

Document Number: 9120-S-CPD-00001 Rev 2

EGA-GAC CORPORATE PROCEDURE

LAND ACQUISITION, COMPENSATION & RESETTLEMENT FRAMEWORK

Revision:	Date revised:	Reason for revision:	Revised by:	Checked by:	Approved by:
2	6 April 2017	Lenders Review	Frederic Giovannetti	Tony Kneuker René Fontaine	Mohamed Talhaoui
1	5 June 2016	IFC Review	Leah Hibbin	Tony Kneuker René Fontaine	John Fulton
0	28 Sept 2015	Approved	Leah Hibbin	Tony Kneuker René Fontaine	John Fulton

This Land Access, Compensation, and Resettlement Framework was reviewed and approved by:

Paolo Castellari
Chief Executive Officer - Guinea Alumina Corporation.

This document represents the policy and procedures of GAC/EGA with regard to land acquisition compensation, and resettlement.

TABLE OF CONTENTS

ACRONYMS	V
GLOSSARY	VI
1. INTRODUCTION	1
1.1 PURPOSE AND SCOPE	1
1.2 PROJECT BACKGROUND AND IMPACTS	1
1.3 DESCRIPTION OF PROJECT COMPONENTS IN RELATION TO RESETTLEMENT	5
1.3.1 MINE	5
1.3.2 PORT	7
1.3.3 RAIL	7
1.4 RESETTLEMENT FRAMEWORK – OBJECTIVES	10
1.5 GAC'S RESETTLEMENT AND COMPENSATION ACTIVITIES – KEY OBJECTIVES	10
1.6 GENERAL PROCEDURES FOR DEVELOPING A RAP	11
2. LEGAL, REGULATORY AND INSTITUTIONAL FRAMEWORK	13
2.1 OVERALL PROJECT LEGAL FRAMEWORK	13
2.2 BASIC AGREEMENT	13
2.3 APPLICABLE LAWS OF THE REPUBLIC OF GUINEA	14
2.3.1 CONSTITUTION, 2010	14
2.3.2 THE LAND RIGHT AND DOMANIAL CODE, 1992 - SCOPE AND PRINCIPLES	14
2.3.3 THE MINING CODE, 2013 - SCOPE AND PRINCIPLES	16
2.3.4 URBAN CODE, 2000	16
2.4 LAND ACQUISITION PROCEDURE	16
2.5 INSTITUTIONAL FRAMEWORK	19
2.5.1 LEGISLATION	19
2.5.2 GOVERNMENT SUPPORT AND INVOLVEMENT	19
2.5.3 TRADITIONAL AUTHORITY AND CUSTOMARY LAND TENURE	19
2.5.4 CIVIL SOCIETY AND NGO INSTITUTIONAL CAPACITY	21
2.5.5 INTERNATIONAL REQUIREMENTS	21
2.5.6 GUINEAN LAW, IFC AND AFDB REQUIREMENTS	23
2.6 ORGANISATIONAL ARRANGEMENTS, ROLES AND RESPONSIBILITIES	35
2.6.1 OVERVIEW	35
2.6.2 INTERNAL GAC ROLES AND RESPONSIBILITIES	35
2.6.3 GAC'S ORGANISATIONAL STRUCTURE IN RELATION TO RESETTLEMENT	38
3. LAND ACCESS AND RESETTLEMENT PROCESS	40
3.1 GAC'S GOVERNING PRINCIPLES FOR RESETTLEMENT AND COMPENSATION	40
3.2 KEY DEFINITIONS AND PRINCIPLES	41
3.2.1 CATEGORISATION OF DISPLACED PEOPLE	41
3.2.2 INTERDICTION ZONES, RESTRICTION ZONES AND CUT-OFF-DATES	41
3.3 OVERVIEW OF THE RESETTLEMENT PROCESS	42
3.4 RAP SURVEY PROCESS	46
3.4.1 PRE-CENSUS	46
3.4.2 CENSUS AND INVENTORY OF AFFECTED AREAS	47
3.4.3 HOUSEHOLD SOCIO-ECONOMIC SURVEY	48
3.4.4 VERIFICATION OF STATUS	48
3.4.5 ESTABLISHMENT OF DATABASE	48

4.	CONSULTATION AND STAKEHOLDER ENGAGEMENT.....	50
4.1	GAC'S STAKEHOLDER ENGAGEMENT PRINCIPLES	50
4.2	KEY AREAS WHERE INFORMATION AND FEEDBACK ARE REQUIRED	50
4.3	STAKEHOLDER IDENTIFICATION	50
4.4	KEY CONSULTATION AVENUES	51
4.4.1	RESETTLEMENT COMMITTEES	51
4.4.2	HOST COMMUNITY COMMITTEES	51
4.5	PROCEDURES FOR ESTABLISHING CONSULTATION COMMITTEES	52
4.6	DOCUMENTATION AND REPORTING FOR STAKEHOLDER ENGAGEMENT	54
5.	GRIEVANCE MANAGEMENT.....	55
5.1	COMMUNITY GRIEVANCE POLICY	55
5.2	COMMUNITY GRIEVANCE MANAGEMENT – KEY PRINCIPLES	55
5.3	COMPLAINTS NOT COVERED BY THE COMMUNITY GRIEVANCE POLICY	56
5.4	STAGES IN THE COMMUNITY COMPLAINTS PROCESS	56
6.	COMPENSATION AND ENTITLEMENTS.....	58
6.1	KEY PRINCIPLES	58
6.1.1	GENERAL PRINCIPLES	58
6.1.2	ELIGIBILITY PRINCIPLES	58
6.1.3	GENERAL STRUCTURE AND PRINCIPLES OF COMPENSATION	58
6.2	ENTITLEMENTS	59
6.3	DESCRIPTION OF COMPENSATION ENTITLEMENTS	67
6.3.1	COMMUNITY COMPENSATION	67
6.3.2	AGRICULTURAL LAND	67
6.3.3	CROPS	67
6.3.4	RESIDENTIAL STRUCTURES	68
6.3.5	NON-RESIDENTIAL STRUCTURES	70
6.3.6	PUBLIC /COMMUNITY BUILDINGS	70
6.3.7	BUSINESSES	70
6.4	CEMETERIES AND OTHER CULTURAL RESOURCES	70
6.5	MOVING AND RESETTLEMENT TRANSITION ALLOWANCES AND ASSISTANCE	70
6.6	FISHING AND ASSOCIATED LIVELIHOODS	71
6.7	PAYMENT PROCEDURE	71
6.7.1	COMPENSATION PAYMENTS – KEY PRINCIPLES	71
6.7.2	COMPENSATION RATES	72
6.7.3	COMPENSATION AGREEMENT	72
7.	LIVELIHOOD RESTORATION.....	73
7.1	OVERVIEW	73
7.2	LAND BASED LIVELIHOODS	73
7.3	FISHING BASED LIVELIHOODS	73
7.4	EMPLOYMENT	74
7.5	SUPPORT TO SMALL BUSINESS ESTABLISHMENT AND DEVELOPMENT	74
7.6	SCHOLARSHIPS AND SKILLS DEVELOPMENT	74
8.	RESETTLEMENT SITE DEVELOPMENT.....	75
8.1	GENERAL	75
8.2	ROADS AND STREETS	75
8.3	UTILITIES AND WASTE MANAGEMENT	75
8.3.1	WATER	75

8.3.2	ELECTRICITY	76
8.3.3	WASTE MANAGEMENT	76
8.4	PUBLIC BUILDINGS	76
8.4.1	SCHOOLS AND HEALTH FACILITIES	76
8.4.2	CHURCHES, MOSQUES AND OTHER PUBLIC BUILDINGS	77
8.5	SECURITY OF TENURE	77
9.	IDENTIFICATION AND SUPPORT TO VULNERABLE HOUSEHOLDS	78
9.1	IDENTIFICATION OF VULNERABLE HOUSEHOLDS	78
9.2	POTENTIAL ASSISTANCE ACTIVITIES TO VULNERABLE HOUSEHOLDS	78
9.3	MONITORING OF VULNERABLE HOUSEHOLDS	78
9.4	SUMMARY OF PROCEDURES FOR ADDRESSING THE NEEDS OF VULNERABLE HOUSEHOLDS	79
10.	GENDER ISSUES.....	80
10.1	PRINCIPLES	80
10.2	GENDER EQUITY PROCEDURES	80
11.	MONITORING AND EVALUATION.....	82
11.1	OVERVIEW OF THE MONITORING FRAMEWORK	82
11.2	INTERNAL MONITORING	82
11.2.1	OVERVIEW	82
11.2.2	MONITORING PROCESS	82
11.2.3	OBJECTIVES AND ASPECTS MONITORED	83
11.2.4	MONITORING INDICATORS	84
11.2.5	MONITORING REPORTING	84
11.3	EXTERNAL COMPLIANCE MONITORING	91
11.3.1	MONITORING BY THE GOVERNMENT OF GUINEA	91
11.3.2	EXTERNAL MONITORING	91
11.4	COMPLETION AUDIT	92
11.4.1	OBJECTIVES AND SCOPE	92
11.4.2	COMPLETION AUDIT INDICATORS	92
11.4.3	COMPLETION AUDIT REPORTING	92
Appendix 1.	LIST OF CIVIL SOCIETY ORGANISATIONS AND NGOS	93

TABLES

Table 1.1:	Phases of a RAP Development	11
Table 1.2:	Elements to be included in a Resettlement Action Plan	12
Table 2.1:	Comparison of Guinean Law with IFC's and AfDB's Requirements Regarding Compensation	25
Table 2.2:	Comparison of Guinean Law with IFC's AfDB's Requirements Consultation Documentation and Other	30
Table 5.1:	Principal Steps of Grievance Management Process	56
Table 6.1:	Eligibility and Entitlement Matrix	61
Table 9.1:	Activities to Address the Needs of Vulnerable People	79
Table 11.1:	Indicators of Resettlement and Compensation Effects	85
Table 11.2:	Indicators of Socio-Economic Changes	89

FIGURES

Figure 1.1:	GAC's Concession and Zone(s) of Operations	2
Figure 1.2:	Settlements located in the GAC Concession (Southern Area Only)	3
Figure 1.3:	Overview of Kamsar Area of Influence	4
Figure 1.4:	Major Physical Impacts Likely to Affect Settlements in the Mine Area	6
Figure 1.5:	Survey Area Dapress	9
Figure 2.1:	Main Steps of the Expropriation Process According to the Land Code of Guinea	18
Figure 2.2:	GAC Organisation and Reporting Structure	39
Figure 4.1:	Consultation Committees Process	53
Figure 5.1:	Community Complaints Procedure Poster for Community Use	57

ACRONYMS

AfDB	African Development Bank
CBG	Compagnie de Bauxites de Guinée
COBAD	Compagnie de Bauxite et d'Alumine de Dian Dian
CGMS	Community Grievance Management System
CLO	Community Liaison Officer
ESIA	Environmental and Social Impact Assessment
FG	<i>Franc Guinéen</i> (Guinean Franc)
GAC	Guinea Alumina Corporation
GIS	Geographic Information System
HSSEC	Health, Safety, Security, Environment Community (Department of GAC)
IFC	International Finance Corporation
IFC PSs	International Finance Corporation Performance Standards
ISS	Integrated Safeguards System
LACR	Land Acquisition, Compensation and Resettlement
LACRF	Land Acquisition, Compensation and Resettlement Framework
NGO	Non-Governmental Organization
OS	Operational Safeguards
PAP	Project-Affected Person
PAH	Project-Affected Household
PS	Performance Standard
PV	<i>Procès Verbal</i> (minutes)
RAP	Resettlement Action Plan
RUSAL	United Company RUSAL (Russian Aluminium)
USD	United States Dollar

GLOSSARY

Term	Definition and comments
Adequate housing	Adequate housing or shelter can be measured by quality, safety, affordability, replicability, habitability, cultural appropriateness, accessibility, and locational characteristics. Adequate housing should allow access to employment options, markets, and basic infrastructure and services, such as water, electricity, sanitation, health-care, and education. PS 5 requires that adequate housing and security of tenure be afforded to displaced persons at resettlement sites.
Allowance	Cash paid in respect of losses or resettlement related expenses other than losses of immovable assets. For example, tenants can be provided with a cash “allowance” to support their effort to secure alternative housing. A moving “allowance” can be paid to people who have to relocate as a result of Project land access. An “allowance” should be distinguished from compensation, which is meant to indemnify the loss of an immovable asset.
Compensation	Payment in cash or in kind for loss of an immovable asset or a resource that is acquired or affected by the project. This is typically understood to include all forms of compensation, including the provision of replacement land and housing, also sometimes referred to as “resettlement” <i>stricto sensu</i> .
Completion Audit	A Completion Audit has the objectives of determining whether the primary commitments made in the RAP have been met, particularly with respect to long term restoration of livelihoods and standards of living. A successful Completion Audit signals that the Project is in compliance with the RAP and other regulatory laws and guidelines.
Cut Off Date	The date of completion of the census and assets inventory of persons affected by the project. Persons establishing occupation of the project area after the cut-off date are not eligible for compensation and/or resettlement assistance. Similarly, fixed assets (such as built structures, crops, fruit trees, and woodlots) established after the date of completion of the assets inventory, or an alternative mutually agreed on date, will not be compensated.
Déclaration d'Utilité Publique (DUP) – Declaration of Public Interest	<p>Articles 54 to 75, of the Land Code contain detailed provisions related to expropriation of land for public interest. A Déclaration d'Utilité Publique (DUP) is a legal process whereby the State declares the intention to expropriate land in public interest.</p> <p>A Ministerial Order (“arrêté ministériel”) details the applicable procedure: time period for the Public Enquiry (usually one month), the official in charge (“commissaire-enquêteur”), as well as places where meetings are organized, where documentation is available, and places where the Public Enquiry register is available.</p> <p>Consultation with the interested public takes place, usually in Préfectures, Sub-Préfectures and Town Halls, and if needed in interested rural villages; this consultation includes a Project presentation, a tentative presentation of its potential impacts, and rounds of questions & answers.</p> <p>Once the Public Enquiry period is closed, the “commissaire-enquêteur” prepares a report for the attention of the Minister, taking consideration of observations made by the public in the registers and during the public meetings.</p> <p>The Project sponsor takes part in the organization of the Public Enquiry and bears its cost.</p>

Term	Definition and comments
Economic displacement	Loss of assets (including land) or access to assets that leads to loss of income sources or means of livelihood as a result of project-related land acquisition or restriction of access to natural resources. People or enterprises may be economically displaced with or without experiencing physical displacement. Usually the term “economic displacement“ is used when affected people are not also physically displaced (see below “physical displacement”).
Household	One person or a group of persons who share a dwelling unit and share at least one meal a day. A dwelling unit is a house, an apartment, a mobile home, a group of rooms, or a single room, in which the occupants live and eat separately from other persons in the building and which has direct access from the outside of the building or through a common hall. A household does not necessarily correspond to a family and may consist of a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living and cooking arrangements.
Informal right holder	<p>Person or group of persons recognised by custom, unwritten rules, or other socially accepted processes as holding certain ownership or usufruct rights over an asset or resource, although these usufruct rights are neither formalised in a legal document such as a title nor officially registered.</p> <p>Informal right holders include:</p> <ul style="list-style-type: none"> • Slum dwellers in urban settings, where neither landlords nor occupants have formal ownership or occupation rights; • Customary land holders in rural settings, where access to land derives from unwritten customary rights; • Customary usufruct rights over natural resources such as water bodies, grazing land, forest, that can be held at individual or group level. <p>As opposed to informal right holders:</p> <ul style="list-style-type: none"> • “Formal right holders” include those people with a formal title to land and/or other immoveables (typically a registered ownership deed); • “Squatters” include those people whose occupation is recognised neither by law nor by socially accepted processes, which may for example include opportunistic settlers that move into an area after it has been lawfully and broadly declared prohibited for settlement.
Involuntary resettlement	<i>Stricto sensu</i> , “resettlement” refers to a form of compensation whereby affected people are offered replacement housing and “resettle” to that housing. The IFC PS5 defines resettlement as involuntary “when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement”. However, “involuntary resettlement” has taken a broader signification and is used as an overarching term covering both impacts (“involuntary resettlement impacts”) and compensation measures associated to land acquisition and/or restricted access.
Land acquisition / Land access	In the sense of IFC’s PS5 and other similar international requirements, “land acquisition” is understood to include both full purchases of property and purchases of rights other than full property rights, such as rights-of way. In the last few years, specialists have often preferred to use “land access” rather than “land acquisition”, to cover not only actual purchases but also other forms of access to land, such as temporary occupation or acquisition of rights other than full property rights (rights of way or certain usufruct rights).
Land Commission	The Land Commission defined by the Land Code is required to be in place in each of the Prefectures. As per the Code, its primary purpose is to act as the negotiating body in the expropriation procedure.
Livelihood	A livelihood comprises the capabilities, assets (including both material and social resources) and activities required for a means of living. A livelihood is sustainable when it can cope with and recover from stress and shocks and maintain or enhance its capabilities and assets both now and in the future, while not undermining the natural resource base. (Chambers & Conway, 1991, quoted by UNDP – Guidance Note on Livelihoods, 2010).

Term	Definition and comments
Livelihood restoration	Specific allowances or activities intended to support and provide “opportunities for displaced people to improve or at least restore their means of income-earning capacity, production levels and standards of living” (IFC PS5). Livelihood restoration measures typically include a combination of cash or other allowances and support activities such as training, agricultural assistance or business enhancement. Where pre-project livelihoods are predominantly land based, land-based livelihood restoration measures are prioritized. Livelihood restoration should be distinguished from compensation.
Physical displacement	Loss of dwelling or shelter as a result of project-related land access, which requires the affected person(s) to move to another location. Physical displacement typically entails economic displacement too, as physically displaced people usually lose access to land, employment, or business opportunities associated to their former location, and most specialists use “physical displacement” to cover both physical and economic impacts.
Project Affected Households	All members of a household, whether related or not, operating as a single economic unit, who are affected by a project, either physically, economically or both.
Project Affected Person (PAP)	The IFC defines a PAP as “any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Replacement value	<p>This is usually calculated as the market value of the asset plus transaction costs (e.g. taxes, stamp duties, legal and notarization fees, registration fees, travel costs and any other such costs as may be incurred as a result of the transaction or transfer of property). In applying this method of valuation, depreciation of structures and assets should not be taken into account. With regard to land and structures, replacement costs are defined as follows:</p> <ul style="list-style-type: none"> • Agricultural land—the market value of land of equal productive use or potential located in the vicinity of the affected land, plus the cost of preparation to levels similar to or better than those of the affected land, and transaction costs such as registration and transfer taxes. • Land in urban areas—the market value of land of equivalent area and use, with similar or improved infrastructure and services preferably located in the vicinity of the affected land, plus transaction costs such as registration and transfer taxes. • Houses and other structures—the cost of purchasing or building a new structure, with an area and quality similar to or better than those of the affected structure, or of repairing a partially affected structure, including labour and contractors’ fees and transaction costs such as registration and transfer taxes.
Secondary displacement	Situations where the development of a resettlement site requires the displacement of people occupying it prior to the development. Secondary displacement is usually handled by providing secondary resettled individuals with the same benefits as those granted to primary resettled individuals (i.e. a developed plot and resettlement house, and associated compensation and allowances).
Security of tenure	A resettlement site offers security of tenure if it protects, to the greatest extent possible, the resettled persons from forced evictions.
Transition period	Period between the occurrence of the displacement and the time when affected livelihoods are restored. Depending on the compensation package and the type of impacts, specific allowances or assistance may be required to help affected people through the transition period. Experience shows that this has to be handled with some caution as transition period assistance may create dependency in the displaced community and an exit strategy will need to be devised upfront.

Term	Definition and comments
Vulnerable groups	Vulnerable or “at-risk” groups includes people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits. Vulnerable groups in the context of displacement also include people living below the poverty line, the landless, the elderly, women- and children-headed households, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national land compensation or land titling legislation.

