolaena odorata* is now also a significant issue at the mine site, with outbreaks in the Thiouladjwol valley being particularly problematic – GAC report that over 95,000 individual plants have been

removed just in the area around the dam. GAC's Para-Technician/ ecologists based at the mine-site undertake biomonitoring and weed removal. Data was not made available related to hectares of weed management effort, or hectares of the concession experiencing active weed monitoring.

GAC continues to participate in the Bauxite Environmental Network (BEN) to work on issues of joint concern and in theory to manage cumulative impacts. Little new information was provided during this site visit. The IESC again recommend GAC identify the specific cumulative impacts they are seeking to manage through the BEN, and determine how effectively their mitigation is being monitored. Where there are cumulative impacts that BEN will not help GAC resolve within 3 years, GAC should propose to Lenders how these gaps will be filled within that timeframe.

The IESC again requested the latest version of all OESMS biodiversity management plans and procedures updated during the 2020/21 review, but these were not available at the time of writing.

Biodiversity monitoring and evaluation program (BMEP):

Implementation of field monitoring has typically been under the responsibilities of the Biodiversity Superintendent, Biodiversity Supervisor and their field team. The Biodiversity Team continues to collate all monitoring results in their bespoke biodiversity database (aka the Environmental Console) developed internally, including camera trap observations. There was no update on the forthcoming monitoring program/schedule or threshold levels to trigger intervention and adaptive management during this review (both were the responsibility of the previous Biodiversity Specialist).

GAC advised that their two Kamsar-based Para-Technician ecologists continue to monitor seafood landings at the local fish market, capturing records on data collection sheets and conversing with fishers and market holders on fisheries sustainability. Benthic monitoring is required annually, but there was no confirmation that a contract to undertake the work has yet been awarded.

Dry season freshwater ecology sampling was undertaken in May 2022 by SAMEC, and eDNA specialist consultants Nature Metrics processed the samples. An extract of the eDNA results table listing freshwater species identified (primarily to genus level) was presented by GAC. It is good that the Biodiversity Team have been progressing with twice yearly sampling, however, there was no analysis or interpretation provided. The existing non-compliance M8-9 is retained.

Camera traps continue to be deployed across the north and south of the mine concession, serviced by the 17 Para-Technician ecologists. The traps are deployed for 50 days in the wet season, and 50 days in the dry season. The Biodiversity Supervisor and two Technician ecologists catalogue all the captured sightings. A bar chart of 2022 wet season results presented indicates chimpanzee, bushpig and bushbuck are the most frequently encountered species; there has not yet been any temporal or spatial analysis of camera trap results.

No update was provided on chimpanzee faecal sampling or results. GAC are not in compliance with the requirements of the Chimpanzee Data Collection Methods within the Biodiversity Monitoring Procedure – a new non-compliance is listed in the Issues Table (M9.4). As noted above, any spatial planning relating to GAC's road network routing and the retention of important wildlife corridors onsite should be informed by up-to-date, scientifically robust data including Chimpanzee monitoring and analysis.

It is encouraging that parts of the biodiversity monitoring program are now being progressed. However, the IESC consider that gaps in BMEP implementation and evaluation, and the consequences from this, should be fully understood and acknowledged by GAC. As noted previously, by not interpreting and analysing monitoring results, there is significant risk that GAC does not fully understand how well direct and indirect mining impacts are being managed and the pressures on priority species. Gathering data is vital, but then needs interpretation and evaluation to enable a client to meet PS6 Para 17. A Lender funded project operating in Critical/Natural Habitat cannot assume that measurable adverse impacts are being avoided; this needs to be demonstrated. Therefore, non-compliance item M-3.8 is retained (originally raised in 2019).

Residual impacts, metrics, offsets, and onsite set-asides:

Regarding GAC's Quality Habitat Hectare Methodology developed during 2021, there was again no update on its finalisation or use. Establishing a baseline for habitat condition using this methodology will allow GAC to understand and track losses and gains in habitat quality over time (whether direct or indirect) and should inform overall loss/gain calculations. The baseline QH assessment would also enable GAC to set targets for>NNL/NG and demonstrate progress towards these targets.

