

# **GAC PROJECT**

**Independent Environmental  
and Social Consultant**

**First Monitoring Site  
Visit Guinea November  
2018**



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First Monitoring Site Visit Guinea November 2018**

<b>Prepared for:</b>	<b>International Finance Corporation</b>
	<b>African Development Bank</b>

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## 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>CBG</b>	Compagnie des Bauxites de Guinée,
<b>CE</b>	Critically Endangered (on IUCN Red List)
<b>CHA</b>	Critical Habitat Assessment
<b>CIS</b>	Community Investment Strategy
<b>CLO</b>	Community Liaison Officer
<b>CNRN</b>	Community-based sustainable Natural Resources Management
<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>EPC</b>	Engineering, Procurement and Constuction
<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>FOOS</b>	First Ore On Ship
<b>GAC</b>	Guinea Alumina Corporation SA
<b>GIIP</b>	Good International Industry Practice
<b>GBV</b>	Gender Based Violence
<b>HC</b>	Human Capital
<b>HR</b>	Human Resources
<b>IBC</b>	Intermediate Bulk Container
<b>IESC</b>	Independent Environmental and Social Consultant
<b>IFC</b>	International Finance Corporation
<b>IR</b>	Industrial Relations
<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>MB</b>	Moyen-Bafing
<b>MBNP</b>	Moyen-Bafing National Park
<b>MIGA</b>	Multilateral Investment Guarantee Agency
<b>MoU</b>	Memorandum of understanding
<b>NG</b>	Net Gain
<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>PMC</b>	Project Management Consultant

<b>PS</b>	Performance Standard
<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>SOP</b>	Standard Operating Procedure
<b>SPV</b>	Special purpose vehicle
<b>STP</b>	Sewerage Treatment Plant
<b>TPI</b>	Technology Partners International
<b>TSS</b>	Total Suspended Solids
<b>UNDP</b>	United Nations Development Programme
<b>USTG</b>	Union of Workers of Guinea
<b>WCF</b>	Wild Chimpanzee Foundation
<b>WHO</b>	World Health Organization
<b>WI</b>	Work Instruction
<b>WWTP</b>	Waste Water 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 Action 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 development of a greenfield bauxite mine in the Boké province of Guinea, the construction of a port terminal with an offshore export berthing facility and a loading conveyor at Kamsar, and the construction of railway spurs connecting the bauxite mine and the port terminal to the existing railway system.

This report presents the IESC's findings from the first construction monitoring visit post financial close, undertaken in November 2018.

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

The Safety, Health, Environment and Community (SHEC) Policy sets the principles for GAC's operations considering the wellbeing of its employees, contractors, stakeholders and the community, along with the protection of the environment.

The SHEC Management structure for the construction phase has been amended slightly since the last IESC visit (May 2018), with the appointment of a new Safety, Health & Environment (SHE) Director. The SHE Director has overall responsibility for four main reports, namely the Project SHE Manager (Mine & Port), Operations Safety Manager (Mine), Operations Safety Superintendent (Port), and Environmental Manager, as well as the contracted health service provider which covers both the port and the mine. The Stakeholder Engagement Director continues to have responsibility over all aspects of social management (See Social Section below)

With the exception of the Waste and Resources Supervisor who reports to the Environmental Manager, all the key positions are filled, and little structural change to the teams reported. The IESC considers that the new SHE Director brings strong experience in delivering SHE teams in Guinea on similar projects, and has a number of pre-existing links to members of the GAC team which will assist in developing strong internal relationships.

With the forthcoming change from a construction to an operational organisation (post-First Ore On Ships (FOOS)) in mid-2019, GAC is starting to develop the organisational structure and staffing. This will require the appointment of some new personnel and also consideration of its transition planning, as the capacity within the Guinean members of the SHE and Stakeholder Engagement teams are developed, and the expat component is gradually decreased. The current plans for the environmental and social teams do not indicate significant change in the structure for operations, whereas the structure of the operations safety team have a clearer definition between mine and port, and involve the promotion of some Guinean staff.

GAC is committed to the development and implementation of a SHEC management system. The draft design of the Environmental, Health and Safety Management System (EHSMS) meets Good International Industry Practice (GIIP) and is aligned with ISO 14001, and identifies the main risks and impacts. Much of the documentation is already generated, but needs to be refined to fit the EHSMS structure and tightened up so that procedural descriptions in the plans are clearly described. Standard Operating Procedures (SOPs) and Work Instructions (WIs) need to be developed or formalised for most areas. A key element in the success of the EHSMS will be the clear interfacing between GAC's system and DTP's (the mining contractor) and VIVO's (fuel contractor), and this interface will be reviewed in the next IESC monitoring visit, specifically plans such as the Emergency Preparedness and Response Plan which is under revision.

GAC's assessment of the status of the EHSMS by the Environmental Manager was that the plans had not progressed significantly since the last IESC visit (the environmental element is estimated at circa 50% complete). In order to have the EHSMS in place for the start of operations, GAC has appointed consultants (Thor) and two of their experts (one health & safety, and one environmental) are starting in December 2018 with the intention of driving the completion of the EHSMS in conjunction with the SHE team. This is considered by the IESC to be a pragmatic and positive move, and the IESC will review progress on the EHSMS at the time of the next IESC monitoring visit. Social management plans and related procedures are in place and their implementation is managed with the support of the Borealis System.

### Environment

GAC's environment team is based at the Tinguilinta Camp (formally known as the Pioneer Camp) with the focus of effort dependent on the key construction activities and the environmental risks. As the mine plant area is developing and infrastructure has been installed, there has been significant effort on monitoring and rehabilitation of areas, and

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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).

similarly there has been significant effort on rehabilitation and planting around the dam. A focus of the team now needs to be preparing for the operational EHSMS, and bringing in additional resources to drive the preparation of the EHSMS forwards. The Environmental Manager supported by the SHE Director is the lead driver of this and other aspects such as the recruitment of the Waste and Resources Supervisor who will be responsible for the management of the new waste management area, operational waste issues, and resource management.

The Project is in a dynamic construction phase and therefore the current resource efficiency management is largely focused on tracking a few significant parameters such as monthly fuel usage. Once the Project moves into operations (post-FOOS), there will be the opportunity to track performance 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.

The construction of water abstraction and management systems are largely complete, and initial baseline monitoring has been undertaken. GAC is updating the Integrated Water Management Plan (IWMP), which will assist to define the water sourcing strategy, and should be used to direct the baseline monitoring, and respond to the results. There is a need to critically review the current water monitoring program to ensure that it is representative, repeatable, and provides more useful data to the Project to assist management decisions and identify long term trends which may affect the project (e.g. changing rainfall patterns).

At the Platform the use of seawater for the desalination plant, and the mixing of the treated wastewater with the brine discharge from the desalination plant, will require quality monitoring, and the potential salinity impacts on adjacent mangroves should be assessed and discharge outlets located to avoid impacts. GAC has internally raised the question of the design of the current creek road crossing and identified the need to remediate this to allow fuller tidal flows if the current structure is to remain in place. It is the IESC's understanding that this structure was always intended to be a temporary structure, and it is assumed it will be removed once the heavy equipment associated with the jetty and conveyor construction is demobilised, but agrees that if GAC decided to retain it, then remedial measures are needed.

Since the last IESC visit the management of waste has not changed significantly, however, it is recognised that there is now active construction of the new waste management facility near the Tinguilinta Camp, and that this will be completed by the end of January 2019. With the planned appointment (subject to finding a suitable candidate) of a Waste and Resources Supervisor, there should be better management and oversight of waste and its recycling. As the construction winds down to FOOS, waste generation will diminish and become more standardised which will further assist the waste management approach, however in the short term as the waste management facility is moved it is recommended that the stockpiled oil is moved promptly (ideally through the waste oil recycler) so as to reduce the risks of spillages, and (as planned) the use of ISO-tank adopted over intermediate bulk containers (IBCs).

The storm water management systems, which differentiate the run-off from potentially contaminated and non-contaminated areas, is evolving as construction progresses and no issues were identified by the IESC. Wastewater treatment capacity is due to improve in December 2018, as the operational wastewater treatment plant (WWTP) at the Platform is being commissioned, which will replace the undersized temporary system currently used. In addition GAC has commissioned experts to evaluate the operation of the Tinguilinta Camp WWTP with the aim of either improving its efficiency, and developing operational manuals, or determine if it needs replacing. The Technical Partners International (TPI) laboratory in the Tinguilinta camp is now monitoring the effluent discharges and has recently added coliform, BOD, and COD, to the analytical suite which will enable GAC to better monitor the efficiency of these WWTPs.

The Platform dewatering around the car dumper construction has ceased, and therefore the impact of the red precipitate on the mangroves is no longer occurring. The analysis by TPI of the creek water did not indicate any toxicity (although arsenic was not included in the analysis), however there is a significant deposit of red precipitate around the discharge point, which extends into the mangroves. It is recommended that this is subject to a full metal suite analysis (including arsenic) to assess whether there are any long term impacts on the environment (specifically biodiversity), and if any remedial measures are needed.

The Project's management of hazardous materials and pollution prevention is generally good, and continuing to improve as the final infrastructure with inbuilt management and mitigation measures are constructed in preparation for the operational phase.

Air, noise and vibration baseline monitoring has been undertaken across the southern (mining) part of the concession and the Platform. It is noted that this has extended across plateaus that will not be mined for many years, and it is recommended that the monitoring strategy should be reviewed and updated prior to the start of operations so that GAC maximises the benefit from the data gathered. To achieve this GAC could consider focusing the monitoring on the plateaus due to be mined in the next few years, and adding more granular focused monitoring around the active operational areas (including the plant areas). This would assist in evaluating the main impacts

generated by the Project, and allow the Project to implement any necessary mitigation measures to reduce the impacts on communities and workers. This monitoring should also include the Tinguilinta Camp (currently excluded) to allow an assessment of impacts to workers from noise or dust etc.

