



Dougoufissa creek crossing May 2022

# Guinea Alumina Corporation Conakry, Republic of Guinea

## GAC PROJECT

### IESC Monitoring Report: Eighth Monitoring – Site Visit May 2022

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## ABBREVIATIONS AND ACRONYMS

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

<b>HSE</b>	Health, Safety and Environment
<b>IBGRN</b>	Grassroots Initiative for Natural Resource Management (Initiative de Base pour la Gestion des Ressources Naturelles)
<b>IESC</b>	Independent Environmental and Social Consultant
<b>IFC</b>	International Finance Corporation
<b>IUCN</b>	International Union for Conservation of Nature
<b>IUCN/SSC PSG SGA SSA ARRC</b>	IUCN Species Survival Commission, Primate Specialist Group, Sections on Great Apes and Small Apes, Avoid-Reduce-Restore-Conservation Task Force
<b>IWMP</b>	Integrated water management plan
<b>KBA</b>	Key Biodiversity Area
<b>KPI</b>	Key Performance Indicators
<b>LACRF</b>	Land Acquisition, Compensation and Resettlement Framework
<b>LTI</b>	Lost Time Injuries
<b>LTIFR</b>	Lost Time Incident Frequency Rate
<b>MBNP</b>	Moyen Bafing National Park
<b>MBZ</b>	Mohamed bin Zayed (Species Conservation Fund)
<b>MBOP</b>	Moyen Bafing Offset Program
<b>MIGA</b>	Multilateral Investment Guarantee Agency
<b>MoU</b>	Memorandum of understanding
<b>NGO</b>	Non-Governmental Organisation
<b>NG</b>	Net Gain
<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>PDS</b>	Pre-Disturbance Surveys
<b>PFS</b>	Pre-Feasibility Study
<b>PIIM</b>	Project Induced In-Migration
<b>PS</b>	Performance Standard
<b>RAP</b>	Resettlement Action Plan
<b>RO</b>	Reverse Osmosis
<b>SCM</b>	Species-specific Control Measures (in BMP)
<b>SEIA</b>	Social and Environmental Impact Assessment
<b>SEP</b>	Stakeholder Engagement Plan
<b>SHE</b>	Safety, Health, Environment
<b>SHEC</b>	Safety, Health, Environment, and Community
<b>SMP</b>	Security Management Plan
<b>SMS</b>	Social Management System
<b>SNAPE</b>	National Water Service (Service National des Points d'Eau de Guinée)
<b>SOP</b>	Standard Operating Procedures
<b>SPV</b>	Special purpose vehicle
<b>SRA</b>	Security Risk assessment
<b>SSC</b>	Species Survival Commission
<b>STP</b>	Sewage Treatment Plant
<b>SYDEV</b>	Synergies and Development (an NGO)
<b>TBC</b>	The Biodiversity Consultancy
<b>ToR</b>	Terms of Reference

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

## EXECUTIVE SUMMARY

RINA Consulting S.p.A. (formally D'Appolonia), has been appointed to act as the Lenders' Independent Environmental and Social Consultant (IESC) to monitor the construction and operational phase of the Guinea Alumina Corporation (GAC) Project. The IESC scope is to assess compliance with the Environmental and Social Management Plan (ESAP) and the Environmental & Social Requirements of the Project during the life of the loan agreement and Multilateral Investment Guarantee Agency (MIGA) guarantee of the GAC 'Project'. Specifically, the IESC is tasked with undertaking Environmental, Social, Health & Safety (ESHS) monitoring throughout the construction and operation phases of the Project, to verify whether Project plans and procedures and Lenders' environmental and social requirements (including International Finance Corporation (IFC)) Performance Standards; applicable IFC Environmental, Health and Safety (EHS) Guidelines, African Development Bank (AfDB) safeguards policy), are properly implemented at field level during the ongoing activities

The Project includes the mining of bauxite within GAC's concession in the Boké province of Guinea, the operation of a port terminal with an offshore export berthing facility at Kamsar, and railway spurs connecting the bauxite mine and the port terminal to the existing railway system. The Project entered the start of Operations on the 30<sup>th</sup> July 2019, and is now fully operational.

This report presents the IESC's findings of the Project status at the time of review of the eighth monitoring event post financial close. This was the first in person visit since October 2019, with the intervening six-monthly monitoring events being done virtually due to Covid-19. It is anticipated that the next 2022 review will also be in-person and is provisionally scheduled for later in Q4 2022. This audit was conducted through a series of in person interviews (with some GAC team and lenders joining selected meeting using Microsoft Teams), combined with a series of discipline specific field visits. The site visit was undertaken between the 16<sup>th</sup> and 19<sup>th</sup> May 2022, with a wrap-up session on Friday 20<sup>th</sup> May 2022, before the lenders and IESC departed for Conakry<sup>1</sup>. No data was provided in advance of the site visit, however additional information was requested after the site visit, with the documentation cut-off date the 9<sup>th</sup> June 2022, to provide the IESC more clarity or verify several discussion items.

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

Following this review, it is the IESC opinion that GAC has now closed out 45 of the 48 ESAP items noted during the 2017 Due Diligence process. There are three remaining ESAP items where the IESC has concerns about the delays in issue resolution – these are presented in Annex A to this report and detailed further in relevant report sections.

### SHEC<sup>2</sup> Management

The management structure for of the Safety, Health, Environmental, and Community Relations teams was in the process of being further refined at the time of the audit, and the planned organisational structure for the environment team was shared with some members of the IESC for discussion. These changes are considered to be good. At the upper level there are separate reports for Health, and Environment and communities to the CEO, H&S and Security report to the COO along with the directors for the mine and the port operations. Since the last audit the COO has been promoted to CEO, and the Director of Port and Rail promoted to COO, both these individuals have a long history with the project and have specific SHEC responsibilities.

