PROJECT: BOKE MINE RAIL & PORT PROJECT

COUNTRY: REPUBLIC OF GUINEA

RESETTLEMENT ACTION PLAN SUMMARY FOR MINING INFRASTRUCTURE COMPONENT OF THE PROJECT IN BÉLI KINDY

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1. **Introduction**

This document summarizes the draft Resettlement Action Plan (RAP) for the mining infrastructure of the Guinea Alumina Corporation (GAC) Project. It addresses the land acquisition and displacement impacts related to mining infrastructure in the locality of Béli Kindy (Guinea, Boké Prefecture, Tanéné Préfecture, Danbanguian District, Béli Kindy Sector).

This RAP is based on, and elaborates upon the Land Acquisition, Compensation and Resettlement Framework prepared as a policy document by GAC and available in the public domain as part of the Social and Environmental Impact Assessment (SEIA) of the Project.

The project to enhance bauxite mining and establish an alumina refinery in the Sangarédi area started in the early 2000s under the name GAPCO and was developed further by companies BAC and GAC, which involved different shareholders. In 2008 a first set of environmental and social documents, including a Resettlement Action Plan, were cleared by the Guinean regulatory authorities and publicly disclosed under the auspices of the International Finance Corporation, which was then considering potential involvement in the GAC venture. However, due to political instability in Guinea, the project was put on hold by its then shareholders and eventually sold to another group of shareholders.

Emirates Global Aluminium (“EGA”) is the current owner of GAC. It is a 50/50 joint venture company held by Mubadala Development Company of Abu Dhabi and the Investment Corporation of Dubai. EGA is an aluminium conglomerate with interests in bauxite/alumina and primary aluminium smelting, and plans for significant international growth.

On 24th November 2013 a new agreement was signed between the Republic of Guinea and GAC, which sets out the phased development programme for the development of a bauxite export mine, followed by an alumina refinery. During the whole course of the GAC development plan, it has the potential to deliver about USD 5bn in foreign investment into Guinea and to create several thousand direct and indirect jobs.

2. **Project Description**

The main components of the project development include:

- The construction of a greenfield bauxite export mine in the Sangarédi area that will be operational in 2018;
• The development of a port in Kamsar by 2017, with associated infrastructure to link this port to existing rail and road infrastructure.
• The National Assembly of Guinea approved the GAC project scope in June 2014, defining two phases of implementation. The first phase is described as follows, and is scheduled to begin in end 2016 - early 2017:
  • The development of a greenfield bauxite mine in the Sangarédi prefecture of Boké region;
  • The construction of a multi-user port terminal and a commercial quay in Kamsar (which actually started in 2010);
  • An upgrade to the existing Kamsar – Sangarédi rail system to link the mine with the port in Kamsar, to allow for the transportation of the bauxite from the mine to the port and for the import of production consumables;
  • Various harbor and channel works, including an expanded navigation channel and transshipment operation to enable export of bauxite by larger vessels; and
  • The construction of supporting infrastructure for the mining, rail, port terminal and marine operations.

**Figure 1: Mining Infrastructure and Project Footprint**

3. **Legal and Institutional Framework**

3.1. **Overall Legal Framework**

The legal framework to the Project is relatively complex due to its long history. It is mainly governed by the Basic Agreement (2004) and its amendments, annexes and attachments. At the time the Basic Agreement was signed with the Government of Guinea, the Mining Code of 1995 was in force. However, a new Mining Code was adopted by the Guinean Government in
September 2011 [further amended on 8 April 2013 (L / 2013 / No053 / CNT)]. This amendment specifies certain legal standards concerning employment and training of personnel for mining companies. These standards are now part of the consolidated version of the Mining Code in its version of 24 April 2013 (Articles 107 to 109).

3.2. Basic Agreement
The Basic Agreement “for the construction and operation of an alumina refinery in Sangaredi” was signed in October 2004 between the Government of Guinea and GAC. It includes a number of provisions relevant to land acquisition, resettlement and Government participation therein. These are contained in Articles 12.2, 20.1, 20.2, 21.1 and 26.1 of the Basic Agreement and are essentially the following:

- 12.2: “The State grants the Investor … the right to … (ii) secure the Port Area and the Industrial Zone by installing fencing or other suitable material on the Port Area and the Industrial Zone; (iii) restrict the access of persons to the Port Area and the Industrial Zone”;
- 20.1: “The Investor agrees to (i) conduct all Project activities regarding the Environment in compliance with the Authorisations and current legislation and the applicable World Bank Guidelines…”;
- 20.2: “The State guarantees to the Investor that … if the Investor is not in a position to carry out the resettlement in compliance with all applicable World Bank Guidelines, then the State shall carry out such resettlement in compliance with all applicable World Bank Guidelines upon the request of the Investor”;
- 21.1: “The State, particularly through ANAIM, undertakes to facilitate all steps and procedures by all appropriate measures in accordance with the Current Legislation and undertakes to provide all reasonable assistance necessary for the implementation of the Project”;
- 26.1: “On the basis of the section of the Environmental Assessment (section relocation of population), the State, with the financing of the Investor, shall proceed to the relocation of the population whose presence on the land shall be an impediment to the research, construction, operation and/or transformation works”.

The Basic Agreement recognises that GAC will carry out land acquisition and resettlement in conformance with World Bank Guidelines. Furthermore it establishes an obligation upon the State to facilitate the land acquisition and resettlement process, and to step in should GAC experience difficulties in securing land.

GAC’s commitment is to comply with the basic agreement, annexures and amendments and the 1995 mining code. Any changes in Guinean legislation will only impact the project if: (i) they do not negatively impact the economics of the project, and (ii) introduced through the prescribed mechanism. The prescribed mechanism designates the process of discussions between GAC and the Government, the terms of which are defined in Article 217 of the said new Code (2011).
3.3. Applicable Laws of the Republic of Guinea
Key Guinean laws applicable to the Project with relevance to land tenure, expropriation and compensation, are as follows:
- The Constitution of the Republic of Guinea (May 2010),
- The Land Rights and Domanial Code, March 1992, ("Land Code"),
- The Mining Code, April 2013, ("Mining Code"),
- The Urban Code.

The following laws also contain some relevant provisions: The Civil Code, The Pastoral Code and its implementation decrees, The Forestry Code.

3.4. International Standards
3.4.1. The IFC’s Performance Standards
IFC’s social and environmental policies include an overarching Sustainability Framework, and eight Performance Standards. This set of requirements was first issued in 2006 and was revised in 2012. The 2012 version is the one applied to projects. In addition to the IFC itself, all major bilateral Export Credit Agencies, as well as commercial banks signatory to the Equator Principles apply the IFC’s Performance Standards.

3.4.2. AfDB Integrated Safeguards System
The African Development Bank Integrated Safeguards System (ISS) was adopted on the 17 December 2013 by AfDB as a cornerstone of the Bank’s strategy to promote growth that is socially inclusive and environmentally sustainable.

3.5. Gap Analysis
The following table identifies gaps in Guinean law against international requirements (IFC’s PS5 and ADB’s OS2) and recommends measures to address such gaps.