### **Health and Safety**

Health and Safety (H&S) is noted to be a key focus of top management and all morning meetings incorporate a review of H&S aspects, with notice boards implemented by Management to demonstrate and track performance. The monthly green book (a presentation on Project progress) includes details of the month's safety focus (e.g. mobile phone use guidelines), and H&S statistics, and highlights the key aspects such as the number of drug and alcohol tests, or training courses undertaken. Malaria rates have shown a rise in September and October above the 12 month rolling average (there were 31 cases reported for the workforce of 3,913), and this is a subject of increased focus.

GAC has strong crisis management documentation and has developed various components of an emergency preparedness and response plan (EPRP), although it lacks details such as community interactions. The EPRP requires updating to cover a number of missing areas and reflect the operational case. The areas not included at present include tying into VIVO's EPRP for the fuel delivery and distribution (and spill response), and incorporating the EPRP for the new dam. As part of the EPRP rollout and finalisation, there will need to be engagement with the local communities, such as those living downstream of the dam, so that they are aware of any emergencies which may affect them.

The IESC did not identify any significant concerns with regards to traffic management and safety, and notes that the offshore management plans (barge and fuel vessel traffic) are currently being developed.

### **Biodiversity**

The Biodiversity Team continues to be led by an internationally-experienced Biodiversity Specialist, working with two Guinean ecological professionals with specialities in aspects of both zoology and botany. The team reports to the Environment Manager, and is supported by several external contractors engaged to undertake specific field programs on GAC's behalf. Additional technical expertise will continue to be required for specialist studies and analyses, plus additional in-house team resource would help avoid fatigue and allow for adequate capacity building.

The time available during this monitoring visit was considered to be insufficient for discussion of general and species-specific control measures and a full review of implementation – future monitoring visits should be preceded by status reviews via teleconference to maximise the effectiveness of time on site. The IESC notes that GAC has distilled priority items from the previously approved Biodiversity Management Plan (BMP) and Biodiversity Monitoring and Evaluation Plan (BMEP) into an Implementation Strategy. Considering the remaining construction phase and imminent FOOS, GAC will update the Implementation Strategy following a fresh review of BMP and BMEP priorities. The biodiversity survey and baseline data is now being held within the Borealis data management system, and a suite of Indicators has been developed which will be used as a 'dashboard' to indicate progress on key performance measures.

The process by which ecological sensitivity data informs mine design and infrastructure planning will be a focus area for the next IESC monitoring visit, and it is noted that GAC is yet to formalise this process as it differs somewhat from that described in the approved BMP. A number of biodiversity surveys have been conducted during late 2017 and through 2018 including detailed chimpanzee surveys (including nest decay studies, transects, recces, DNA analysis of dung samples and camera traps) plus some wet-season freshwater fish, reptiles and amphibians. Analysis of the multi-faceted chimpanzee studies is yet to be finalised – the statistical analyses will be peer reviewed before the reports are completed. The late start of the rainy season, and challenges with species identification in the field, meant that the results from the fish and herpetology survey undertaken by GAC were not as productive as planned. The results of the chimpanzee survey will help inform decisions on the best locations and options for the onsite set-aside areas, which will provide not only protection for primates but also the priority restricted range species found on site. A visit was made by the IESC to a gallery forest near plateaus 2 and 3 which is of high ecological value (and low anthropogenic impact), and which GAC considers could potentially form part of an onsite set-aside in the northern part of the concession. From our brief visual observations, the site appeared to be a viable candidate for on-site protection, but a strategy for which site/sites should constitute the Project's on-site set-aside is due to be developed following the completed analyses of chimpanzee survey results, and further studies on those restricted range species that a set-aside should seek to protect.

The reservoir was full following the wet season which had finished a short time before the visit. The review of the surface water monitoring program, which includes the water flow and quality downstream of the Tiouladiwol dam, needs to commence asap to ensure the measures are in place to ensure that the ecological health of the Tiouladiwol is maintained. The IESC recommend considering whether water extraction for dust suppression is still required from the Tinguilinta, now that the reservoir is operational (once sufficient wet/dry season data on reservoir levels are available for analysis).

Rehabilitation of areas affected through construction to date has commenced, with active planting of native grasses, shrubs and trees, plus vetiver grass – data provided by GAC indicates rehabilitation planting has occurred across



4.23Ha at Kamsar, and across 7.25Ha at the mine site. Rehabilitation of plateaus post-mining will need to ensure sufficient natural habitat is restored; any contribution to the widescale conversion of natural habitat to cashew nut plantation will need to be managed very carefully and community land-use expectations managed whilst GAC has responsibility for restoration. It is understood that GAC is sourcing satellite imagery so as to gauge an improved baseline land-use reference point and condition status.

GAC's community-based natural resource management program has made good progress as implementation partners SyDev have conducted an extensive program of interviews of villagers across the concession. In addition, 25 para-technicians (ecological representatives) have been nominated by their villages to help implement GAC's resource management program and have undergone the first series of training workshops. GAC's wider responsibility for priority ecosystem service impacts and mitigation measures has undergone a gap analysis to ensure all aspects are linked into either biodiversity or social programs.

GAC continues to participate in the Moyon Bafing National Park chimpanzee offset; progress for the period 2018-2020 is being reported directly to Lenders according to the seven agreed management objectives.

To offset the residual biodiversity loss associated with platform and container terminal construction, GAC's program of mangrove restoration has begun a review following the apparent failure of 2017 restoration efforts at Taïdy (restorative planting of mangrove propagules at both offset sites, Taïgbé and Taïdy, have failed to successfully deliver areas of restored mangrove to date). The IESC reiterates the importance of seeking specialist technical expertise with not only successful mangrove restoration experience, but also with international experience in designing/implementing offset programs. As noted above the discharge from the Kamsar Platform car dumper dewater, which caused the red precipitate in the adjacent creeks reported during our last visit, has now ceased and while there is no visual evidence of impact a detailed assessment has not been undertaken. As detailed above, it is recommended GAC undertake baseline sampling to better understand whether there was any significant detrimental effect to the mangrove critical habitat in the Dougoufissa Creek and tributaries.

GAC's collaboration with five other bauxite mining companies as part of the Bauxite Environmental Network (BEN) has made progress. A memorandum of understanding (MoU) has now been signed and a plan of action with specific deliverables agreed for 2019. The network is currently seeking supplemental funding to help implement the program. Although GAC has led the network since inception, the position of Chair has now been passed to the Chamber of Mines of Guinea. The IESC recognises that overall success of the BEN collaboration is outside of GAC's control, but commends the initiative as part of GAC's overall effort to address cumulative impacts.

Invasive species management has become more systematic but does need some improvement in weed disposal techniques. With FOOS imminent, it is a good opportunity to reassess the potential risks to the project from invasive species whether at mine or port site and refresh the invasive species management plan.

### Social Management

The Stakeholder Engagement department manages social aspects of the GAC operations. It is organized in three main areas: Community Relations, Resettlement and Compensation, and Social Investments, under the supervision of the Community Manager who reports to the Stakeholder Engagement Director. The Stakeholder Engagement department currently has a total of 22 staff and 27 people hired on a contract basis. The Stakeholder Engagement team is working at full capacity and any reduction on the staff will likely compromise the ability of GAC to manage community relations prior to FOOS and as operations consolidate. GAC needs to ensure that adequate resources are maintained by extending as appropriate the contracts or permanently hiring people on key positions such as Community Relays<sup>2</sup>, among others to guarantee the right resources are committed to the required roles.

The Stakeholder Engagement teams (i.e. Community Relations, Resettlement and Compensation and Social Investment) work together supporting each other's functions based on the specific workload and distribution in the field at any given moment. This flexibility is seen as a strength of the organization; however, it is important to have clear responsibilities and job descriptions for each functional team and their respective leaders to ensure there are no gaps in the implementation of plans and programs and ensure accountability.

A Stakeholder Engagement Plan (SEP) and a Community Investment Strategy (CIS) are under implementation. Both documents are being revised for the operations phase. GAC should review the SEP, and community investment programs to ensure all actions outlined in the Gender Strategy are being implemented. Similarly, the human resource plans and programs should be revised to ensure all internal actions of the Gender Strategy are implemented.

Labour and working conditions are managed by the department of Human Capital (HC). The Director of HC reports to the CEO, and has 10 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.

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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



In the Code of Business Conduct and Internal Regulations, GAC states its commitment to provide adequate working conditions, and comply with requirements of non-discrimination and equal opportunity, freedom of association and rejection of child and forced labour, and is committed to local hiring requiring contractors to hire local workers whenever possible. A strategy to substitute expatriates with Guinean nationals is being developed.

GAC has negotiated a collective agreement with the Union of Workers of Guinea (*Union Syndicale des Travailleurs de Guinée* – USTG) that guarantees uninterrupted work until FOOS. GAC supervises working and labour conditions of contractors. In 2018 there have been 22 blockades/work stoppages, five of which were worker-led and 17 organized by the community, causing project delays. Most of the worker-led stoppages were during the first and second quarter, with the last blockade taking place in June. The implementation of a demobilisation program and a succession program to substitute expatriates with Guinean Nationals is expected to reduce the risk of blockades during the remaining construction period, and also reduce high rotation of personnel.

GAC has two grievance mechanisms in place, one managed by HC and the other one managed by Compliance. Contractors have their own grievance mechanisms that are supervised by the Project area through the Project Management Consultant (PMC) Industrial Relations (IR) department. A total of 216 workers grievances had been reported during 2018, of which nine were still opened at the time of the site visit. Although HC, IR and Compliance communicate as needed to ensure every grievance is addressed and resolved, there is not a coordinated effort to integrate management and analysis of workers grievances. GAC would benefit from developing a mechanism to integrate and analyse all workers grievances in order to ensure consistency, identify trends, and implement measures to avoid causes of complaints and anticipate and avoid potential conflicts.

GAC has completed a Community Risk Register focused on determining potential risks to communities from the construction and operations phases of the project. The Community Health and Safety Plan refers to related plans to reduce and mitigate risks.

GAC has a 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. GAC should expand its safety measures to water safety through awareness and training to the communities around the dam and set signs both at areas where community members can access the shores of the dam and at the river crossing in order to prevent accidents.