1. INTRODUCTION

1.1 PURPOSE AND SCOPE

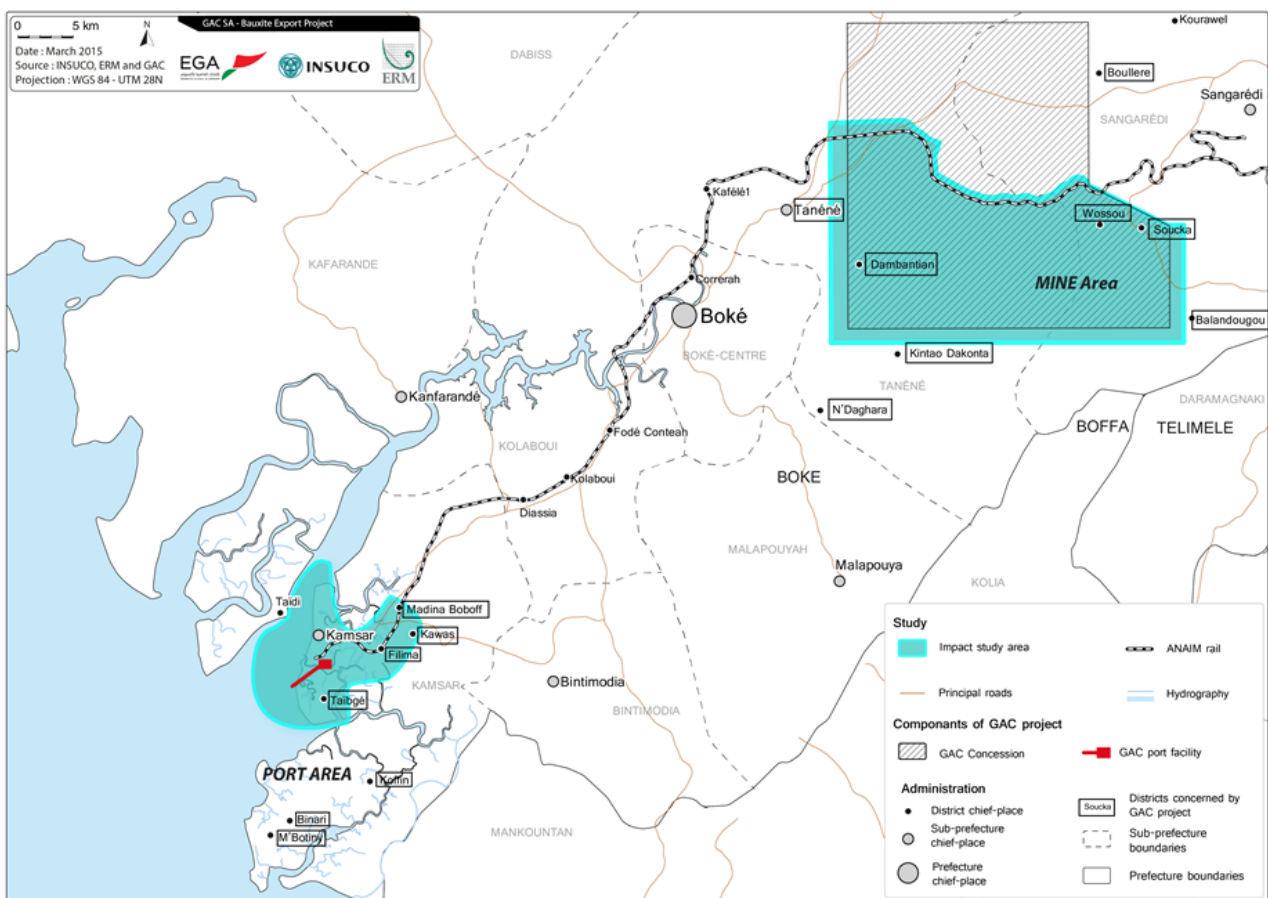
1. The GAC Land Acquisition, Compensation and Resettlement Framework (LACRF) sets out the principles, procedures, entitlements, eligibility criteria and organizational arrangements that govern GAC's compensation for impacts to land and other immovable assets (including economic displacement and loss of / restricted access to common/customary resources) during project development, operation and closure. The principles and procedures outlined in this document apply to all land acquired or otherwise affected by GAC or by its contractors and subcontractors, whether permanently or temporarily and whether directly or indirectly. The LACRF covers both physical displacement (where people have to be relocated) and economic displacement (where people's livelihoods are affected without them having to move).
2. As the GAC concession will be developed in successive phases over the next 20 years, this LACRF provides a framework for the further development of phase specific Resettlement Action Plans (RAPs).
3. For each phase of the mine plan, individual RAPs will be developed detailing:
 - a. The baseline information of affected populations;
 - b. Details of affected assets and livelihoods;
 - c. Compensation entitlements, detailing generic measures presented in this LACRF;
 - d. Budgets;
 - e. Implementation schedules; and
 - f. Any other specific considerations and context relating to each specific RAP.
4. This LACRF will be reviewed and updated on a regular basis over the lifetime of the Project, to ensure that the processes, policies and mechanisms outlined in this document, relating to Land Acquisition, Compensation (including livelihood restoration) and Resettlement (LACR) activities, remain appropriate to the context and conditions on the GAC concession and zones of operation as well as international standards of best practice.

1.2 PROJECT BACKGROUND AND IMPACTS

5. GAC is the holder of a 50-plus year mining concession for Lease 149 in the Préfecture of Boké, in north-western Guinea. The Project was initiated in 2001 when Global Alumina, previously a Canadian publicly-traded junior mining company, obtained the lease from the Government of Guinea to mine bauxite resources and to build and operate an alumina refinery, along with relevant infrastructure.
6. 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.
7. 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.
8. The scope of the Bauxite Export Project ("the Project") includes:

- a. the development of the bauxite mine with an anticipated life of at least 20 years, with potential for further expansion;
- b. the construction of railway spurs to join the mining site in the Tinguilinta area to the existing ANAIM¹ railway (operated by CBG), and the construction of another rail spur in Kamsar to connect the main railway to the GAC port terminal;
- c. the construction of the GAC port terminal, on an existing fill platform at GAC’s port concession in Kamsar;
- d. the development of offshore loading infrastructure, together with dredging works, to enable export of bauxite via Capesize or Newcastlemax vessels. These facilities may support also the export of a part of the bauxite mined by the CBG company ; and
- e. the development of supporting infrastructure for the mining, rail, port terminal and marine operations.

Figure 1.1: GAC's Concession and Zone(s) of Operations



(1) Agence Nationale des Aménagements et Infrastructures Miniers

Figure 1.3: Overview of Kamsar Area of Influence

Source: ERM/INSUCO

Note: this is a social 'area of influence' as defined in the SEIA, which is much broader than the Project footprint.



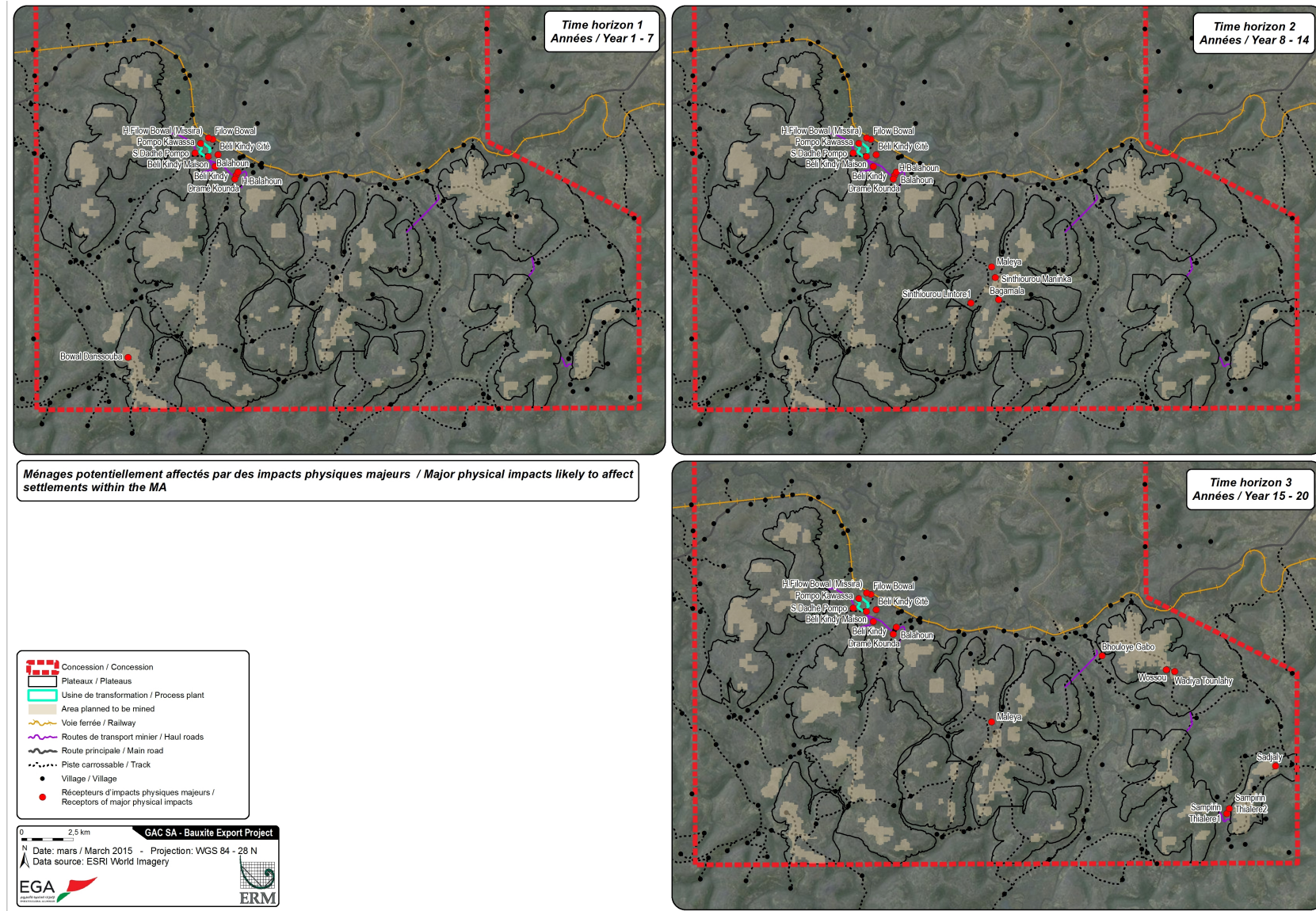
1.3 DESCRIPTION OF PROJECT COMPONENTS IN RELATION TO RESETTLEMENT

1.3.1 Mine

9. The Mine Area consists of:
 - a. Greenfield bauxite mining activities in the southern part of the GAC concession, with capacity to produce up to 17 million tons per annum (Mtpa) of high grade bauxite (dry);
 - b. A bauxite ore crushing plant, stockyards and rail loading facility, to be located adjacent to the bauxite mine, within the concession area; and
 - c. A reservoir on the north of the concession to augment water reserves for mining activities during the dry season.
10. The mine area is essentially rural and is located across the Rural Communes (RC) (which corresponds to two Sub-Prefectures) of Sangarédi and Tanéné, physically and administratively separated by the river Tinguilinta. Both are connected to Boké Prefecture (Administrative Region of Boké). The mine area contains a total of 155 settlements as well as camps of cattle herders with a total population estimated at 17,786 inhabitants in 2,610 households²
11. The total estimated surface area of the southern concession, where the majority of mine operations will be concentrated, is 394 km² and includes 10, exploitable bauxite plateaus as well as significant agricultural and pastoral land. Resettlement activities will address both physical and economic displacement (both of which are likely to be significant over a 20 year timespan) (Figure 1.4) . Given the high dependence on agriculture and other land-based livelihoods on the concession, GAC aims to minimize negative impacts on communities and livelihoods by consulting with the local populations and planning and locating haul roads and other mining infrastructure in areas where impacts can be minimized or mitigated. GAC's mining plan is phased over 20 years and resettlement will be planned in phases and in concert with land rehabilitation and agricultural improvement programs (conducted by the environment and community departments) to ensure that sufficient land is always available to support local livelihoods. Livelihood and compensation packages will prioritize land-based assistance and support.
12. The nature of mining concessions is that they attract a rapidly growing migrant population that places additional stress on natural resources and competes with the indigenous population for jobs. Part of GAC's focus is therefore on education, adult literacy and vocational training and local recruitment for low-skilled jobs, as well as prioritizing supply chain linkages, locally and regionally, to help stimulate the local economy and labor force.
13. The bauxite crushing plant, stockyards and rail loading facilities will require the resettlement (physical displacement) of 176 households, including approximately 1,500 people. In most cases, the households are also economically displaced. There is an additional 55 households that are only economically displaced (not physically). This will be covered in the Concession RAP 2016. The displacement is centred around the villages of Beli Kindy, Filo Bowal and Boundou Lengue
14. The reservoir will require the physical displacement of 7 structures in the village of Sinthiourou Tiouladi that have been identified as being at medium to high risk in the event of a dam failure. Economic displacement associated with the inundation area is the subject of a current SEIA. Compensation and livelihood restoration associated with this displacement will be handled through an addendum to the Concession RAP.

⁽²⁾ SEIA 2015

Figure 1.4: Major Physical Impacts Likely to Affect Settlements in the Mine Area



1.3.2 Port

15. The development of bauxite storage and export facilities at the GAC port concession in Kamsar. The "port area" includes the city of Kamsar, the settlements located in the Sub- Prefecture to the south of the urban areas and part of the estuary of the Rio Nuñez. This area takes account of the construction works of the mining terminal and the port, the dredging activities of the Rio Nuñez, the rail spur to the port terminal, and a housing complex for the Project's management staff (location still being defined) and the construction of living quarters for the workers (within the perimeter of the port terminal).
16. GAC started its field activities in 2002. While most of these early activities were related to design, permitting and financing, some construction work has been carried out in particularly in the Kamsar area. To enable this work, and subsequent to Environmental and Social Impact Assessment studies carried in 2004 and 2005, Global Alumina undertook a RAP in 2005 to acquire around 190 ha of land in Kamsar in line with national legal requirements as well as the Equator Principles.
17. A total of approximately 150 households were impacted physically and/or economically and were resettled and/or compensated accordingly. Livelihood restoration and monitoring and evaluation activities are still on-going for this RAP due to global economic conditions and a change of ownership, post 2008, which saw a significant slowdown in the project and in resettlement activities.
18. In February 2016, an audit the 2005 RAP was conducted. This report indicated that additional planning and implementation of livelihood restoration activities is required. This is currently under review and consideration by GAC to ensure that all outstanding compensation commitments are met and the 2005 RAP can be properly closed out.
19. Not all of the area designated for resettlement was acquired in the period from 2005 to 2008 and the resettlement of the remaining area of Daparrass was put on hold until 2016 (now called the 2016 Daparrass RAP).
20. The 2016 Daparrass RAP affects 4.5 hectares of urban land located on the Southern side of the existing CBG railway (see Figure 1.5). None of this land is titled and there are no known "*permis d'occuper*" (occupancy permit). Land is held informally by owners of structures, with a few agricultural plots.
21. The 2016 Daparrass RAP has been developed for the 248 households in line with IFC and AfDB standards and this LACRF and will be implemented in 2016/2017. A full RAP document has been prepared in line with the provisions and policies in this LACRF and will be disclosed to government and public.

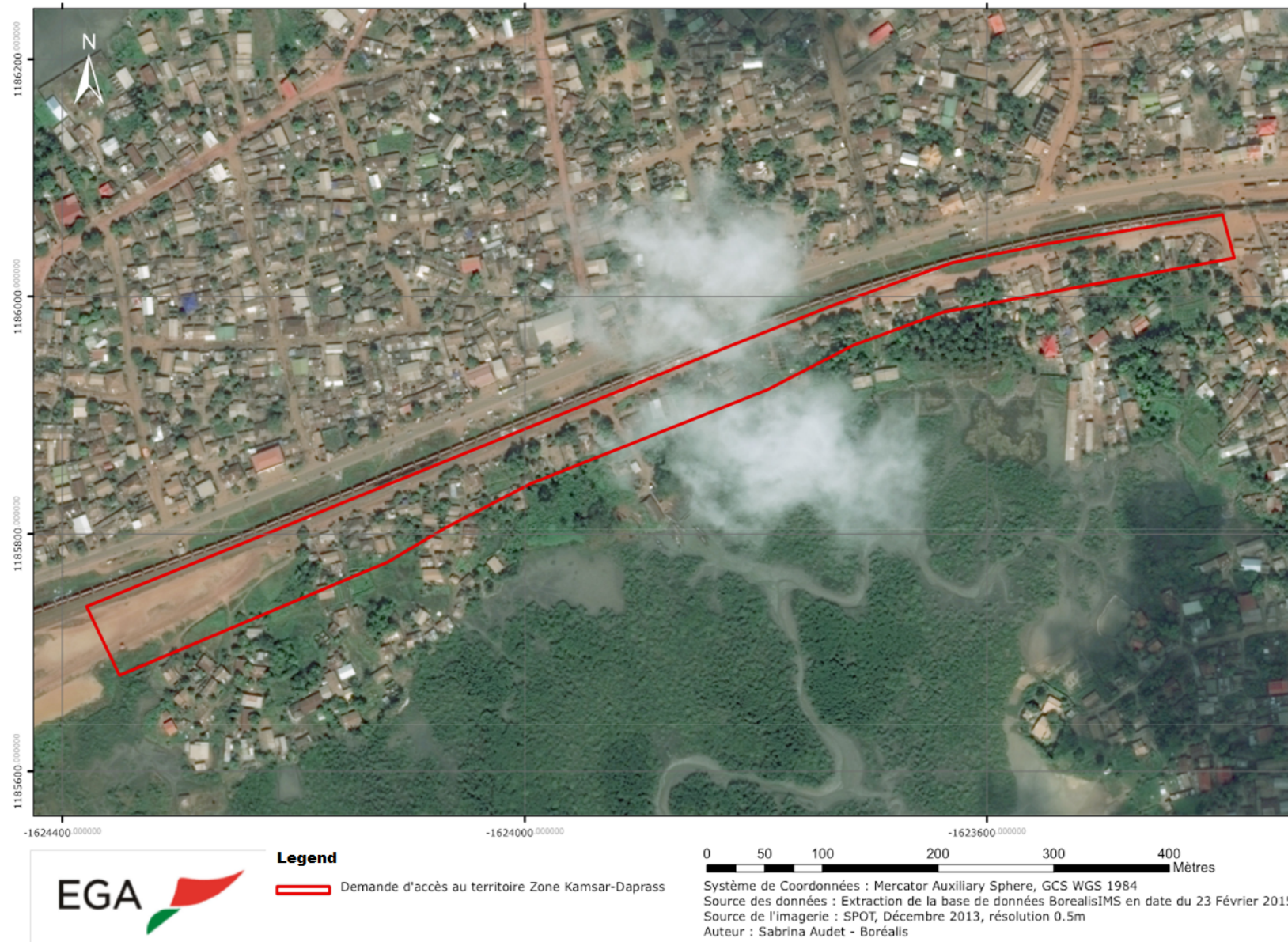
1.3.3 Rail

22. The rail component of the project consists of the following:
 - a. The development of two rail sidings connected to the existing Sangarédi to Kamsar rail line, at the mine and port locations to load and unload the ore; and
 - b. The expansion of the main rail line between Sangarédi and Kamsar as part of a multi-user agreement between GAC, CBG and Rusal COBAD.
23. The two rail sidings will impact households in the port area and on the concession respectively. They are part of the first phase RAPs being undertaken in Kamsar and the Mine Area (centred around the village of Beli Kindy) simultaneously during 2016/2017. Each RAP is developed as a separate document, in line with the policies and provisions of the LACRF, but also takes into account the individual context of each resettlement as well as the concerns and requirements of affected communities.
24. GAC is participating in the expansion of the main rail line between Kamsar and Sangarédi as part of this multi-rail user group. CBG is the concessionaire of the railway and will therefore be responsible

for all construction and resettlement activities along the 135 km rail track. Land-take will involve a 50 m – 75 m strip of land spanning the current rail line. The majority of impacts will involve economic rather than physical displacement although some structures along the rail path will be impacted and need to be physically resettled.

25. At this point in time the exact footprint of the main line rail expansion project is not known. The track will be doubled at strategic locations with 6 to 8 rail loops to enable train passing. As CBG has publically undertaken to implement IFC Performance standards and committed to doing the same in User Committee meetings, it is to be expected that any resettlement and/or compensation activities will be compliant with IFC and other international standards of best practice. Furthermore, the Technical Committee, constituted by ANAIM, CBG, Rusal and GAC and overseeing the railway expansion has mandated an environmental firm to conduct an environmental and social impact assessment to IFC and AfDB standards that is currently underway and should be completed in 2016
26. Although GAC is not directly involved in the rail expansion project it will seek to ensure that any resettlement and compensation activities undertaken by the Multi-User Technical Committee are in full compliance with IFC and AfBD standards and aligned with GAC's own Social and Environmental Plan. This will include: reviewing the RAP document to be developed for the Multi-users Technical Committee and participating in regular coordination meetings with CBG personnel relating to resettlement activities on GAC's concession. GAC will also conduct independent monitoring and evaluation to assess impacts over time on the communities within its concession area.