Table 1: Review of Guinean Legislation Against IFC’s PS5 and AfDB’s OS2

<table>
<thead>
<tr>
<th>Theme / Issue</th>
<th>Guinean legislation</th>
<th>PS5 / OS2</th>
<th>How can the gap be bridged</th>
</tr>
</thead>
<tbody>
<tr>
<td>Avoiding or minimising displacement</td>
<td>No specific provision</td>
<td>Displacement must be avoided or minimised</td>
<td>The on-going Feasibility Studies for infrastructure component of the Project consider displacement, amongst other factors, in the design optimisation process for the rail track and port.</td>
</tr>
<tr>
<td>Theme / Issue</td>
<td>Guinean legislation</td>
<td>PS5 / OS2</td>
<td>How can the gap be bridged</td>
</tr>
<tr>
<td>---------------</td>
<td>---------------------</td>
<td>-----------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Resettlement planning and associated documentation</td>
<td>No specific requirements in legislation but recent practice on similar projects has been that resettlement plans were to be submitted, publicly disclosed and consulted upon as part of the documentation pertaining to the Social and Environmental Impact Assessment (SEIA)</td>
<td>Plan to be prepared and publicly disclosed</td>
<td>No gap: current Guinean practice is aligned with international requirements and good practice</td>
</tr>
<tr>
<td>Consultation and disclosure</td>
<td>Expropriation Decree to be disclosed individually to affected owners but no provision for collective consultation Consultation on the SEIA</td>
<td>Resettlement planning to include meaningful engagement with affected persons and other stakeholders and disclosure of draft and final resettlement frameworks or plans</td>
<td>Consultation and disclosure to be implemented (i) as part of the mandatory, broader SEIA consultation process, and (ii) as a separate exercise targeting affected communities only</td>
</tr>
<tr>
<td>Valuation</td>
<td>Market value (“valeur vénale”). No specific valuation methodology is mandated by Guinean legislation to arrive at market value and practice varies. Local authorities may have been using set rates developed for previous projects, which could be outdated or incomplete.</td>
<td>Replacement value – See definition in IFC PS5</td>
<td>Project to establish sets of rates for crops, trees, and structures meeting the IFC replacement value requirement and discuss them with local authorities to seek their endorsement.</td>
</tr>
<tr>
<td>Theme / Issue</td>
<td>Guinean legislation</td>
<td>PS5 / OS2</td>
<td>How can the gap be bridged</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Informal occupants on State, municipal or others’ land</td>
<td>In most cases, land is not titled and is deemed State property, such that no private occupants are eligible to land compensation. In practice, <em>bona fide</em> customary users are generally recognised and eligible subject to endorsement of their <em>bona fide</em> occupation by local authorities (local chiefs).</td>
<td>Potentially eligible to compensation of structures, crops and developments if they own these, regardless of land ownership</td>
<td>Provisions applicable to customary and informal users’ compensation to be specified in RAP</td>
</tr>
<tr>
<td>Livelihood restoration</td>
<td>Not addressed</td>
<td>Transitional assistance and other assistance to be provided where livelihoods are affected</td>
<td>Livelihood restoration assistance to be discussed and provided for in RAP</td>
</tr>
<tr>
<td>In-kind compensation (replacement of land or structures by equivalent properties)</td>
<td>Not specifically addressed (but not explicitly excluded)</td>
<td>“Land for land” based compensation to be preferred, particularly where land is critical to livelihoods. Other forms of in-kind compensation (particularly provision of a resettlement package to physically displaced people) also preferred to cash compensation</td>
<td>Provisions for in-kind compensation (including resettlement packages with replacement properties if applicable) to be detailed in RAP</td>
</tr>
<tr>
<td>Grievance redress</td>
<td>Through the Court system</td>
<td>Should be easily accessible to affected persons (which is not necessarily the case of the Court system)</td>
<td>Pre-judicial grievance redress mechanism to be described in RAP, with judicial redress intended as a last resort triggered only once amicable and extra-judicial efforts have failed</td>
</tr>
</tbody>
</table>
### Table: Monitoring and Evaluation

<table>
<thead>
<tr>
<th>Theme / Issue</th>
<th>Guinean legislation</th>
<th>PS5 / OS2</th>
<th>How can the gap be bridged</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monitoring and Evaluation</td>
<td>No specific provision</td>
<td>Monitoring and evaluation are required</td>
<td>Include provisions in respect of Monitoring and Evaluation in RAP</td>
</tr>
</tbody>
</table>

4. **Project Impacts**

Three villages and a number of smaller hamlets are affected by the Project:

**Villages:**
- Béli Kindy Missidé (or Béli Kindy Mosquée);
- Béli Kindy Cité;
- Bhoundou Lengué;

**Hamlets:**
- Balahoun Pont;
- Béli Kindy Maison;
- Filow Bowal;
- Pompo Kawassa;
- Sinthiouroy Dadhé Pompo.

From an administrative standpoint, all affected communities above are located in the District of Dambantian, Sous-Préfecture of Tanéné, Préfecture of Boké. Although limits of the Béli Kindy Sector are not fully clear, it appears that all affected communities are also located in this sector. Some local residents have sometimes presented the community of Bhoundou Lengué as a “Sub-Sector” of the Béli Kindy sector, but this level of subdivision does not exist in typical Guinean administrative arrangements. Also, Béli Kindy Cité and Béli Kindy Missidé are sometimes presented as one village rather than two separate communities.

4.1. **Impact avoidance and minimisation**

When the RAP team came on board in September 2015, it appeared that some limited changes to the Project design could lead to lower impacts to dwellings and farming. The following changes were discussed between the RAP team and further implemented by the design team:
- Minimisation of impacts to dwellings and farming in village Bhoundou Lengué;
- Avoidance of impacts to dwellings and farming in village Balahoun;
- Minimisation of impacts to farming in villages Béli Kindy Cité and Béli Kindy Missidé.

4.2. **Affected Land**

The Project affects a total of about 230 hectares of land. According to information from the official land department (“Service de l’Urbanisme et de l’Habitat” in Boké), this land is not titled and is held on a customary basis by neighbouring communities and individuals. Not all land affected by the Project is used or allocated to households/individuals. A total of 309 land plots have been identified as affected, the total size of which is 142.2 hectares.
Specifically, some of the land that is affected is “bowé” land of minimal agricultural potential. Such land is typically not allocated to households or individuals and is kept for community uses such as gathering straw.

Of the 309 affected land plots, 139 are agricultural and 170 are residential. For the purpose of this categorisation, “agricultural” means that the sole purpose of the land plot is agricultural (i.e. no house is located on the land plot), while “residential” means that there is at least one inhabitable house on the land plot, but it can also (and in most cases does) include trees and crops.

4.3. Affected Buildings
The total number of affected houses is 227, of which:
- 201 are inhabitable and inhabited residential houses;
- 26 are not occupied, most of which are non-inhabitable houses (incomplete or in disrepair).

In addition, there are 423 ancillary structures, such as non-inhabitable “case” and animal shelters.

4.4. Affected Agriculture & Business
With the exception of two patches of virtually sterile “bowé” land on both sides of Béli Kindy Cité, the affected area is intensively used for agriculture. Five businesses have been identified and surveyed. These businesses use a dedicated structure and include the following:
- 3 charcoal sellers along the national highway RN 22;
- 2 general shops (household items, mobile phone recharge, etc…) in Filow Bowal on the national highway and in Bhoundou Lengué.

4.5. Affected Households
201 residential houses are affected, which are located within 104 residential land plots. The census identified a total of 181 households as living in these affected houses, who will be physically displaced, with the distribution shown in the following table. The total of physically displaced individuals is about 1,500 persons.

<table>
<thead>
<tr>
<th></th>
<th>Béli Kindy Cité</th>
<th>Béli Kindy Missidé</th>
<th>Bhoundou Lengué</th>
<th>Béli Kindy Maison</th>
<th>Balahoun Pont</th>
<th>Filow Bowal</th>
<th>Pompo Kawassa</th>
<th>S. Dadhé Pompo</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of affected houses</td>
<td>40</td>
<td>41</td>
<td>76</td>
<td>3</td>
<td>5</td>
<td>23</td>
<td>9</td>
<td>4</td>
<td>201</td>
</tr>
<tr>
<td>Number of family ‘concessions’ within which these houses are located (indicative)</td>
<td>23</td>
<td>21</td>
<td>39</td>
<td>1</td>
<td>4</td>
<td>8</td>
<td>7</td>
<td>1</td>
<td>104</td>
</tr>
</tbody>
</table>
All households found to be physically displaced are also economically displaced insofar as all of them farm or otherwise derive their livelihoods from assets that are affected. About 55 non-resident landowners have land that is affected (mainly in Bhoundou Lengué) while they do not reside in the Project-affected area. These people will be economically displaced and are not physically displaced.