The site assessment and management plan for any future exploitation of the Tinguilinta Quarry (at the time of the IESC visit the quarry had ceased being used) does not include specific measures to communicate with community members and sets a control of 500 m radius for blasting instead of the 800 m established in the Social and Environmental Impact Assessment (SEIA). GAC needs to review its assessment procedures and control measures to ensure all potential impacts to community members are considered and mitigation measures implemented in all work sites are aligned with the approved environmental and social management plans (ESMPs). A minimum buffer zone should be established from villages and permanent residences, and if the review of drilling and blasting procedures justifies a 500 m buffer zone, the relevant ESMPs should be amended and aligned with this.

A Project Induced In-Migration (PIIM) Management Strategy and an operationalization plan are in place and being implemented by the Influx Migration Management Superintendent under contract. GAC is engaging with local and regional authorities and other companies with presence in the region to better manage influx and its impacts. In consultation with approximately 1,000 representatives of state technical services, local authorities, civil society and community members, GAC has identified positive and negative effects of regional in-migration, and ten priority actions for influx management. GAC needs to develop a clear plan to implement these actions in consultation with local and regional authorities, and civil society, identifying partners and defining responsibilities for implementation and funding.

GAC has in place a Security Management Plan (SMP) that is mostly adequate, and is increasing its physical security arrangements. A MoU is currently being discussed with the government to detail how public security forces are to be engaged when necessary. The MoU will include provisions to act within the Voluntary Principles of Security and Human Rights. The SMP needs to be revised to account for new arrangements and fully comply with lenders requirements, incorporating measures to manage risks to communities posed by GAC's security arrangements.

Resettlement Action Plans (RAPs) have been developed and are being implemented for physical displacement in Beli Kindy and Filima, and for economic displacement for the construction of the conveyor in the port area, the dam and pipeline in the north part of the concession, and plateaus 20 and 26 in the southern part of the concession. Physical resettlement of residents of Beli Kindy and Daprass has been concluded, and livelihood restoration programs are being implemented successfully. Resettlement of the artisans from Daprass, however, has not yet been resolved as GAC deviated from the plan due in part to unexpected circumstances (including land issues for the construction of the business park) outside the control of the company. GAC should conduct a socioeconomic study of the artisans to assess their current situation, and develop measures, focusing on the most vulnerable, to ensure they have the means to restore their livelihoods. This may require providing assistance to build adequate workshops in the designated area of Filima, as some artisans have requested.

The community of Beli Kindy expressed their satisfaction with livelihood restoration programs and the construction of community facilities. However, there is frustration from the community regarding the solar panels provided by the company, which the community said did not provide the power committed by the company (the IESC

understands that new, smaller and more powerful solar panels have since been acquired by GAC), lack of replacement pastures for herders, and delays in compensating for community land. In accordance with the RAP and lenders requirements, compensation for land will be provided in-kind rather than cash.

Compensation to individuals affected by the pipeline and access roads has been concluded, however, compensation for community land to be done through development projects is still pending. GAC has transferred the funds to a dedicated account. It is expected that the account will be jointly held by the community, the Rural Development Community (Rural Development Community – CRD), and GAC, to ensure transparency and implementation of projects that benefit the community, and contribute to the implementation of local development plans. Joint mechanisms for decision making, such as a Steering Committee will be established.

A specific assessment of impacts to fishers from the changes in the procedures for loading ore on ships was undertaken in December 2017, showing marginal effects on fishers' mobility and safety risks, as the traffic increase is limited in relation to that that already exists on these routes. The assessment includes additional mitigation measures but recognizes that a quantitative assessment needs to be conducted. The assessment should be supplemented prior to the start of operations to fully understand risks, and justify mitigation measures. GAC should also start implementation of measures described in the RAP related to fishers' safety, including sensitization sessions in Taïgbé, Taïdy and Port Nene.

GAC reported adequate progress on the implementation of recommendations from the completion audits of resettlement in the northern part of the concession and Daprass, conducted in 2005 and 2008 respectively, such as livelihood support through the development of market gardens and rice paddies.

GAC is taking additional land for borrow pits, and is considering taking an additional significant area of up to 300 ha (174 ha of agricultural land) for rock storage, which are areas that were not considered in the original SEIA. At the time of the IESC visit a decision had not been taken whether there was a requirement for the rock storage area, and therefore if there was a need to acquire the land, and this will be followed up on the next IESC visit. For any such developments, as per lenders requirements, GAC should conduct a study to identify risks and impacts and consider alternatives to avoid, minimize, mitigate and compensate any impacts. To manage such potential land take, GAC needs to develop a strategic plan identifying all areas that will or may be required by the project in the mid to long-term. The plan needs to be used by the Community Team to reduce the risk of community members establishing themselves on replacement land that will eventually be used by the project, and for the Biodiversity team to determine any potential ecological sensitivities in the area that might require avoidance or mitigation measures.

In February 2018 a bushfire destroyed agricultural production and other assets of Beli Kindy community members. GAC informed that according to their investigations, the fire was not caused by the project. However, the Prefectural Department of Environment, Water and Forests of Boke conducted an investigation that concluded that those responsible for the bush fire were GAC and its subcontractors, and requiring the Project to compensate all 62 affected people for their losses. GAC's internal investigation report was not provided to the IESC, by the time of drafting this report. Based on the available information, GAC should pay the compensation as indicated in the cited report of the Department of Environment, Water and Forest, dated May 2018. The IESC will review this matter during the next monitoring visit.

The cultural heritage survey conducted as part of the SEIA baseline information gathering exercise covered all plateaus and valleys between them and an additional 300 m zone. Within the mining areas in DTP's 5-year plan for the exploitation of plateaus 20 and 26 there are two genie residences. One replicable genie residence is located in the central part of plateau 26 and one non-replicable is located within DTP's planned area, but just south of plateau 26. The sites are identified and mapped and GAC will ensure the sites are managed in accordance with the Cultural Heritage management plan.

## ANNEX A – ESAP STATUS TABLE (Update of active items on ESAP November 2018)

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update November 2018
<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. 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;	<p>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.</p> <p>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.</p>	<p>Refine EPRP and define project facilities and emergency situations to be addressed, incorporating lender guidelines.</p> <p>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.</p> <p>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 include local authorities in the plan.</p>	<i>Before Financial Close</i>	Revised EPRP	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	<b>In Progress</b>  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.	<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.
<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>									

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Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update November 2018
R0001/17	13	D3.1.1  3.1.2  6.1.2B	<i>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.</i>  <i>New data is now available which influences the assumptions and conclusions of the IWMP and a revision is required.</i>  <i>The IWMP for the reservoir area needs to better define requirements to ensure protection and conservation of downstream biodiversity</i>	<i>GAC to evaluate all opportunities to minimise water use, and reduce environmental (including dust suppression) and social impacts.</i>  <i>As part of this GAC to update the IWMP for the project to include:</i>  <i>– The results of the groundwater testing and whether supplementing the water supply from groundwater is a feasible option.</i>  <i>– Add detail on the decision process GAC is to follow to trigger the move from river to dam water supply.</i>  <i>– 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</i>  <i>– 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</i>	<i>Before Operations</i>	<i>Updated IWMP Plan</i>		<i>The IWMP update is in progress. The updated document needs to take account of baseline data collected to date, and also direct the future focus of the monitoring, so that the management of water (surface and groundwater) can be undertaken in an informed manner. The IESC anticipates that this item should be closed during the next monitoring visit, pending our review of the updated IWMP.</i>	
R0002/17	14		<i>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.</i>	<i>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.</i>	<i>Before Operations</i>	<i>Details Water Monitoring and Management Plan</i>		<i>Water Monitoring and Management Plan – This has not been fully developed. The recent reports from TPI are a useful first step, and the plan should be developed from these, and tie into the overall IWMP which is being developed. 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 &amp; BMEP given the presence of aquatic critical habitat species.</i>	
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>  <i>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 under ESAP items 13/14.</i>	

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Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Update November 2018
R0005/17	17	D3.2.2	<i>Air model impacts were assessed in SEIA Addendum based on generic assumptions regarding equipment and operations. This may not be reflective of the impacts 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.</i>	<i>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 Addendum (set at medium) is correct, and provide justification for the assumptions on expected emission reductions used in the mitigation scenarios.</i>	<i>Prior to start of Operations</i>	<i>Air modelling report update/ addendum, and air quality monitoring and management plan</i>			<i>Air Modelling Report update/ addendum, and air quality monitoring and management plan - GAC report that the ToR has been produced and this Air Quality Model ToR (if not the new model) will be reviewed during the next monitoring visit in 2019.</i>
R0006/17	18	D3.2.4	<i>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).</i>	<i>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.</i>	<i>Prior to start of Operations</i>	<i>Detailed fuel handling procedure(s)</i>			<i>Detailed fuel handling procedure(s) - Progress is being made and IESC anticipates that this item will be closed on next monitoring visit in 2019, assuming the documentation discussed has been prepared and rolled out. The physical containment for the pipelines was being installed at the time of the November 2018 monitoring visit.</i>



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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>			<p><b>CLOSED</b></p> <p>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.</p> <p>The IESC will continue to assess the effectiveness of this system and compliance with the restoration requirements during the next monitoring visit, in conjunction with the recommendations for the development of a strategic plan for all future land acquisition needed by the Project.</p>
R0008/17	20	D3.2.6	<i>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.</i>	<i>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.</i>	<i>Prior to the start of operations</i>	<i>Quarry Management Plan</i>			<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	<i>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.</i>	<i>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.</i>	<i>Prior to landfill construction</i>	<i>Report detailing the planned landfill design.</i>			<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	<i>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.</i>	<i>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.</i>	<i>Prior to landfill construction</i>	<i>Landfill management plan and procedures</i>			<p><b>CLOSED</b></p> <p>See comment above on ESAP item 22</p>