Figure 1.5: Survey Area Dapress



1.4 RESETTLEMENT FRAMEWORK – OBJECTIVES

27. In the development of the Project, GAC will seek to avoid impacts on communities, and where avoidance is not possible, minimise adverse social and economic impacts from land acquisition or restrictions on land use.
28. When avoidance is not possible, Land Acquisition, Compensation (including livelihood restoration) and Resettlement (LACR) in the GAC Project area is conducted in conformance with the IFC's Performance Standard 5, as well as with the African Development Bank Operational Safeguard 2, and seeks to ensure that individuals and communities whose land, immovable assets and other natural resources are affected by the Project, as well as other key stakeholders, are consulted and involved in the LACR processes and decisions which affect them, and that they are compensated fairly for any impacts which adversely affect their livelihoods or living conditions.
29. Project Affected Persons (PAPs) should have the opportunity, at a minimum, to restore, and preferably improve, their living standards to at least pre-resettlement conditions and to share in benefits deriving from the Project.
30. In keeping with this, this LACRF sets out the principles and policies to be employed for LACR activities during the lifetime of the Project, in order to avoid, minimize, mitigate or compensate Project impacts on populations and communities within its zones of operation relating to:
 - a. Physical displacement (loss of shelter);
 - b. Economic displacement (loss of livelihoods), including loss of areas used for agriculture and loss of business income;
 - c. Loss of 'common land' used for animal grazing and supplementing household income and /or household subsistence requirements (e.g. forest products such as wood for cooking, charcoal production and construction purposes; supplementary food products such as honey, fruit, and other edible plants, bush-meat etc.; medicinal plants and all other common natural resources.)
 - d. Loss of community assets or access to those assets (e.g. schools, health centres, and other structures used by/important to affected communities);
 - e. Socio-economic and socio-political changes entailed by LACR activities (for example, re-establishing access to education, social services and economic activities, changes to traditional authority structures or cultural practices etc.); and
 - f. Impacts to vulnerable persons.

1.5 GAC'S RESETTLEMENT AND COMPENSATION ACTIVITIES – KEY OBJECTIVES

31. In line with its commitments arising from the IFC Performance Standards, AfDB Integrated Safeguards System and Guinean law, the Project seeks to achieve the following objectives regarding land acquisition, land use, compensation and resettlement:
 - a. Avoid and/or minimize physical and economic displacement by exploring alternative project designs wherever feasible;
 - b. Mitigate and/or compensate adverse impacts from land acquisition or loss of access to land and other community resources;
 - c. Consult with and inform PAPs and other relevant stakeholders, in order to ensure that they are meaningfully engaged in the process and decisions that affect them; particularly in relation to LACR;

- d. Promote 'like-for like' replacement of immovable assets rather than cash compensation, particularly land replacement where livelihoods are primarily agricultural;
- e. Provide 'like-for like' replacement of assets at an equal (as a minimum) or (preferably) better standard;
- f. Where compensation for lost assets is paid in cash, its value will be calculated at full replacement value including all direct and indirect costs to affected people, such as transaction cost;
- g. Improve living conditions for physically displaced persons through the provision of adequate housing with security of tenure;
- h. Improve, or at a minimum restore, livelihoods and standards of living of affected persons;
- i. Pay particular attention to vulnerable groups and if necessary implement measures to ensure that they have equitable access to opportunities and benefits provided by the Project;
- j. Ensure gender equity in all compensation, allowances, resettlement, and livelihood restoration measures;
- k. Implement a robust grievance procedure ((including associated monitoring and reporting systems)for people to lodge complaints about the Project (including a means to make anonymous complaints if preferred) and to obtain a response from GAC management;
- l. Monitor the full implementation of the LACRF and its effectiveness over time; and
- m. Update and amend the LACRF on a regular basis to reflect any changes in Company policies, systems and mechanisms, as well as any significant changes in the context and conditions within GAC's zone(s) of operation.

1.6 GENERAL PROCEDURES FOR DEVELOPING A RAP

32. Each phase of Project development that identifies unavoidable economic and/or physical displacement impacts will be documented in a separate Resettlement Action Plan. In accordance with IFC Performance Standard 5 and AfDB Operational Safeguard 2, RAPs developed for each phase will include the following items:

Table 1.1: Phases of a RAP Development

RAP Elements	
1.	Identification of land-take requirements (mine plan, project planners and engineers)
2.	Identification potential impacts and magnitude of displacement (SEIA),
3.	Identification of resettlement footprint which avoids and/or minimises the physical and economic impacts on affected communities (Project planners/engineers/Community Department/ RAP Unit)
4.	Pre-census, census and asset inventory of affected population(s) in project footprint and Cut-off-Date set. Affected communities/households, local authorities (i.e. Préfet, Sous-Préfet, Mayors, Chef(s) de Secteur(s) traditional authorities etc.)
5.	RAP developed in consultation with affected communities. (including identification of potential resettlement sites). Consultation on-going throughout and post resettlement via resettlement committees.
6.	Resettlement site selection, site preparation and construction (housing, infrastructure and social services)
7.	Resettlement of affected communities (including targeted support for vulnerable households).
8.	Livelihood restoration activities (on-going 3 – 5 years)
9.	Monitoring and evaluation (on-going until final close-out of RAP).

10.	RAP Close-out
-----	---------------

Table 1.2: Elements to be included in a Resettlement Action Plan

RAP Elements	
1.	Description of the site and identification of site area
2.	Potential impacts
3.	Socio-economic baseline studies specific to the phase considered
4.	Specifics regarding eligibility and entitlements if any
5.	Phase specific compensation, resettlement and livelihood restoration measures if any
6.	Phase specific resettlement site selection, site preparation and relocation
7.	Phase specific housing, infrastructure and social services
8.	Phase specific aspects with respect to integration with host populations
9.	Phase specific aspects with respect to consultation and disclosure
10.	Phase specific aspects with respect to assistance to vulnerable people
11.	Implementation schedule
12.	Cost and budget
13.	Responsibilities
14.	Stakeholder mapping

33. Each phase-specific RAP will be approved by senior mine management and submitted to relevant Guinean authorities and international bodies as appropriate. The Bureau Guinéen des Etudes et Evaluations Environnementales (BGEEE) is responsible for the process of evaluation of the SEIA, public information and public hearings that include several relevant ministries and other organisations invited by the BGEEE.

2. LEGAL, REGULATORY AND INSTITUTIONAL FRAMEWORK

2.1 OVERALL PROJECT LEGAL FRAMEWORK

34. 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.
35. At the time the Base 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). If complying with these different standards affects the economic viability of the project, GAC needs to demonstrate such to the Government of Guinea and negotiate a mutually agreeable compromise.

2.2 BASIC AGREEMENT

36. The Basic Agreement, Amendment 2, for the production and export of bauxite and the development of an alumina refinery, was signed in November 2013 between the Government of Guinea and GAC. The Basic Agreement (2004) 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:
- a. 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";
 - b. 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...";
 - c. 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";
 - d. 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";
 - e. 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".
37. 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.
38. 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).

2.3 APPLICABLE LAWS OF THE REPUBLIC OF GUINEA

39. Key Guinean laws applicable to the Project with relevance to land tenure, expropriation and compensation, are as follows:
- a. The Constitution of the Republic of Guinea (May 2010),
 - b. The Land Rights and Domanial Code, March 1992, ("Land Code"),
 - c. The Mining Code, April 2013, ("Mining Code"), except that if complying with the conditions of the 2013 Mining Code affects the economic viability of the project, GAC needs to demonstrate such to the Government of Guinea and revert to the equivalent article of the 1995 Mining Code or negotiate a mutually agreeable compromise.
 - d. The Urban Code.
40. The following laws also contain some relevant provisions: The Civil Code, The Pastoral Code and its implementation decrees, The Forestry Code.

2.3.1 Constitution, 2010

41. In line with Article 17 of the Universal Declaration of Human Rights, as adopted and proclaimed by United Nations General Assembly resolution 217 A (III) of 10 December 1948, the Constitution of the Republic of Guinea states in Article 13³ that "The right to own property is guaranteed. Nobody can be deprived of property except where public interest has been lawfully established, and only subject to fair and prior compensation." This is further confirmed by the Civil Code (Article 534).

2.3.2 The Land Right and Domanial Code, 1992 - Scope and Principles

42. The Land Code encompasses the rules applying to both rural and urban land, and to both private and public land. Article 1 reiterates the right of private ownership stated by the Constitution. The Code generally focuses on registered property, with many of its provisions relevant to the processes and procedures for the establishment and registration of titles, leases, mortgages, encumbrances. The following two land registration procedures (Article 3) are defined:
- a. The Land Ownership Plan, a simple administrative document, not in itself a property title and held at the urban municipality or Rural Development Community level,
 - b. The Land Ownership Registration, held by the Land Ownership Conservation Department, and allowing for the issuance of a full ownership deed.

2.3.2.1 Recognition of Customary Land Rights

43. Although most of the Land Code provisions address formally titled property, Article 39 recognises customary rights. The Code defines the following as "owners": Those occupants, physical persons or legal entities, who demonstrate peaceful, personal, continuous and good faith occupation of a land or dwelling and in the manner of an owner. If required, good faith is established by all means, and

⁽³⁾ *Non-official English translation. French original text: « Le droit de propriété est garanti. Nul ne peut être exproprié si ce n'est dans l'intérêt légalement constaté de tous, et sous réserve d'une juste et préalable indemnité. »*

especially by the payment of property taxes arising from the said land or dwelling, by the development of the land or dwelling in conformance with local custom or by a public inquiry⁴.

44. According to this article, peasant farmers holding land according to customary rules are to be considered as “bona fide occupants who have developed their land in conformance with local custom”.

2.3.2.2 Expropriation

45. Under Articles 54 to 75, the Land Code contains detailed provisions related to expropriation for public interest.
46. In line with above-mentioned provisions of the Constitution, no expropriation can be implemented unless a first step is carried out, the Decree of Public Interest (“Décret d’Utilité Publique” or DUP). The DUP requires a public enquiry, organized as follows:
- a. A Ministerial Order (“arrêté ministériel”) details the applicable procedure: time period for the Public Enquiry (usually one month), official in charge (“commissaire-enquêteur”), places where meetings are organized and where documentation is available, places where the Public Enquiry register is available;
 - b. Consultation with the interested public takes place, usually in Préfectures, Sous-Préfectures and Town Halls, and if needed in interested rural villages; this consultation includes a Project presentation, a tentative presentation of its potential impacts, and rounds of questions & answers;
 - c. Once the Public Enquiry period is closed, the “commissaire-enquêteur” prepares a report for the attention of the Minister, taking consideration of observations made by the public in the registers and during the public meetings;
 - d. The Project sponsor is supposed to take part in the organization of the Public Enquiry and bears its cost.
 - e. Once the Decree of Public Interest is passed, the expropriation process must be completed in less than 3 years. Between the notification of expropriation to affected owners and the notification of the proposed compensation amount, less than 5 months should elapse. Another important step in the expropriation process is the “enquête parcellaire” or cadastral enquiry. Its objective is to identify all land plots and all interests therein, including both ownership and occupation interests. The “enquête parcellaire” is based on a ministerial order delineating the area potentially subject to expropriation (“arrêté de cessibilité”).
 - f. If the law was applied strictly, only formal occupation rights would be inventoried (titled ownership, or tenancy sanctioned by a written tenancy contract) during the “enquête parcellaire”. However, given the predominance of non-formalized occupation, usual practice is to register non formally sanctioned interests in land and structures as well.
 - g. In the event of expropriation, the right of appeal to Court is guaranteed under the legislation.

⁽⁴⁾ *Non-official English translation. French original text: « Sont propriétaires au sens du présent code: ..., les occupants, personnes physiques ou morales, justifiant d’une occupation paisible, personnelle, continue et de bonne foi d’un immeuble à titre de propriétaire. S’il y a lieu, la preuve de la bonne foi est apportée par tous moyens et notamment par le paiement des taxes foncières afférentes au dit immeuble, par la mise en valeur de l’immeuble conformément aux usages locaux ou par une enquête publique et contradictoire. »*

2.3.3 The Mining Code, 2013 - Scope and Principles

47. The Mining Code establishes the framework for all mining activities in Guinea, including investigations, operations, trade and transformation. The Code states that mining title holders can occupy the land needed to carry on their activities within the perimeter of their title. They need, however, to compensate legitimate land owners for their resulting loss of use. Compensations are due to owners, usufruct beneficiaries and land occupants for any damage caused by the activities.
48. The Mining Code also requires that the mine owner, as well as related businesses associated with the mine, must preferentially employ Guinean labour and allow them prioritized access to all jobs within their ability. Mine operators must also provide training programs to employees with an aim to progressively replace the expatriate staff with Guinean staff.
49. Articles 123 to 127 and 142 of the Mining Code are relevant to land, resettlement and compensation issues. The following principles are stated:
- a. Rights of landowners, tenants, and occupants of the land are confirmed: "the mining law does not supersede property rights (...). The rights of owners, tenants, and occupants of the land as well as their beneficiaries are not affected by the issuance of mining rights" (Article 123).
 - b. Where property rights or land use are disturbed, compensation is due to all "legitimate occupants". Such compensation must be in an amount "reasonable enough not to jeopardize the viability of the project and commensurate to the disturbance caused by mining operations" (Article 124). The implementation of this article is to be defined in additional decrees that would detail "the amount, frequency and means of payment".
 - c. The affirmation of the possibility for the Guinean State to expropriate for "public interest" in exchange for a compensation which cannot be less than what was provided by the previous occupation. The State can also impose that landowners "let construction work be undertaken on their property without obstruction", an "adequate compensation" similar to expropriation is then mandatory (Article 125).
 - d. The affirmation of a principle of compensation for all damage caused "to owners, tenants, and legitimate occupants of the land" by the payment of compensation under section 124, i.e. for any disturbance (Article 126).
 - e. The resettlement plan for the population victim of forced displacement caused by mining operations must, in addition to the infrastructural aspect, include a compensation for loss of income and livelihood as a result of displacement (Article 142).
50. Under the Mining Code, a licensed mining operation gains only temporary occupation rights. After closure, land rights return to pre-mining occupants or owners.

2.3.4 Urban Code, 2000

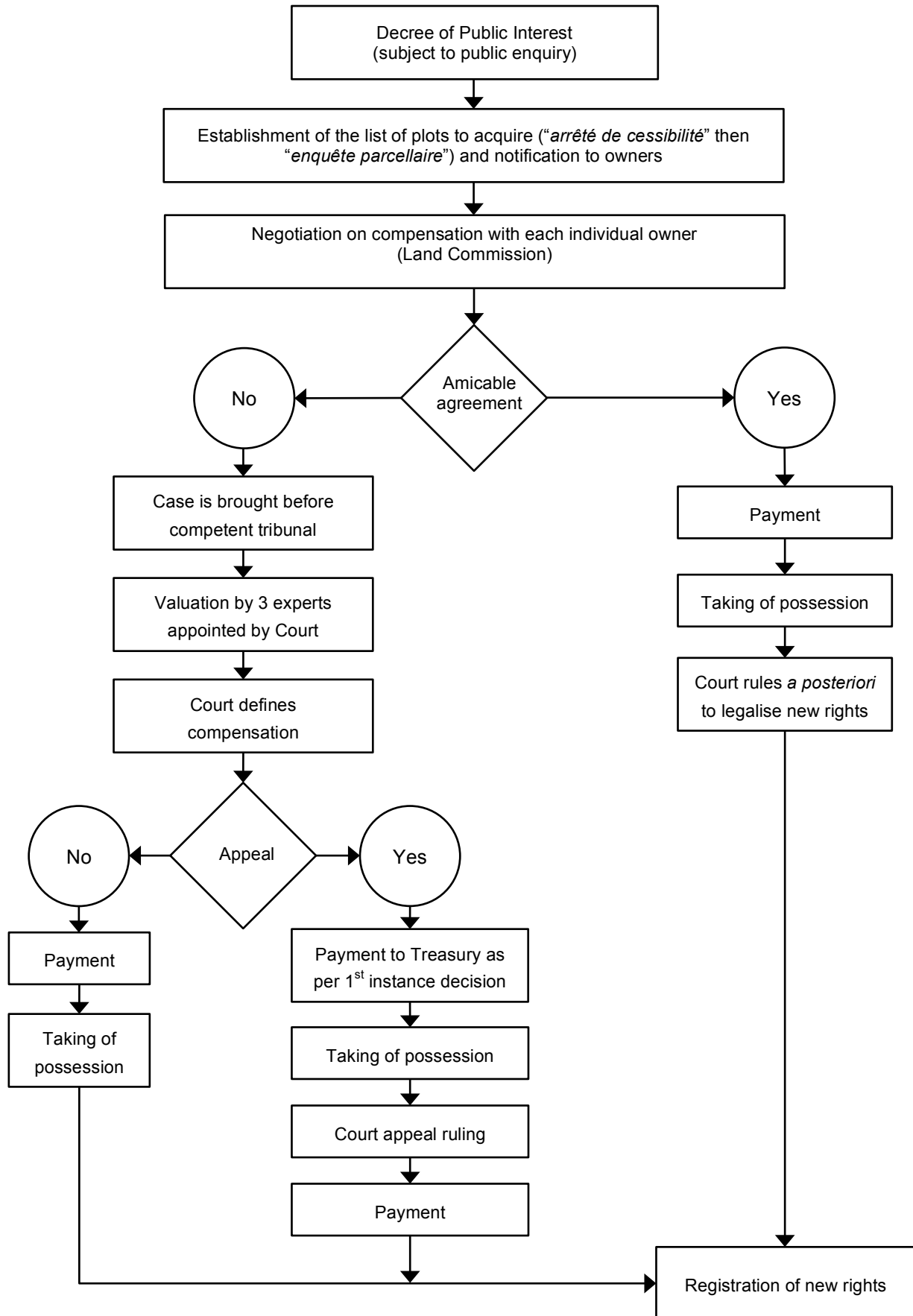
51. According to the Urban Code, the State is responsible for the management and development of the national territory. Associated prerogatives are given by Law to ministers, governors, Prefects, and mayors (Art. L. 111.2).

2.4 LAND ACQUISITION PROCEDURE

52. Two options are available for the Project to be able to obtain the necessary rights on land:
- a. The Expropriation process (Land Code), through a Declaration of Public Interest (DPI)

- b. The Mining Code process, which allows for compensation of the owners and occupants without having to obtain a DPI.
53. The following Figure 2.1 shows the expropriation process.

Figure 2.1: Main Steps of the Expropriation Process According to the Land Code of Guinea



54. In areas granted to GAC by the Concession agreement, GAC can apply the process envisioned in the Mining Code and will do so.

2.5 INSTITUTIONAL FRAMEWORK

2.5.1 Legislation

55. Applicable Guinean legislation does not allocate the responsibility for compensation and/or resettlement to a specific institution. In fact, the Land Code infers that the beneficiary of the Declaration of Public Interest, whether the State or a public or private entity, may carry out most of the expropriation process itself, as long as the following Government involvement is fulfilled:
- a. The list of expropriated properties must be endorsed by the Minister in charge of Public Domain (Ministry of Urban Planning) who takes an order in this purpose (“arrêté de cessibilité” – Art. 58);
 - b. The Land Commission (“commission foncière et domaniale”, which in principle is attached to each Préfecture), is the negotiating body in the amicable phase of the negotiation process. The constitution and powers of the Land Commission are described in the Land Code under Articles 49 to 53. It is composed of representatives of four ministries (Urban Planning, Agriculture, Home Affairs, Mines) and 3 other individuals appointed by the Prefect, and chaired by the representative of the Ministry of Urban Planning.
56. With respect to the procedures defined in the Mining Code, the beneficiary of the Mining Title is allowed to carry out the displacement and compensation as long as a general framework has been defined in the Mining Title (Article 69 of the Mining Code) and has been approved by the Ministry in charge of Mining.