Table 3: Summary of Project Displacement Impacts

<p>| Total affected area (hectares) | 230 |
| Number of physically displaced households | 176 |
| Number of physically displaced individuals | 1,494 |
| Number of economically displaced households (economically only) | 55 |
| Total number of affected households | 231 |
| Number of affected houses | 201 |</p>
<table>
<thead>
<tr>
<th>Number of affected family homesteads</th>
<th>104</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of affected non-residential structures</td>
<td>423</td>
</tr>
<tr>
<td>Number of affected businesses</td>
<td>5</td>
</tr>
<tr>
<td>Number of affected residential plots</td>
<td>170</td>
</tr>
<tr>
<td>Surface area of affected residential plots (hectares)</td>
<td>27.28</td>
</tr>
<tr>
<td>Average surface area of affected residential plots (m²)</td>
<td>1,600</td>
</tr>
<tr>
<td>Number of affected agricultural plots</td>
<td>139</td>
</tr>
<tr>
<td>Surface area of affected agricultural plots (hectares)</td>
<td>114.96</td>
</tr>
<tr>
<td>Average surface area of affected agricultural plots (m²)</td>
<td>8,270</td>
</tr>
<tr>
<td>Number of affected fruit trees</td>
<td>70,552</td>
</tr>
</tbody>
</table>

4.6. Impacts on community facilities and services

**Water and sanitation** - There is no public water supply system in any of the affected communities. Residents use shallow wells, usually located in their backyards. Wells are built by households and could be shared by several households. There is a drilled well in Béli Kindy Missidé with a foot pump and an iron removal system, but it is in a state of disrepair.

There is no sanitation system or modern dry latrines. Most people use basic dry latrines and a basic separate shower. There is no solid waste collection service in any of the affected communities. Solid waste is recycled by domestic animals or biodegraded, and the fraction that is not biodegradable is dumped and burned from time to time.

**Electricity** – No electrical grid is available in any of the affected communities. A few households operate small individual generators. No solar lighting systems were observed.

**Education** - Access to education is currently deficient in the Project-affected area. There is no Government-run school. There is one community-managed primary school, located in the village of Bhoundou Lengué. It has the status of a community school, with teachers hired and paid by the community (as opposed to Government sponsored schools, where teachers are hired and paid by the Ministry of Education). Amongst children declared by household heads as attending school in the year of the survey (2015-2016), 25% were declared as attending this school in Bhoundou Lengué. It has not functioned in 2015 because of lack of resources, and in practice these children did not attend primary school as a result.

5. Socio-Economic Background and Livelihoods

Socio-economic information for the affected area was gathered in September and October 2015 during a one-month campaign, which included both quantitative and qualitative methods and instruments, with complements in November 2015. Key steps included:

- Initial information about the survey process (local authorities and communities);
- Pre-census (mainly meant to acquire initial information on properties, but in which the socio-economic team participated to become acquainted with affected communities and people);
- Socio-economic survey *per se*, including quantitative household survey and qualitative research, which for the most part took place concurrently with the asset survey.

At every step, affected people were informed and consulted in meetings organised in villages with the assistance of local authorities at District and Sector levels.

The Project-affected area is located about 10 km to the West of Tinguilinta village, the main settlement in the area, and the neighbouring GAC camp. National Highway RN22 crosses the Project-affected area. This important road links the city of Sangarédi (population 80,000 located at a distance of about 35 km to the East) to Tanéné (population 33,000, located at 17 km to the West) and continues westwards to Boké (the Préfecture capital at about 30 km) and further to Kamsar (port at approximately 90 km). The highway runs parallel to the Sangarédi – Kamsar railway, which transports bauxite mined in Sangarédi by CBG for processing in Kamsar and export from the existing Kamsar marine terminal. Both the highway and the railway are important features of the Project-affected area.

Main livelihood activities are subsistence agriculture (extensive slash and burn farming with fallow on the slopes and market gardening and orchards in the valley), some natural resource gathering (fruit, roots, charcoal), small-scale livestock farming, small roadside commerce (particularly related to charcoal), and cashew tree plantation, which is an important (and growing) source of income. Mining activities have a limited employment impact in the concession area at this time (CBG has operated a large scale mining concession next to Sangarédi since 1973); they do, however, affect population movements and land use (retired CBG employees have settled and/or invested in cashew plantation in the area).

**5.1. Land tenure**

Land rights in the area are overwhelmingly customary. No formally titled land plot has been identified. However, customary land tenure systems are complex as however traditional they may be, they are influenced by Islamic and modern law.

Key characteristics of customary land tenure systems are the following:
- Access to land is influenced by social identity and kin-group membership;
- Different layers of rights can coexist for the same piece of land: Individuals, families, lineages and whole communities can have different levels of usage right over the same piece of land. For example, an individual could hold a temporary right to farm over a given piece of land, while this plot is held under a permanent right of use by another individual, and is also part of lineage land and remains under some control by the lineage elder.

Different types of land rights identified in the area include:
- The right to administer land (right to allocate, to transfer and to sell the land);
- The permanent right of use (access and use without prior permission, guarantee of access to land for agriculture);
- The temporary right to use (for short term periods and subject to prior permission).
The exercise of these rights depends on:

- The status of the individual within his family or household, and the history of this family, particularly when and where from they settled. Settlement history is therefore essential to understanding land rights;
- The type of land: community (or collective), lineage, or private land, which itself corresponds largely to the soil type categorisation.

5.2. Livelihoods

Agriculture is declared as the most important activity for 71% of the households and the second most important for 22%. Similarly, it is declared as the first source of income for 66% of households and the second one for 26% (see figure below). The slight difference between the two sets of data is due to self-consumption. While no fully reliable numbers were arrived at in terms of cash income generated specifically by cashew nut production, it is quite clear from qualitative interviews that it is the most lucrative of the various crops produced in the area. For women, gardening and groundnut are of particular significance, except in Bhoundou Lengué, where there is little suitable land for these. Rice is important but is mostly devoted to self-consumption and generates little cash, if any at all.

Almost all (94%) households headed by women declare agriculture as their primary activity. Women-headed households appear to have less diversified sources of livelihood, which probably affects their resilience to hardship.

However, the picture of livelihoods is more complex: while agriculture is a central component, households also rely on a complex combination of different activities (up to 7 according to the quantitative survey), each of which has its distinct economic rationale and objectives; seasonality; gender, social or age drivers; and level of sensitivity to Project impacts. Qualitative investigations were therefore instrumental in allowing the RAP team to describe affected livelihoods as reflected in the following sections.

Almost all households have several different activities to support their income to minimise risks and adapt to a versatile natural environment. Men tend to have more activities than females, as seen in the figure above. Secondary activities include hunting, fishing and gathering Non-Timber Forest Products (NTFP). While salaries and pensions are relatively marginal (only 8% of households declare them as their first or second source of income), artisans (blacksmiths, carpenters, bricklayers, moto-taxi drivers, healers) are numerous, with 34% of male heads of households declaring one of these artisanal activities as either their first or second activity.

5.3. Gender Aspects of Livelihoods

Village interviews and focus group meetings indicate that men and women are both involved in household livelihoods with well-defined roles and responsibilities:

- Men have specific responsibilities like school fees, managing access to agricultural land, paying for clearing land, paying a part of the food to each wife (“la sauce”), dealing with local and administrative authorities;
Women are in charge of producing food for themselves and their children and earning additional cash income for expenditures related to their children (particularly clothes, healthcare and education). In case of temporary hardship, they can rely on their husband. In polygamous households, each wife caters for her own children. Economy of each co-spouse is separate and autonomous.

Activities and incomes are gender specific:
- Market gardening, growing groundnut and producing palm oil are women activities and their first sources of income. Petty trade is an additional source of income for women;
- In contrast, cashew nut, artisanal professions, and formal employment are male-only sources of livelihood.

However, many of these activities require some level of cooperation between men and women even if the income is not shared. For example:
- Producing charcoal production is a male task, but marketing it is a female task;
- Palm oil production and marketing are female activities, but men have to be involved to harvest the fruit;
- Cashew nut production is a male activity but women participate in weeding and harvesting activities.

Women tend to be marginalized in terms of land access, and specific attention is required in devising compensation and resettlement entitlements such that they do not risk losing out in the process. Also a resettlement site that would be more remote from the national highway will be detrimental to women as they currently benefit from the proximity of the road as they use to market fruit and other locally produced stuff.