Responsibilities that previously fell within the Biodiversity Specialist's remit included stewarding the methodology for calculating habitat condition ('Quality Hectares', or QH), the development and use of No Net Loss/Net Gain (NNL/NG) metrics for priority species and habitats, the development of NNL/NG targets (and interim targets), and development of the Biodiversity Action Plan. Therefore, these parts the program have stalled and will need to be a key focus area for Okapi consultants. Lenders consider development of an appropriate BAP as very high priority, as this should provide detail on how GAC intends to achieve and demonstrate NNL and NG across all required priority species and habitats. Once again, the IESC flags with priority to Lenders the lack of urgency applied to demonstrating NNL/NG as per Lender requirements – non-compliance item M4.5 is retained.

The scope of the 2017 Pre-Feasibility Study required for GAC's chimpanzee biodiversity offset accounted for impacts on chimpanzees only to the south of the railway line running roughly E-W across the concession (plus the reservoir). With activities in the northern part of the concession ramping up (bauxite grade drilling and potential refinery planning), and the need to compensate for associated impacts to priority species/habitats including chimpanzee populations, GAC will need to refresh their Residual Impact Assessment and No Net Loss and Net Gain assessments and offset calculations (related to non-compliance M4.5).

Although previously unclear whether a land use/ land cover change assessment report had been developed and/or delivered by Biotope (as per their workscope), it now appears that this report had been completed (as Okapi has a copy). The IESC requested a copy, but this was not available at the time of writing. The outcomes from the land use change assessment, the QH condition assessment, the development of appropriate metrics and reassessment of residual impacts, all need to be detailed within the BAP, and hence all contribute towards non-compliance item M7.1, which is retained.

GAC have now recruited a replacement Moyen Bafing Offset Program (MBOP) Director who took up the position in September 2022. During the site visit, the MBOP Director presented part of their presentation to IESC/Lenders, but there was insufficient time to view all slides and discuss further. A summary of current and mid-term timeline activities was presented. A workplan has been established for 2023, and an outlook for 2025 finalised. A Transition Plan, to enable the MBOP to transition from the setup phase into an operational phase is now complete – this was not available at the time of writing. The ESIA, to be developed to understanding the impacts related to a park being established and operated, is due to be underway by mid-2023, so that it can inform the proposals expected from potential Park Operators. Amongst other priorities, the new MBOP Director has recently been assessing opportunities for leveraging additional financial resources to support the MBNP development. A Public-Private Partnership (PPP) will be the model for park management, and a Panel is to be established to include representatives of key parties. Another focus area for the Director has been/will continue to be budgetary cost overruns and improving delivery of MBOP outcomes in a financially efficient manner. Lenders will now be in receipt of RINA's second report reviewing the MBOP (dated August 2022), and aware of its recommendations.

GAC's attempts to restore mangrove intended to offset for the impacts on mangrove Critical Habitat impacted by construction of the Kamsar platform and quay has been catalogued in previous IESC reports. GAC have now identified three proposed pilot sites nearby the Kamsar platform for mangrove restoration, where rice paddies have been abandoned due to excessive seawater inundation. Observations from the November site visit indicate the area is already under intense land use pressure, and paddies considered abandoned are still in active use. If the areas are still viable for rice cultivation, and local population numbers continue to increase, GAC's attempts to restore mangrove so close to Kamsar could potentially displace impacts nearby if further mangrove areas are cleared for rice cultivation to replace those in use by GAC for restoration. In addition, there are plans for a new road linking a jetty and oil tanks (yet to be built) to Kamsar town which will cross through the area GAC proposes for mangrove restoration. These are threats which raise further concerns around the likelihood of securing long-term conservation success by proposing to restore mangrove so close to Kamsar. The IESC has recommended in previous reports that GAC requires specialist mangrove and specialist technical offset assistance, to help scale up from piecemeal restoration attempts and instead develop a Lender-approved biodiversity offset program to compensate for the lost mangrove habitat. Okapi advise this is another of their key focus areas, and they have a mangrove specialist available to assist in this work. GAC advise that a Conceptual Plan for the proposed mangrove restoration has been drawn up and will be evaluated by Okapi before being submitted for the approval of Lenders. The non-compliance M3.10 (linked to the original Due Diligence ESAP item #41) is retained.

No update was available on the marine species research programs where GAC are looking to support additional conservation activities as part of their approach to NNL/NG for marine species (African Manatee, Atlantic Humpback

Dolphin and marine turtles). The IESC again recommend GAC to maintain positive negotiation momentum, resulting in scientifically robust studies and positive conservation action.