2.5.2 Government Support and Involvement

57. Government, and particularly local authorities (Préfecture and Sub-Préfecture levels), can provide critical support and advice:
- a. At the planning stage:
 - i. Validating resettlement action plans prepared by mining companies, including compensation and resettlement strategies and principles, compensation rates, grievance mechanisms, and implementation arrangements;
 - ii. Assisting in identifying and securing resettlement sites;
 - iii. Validating the census of affected people and affected assets, and the related lists of eligible people and assets;
 - b. At the implementation stage:
 - i. Validating compensation proposals prepared by the Company;
 - ii. Participating in monitoring and evaluation.
58. However, Government agencies do not have to be involved in the actual delivery of entitlements, particularly not in payment of compensation.

2.5.3 Traditional Authority and Customary Land Tenure

59. The power of founding lineages remains very strong in the Concession area. Distinct dynamics of social power and hierarchy can be observed between founding villages (who allocate land to others) and dependent villages.

60. There are many overlaps in the day-to-day management of land between customary authorities and Government appointed leaders such as District and Sector leaders. Tensions can be observed in some villages, while others have found a smooth 'modus vivendi'.
61. The potential tension between customary authority and legal authority need to be kept in mind and managed carefully by the Project. Local authorities, both customary and Government appointed, could see their legitimacy jeopardised if the outcomes of the Project do not meet expectations of the communities.
62. Land in rural Guinea is the property of the State. As a result, within the Mining Concession, as well as in other rural areas of Guinea, individuals and families do not legally "own" the land in the modern meaning of the word, and do not have formal legal "Title" to land and property.
63. The so-called "founding" lineages are those, which were the first to settle in a given area and conferred rights of access and use on their land to other populations, along with a right to set up a new settlement. There is, hence, an unequal distribution of the land and of dependency relationships between lineages, families and/or villages, which sometimes results in ambiguities on the status and boundaries of certain plots of land.
64. The notion of "property and right of use of the land" is essentially collective, not only within the same families and settlement but also between families and settlements. Given that the main economic activities are cattle rearing and slash-and-burn agriculture, which necessitate the ability of populations to access large surface areas of land, but whose exact location matters little, the same area of land may encompass different resources (agricultural, pastoral, forest, etc.) with each resource being the object of specific rules of access and use.
65. Significant population growth over recent years has contributed to increased pressure on land within the mining concession area and other zones of operation which can be observed through:
 - a. increasing reticence of certain villages in allowing transhumant pastoralists onto their land;
 - b. the increasing development of perennial crops (particularly cashews);
 - c. the significant reduction in the average fallow time over recent years;
 - d. the appearance of rental practices for vegetable plots or pasture land; and
 - e. increasing monetization of land transactions, with access to land now being increasingly subject to payments in cash to lineage or village heads.
66. This results in acquisition by private owners of land rights, which they may seek to sanction in a formal title. In some cases this process follows the official legal and administrative channels but in others ownership is transferred and recognized through financial payment but without the corresponding legal and administrative processes (land title documents).
67. Land availability and access is a key issue within the concession area and is likely to become more pronounced as the Mine removes more and more land from community use for its operations. Impacts are likely to be significant, not only in terms of livelihoods but also because land access and control constitute a major factor in the social relationships within families, lineages and communities on the concession.
68. GAC will, seek full consultation and involvement of traditional authorities, in tandem with local authorities, in all matters related to land. This includes identifying potential replacement land that meets the livelihood and socio-cultural requirements of affected population(s) whilst maintaining traditional linkages to, and rights over, customary land. Where possible and appropriate every effort should be made to include traditional authorities in the resettlement committees and other forums for consultation, whilst ensuring that the process of democratic participation remains in-tact.

2.5.4 Civil Society and NGO Institutional Capacity

69. GAC works in partnership and consults with Civil Society organisations, including local, national and international NGOs as an integral part of its community, environmental and governance functions and responsibilities. A list of NGOs active in the project areas can be found in Appendix 1.

2.5.5 International Requirements

2.5.5.1 Equator Principles and IFC Performance Standards (World Bank Group)

70. The Equator Principles (EPs) is a risk management framework adopted by financial institutions for determining, assessing and managing environmental and social risk in projects based on IFC Performance Standards. The IFC's social and environmental policies (which are based on World Bank Operational Directives (ODs)) include an overarching Sustainability Framework, and eight Performance Standards. This set of requirements was first issued in 2006 and was revised in 2012. In addition to the IFC itself, all major bilateral Export Credit Agencies, as well as more than 80 large commercial banks signatory to the Equator Principles apply the IFC's Performance Standards.
71. The following provisions of the fifth Performance Standard (PS5) "Land Acquisition and Involuntary Resettlement" are relevant for this Resettlement Policy Framework:
- a. IFC Performance Standard 5 distinguishes physical displacement (loss of shelter) and economic displacement (loss of means of livelihood); both Physically Displaced and Economically Displaced People are to be considered in resettlement planning;
 - b. Stated objectives of resettlement planning are:
 - i. To avoid or at least minimize involuntary resettlement wherever feasible by exploring alternative project designs,
 - ii. To mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of land by: (i) providing compensation for loss of assets at replacement cost; and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected,
 - iii. To improve or at least restore the livelihoods and standards of living of displaced persons,
 - iv. To improve living conditions among displaced persons through provision of adequate housing with security of tenure at resettlement sites;
 - c. The Project must offer displaced persons and communities compensation for loss of assets at full replacement cost and other assistance to help them improve or at least restore their standards of living and livelihoods;
 - d. Where livelihoods of displaced persons are land-based, or where land is collectively owned, land-based compensation should be provided, where feasible;
 - e. The Project must consult with and facilitate the informed participation of affected persons and communities, including host communities, in decision-making processes related to resettlement. Consultation will continue during the implementation, monitoring, and evaluation;
 - f. The Project must establish a grievance mechanism consistent with Performance Standard 1 to receive and address specific concerns about compensation and relocation that are raised

- by displaced persons or members of host communities, including a recourse mechanism designed to resolve disputes in an impartial manner;
- g. The Project must carry out a census with appropriate socio-economic baseline data to identify the persons who will be displaced by the project, to determine who will be eligible for compensation and assistance, and to discourage inflow of people who are ineligible for these benefits. Cut-off date for eligibility will be established and information regarding these will be well documented and disseminated throughout the project area;
 - h. If people living in the project area must move to another location, the Project must: (i) offer displaced persons choices among feasible resettlement options, including adequate replacement housing or cash compensation where appropriate; and (ii) provide relocation assistance suited to the needs of each group of displaced persons, with particular attention paid to the needs of the poor and the vulnerable. Alternative housing and/or cash compensation must be made available prior to relocation. New resettlement sites built for displaced persons must offer improved living conditions;
 - i. If land acquisition for the Project causes loss of income or livelihood, regardless of whether or not the affected people are physically displaced, the Project must meet the following requirements:
 - i. Compensate economically displaced persons for loss of assets or access to assets at full replacement cost and prior to the actual impact taking place.
 - ii. In cases where land acquisition affects commercial structures, compensate the affected business owner for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery or other equipment.
 - iii. Provide replacement property (e.g., agricultural or commercial sites) of equal or greater value, or cash compensation at full replacement cost where appropriate, to persons with legal rights or claims to land which are recognized or recognizable under the national laws.
 - iv. Compensate economically displaced persons who are without legally recognizable claims to land for lost assets (such as crops, irrigation infrastructure and other improvements made to the land) other than land, at full replacement cost. However, the Project is not required to compensate or assist opportunistic settlers who encroach on the project area after the cut-off date.
 - v. Provide additional targeted assistance (e.g., credit facilities, training, or job opportunities) and opportunities to improve or at least restore their income-earning capacity, production levels, and standards of living to economically displaced persons whose livelihoods or income levels are adversely affected.
 - vi. Provide transitional support to economically displaced persons, as necessary, based on a reasonable estimate of the time required to restore their income earning capacity, production levels, and standards of living.

2.5.5.2 AfDB Integrated Safeguards System

- 72. 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.
- 73. Operational Safeguards (OSs) are a set of five safeguard requirements that form the cornerstone of the AfDB's Integrated Safeguards System (ISS) and seek to promote growth that is socially inclusive

and environmentally sustainable. Bank clients are expected to meet these Operational Safeguards when addressing social and environmental impacts and risks. They apply to all Bank lending operations, both public and private sector, and to project activities funded through other financial instruments managed by the Bank.

74. Of these Operational Safeguards OS 2 on Involuntary Resettlement, Land Acquisition, Population Displacement and Compensation, as discussed below, is of particular relevance to this LACRF. It covers all components of a project, including activities resulting in involuntary resettlement that are directly and significantly related to a Bank-assisted project and necessary to achieve its objectives—whether the resettlement is led by a government, a private sponsor, or both—and carried out or planned to be carried out contemporaneously with the project. It aims to clarify all aspects of impacts related to land acquisition. In line with the framework in the involuntary resettlement policy, this OS covers economic, social and cultural impacts associated with Bank-financed projects involving involuntary loss of land, involuntary loss of other assets, or restrictions on land use and on access to local natural resources that result in:
- a. Relocation or loss of shelter by the people residing in the project area of influence;
 - b. Loss of assets (including loss of structures and assets of cultural, spiritual, and other social importance) or restriction of access to assets, including national parks and protected areas or natural resources; or
 - c. Loss of income sources or means of livelihood as a result of the project, whether or not the people affected are required to move.
75. When a project requires the temporary relocation of people, the resettlement activities should be consistent with this OS, while taking into account the temporary nature of the displacement. The objectives are to minimise disruption to the affected people, avoid irreversible negative impacts, provide satisfactory temporary services and—where appropriate—compensate for transitional hardships.
76. The specific objectives of OS 2 are to:
- a. Avoid involuntary resettlement where feasible, or minimise resettlement impacts where involuntary resettlement is deemed unavoidable after all alternative project designs have been explored;
 - b. Ensure that displaced people are meaningfully consulted and given opportunities to participate in the planning and implementation of resettlement programmes;
 - c. Ensure that displaced people receive significant resettlement assistance under the project so that their standards of living, income-earning capacity production levels and overall means of livelihood are improved beyond pre-project levels;
 - d. Provide explicit guidance to borrowers on the conditions that need to be met regarding involuntary resettlement issues in Bank operations to mitigate the negative impacts of displacement and resettlement, actively facilitate social development and establish a sustainable economy and society; and
 - e. Guard against poorly prepared and implemented resettlement plans by setting up a mechanism for monitoring the performance of involuntary resettlement programmes in Bank operations and remedying problems as they arise.

2.5.6 Guinean Law, IFC and AfDB Requirements

77. GAC adheres strictly to IFC Performance Standards and AfDB ISS. Gaps between national/local laws and IFC and AfDB guidelines are described in the following Table 2.1 and Table 2.2.

78. Wherever Guinean law requirements are less favourable to affected people than IFC's or AfDB's requirements, the latter shall apply. GAC will ensure that compliance with IFC's and AfDB's requirements is attained including if certain steps of the land acquisition process are to be implemented by the Government of Guinea.

Table 2.1: Comparison of Guinean Law with IFC's and AfDB's Requirements Regarding Compensation

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
Impacts on Titled Land Owners	<p>“Fair and prior” cash compensation. No detailed provision as to the calculation of compensation.</p> <p>No provisions with regards to resettlement or “land-for-land” compensation but these are not explicitly prohibited.</p> <p>No entitlement for specific assistance triggered by displacement/relocation. People who lose only a part of the plot can require expropriation of the whole plot.</p>	<p>Strongly recommends land-for-land compensation.</p> <p>Compensation is at full replacement cost and is viewed as one of many elements within a comprehensive rehabilitation strategy (“no worse off” and preferably “better off” requirement.)</p> <p>Compensation to be made prior to impacts.</p>	<p>Priority given to land-for-land compensation.</p> <p>Compensation provided should be at full replacement cost and prior to impacts.</p> <p>Displaced people must be provided with land for which a combination of productive potential, location advantages and other factors, is equivalent to, or better than, the land taken.</p>	<p>Priority for land-for-land / like for like compensation</p> <p>Compensation for lost assets at full replacement cost</p> <p>Compensation is at full replacement cost and is viewed as one of many elements within a comprehensive rehabilitation strategy (“no worse off” and preferably “better off” requirement.)</p> <p>Compensation prior to impacts.</p>
Impacts on Customary Land Users	<p>Article 39 of the Land Code indicates that “<i>bona fide</i>” occupants can be granted the same benefits in terms of compensation for developments (structures, land improvements, crops etc.) as titled owners.</p>	<p>Whatever the legal recognition of their occupancy, all people must be compensated along the same principles as legally recognised owners.</p> <p>Customary owners are not eligible to cash compensation for land as customary land is deemed to be the formal property of the State. They may receive cash compensation for any structures, immovable assets and improvements made to the land but like-for-like and land based compensation prioritised.</p> <p>Common property resources, (i.e. pasture land, fruit trees, medicinal plants, firewood and other forest products croplands, fallow lands, fish stocks etc.), whilst not, by definition, owned by individual households, are often an important component of affected households livelihoods without which they could face the risk of project induced impoverishment. Appropriate, in kind compensation to be made for common resources.</p>	<p>Persons who may not have formal legal rights to land or other assets at the time of the census/ evaluation but can prove that they have a claim that would be recognised under the customary laws of the country are eligible to compensation of resettlement assistance.</p> <p>This category may also include people who may not be physically residing at the project site or persons who may not have any assets or direct sources of livelihood derived from the project site, but who have spiritual and/or ancestral ties with the land and are locally recognised by communities as customary inheritors.</p> <p>If possible, compensation is made in kind for loss of common property resources, such as rivers, lakes or forest resources. Particular attention is given to replacing not only the common property itself, but also the particular services and community inter-linkages that it provided.</p> <p>When a project involves the loss of public facilities, infrastructure, and</p>	<p>All PAPs compensated along the same principles as legally recognised owners, including customary ownership.</p> <p>Customary owners are not eligible to cash compensation for land as customary land is deemed to be the formal property of the State.</p> <p>Compensation is made in kind for loss of common property resources.</p> <p>Affected communities involved in identifying and agreeing on suitable alternatives that are equivalent to, or an improvement on, public facilities, infrastructure, and common property resources, being lost.</p> <p>Socio-cultural issues identified as part of SEIA and SEMP processes. Attempts made to avoid the destruction of cultural, religious and archaeological sites—including natural sites and habitats valued for cultural, religious and archaeological reasons. Where this is not possible, alternative sites and solutions that are acceptable to the affected population will be explored.</p>

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
			<p>common property resources, the affected community must be involved in identifying and agreeing on suitable alternatives that are equivalent to, or an improvement on, those being lost.</p> <p>In addition to material provisions, the Operational Safeguard 2 addresses socio-cultural issues and attempts to avoid the destruction of cultural, religious and archaeological sites—including natural sites and habitats valued for cultural, religious and archaeological reasons—or to provide alternative sites that are acceptable to the affected population.</p>	
<p>Impacts on Land Tenants and Sharecroppers</p>	<p>Article 59 can be interpreted as granting “occupants and notorious users” with rights to compensation.</p>	<p>Not entitled to compensation for land. Entitled to compensation for assets and improvements made to land. Income/livelihoods must be restored as if the loss of land, or access to land, causes loss of income. Provisions to restore income/livelihoods include⁵:</p> <ul style="list-style-type: none"> a). Assistance in acquiring or accessing replacement land (including access to grazing land and other natural resources; b). Physical preparation of farm land (e.g. clearing, preparation etc.); c). Fencing for pasture of cropland; d). Agricultural inputs (e.g. seeds, seedlings, fertiliser, irrigation 	<p>Depending on the country’s customary land use rights, sharecroppers, tenant farmers, and seasonal migrants or nomadic families losing user rights may also be considered to have a claim for compensation or resettlement assistance.</p> <p>In addition persons with no recognisable legal right or customary claim to the land they are occupying in the project area of influence may be entitled to resettlement assistance and compensation (excluding compensation for land but including compensation or loss of livelihood activities, common property resources, structures and crops etc.) if they can demonstrate that they have occupied the area of influence</p>	<p>Entitled to resettlement assistance and compensation (excluding compensation for land but including compensation or loss of livelihood activities, common property resources, structures and crops etc.) Income must be restored as long as the loss of land causes loss of income. Provisions to restore income/livelihoods include:</p> <ul style="list-style-type: none"> a). Assistance in acquiring or accessing replacement land (including access to grazing land and other natural resources; b). Physical preparation of farm land (e.g. clearing, preparation etc.); c). Fencing for pasture of

⁽⁵⁾ IFC Guidance Note 5 – Land Acquisition and Involuntary Resettlement [GN12]

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
		etc.); e). Veterinary care ; f). Small scale credit; and g). Assistance with access to markets.	for at least six months prior to a cut-off-date.	cropland; d). Agricultural inputs (e.g. seeds, seedlings, fertiliser, irrigation etc.); e). Veterinary care; f). Small scale credit; and g). Assistance with access to markets;
Impacts on Structures	Buildings are considered to be “immovable assets” and are eligible for compensation in the event of expropriation or occupancy but no specific or detailed guidelines other than the general “fairness” principle. Assets that are not lost but can no longer be used (or accessed) are eligible for compensation.	In-Kind compensation (preferable) or cash compensation at full replacement cost including labour.	In-Kind compensation (preferable) or cash compensation at full replacement cost including labour.	In-kind compensation (preferable) or cash compensation at full replacement cost including labour.
In-kind compensation (replacement of land or structures by equivalent properties)	Not specifically addressed (but not explicitly excluded)	“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. “Provision of adequate housing (at equal or better standard) and a degree of security of tenure to displaced persons at resettlement sites” ⁶	Priority given to land-for-land compensation. Where land is not the preferred option of displaced people, non-based land options may be considered but preference should always be given to providing compensation in kind in lieu of cash compensation. Displaced people must be provided with land for which a combination of productive potential, location advantages and other factors, is equivalent to, or better than, the land taken.	Priority given to land-for-land compensation and compensation in kind over cash compensation. In cases where land is not the preferred / feasible option for displaced people, non-based land options may be considered but preference will always be given to providing compensation in kind in lieu of cash compensation. Displaced are provided with land for which a combination of productive potential, location advantages and other factors, is equivalent to, or better than, the land taken. Security of tenure provided on resettlement sites.
Impacts on Crops	Cash compensation based upon unit rates established by the Ministry of	Transition period between planting and effective production should be	The affected populations and host communities are provided with	Compensation at replacement cost and support provided to assist with

⁽⁶⁾ IFC Guidance Note 5 – Land Acquisition and involuntary resettlement [GN13]

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
	Agriculture.	taken into account as part of livelihood restoration. This period may be several years for fruit trees and some other crops.	support before, during, and after relocation, for a transition period that covers a reasonable period of time necessary for them to re-establish themselves and improve their standards of living, income-earning capacity, production levels and overall means of livelihood.	transition period. The affected populations and host communities are provided with support before, during, and after relocation, for a transition period that covers a reasonable period of time necessary for them to re-establish themselves and their livelihoods.
Impacts on Business Income	Not specifically addressed although the Mining Code 2013 (Art. 170) does mention the responsibility of Mining companies to use Guinean companies when they offer similar services (in terms of price, time, and quality)	Establish access to similar opportunities and restore income	Establish access to similar opportunities and improve income	Establish access to similar opportunities and restore income
Impacts on Livelihoods and Livelihood Restoration	Not specifically addressed although the Mining Code 2013 specifies that employment is reserved only to Guinean citizens for unskilled jobs (reference to Articles 108 and 109 of the Mining Code) and that some unskilled jobs must be reserved for the local community (Article 108).	It is required that the project “improve or at least restore (PAP’s) income earning capacity, production levels and standards of living, including transitional assistance and other assistance to be provided.	Displaced people are provided with targeted resettlement assistance with the aim of ensuring that their standards of living, income-earning capacity, production levels and overall means of livelihood are improved beyond pre-project levels. Comprehensive livelihood improvement programme must be formulated and implemented as part of the RAP, offering affected populations a range of different compensation packages, resettlement assistance, and livelihood improvement options, as well as options for administering these measures at different levels (e.g., family, household and individual), and for which the affected persons themselves are given the opportunity to express their preferences. In general, compensation arrangements, resettlement assistance and livelihood improvement measures, such as skills training, are made equally	GAC will seek to “improve or at least restore (PAP’s) income earning capacity, production levels and standards of living, including transitional assistance and other assistance to be provided. Comprehensive livelihood improvement programmes will be formulated as part of each RAP and implemented by the Community Department. Affected populations will be offered a range of different compensation packages, resettlement assistance, and livelihood improvement options, as well as options for administering these measures at different levels (e.g., family, household and individual), Compensation arrangements, resettlement assistance and livelihood improvement measures are made equally available to all social groups and adapted to their specific needs.