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R0012/17	24	D3.2.12	<p>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 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>	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			Positive progress is being made – A contractor has been engaged to report on best method for repairing/rehabilitating the Sewage Treatment Plant (STP) unit, and improving its efficiency, and enabling bio-solids to be removed from the system. Management of bio-solids has been incorporated into the WMP v02, and GAC intends for bio-sludge to be solar-dried on flat bunded/bioremediation pad, and then added to composting material. IESC will review progress and GAC's proposed strategy on the next monitoring visit.
R0014/17	26	D6.2.3	<p>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.</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)		IESC to review Mine Rehabilitation and Closure Plan (due for completion May 2019) on next Monitoring Visit, with a specific focus on the end-point restoration intentions
<b>PS4 Community Health Safety and Security</b>									
C0004/17	30	D4.2.1 4.2.2 4.2.3	<p>Guiding principles for hiring, training, equipping and monitoring security personnel for the mine and</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	Before Financial Close	Security Management Plan	GAC - Security management plan.pdf	Completed	<b>ADEQUATE</b> The security management plan is completed and mostly adequate. The plan needs minor



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		4.2.4 4.1.1	port areas and other facilities and operations, including Conakry office and transportation routes, are not defined and consolidated in a Security Management Plan.	security personnel, rules of engagement, vetting process for security 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					adjustments. An MoU with the Ministry of National Defence through which a military attaché has been appointed to liaise with the company is in place and being implemented. GAC is in the process of putting in place an additional MoU with government security forces to detail how public security forces 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 2018, 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.
<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 have provided written clarification that they do not intend to develop fisheries in the reservoir, but will not prevent communities fishing as they do now.  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'	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).  GAC to update BMEP to include appropriate management approach(s) to community fishing to avoid any over-exploitation of the fishery resources.  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.	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

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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. 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>	By start of Operations	<p>Revised appropriate mine/drilling management plans detailing PCBS review</p> <p>Develop a remote sensing program.</p>		<p>The land disturbance permit process as presented in the approved BMP (Appendix 4) has been adapted into part of a wider Activity Based Environmental Method Statement (ABEMS) process (detailed in ESAP ID- 19 above). We were informed that an assessment of whether a PCBS is necessary, and its subsequent undertaking when required, is a mandatory pre-requisite input into GAC's ABEMS process. An example Biodiversity Checklist and associated ABEMS for one land disturbance event has been provided to the IESC to demonstrate the process. Whether this allows for sufficient time/opportunity for PCBS findings to inform any necessary avoidance decision-making will be reviewed in future visits.</p> <p>The Environmental Buffer Zones (EBZ) are now part of the Mine Plan GIS. A systematic process to capture decision-making in those instances where encroachment into an EBZ might be justified was discussed. Retention of appropriate wildlife corridors will need to be factored into road layout and infrastructure design.</p> <p>The IESC understands that GAC is gathering remote sensing imagery for the purposes of establishing a pre-project reference dataset. The ongoing analysis of land-use change will continue to be an IESC focus area, and the progress in the integration of biodiversity information into mine planning/EBZ will be reviewed during the next monitoring visit</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>Following clarification from GAC, this action item relates not to a biodiversity buffer requirement, but to minimising safety risks and air quality/noise nuisance to people. We therefore close this ESAP item, but refer back to the IESC action item M1.21, where the IESC outline the need to establish a minimum buffer zone from villages and permanent residences, and that this is captured in the approved ESMP.</p>	
B0007/17	38		<p>A BMEP has been developed. This provides the framework for monitoring priority species at both the mine and port 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.</p>	<p>Develop work plan for first year of BMEP implementation.</p> <p>GAC to review the BMEP suite of indicators to ensure efforts are focussed on obtaining the most relevant data across priority species/habitats.</p> <p>Commitment to initiate set-up phase of Feasibility Road-Map.</p> <p>GAC to initiate regular progress updates for Lenders/IESC (e.g. monthly) on steps towards Moyen-Bafing offset design and implementation.</p>	By start of Operations	<p>1<sup>st</sup> year workplan</p> <p>Revised BMEP</p> <p>Initial status update</p>		<p><b>CLOSED</b></p> <p>Workplan developed. Evaluation of this workplan against Lender requirements 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.</p>	

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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.	GAC to provide details of on-site set-aside once forthcoming chimpanzee surveys by EEM are completed.  Once initial design of the long-term chimpanzee monitoring program is completed, integrate this into the Project's BMEP (in accordance with the BMP).	Before start of Operations	Chimpanzee survey analysis and on-site set-aside delivery plan.			Chimpanzee survey analysis and on-site set-aside delivery plan – results of the work not fully available in November and IESC will continue to be reviewed during future monitoring visits.
B0010/17	41	D6.2.6	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 Taigbé 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 Taigbé were recently lost due to storm surge  The scope of works for the offset includes the requirement for an independent critical assessment review of the offset to assess its effectiveness.	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.  Undertake the planned independent critical assessment review of the first 2 years of offset, to assess progress against objectives and requirements.  Following construction, GAC to provide an updated assessment of loss (mangrove footprint) for offset purposes	By start of Operations	Monitoring and Evaluation Plan  Critical assessment review  Updated Conservation Loss Footprint	Rapport d'achèvement projet mangrove Kamsar VF.pdf		Latest results indicated that the Mangrove Rehabilitation Project was not as successful as anticipated, GAC is performing a review and should seek external specialist technical guidance. This will continue to be reviewed during future monitoring visits.
B0012/17	43	D6.3.1	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.	GAC to map the EcoS mitigation measures between those in the EcoSA, and BMP, and mapping these to the LRP, CIS, PIIM, etc.	By start of Operations	EcoS gap analysis mitigation measures report.			A preliminary gap analysis has been completed and IESC will follow up on the gap analysis during next monitoring visit

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B0013/17	44	D6.3.1	<i>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.</i>	<i>GAC to review the level of residual significance allocated to assessed priority EcoS impacts</i>	<i>By start of Operations</i>	<i>Revised EcoS Assessment</i>			<i>GAC considered that the residual impacts on ecosystem services are being mitigated through the project with SYDEV. The SYDEV reports provided were in French and IESC will follow up on progress during our next visit.</i>
B0014/17	45	D6.3.1	<i>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.</i>	<i>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.</i>	<i>By start of Operations</i>	<i>IBP EcoS Oversight Plan</i>			<i>The IESC is encouraged by the first meeting between biodiversity and community teams, but 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.</i>
<b>PS8 Cultural Heritage</b>									
H0001/17	47	D8.1.1	<i>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.  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.</i>	<i>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.</i>	<i>Before the start of Operations</i>	<i>Cultural Heritage Management Plan</i>			<b>CLOSED</b> <i>Discussion during the November 2018 Monitoring Visit indicated acceptable progress and this is considered closed, but will continue to be monitored.</i>

ANNEX B – ESAP STATUS TABLE (From ESAP Certification Visit May 2018)

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment	IESC Compliance Review May 2018
<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. 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>			<i>IESC understands that discussions on this are ongoing. IESC will seek to clarify the situation on the December 2018 monitoring visit.</i>

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M0002/17	2	D1.5	The ESHS organizational capacity and competency of GAC remains to be finalized.	GAC to define roles for key positions including EHS Director, Stakeholder Engagement Director, Integrated Business Planning Director, Influx Management Coordinator, Environment and Biodiversity Coordinators.	Permanent Positions to be filled by end December 2017	Revised organisational chart including job descriptions.	EGA-GAC Organigramme Situation 2018 MASTER update 201802.pdf	Completed  Influx Management Coordinator recruited and has arrived on site in February. Koïkoï Toupou has 25 years of experience in managing development projects, including 7 in supervision and animation of local development activities. He has experience in managing influx migration in the context of mining projects, having worked for Rio Tinto/Simfer in this capacity.  Stakeholder Engagement Director recruited. has arrived on site early December 2017: Douglas Perkins	<p><b>OPEN</b></p> <p>SHE Director (Mark Eadie) and Stakeholder Engagement Director (Douglas Perkins) at EXCOM level.</p> <p>The new proposed structure under the Env Manager (Pieters Andre), and presented to the IESC during the May visit, comprises three divisions: <b>Environmental Monitoring and Compliance, Biodiversity, and Waste/Resource Management.</b> These are considered to be appropriate although other than the biodiversity division, the other divisions positions are largely vacant. GAC is working to fill these and the use of the consultancy TPI is considered to enable them to achieve their environmental compliance and monitoring needs. Waste/resource management position needs to be filled to drive this area forwards, but in the short term is not considered to pose significant environmental risks provided current procedures are enforced and GAC draws on the skills of the team at Kamsar.</p> <p>The Biodiversity team capacity and capability has been enhanced since our previous review, with Benoit Limoges now in place (12-month contract) supported by Samba Barry. This resourcing level will need to be maintained (at least), in order to achieve the required priority aspects of the work program.</p> <p>The Stakeholder Engagement/Community structure provided in February 2018 comprises three divisions: <b>Community Projects, Community Relations and Resettlement</b>, under the Senior Manager, Community (Jean Bruno Ramahefarivo) who in turn reports to the Stakeholder Engagement Director (Douglas Perkins). The Influx Migrant Management Superintendent (Koikoi Toupou) is mapped to the Resettlement division. During the April visit, the IESC was informed that the structure is being modified, partly due to the advanced stage of the resettlement process requiring less personnel in that capacity. Resettlement personnel will take a more active role in community relations and Community Liaison Officers (CLO) will be engaged in affected communities. The latest information provided by GAC shows a reduction of</p>
			There is active recruitment to fill the gaps in the ESHS structure through direct appointees and temporary contracts and or consultancy firms. Specific details are needed on structure and personnel at all levels to demonstrate that GAC has the capacity to deliver the ESHS MS and commitments.	Re-evaluate the size/capacity/seniority of the biodiversity, environment, and social team to ensure increased capacity and resilience in staff resources.					