6. Compensation Strategy and Entitlements
The key principles committed to by GAC in this Resettlement Action Plan are the following:
- Resettlement and compensation of Project-Affected Persons shall be carried out in compliance with Guinean legislation and the IFC’s Performance Standard 5 and ADB’s Operational Safeguard 2.
- Where Guinean law requirements are less favourable to affected people than IFC’s and ADB’s requirements, these latter shall apply.
- Consideration of both physical and economic displacement: impacts from permanent or temporary land acquisition on assets and livelihoods will be mitigated, with both physical and economic displacement taken into consideration.
- Customary land rights are taken into account: land is generally deemed to be State property, and as such loss of customary land occupation land cannot be compensated in cash to customary owners; however, customary owners are eligible to in-kind compensation for loss of customary land occupation, such as land replacement or livelihood restoration packages.
- Compensation is at full replacement value, i.e. market value plus transaction cost.
Affected livelihoods will be restored as a minimum, or preferably improved, and living conditions of affected households will be improved.

Compensation will be delivered directly to affected households or individuals, rather than to a village elder or a Government official for further distribution to affected households or individuals.

GAC will assist PAPs in restoring their affected livelihoods, and commits to provide transitional assistance as necessary if it is observed that livelihoods are not restored to their previous level.

The RAP implementation and outcomes will be monitored and evaluated as part of a transparent process involving independent parties.

A grievance mechanism will be put in place and will be independently audited at regular intervals.

PAPs and, if relevant, host communities will be engaged, informed and consulted during the whole course of RAP development, implementation and evaluation.

6.1. Eligibility and Cut-Off Date

Eligibility under the Project is defined as follows:

- Concession land (including residential land and garden land adjacent thereto) will be allocated to concession elders identified in the census as owning affected concession land;
- Resettlement houses will be allocated to household heads identified in the census as house owners;
- In situations where affected houses are compensated in cash, compensation will be paid to the head of household subject to spouse consent;
- Agricultural land will be compensated to household heads or individual owners recognised by the census as customary landowners;
- Crops and businesses will be compensated to individuals identified in the census as owning them.

Concessions, households and individuals found to be affected at the date of the pre-census are eligible. Affected households include:

- Resident households, including owners and tenants;
- Non-resident households owning a structure (whether residential and inhabited or not, or other non-residential) or recognised as users of an agricultural land plot in the affected area;
- Owners and operators of businesses located in affected structures or on affected land.

The following table shows the cut-off dates for the different affected communities:

<table>
<thead>
<tr>
<th>Community</th>
<th>Cut-Off Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Béli Kindy Cité</td>
<td>30 September, 2015</td>
</tr>
<tr>
<td>Béli Kindy Missidé</td>
<td>30 September, 2015</td>
</tr>
</tbody>
</table>
6.2. Census and Asset Survey
The full census of assets and households potentially affected by the Project started on 7 October, 2015, and was carried out by the same team that had been involved in the pre-census. The census was undertaken in two successive rounds (October 2015, then from mid-November to mid-December) as all land parcels were not accessible during the first round due to on-going rains. The whole exercise was completed on 15th December, 2015.

The census methodology is designed to identify and describe affected physical assets, including land plots and structures, and accordingly to identify all households that have ownership or usage rights in these physical assets.

Structures are identified and described (coordinates, materials, condition, and size), land plots are identified and described as well (coordinates, condition, crop, trees). Further, owners and users are identified with support from community representatives. A group of several community guides were appointed in the pre-census public meeting and helped identify owners and users.

Ancillary structures (such as latrines, showers, kitchens, dish racks, etc.) are not subject to a separate inventory form and are registered together with the main residential structure to which they are related.

6.3. Entitlement Matrix
<table>
<thead>
<tr>
<th>#</th>
<th>Affected Asset</th>
<th>Affected Entity</th>
<th>Eligibility Conditions</th>
<th>Entitlements</th>
</tr>
</thead>
</table>
| 1 | Concession (‘galle’), including residential land with one or more inhabitable houses, and adjacent garden land (‘tapade’) | All households residing in the concession, represented by the concession elder | Be found at the time of the census to own an affected concession with inhabitable and complete house(s) and garden land | Resettlement at the GAC-developed Hakoundé Thiandi resettlement site including:  
- Allocation of a concession plot (‘galle’) in the Project-developed resettlement site including:  
  o Residential land on the basis of 200 m² for each affected house in the Project-developed resettlement site;  
  o Adjacent garden land on a m² per m² basis (1 m² of affected garden land gives entitlement to 1 m² of garden land in the resettlement site), with a minimum of 400 m² per household;  
  o One double VIP latrine for each concession and a separate shower base connected to a soak pit;  
  o The concession land plot will be allocated to the identified concession elder per eligibility provisions above;  
- Reconstruction of as many houses as there were in the affected concession allocated to each household within the concession, on a room per room basis;  
- Cash compensation for ancillary structures such as kitchens, hen pens, dish racks, driers, showers at USD 200 per structure of whatever nature;  
- Moving allowance (USD 200 per household)  
OR  
Cash compensation for those unwilling to move to the Hakoundé Thiandi resettlement site |
<table>
<thead>
<tr>
<th>#</th>
<th>Affected Asset</th>
<th>Affected Entity</th>
<th>Eligibility Conditions</th>
<th>Entitlements</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Incomplete and/or not inhabited residential house, including basements and ruins</td>
<td>Owner of an affected incomplete or not inhabitable and not inhabited house</td>
<td>Be found at the time of the census to own an affected non-inhabitable house</td>
<td><strong>Cash compensation</strong> at full replacement value based on the undepreciated value of materials and labour, based on unit prices</td>
</tr>
<tr>
<td>3</td>
<td>Business structures</td>
<td>Owner of a business structure</td>
<td>Be found at the time of the census to own a non-residential structure</td>
<td><strong>Cash compensation</strong> at full replacement value based on the undepreciated value of materials and labour (typically USD 50 per m²)</td>
</tr>
<tr>
<td>4</td>
<td>Complete and inhabited residential house or apartment within house</td>
<td>Tenant household</td>
<td>Be found at the time of census to reside as a tenant in an inhabitable and complete house or apartment owned by the head of another household See specific eligibility conditions for tenants, including free-of-charge tenants.</td>
<td><strong>Tenancy re-establishment allowance</strong> based on three months of the average rent (USD 50 per room) multiplied by the number of rooms actually occupied, meant to allow the affected tenant household to secure an alternative rental dwelling. AND <strong>Moving allowance</strong> (USD 200 per household) AND <strong>Support from GAC in securing an alternative dwelling</strong>, including by seeking guarantees from resettled landlords that they will allow their current tenants to rent rooms in resettlement housing</td>
</tr>
<tr>
<td>5</td>
<td>Cultivated agricultural land within ‘tapades’ (or ‘galle’)</td>
<td>Owner or customary user of an agricultural land plot within a ‘tapade’ (or ‘galle’) as recognised by the census</td>
<td>Be found at the time of the census to own an affected, cultivated plot of agricultural land</td>
<td><strong>Cash compensation for any annual or perennial crops</strong> observed at the time of the census AND <strong>Replacement land</strong> in the resettlement site on a m² per m² basis with a minimum of 400 m² with soil preparation</td>
</tr>
<tr>
<td>#</td>
<td>Affected Asset</td>
<td>Affected Entity</td>
<td>Eligibility Conditions</td>
<td>Entitlements</td>
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<tr>
<td>----</td>
<td>-------------------------------------------------------------------------------</td>
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<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>6</td>
<td>Cultivated agricultural land outside of ‘tapades’, including large cashew plantations</td>
<td>Owner or customary user of an agricultural land plot not lying within a ‘tapade’</td>
<td>Be found at the time of the census to own an affected, cultivated plot of agricultural land</td>
<td><strong>Cash compensation for any annual or perennial crops</strong> observed at the time of the census AND <strong>Land Redevelopment Allowance</strong> based on the cost of labour required to clear and fertilise a virgin piece of land to a level conducive to open field agriculture (USD 1,000 per hectare, or USD 0.1 per m²)</td>
</tr>
<tr>
<td>7</td>
<td>Non-perennial crops (annual, bi- and tri-annual)</td>
<td>Owner of crop (individual)</td>
<td>Be found at the time of the census to own an affected annual crop</td>
<td><strong>Cash compensation at replacement value</strong> (median market price observed in three markets in the concession area in 2015 x average yield observed in the area).</td>
</tr>
<tr>
<td>8</td>
<td>Perennial crops (trees)</td>
<td>Owner of crop (individual)</td>
<td>Be found at the time of the census to own an affected perennial crop</td>
<td><strong>Cash compensation at replacement value</strong> (total loss of income over the whole period required to re-establish the tree to the same level of production)</td>
</tr>
<tr>
<td>9</td>
<td>Businesses</td>
<td>Owner-operator of business (individual)</td>
<td>Be found at the time of the census to own and operate an affected business</td>
<td><strong>Assistance to relocation at the resettlement site</strong> AND <strong>Compensation at replacement value for lost immovable assets</strong> (including any structures per item 3 of this entitlement matrix and non-movable machinery – if applicable) AND <strong>Business Moving Allowance</strong>, including loss of income over the three-month period required to re-establish the business to the same level of production at the resettlement site, and compensation for the cost of moving, total amount of the Business Moving Allowance: USD 800 per business for shops and USD 200 for charcoal sellers</td>
</tr>
</tbody>
</table>
6.4. Gender Aspects of Compensation