Within the environment team discrepancies in the hierarchy of the team and the reports to the manager are planned to be addressed, and the proposed new structure, if implemented as planned, should improve the management of environment. Overall, the number of reports to the manager have been reduced and are all now from solely senior team members (whereas before it included junior staff). The changes to reporting structures are not discussed further here as they have not yet been communicated to the team.

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<sup>1</sup> Note, for the two weeks preceding the IESC/Lender site visit, RINA's Biodiversity and Community Specialists visited the Moya National Park (GAC's biodiversity offset site), the findings from which will be reported on separately.

<sup>2</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).

Safety is run by the HSE Manager who reports to the COO. The Chief Medical Officer (who reports to the CEO as is required by EGA) oversees medical staff and offices (including ambulances) at the Mine and the Platform/Port. The Environmental and Community Director reports to the CEO.

The communities team is now placed under the manager who covers both Environment and Communities. This change should strengthen the interfaces and cooperation between the teams, although the detailed structure in the communities team is yet still evolving to better address community relations and social risks. Under the current structure, community relations are led by the Community Relations Manager who reports to the Environment and Community Director. The Community Relations Manager is supported by six superintendents in charge of i) Influx Management, Compliance and Livelihood Restoration, ii) Communications and Special Needs, iii) Community Relations and Conflict Management, iv) Compensation, v) Grievance Management, and vi) Resettlement and Post Resettlement. Over the review period 13 community Relays were reinstated to support stakeholder engagement. GAC is considering adding three to four new positions within the next six months to strengthen livelihood restoration, community relations in the Kamsar area, cultural heritage, land acquisition and compensation. The Community Investment function that previously was under the responsibility of the General Manager, has been transferred to the Communications and Corporate Social Responsibility Director.

The Environmental Management System (EMS) and SMS procedures were completed and uploaded/integrated to EGA's SharePoint DMS. With the roll-out of the Operational Environmental and Social Management System (OESMS), there is a need to revise the EMS and SMS (to match the OESMS structure), move away from having a management system on the EGA server, and hold these documents locally, which enables GAC to be able to better manage and update them as required. This work is starting, and is expected to be complete by Q4, 2022. An updated suite of all OESMS Plans and Procedures was requested but not available at the time of writing.

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

### Environment

As discussed above the environment team structure is being refined but it retains the core disciplines of monitoring and compliance, waste and resource management, biodiversity and rehabilitation (covered separately below) and land use and erosion control.

The Project continued to track the key resources being used of fuel and water. Monthly Scope 1 GHG emissions January to May 2022 averaged at 5,828t CO<sub>2eq</sub>/month (compared to the average for 2021 of 5,393 t CO<sub>2eq</sub> and total in 2021 of 64,710 t CO<sub>2eq</sub>).

The monthly energy, greenhouse gas (GHG), and water intensities of exported bauxite are presented on the environmental score card to senior management. These KPIs for Q1 2022 showed a fall in energy (GJ/Mt) and therefore GHG (kg CO<sub>2eq</sub>/Mt) intensity over the quarter. Energy intensity decreased from 0.09 to 0.06 GJ/Mt compared to an industry benchmark of 0.1 GJ/Mt, and GHG intensity had a corresponding decrease from 6.18 to 4.60 kg CO<sub>2eq</sub>/Mt compared to an industry benchmark of 4.90 kg CO<sub>2eq</sub>/Mt. While the average for the quarter is above the industry benchmark, GAC is anticipating the use of the longer trains will reduce the energy intensity and there is a Mott McDonald study underway on reducing/optimising fuel use including the use of LNG, however there is insufficient scale for LNG to be an option at this stage.

The period since the eighth IESC remote audit has been largely covered by the dry season and water use has averaged at 30,789 m<sup>3</sup>/month for the first five months of 2022 (compared to the equivalent period in 2021 which averaged at 40,654 m<sup>3</sup>/month). The water intensity over the first five months of 2021 was 0.034 m<sup>3</sup>/Mt of ore exported which is significantly lower than the industry average of 0.404 m<sup>3</sup>/Mt<sup>3</sup>. It is noted to be higher than the average for equivalent five months of 2021 of approximately 0.029 m<sup>3</sup>/Mt. GAC now has water meters in place which are enable it to start to assess the water use data in greater depth and assess where the main water demands are and therefore develop area specific KPIs, enable local area accountability for water use, and encourage water efficiency drives.

GAC also tracks land use intensity of exported bauxite (m<sup>2</sup>/Mt) and over the quarter these varied between 0.06 m<sup>2</sup>/Mt (March) to 0.24 m<sup>2</sup>/Mt (April) with the average above the Bauxite Industry average of approximately

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<sup>3</sup> See above reference #4



0.8 m<sup>2</sup>/Mt. The use of an industry average is useful, although it will be very dependent on the nature and thickness of the deposit being mined.

The waste management area on the Kamsar Platform is now operational and has an incinerator. The incinerator at the Tinguilinta waste management area was broken at the time of the audit and GAC was using barrel burners for cardboard and paper waste. Whilst the incinerator is currently out of action, GAC's challenge has been the fact the rate of recycling and incineration has not been equal to the volume of waste arriving and this has led to an accumulation of waste. To address this GAC is now planning to install a landfill adjacent to the waste management area. Since the last audit GAC has audited the NGOs to take its plastic waste conveyor belts for recycling/reuse. These audits did not identify any issues of compliance.