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
			available to all social groups and adapted to their specific needs, even when land is owned by the state or communally and settlers are not entitled to land ownership.	
Valuation	Market value (<i>“valeur vénale”</i>). 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.	Replacement value, which is defined in IFC PS5 as <i>“the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow Affected Communities and persons to replace lost assets with assets of similar value. The valuation method for determining replacement cost should be documented and included in applicable Resettlement and/or Livelihood Restoration plans”</i>	Compensation at full replacement value including labour costs.	Replacement value, which is defined in IFC PS5 as <i>“the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow Affected Communities and persons to replace lost assets with assets of similar value. The valuation method for determining replacement cost should be documented and included in applicable Resettlement and/or Livelihood Restoration plans”</i>

Table 2.2: Comparison of Guinean Law with IFC's AfDB's Requirements Consultation Documentation and Other

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
Consultation and disclosure	<p>Expropriation Decree to be disclosed individually to affected owners but no provision for collective consultation</p> <p>Consultation on the SEIA</p>	<p>Resettlement planning to include meaningful engagement with, and participation of affected persons and other stakeholders.</p> <p>Disclosure of draft and final resettlement frameworks or plans for a period of 60 days</p>	<p>Open, inclusive and effective consultation with local communities includes the following elements:</p> <ul style="list-style-type: none"> • Appropriate notice to all potentially affected persons that resettlement is being considered; • Effective advance dissemination by the authorities of relevant information, including land records and proposed comprehensive resettlement plans; • A reasonable time period for public review of, comments on, and/or objection to any options of the proposed plan; and • Public hearings that provide affected persons and/or their legally designated representatives with opportunities to challenge the resettlement design and process, and/or to present and discuss alternative proposals and articulate their views and development priorities. 	<p>Resettlement planning to include meaningful engagement with affected persons and other stakeholders and disclosure of draft and final resettlement frameworks or plans for a period of 60 days</p> <p>Open, inclusive and effective consultation with local communities includes the following elements:</p> <ol style="list-style-type: none"> a). Appropriate notice to all potentially affected persons that resettlement is being considered; b). Effective advance dissemination by the authorities of relevant information, including land records and proposed comprehensive resettlement plans; c). A reasonable time period for public review of, comments on, and/or objection to any options of the proposed plan; and d). Public hearings that provide affected persons and/or their legally designated representatives with opportunities to challenge the resettlement design and process, and/or to present and discuss alternative proposals and articulate their views and development priorities.
Grievance redress	<p>Through the Court system</p>	<p>Should be transparent, effective and easily accessible to affected persons.</p> <p>Every effort should be made to resolve grievances at the community level, taking into consideration any customary or traditional methods of dispute resolution within the affected</p>	<p>Need to establish a “credible, independent and empowered local grievance and redress mechanism to receive, facilitate and follow up on the resolution of the affected people’s grievances and concerns regarding the environmental and social performance of the project. The local grievance</p>	<p>GAC endeavors to provide a credible, transparent and easily accessible grievance management process at the community level that allows for meaningful independent redress to the complainant where appropriate. It also serves to provide valuable information and feedback, allowing the company to</p>

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
		households / communities, without impeding access to any judicial or administrative remedies.	mechanism needs to be sufficiently independent, empowered and accessible to the stakeholders at all times during project cycle and all responses to grievances shall be recorded and included in project supervision formats and reports". ⁷	continually improve its operational performance.
Monitoring and Evaluation	Not specifically addressed	Monitoring and evaluation should be on-going during and after resettlement activities.	<p>The AfDB requires that borrower or client is responsible for the implementation, monitoring and evaluation of the activities set out in the Resettlement Action Plan, and it keeps the Bank informed of progress. Resettlement must be fully and specifically covered in the reports on the progress of the overall project.</p> <p>Affected people are given the opportunity to participate in RAP implementation monitoring.</p> <p>For large-scale or complex resettlement operations, quarterly reviews are preferred, and in-depth reviews of midterm progress, consistent with the overall project scheduling, are required.</p> <p>The borrower and the Bank carry out an independent ex-post evaluation—a Resettlement Action Plan completion audit or implementation completion report to examine the effectiveness of the mitigation measures recommended and implemented.</p> <p>Upon completion of the project, the borrower or client assesses the success of the Resettlement Action Plan and includes relevant information in the Project Completion Report (PCR). The Bank develops its own PCR. If either of</p>	<p>Monitoring and evaluation (both internal and external) be on-going during and after resettlement activities.</p> <p>Affected people are given the opportunity to participate in RAP implementation monitoring.</p> <p>Close-Off audit will always be undertaken by independent external consultants.</p>

⁽⁷⁾ African Development Bank Operational Safeguard (OS1)

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
			these assessments reveals that any key objectives of the Resettlement Action Plan were not achieved, follow-up measures are developed to remedy the situation.	
Consultation	No specific requirement related to resettlement and compensation but there are consultation requirements in relations to SEIAs	Consultation with PAPs and other stakeholders is required. Outcomes of consultation must be reflected in the action plans. Consultation is expected to be on-going during implementation of the RAP and also during monitoring activities post RAP.	<p>The Bank considers broad community support to be a key principle and an achievement that demonstrates that borrowers and clients have used openness, transparency, and inclusiveness in making decisions about the project, and have made genuine efforts to maximise benefits to communities and reduce any harmful impacts. The Bank therefore requires that borrowers and clients fulfil the requirements for broad community support.</p> <p>Special attention must be given to consultations that involve vulnerable groups. In the context of gender vulnerability, for example, actively facilitating consultation with, and participation by, both women and men in ways that are sensitive to the social and political constraints and barriers that women and men may face. Particular attention should be paid to the location and scheduling of consultation activities to ensure that people of all ages and social groupings can attend and participate with confidence and ease. The ways in which information is disseminated must also carefully considered, as levels of literacy and networking may differ according to age, gender, economic status and other lines of social hierarchy/ discrimination.</p>	<p>Consultation with PAPs and other stakeholders is regular and on-going during the development and implementation of each RAP as well as during monitoring and close-out activities.</p> <p>Outcomes of consultation are reflected in the RAPs.</p> <p>Attention is given to ensuring that consultation with affected populations is sensitive to gender and vulnerability issues and that women and vulnerable groups/ households are fully included and able to participate in the decisions which affect their lives.</p> <p>Information will be provided to affected communities (via resettlement consultation committees and plenary meetings as well as via local and traditional authorities). Minutes of each community meeting, as well as general feedback will be provided to affected households and populations both in written and verbal format in French and/or the relevant local language</p>
Documentation	No specific document addressing resettlement and compensation is required from a Project sponsor beyond the	It is a requirement that a Resettlement Action Plan with specific livelihood restoration and/or Resettlement Framework be developed and consulted on and disclosed.	It is a requirement that Resettlement Action Plans be developed, consulted on and disclosed. A Full Resettlement Action Plan (FRAP)	Resettlement Action Plans, for each RAP undertaken will be developed, consulted on and disclosed in accordance with Guinean law and IFC

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
	<p>usual SEIA. However, SEIAs are expected to address resettlement and compensation in detail</p>	<p>For projects with sub-projects or multiple components that cannot be identified before project approval a Resettlement Policy Framework should be developed</p>	<p>must be developed for (i) any project that involves 200 or more persons (as defined by the involuntary resettlement policy), or (ii) any project that is likely to have adverse effects on vulnerable groups.</p> <p>For any project in which the number of people to be displaced is fewer than 200 people and land acquisition and potential displacement and disruption of livelihoods are less significant, an Abbreviated Resettlement Action Plan (ARAP) may be developed.</p>	<p>and AfDB standard.</p> <p>This LACRF has been developed to provide a systematic framework of compensation and resettlement standards/processes for RAPs linked to future project phases and components.</p>
<p>Impacts on Vulnerable Groups</p>	<p>Not specifically addressed</p>	<p>It is required that vulnerable groups be identified and assisted.</p>	<p>Social structures and community networks among the affected persons should be maintained. Support and advice are made available to help the affected persons cope with, and benefit from, the resettlement process.</p> <p>Particular attention must be given to ensuring that the interests of both women and men and of the elderly and the handicapped are taken into account when formulating and implementing compensation packages, resettlement assistance measures and livelihood improvement measures.</p> <p>In assessing the potential impacts of Bank operations on affected communities, the borrower or client shall make use of adequate and qualified expertise to identify people and groups that may be directly, indirectly and/or disproportionately affected or marginalized by the project because of their recognized vulnerable status.</p> <p>Where groups are identified as vulnerable, the borrower or client shall implement appropriate differentiated measures so that unavoidable adverse impacts do not fall disproportionately on these vulnerable groups, and so that</p>	<p>Particular attention is given to ensuring that the interests of both women and men and of the elderly and the handicapped are taken into account when formulating and implementing compensation packages, resettlement assistance measures and livelihood improvement measures.</p>

Topic/Impact	Guinean Law	IFC Requirements	AfDB Requirements	GAC Policy
			<p>they are not disadvantaged in sharing development benefits and opportunities (such as roads, schools, healthcare facilities etc.).</p> <p>Gender issues should be assessed in the context of vulnerability. A gender assessment shall be made for every project and shall form the basis for project design and compensation plans that lead to enhanced gender balance.</p>	

2.6 ORGANISATIONAL ARRANGEMENTS, ROLES AND RESPONSIBILITIES**2.6.1 Overview**

79. GAC will implement the RAP with its own resources (including consultants, contractors and NGO's where required) and take full responsibility for its funding and implementation. Other stakeholders will be involved as follows:

2.6.1.1 Government Stakeholders

- a. The Municipality of Kamsar, the Préfecture of Boké and the Sous-Préfectures of Kamsar, Tanéné and Sangarédi will facilitate and monitor the whole process, particularly but not only in regards to final allocation to GAC of the Filima resettlement site and the resettlement site on the concession.
- b. The Préfecture of Boké has an active Resettlement Steering Committee under the chairmanship of the Préfecture'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 Préfecture, specifically in regards of mining activities. 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.
- c. The Housing and Urban Planning ("Service de l'Habitat et de l'Urbanisme") department of the Boké Préfecture 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.
- d. The Ministry of Education is responsible for planning educational facilities and posting teachers and other staff to such facilities.
- e. The Ministry of Health has similar prerogatives in regards of health care.
- f. Community stakeholders:
- g. The community will be associated through its Resettlement Committee.

2.6.2 Internal GAC Roles and Responsibilities**2.6.2.1 Resettlement Project Manager**

80. Resettlement activities at GAC are placed under the responsibility of the Resettlement Project Manager, reporting to the Health, Safety, Security, Environment, and Community (HSSEC) Manager, who in turn reports to the GAC Chief Executive Officer. The responsibilities of the Resettlement Project Manager are the following:
- a. Overall coordination and supervision of the resettlement planning and implementation;
 - b. Supervision of resettlement site planning;
 - c. Supervision of housing planning and design;
 - d. Supervision of resettlement site development works, including earth and other works related to access, site subdivision, public utilities, water supply, power supply, etc....

- e. Supervision of entitlement delivery, including housing, cash compensation, and business park;
 - f. Supervision of monitoring and reporting activities;
 - g. Integration with GAC's Community Development Team to achieve livelihood restoration commitments and ensure alignment;
 - h. Health and safety aspects;
 - i. Contracting and payments to contractors;
 - j. Budget and schedule monitoring;
 - k. Compliance.
81. The Resettlement Project Manager is supported by the Site Development and Construction Supervision Team (see Section 2.6.2.3), which report to him/her.

2.6.2.2 Resettlement Superintendent

82. Reporting to the Resettlement Project Manager, the Resettlement Superintendent has the following responsibilities:
- a. Supervision of survey of secondary displacement at the resettlement sites, and related consultation with communities and affected people;
 - b. Supervision of all engagement and negotiations activities;
 - c. Supervision of information management and timely delivery of compensation supporting documentation (inventory sheets, compensation sheets, compensation agreements);
 - d. Supervision of the delivery of cash compensation, including opening of bank accounts and money management awareness and training;
 - e. Organisation and supervision of the move, including preparation and delivery of associated hand-over documentation;
 - f. Organisation of plot allocation in the residential and agricultural areas;
 - g. Organisation of plot allocation in the business park;
 - h. Organisation of post-resettlement awareness and training activities in regards of the on-going management and hand-over of the resettlement houses, water facilities, waste management skids, etc.;
 - i. Facilitation of staff posting to educational facilities built under the resettlement project;
 - j. Identification of, and assistance to vulnerable people;
 - k. Monitoring and evaluation, particularly in terms of compiling all relevant status and outcome indicators required for internal and external monitoring and reporting.
83. The Resettlement Superintendent is supported by the Compensation and Resettlement Team which report to him/her. The Resettlement Superintendent acts on behalf of the Resettlement Project Manager in his/her absence.

2.6.2.3 Resettlement Construction Superintendent and Site Development and Construction Supervision Team

84. Reporting to the Resettlement Project Manager, the Site Construction Supervision Team is headed by a Construction Superintendent supported by two to four construction supervisors, who are responsible for the following:

- a. Preparation of bidding documents for earthworks and house construction;
- b. Preparation of bidding documents for communal facilities (mosque, market, additional classrooms at the existing school, drilled wells, waste management facilities, solar power supply equipment if applicable) and related consultations with relevant institutions on applicable standards (Ministry of Education);
- c. Bid review and technical selection;
- d. Construction supervision at site and associated contractor management;
- e. Checks and commissioning upon work completion;
- f. Preparation of guidelines for house maintenance by resettled homeowners, applicable during and after the guarantee period.

2.6.2.4 Compensation and Resettlement Team

85. This team includes about 10 individuals, headed by a Compensation Coordinator, reports to the Resettlement Superintendent, and has the following responsibilities:
- a. Survey in the field of secondary displacement at the resettlement sites, and related data management, including preparation of documentation associated to relevant cash compensation;
 - b. Delivery of compensation supporting documentation (inventory sheets, compensation sheets, compensation agreements);
 - c. Negotiations with affected households and businesses on their entitlements, and associated explanations on entitlement documents to be signed off by affected households and businesses;
 - d. Verification that physically displaced households opting for self-relocation do have alternative housing readily available;
 - e. Delivery of cash compensation, including supporting the opening of bank accounts, and related documentation tasks;
 - f. Organisation and supervision of the move, including preparation and delivery of associated hand-over documentation;
 - g. Delivery of post-resettlement awareness and training activities;
 - h. Assistance to vulnerable people.

2.6.2.5 Grievance Management

86. Grievance management is under the responsibility of the Community Affairs department of GAC, which is separate from the Resettlement Department and under the responsibility of a different manager. This separation ensures that there is no conflict of interest in grievance processing. The grievance procedure is detailed in document 900-C-CPD-00015 (Rev 1) "Managing Community Complaints".

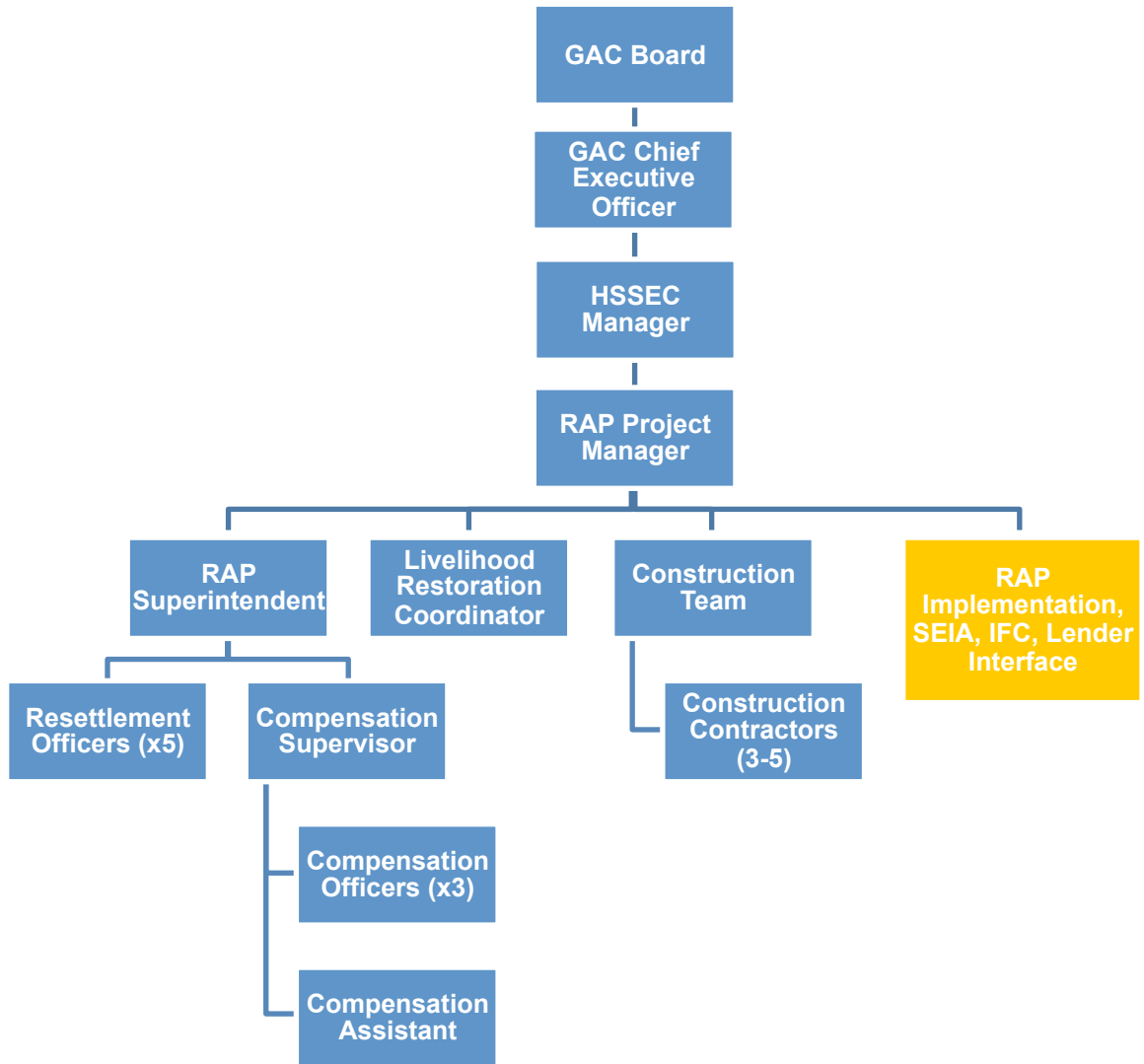
2.6.2.6 Information Management

87. GAC operates the Boréal information management system. All data pertaining to assets, socio-economic baseline information, and compensation is stored and managed in this system. Asset summary sheets, compensation sheets, and compensation agreements will be generated by the system. Grievances and stakeholder events are also managed using the same system.

2.6.3 GAC's Organisational Structure in Relation to Resettlement

88. The RAP Unit will be responsible for implementing two simultaneous RAPs (Kamsar and Beli Kindy in the GAC Concession), as well as planning RAPs for the next phases of resettlement in the 20 year Life of Mine.
89. The Current RAP Structure is depicted in Figure 2.2 below. The Resettlement Project Manager is responsible for the overall supervision of the department which encompasses all functions of resettlement (planning, implementation and monitoring and evaluation) including long-term strategic planning. The RAP Project Manager reports directly to the HSSEC Manager and through him to the Chief Executive Officer of GAC and the GAC/EGA Board in Dubai.
90. The development and implementation of the RAPs themselves is managed by the Resettlement Superintendent and supported by the Compensation and Resettlement Team.
91. The resettlement officers will be responsible for supporting the functions of liaison, communication and negotiation with project affected people and communities, as well as local and traditional authorities. They will be supported by the relevant personnel from GAC's Community and Government Relations departments. Strong lines of communication and coordination between departments will be maintained at all times and prioritised by GAC Management.
92. The compensation team is primarily responsible for the survey and compensation of land and assets relating to planned resettlements as well as ad hoc land take and damages (when these arise) , The team manages all data and records relating to resettlement. It is expected that central resettlement management and long-term planning, ad hoc land take and damages will be minimised.
93. The functions of PAP liaison and compensation will be split between Kamsar and the concession with a lead Resettlement Officer and a lead Compensation Officer in both locations, reporting to a central unit. This will ensure a cohesive and flexible approach for both RAPs currently being undertaken, as well as future RAPs yet to be developed; allowing for optimum flexibility and responsiveness to conditions on the ground as well as providing coherence and ensuring compliance with this LACRF and GAC business plans.
94. Additional resource requirements will be contracted as needed, including external consultancy and survey support for the census and development of new RAPs. As a general rule new RAPs will be developed using external consultancy support, as this provides elements of external impartiality, transparency and credibility, especially where:
- a. New communities or areas are impacted;
 - b. Complex land ownership or other issues are identified; or
 - c. Where the number of impacted households/communities is significant.
95. Internal resources may be used for the development of smaller RAPs (total of less than 20 households), small ad hoc land take or (limited) expansion of an already surveyed resettlement zone. The provisions of this LACRF will be applied to the development of internal RAPs. Use of internal resources to develop RAPs must be justified in writing. Internal RAPs will be subject to formal, external review by reputable resettlement experts and will follow the same process of government/public disclosure as externally developed RAPs.
96. Livelihood restoration implementation will be managed by the Community Development department in coordination with the RAP Unit.