The ‘concession’ land (i.e. the multipurpose residential and garden land plot, or ‘galle’ as they are locally referred to) will be allocated to the elder found in the census to head the different households living in the concession. However, each house within the ‘galle’ will be allocated to the head of household found in each particular house. This is very important from a gender perspective as it will allow to safeguard women’s existing property rights, every woman that owns a house being able to maintain their ownership rights on the resettlement house.

Where a household includes a head and one or more spouses, formal consent of all spouses, including both males and females, will be required before a compensation agreement can be passed. This will apply to spouses identified in the census form regardless of the formality of marriage.

For crops and businesses, eligibility to compensation will be at individual level rather than at household level:

- Crops are deemed individual property and will be compensated to the individuals that have established them, as opposed to household heads or concession elders;
- The same applies to businesses, which are established and operated by individuals.

These are important measures from a gender perspective. Compensating heads of household for crops would result in women being deprived of their right to compensation for crops that they have established and maintained, and which if unaffected they would have sold for their own benefit.

Where a land title (first stage: “permis d’occuper”) is established, GAC will systematically propose to the householders that the document be established in the name of all spouses as co-owners. The “permis d’occuper” and further the land title when established will establish the indivise ownership (“propriété indivise”) of spouses.

Where compensation is paid in cash for land and/or structures, GAC will systematically propose to the householders that the payment be made in an account opened in the name of all spouses.

7. Livelihood Restoration

As a complement to the RAP, the Project has prepared a Livelihood Restoration Plan (LRP) to address livelihood impacts of land acquisition and displacement impacts related to mining infrastructure in the locality of Béli Kindy (Guinea, Boké Prefecture, Tanéné Préfecture, Danbanguian District, Béli Kindy Sector).

Key principles underlying the Project’s livelihood restoration strategy are the following:

- Specific measures will target affected people and will complement the compensation they receive; these include facilitation of agricultural land replacement, preparation of tapade land at the resettlement site for intensive agriculture, provision of tree saplings, and livelihood restoration measures for businesses.
Other livelihood restoration measures will be integrated in broader community development activities that target not only displaced people but the communities in the broader Area of Influence of the Project. These measures are currently being developed and will include, amongst others, support to agriculture and support to business.

7.1. Agriculture

7.1.1. Preparation of Resettlement Land for Agriculture

Affected people will be able to continue farming on unaffected hillside land plots as the resettlement site has been selected to maintain a reasonable distance with these farming areas (2-5 km depending on fields, slightly more than in the previous situation but not such that it could cause any disturbance).

Compensation for trees takes account of the period required to re-establish the plantation to its current level of productivity. This compensation could be paid in several instalments (upon request from the affected person) to enhance livelihood restoration and minimise the risks of cash misuse.

As far as “tapade” land and the associated agricultural system is concerned, the resettlement site is designed to allow affected people to reinstate a similar system within large garden plots neighbouring their residential plot. The size of these garden plots will be equivalent to that of existing affected gardens. In addition, GAC will seek to enhance the initial productivity of these virgin garden plots as follows:

- Upon the completion of house construction, deep ploughing (0.30 to 0.35 m) will allow to open the soil after construction related compaction;
- Initial fertilisation will be applied based on soil analysis (in principle it should entail deep sole placement of phosphorus and potassium fertiliser and superficial placement of a nitrogen-phosphorus-potassium-(NPK) fertiliser, plus micro-nutrients such as boron or manganese if the need is demonstrated by soil analysis);
- Organic matter will be applied (ca. 30 tons/hectare of manure) and final soil preparation made;
- Trees will be planted.

Agronomist input will be sought ahead of construction completion to refine the above methodology. In addition, seedlings of manioc, banana, palm tree and cashew, and seeds of maize and hillside rice may be made available according to modalities that will be discussed with the Resettlement Committee in due course.

7.1.2. Longer Term Activities – Feasibility Study

Pressure on land in the concession due to the rapid demographic increase, mining activities, the somewhat uncontrolled expansion of cashew plantations, and in-migration pose a significant challenge to traditional agriculture, particularly the slash-and-burn, fallow based system on hillside land. Average fallow duration has decreased in the last 30 years from the 12-15 years that would be required to reinstate normal soil fertility to 3-5 years currently. While “tapade” agriculture provides cash crops, condiments and some staples like manioc, the bulk of cereals
(rice, sorghum, millet) and some cash crops (groundnut) that are critical to household food security is still produced on hillsides using slash-and-burn techniques. These techniques may no longer be sustainable in the long run as they make extensive use of a limited resource, hillside land.

GAC is therefore taking steps to study the establishment of an agricultural enhancement programme aiming at long-term improvements to agriculture. Studies have already been undertaken by the GAC Community Development department and are currently in the process of being collated and consolidated into a coherent agricultural development programme that will target PAPs amongst other people.

At this stage, this RAP therefore includes a commitment by GAC to fund the preparation of a coherent agriculture improvement programme based on:

- A long term image of the land and population situation in the concession (taking account of both sides of the Boké-Sangarédi road);
- Currently undeveloped land potential in the concession (to be identified and investigated on a systematic basis), including the review of areas suitable for irrigation, tree plantations, and market gardening;
- A review of current crops and related cultivation techniques and assessment of possible new crops, and technique improvements for existing crops;
- An assessment of the gender impact of agricultural improvements, with measures to reduce the gender gap wherever possible;
- An assessment of activities that could improve the integration of agriculture and animal husbandry.

The feasibility study will be available in mid-2017. Further to this feasibility study, GAC will implement further support to agricultural improvements in the form of a long-term agriculture development programme and implementation of first activities under this livelihood restoration programme is anticipated to start in the second half of 2017 concurrent to, or immediately after the moves.

7.2. Businesses
The Business Moving Allowance is meant to cover business losses during the period required to re-establish the business, and therefore covers the livelihood restoration. In addition, the infrastructure area of the resettlement site may include an area dedicated to a market, subject to consultation with the Resettlement Committee and local authorities, and an area dedicated to the affected and relocated shops, thereby facilitating livelihood restoration of the associated business owners.

8. Vulnerable Groups
Vulnerable people are people who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status, may be more adversely affected by the land
acquisition process than others and who may be limited in their ability to claim or take advantage of compensation.

In the context of the GAC project, potentially vulnerable people include:
- Disabled persons, whether mentally or physically and chronically ill people;
- The elderly, particularly when they live alone without family support;
- Households whose heads are female and who live with limited resources;
- Households who have no or very limited resources;
- Widows and orphans.