Over the reporting period the compliance of the Kamsar sewage treatment plants (STP) has been good, however there have been further non-compliances with e-coli in the discharge from the Tinguilinta STP. This is due to an issue with the chlorine dosing and potentially the sampling port. GAC needs to implement actions to address the chlorine dosing issues and prevent future non-compliances with the Lender. It is noted that the STP operators have received some additional technical training on the efficient operation of the STPs

GAC has continued the air monitoring of particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), although some monitoring rounds were delayed or missed due to the lack of a vehicle. No issues were reported regarding compliance with the 24-hour limit, and will be evaluated in detail at the next IESC audit. The E&S Manager has undertaken a review with the team of all environmental monitoring to focus the monitoring on the areas of operations and the key receptors (e.g. community wells). The IESC agrees with this approach and requires GAC review this against the recommendations of the ERM revision of the air modelling completed (December 2021). GAC has also continued evaluating community participation in the monitoring enabling more data to be gathered and should also result in the communities assisting protect the monitoring equipment, such as the diffusion tube monitoring.

The explosives storage and delivery to the blast area is managed for DTP by Auxin who recently took over as the contracting role. The explosives store is owned by DTP, but controlled and managed by Auxin. Auxin also provide their services to GPC for the blasts on in the areas mined by them; however the explosives for GPC are delivered by road from Boké, which is approximately 36 km away. The IESC considers that this regular transport of explosives on the road from Boké presents an unnecessary risk to the public and other road users, and which in the event of an accident could cause multiple fatalities and significant reputational damage to GAC and its lenders. This risk could be eliminated through Auxin providing the service to GPC from the DTP explosives store. Given that it is the same contractor (Auxin) the IESC recommends that GAC works with DTP, GPC and Auxin to achieve a solution to this and remove the need to regularly transport explosives on the road from Boké, and remove this significant Project risk.

### Health and Safety

The review of the monthly safety performance shows GAC continues to operate at a high level with regards to the proactive focus on task observations, safety training, etc. The leading indicators have been extended to 11 with the introduction of permit to works and safe operating procedure audits (yet to commence). The focus on cultural and behavioural changes effort in 2022 has included senior Management engagement on safety standdowns and the reward and recognition of positive behaviours. There has also been leadership training program for local Supervisors, and contractor safety improvement program with contractor involved in LTI in January. The aim is to have safety more strongly owned by the management and not just by the Safety Department.

GAC had rolled out and tested SAP mobile app which allowed the reporting of H&S observations and had resulted in over 1,000 per month being posted. However, it has found the EHS reporting to be limited and it is now looking for a replacement such as Interflex or Velocity which is better designed for the mining sector and has the flexibility GAC needs.

The new medical centre on the Tinguilinta site was visited and the staff interviewed, and it was found to be well equipped and managed, and the team reported back to the Health Manager at Kamsar. Covid cases are continuing to decrease in Guinea and GAC has no active cases at the end of May 2022. Of the 1,099 rapid antigen tests completed this year, there were three positive cases identified in contractors (mild or asymptomatic).

GAC is positively pushing the ownership of safety a responsibility down through the organisation. This includes the team responsible for journey management on the roads. This however appears to have led to a move away from the original policy of not driving at night to condoning this practise, resulting in journeys being undertaken well before dawn and after dusk. This is considered to present a significant risk to both employees in the vehicles and

other road users including pedestrians on the poorly paved unlit roads. It is recommended that GAC develops a journey management risk assessment which aims to minimise the risks of driving in the dark (accidents and from driver fatigue), such that, unless risks can be demonstrated to be negligible, night driving is an exception which requires senior management approval.

As of the end of May 2022 the lost time injury frequency rate (LTIFR) was 0.41 (with one lost time injury) which is above GAC's target of 0.2. GAC's TRIFR is 1.66 (with four recordable cases) which is below GAC target of 4.8, and there have been 2.41 M working hours, over which seven first aid cases have been recorded.

### Biodiversity

A status update on compliance with Lender requirements, as a result of this review:

- ✓ There are three new areas of non-compliance: biodiversity team staffing, tracking effectiveness of mitigation measures, erosion control effectiveness around mangroves at Kamsar.
- ✓ No pre-existing non-compliances have been closed.
- ✓ In total, there are now nine areas of non-compliance related to biodiversity and natural resource issues.

There was insufficient time whilst at the mine site to visit all requested areas (e.g., the dam and reservoir, the Thiouladjiwol pilot CBNRM sites, the community nursery) and therefore to fully observe onsite performance across all key areas. There was insufficient time to visit the Thiouladjiwol pilot site specifically for two reasons: (1) Lenders had specifically requested the IESC visit Boulléré, the originally agreed set-aside location encompassing the Key Biodiversity Area (KBA) straddling both GAC and CBG's concession. This trip requires travel to the far north of the concession and therefore takes up most of a day. (2) There was less time spent at Tinguilinta mine site than anticipated as an EGA senior management visit to the mine meant the IESC/Lender team had to remain at Kamsar for one night more than scheduled, leaving less time available at the mine site). The Thiouladjiwol pilot CBNRM presentation was not able to be completed whilst on site similarly due to the lack of time. Nevertheless, the site visit was a valuable opportunity to discuss new and historical issues with staff and allowed the IESC to make a number of key observations related to GAC's current performance. Ideally, future site visits could allow for more time at mine site to enable the required level of observation necessary to cover all items for discussion and reporting.

#### *Biodiversity Team staffing, resources and resilience:*

During the visit, GAC advised that the contract of the incumbent holding the role of Biodiversity Specialist since April 2020 was not renewed in April 2022. There were delays in negotiating the person's new contract and communication delays contributed to a lack of clarity around the contract renewal. The role remains unfilled. As their departure was unexpected and unplanned, there was no handover of responsibilities from the Biodiversity Specialist to the remaining Biodiversity Team members. The remaining Biodiversity Team members have continued with their own allocated responsibilities but also tried to fill in gaps where they were aware of which threads to pick up. Nevertheless, many deliverables in the Specialist's workstream have stalled, which has resulted in significant gaps in delivery and knowledge about work items previously within their area of responsibility.