Legally protected and internationally recognised areas:

Lenders have long encouraged GAC's original suggestion to support the establishment of Boulléré (considered a Key Biodiversity Area, KBA) as a set-aside for the preservation of priority species, especially restricted range species.

The IESC again recommend specialist technical support to work alongside CBG to identify the extent to which biodiversity values might have been eroded, and the feasibility of preserving the value that does remain. Then following discussion with Lenders, a proposed conservation plan should be developed to restore Boulléré biodiversity value through forest and headwater restoration, considering the need for communities within the boundary to maintain/attain sustainable livelihoods and reliance on ecosystem services. In an attempt to preserve whatever biodiversity value remains within the Boulléré boundary, the IESC suggest that GAC attempt to avoid further degradation within the Boulléré boundary, and consider paying an immediate compensation for use of the land as a set-aside i.e., instead of compensating the landowner to use the land for mining, the compensation is instead paid to enable preservation and restoration of biodiversity (for as long as residual mining impacts persist on the concession). This is another key area in Okapi's work plan. The ongoing non-compliance item M5.5 related to the development of an onsite set-aside is retained.

Management of Ecosystem Services / Community-based Natural Resource Management (CBNRM):

Dialogue with GAC over the last few years has focussed on efforts to establish a Community Based Natural Resource Management (CBNRM) program at the mine. However, for compliance with PS6 paragraphs 24/25, it is important that GAC manage impacts on all priority ecosystem services potentially impacted across the concession and port.

In GAC's 2017 priority ecosystem service report, building on the ESIA mitigation measures, a number of residual impacts were deemed to be of 'Minor' significance. This significance rating would be dependent on identified mitigation measures being implemented effectively, with effectiveness monitored and adaptive management in place to respond to any findings of concern. GAC does not currently systematically track the implementation or success of ecosystem service mitigation measures at either the mine or port sites. Therefore, the IESC are not able to determine the extent to which impacts to ecosystem services are being managed in compliance with Lender requirements such as IFC PS6 Para 25. A new non-compliance (M9.3) is raised in the Issues Table. The IESC recommend GAC review their implementation of the original ESIA mitigation measures related to ecosystem services, plus the 2017 additional mitigation measures, to ensure that all mitigation measures are effectively avoiding or minimising impacts, and that these are monitored in a way that informs GAC's approach. It would be timely to ensure the assumptions used at the time are still appropriate, now that GAC have been operating for over five years in the area.

The IESC and Lenders have repeatedly expressed concern related to significant risks to ecological values observed across the concession, as a result of large-scale land-use change and habitat conversion to commercial crops/cashews. Without careful community engagement, natural resource management, strategic road planning and access restrictions, continued habitat conversion is highly probable – therefore, GAC's regeneration and restoration efforts will likely be compromised. Recognising the ongoing widespread land use change, GAC had previously agreed to develop a CBNRM Strategy to guide a program of natural resource management with communities on the concession. A contractor was to be retained to undertake the landscape level assessment agreed in November 2020, to help develop a program for (a) conducting a landscape assessment identifying and mapping biodiversity priority areas / objectives and community land use / livelihoods / ecosystem needs, (b) build CBNRM-related community capacity, and (c) improve effective communication with communities tying in post-mining rehabilitation/restoration of land. No update was available on contractor engagement or the landscape level assessment.

GAC had previously contracted IBGRN to undertake a pilot CBNRM program in the Thiouladjiwol Valley – note: GAC are aligning this program with a pilot set-aside program in the same area, with the aim to protect the headwater and surrounding forest. This contract of work is now complete, and a final report has been developed but was not available at the time of writing. The senior management approval of the budget (noted in the last IESC report) to implement the program further is still pending. The IESC encourage GAC to demonstrate how the pilot CBNRM program will make natural resource use more sustainable and reduce observed pressures. The IESC recommends

GAC consider how they will measure success of the program and show that negative impacts on natural resources are being avoided. This will ensure adaptations and improvements can be made where necessary, building on these pilots, as programs are rolled out in other areas across the concession.