Working with relevant local authorities, GAC will seek to ensure that no vulnerable people are disproportionately affected by the land acquisition and resettlement process. The following activities will be implemented in cooperation with local authorities in respect of vulnerable people affected by the GAC project:
- Assistance during the land acquisition and negotiation process, including specific individual meetings to explain eligibility criteria and entitlements, clauses in compensation agreements, grievance avenues;
- Assistance in the payment process (provision of transport to the bank effecting compensation payment, support in the payment procedure, money management awareness, etc...);
- Exemption from the lottery plot allocation system, to allow allocation (e.g. to households with physically disabled individuals) of land plots that will be easier to access (located directly on the trunk street);
- Prioritization for training courses to enhance employability and prioritization for employment by contractors where possible and subject to contractors’ operational needs;

9. Organizational responsibility

9.1. Organization Arrangements

GAC will implement the RAP with its own resources and take full responsibility for its funding and implementation. Other stakeholders will be involved as follows:

**Government stakeholders:**
- The Municipality of the Rural Commune of Tanéné, the Sous-préfecture of Tanéné, and the Préfecture of Boké will facilitate and monitor the whole process, particularly but not only in regards to final allocation to GAC of the Hakoundé Thiandi resettlement site.
- The Préfecture of Boké has an active Resettlement Steering Committee under the chairmanship of the Prefecture’s Secretary General in charge of local communities. This Committee’s role is to oversee, monitor and facilitate any resettlement that takes place in the Prefecture, specifically in regards of mining activities (GAC’s and other mining companies’). It meets on a regular basis and/or at the request of project sponsors. GAC will participate in any meeting of the Resettlement Committee pertaining to GAC’s resettlement activities, will update the Committee on a regular basis of its activities, and
will seek guidance from the Committee in case of specific issues requiring Government involvement.

- The Housing and Urban Planning ("Service de l’Habitat et de l’Urbanisme") department of the Boké Prefecture is responsible for urban land management, creation of spatial planning instruments, and generally land management. It is, amongst others, in charge of delineating urban developments ("lotissements"), establishing and delivering associated permits to developers, and further to establish and deliver occupancy permits ("permis d’occuper"), and land titles. This will be relevant to the establishment of a “lotissement” at the resettlement site, and further award of occupancy permits to resettled households.

- The Ministry of Education is responsible for planning educational facilities and posting teachers and other staff to such facilities.

- The Ministry of Health has similar prerogatives in regards of health care.

- SNAPE ("Service National d’Aménagement des Points d’Eau") is in charge of rural water supply.

**Community stakeholders:**
The community will be associated through its Resettlement Committee, and directly in general meetings at critical milestones of the resettlement process, per the engagement plan.

**Internal GAC Roles include:**
- Resettlement Project Manager
- Resettlement Superintendent
- Site Development and Construction Supervision Team
- Negotiation, Engagement and Compensation Team
- Grievance Management

**10. Community participation**

GAC is committed to implementing IFC and AfDB requirements pertaining to meaningful engagement and consultation. A Project wide Stakeholder Engagement Plan (SEP) has been developed by consultants ERM for the overall project as part of the ESIA process. This SEP will be updated annually, to provide a roadmap for engagement during construction and operation of the Project. The Company is fully committed to the integration of environmental and social considerations in the design and development of the GAC Project, as well as establishing and maintaining constructive relationships with all stakeholders, including affected communities, other affected stakeholders, and other interested parties.

In addition, a RAP-specific engagement plan has been prepared and is submitted as part of the RAP. It integrates into the broader SEP mentioned in paragraph above. It will be elaborated upon as resettlement and compensation activities develop.

**10.1. RAP Engagement Plan**

GAC will continue engagement activities around compensation and resettlement, building on those implemented to-date and on the generally positive reception of the overall resettlement
process. The compensation and resettlement process will involve community- and household level consultations, as follows:

- Hand-over to PAPs of entitlement and compensation calculation sheets based on the agreed upon inventory summary, for verification, processing of any grievances and sign-off;
- Definition for each household of concession grouping arrangements (how houses will be grouped within concessions in the resettlement site, taking household members’ preference into consideration, particularly for polygamic households);
- Hand-over of a household- or individual-level compensation agreement, based on the above calculation sheet and grouping arrangements, and specifying all entitlements and applicable conditions (including GAC’s commitments pertaining to the resettlement site and resettlement housing as applicable, and PAPs’ commitments related to the date of moving, salvaging conditions, etc...);
- Delivery of in-kind compensation entitlements (resettlement housing, plots of land) and payment of in-cash compensation.

At each of these stages, explanations will be provided, both at the community level through the Resettlement Committee on entitlement principles and rates used for compensation calculation, and at household or individual level.

The following RAP engagement activities will be implemented going forward:

- Meetings between GAC and the Resettlement Committee on a regular basis (monthly or more) to discuss compensation and resettlement options, resettlement site development, housing design, other compensation, and grievances;
- General meetings with the whole affected community at critical steps of the resettlement planning and implementation process, including final selection of resettlement sites, house and parcel layout design, disclosure of individual compensation options, disclosure of the final RAP;
- Engagement with other stakeholders on a regular basis (particularly at Préfecture and Sous-préfecture levels), and workshop on resettlement planning towards the end of the planning process with Conakry based stakeholders, including one workshop with relevant ministries (Mining, Urban Planning, Rural Development, Interior) and another with Conakry-based NGOs.

PAPs will be updated directly and through the Resettlement Committee on anticipated moving dates on a periodic basis.

10.2. Grievance Management

The RAP grievance management system integrates into broader GAC-wide grievance management systems, which are guided by the following principles:

- Accessible and easy to use;
- Transparent and accountable;
- Guaranteeing an independent, extra-judicial review of grievances to complainants;
• Keeping grievances confidential.

GAC applies the following guidelines in respect of grievance management and redress:
• Any grievance is registered, acknowledged receipt of within 7 calendar days of its receipt, responded to within 30 calendar days of its receipt, and tracked until it is closed;
• The grievance management arrangement includes two tiers of extra-judicial, amicable review and settlement, with the first one internal to GAC, and the second one involving external parties.

11. Integration with host communities

11.1. Host Community

Hakoundé Thiandi is not really a ‘host’ community and it would be better defined as a ‘neighbouring’ community. Land for the resettlement site is not Hakoundé Thiandi’s ancestral land, it is Beli Kindy’s. Interviews indicated that the people of Hakoundé Thiandi settled there later than Beli Kindy and by permission from Beli Kindy.

Hakoundé Thiandi people are ‘on board’ in the process of delineating a resettlement site. They are being consulted and representatives from Hakoundé Thiandi will sit either in the main Resettlement Committee or in a separate Hakoundé Thiandi committee meant to address their specific issues, if any.

12. Identification and selection of resettlement site, site preparation and relocation

12.1. Review and Selection of Resettlement Sites

12.1.1. Process

The process for selecting resettlement sites was as follows:
• Preliminary identification of potential resettlement sites based on a review of satellite imagery with desk review and some ground-truthing in the field (September 2015);
• More detailed site visits after the end of the rainy season (November 2015 to January 2016) and pre-selection of the most favourable sites;
• Preliminary consultation with affected communities (January-February 2015);
• Selection.

12.1.2. Key Location Criteria

Preliminary consultation with affected households in informal discussions held by the resettlement planning team in the fall of 2015 indicated that their key location criteria for a resettlement site were the following:
• Possibility to access and farm unaffected hillside land located south and west to the current location of the affected villages (meaning in practice that the resettlement sites should not be at a distance of more than – say – 5 kilometres from the current locations);
• Proximity to the highway, in order to continue selling agricultural produce and charcoal to passing vehicles, and to be able to access the towns of Tanéné and Sangarédi easily;
• Adequacy from a cultural, historical and social perspective.
12.1.3. Preliminary Selection

A dozen of potential sites had been identified on a preliminary basis in September 2015 based on a review of available satellite imagery. A review of the 10-year frequency flood map associated with the Tinguilinta River led to eliminating three of these sites. In addition, early consultation with both local authorities (District President) and representatives of affected communities clearly indicated the following:

- Much of the hillside agricultural land currently used by affected communities between the Project footprint and the bauxitic plates will be left unaffected, and resettling physically displaced people close enough to this land so that they continue farming it would greatly help livelihood restoration;
- Resetting Project-affected communities, which are all located in Tanéné Sub-Préfecture, to the right bank of the Tinguilinta River located in Sangarédi Sub-Préfecture would create significant obstacles from political, administrative and cultural points of view.