Until the right candidate(s) is/are identified and integrated into the Biodiversity Team, the IESC strongly recommend that GAC consider immediately securing one or more competent personnel from an external consultancy, sourcing capable specialists experienced in implementing a biodiversity management program in this region to Lender requirements. This approach needs to minimise further disruption to the implementation of the biodiversity work program, until suitable candidates can be found to fill the role more permanently. As this is impacting GAC's ability to meet Lender requirements, the Project immediately require the support of specialists knowledgeable in BAP development, BMP work program management, technical BMEP oversight, offset program design and implementation, and strategic natural resources management.

Lastly, taking into account the range of priority species on this project, the existing team capacity needs additional personnel with fauna-specialist skills to complement the flora-specialist skills already held within the team. Additional resources to manage manual data-entry and help review the extensive camera trap footage being collected would also benefit the work program.

#### *Biodiversity Management Program:*

A systematic update on all BMP general and species-specific was not available for this review. The IESC recognise that oversight and reporting against requirements of the BMP formed part of the responsibilities of the Biodiversity Specialist role.

The Biodiversity Team advise they are now conducting 2 toolbox talks each month to staff and contractors specifically on biodiversity topics and using posters for species identification and sensitisation.



With the current team resource issues, this has exposed that mitigation measure effectiveness is not being tracked, progress not reported, and adaptive management not occurring. GAC are not tracking their performance as per their BMP requirements or prioritised indicators in the Biodiversity Dashboard. Also, GAC might want to reassess the value from the choice of biodiversity indicators used in the general Environmental Dashboard KPIs.

GAC advise there were no incidents where Environmental Buffer Zones (EBZs), Critical Habitat or priority species were affected since our last review. EBZ boundaries around Plateaus 20 and 26 are inspected monthly, and the land disturbance permit process seems to be working well. In February 2022 a land clearance incident occurred where DTP cleared an area of 0.38 ha in a bauxite waste dump area where no permit had been issued. GAC advised this occurred in a non-sensitive area of bowal on P20, along the roadside to Pit 4. GAC identified corrective actions with the contractor, but the incident report was not made available by our document cut-off date.

The IESC observed new areas of road-edge barrier collapse and berm erosion in the vicinity of Bridge 5 at the Kamsar platform. With the imminent start of the rainy season, it is imperative that surface water run-off discharge is well-managed, and the condition of Critical Habitat mangrove maintained/monitored in the vicinity of discharge areas. The IESC requested a plan for corrective action immediately following the visit, but none was provided by document cut-off date. At Bridge 5 in Kamsar, the full tidal free-flow of sea water to mangrove Critical Habitat in Dougoufissa Creek remains blocked at low-tide; this was originally flagged in 2019. GAC have again committed to resolve the flow of water during the coming few months, when bridge reconstruction is planned.

Rehabilitation of the eight borrow pits reported in previous reports is now primarily complete. A number of these pits are no longer accessible due to regrowth over access tracks to them. GAC's rehabilitation focus has now shifted to the first of the mined areas for rehabilitation and restoration of Pit 4 at Plateau 20 and Pit 3 at Plateau 26; the IESC observed landscaping and ongoing topsoil replacement conducted over the previous 2 months. The trees and shrubs being nurtured at GAC's nursery are the native species listed for use in the Rehabilitation Procedure. GAC state they have sufficient seedlings and young plants for the planned pit rehabilitation, sourcing these from both the GAC and community nurseries.

No update was available on analyses being performed on priority species distribution to better understand the locations of existing wildlife corridors and where they would best be preserved. No update was available on road planning across the concession to minimise fragmentation.

Discussions related to the 5-year mine plan maps indicated initial mining activities are now occurring in the northern half of the concession. GAC stated that plateaus in the north are not yet classified as reserves, so drilling at Plateaus 7 and 15 has commenced to assess the bauxite grade. As this entails GAC scaling up presence in a non-mining area, this should be subject to a Pre-Disturbance Survey. As Phase 2 Refinery development is also now being discussed with the government, GAC should consider how any mining activity in the north relates to existing ESIA and ESIA Addenda, as current activities may fall outside of older 2008 and 2015 ESIA approvals and warrant the submission of additional ESIA Addenda ASAP e.g. the scope of the 2015 ESIA was for the southern concession and reservoir.

Similarly, with activities in the north ramping up, GAC will need to expand and refresh their No Net Loss and Net Gain assessments and offset calculations with regard to priority species/habitats and chimpanzee populations affected – the scope of the Pre-Feasibility Study for the Moyen Bafing biodiversity offset conducted in 2017 accounted only for impacts south of railway line and the reservoir.

Weed management campaigns are occurring once per year at Kamsar, and the IESC observed where weeds have been removed for approx. 1 m around the outside of the platform boundary fence next to mangrove habitat. *Chromolaena odorata* is dug up with roots and burned. GAC should ensure that any use of Glyphosate is kept a minimum of 100m from waterbodies, as per their Procedures. Plans are in place to remove bamboo at the mine site, once budgets are approved and a contractor secured through a procurement process yet to start.

GAC continues to participate in the Bauxite Environmental Network (BEN) to work on issues of joint concern and in theory to manage cumulative impacts. The IESC recommend GAC identify the specific cumulative impacts they are seeking to manage through the BEN, and how these are being monitored. Where there are cumulative impacts that BEN will not help GAC resolve within 3 years, GAC should propose to Lenders how these gaps will be filled within that timeframe. The IESC has requested information on financial support provided to BEN, but this was not provided by the document cut-off date.