Labour Management

In November 2022 the project had 3,269 workers including direct employees and the contractors' workforce, approximately 300 more than in May 2022, due to the expansion of the operations and reduction of Covid constraints. The number of GAC direct employees decreased by 2 from December 2021 to 432 from 434. The number of expatriates is 70, 3 less than in May, while Guinean nationals remain stable at 362 (361 in December). The total number of female direct employees was 39, 3 more than at the end of 2021, and there were 188 women working for the project through contractors, 40 more than in December 2021. Although there was an increase on the number of women in the project, the percentage of female participation remains at 9% and 6% respectively. GAC have yet to develop and implement a Gender Strategy to support female participation in the direct and contractor workforce as per action M1.18.

Since the last site visit, GAC have implemented several major initiatives to address and improve working conditions including a review of salary grades for all positions to ensure equal pay for same jobs, the development of policy against bullying, harassment and discrimination, a survey to all direct and contractor workers to identify issues related to discrimination and harassment (Libra Project), a campaign to disseminate and improve the use of the workers' grievance mechanism, a labour rights awareness campaign for direct and contractors' workers, and the restart of labour audits of its main contractors, which were suspended during Covid-19. The salary review and grade realignment resulted in an average salary increase between 5 and 25% for all positions with an average increase of 12.5% starting in September 2022.

GAC maintain constant communication and good relations with its Union, However, one of its main contractors, Laguipres is not allowing its workers assigned to GAC's operations to unionise. According to GAC, although they support freedom of association for its employees and contractors, and Guinea legislation allows for the creation of unions in any company with 20 or more employees, Laguipres decision is protected by a ruling of the Ministry of Defence that allows security companies to refuse the right of employees to form a Union. Freedom of association is a core principle of the ILO and IFC PS2. GAC need to ensure that all its contractors respect the right of workers to organize and form a union. If Laguipres or any other contractor or subcontractor do not respect the principle of freedom of association of its workers, GAC should replace them with firms that comply with all GAC's labour policies, Guinea legislation and the Lenders requirements (action M9.06).

From January to November GAC received 25 grievances through the HC mechanism from direct and contractors' workers related to inaccuracies of payment, sick leave, benefits and one grievance of harassment was registered from the Libra Project survey. At the time of the site visit, 21 had been closed and 4 were being processed. During the site visit attempts were made to contact the toll-free number. After a couple of failed attempts, the call was answered by a local grievance officer. GAC need to ensure there is always someone available to answer the phone during business hours (7:00 am to 4:00 pm), potentially by rerouting calls to one or several back-up persons when the designated person is unavailable, or that the caller is able to leave a message and is prompted to call during the hours of operation.

It has been identified (through the Libra Project survey) that there is some fear of retaliation for using the grievance mechanism and during the site visit, contractors' workers informed of potential retaliation against workers leaders for trying to form a Union. GAC do have a grievance mechanism for compliance managed by a third party to increase transparency and confidentiality and reduce the fear of retaliation. GAC informed that a new Anti-Retaliation Policy has been drafted. The policy needs to be disseminated and implemented.

Since July, GAC hold biweekly meetings with its main contractors to review and resolve potential labour issues. Although GAC provided the detailed questionnaire applied during the labour audits, a procedure and plan to regularly audit contractors' labour and working conditions is yet to be developed as per action M8.11.

There has been no progress on the development of the workers' housing strategy.

Social Management

In Q3 2022, the roles and responsibilities of the social management team, and the objectives, targets and measures to monitor and evaluate social responsibility were finalised and incorporated in the SMS. At the time of the site visit training and awareness of the SMS was well underway for the Community Relations team and was expected to be completed before the end of the calendar year.

Community Relations was restructured over the last 6 months under the E&C Director. The increase of positions in the area from 13 to 19 with the support of 13 community relays and additional temporary resources to carry out compensation functions as needs is seen as a positive step to adequately manage social aspects. With plans to refurbish the railway, one full time position within the Stakeholder Engagement team has been designated to manage stakeholder relations along the right of way. As the Environment and Community functions, are separated, GAC have encouraged to assign one person in the Community Relations team to coordinate activities with the Environment and Biodiversity teams.

GAC have a Social Risk Register through which potential risks to the project and to communities from project activities and external factors are tracked. Risks and management measures to mitigate the risks are regularly analysed and updated. Forty-nine risks are tracked ranging from political instability and extreme weather conditions to safety and security of the explosives' storage area, community compensation, demobilisation of the workforce, fraud, and damage to ecosystem services, to name a few.