Figure 2.2: GAC Organisation and Reporting Structure



3. LAND ACCESS AND RESETTLEMENT PROCESS

3.1 GAC'S GOVERNING PRINCIPLES FOR RESETTLEMENT AND COMPENSATION

97. GAC's governing principles for land acquisition, compensation and resettlement are the following:
- a. Land acquisition, compensation and resettlement are carried out in compliance with Guinean law as well as with IFC's Performance Standards (in particular PS 5 and 1) and AfDB Operational Safeguard 2.
 - b. Where Guinean law requirements differ from IFC or AfDB standards and guidelines, the more rigorous standards apply.
 - c. Affected people are eligible to applicable compensation, allowances, and benefits subject to their assets or livelihoods being found to be affected at the time of the Cut-Off-Date (at the time of the census).
 - d. 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.
 - e. Customary land rights are taken into account: land is generally deemed to be State property, and as such, loss of customary land occupation cannot be compensated in cash; however, customary owners are eligible to in-kind compensation for loss of customary land rights, such as land replacement or livelihood restoration packages. If land replacement is chosen, GAC will assist affected land users to access replacement land in its concession or elsewhere.
 - f. Affected people are offered an option between two or more compensation options. Specifically, physically displaced people are offered a choice between one or more resettlement options, with cash compensation potentially offered as an alternative subject to certain conditions.
 - g. Compensation for residential houses and other immovable assets is either in kind (resettlement house of better standard), or, if in cash, based on the full replacement value of assets.
 - h. Cash compensation for lost assets is at full replacement value, i.e. market value plus transaction costs.
 - i. Affected livelihoods will be restored, as a minimum, and preferably improved, and living conditions of relocated households will be improved.
 - j. 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.
 - k. The RAP implementation and outcomes will be monitored and evaluated and reported as part of a transparent process involving independent parties.
 - l. An effective and responsive grievance mechanism will be implemented and will be independently audited at regular intervals.
 - m. PAPs and host communities will be engaged, informed and consulted during the whole course of RAP development, implementation and evaluation.

3.2 KEY DEFINITIONS AND PRINCIPLES

3.2.1 Categorisation of Displaced People

98. Physically Displaced People are those who are physically displaced (i.e. who will lose their residence and will have to be relocated to another place). Typically, physically displaced peoples' livelihoods are also affected.
99. Economically Displaced People are people who do not have to be relocated but whose livelihoods are affected, including for example people who lose either their fields/plantation or access to them, seasonal agricultural labourers working on land owned by someone else, and people who run a business whose activity is affected by the Project.

3.2.2 Interdiction Zones, Restriction Zones and Cut-Off-Dates

3.2.2.1 Interdiction Zones

100. Interdiction Zones are areas that become inaccessible to third parties as a result of the Project. They contain and include:
- The direct footprint of any mining, quarrying or industrial facilities such as the crushing / processing plant, mine pits, quarries, and borrow pits, haul roads, waste rock and topsoil storage facilities, landfills, parking areas, warehouses, fuel depots, housing areas, etc.;
 - A buffer designed around above mentioned facilities, which is meant to ensure safety of both the facilities and third parties; the width of this buffer is dependent on the type of activity /installation in question and can be anywhere between 25 m and 800 m (for example ANAIM requires buffer zones along rail tracks of 25 m in width, while risks associated with blasting can require buffer zones of up to 800 m depending on conditions etc.). Buffer zones will be reviewed on a case-by-case basis for each type of facility/activity and associated environmental, health, safety and security issues as highlighted in the SEIA and SEMP;
 - Land which has been compensated and cleared of all people through the resettlement process.
101. Interdiction zones are ideally fenced and/or demarcated and patrolled. All land within interdiction zones is occupied by GAC on a permanent basis until decommissioning and closure. No community presence or activity of any kind is allowed within Interdiction Zones.
102. It is the responsibility of GAC to ensure that boundaries of such Interdiction Zones are properly publicized and visible such that no permanent dwelling and/or no agricultural fields are established, as the case may be. GAC will monitor Interdiction Zones to ensure that nobody settles there permanently and will notify any unlawful settlers (with the full involvement of local authorities) that they are not authorized to live, farm or otherwise be present in the Interdiction Zones.

3.2.2.2 Restriction Zones

103. A Restriction Zone is established in areas that the Company considers occupying within a certain timeframe but not immediately, or in cases where alternative designs of the Project are considered. Restriction Zones are generally established as a first step before the further establishment of a permanent Interdiction Zone. While community access, including residing and farming, is not prohibited immediately, a Cut-Off-Date is established, a census is conducted, and certain activities are prohibited or restricted (e.g., building new houses, expanding fields or starting new fields, etc.). Restriction Zones will generally be established in areas that the Company has earmarked for occupation within three years or less. Residents will not be relocated or otherwise compensated

immediately but a census will be conducted to establish a Cut-Off and freeze eligibility. Before residents are compensated or relocated, an Interdiction Zone has to be established with associated notification to the residents.

3.2.2.3 Cut-Off-Date

104. The Cut-Off-Date defines eligibility for entitlement to compensation for impacts and protects the company from opportunistic compensation claims. After public consultation meetings and widespread communication of the Cut-Off-Date (which must involve local authorities), only individuals and assets identified during the household census and asset inventory are entitled to compensation at the time of resettlement. Affected households/communities are additionally informed/reminded of the 'Cut-off-Date' and associated restrictions when their census forms, summarizing all assets inventoried, are presented for their review and signature per the process outlined in Figure 3.2, below.
105. The Cut-Off-Date is the date on which the census is carried out in a particular community or area. A rapid inventory (pre-census) may be undertaken in specific areas prior to the census and triggers the Cut-Off-Date.
106. Where buildings are constructed, expanded or significantly improved (i.e. grass roofs replaced with corrugated steel roofs) during the time the census is conducted and after the pre-census these are not taken into consideration.
107. Community members who claim that they are legitimately entitled to compensation but were not included in the census can file a grievance through GAC's Community Complaints System CCS (see Section 5).
108. Census data is only considered valid for a maximum period of three years after the Cut-Off-Date and should be updated thereafter as required. Accordingly, Restriction Zones are valid only for three years. Any new buildings, fields or inhabitants must be included in the new census and are fully eligible for compensation.

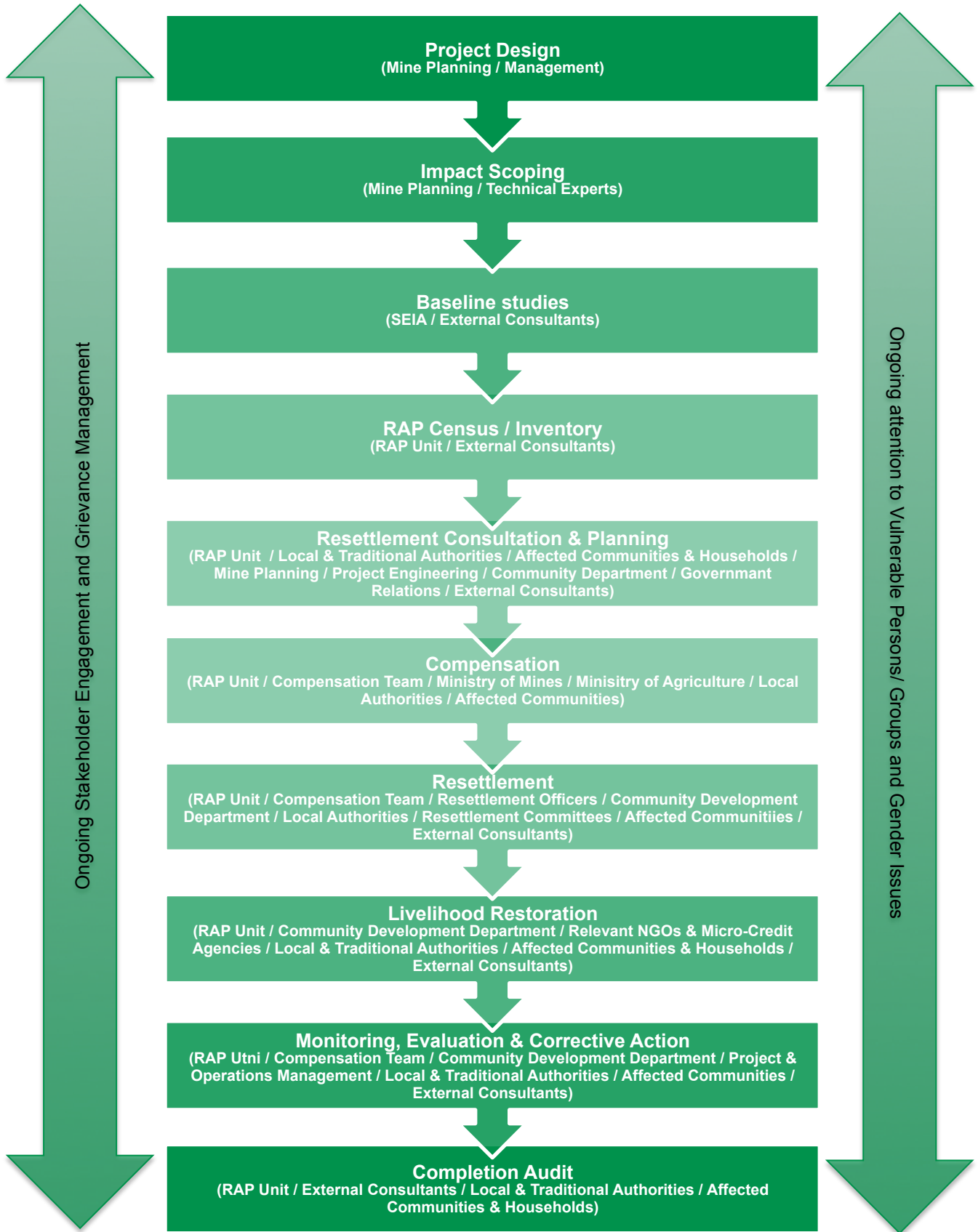
3.3 OVERVIEW OF THE RESETTLEMENT PROCESS

109. This section provides an overview of land access, compensation, resettlement, and livelihood restoration steps and processes.
110. The figure below shows the nine primary steps and processes involved in accessing land within GAC's Concession and Exclusion Zone(s) including resettlement, compensation and livelihood restoration, as well as stakeholder engagement/grievance management and vulnerable person/gender issues, shown as on-going commitments below:
 - a. **Project Design:** This process relates to the identification of the Project footprint on land, and associated optimization of individual Project components that impact land or land use and can result in economic and/or physical displacement. All efforts are made to minimize impacts, including changing project design where technically and economically feasible, in order to avoid or minimize displacement.
 - b. **Impact Scoping:** This takes place prior to, during and after project design, and identifies potential impacts on land and communities, including potential host communities, so that efforts can be made to reduce these where possible. This should include (where feasible): changing the placement and/or design of key infrastructure including plant facilities, access routes and haul roads; avoiding sites of cultural significance; reducing economic displacement; and avoiding or minimizing physical displacement. Impact scoping includes activities and processes involved in:
 - i. The preparation of SEIAs (and addenda) for Project components

- ii. The development of specific Resettlement Action Plans for such Project components;
- iii. Temporary and/or permanent land take for specific areas of land required during project operations (i.e. exploration and geological survey activities, expansion of haul roads or access routes, development of new project infrastructure required in the course of project operations).
- iv. Impact scoping can involve external consultants and/or internal resources, depending on the magnitude of impacts. Scoping of displacement impacts can be part of a formal, planned process (SEIAs), or be carried out on an ad hoc and as required basis, but in either case it must always include consultation with affected people and communities.

Figure 3.1: Land Access / Resettlement Process

Note that these steps are not necessarily conducted in the order shown below and some may be undertaken concurrently rather than successively.



- c. **Community Social Baseline Studies.** In addition to the data collected via the individual household census and asset inventory (see next step), a Community Social Baseline Study is conducted on the basis of multiple tools, including a household questionnaire with a statistically significant sample of affected households and qualitative methods such as focus groups and key informant interviews. On the GAC concession Social Baseline studies were conducted in 2004 as part of the initial SEIA and again in 2014 for the project and SEIA addendum relating to project redefinition. Note that the social baseline is generally conducted in the same exercise and concurrently with the census described in the following step.
- d. **Individual Household Census and Asset Inventory:** Once the footprint of the redefined Project and associated Mining Plan is known with reasonable accuracy (under each new phase), the process of preparing a RAP begins. This involves a detailed household census and an inventory of affected assets. This is usually concurrent with the Community Social Baseline surveys mentioned above. The purpose of both is to create an accurate baseline of potentially affected households living or working in the area and of the existing assets (houses, infrastructure, improvements to land, etc.). During this step, a household questionnaire is administered to every affected household and data on livelihoods are collected. Each household must sign off on the inventory of its assets in the presence of GAC staff and consultants, local officials and community witnesses. The census is the basis for eligibility for compensation, resettlement and/or livelihood restoration support. The start of the census and asset inventory is the Cut-Off-Date, and an Interdiction Zone is established, as well as Restriction Zones if warranted. Unauthorized activities taking place in these Zones after the Cut-off date are ineligible for compensation or resettlement/livelihood restoration. The resulting analyses provide the information for the phase-specific Resettlement Action Plan and serve as the basis for evaluating the restoration of post-resettlement livelihood restoration. During this step, vulnerable households are also identified.
- e. **Resettlement Action Plan:** GAC develops phase-specific or area-specific Resettlement Action Plans, for example for each new exploitation phase that requires economic and/or physical displacement, or for specific areas where displacement may be warranted for safety, security or other reasons. All RAPs are developed in accordance with the principles and guidance outlined in this LACRF.
- f. **Compensation and Allowances:** This LACRF defines the principles and processes, which need to be followed in order to provide appropriate compensation to individuals, households and communities affected by the Project. Phase-specific RAPs define and describe compensation rates to be paid and describe PAP eligibility and entitlements. The provision of compensation and allowances must occur prior to impacts taking place.
- g. **Replace Land/Resettle PAPs:** This process takes place after the 'Cut-off-Date' and associated census once eligibility and entitlements have been established for all affected households/individuals. Replacement land is identified and secured through a process of consultation and negotiation with affected communities/ households as well as with host communities. Once resettlement sites have been agreed, resettlement housing is constructed, PAPs are moved into new housing, and any other RAP commitments are implemented.
- h. **Livelihood Restoration:** Livelihood restoration activities generally have to continue for several years after the initial impact to ensure that livelihoods are sustainably restored or enhanced over the long-term. Each RAP defines specific livelihood restoration commitments within the general framework outlined in this RPF, as well as associated timeframes, budgets, and implementation arrangements.

- i. **Monitoring and Evaluation:** The initial social baseline study and asset surveys provide the basis for assessing impacts of land acquisition on individuals, households and communities as well as the relative progress and outcomes of livelihood restoration measures. GAC undertakes ongoing monitoring of people affected by physical and/or economic displacement. In addition, GAC hires an independent resettlement expert to conduct regular independent completion audits of GAC's implementation of their RAPs based on results of monitoring. Only once this expert confirms that PAP living conditions and livelihoods have been, at a minimum, restored (and preferably improved) to their pre-resettlement level can a phase specific RAP be deemed complete and GAC's obligations towards resettled households/communities end.
- j. **Completion Audit:** GAC engages an independent resettlement expert to conduct regular independent completion audits of GAC's implementation of their RAPs based on results of monitoring. If the assessment reveals that key objectives of the RAP were not achieved, remedial measures shall be developed to remedy the situation. Only once the independent expert confirms that PAP living conditions and livelihoods have been, at a minimum, restored (and preferably improved) to their pre-resettlement level can a phase specific RAP be deemed complete and GAC's obligations towards resettled households/communities end.

3.4 RAP SURVEY PROCESS

111. The RAP survey identifies the social baseline of affected communities and people as well as the inventory of affected immovable assets and associated people. Please refer to the figure below for an overview of this process. The survey takes place prior to, or at the time of, the establishment of an interdiction or restriction zone. GAC usually employs a private contractor to supervise the survey process, and to develop a Resettlement Action Plan (RAP) if warranted. The private contractor is typically accompanied by GAC RAP Unit members, leader or members of the community, as well as Government representatives (representatives from the Sub-Prefects office, including Technical Committee members such as agriculture, environment etc., the Mayor's Office, District Presidents, Chef de Quartier, etc.). Only assets, people and livelihoods inventoried during the survey are taken into consideration for resettlement and other compensation measures. In order to gather baseline information on the affected households and to understand / assess the contextual socio-economic conditions (including access to services, cultural sites, resources, etc.) socio-economic surveys and focus group consultations are conducted (see section 3.4.3 below).

3.4.1 Pre-Census

112. The RAP survey, typically including a preliminary rapid pre-census, is undertaken at the start of RAP operations to demarcate the area identified for resettlement/ land take and to reduce the risk of opportunistic influx. All structures are numbered and marked with paint and the status of buildings under construction is noted and pictures taken. It includes a field inspection, a topographic survey, mapping of the boundaries of each property and the collection of information relevant to the right of property or possession for each household, in order to maintain an impartial process during the household census and asset inventory. A pre-census is usually undertaken in the shortest timeframe possible (1 – 2 days) in order to prevent people moving into the area or building new structures. In the case where buildings are initiated during the time the census is conducted and after the pre-census these are not taken into consideration. In order to gather baseline information on the affected households and to understand / assess the contextual socio-economic conditions (including access to services, cultural sites, resources, etc.) socio-economic surveys and focus group consultations are conducted (see Section 3.4.3 below).

3.4.2 Census and Inventory of Affected Areas

113. A more detailed census of the affected area is then undertaken shortly after the pre-census and includes the collection of detailed information for each household, asset inventory, and focus groups for specific interests (i.e. women, farmers, traditional leaders, business men, tenants, etc.). A technical file is prepared for each affected person or household. The file includes the following information:
- a. Name of owner/occupant of land and/or of home;
 - b. Identification document (whatever document is available) for all residents;
 - c. Full name(s) of any spouse(s);
 - d. Full name(s) of any children;
 - e. Names of other members of the households, including tenants (paying and non-paying);
 - f. Ages and marital status of all residents;
 - g. Occupational and educational status of all members of the household;
 - h. If farmers, years working the plot of land;
 - i. Data on income and revenue sources;
 - j. Photographs of head of household and other residents (if available);
 - k. Contact information
114. For the **asset inventory**, the following information is collected:
- a. Property location and GPS coordinates;
 - b. Property description;
 - c. Land tenure information including, if available, title deed, bill of sale, customary agreements;
 - d. Property characteristics (cultivated land, fallow land, urban land) and types of crops grown;
 - e. Measurement of land and other productive assets, including count of perennial crops (like fruit trees);
 - f. Inventory of other assets including construction materials and infrastructure improvements to the land;
 - g. Any previous commercial and official appraisals;
 - h. Photos of the property;
 - i. Agreements with owners (if residents are tenants).
115. To ensure that households are able to continue with their agricultural activities without experiencing any loss or prejudice, non-perennial crops to be compensated in the event of land-take or resettlement are not necessarily surveyed at the time of an initial household census, but rather as close to the time of displacement and resettlement as possible. Compensation for lost crops also takes into account the loss of part or all of a planting season, depending on the timing of the land acquisition.
116. Communal / natural resources and user access/ rights are mapped, understood and compensated for accordingly.