The IESC requested the latest version of all OESMS biodiversity management plans and procedures, but these were not available by the document cut-off date.

*Biodiversity monitoring and evaluation program (BMEP):*

Implementation of field monitoring has traditionally been under the responsibility of the Biodiversity Superintendent and Biodiversity Supervisor and their team; thus, implementation of the program has continued building on the good progress reported in the last IESC report. Species identification materials and posters are now developed and in use in Para-Technician fieldwork and sensitisation. A suite of Standard Operating Procedures providing guidance on monitoring protocols are now complete.

The Monitoring Program and Schedule developed previously by the Biodiversity Specialist (for inclusion as Appendix B of the Biodiversity Monitoring and Evaluation Procedure) was not referred to during this review. Similarly, the threshold levels to trigger intervention and adaptive management were not referenced (newly developed Appendix A of the same Procedure). Systematic implementation of the program, and how monitoring results are informing adaptive mitigation, should be a focus area for the IESC's next visit.

Whilst at Kamsar, one of the Marine Para-Technicians led a visit to the local fishing boat dock and market where regular priority species monitoring is undertaken, then a Community Team representative led a visit to the fishing village of Dambassa, between the CBG and GAC jetties.

Benthic habitat monitoring is required annually; a ToR is being developed to go to market to undertake the work.

At the mine-site, freshwater monitoring was completed by SAMEC for the dry season in May 2022; their report should be available within the next 3 months. Follow up freshwater eDNA samples will be collected once the kits arrive (apparently imminently) and then be analysed by Nature Metrics in the UK, as before.

Camera traps continue to be deployed across the north and south of the mine concession, serviced by the mine site Para-Technicians. The species observed, and total number of times observed, were plotted and presented in a bar chart. Analysis of what the results are telling GAC and how the data can best be used has not yet occurred. Worthy of note is a single camera capture of a 'probable' Red Colobus *Ptilocolobus badius* (EN) sighting, just to the south of the centre of the concession. This is the first time the species has been captured on static camera in the concession. The Biodiversity Team intend to target the area of the sighting with additional cameras to better understand its use of the area and learn more.

Although it's encouraging that more regular biodiversity monitoring is finally occurring, the IESC consider that gaps in BMEP implementation and evaluation, and the consequences from this, should be fully understood and acknowledged by GAC. As detailed above regarding the BMP and use of indicators, without analysis of what the monitoring data is telling GAC, this leaves GAC vulnerable in not fully understanding the pressures and state of priority species, and how well direct and indirect mining impacts are being managed. Gathering monitoring data is vital, but then needs evaluation to be able to meet IFC PS6 Para 17.

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

The development of No Net Loss/Net Gain (NNL/NG) metrics for all priority species and habitats, stewarding the methodology for calculating habitat condition ('Quality Hectares'), the development of targets (and interim targets), and development of the Biodiversity Action Plan all fell within the Biodiversity Specialist's remit. Therefore, progress in their development has generally stalled. Last year, GAC had aimed to develop a Biodiversity Action Plan (BAP) by the end of the year. For the Dec 2021 IESC review, the Biodiversity Specialist indicated the BAP had been developed, was under internal review and was to be available by mid-2022. However, with the departure of the Biodiversity Specialist in March 2022, during this visit the remaining Biodiversity Team members had no update on its status and were unsure if it was accessible on the server. Lenders consider development of an appropriate BAP as very high priority, as this should be providing detail on how GAC intends to achieve and demonstrate NNL and NG across all required priority species and habitats. Given the strategic importance of the BAP, GAC should immediately deliver a plan to Lenders on how the outstanding high-priority BAP non-compliance item 7-1 will be closed prior to next IESC visit. In addition, due to activities now being conducted in the north of the concession, the BAP scope should be updated to reflect this. All relevant staff should be trained in BAP components and become familiar with how NNL and NG will be achieved and maintained. Note, it is IESC's opinion that Lenders should consider this a red flag due to the lack of urgency observed over several years requesting progress on NNL/NG demonstration.

The scope of the 2016 Chimpanzee Offset Pre-Feasibility Study and Strategy for the GAC Bauxite Project (referred to as the Pre-Feasibility Study, or PFS) focussed purely on impacts related to activities south of the railway line

running roughly E-W across the concession. With activities now taking place in the northern half of the concession (grade drilling and potential refinery planning, GAC will need to reassess their biodiversity loss (and gain) calculations. This is in addition to updating a residual impact assessment.

Regarding GAC's Quality Habitat Hectare Methodology developed during 2021, no progress update was provided on its finalisation or use. Staff training on use of both the Methodology and Field Guide documents was undertaken in Dec 2021 and both were to be finalised following training discussions and ground-truthing of satellite imagery in the field. The contractor's scope of work was also to deliver a land use/land cover change assessment based on assessment of satellite imagery sourced specifically for this work. This was to look at changes in land use/condition when compared to 2009 imagery, but this assessment has not been seen. The IESC repeat their recommendation to ensure this work has been completed/delivered, and that it provides the analysis that aligns with GAC's needs, again to feed into an updated residual impact assessment.

The Biodiversity and Social Specialists from the IESC team were able to undertake their first visit to the Moya Bafing National Park (MBNP) in the two weeks preceding the IESC site visit in May. The RINA team wishes to acknowledge efforts by GAC, CBG & WCF for enabling safe passage and for the fruitful discussions held, allowing the team to achieve nearly all of the visit objectives discussed in April. For this second RINA Review, the team were able to observe offset program (MBOP) activity implementation on the ground and discuss the program, challenges and benefits with community members, company representatives and WCF staff in the field. The team had the opportunity to meet with WCF Country and Park Managers in their Labe office for presentations, discussions and follow-up questions, both before and after RINA's time in the Park. Since the MBOP Director left in Aug 2021, the MBOP Technical Manager has been deputising for many of their responsibilities; this reduction in staff resource has predictably had consequences on fulfilment of some aspects of the full MBOP work program. A draft report detailing RINA's Review of the MBOP is currently being prepared and will be available to the MBOP Partners by mid-July for fact checking.