Community Relations:

After a considerable reduction of interactions in the first four months of 2022 (45 interactions compared to 70 during the second half of 2021), communities visited during the previous site visit considered that they need to be engaged by GAC more often and in a more meaningful way. The community relations team committed to increase the number of engagements with each of those communities. GAC initiated a campaign to strengthen communication with the communities, increase understanding of community grievances and concerns, and sensitization on the grievance mechanism. 305 peoples (43 men, 121 women and 141 youth) from 23 communities were engaged during the campaign. The monthly average number of interactions increased to over 150 from May to November. During the review period, the leading topics addressed in community interactions was related to land access, compensation, resettlement and livelihood restoration, followed by health and safety, which was the leading issue during the previous period. Other topics of interactions were related to environment, social support and community development, local employment and influx management.

As part of the campaign and to permanently improve communication, GAC have installed bulletin boards in communities in the concession and port areas. Notices are being displayed in the bulletin boards focusing on dissemination of the grievance mechanism and job postings for local recruitment. Close to 2,000 posters displaying the toll-free number for the reception of community grievances and concerns were posted throughout communities of the area of influence. However, not all communities receive posters, and members were not fully aware of the grievance mechanism. GAC are encouraged to reinforce the campaign and ensure all communities in the area of influence understand the grievance mechanism.

Women still are underrepresented in most stakeholder engagement and consultation, and in local employment programs with approximately 93 % male participation. GAC continue to work towards gender equality in community consultation and participation, and, based on the newly approved Diversity and Inclusion Policy, is in the process of developing a Gender Strategy specifically to increase female participation in engagement and consultation activities (action M1.18). The strategy should include increasing the number of female staff in the Community Relations team which currently has only one woman in the team of 13 staff. As the community relations team is strengthened, GAC have reserved one position to be filled by a woman. GAC should consider prioritising hiring women for all new positions and for any position available through turnover in the team, including community relays.

Grievances and Conflict Management:

Between January to August 2022, GAC received 21 grievances, the lowest number of grievances received in the last six semi-annual periods. 129 grievances were registered through the stakeholder engagement campaign. Of the 148 grievances received from January to November, 139 were resolved within the 30-day target period. Grievances were related to access to land (38%), resettlement (17%), livelihood restoration (15%), and environment, local employment and subcontractor operations (9%). The analysis of the grievances has resulted in improvement on the land access procedure to ensure contractors are aware of individual property rights and the need to respect boundaries and obtain clearance from the community relations team prior to conducting any work outside of the compensated land.

Social Investment:

Through the IFCSIA and discretionary component of the CIS, during 2022, GAC supported seven projects: fish smoking, market gardening, fruit production, community nurseries, mechanical training, soap production and a sewing program. The projects benefit over 500 people (close to 80% women) in 26 communities in the concession and port areas. The vocational (mechanical) training program supported by DEG is expected to be permanent. The remaining programs are expected to be finalised in Q1 2023 as originally intended, with the exception of the fish

smoking program that has been suspended due to poor results, redirecting the assigned funding to more effective programs.

In Q3 2022, GAC conducted an internal review of the social investment projects and conducted a SWOT analysis of its social investment initiatives. Strengths identified included strong commitment to local procurement and localisation, meeting of legal and contractual obligations, and beneficial partnership with international financial institutions focused on sustainable investment, while the main weaknesses were a low degree of success on the sustainability of community economic development projects. GAC also identified the need to develop a distinct CSR strategy building a coalition with the Chamber of Mines and international financial institutions to advocate for reviewing of the FODEL legislative and regulatory framework and with the support of the IFC is working with the government to set the necessary regulation for governance, reporting and oversight of FODEL.

Based on the SWOT analysis, GAC are considering changing its approach to social investment to leverage available sources of funding such as from the Abu Abi Development Fund and other organisations and involve development experts from to develop larger and more ambitious development projects with regional impact. GAC will analyse the performance of all social investment programs implemented since 2018 and develop a new CIS. The study is expected to be finalised in Q1 2023 and the new CIS is expected to be completed to start implementation by a development NGO in Q2 2023.

Community Health and Safety:

Among the community health and safety risks GAC have identified road accidents, increased rail traffic, interaction with mine activities, emergency situations such as fires or dam failure, blasting, in-migration and communicative diseases.

GAC continue 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. During the site visit, however, it was noticed that still not all pedestrian crossings were appropriately signalled as per the community access routes strategy developed in consultation with communities. GAC should review all community routes and haul road crossings to ensure they are adequate marked, signalled and controlled to avoid incidents.