3.4.3 Household Socio-Economic Survey

117. The household survey takes place at the same time as the census and asset inventory in order to establish a socio-economic baseline of affected households. It complements the Community Baseline surveys that may have been carried out at the time the SEIA but adds greater depth and detail and provides individual details that are not captured at the SEIA stage. All households that are physically displaced must be included in this survey at 100%. For households that are economically displaced, a sample can be drawn provided it ensures 95% confidence for 5% margin of error. For smaller groups (less than 100), drawing a sample makes no statistical or economic sense and 100% of households are surveyed.
118. Questionnaires focus on income sources and demographics relevant to understanding household livelihoods. The resulting analyses provide the background for the site-specific Resettlement Action Plan. Any livelihood specificities in the area being considered are taken into consideration through adaptations to the entitlements. A sample questionnaire has been prepared by GAC and should be used on all similar exercises with minor variations.

3.4.4 Verification of Status

119. Verification is conducted with community representatives. In cases where individuals or households are not titleholders of their properties and have customary ownership rights, these rights and the boundaries of plots are verified during the asset survey with village representatives or the relevant Resettlement Committee if it has been established at the time of the survey. This verification process also applies to seasonal farmers, non-resident property owners, tenants (paying and non-paying), and informal occupants. Census forms are reviewed with each Project Affected Household and their signature is sought to confirm that they agree with the identification, description and counts. To the extent possible, both spouses sign the form, in the presence of witnesses, who typically include a local government official, a member of the Resettlement Committee or other community representative, and a GAC representative. If the household is classified as a 'single headed household', then only that head of household needs to sign the form, again in the presence of witnesses.

3.4.5 Establishment of Database

120. The information that is collected through the identification of ownership process is entered into the Borealis Information System in order to track and manage entitlements for specific RAPs and also for compensation payments relating to land-take and damages. It is also used to carry post resettlement monitoring of households and PAPs.

Figure 3.2: Overview of RAP Survey Process



4. CONSULTATION AND STAKEHOLDER ENGAGEMENT

4.1 GAC'S STAKEHOLDER ENGAGEMENT PRINCIPLES

121. In conformance with Guinean legislation and international best practice, (including IFC Performance Standards and AfDB Integrated Safeguards System,), GAC endeavours to undertake consultation in ways that give affected communities timely opportunities to understand the impacts of the project on their lives and to express their views and concerns freely. GAC undertakes to consider and respond to these views, to the extent possible.
122. GAC implements a consultation process that:
- a. Is free of intimidation or coercion;
 - b. Allows community members to participate freely and without cost in decisions that directly affect them; and
 - c. Provides timely disclosure of information in ways that are relevant, understandable and accessible to affected communities and individuals.

4.2 KEY AREAS WHERE INFORMATION AND FEEDBACK ARE REQUIRED

123. Key information to be conveyed to Project Affected People includes:
- a. Cut-Off-Dates and rules applying to Interdiction and Restriction Zones;
 - b. Eligibility rules;
 - c. Entitlements, including compensation rates and resettlement entitlements;
 - d. Grievance procedures.
124. Key issues where feedback from Project Affected People is sought include:
- a. Selection of resettlement sites;
 - b. Planning of resettlement sites and design of resettlement housing;
 - c. Entitlements, including compensation rates and resettlement entitlements;
 - d. Livelihood restoration options;
 - e. Feedback on grievance mechanism and RAP processes.

4.3 STAKEHOLDER IDENTIFICATION

125. A Stakeholder Engagement Plan has been produced by ERM and INSUCO in October 2014 and updated in April 2015 as part of the SEIA. It presents an overarching identification of GAC stakeholders on the mining concession and associated project areas, as well as regional and other stakeholders.
126. As resettlement on the GAC concession is envisaged to take place in a phased approach over a 20 year time-frame, each phase-specific RAP requires additional stakeholder identification and specific stakeholder engagement planning, which may be reflected in dedicated documents or not, depending on the magnitude of impacts.

4.4 KEY CONSULTATION AVENUES

4.4.1 Resettlement Committees

127. A Resettlement Committee is established for each new RAP, and in each community that is affected by physical and/or economic displacement. It is constituted through preliminary discussions with the Chef de Village (if a rural area) or Chef de Quartier (if an urban area) at the time of preparing the phase specific RAP. The Resettlement Committee is comprised of representatives from different segments of the affected community. While the ultimate decision on selection and appointment of committee members lies with the affected community, GAC seeks to ensure that the Committee includes:
- a. A representative proportion of typically underrepresented groups such as women, youth, etc.
 - b. Representatives from key interest groups as relevant (i.e. business owners, farmers, fishermen, economically displaced households, etc.)
 - c. At least one customary authority figure such as a Chef de Terre, well-regarded imam, well-regarded elder or lineage chief, or similar.
 - d. Other trusted community members.
 - e. Generally, the Chef de Village or Chef de Quartier, who often serves as the committee's Chair or President.
128. The Committee and/or its members assist GAC and/or its consultants in the following tasks:
- a. Conducting household census and asset inventory, identifying and verifying ownership, particularly customary land owners/users;
 - b. Helping in publicizing the existence of an 'Interdiction' or 'Restriction Zone' once the Cut-Off-Date has been established;
 - c. Assistance in identifying and validating resettlement site locations and visiting them during the RAP preparation period to advise on selection;
 - d. Participating in the allocation of land at resettlement sites;
 - e. Advice on resettlement site planning and resettlement housing design;
 - f. Witnessing compensation payments;
 - g. Identifying vulnerable households in the community; and
 - h. Receiving and conveying grievances, and helping to resolve community disputes relating to resettlement and/or compensation.
129. GAC indemnifies committee members who participate in meetings (called by GAC) to compensate for the cost of transport and lost time. Committee members will be compensated at a set daily rate, reviewed annually and approved by the GAC executive manager responsible.

4.4.2 Host Community Committees

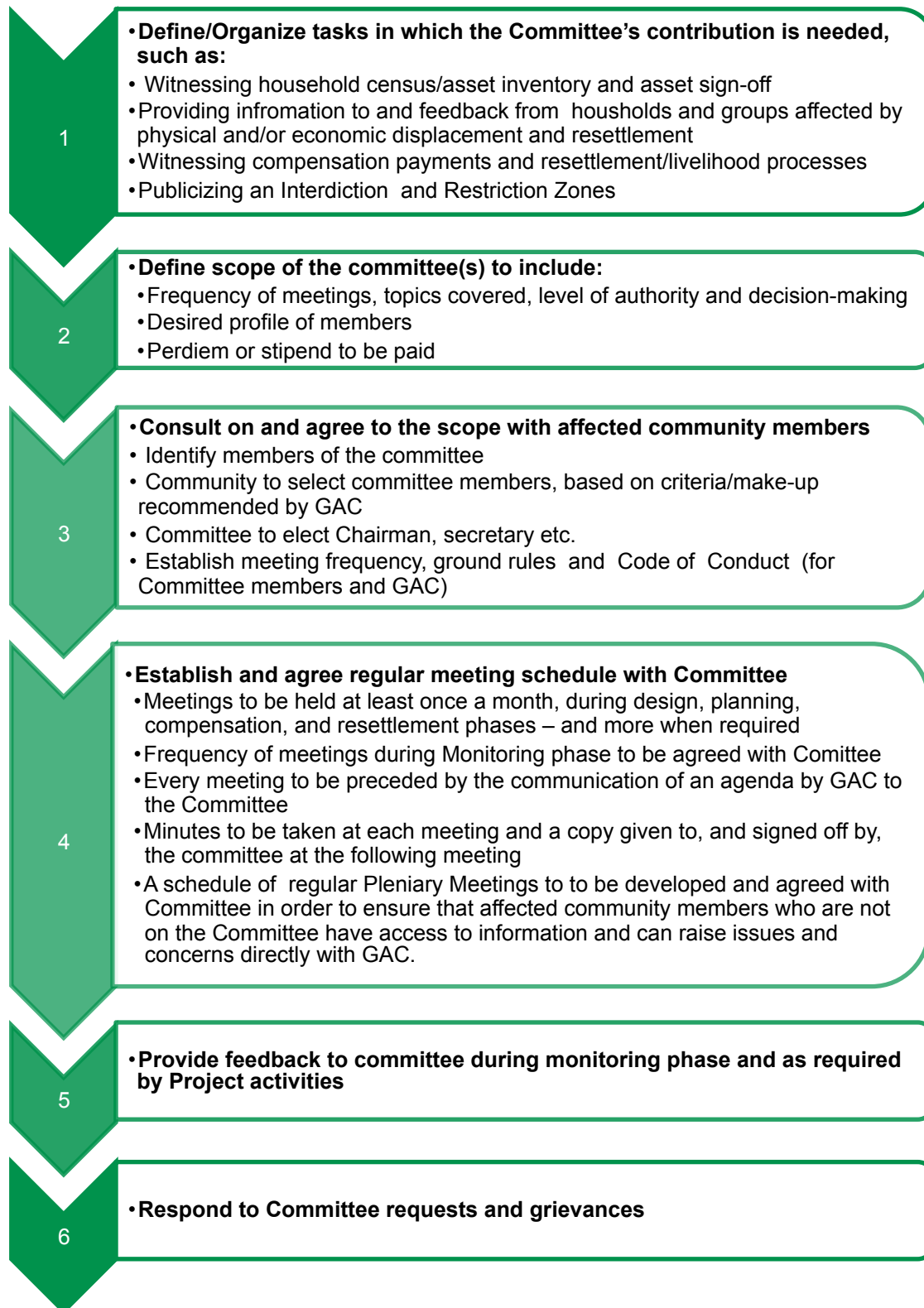
130. Where residents of a displaced village or neighbourhood are relocated to or close by an area where others are already living, a Host Community Committee is established as per the procedures outlined below (Section 4.5). The function of this committee is to discuss, take into account and help resolve issues that might arise from the additional demands on infrastructure and other public resources that would result from resettlement.

131. Impacts on host communities (including resource and cultural conflict) are mapped and assessed internally and through consultation with the affected communities, as well as local and traditional authorities. All consultations with host communities and relevant stakeholders will be documented and shared with the committee.

4.5 PROCEDURES FOR ESTABLISHING CONSULTATION COMMITTEES

132. For all consultation committees described above, a similar procedure is followed to set up and work with a consultation committee, as shown in figure 4.1 below.
133. Feedback and information on all RAP activities, including the establishment of resettlement committees, are communicated to the relevant local authorities (Sous-Préfet, Mayor) and their assistance sought in avoiding, mitigating and resolving any community conflicts that may arise over the course of the resettlement process.

Figure 4.1: Consultation Committees Process



4.6 DOCUMENTATION AND REPORTING FOR STAKEHOLDER ENGAGEMENT

134. Project personnel (RAP Unit and Community Liaison Officers within the Community Department) are the primary contacts of the committees, affected and host communities at large, local authorities, and the affected people. They coordinate meeting schedules, and ensure that information is transmitted to the committees and vice versa.
135. At each meeting committee members sign an attendance sheet. Minutes of all formal consultation proceedings are also signed-off by the Committee Chairman and/or Secretary.
136. For each meeting, the Community Department, and in particular RAP and CLO Units, maintains records in the Borealis Information Management System. Information that is captured includes, at a minimum: dates of key meetings (and if available, names of all attendees or scans of attendance sheets); GAC Personnel present at the meeting; key issues and concerns; outcomes and commitments made; and any follow-up actions to be taken with allocation of responsibilities.
137. For each on-going RAP process, the Community Department reports monthly to GAC Management on the following:
 - a. Types and numbers of consultation meetings held;
 - b. Key commitments made and status of implementation of such;
 - c. Notable changes or additions to stakeholders, particularly changes in the composition of resettlement committees or attendance at community/public meetings;
 - d. Key issues that need to be brought to the attention of GAC Management.

5. GRIEVANCE MANAGEMENT

5.1 COMMUNITY GRIEVANCE POLICY

138. As part of its ongoing operations, GAC has established a Community Complaints policy (see document 900-C-CPD-00015 (Rev 1) "Managing Community Complaints".) as a formal and documented process to receive, assess, record and resolve grievances concerning any aspect of the performance or behaviour of GAC, its contractors, sub-contractors or its employees. The policy, mechanisms and processes that are used to manage community complaints derive from and are in accordance with the relevant provisions of the IFC's Performance Standards, particularly PS 1 and PS 5 and AfDB OS 2. The objectives of the Community Grievance policy are to:
- a. Establish a consistent, transparent, accessible and fair grievance management process for individuals, households, and communities affected by the GAC Project.
 - b. Generate outcomes that are considered by all parties as realistic, fair, effective, and sustainable.
 - c. Promote and establish open and clear lines of community engagement around grievances.
 - d. Manage and reduce community and company risks by effectively addressing grievances so that they can be resolved before they escalate into larger conflicts.

5.2 COMMUNITY GRIEVANCE MANAGEMENT – KEY PRINCIPLES

139. Key principles of the GAC community management process are as follows:
- a. cover all aspects related to complaints including appropriate remedies;
 - b. be easily accessible, well communicated and known to all stakeholders including individuals and communities affected by the project;
 - c. be simple to understand and use⁸;
 - d. allow complaints to be treated effectively, in a timely manner and to keep the complainants informed of the status and evolution of their complaint;
 - e. ensure a thorough, transparent and impartial investigation of the complaint;
 - f. respect the confidentiality and anonymity of the complainant if required/requested;
 - g. ensure that there is no risk of retaliation for complainants;
 - h. not exclude, nor negatively influence, the possibilities for the complainants to use other mechanisms available for the resolution of complaints and grievances including the judiciary system;
 - i. be used to inform company policy related to any areas of company operations that prove to present significant risk or damages for the community so that improvements can be made; and
 - j. be regularly monitored, assessed and updated to ensure continuous improvement in GAC's ability to respond to community grievances in an efficient and effective manner.

⁽⁸⁾ GAC's complaint policy is available in written format in French and is also available in pictorial format [see Figure 5.1]. Additionally it will be explained verbally in local languages by Community Liaison Personnel for members of the community who require this.

5.3 COMPLAINTS NOT COVERED BY THE COMMUNITY GRIEVANCE POLICY

140. The following types of complaints fall outside of the Community Complaints Policy and will be treated through recourse to other mechanisms, as described below:
- a. Complaints constituting criminal activity and violence - in these cases, the complainants should be addressed to the official judicial system;
 - b. Labour complaints for GAC Employees - a separate mechanism exists for these complaints, established following Human Resource Policy. In the case of a non-satisfactory outcome the complainant may take his/her case to the relevant Labour Inspectorate ('inspection du travail'); and
 - c. Commercial disputes relating to the execution of contracts, which belong in mechanisms for settling commercial disputes and/or the civil courts.

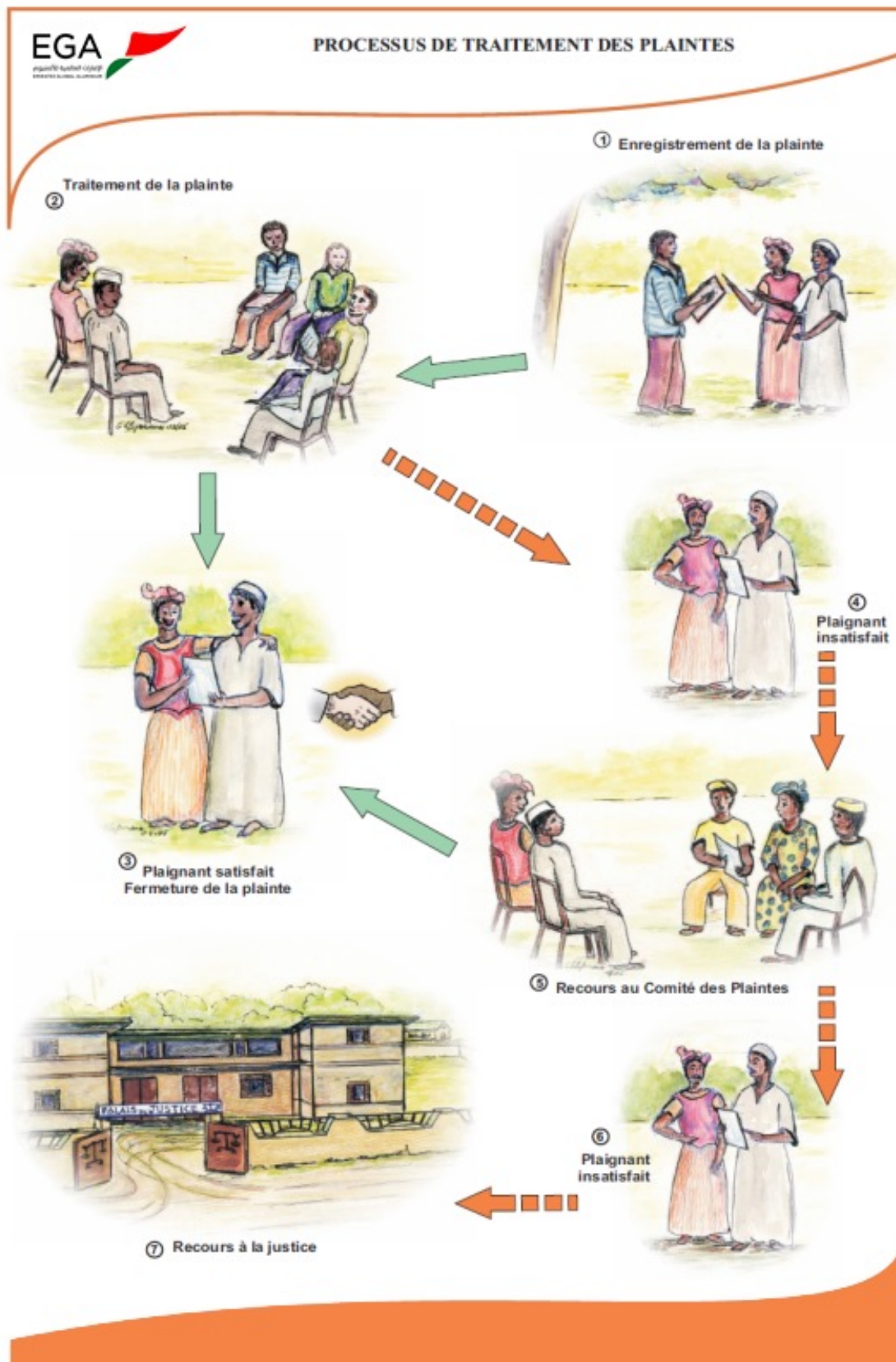
5.4 STAGES IN THE COMMUNITY COMPLAINTS PROCESS

141. Upon receiving a complaint in verbal or written form, GAC logs it in its information management system (Borealis), and provides the complainant with a written acknowledgement of receipt within seven calendar days. This acknowledgement of receipt includes a brief summary text explaining the complaint resolution process.
142. Unless impractical, GAC seeks to arrive at an initial proposal for the resolution of complaint within 30 calendar days of its reception. If this time limit cannot be met, GAC advises the complainant in writing that GAC requires additional time.
143. If the proposed solution is not accepted by the complainant, they (or a group of people, if it involves more than one person) may take their grievance to the Prefectural Complaints Committee, which seeks to analyse the case and propose its solution. For an outline of steps in the grievance management process, see Table 5.1 below.
144. All efforts will be made to resolve complaints within a maximum period of 30 days from the date on which they are received and to provide a formal, written response to the complainant detailing the outcome of the remedial actions. Where it is not possible to fully resolve a complaint within the 30 day time-frame, the complainant will receive written feedback regarding his/her complaint, (within 30 days) detailing the reasons that the complaint cannot be resolved within the specified time frame and outlining the next steps and actions to be undertaken by GAC and/or the complainant. Complainants will receive regular updates on the status of their complaint until its resolution.

Table 5.1: Principal Steps of Grievance Management Process

Step	Description
1.	Receipt of the grievance
2.	Completion of the grievance form
3.	Entry of the complaint into the grievance database
4.	Preliminary assessment of grievance: internal evaluation of the severity of the complaint
5.	Written acknowledgement of the receipt of the grievance within 7 calendar days. If key information is missing from the grievance, request for further information
6.	Investigation and resolution of grievance
7.	Response letter and registration in database. If the solution is accepted, resolution (including any payments) and closure of the case
8.	If the proposal is not accepted by the complainant, referral to the Prefectural Complaints Committee
9.	At any stage in the process, the complainant can resort to judicial measures

Figure 5.1: Community Complaints Procedure Poster for Community Use



6. COMPENSATION AND ENTITLEMENTS

6.1 KEY PRINCIPLES

6.1.1 General Principles

145. The key principles that GAC is committed to with regards to Resettlement and Compensation are listed above in Section 3.1.