Regarding the mangrove offset, following the most recent external review reported in recent IESC reports, GAC now state that a pilot project is to be undertaken in the near future, as the USC report suggested abandoned rice paddies. However, the USC report states the potential for mangrove restoration on abandoned rice fields requires further research and suggests rice paddies need to be fully characterised prior embarking on any mangrove restoration. GAC state their pilot project will commence to the south of GAC's platform, then be rolled out to other localities in Taïgbé and Taïdy where rice paddies at these three sites were abandoned due to excessive seawater inundation. The IESC has written in previous reports that GAC requires specialist mangrove and specialist offset technical assistance, to scale up from piecemeal restoration attempts and instead develop a Lender-approved biodiversity offset program to compensate for the lost mangrove habitat in the vicinity of the Platform at Kamsar and quay.

GAC is undertaking additional conservation activities as part of their approach to NNL/NG for marine species, specifically for African Manatee, Atlantic Humpback Dolphin and marine turtles. Fieldwork for any of the studies has not yet commenced. For the Atlantic Humpback Dolphin studies, surprisingly negotiations are still ongoing regarding research objectives. The IESC encourage GAC to maintain positive negotiation momentum, resulting in scientifically robust studies and additional conservation action.

*Legally protected and internationally recognised areas:*

Lenders have long encouraged GAC's original suggestion to support the establishment of Boulléré (considered a Key Biodiversity Area, KBA) as a set-aside for priority species, especially restricted range species. During this visit, GAC's Biodiversity Team took the IESC Biodiversity Specialist to again visit part of the Boulléré KBA. Lenders had specifically requested the IESC try to visit, to be able to follow up on observations made earlier. The IESC can confirm quite extensive habitat degradation in the area visited within the boundary of the KBA on both sides of the concession boundary, as areas of forest reported to exist previously are now degraded either through recent pre-cultivation burning or under early-growth cashew plantation.

The IESC recommend GAC seek specialist technical support, working alongside CBG, to identify the extent to which biodiversity values might have been eroded, and the feasibility of preserving the value that does remain. If still appropriate, a proposed conservation plan should be developed to restore Boulléré biodiversity value through forest and headwater restoration, considering the need for communities within the boundary to maintain/attain sustainable livelihoods and their reliance on ecosystem services. In an attempt to preserve whatever biodiversity value remains within the Boulléré boundary, the IESC suggest that GAC attempt to avoid any further degradation within the Boulléré boundary, and consider paying an immediate compensation for use of the land as a set-aside i.e., instead of compensating the landowner to use the land for mining or for permanent infrastructure, the

compensation is instead paid to enable preservation and restoration of biodiversity (for as long as residual mining impacts persist on the concession).

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

In recognition of the widespread land use change observed over successive visits, GAC had previously agreed to develop a CBNRM Strategy to guide a program of community based natural resource management. A contractor was to be retained to undertake the landscape level assessment agreed in November 2020, to help develop a program for (a) conducting a landscape assessment identifying and mapping biodiversity priority areas / objectives and community land use / livelihoods / ecosystem needs, (b) build CBNRM-related community capacity, and (c) improve effective communication with communities tying in post-mining rehabilitation/restoration of land. No update was available on Strategy development or landscape level assessment.

The Biodiversity Team presented the current status and intended approach for GAC's smaller 'pilot' CBNRM program in the Thiouladjiwol Valley. GAC are aligning this program with a pilot set-aside program in the same area, with the aim to protect the headwater and surrounding forest. The Team is working closely with the Community Team to help develop the program and engage with key stakeholders such as the local authority and communities within the valley. The program awaits internal budget approval, then the contractor is in place ready to commence the work. If these are to be pilot projects, for both CBNRM and set-aside, the IESC recommends GAC consider how they will measure success of the program and show that negative impacts on natural resources are being avoided. This will ensure adaptations and improvements can be made where necessary, building on these pilots, as programs are rolled out in other areas across the concession.

#### **Labour Management**

In May 2022 the project had 2,970 workers including contracted workforce, approximately 350 more than in May 2021, due to the expansion of the operations. The number of GAC direct employees decreased slightly from 434 in December 2021 to 432. There are 3 less expatriates than in December and one more Guinean. The total number of female direct employees increased by 3 to 39, and there were 152 women working for contractors, 4 more than in December, representing 9% and 6% respectively. Although GAC has developed a Gender Strategy, there is little evidence of implementation as women participation in the workforce had shown a steady decreasing trend over the last two years, with just modest improvement in the last period. The participation of women among contractor workers also increased slightly in the last period after having a decreasing trend over the last four periods. GAC needs to develop a strategy with a strong gender component to operationalise the recently developed Diversity and Inclusion Policy.

GAC continues to train members of the Union executive committee on labour regulations, duties, and rights of Union leadership, and has provided a space for the Union to set up an office in GAC facilities. During the previous review cycle, Union members informed that the main discussions with the Union were centred in the improvement of health insurance for workers and a production bonus comparable to those provided by other companies of the sector in the region. GAC and the Union have agreed on a production bonus, while the insurance issue is related with the health services available in the area and beyond the control of GAC. Health insurance for workers covers 100% of health care, including medications. Other requests by the Union are under assessment by GAC's management.