From the initial dozen of sites that had been considered on a preliminary basis, the following were left for further review:

- Site 1: Bhoundou Lengué East;
- Site 2: Hakoundé Thiandi;
- Site 3: Gobiré;
- Site 4: Thian Alé.

12.1.4. Consultation on Resettlement Sites

When consulted in two occasions\(^1\) in January 2016 about potential resettlement sites, both the Resettlement Committee and a broader group of residents indicated the following:

- No site located on the Sangarédi side (right bank) of the Tinguilinta river would be acceptable to them for historical and administrative reasons; this excludes the Thian Alé site;
- The Bhoundou Lengué site is considered as not conducive to long-term community development because it is located on the other side of the rail and will not be easily accessible from the national highway;
- Preferred sites are the following:
  - Hakoundé Thiandi, with historical links (this site is located on Béli Kindy ancestral lands) and proximity to the current village location and to the plant key factors mentioned by affected people;
  - Gobiré, with proximity to the highway mentioned as the first reason this site appealed to participants.

12.1.5. Outcome of the Site Selection Process

The Hakoundé Thiandi site is preferred for the key following reasons:

\(^1\) Once with the Resettlement Committee, and once two days later with the whole communities. Further consultation took place later in 2016.
- It is the preferred site for a majority of affected households;
- It is large enough to accommodate all affected households within the key sizing parameters listed in section Error! Reference source not found. above;
- It is located on Béli Kindy’s ancestral lands, which avoids potential conflicts with a host community;
- Béli Kindy and Bhoundou Lengué farmers will be able to access their unaffected hillside land residents as it is located within walking distance;
- It is not conducive to influx (as opposed to the Gobiré site) as it is away from the highway (although not far from it);
- Infrastructure built for the resettlement site (particularly access, education, health) will be beneficial to the neighbouring community of Hakoundé Thiandi.

12.2. Resettlement Site Development

12.2.1. Access
A 2.3 km long road will have to be created. A potential routing for this road that avoids resettlement has been devised (see Figure 32). Economic displacement (impacts to agricultural land) will be minimal, if any at all, as land intersected by this route is not farmed due to its largely improper agronomic characteristics. A motorable culvert/crossing will be constructed to serve the resettlement site.

The access road to the resettlement site will cross one of the mining haul roads. As the resettlement site access road will be used by local vehicular and pedestrian traffic, GAC will put in place adequate safety measures, potentially including a boom gate and a warning light, to avoid collisions.

12.2.2. Plot Allocation
Plots within the resettlement site were allocated openly and in a participative way. The Resettlement Committee initially provided a list of households (galle) who wanted to be close together. A big plan of the resettlement site was printed out and these “galles” were asked where they wanted to go on the plan (this is because this was the site of their old villages and many households want to go back to the land occupied by their grandfathers or great grandfathers). This is in the process of being integrated.

The infrastructure area on the right bank will include an area dedicated to a market (with no stalls built by GAC as this has failed in other locations close-by), and subject to consultation with the Resettlement Committee may also include an area dedicated to the affected and relocated shops, unless these elect to be relocated together with their current landlord.

12.2.3. Other considerations
The Gobiré site is very close to the highway and to Tinguilinta settlement, where significant immigration has taken place in the last 10 years in relation to the proximity of GAC’s camp and activities. For these reasons, it appears conducive to further in-migration2, which might be

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2 GAC is currently developing an In-migration Management Plan.
detrimental to resettlers if they were to be relocated there, particularly in terms of competition for land, social facilities, and natural resources. The land at that site is also located on a relatively steep gradient increasing development costs. Lastly, this site is more distant from existing agricultural land that resettlers will still be able to use. For these reasons, GAC is unwilling to take responsibility for the development of the Gobiré site, which might create most undesirable social impacts in the long term, with influx to resettlers housing (with the potential for resettlers to be tempted to cash in by selling their land and/or houses and be left homeless as a result), difficulties in re-establishing agricultural livelihoods, and overall increased dependency from the mining venture.

13. Shelter, infrastructure and social services

13.1. School
GAC will build a three-classroom primary school at the resettlement site within the dedicated public infrastructure area, either on the right bank if technically feasible or on the left bank. A three-classroom school is in line with Ministry of Education guidelines for communities of this size. The building will be designed based on generic layouts already used by GAC in coordination with the Ministry of Education, and will be able to accommodate a potential extension (another three classrooms). It will include latrines per usual specifications, and a drilled well with hand- or foot-pump will be installed nearby.

GAC will not take responsibility for teacher allocation but will engage with the Ministry of Education prior to school commissioning to facilitate staff allocation so that the three classes can function normally. Experience indicates that newly established schools tend to take a few years to be fully staffed.

13.2. Health Care
GAC will build a structure able to accommodate a health post, based on a generic design already used by GAC at the Pétoun Djiga resettlement site in the Northern part of the concession. Similarly to the school, GAC will not take responsibility for staff allocation, which is a responsibility of the Ministry of Health but will engage with the Ministry of Health prior to health post commissioning to facilitate staff training and allocation (usually these posts are staffed by a community member receiving basic training on primary health care).

13.3. Water Supply
Drinking supply will be provided by drilled wells with hand- or foot-pumps. For a population of about 1,600 people in the resettlement site, eight drilled wells are necessary. They will be located such that no house is at a distance of more than 200 metres, and well away from pit latrines to avoid bacteriological contamination of the water.

A Water User Committee will be established in conformance with Guinean usual well maintenance policy. The pump type will be selected to align with hand- or foot-pumps already existing in the area that local people are used and trained to maintaining. It will be checked that trained repairmen are available in the area; if not GAC will liaise with the relevant authority to select and train a qualified pump repairman.
**13.4. Domestic Waste Management**

GAC is considering providing burn pits located downwind for resettled people to dispose of their domestic waste. GAC will support the Resettlement Committee in establishing proper solid waste management.

**13.5. Graveyard**

A graveyard will have to be established as the current Béli Kindy graveyard will not be usable any more (it will be kept accessible to residents with safety related conditions but new burials will not take place there). Consultation will take place with the relevant authorities and the Resettlement Committee to determine an adequate location. The extension of the current Bhoundou Lengué cemetery could provide a good solution as it is well away from any potential Project impacts but this may not be acceptable to the Béli Kindy residents. On a preliminary basis and subject to consultation and technical feasibility, it appears that a suitable location north to the resettlement site may be available.

**13.6. Plantations**

Streets will be planted with alignment trees such as neem (Azadirachta indica) at an indicative spacing of about one every 15 metres, in addition to trees provided to individual households per section 6.5.2.7. Trees will be watered under GAC’s responsibility for one year, and the responsibility will be transferred to the Resettlement Committee after one year.

**14. Environmental protection**

**14.1. Overview**

Potential environmental and social impacts of resettlement at Hakoundé Thiandi have been reviewed, assessed, and the impact mitigation hierarchy has been applied per PS1 and similar requirements. Given the site location, layout and characteristics, potential impacts may include the following:

- Impacts to surface- and ground- water;
- Impacts to forest and habitats;
- Impacts to cultural sites.

**14.2. Surface and Ground Water**

The site is bordered by a semi-permanent stream of some significance, which comes from the Hakoundé Thiandi area and upstream and crosses the settlement of Balahoun downstream before it flows into the Tinguilinta River. No discharge of human waste will be made in the stream at the resettlement site as all plots will be equipped with dry latrines. Awareness of the need to keep the stream clean will be provided to resettlers to avoid any negative impact to Balahoun residents.

Ground water is deeper than the bottom of the dry latrines, such that there will always be an unsaturated layer between the bottom of the latrines and the water table. This unsaturated layer will eliminate potential nitrogen and sulphide pollution originating in faecal matter, as well as bacteria and viruses. No contamination of the local water table is expected as a result.
14.3. Forest and Habitat
The small forested area between the Hakoundé Thiandi resettlement site and Beli Kindy Missidé will be left untouched. Similarly, a buffer will be left between the stream and any earthworks for the resettlement site to avoid erosion that might affect the stream and left vegetation untouched along the stream.