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				In the interim, GAC should urgently sub-contract appropriately-skilled biodiversity, environmental, social resources, to address urgent project delivery needs.					<p>5 individuals from 28 to 23, a compliance officer has been added and the Influx Migration Management Superintendent is not included in the Community structure. The structure presented in February is considered to be mostly adequate if, as indicated, people assigned to resettlement, both in Kamsar and the concession, take a more active role in community relations, and if CLOs are engaged to support stakeholder engagement and community relations, as indicated by GAC.</p> <p>This ESAP item is considered to be partially addressed and does appear to be being actively addressed. However, it will require on-going monitoring and remains open subject to a number of key appointments and detailed review of staff competencies.</p>
M0003/17	3	D1.4; 1.7	<p>GAC is continuing to proactively manage its ESMS, and there have been management efforts to ensure that all contractors are aware of the ESMS and lender requirements.</p> <p>While there are revisions underway, the limited capacity of the environmental team due to staff turnover over the last few months has meant that the process of updates including internal cross references, and cross reference to/bridging documents with, contractor procedures and how these apply to sub-contractors, has been lacking.</p>	<p>GAC as part of the on-going development and implementation of its ESMS to address the following:</p> <ul style="list-style-type: none"> <li>- Update the Integrated SEMP, to reflect the current range of E&amp;S plans and the new management structure.</li> <li>- Ensure that actions from the IESC's <i>Cmts_GAC Management Plans and Procedures_11_5_17.doc</i>, issued on the 11 May 2017 are addressed in the latest versions of the plans</li> </ul>	Before Financial Close	Updated SEMP and appended E&S plans	<p>9100-S-CPL-00003 Rev A Integrated SEMP 2017122.docx GAC Plans Procedures December 2017.xlsx</p> <p>9000-O-CPD-00016-GAC Drilling Blasting Standard Operating Procedure.pdf</p> <p>9000-S-CPD-00024 Rev 3 Traffic and Vehicle Management.doc</p> <p>9000-S-CPD-00081 Rev 1 -Air Quality and Greenhouse Gases</p> <p>9000-S-CPD-00061 Rev 2 Waste Management Procedure.docx</p> <p>9000-S-CPD-00025 Rev 3 Hazardous Substances and Dangerous Goods.docx</p> <p>9100-S-LCE-00001 Rev 5 GAC SHE Requirements.docx</p>	Completed	<p><b>COMPLETED subject to further review in December 2018</b></p> <p>GAC has updated the highlighted plans and based on the IESC review these have generally addressed the IESC's comments from May 2017.</p> <p>GAC's assessment at the time of the IESC visit in May 18 was that the full operational set of E&amp;S plans still requires work (circa 40-50% complete), including improved document control procedures.</p> <p>The IESC considered that the plans are sufficient for this stage of the project, but will require a detailed review to assess their adequacy for the operational phase on subsequent IESC visits. These will need to fully reflect the evolving management structure and roles and responsibilities.</p>



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				- Communicate updates to all contractors, and define a compliance audit programme which ensure compliance by contractors and their subcontractors.					GAC have developed a procedure to undertake SHE audits of their contractors
M0004/17	4	D1.6.1; 1.6.3;	<p>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.</p> <p>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.</p>	<p>Refine EPRP and define project facilities and emergency situations to be addressed, incorporating lender guidelines.</p> <p>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.</p> <p>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 include local authorities in the plan.</p>	Before Financial Close	Revised EPRP	<p>GAC EPRP process_v1.docx Emergency Response Scenarios_ALL_14Dec2017.pptx</p> <p>Emergency ResGAC DAM EMP draft-EN-V1-20171224.docx 0254472 GAC Dam Breach report 20150325.docx</p> <p>GAC_Crisis Managagement_Guidebook_v20170908.pdf</p> <p>GAC_Crisis Managament Manual.docx</p> <p>Loi_Gestion_Catastrophe.docx Plan_National_Gestion_Catastrophes_1994.docx</p>	<p>In Progress</p> <p>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.</p>	<p><b>ACCEPTABLE</b></p> <p>The IESC considers that GAC has made acceptable progress on this ESAP item for Financial Close, but requires further action before the start of operations. The immediate action is to finalise the GAC Crisis Manual, and update the Emergency Response Plan for the dam now that it is built.</p> <p>Documents provided indicate that GAC appears to have addressed the actions listed in the ESAP. Importantly GAC recognise that further work is required, and updates needed to reflect the changing situation e.g. resettlements are completed, and the dam construction is due to be completed and filled in the 2018 wet season.</p>

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M0005/17	5	D5.1.3	It is not clear what the level of potential loss of access to resources, and safety risk for fishermen in the port area will be from the revised shipping arrangements.	GAC to conduct an additional assessment of the impacts to fishermen in the port area considering the changes to the design of jetty structures, management, and maritime transfer operations, and, as required, develop revised mitigation and compensation measures.	<i>Before Financial Close</i>	Assessment of impacts on fishermen and mitigations	0431221 Revised Fishermen Impact 20171220 Clean.docx	Completed	<p><b>COMPLETED</b></p> <p>The document provides a qualitative assessment on impacts to fishermen considering the change of project design. The report indicates that "a more quantitative assessment of the impact of the Project induced barges traffic" is necessary and will be conducted. It includes additional mitigation measures and concludes that during the construction phase there will be a reduction of impacts compared to the previous design, but some impacts will be greater during operations. Before the start of operations, as indicated in the report, an additional assessment should be conducted based on fishing routes, fishing grounds and fish catch surveys.</p> <p>The report also indicates that GAC "undertook some site visits and fishermen consultation in November 2017..." It is not clear the level of consultation conducted; however, based on meetings with fishermen during the April site visit, consultation appeared to not have been adequate, and additional, meaningful, consultation with fishermen and fishmongers should also be conducted.</p>
M0006/17	6	D1.8.5; 5.2.1	GAC has been implementing a "de facto" gender strategy, and has non-discrimination and equal opportunity policies. GAC has indicated that a formal gender strategy will be developed. This gender strategy is yet to be formalized.	GAC will develop and implement a gender strategy to ensure women are being supported and are not disadvantaged in the development process. The gender strategy will be applied in the implementation of the SEP, CIS, RAPs, Community H&S Plan, Agricultural Development Strategy and all other relevant community actions.	<i>Before Financial Close</i>	Gender Strategy	GAC Gender Strategy final 20171221.docx	Completed	<p><b>COMPLETED subject to approval by GAC management</b></p> <p>The document includes internal (workers) and external (communities) focus areas to mainstream gender into aspects of project operations creating equal opportunities and mitigating gender specific project risks through implementation of human resources as well as stakeholder engagement, land acquisition and resettlement, community investment and social and environmental management.</p> <p>The IESC considers the document to be adequate. However, it was presented in draft version and management approval is required. Minor suggestions are provided to improve the document. Implementation across the different plans and programs will be reviewed during IESC monitoring visits.</p>

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<b>Assessment and Management of Environmental and Social Risks and Impacts – Stakeholder Requirements</b>									
K0001/17	7	D1.8.1	The Stakeholder Engagement Plan (SEP) has not been finalized	GAC to finalise the SEP, including the incorporation of a procedure for land access.	<i>Before Financial Close</i>	Finalised SEP	9970-S-CPL-00001 Rev 1 Stakeholder Engagement Plan -20171221.docx	Completed	<p><b>COMPLETED subject to approval by GAC management</b></p> <p>Revised Stakeholder Engagement Plan and procedure for land access provided are considered to be adequate. However, they are presented as draft documents and need to be finalized and approved by management.</p> <p>During the site visit it was confirmed that the land access procedure is in implementation. GAC informed that the SEP is being reviewed and revised for the operations phase. The revised SEP should be developed prior to the start of operations. Implementation will be reviewed through the monitoring visits.</p>
K0002/17	8	D1.8.3	Community members are not always informed prior to GAC entering their land for project activities that may affect their assets.	GAC will develop a procedure to ensure that all potentially affected stakeholders, including landowners and land users, are informed prior to GAC or its contractors entering their land and conducting activities. Procedure to be referenced in the SEP.	<i>Before Financial Close</i>	Land access procedure	Land access - Consent Release form 20171219.xls LAND ACCESS PROCEDURES (rev3) 20171219.doc Land Access Request Form 20171219.xls	Completed	<p><b>COMPLETED</b></p> <p>Land Access Procedure is considered to be adequate. Implementation will be reviewed throughout IESC monitoring visits.</p>
K0003/17	9	D1.8.5	Community Investment Strategy (CIS) does not include identification of, or considerations to address, development aspects of vulnerable people. Ecosystem services are not clearly identified as a consideration in the selection and development of projects/actions.	GAC will finalise the CIS. This will establish a clear distinction between Social Investment and mitigation and compensation measures; define how vulnerable people will be identified and their concerns addressed; include principles for consideration of Ecosystem Services (EcoS) and reference relevant plans and strategies including EcoS Oversight Plan and Agricultural Development Strategy.	<i>Before Financial Close</i>	Finalised CIS	2018 04 119 ERM - GAC CIS Clean.doc	<p>The CIS has been updated to integrate comments. However, the original document was prepared in 2016 it is felt that it needs to be reviewed in depth to take into account the evolving situation in the project area. It is expected that the review will be completed by the end of Q2.</p>	<p><b>COMPLETED</b></p> <p>CIS has been developed and as such the action is considered complete. However, since GAC will not be implementing the CIS as approved and is developing a new strategy, further action is required before the start of operations. The revised CIS needs to be submitted and approved.</p> <p>Community Investment Strategy provided is considered to be adequate. In order to successfully address ecosystem services, considerations will require a more integrated, collaborative working relationship between the Environment and Community Teams (See ESAP ID-45). GAC has proposed to redefine the strategy to take into account evolving situation in the project area.</p>