From January to May GAC received 14 grievances through the HC mechanism from direct and contractor workers related to inaccuracies of payment, sick leave, and benefits. All grievances with the exception of two were closed within 15 days of being received. Through the Compliance reporting mechanism two grievances were logged regarding corruption and financial misconduct. One additional grievance was submitted by Laguires employees to the Security Manager alleging moral and sexual harassment, retaliation, discrimination and corruption. The grievance was escalated to Compliance, investigated and resolved together with Laguires management. This grievance was not included in the Compliance or HC records provided by GAC. In addition, As reported in the January 2022 IESC report, in January, Laguires workers held a national strike that was resolved after 10 days and resulted in a 20% salary increase. GAC needs to ensure that all grievances are properly recorded in the appropriate mechanism.

During the site visit, there were indications of inappropriate behaviour with female workers. This and the importance of implementing a comprehensive Gender Strategy, as has been requested by the IESC since 2020, was discussed with the GAC's head of Compliance.

GAC needs to review and revise its labour audit process to ensure any issues or potential conflicts are being identified and addressed early. At the time of the visit, GAC was not auditing labour aspects of its two contractors with the largest workforce. Labour audits of all contractors should be conducted on a regular basis and include document review and field inspections of working conditions to against all Guinean regulations, GAC HR policies and IFC PS2 requirements.

## Social Management

With the restructuring of the company in Q1/Q2 2022, the Manager of Community Relations, responsible for Social Management, including stakeholder engagement, resettlement, livelihood restoration and compensation, and influx management, now reports to the Environment and Community Director. The new structure is considered to be more conducive of the necessary coordination between environment, biodiversity and social management.

The community relations team was strengthened over the last review period with the re-instatement of 13 Community Relays and continues to make some progress addressing pending issues, however social management capacity still needs to be reinforced. Non-compliances remain pending from the start of the IESC reviews in 2020, in particular related to resettlement and livelihood restoration.

### *Community Relations:*

According to the training plan, after training on the E&S management systems has been provided to the members of the Executive Committee in May, the training matrix and responsibility for the development of training plans for employees in all levels of the organization has been transferred to the Human Capital department. Training for the Community Team is expected to commence in June.

The monthly average number of interactions with stakeholders during the first four months of 2022 was reduced significantly compared to previous periods (45 interactions compared to 70 during the second half of 2021). During the review period, the leading topic addressed in community interactions were health and safety, land access, livelihood restoration, community development and GAC procedures. Land access interactions had a relative significant increase over the previous period, likely due to the upcoming development of Plateau 31, expansions of Plateau 20 and 26 and initial surveys of Plateau 7 and 15.

Women continue to be underrepresented in many engagement activities and community committees. For example, over the last year in 25 consultation fora conducted by GAC with a participation of 943 community members, under 20% were women. An action item has been opened since the first IESC report in 2020 and GAC has been reporting for that an update of the Gender Strategy addressing community and stakeholder engagement issues is being developed. The latest information provided during the site visit was that the completion of the strategy and its incorporation in the SEP are expected in October 2022. GAC is encouraged to conduct focus groups with women as part of its consultation activities to increase female participation and ensure their questions and concerns are addressed and their views considered in the development and implementation of plans and programs.

GAC's previous decision to decrease the community relations resources reduced the capacity of engagement with local stakeholders. Communities visited during the site visit considered that they need to be engaged by GAC more often and in a more meaningful way, suggesting that engagement during the operations phase needs to be increased to maintain community trust and a positive relation. The community relations team committed to increase the number of engagements with each of those communities. However, it is not clear if this is possible with the current resources assigned to Community Relations.

### *Grievances and Conflict Management:*

From January to May 2022 GAC received 7 grievances, the lowest number of grievances received in the last six semi-annual periods. During the site visit, it was observed that grievances may not be registered, especially those that are brought forward during community meetings. Similarly, the RAP monitoring report indicated that local authorities and resettlement committees may be filtering grievances rather than transmitting to GAC for registration and resolution. GAC needs to review the grievance mechanism specifically the reporting and recording processes and ensure it is being implemented as intended. Reinforcing awareness and providing training to the local authorities and members of resettlement committees may be necessary.

The number of blockades during the period was the lowest since the start of operations. There were three blockages related to issues with compensation and a labour conflict at subcontractor level. All blockages were resolved within an hour with the support of the community relations team.

### *Social Investment:*

As per Guinean legislation, GAC made the third contributions to FODEL in April 2022, however no funds have been used for local development as the mechanisms to select and control projects are still not fully defined. FODEL bank accounts continue to be frozen since the change of government in September 2021. Recently management of FODEL was transferred to the National Agency for Financing of Local Communities (*Agence Nationale de Financement des Collectivités – ANAFIC*), which is mainly in charge of funding public infrastructure projects and may result on loss of control over investment by local communities. To address and minimize identified risks, GAC, with the support of the IFC, is leading the development of a multi-stakeholder monitoring platform and a monitoring



and evaluation plan with the participation of the Government of Guinea and the Chamber of Mines. GAC also informed that the IFC is conducting a study to provide recommendations to the government on how to structure and manage FODEL to better address local community needs.

Through its Corporate Social Responsibility programs GAC continues to focus on supporting economic development and health and safety. During the site visit the IESC participated in a meeting at Filima with the NGO engaged to implement a microcredit program and over 50 community members. The community consider the microcredit program a high priority activity and expressed their frustration with the delays in implementation and the lack of access to funding. The NGO clarified misunderstandings and is expected to start providing microcredits for the development of local businesses in the coming weeks. Also, during the period GAC launched a malaria prevention campaign which included prevention awareness and the distribution of 5,000 mosquito nets.