A rail safety awareness campaign was also held in September with the participation of 366 people from nine villages along the right of way. GAC together with CFB and CBG will need to closely coordinate consultation with communities along the railway to find adequate measures to reduce safety risks as the speed and frequency of the trains increase after refurbishing the railway.

To manage safety risks to community members related to blasting, letters with the blasting schedule is submitted to village authorities in advance to make security arrangements, and community relays notify community members of the place, date, time and safety buffer area limits 24 hours before each blasting event. During the site visit, community members of Kantambafenda mentioned that they are not informed prior to blasting. The community is located approximately 10 kilometres from the mining operations area, out of the blasting risk area, but community members have agricultural plots near the places where blasting takes place. GAC need to reinforce communication and provide blasting schedules to all communities whose members may be affected by blasting.

GAC continue to engage with fishers in Kamsar for sensitisation on safety risks. The port authority, supported by GAC and other mining companies operating in the Rio Nunez straight inform fisher of vessel movements. A study to assess impact to fishers and improve security is expected to be finalized in Q1 2023. Water safety awareness is also provided in communities near the dam. GAC should monitor malaria and waterborne diseases to ensure the operation of the dam is not negatively affecting community health, as per the dam environment and social management plans.

GAC have initiated the implementation of 3 projects in the Thiouladijwol valley as part of the CBNRM program (beekeeping, breeding small ruminants and use of clean stoves). Although the projects are expected to benefit community members, there is no evidence that the conservation value or the effect on protecting ecosystem services of the projects has been assessed. GAC need to develop & implement a proactive, integrated, strategic approach to CBNRM at the landscape level to ensure ecosystem services are protected.

Influx Management:

According to a survey recently conducted by GAC as part of its influx management strategy, the main reasons identified for migrating to the area are development of income-generation activities (43%), search for jobs (16%), relocation of workers (10%), development of agricultural activities (29%), and increase in government employees (2%). The first three motivations to immigrate to the area can be mostly attribute to the increase of activities of the mining industry in the area.

Ongoing influx management activities that are expected to be finalized in 2022 including (a) conducting demographic studies in 75 villages in GAC concession, workshops with prefectorial, sub-prefectoral and inter-village committees for management of migratory flows, and capacity development support for influx management in 30 villages of the concession. Activities planned for 2023 include support for zoning and village subdivisions in five villages and providing additional training for managing village territories for 30 villages in the concession.

The population in the three communities has increased from 2,737 in 2018 to 4,948 inhabitants in 2022. The population has increased 26%, 49% and 133% in Sinthourou Thiouladji, Beli Kindi and in Filima respectively. The rapid population increase in the three villages and especially in Filima has put considerable pressure on the infrastructure built by GAC as part of the resettlement process. These three villages have been prioritised for the implementation of the capacity building program for management of migratory flow.

Security:

GAC informed that the security risk continues to be rated as medium, and there has been no security incidents or significant change with regards the situation in the country or with security arrangements. After the January 2022 strike of the security contractor, Laguipres, some of the demands of the security guards were met, however the right of workers to unionise has not been granted. This is not only a non-compliance with Lenders' requirements, but also has created significant dissatisfaction among private security guards and may significantly affect the security function. GAC need to closely monitor the situation and resolve the issue as soon as possible.

Land Acquisition, Compensation and Resettlement:

The Community Relations Manager oversees aspects related to Land Acquisition and Resettlement with the support of eight staff including three superintendents: (a) Land Acquisition and Compensation, (b) Resettlement and (c) Livelihood Restoration. For 2023, GAC have added a position to support monitoring and evaluation of resettlement, and position to oversee livelihood restoration. These new positions have been approved and are expected to be filled in early Q1 2023.

GAC have updated the LACRF to include (a) assessment of land requested for mine operations to "carve out" as much as possible good quality agricultural land, (b) an updated procedure to confirm with the mine department proposed locations of replacement land to avoid the need to displace people multiple times, and (c) a new procedure to streamline land acquisition of "small extensions" for mine operations. The amendments to the LACRF are mostly complete with minor adjustments to be incorporated including defining the criteria to determine "small extensions" that can be acquired through the streamline procedure without the need to develop a full RAP. Detailed procedures to operationalise the modifications of the LACRF need to be developed and incorporated in the SMS as per action M8.12. GAC's strategy to minimise the risk of displacing people multiple times may need to be revised once the strategic CBNRM approach is completed, to ensure livelihoods of economically displaced people are fully restored while protecting ecosystem services.