14.4. Erosion
Erosion is a common issue in Guinea in relation to the intensity of rainfall during the rainy season. This will be mitigated as follows:
- During construction, earthmoving works at the resettlement site will comply with GAC’s topsoil management and erosion mitigation procedures;
- GAC will provide trees for plantation per provisions detailed above in sections Error! Reference source not found. and Error! Reference source not found.: these trees will contribute to stabilising slopes and minimising erosion;
- After house are commissioned, GAC will inspect the site on a regular basis to check for potential signs of erosion;
- GAC will also create awareness amongst residents and the Resettlement Committee on the need to monitor and mitigate erosion.

14.5. Cultural Sites
The resettlement site appears to include a graveyard of Beli Kindy residents. The Resettlement Committee has taken steps, with GAC’s support, to delineate this graveyard. A ‘djinn’ (spirit) has also been reported to exist in a wooded area between the resettlement site and Beli Kindy Missidé. This area will be kept undeveloped and any ceremonies that community appointed caretakers indicate are required will be supported by GAC to the extent reasonable.

15. Implementation and Budget
15.1. Delivery Arrangements
GAC will seek to reach negotiated settlements with all PAPs on an amicable basis. It is not anticipated that compulsory procedures such as expropriation will have to be used.

15.2. Budget (November 2016 estimate)
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<tr>
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<th>Item</th>
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<th>Quantity</th>
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**Sub-Total 1 - Site Development** 9,562,000

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**Sub-Total 2 - Cash compensation** 5,137,000

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**Sub-Total 3 - Assistance to vulnerable people** 100,000

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<td>41. Fruit tree seedings</td>
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**Sub-Total 4 - Livelihood Restoration** 731,500

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<td>52. Consultants</td>
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<td>53. External monitoring</td>
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**Sub-Total 5 - Implementation** 918,000

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**Sub-Total 6 - Contingencies** 1,644,850

**GRAND TOTAL** 18,093,350 Rounded to 18,100,000

32
15.3. Implementation schedule (November 2016 estimate)

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<td>Grouping of households into concessions and related negotiations</td>
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<td>Hand-over of compensation sheets</td>
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<td>Adjustments on resettlement entitlements and sign-off</td>
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<td>16</td>
<td>Hand-over of compensation agreements</td>
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<td>17</td>
<td>Grievance reviews in regards to compensation agreements</td>
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<td>18</td>
<td>Final identification of vulnerable people</td>
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<td>19</td>
<td>Establishment of final instrument file</td>
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<td>Site allocation to GAL by Government authorities [Policy]</td>
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<td>22</td>
<td>Declaration of site and “Plan de masse” by Service Habitation Bokk</td>
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<td>23</td>
<td>Preparation of briefing documents (earthmoving and access)</td>
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<td>Preparation of briefing documents for house construction</td>
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<td>25</td>
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<td>General earthmoving and access</td>
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<td>Consolidation on site layout, house design and public facilities</td>
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<td>Monitoring of construction by Resettlement Committee</td>
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<td>Grievance management</td>
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<td>Residents move - 1st wave</td>
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<td>Residents move - 3rd wave</td>
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16. Monitoring and Evaluation

Evaluation and monitoring are key components of Resettlement Action Plans and are integral to meeting the Project’s responsibilities and obligations. The monitoring and evaluation process examines what worked with the resettlement process and why; what did not work and what adjustments need to be made.

Monitoring and evaluation includes the following primary components:

a. **Internal Monitoring**: Looks mainly at progress against inputs and commitments of resettlement and compensation and at specific situations relating to grievances and economic or social problems arising from the implementation of the compensation and resettlement process.

b. **External Monitoring**: Looks mainly at compliance of the resettlement program with applicable policies and company commitments.

c. **Completion Audit**: Ultimately checks whether the primary commitments made in the RAP have been met, particularly with respect to long term restoration of livelihoods and standards of living.

### 16.1. INTERNAL MONITORING

Monitoring in the context of a Resettlement Action Plan is the ongoing, methodical data gathering and analysis of resettlement mitigation and development activities which provides the project with early and on-going indicators of progress and goal achievement. This early, ongoing monitoring process allows the Project to design additional or alternative mitigation measures if resettlement commitments or goals are not being met. Key documents for the monitoring process are:
a. The social baseline (SEIA and/or RAP);
b. The relevant Resettlement Action Plan;
c. This Resettlement Framework;
d. Internal process and procedural documentation including compensation records, grievance records, commitment register, land replacement records etc.

Monitoring will normally continue throughout the life of the project, even after the period of intensive resettlement activity.

16.1.1. Monitoring Process

The monitoring process will include two primary activities:
a. Quarterly monitoring reports on key resettlement inputs (essentially quantitative);
b. A household survey with a valid sampling of project impacted households and individuals (around 20%). The frequency of the household survey is defined in the RAP (it may be biannual – every two years – or annual).

The project will maintain records on all aspects to be monitored, including grievances, compensation, land acquisition and replacement, resettlement construction etc. and the data checked against RAP commitments.

The RAP Unit will conduct an annual or bi-annual household survey to identify changes to the baseline data and to assess whether the project outputs (short term results) are as projected. The survey should be based on the original household survey conducted as part of the RAP census and baseline. The monitoring team will specify the survey plan and sampling framework, resources and responsibilities for the monitoring exercise. A minimum sample of 20% of the total number of affected households should be surveyed.

Both the quarterly and the annual monitoring exercises will result in a summary report documenting progress made towards RAP commitments and changes against the baseline. The report will also document measures planned and/or taken to address program shortfalls as well as summarizing grievances and actions taken. The RAP Unit will present the findings to the HSEC Director, the Project Director and to the Resettlement Committee (which includes local government authorities). The finalized reports will be made available to lending institutions and to the independent evaluators.

16.1.2. Monitoring Reporting

The results from the quarterly monitoring process will be summarized into a 3 – 8 page report which will include results from key indicators and a comparison from previous results and will recommend changes or corrective actions to mitigation plans if gaps are identified. The results from the quarterly and annual monitoring process will be reported to internal stakeholders and will be presented to the RAP committee to lenders and to external consultants.
16.2.  EXTERNAL COMPLIANCE MONITORING

16.2.1. Monitoring by the Government of Guinea

As part of its own actions of general monitoring of GAC’s activities with relation to its concession, Base Agreement and other formal undertakings (SEIA, SEMP, etc.), the Government has two main instruments for monitoring resettlement and compensation undertakings.

a. The Prefectural Resettlement and Compensation Committee
b. Specific missions of high level Conakry-based officials to check on resettlement implementation and discuss issues with both local level Government representatives and Company representatives.

16.2.2. External Monitoring

The implementation of RAPs will be audited by an external monitor (resettlement specialist) on an annual basis until a successful completion audit is conducted (see Section 11.4). Aspects that will be verified include:

a. General progress of resettlement activities
b. Compliance with IFC Performance Standards 1 and 5 and Operational Safeguards 2, particularly with regards:
c. Timely delivery of compensation entitlements (including cash compensations, resettlement packages, etc.)
d. Timely delivery of livelihood restoration measures
e. Grievance management
f. Progress on recommendations made by the external Consultant in previous missions
g. Review of implementation issues and of the efficacy of implementation organisations, both external (including mediation and resettlement committees) and internal to GAC.

16.3.  COMPLETION AUDIT

The Completion Audit has the objectives of determining whether the implementation of RAP activities has resulted in the desired outcomes including whether projected affected people’s livelihoods have been restored.

The following commitments and mitigation measures must have been accomplished before the Completion Audit can be implemented:

a. Compensation process completed,
b. Land has been replaced and improvement programs in place,
c. Livelihood restoration complete (project-affected people are no worse off than before project impacts, except in cases where factors external to the project are shown to have rendered resettlement efforts ineffective),
d. Housing construction and resettlement complete,
e. Grievances related to resettlement closed (a limited number of exceptions may be acceptable).
A successful Completion Audit signals that the Project is in compliance with the RAP and other regulatory laws and guidelines.

**16.3.1. Completion Audit Reporting**

The Completion Audit produces a document outlining project compliance and any outstanding issues and recommended resolutions. The report is a public document translated in English and French and summarized in local language if deemed necessary.

**17. References and Contact**

**References**

RAP: Mining Infrastructure Component of the Project in Béli Kindy (2016).

**Contact**

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