#### *Community Health and Safety:*

One of the main safety risks for communities is related to road incidents. GAC is implementing the Strategy for Safe Transportation and has installed safety infrastructure including stairs and pedestrian crossings, signs, reinforced concrete beacons, and checkpoints in roads at plateaus 20 and 26. Community relays are stationed in main crossings of community access routes and haul roads to reduce the risk of incidents. During the site visit, however, it was noticed that not all pedestrian crossings were appropriately signalled. GAC should review all community routes and haul road crossings to ensure they are adequately marked, signalled and controlled to avoid incidents.

Blasting has increased considerably in 2022 from approximately 16 events monthly during the second half of 2021 to an average of 27 events per month in the four first months of this year. GAC is implementing a safe blasting strategy which includes formally informing village authorities 24 hours in advance. Community relays have been reinstated to notify community members of the place, date, time and safety buffer area limits of each blasting event. GAC has conducted and shared with communities' technical studies showing that blasting does not have measurable impacts on community structures. No grievances related to blasting were registered over the review period.

During the last months of 2021, during the rainy season, GAC received 5 grievances related to impacts of run-off water and red mud from haul roads and other operations areas. GAC requires its contractors to develop rainy-season readiness plans and implement mitigation measures. As the rainy season starts, GAC needs to increase monitoring of potential erosion/sediment run-off risk zones, assess any impacts to communities and their lands and implement mitigation measures for stormwater and erosion control.

#### *Influx Management:*

GAC continues monitoring impacts and implementing measures to attenuate the negative impacts of influx, mostly by supporting villages to establish management procedures for in-migration. The consultant AMERI was expected to conclude demographic studies for these 10 villages in May, and GAC is in the process of recruiting a contractor to strengthen the capacities of local elected officials in 30 priority villages identified in the concession to complete the target for 2022 of creating influx management committees for 60 villages. As previously planned, GAC should conduct meeting with other mining operators to create an influx management network and reinforce the influx management framework to develop local capacity and support communities to monitor immigration and develop village zoning and land management plans.

#### *Security:*

During the review process, GAC informed that the security risk continues to be rated as medium, considering both the situation in the country and project specific considerations. Security arrangements have not been modified and GAC continues to work with the private security contractor Laguipress who provides 500 unarmed guards. Four armed security guards are stationed at the explosive's magazine. Although Laguipres provides male and female guards, during the site visit, it was observed during the site visit that a male guard was conducting a security check of three female employees as they were leaving the Kamsar facilities. GAC needs to ensure that enough female guards are available, to avoid potential situations where women may feel uncomfortable or threatened and reduce the risk of gender-based violence by security personnel

The latest comprehensive Security Risk Assessment (SRA) was conducted in January 2022, in accordance with the SMP, which requires annual updates. The SRA was presented in draft form as part of the request for additional information. The SMP was updated in April 2022 considering the latest SRA.

#### *Land Acquisition, Compensation and Resettlement:*

Most resettlement commitments in Béli Kindy, Filima and Sinthourou Thiouladji, have been completed. As part of the resettlement commitments GAC supported the implementation of waste management projects in Béli Kindy and



Filima with the designation of a landfill area in each community and training; however, the projects are not currently operational in part because the communities are awaiting the supply of machinery to process plastic, which are to be supplied by GAC. GAC needs to provide the supplies and should continue to support both communities for the operation of the waste management projects.

GAC has yet to initiate the repairs of resettlement homes in Filima and Béli Kindi committed in 2019. Similarly, the repair of the water system has suffered considerable delays. Resolution of these two non-compliances need to be prioritized by GAC. Residents of Filima have also expressed their concerns with the inadequacy of the latrines in the resettlement site. GAC needs to prioritise the repair of houses and the water system in both communities and to seek a solution in consultation with community members and support the improvement of latrines and other community infrastructure which capacity has been exceeded by the increase of population.

GAC reached an agreement with displaced artisans of Dapress in 2020 to re-establish their workshops in an artisan centre to be built by GAC in Filima. After considerable delays which included issues with GAC's internal procurement process, the construction of the centre has yet to begin, which is now considered a major non-compliance that poses a significant risk to the project and a considerable impact to the displaced artisans. This matter requires urgent action that cannot be delayed anymore, including providing support to the artisans, for the formalisation of an Economic Interest Group, opportunities to be part of GAC's supply chain, and assistance to vulnerable artisans.

GAC has recently started implementing the RAP for Plateau 31, where land of 10 villages will be affected by mining activities, and the initial surveys for future access to Plateaus 7 and 15. Recognising that finding replacement land is increasingly difficult due to cumulative impacts caused by mining activities, the community relations team, in working with the mining department to reduce the footprint of the mine, specifically in high agricultural value lands. For Plateau 31 GAC was able to reduce the original mining area by approximately 15%. Furthermore, GAC is in the process of reviewing and revising the LACRF and related procedures to provide additional options for livelihood restoration and compensation different from replacement land, streamline acquisition of small extensions of land covered by existing RAPs, and reduce the risk of displacement from replacement land. The revised LACRF needs to be fully compliant with lenders requirements and provide viable livelihood restoration options and considerations for vulnerable affected people.

Preparation for the completion audits of the Béli Kindy, Filima, dam and water pipeline are underway. The completion audits are expected to be completed by December should mitigation measures have been substantially completed and displaced persons are deemed to have been provided adequate support and opportunity to sustainably restore their livelihoods and living conditions.

#### *Cultural Heritage:*

During the delimitation of plateau 31 in Q3 and Q4 2021, 4 cultural sites were identified with the support of community guides (1 non-replicable). Geolocation information completed with the technical support of a specialised consultant has been provided to the mining department and contractors. The community relations team will continue to engage with communities to determine the management protocol for each identified site and train mine operations personnel in accordance with approved procedures.



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