As GAC rehabilitates post-mining areas, the Community Relations team has initiated the development of a procedure to reinstate rehabilitated areas to communities to support livelihood restoration. This needs to be carefully developed in coordination with the environment and mining departments, as the areas may be mined again in the future and the environmental and biodiversity teams consider that natural revegetation of these areas needs to be prioritised over community economic development interests.

Most resettlement commitments in Béli Kindi and Filima have been completed. In July, GAC initiated the repair of construction defects of the replacement housing and the water systems in both communities. At the time of the site visit both projects were near completion and expected to be finalised in December 2022. Action M4.10 related to this non-compliance will be closed once the repair of the houses has been completed and the water systems are functioning properly in both communities.

After considerable delays, with the resettlement of the displaced artisans from Dapras, the construction of the artisan centre in Filima is underway. The first phase of the centre with space for 16 artisans is expected to be finalised before the end of the year and the centre will be completed with space for all artisans in Q2 2023. Action M1.22 related to this non-compliance will be closed once the artisan centre is completed and transferred to the affected artisans. GAC are also supporting the artisans to organise and formalise an Economic Interest Group and is evaluating the donation of scrap method to support vulnerable artisans' livelihood restoration.

In Sinthourou Thiouladji the construction of the school had been completed and the multipurpose community centre is near completion. The design of the 6.5-km community access following the old access trail to Tinguilinta has been finalised and the contractor for the construction of the road has been selected. Construction of the road is expected to be finalised in June 2023 to complete all infrastructure commitments for the resettlement of the community.

GAC supported the implementation of waste management projects in both communities with the designation of a landfill area in each community and training; however, the projects are not currently operational in part because the communities are awaiting the equipment to process plastic, which is to be supplied by GAC. GAC need to provide the equipment and should consider continue supporting this project in both communities and replicating it in Sinthiourou Thiouladji.

During 2022, 434 people (50 men and 384 women) have benefited from livelihood restoration in 12 villages affected by economic displacement, and through the economic development program 154 households, including the 60 artisans from Dapras have received business training.

GAC engage external consultant to audit the implementation of the RAPs annually. In addition, an assess of all livelihood restoration programs conducted in Q3 2022 found that there are issues with the sustainability of all livelihood restoration projects. Recommendations to improve livelihood restoration programs include (a) consolidation of materials and equipment purchases to reduce costs and improve efficiency, (b) reinforce training on governance for participants of all projects, (c) use local suppliers and take advantage of local production (d) improve monitoring and assessment of productivity, (e) provide emergency support when needed, and (f) train beneficiaries to repair equipment provided. GAC need to develop an action plan to implement the recommendations of the assessment.

To support livelihood restoration and economic development of people resettled in Filima, GAC promoted the creation of a community-based company (ENIG) that provides manpower and services to GAC. There are claims in the community that although more than 20 people invested in the company, only one person controls and manages the company favouring certain groups within the community and excluding others. This issue has created significant divisions and conflict in Filima. Although GAC are not responsible for the internal functioning of ENIG, GAC should investigate allegation of misconduct and provide support for the resolution of the conflict. In addition, GAC should closely monitor and provide support to the artisans from Dapras to create and inclusive and well managed EIG to avoid potential conflicts in the future.

In addition, GAC are required to undertaking a completion audit of the RAPs once all mitigation measures have been substantially completed and displaced persons are deemed to have been provided adequate opportunity to sustainably restore their livelihoods and living conditions. GAC have engaged external consultants to undertake the completion audits of the Béli Kindy, Filima and Dam and Pipeline RAPs. The completion audits are expected to be conducted and finalised in Q1 2023.

Cultural Heritage:

In 2022, three additional cultural sites (tombs) were identified and protected by signage in the surroundings of DTP platform. These sites will not be removed. One gene residence was moved with the agreement of the community after conducting the necessary rituals and implementing established protocols. Geolocation information completed with the technical support of a specialised consultant has been provided to the mining department and contractors to avoid the cultural sites. The Community Relations team continues to engage with communities to determine the management protocol for each identified site and to train mine operations personnel in accordance with approved procedures.



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