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<b>PS2 Labour and Working Conditions</b>									
L0001/17	10	D2.1.1	GAC does not have an integrated Human Resources Policy integrating all requirements related to Working and Labour Conditions and Labour Rights, that facilitates full understanding of such rights by all workers.	GAC to develop a Human Resources Policy that includes approach to respecting labour conditions and labour rights including freedom of association, equal opportunity and non-discrimination, no child or forced labour, retrenchment and a labour grievance mechanism.	<i>Before Financial Close</i>	Human Resources Policy	Human Resource Policy Statement V1 FINAL SIGNED - 20180201_151759	Completed	<b>COMPLETED</b> The IESC considered the policy to be adequate. Implementation will be reviewed throughout IESC monitoring visits.
L0002/17	11	D2.1.3	The project requires a considerable workforce which GAC and its contractors are procuring from local communities, the region and the national level. Mainly skilled workers are being accommodated in camps, while semi-skilled and unskilled workers are expected to provide their own accommodations. GAC does not have defined workers' accommodation standards.	GAC will develop and implement a Workers' Accommodation Management Plan that includes workers' accommodation standards and guidelines, and monitor workers accommodation conditions of direct and contractors' workers. The plan will include considerations for workers transportation.	<i>Before Financial Close</i>	Workers' Accommodation Management Plan	A8GA-00000-01-RP-008_RA_Meals and Accommodation Standard.pdf GAC WFH Strategy 20171201a.xlsx	Completed For the construction phase GAC has prepared an Accommodation & Meal Standard that is referenced in the various Project contracts as a requirement under the Project Industrial Relations Management Plan. The Accommodation and Meal Standard among other requirements specify minimum compliance with the IFC Standards. The accommodation and meal standard applies to accommodation, dining facilities, food preparation, potable water, etc. For the operations phase, GAC has prepared and will implement a workforce housing strategy (WFHS) that includes accommodation standards and guidelines for its employees. The implementation and monitoring of the standards of the workforce housing is included in the WFHS (see ??? for the details of the WFHS). With regard to transport, the Industrial Relations Management Plan requires that the Contractor transport their personnel to and from the work site to accommodation areas or designated pick up points. All Project vehicles including vehicles/busses used for the transportation of project personnel are subject to a Pre Mobilisation Inspection by a Project approved Competent Person. The Project HSE and IR teams periodically audit the contractors for compliance with the project HSE and IR standards which include compliance with the Accommodation and Meals Standard and vehicle pre mobilisation.	<b>COMPLETED</b> The IESC considers that the Meals and Accommodations Standards are adequate. During the site visit it appeared that accommodation standards and minimum safety requirements of personnel transportation may not be complied with by all contractors. To address this GAC shall conduct an audit of contractors' workers' accommodations and transportation services. This will be reviewed during the next IESC monitoring visit.  GAC Workforce Housing Strategy (WFHS) provided is yet to be completed. A workers' accommodations strategy should be finalized compliant with Lender's requirements. During monitoring visits, the adequacy of workers accommodations will be reviewed.

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L0003/17	12	D2.1.3A	Grievance mechanism processes are currently outlined in different documents and procedures.	GAC will consolidate the different measures contemplated for managing and addressing worker grievances in a single and coherent procedure that is understandable to the workforce, ensures anonymity, and provides access to all workers, including third-party workers.	Before Financial Close	Consolidated grievance mechanism	Employees Grievance Mechanism Protocol.doc	Completed	<p><b>COMPLETED</b></p> <p>GAC has an adequate grievance mechanism for workers through the Internal Regulations. Minor improvements are recommended to the employees' grievance mechanism protocol.</p> <p>During monitoring visits, the implementation and effectiveness of the mechanism will be reviewed, including its dissemination among direct and contractor workers and their understanding of the mechanism.</p>
<b>PS3 Resource Efficiency and Pollution Prevention</b>									
R0001/17	13	D3.1.1 3.1.2 6.1.2B	<p><i>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. New data is now available which influences the assumptions and conclusions of the IWMP and a revision is required.</i></p> <p><i>The IWMP for the reservoir area needs to better define requirements to ensure protection and conservation of downstream biodiversity</i></p>	<p><i>GAC to evaluate all opportunities to minimise water use, and reduce environmental (including dust suppression) and social impacts.</i></p> <p><i>As part of this GAC to update the IWMP for the project to include:</i></p> <ul style="list-style-type: none"> <li><i>– The results of the groundwater testing and whether supplementing the water supply from groundwater is a feasible option.</i></li> <li><i>– Add detail on the decision process GAC is to follow to trigger the move from river to dam water supply.</i></li> <li><i>– 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.</i></li> </ul>	Before Operations	Updated IWMP Plan			<p>The dam is now nearing completion and will be filled in the 2018 wet season, but will not need to be fully used until the start of operations in 2019. As a consequence, GAC has time to review the assumptions in the IWMP, and gather further baseline information on water flows and levels in the local rivers through the dry and wet seasons.</p> <p>GAC is to have the revised IWMP prepared before the start of operations and this should be completed before the start of the 2019 wet season so that the management controls identified in the IWMP can be implemented in time for that season.</p>

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				– 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.					
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			GAC has commissioned TPI to undertake its surface and groundwater monitoring and the initial reports are considered to provide GAC with a good baseline (although surface water testing has not yet commenced). Once the laboratory is operational (mid-2018) and the monitoring regime is fully established and gathering temporal data GAC should use this to feed into the IWMP.
R0003/17	15	D3.1.1 3.1.2	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.	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).	Within one year of operations starting	Updated Project Water Model and Water Monitoring and Management Plans			See ESAP item 14. The approach to the use of monitoring data in the IWMP will be assessed during the IESC's next visit in December 2018.
R0004/17	16	D3.1.3	The Project will consume a substantial volume of diesel for power generation, mobile plant and train transport, and therefore has a significant carbon footprint. In addition, the lack of low sulphur diesel in-country will likely result in SO <sub>2</sub> emissions and therefore greater impacts on air quality than in countries where low sulphur fuel is available. It is understood that some contracts such as the mining contract have set fuel use per bank cubic metre, which provides some encouragement for the contractor to save fuel and increase its revenue.	GAC to establish clear KPIs around fuel use in order to enable a business focus on fuel use and efficiency such that GAC and contractors focus on maximising equipment efficient and/or operational practices, and identify where improvements can be made.	Before Financial Close	List of fuel use KPIs tracked by area (port platform, mine etc.)	GAC Storage Fuel Risk Assessment_20171219.xlsx GAC General Fuel Storage & Loading and Unloading Requirements 20171219.docx Fuel use KPIs List_20171222.xlsx	Completed	<b>COMPLETED</b> Documentation provided is considered to address the required action and the fuel usage KPI is acceptable. It is noted that the KPIs as currently designed are very detailed and it is anticipated that these will be rolled out and adapted through the construction phase and into the operational phase as they become applicable. This will be reviewed through the IESC monitoring visits.



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R0005/17	17	D3.2.2	<i>Air model impacts were assessed in SEIA Addendum based on generic assumptions regarding equipment and operations. This may not be reflective of the impacts 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.</i>	<i>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 Addendum (set at medium) is correct, and provide justification for the assumptions on expected emission reductions used in the mitigation scenarios.</i>	<i>Prior to start of Operations</i>	<i>Air modelling report update/ addendum, and air quality monitoring and management plan</i>			<p>GAC's consultant TPI has commenced the baseline air monitoring, and the IESC expects that this will provide data which can be used to calibrate a revised air model. GAC is also starting to collect emission information on the equipment now this is starting to be defined. It is understood that no contract has been awarded yet for the re-running of the air model.</p> <p>The IESC considers that this action point is progressing in a timely manner.</p>
R0006/17	18	D3.2.4	<i>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).</i>	<i>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.</i>	<i>Prior to start of Operations</i>	<i>Detailed fuel handling procedure(s)</i>			<p>The fuel off-loading infrastructure has yet to be built and the IESC will follow up on this during the December 2018 visit to understand progress, roles and responsibilities (sea and land-side) and fuel handling procedures.</p>



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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>			<p>The IESC discussed this in detail with GAC during the May 18 certification visit. GAC has proposed that the borrow pit approval process including the restoration, is included in the land disturbance process so as to have these unified in their approach. The IESC concurs that this is a pragmatic and sensible solution.</p> <p>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. IESC are advised a Pre-Clearance Biodiversity Survey (PCBS) was undertaken of the borrow pits - we have been provided with PCBS survey reports for Plateau 20 &amp; 26 (and quarries) which are in French and being translated.</p> <p>The IESC will assess the effectiveness of this system and compliance with the restoration requirements during the December 18 monitoring visit.</p>
R0008/17	20	D3.2.6	<i>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.</i>	<i>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.</i>	<i>Prior to the start of operations</i>	<i>Quarry Management Plan</i>			<p>The IESC visited the active hard rock quarry and noted that the operational area had only expanded to a limited extent since the 2017 visit. The IESC was informed that these works were covered by the ABEMS process, although no evidence was provided.</p> <p>It is envisaged that this quarry will remain operational into the project operational phase, and the IESC will review the management controls as part of the monitoring visit in December 2018, and assess the appropriateness of any environmental monitoring around the quarry (noise, water, dust etc.).</p>

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R0009/17	21	D3.2.8	While the Project commits to following industry good practice with respect to waste avoidance, minimization, recycling (metals, plastics, oils, solvents, etc.) and disposal; the mismanagement by third party recycling/waste companies can result in environmental degradation and/or human health impacts.	GAC will undertake audits of the waste disposal and recycling firms it utilizes (e.g. for scrap metal, plastics, waste oils, waste solvents), to ensure that these wastes are appropriately recycled and do not create an environmental or human health risk.	<i>Prior to Financial Close</i>	Waste disposal and recycling audit report(s)	9000-S-CPD-00061 Rev 2 Waste Management Procedure.docx GAC Environmental Risk Assessment Criteria for 3rd Party Waste Operators 20171219.xlsx  GAC ERA Criteria_3rd Party Waste Operators_Nitrokemine_20171220.pdf Nitrokemine Authorization.pdf	Completed <i>Audit carried on Nitrokemine for recycling of oil (Nitrokemine)</i>	<b>COMPLETED</b>  GAC has undertaken audits of the one waste contractor used (Nitrokemine) for recycling its waste oils. The intention is to identify further recycling routes and audit the contractors involved.  The waste management at GAC will be a focus for the December 2018 monitoring visit, at which time the new waste facility will be constructed, and hopefully a waste/resource manager appointed.
R0010/17	22	D3.2.9	<i>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.</i>	<i>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.</i>	<i>Prior to landfill construction</i>	<i>Report detailing the planned landfill design.</i>			IESC understands that GAC's aim is not to have a landfill on the project, but to seek to recycle or incinerate all wastes. Progress on this will be assessed on the IESC's December 2018 monitoring visit.
R0011/17	23	D3.2.10	<i>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.</i>	<i>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.</i>	<i>Prior to landfill construction</i>	<i>Landfill management plan and procedures</i>			See comment above on ESAP item 22
R0012/17	24	D3.2.12	<i>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 should be disposed in a beneficial manner.</i>	<i>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.</i>	<i>Before start of Operations</i>	<i>Incorporation of bio-solids in the WMP or appropriate procedure</i>			GAC has attempted and so far failed to recover the bio-solids from the WWTP as they were too solid to dislodge. The future recovery of this is planned and the treatment of these bio-solids and also other organic wastes through composting is still being evaluated.  IESC will focus on this as part of the review of waste management in December 2018 monitoring visit.
R0013/17	25	D3.2.13	The landfill on site will be for non-hazardous wastes generated at the mine site	GAC will detail the approach to hazardous waste management, and provide commitments to their regular disposal to a suitably licensed waste management company,	<i>Before Financial Close</i>	WMP to incorporate specific hazardous	9000-S-CPD-00061 Rev 2 Waste Management Procedure_Draft_20171218.docx	Completed <i>GAC will establish a Waste Management Facility that will be</i>	<b>COMPLETED</b>  GAC reported during the May 18 IESC visit that they are aiming to avoid the use of a landfill, and are

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			<p>which cannot be recycled or incinerated.</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>or an audited equivalent, or a facility managed to these standards by GAC.</p>		waste management procedure	9000-S-CPD-00025 Rev 3 Hazardous Substances and Dangerous Goods.docx	<p><i>operated on the principles of waste recycling and re-use; decontamination and incineration, and where required, temporary and permanent safe storage of hazardous waste.</i></p>	<p>also in the process of building a new waste management facility near the current truck maintenance area.</p> <p>Waste management observed during the May 18 IESC visit was passable, but required more ownership and focus on implementing the details of the waste management plan. GAC reported that efforts are underway to recruit a waste/resource efficiency manager who will have responsibility for waste.</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>	<p><i>GAC to develop the Mine Closure and Rehabilitation Plan in order to address mining areas restoration activities and include funding mechanism.</i></p>	<p><i>Before start of Operations</i></p>	<p><i>Mine Closure and Rehabilitation Plan</i></p>	<p><i>20180207 V40 Mine Closure Rehab Plan MGN Clean 13 Feb 2018.docx (DRAFT)</i></p>		<p>The IESC considers that GAC has made acceptable progress on this ESAP item, but requires further action before the start of operations. A <i>draft</i> mine rehabilitation and closure plan has been prepared which includes commitments to progressive rehabilitation, community consultation and land use planning. It does not currently include details on a funding mechanism. Finalisation of the draft plan and its early implementation will be reviewed through future IESC monitoring visits.</p> <p>As observed during the site visit, GAC is working with a local nursery to secure sufficient indigenous seed and generate seedlings for use in site restoration. They plan to use the nursery to nurture further community nurseries across the concession as the mine plan is implemented.</p> <p>The restoration of mine plateaus is currently being considered as part of the overall restoration planning for the road cuttings, dam, borrow pits etc. and include use of indigenous and crop species.</p>
<b>PS4 Community Health Safety and Security</b>									
C0001/17	27	<p>D4.1.1</p> <p>4.1.7</p> <p>4.1.9</p>	<p>Community Health and Safety Plan requires linkages/references to all related management plans and procedures.</p>	<p>GAC will revise the Community Health and Safety Management Plan to incorporate links to all related management plans and procedures, including the Influx Management Plan, Security Management Plan, SEP and EPRP.</p>	<p><i>Before Financial Close</i></p>	<p>Finalised Community Health and Safety Plan</p>	<p>GAC Community Health and Safety Management Plan 20171221.docx</p>	<p>Completed</p>	<p><b>COMPLETED subject to approval by GAC management</b></p> <p>The document is considered to be adequate. However, it is presented as draft version and needs to be finalized and approved by management. Implementation will be reviewed during monitoring visits.</p>

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C0002/17	28	D4.1.1	The Project Induced In-Migration Strategy is adequate but relies significantly in cooperation with government and other stakeholders and will take time to implement. GAC is in the process of developing an Influx Management Plan with actions under its control and that can start to be implemented in the short term.	GAC to finalise the Influx Management Plan with actions under GAC control and that can start to be implemented in the short term. The Influx Management Plan will take into consideration an in-depth study of available labour and skills in local communities as well as accommodation availability.	Before Financial Close	Finalised Influx Management Plan	• PIIMMS Operationalization 20171010a.pdf	Completed	<b>COMPLETED</b> Document includes a detailed Influx Management Plan with links to GAC strategies and social and environmental management plans.  As confirmed during the April site visit, an Influx Management Coordinator has been hired and is starting the implementation of the plan. A presentation during the site visit showed progress, starting with engagement with local government and authorities for coordination with local development plans.
C0003/17	29	D4.1.2	The project risks register includes general community risks. Development of a risk register to include the specific risks that affect the communities would provide a more comprehensive basis to ensure risks are being adequately managed.	GAC will prepare an integrated community risk register, that addresses the components of the project, including public exposure to physical trauma, burns and smoke inhalation, respiratory distress from dust, and exposure to hazardous materials and other risks to health and safety. This should include consideration of, and cross-reference to, the revised EPRP and Community H&S Plan.	Before Financial Close	Integrated community risk register	Community risks December.pdf	Completed <i>Community Risks have been identified and integrated into the GAC Risk Register. The document "Community Risk Register" provided includes the Gac Risk Register as well as a work plan to complete and fully address identified risks.</i>	<b>COMPLETED</b> GAC has completed a Community Risk Register identifying public exposure to physical trauma, burns and smoke inhalation, respiratory distress from dust and exposure to hazardous materials as well as other risks to health, safety and human rights. The risks register includes a work plan to address identified risks and is considered in the process to develop EPRP through the Crisis Management Framework.
C0004/17	30	D4.2.1 4.2.2 4.2.3 4.2.4  4.1.1	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.	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 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	Before Financial Close	Security Management Plan	GAC - Security management plan.pdf	Completed	<b>COMPLETED</b> The IESC considers the document to be adequate, however it has minor mistakes and improvements are suggested.  During the visit in April it was confirmed that the military attaché designated by the Ministry of National Defence continues to liaise with GAC according to the MoU in place. In addition, GAC is in the process of developing a MoU with government security forces to detail how public forces are to be engaged, as necessary. This will be followed up during IESC monitoring visits.
<b>P55 Land Acquisition and Involuntary Resettlement</b>									
A0001/17	31	D5.1.7	<i>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.</i>	<i>GAC to complete the implementation of the audit action plan, and provide evidence of completion of the 2008 RAP.</i>	<i>Before start of Operations</i>	<i>Completion audit of the action plan</i>			<i>During April's site visit, the IESC followed up on the implementation of the RAPs for the Kamsar and concession areas. The process is advanced, and progress noted. Additional RAPs are being developed following GAC's Land Acquisition and Resettlement framework and implementation will be reviewed during monitoring visits.  GAC should provide a report on the implementation of the audit of the implementation of the Action Plan for Kamsar 2008 RAP prior to start of operations. Some grievances reported are related to the 2004 resettlement process.</i>

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<b>PS6 Biodiversity Conservation and Sustainable Natural Resource Management</b>									
B0001/17	32	D6.1.1A	<i>Biodiversity management requirements and monitoring/indicators should be fully aligned across documents to ensure consistency.</i>	<i>GAC to complete fine-tune alignment of all biodiversity mitigation measures, monitoring and indicators (as appropriate) in future iterations of BMEP and EcoS documents.</i>	<i>Before start of Operations</i>	<i>Updated versions to be provided as completed.</i>			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	<i>GAC have provided written clarification that they do not intend to develop fisheries in the reservoir, but will not prevent communities fishing as they do now.</i>  <i>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'</i>	<i>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).</i>  <i>GAC to update BMEP to include appropriate management approach(s) to community fishing to avoid any over-exploitation of the fishery resources.</i>  <i>GAC to expand BMEP freshwater fish monitoring to the reservoir (ensure ecosystem health &amp; diversity maintained, and commercial species not introduced), and be cognisant of community health &amp; safety at GAC infrastructure.</i>	<i>Before start of Operations</i>	<i>Revised BMEP</i>		<i>Currently, GAC have verbally committed to their intention of not stocking the reservoir for the foreseeable future. If this situation were to change, they've verbally committed that external freshwater fish expertise would be sought prior to any decisions being made.</i>  <i>The BMP and BMEP have not been revised since the ESDD so language is still inconsistent.</i>  <i>The Scope of Work for freshwater fish (and herpetology) monitoring is currently being developed, which will contribute baseline information and current status across both the concession (north and south) and at the port site.</i>  <i>GAC should ensure community expectations are not being unduly raised to the extent that they may expect a stocked reservoir to be made available.</i>	
B0003/17	34	D6.2.1A	<i>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. 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.</i>	<i>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.</i>  <i>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).</i>	<i>By start of Operations</i>	<i>Revised appropriate mine/drilling management plans detailing PCBS review</i>  <i>Develop a remote sensing program.</i>		<i>The land disturbance permit process as presented in the approved BMP (Appendix 4) has been adapted into part of a wider Activity Based Environmental Method Statement (ABEMS) process (detailed in ESAP ID- 19 above). We were informed that an assessment of whether a PCBS is necessary, and its subsequent undertaking when required, is a mandatory pre-requisite input into GAC's ABEMS process. An example Biodiversity Checklist and associated ABEMS for one land disturbance event has been provided to the IESC to demonstrate the process. Whether this allows for sufficient time/opportunity for PCBS findings to inform any necessary avoidance decision-making will be reviewed in future visits.</i>  <i>During the site visit, the IESC reiterated the value and importance of obtaining and analysing satellite imagery to establish land use/habitat condition at</i>	



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				<i>GAC to retain information on justifications wherever Environmental Buffer Zones are breached</i>					this early stage of mine development. The Environmental Buffer Zones (EBZ) are now part of the Mine Plan GIS. A systematic process to capture decision-making in those instances where encroachment into an EBZ might be justified was discussed. Retention of appropriate wildlife corridors will need to be factored into road layout and infrastructure design.
B0004/17	35	D6.2.4A	Construction contracts incorporate requirement to meet BMP measures into construction contracts, but there is no evidence that contractors have applied them.	GAC to audit the contractor operations to demonstrate that contractors are complying with the appropriate BMP measures at the mine and port sites.  GAC to map ESMP & BMP mitigation measures between GAC & EPC plans, to avoid gaps.	<i>Before Financial Close</i>	GAC audit report including gap assessment.	ERM GAC ESAP BMP Audit report - V3 FINAL REPORT EN 20171219.pdf  Contractors SHE audit programme 20171221	Completed	<b>COMPLETED - for follow up during Construction and Operations.</b>  GAC contracted ERM to undertake the audit and gap analysis of contractor practice regarding biodiversity management. ERM undertook a mapping exercise to link each BMP relevance to construction contractors. A joint EGA/Fluor Biodiversity Management Procedure has been developed, applicable to all contractors and sub-contractors; it does not reflect BMP mitigation detail but includes general good practice mitigation and control measures. GAC are engaging with main contractors on implementation of the priority items as per ESAP ID-36 below.  In addition, GAC have developed a procedure to undertake SHE audits of their contractors; this includes biodiversity protection measures within audit scope and as a key SHE issue to be managed.

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B0005/17	36	D6.2.4B	A number of BMP mitigation measures and commitments have not been implemented by GAC, including some specifically designed for implementation prior to and/or during the construction phase.	GAC needs to implement priority BMP mitigation measures immediately to minimize the likelihood of construction impacts arising or ongoing.	Before Financial Close	Evidence of implementation of priority BMP.	<p>Activities related to the implementation of the Biodiversity Management Plan.doc</p> <p>ERM GAC ESAP BMP Audit report - V3 FINAL REPORT EN 20171219.pdf</p> <p>Contractors SHE audit programme 20171221</p> <p>BMP Implementation Strategy (updated 14 May 2018)</p>	Completed	<p><b>COMPLETED - for follow up during Construction and Operations.</b></p> <p>The IESC considers that since Oct 2017, GAC have more adequately addressed the implementation of early BMP priority measures. Key to progress has been the Biodiversity Specialist being in position, along with the dedicated support of an additional staff member in the Biodiversity team - see ESAP ID-2.</p> <p>GAC have prioritised BMP mitigation measures and early monitoring measures, and assessed for implementation feasibility, to allow them to better focus available resources on the most pressing issues.</p> <p>GAC contracted ERM to undertake an audit and gap analysis report (dated Dec 2017) - refer also to ESAP ID-35. ERM's summary opinion at that time was that implementation of priority actions was still at a very early stage, although progress was being made. They stated generic measures in the SEMP had received more attention than priority feature measures detailed in the BMP.</p> <p>GAC have recently produced a BMP implementation Strategy document. During our brief visit to site, we observed and discussed implementation of several key priority actions. Although work is still required to catch-up, we are encouraged by GAC's current approach and generally concur with the prioritisation made. We therefore concur that this ESAP item is completed, and ongoing BMP implementation will form a key part of future IESC visits.</p>
B0006/17	37	D6.2.4B	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)	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)	Before the start of Operations	Revised Mine Plan			<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		A BMEP has been developed. This provides the framework for monitoring priority species at both the mine and port 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.	<p>Develop work plan for first year of BMEP implementation.</p> <p>GAC to review the BMEP suite of indicators to ensure efforts are focussed on obtaining the most relevant data across priority species/habitats.</p>	By start of Operations	1 <sup>st</sup> year workplan Revised BMEP			<p>Workplan developed. Evaluation of this workplan against Lender requirements 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.</p>



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B0008/17	39	D6.2.5	GAC will undertake a biodiversity offset program for the purposes of achieving net gain for Critical Habitat at the mine site. The Biodiversity Consultancy (TBC) has produced an Offset Feasibility Report and GAC Offset Overview documents, setting the framework for GAC's biodiversity offset program.	GAC to confirm final decision to move ahead with Moyen-Bafing, and gain lender agreement.  Commitment to initiate set-up phase of Feasibility Road-Map.  GAC to initiate regular progress updates for Lenders/IESC (e.g. monthly) on steps towards Moyen-Bafing offset design and implementation.	Before Financial Close	Formal letter of commitment  Initial status update		Following the February Meeting in Paris, there were discussions to incorporate the Offset into the Common Terms of Agreement; therefore there is no more need for a Letter of Intent	COMPLETED pending Lender confirmation of appropriate commitment in Common Terms Agreement (The IESC has not seen this document, or been involved in workshops/teleconference update calls to date).
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.	GAC to provide details of on-site set-aside once forthcoming chimpanzee surveys by EEM are completed.  Once initial design of the long-term chimpanzee monitoring program is completed, integrate this into the Project's BMEP (in accordance with the BMP).	Before start of Operations	Chimpanzee survey analysis and on-site set-aside delivery plan.			Chimpanzee survey results were not ready in time for the May site visit. GAC reiterated that survey results will help inform the most appropriate location for an onsite set-aside, and how this can best provide in-situ protection (especially for restricted range species) as per commitments made previously.  Our site visit included a visit to the Boulléré Key Biodiversity Area (KBA), the potential set-aside area in the north-east of GAC's concession, discussed in detail in the Offset Pre-Feasibility document (Mar 2017).
B0010/17	41	D6.2.6	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  The scope of works for the offset includes the requirement for an independent critical assessment review of the offset to assess its effectiveness.	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.  Undertake the planned independent critical assessment review of the first 2 years of offset, to assess progress against objectives and requirements.	By start of Operations	Monitoring and Evaluation Plan  Critical assessment review	Rapport d'achèvement projet mangrove Kamsar VF.pdf		The Taïdy restoration site was visited during the IESC site visit. However, there was no evidence of mangrove growth resulting from restoration efforts undertaken prior to 3Q 2017. GAC are investigating with GPS-SRL. Areas of mangrove restored during the Sept 2017 campaign were observed. There is no monitoring and evaluation process established yet. The planned independent critical assessment review has not yet been scheduled. GAC's approach to how best to deliver a suitable mangrove offset was discussed in some detail during our visit - see Section 3.3.

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				<i>Following construction, GAC to provide an updated assessment of loss (mangrove footprint) for offset purposes</i>		<i>Updated Conservation Loss Footprint</i>			
B0011/17	42		The contract with the mangrove offset program organisation (GPS-SARL) lapsed in June 2017.	GAC to reinstate the contract with GPS-SARL with priority, prior to end of optimal planting season (October).	<i>Before Financial Close</i>	Confirmation of renewal of GPS-SARL contract.	Rapport d'achèvement projet mangrove Kamsar VF.pdf Chronogram of Sep/Oct Activities	Completed	<b>COMPLETED pending provision of evidence of contract renewal.</b>  An area of early-growth mangrove was observed at Taïdy which we were told was from the Sept/Oct 2017 planting (as per the ESAP required action). See ESAP ID-41.
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>			IESC are not aware of progress on this action. See ESAP ID-45.
B0013/17	44	D6.3.1	<i>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.</i>	<i>GAC to review the level of residual significance allocated to assessed priority EcoS impacts</i>	<i>By start of Operations</i>	<i>Revised EcoS Assessment</i>			IESC are not aware of progress on this action. See ESAP ID-45.
B0014/17	45	D6.3.1	<i>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.</i>	<i>GAC to include EcoS as an issue requiring multi-function oversight within the new Integrated Business Planning (IBP) team.</i>  <i>This will include ensuring organisational role linkages between Biodiversity team and Communities team, and that teams discuss priority EcoS management/monitoring regularly.</i>	<i>By start of Operations</i>	<i>IBP EcoS Oversight Plan</i>			This was discussed during the IESC site visit. GAC's intended program of Community Natural Resource Management looks to be a sound, positive approach, although to work successfully will require a more integrated, collaborative working relationship between the Environment and Community Teams. We further recommend establishing an effective Ecosystem Working Group (as per the approved BMP) and Senior Management backing of the process.

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B0015/17	46	D6.5	Suppliers are required to follow GAC's Code of Conduct. This does not provide any requirements on the avoidance of supply chain impacts for food, timber, etc.	GAC to update its supplier Code of Conduct to specify avoidance of supply chain impacts for food, timber, etc. and bring it into compliance with IFC PS6, para.30.	Before Financial Close	Revised Code of Conduct for Suppliers	Updated Supplier Declaration 2018 - French.pdf Updated Suppliers Declaration - English.pdf	Completed	<b>COMPLETED</b> Updated declaration states 'work to minimise ... significant adverse impact on natural or critical habitats.' Aspects of what the supplier might need to manage could have been stated more strongly, but the revision is noted. Future monitoring visits will follow up on whether any supply chain analysis has been undertaken, and whether any review/verification has been incorporated into the ESMS.
<b>PS8 Cultural Heritage</b>									
H0001/17	47	D8.1.1	<i>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. 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.</i>	<i>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.</i>	<i>Before the start of Operations</i>	<i>Cultural Heritage Management Plan</i>			A working draft of the cultural heritage management plan has been provided (not dated, reviewed, or provided with a unique reference number). This should also reference mining buffer zones where they are relevant to cultural heritage.  This will be reviewed during the IESC monitoring visit in December 18.
H0002/17	48	D8.1.2	GAC has a chance finds procedure, and has a Cultural Heritage Resource Management training module (GAC-HSSE-T-031). However, cultural heritage takes several forms (physical and contextual) and it will require specific awareness training of personnel/contractors undertaking earthmoving activities.	GAC to instigate specific training of the operatives with the potential to encounter cultural heritage in the key aspects of recognising cultural heritage material.	Before Financial Close	Details of training course contents and roll-out programme	GAC Cultural Heritage Management Plan.docx Annexe A - GAC Cultural Heritage Chance Find Procedure ERM review 20171219 AP  Annexe B - GAC Cultural Heritage Training Module compress ERM review 20180104	Completed	<b>COMPLETED</b> Some minor improvements are recommended to the documents and monitoring approach.