6.1.2 Eligibility Principles

146. Eligibility principles are as follows:

- a. Assets, including structures and fields, and businesses are eligible for compensation as long as they were found to be affected at the time of the census and asset survey undertaken before the Cut-Off-Date.
- b. Eligibility to compensation for residential structures is at household level. This means that any compensation for affected residential structures is delivered at household level. Where a household includes a head and one or more spouses, formal consent of all spouses, including both males and females, is required before a compensation agreement can be accepted/finalised. This will apply to spouses identified in the census form, regardless of the formality of marriage.
- c. Land is State owned and as such is not eligible to compensation (other than compensation to the State if such was to be required by Government). However, usufruct rights in land, whether formal or customary, can be compensated. Eligible entities to such compensation vary depending on the usufruct or customary ownership regime (communities, lineages, households, individuals, as the case may be). Baseline surveys must determine the land tenure regime in affected communities such that compensation for land usufruct rights can be directed to the relevant entities (or in complex cases a combination thereof).
- d. Displaced people who occupy land without a recognisable legal or customary right to land are eligible for compensation of assets including structures and improvements to the land, and will be offered a choice of options for adequate housing with security of tenure.
- e. For crops and businesses, eligibility to compensation is at individual level. Spouse consent is not required.
- f. Any compensation is at full replacement value. Payment may be in cash or in kind at the time the assets need to be replaced, although priority will be given to 'like for like' and 'land based' compensation where possible.
- g. Compensation is delivered prior to impact(s) taking place, except in very specific cases (deceased or absentee right holder for example), which must then be thoroughly documented and subject to endorsement by the relevant parties (such as a community resettlement committee for instance).
- h. Compensation is always delivered directly to the beneficiaries, without any intermediary.

6.1.3 General Structure and Principles of Compensation

147. Compensation includes the following three components:

- a. **Compensation** is provided by GAC in conformance with Guinean law to offset loss of ownership or usufruct over certain assets (such as structures or crops). Compensation may be provided either in cash, or in kind:

- i. **'In kind' or 'like-for like' compensation** – GAC seeks to prioritize and promote 'like for like' or 'in kind' compensation wherever possible (for example the provision of a resettlement property to offset the loss of a residential house, or the provision of agricultural land to offset the loss of such). Where compensation is provided 'in kind' in the form of a resettlement property, GAC will endeavour to insure that this is of a higher standard than the original property. No cash compensation is provided. For agricultural fields and plantations land based compensation is prioritised (help in accessing new fields and plantations of a similar or better potential).
 - ii. **Cash compensation** - Where compensation is provided in cash, this will be at full replacement value as defined in Section 6.3 of the affected asset (which includes all transaction costs including labour cost and the cost and time required to re-establish the affected asset, i.e. trees, fields etc.).
- b. **Allowances:** generally in cash, allowances are provided by GAC to offset loss of rights other than ownership, costs incurred relating to resettlement activities (i.e. transport allowance) as well as disturbance and inconvenience experienced by PAPs (i.e. money to buy food in the time between planting and harvest, if crops were taken prior to the previous harvest.).
 - c. **Livelihood restoration benefits:** provided to support PAPs to restore livelihoods affected by Project land access activities. Livelihood restoration benefits are generally delivered in kind and/or in the form of various services, including training and capacity building, access to/priority for suitable jobs within the project.

6.2 ENTITLEMENTS

148. The principles governing entitlements for compensation/resettlement, as well as the entitlements for each type of impact are presented in Table 1.2 (Entitlement Matrix), below, with examples of entitlements for situations most commonly encountered in the Project area. Livelihood restoration benefits are described in further detail in Section 7. The headings of the columns have the following meaning:
- a. **Eligible Entity** – those to whom the given entitlement will be delivered;
 - b. **Eligibility Conditions** – the conditions that the asset or the right holder must meet for the entitlement to be delivered;
 - c. **Entitlement** – the compensation that will be delivered by GAC if the asset or right holder concerned is affected by GAC's activities.
149. For a full understanding for the Entitlement Matrix in respect for compensation for land, it should be noted that land rights in the GAC concession (as in rural areas within Guinea) have the following characteristics:
- a. From a strict legal perspective, any land outside of core urban areas is owned by the State; other entities can hold usufruct rights only.
 - b. Customary usufruct rights are recognized by Guinean law (the legal term is 'concessionaire') even where there is no specific titles or documents to ascertain them.
 - c. A piece of land may be simultaneously held in usufruct under different layers of customary land rights, with communities, lineages of the village founders, households, and sometimes individuals all exercising different rights over the same piece of land.
 - d. Generally, agricultural land is subject to two main layers of land rights:

- i. Community and/or lineage (usually through the village founders or the reigning noble clans, possibly hailing from another village as there are paramount and vassal villages);
 - ii. Households or individuals (including women and youth – particularly for smaller, more intensively farmed plots).
 - e. Similar arrangements may apply to residential land within a village, although household rights are usually preeminent over community or lineage rights in the case of residential land.
 - f. Fallow land and non-cultivated land usually goes back to the community pool.
 - g. Pasture land is normally held at community level with informal grazing rights conferred to herders (either living in the area or transhumant).
150. Different land rights apply depending on the location and use of the particular piece of land to be compensated. As part of its resettlement and compensation process GAC will recognize all applicable land rights identified during the census and compensate for these accordingly.
151. Table 6.1 below presents the entitlement matrix.

Table 6.1: Eligibility and Entitlement Matrix

Affected Asset	Affected Right or Interest	Eligible Entity	Eligibility Conditions	Entitlements
Land - Agricultural	Community or lineage customary usufruct	Community or Lineage represented by village chief, head of founding lineage or Council of Elders	Consensus on boundaries of community or lineage rights (with confirmation from adjacent villages where relevant)	Community compensation discussed with relevant traditional authorities and delivered exclusively in kind in the form of improvements to community and social infrastructure (for example building materials, road works, wells, village plantations or gardens, etc.)
	Household level land informal usufruct right	Households who have 'concessionaire' rights and are actively cultivating the land	Lineage consensus that the household holds usage rights to the affected piece of land. <i>AND</i> The plot has been cultivated during the previous season, or has been prepared for the current agricultural season. <i>AND</i> Household head and spouse(s) agree on compensation package.	Replacement land of similar size and agricultural potential allocated through the traditional community land allocation mechanisms within the boundaries of the village territory. OR Replacement land of smaller size but of greater agricultural potential (including for example in an irrigated area). <i>AND</i> Compensation in cash for any developments on the land at full replacement value (including land clearing, irrigation systems, ploughing, etc.) that would not be covered by the replacement package <i>AND</i> Livelihood Restoration Assistance (see Section 7)
	Individual level land informal usufruct right	Individuals who have 'concessionaire' rights and are actively cultivating the land	Lineage and household consensus that the individual (including female) holds usage rights to the affected piece of land. <i>AND</i> The plot has been cultivated during the previous season, or has been prepared for the current agricultural season.	Replacement land of similar size and agricultural potential allocated through the traditional community land allocation mechanisms within the boundaries of the village territory. OR Replacement land of smaller size but of greater agricultural potential (including for example in an irrigated area). <i>AND</i> Compensation in cash for any developments on the land at full replacement value (including land clearing, irrigation systems, ploughing, etc.) that would not be covered by the replacement package <i>AND</i> Livelihood Restoration Assistance (see Section 7)

Affected Asset	Affected Right or Interest	Eligible Entity	Eligibility Conditions	Entitlements
Land - Residential	Household usufruct right	Household head	Consensus that the household(s) actually holds usage rights to the affected piece of land	<p>Resettlement package including:</p> <ul style="list-style-type: none"> • Residential land of similar size and potential • Residential house of similar or better size, design and characteristics • Moving assistance • Livelihood restoration package <p>OR</p> <p>Resettlement package including:</p> <ul style="list-style-type: none"> • Residential land of similar size and potential • Cash compensation of the house at replacement value and assistance to self-build • Moving assistance • Livelihood restoration package <p>OR</p> <p>Cash compensation at full replacement value only in case physically displaced people can demonstrate that they have access to unaffected alternative housing.</p>
Land – Fallow savannah and bush (including natural resources found on the land)	Community customary ownership (usually through lineage elders or village founders)	Community represented by village chief, the head of the founding lineage or the Council of Elders	Consensus on boundaries of affected community land	Community compensation discussed with Council of Elders and community and delivered exclusively in kind
Land	Informal usufruct right	Individual or Household occupying land without a recognised customary or formal right, before the cut-off date	Consensus on boundaries of affected community land	Compensation for any structures or development on land , including an option to resettlement in adequate housing if physically displaced
Temporary loss of Land - land that is occupied temporarily	Community or lineage customary usufruct	Community or Lineage represented by village chief, head of founding lineage or Council of Elders	Consensus on boundaries of community or lineage rights (with confirmation from adjacent villages where relevant)	Community compensation discussed with relevant traditional authorities and delivered exclusively in kind in the form of improvements to community and social infrastructure (for example building materials, road works, wells, village plantations or gardens, etc.)

Affected Asset	Affected Right or Interest	Eligible Entity	Eligibility Conditions	Entitlements
(less than 3 years) and is returned to the land 'owner'/'user'	Household level land informal usufruct right	Households who have 'concessionaire' rights and are actively cultivating the land	Lineage consensus that the household holds usage rights to the affected piece of land. AND The plot has been cultivated during the previous season, or has been prepared for the current agricultural season. AND Household head and spouse(s) agree on compensation package	Replacement land –land is not replaced Compensation in cash , immovable assets found on the land at the time of land take (temporary shelters, land improvements [land clearing costs, irrigation systems, ploughing, etc.] are compensated, and the land user receives compensation in respect of crops that could not be harvested during the period of temporary occupation.)
	Individual level land informal usufruct right	Individuals who have 'concessionaire' rights and are actively cultivating the land	Lineage and household consensus that the individual (including female) holds usage rights to the affected piece of land. AND The plot has been cultivated during the previous season, or has been prepared for the current agricultural season.	Replacement land –land is not replaced Compensation in cash , immovable assets found on the land at the time of land take (temporary shelters, land improvements such as [land clearing costs, irrigation systems, ploughing, etc.] etc.) are compensated, and the land user receives compensation in respect of crops that could not be harvested during the period of temporary occupation.)
Land - Pasture	Community customary ownership (usually through village founders)	Community represented by village chief, the head of the founding lineage or the Council of Elders	Consensus on boundaries of affected community pasture land	Community compensation discussed with Council of Elders and community and delivered exclusively in kind
	Herder group grazing rights – if applicable	Herder group (if usage right has been conceded to such a group)	Community consensus that herders group actually holds grazing rights to the affected piece of savannah land	Replacement pasture land of similar size and potential allocated through the traditional community land allocation mechanisms AND Assistance to intensify animal husbandry if enough pasture land cannot be secured
Land - Forest	Formal ownership (not applicable in the Project area and included here for completeness)	State of Guinea	Documentation held by Service des Eaux et Forêts	Cash compensation (if applicable) per rates to be established by <i>Service des Eaux et Forêts</i> and negotiated with GAC

Affected Asset	Affected Right or Interest	Eligible Entity	Eligibility Conditions	Entitlements
	Community customary ownership	Community represented by village chief, the head of the founding lineage or the Council of Elders	Consensus on boundaries of the village territory with adjacent villages and affected piece of land actually falls inside these boundaries	Community compensation discussed with Council of Elders and community and delivered exclusively in kind
Perennial Crops <i>(including wild palm trees)</i>	Ownership right	Household or individual having grown the trees or recognised as owner of the wild trees	Community and/or relevant authorities confirm that the person(s) owns the crop/trees	Cash Compensation at full replacement value (value of product of the crop over one year + the cost of re-establishing the crop [seedlings, soil preparation, fertilizers, other] + lost income during the period needed to re-establish the crop)
Annual/Non-Perennial Crops	Ownership right	Household or individual having grown the trees or recognised as owner of the wild trees	Community and/or relevant authorities confirm that the person(s) owns the crop	Cash Compensation at full replacement value (Market value of lost crop or value of labour and other inputs invested into preparing a field if the crop is not in place)
Access to Fishing and Fishing based Livelihoods.	Common ownership, usually managed through lineage elders, village founders or (in the case of Kamsar) through a network of fishing associations, local authorities and government agencies.	Fisher groups: if usage rights over affected area have been formally or customarily conceded to such a group. Community household or individual whose main source of livelihood is identified (SEIA, RAP Census and socio-economic surveys) as being directly impacted by loss of, or restricted access to, fishing resources, including those not directly involved in fishing but whose livelihood depends mainly or partially of fishing resources (such as fishmongers)	Consensus on boundaries of fishing area / territory and confirmation that project impacts directly affect or impede access to fishing area, either temporarily or permanently.	Community compensation for lost resource discussed with relevant traditional authorities, local authorities, user groups and relevant government agencies. Compensation delivered exclusively in kind . Livelihood Restoration Assistance for households identified as being directly economically impacted by access to lost resource (see Section 7).

Affected Asset	Affected Right or Interest	Eligible Entity	Eligibility Conditions	Entitlements
<p>Structures – Residential complete and inhabited</p>	<p>Ownership right – Residents</p>	<p>Household owning and inhabiting structure</p>	<p>Community and/or relevant authorities confirm that the person(s) owns the structure. <i>AND</i> Asset survey confirms that the structure is inhabited and is inhabitable (at a minimum it must have a roof)</p>	<p>Resettlement package including:</p> <ul style="list-style-type: none"> • Residential land of similar size and potential • Residential house of similar or better size, design and characteristics • Moving assistance • Livelihood restoration package <p><i>OR</i></p> <p>Resettlement package including:</p> <ul style="list-style-type: none"> • Residential land of similar size and potential • Cash compensation of the house at replacement value and assistance to self-build • Moving assistance • Livelihood restoration package <p><i>OR</i></p> <p>Cash compensation at full replacement value only in case physically displaced people can demonstrate that they have access to unaffected alternative housing</p>
<p>Structures – Residential complete and inhabited</p>	<p>Ownership right - Landlords</p>	<p>Household owning but not inhabiting structure and renting it to others</p>	<p>Community and/or relevant authorities confirm that the person(s) owns the structure and has the right to rent it to others. <i>AND</i> Asset survey confirms that the structure is inhabited and is inhabitable (at a minimum it must have a roof)</p>	<p>Resettlement package including:</p> <ul style="list-style-type: none"> • Residential land of similar size and potential • Residential house of similar or better size, design and characteristics • Moving assistance • Livelihood restoration package <p><i>OR</i></p> <p>Cash compensation at full replacement value</p> <p><i>AND</i></p> <p>Moving allowance</p>

Affected Asset	Affected Right or Interest	Eligible Entity	Eligibility Conditions	Entitlements
Structures – Residential complete and inhabited	Non-ownership rights - Tenants	Household renting the property from others	Legitimate landlord confirms that the person(s) rents the structure. <i>AND</i> Asset survey confirms that the structure is inhabited and is inhabitable (at a minimum it must have a roof.	Cash compensation to the equivalent of the amounts required to secure a new rented dwelling, and up to 12 months rental <i>AND</i> Moving allowance
Structures – Residential incomplete and un-inhabited	Ownership right	Individuals or nuclear family heads	Community and/or relevant authorities confirm that the person(s) owns the structure.	Cash compensation at full replacement value
Structures - others	Ownership right	Individuals or nuclear family heads	Community and/or relevant authorities confirm that the person(s) owns the structure.	Cash compensation at full replacement value
Businesses	Ownership of the structure where business takes place	Owner of structure used for business (may be distinct from business operator)	Community and/or relevant authorities confirm that the person(s) owns the structure	Resettlement including land for re-establishment of the structure and structure reconstruction OR cash compensation at full replacement value and specific assistance for moving heavy equipment (if relevant/needed)
	Operation of a business	Operator	Community and/or relevant authorities confirm that the person(s) operates the business	Cash compensation for loss of income during the period of time required to re-establish the business on another site (typically 3 to 6 months) <i>AND</i> Cash compensation for non-transportable business assets at full replacement cost <i>AND</i> Livelihood restoration assistance
	Employees	Employees	Be an employee of the affected business	Cash compensation for loss of income during the period of time required to re-establish the business on another site (typically 3 to 6 months)

6.3 DESCRIPTION OF COMPENSATION ENTITLEMENTS

6.3.1 Community Compensation

152. Community compensation is intended to offset permanent loss of community land or any other community asset, regardless of compensation to households or individuals for household- or individual- level land use rights and regardless of land replacement and livelihood restoration activities. All villages losing land or other community asset, permanently to the Project are entitled to community compensation (as outlined in the Entitlement Matrix above).
153. Community compensation is exclusively in-kind in the form of replacement, permanent improvements or upgrades for communal infrastructure (such as wells, schools, access roads, markets, gardens, plantations, etc.), as applicable and in proportion to the area of land/asset removed from community use. Rates (in terms of budget of community compensation per hectare of community land lost) are established in respective RAPs.

6.3.2 Agricultural Land

154. No cash compensation is paid by the Project in relation to the loss of access to agricultural land on GAC's concession as it is the property of the State per Guinean law with exclusive usufruct rights granted to GAC in order to undertake its mining activities. However, GAC facilitates replacement of land taken by land of similar characteristics under a similar tenure regime, with PAPs assisted to identify and access either replacement land of an equal quality and size to that which was removed, or alternatively a smaller size of improved quality to that which has been taken.
155. Land take falls under two main categories:
- a. **Temporary:** This applies to land that is occupied temporarily and is returned to the land 'owner'/land user after a period of time of less than three years. In these cases the land is not replaced, immovable assets found on the land at the time of land take (temporary shelters, land improvements [land clearing costs, irrigation systems, ploughing, etc.] etc.) are compensated, and the land user receives compensation in respect of crops that could not be harvested during the period of temporary occupation.
 - b. **Permanent:** This applies to all land (over 10m²) that is taken permanently by the Project. Compensation includes all immovable assets found on the land (as described above). As mentioned above, GAC facilitates replacement of land taken by land of similar characteristics under a similar tenure regime, with PAPs assisted to identify and access either replacement land of an equal quality and size to that which was removed, or alternatively a smaller size of improved quality to that which has been taken.
156. Where there are improvements to land (such as fences, sheds, ditches, and the like), these will be compensated in cash at full replacement value to whomever built them (either the 'owner' or another user).

6.3.3 Crops

6.3.3.1 Annual Crops

157. Regardless of land ownership (i.e., whether they are concessionaires or tenants), farmers owning an affected annual crop receive compensation in cash for:
- a. The market value of crops that cannot be harvested prior to impacts to land. Whilst fields are identified at the time of the census, losses of non-perennial crops are surveyed and

compensation rates calculated shortly before land acquisition takes place (not at the time of the original household census and asset survey). NB: *New land cultivated after the Cut-Off-Date is not eligible to any compensation.*

- b. Tenants are paid the compensation value for the crop they have grown. However, as the land is held under customary concession rights by another person – who may or may not have been involved in the clearing of the land – the compensation may need to be shared with the land ‘owner’. This is intended to provide an incentive for land concessionaires to accept to rent their land out, thereby facilitating tenant access to land. Previous practice has been to allocate 90% of the value of crop compensation to the tenant (crop owner) and 10% to the land concessionaire (in the event that land is taken prior to harvest). This breakdown is reviewed and percentages are specified in each applicable RAP.
- c. In cases where the timing of land access is such that the farmer does not have time to replace land and farm in the following agricultural season, an additional season of the annual crops may be taken into consideration in the compensation calculation.
- d. Compensation rates are based on selling prices observed in the markets of Sangarédi and Kamsar (monthly market surveys carried out by GAC) and data collected from interviews with local farmers. They are updated on an annual basis and consulted upon with the representative of the appropriate Ministry at Sub-Prefectoral level (*Ministère de l’Agriculture, Ministère de l’Urbanisme et l’Habitat*) for verification and approval.

6.3.3.2 Perennial Crops

158. The calculation of the full replacement value for perennial crops (e.g., fruit trees) requires consideration not only of the production of the crop over one year, but also the cost of re-establishing the crop (seedlings, soil preparation, fertilizer, etc.), as well as the lost income during the period needed to re-establish the crop.
159. Perennial crops are inventoried at the time of the household census and asset inventory.
160. Market values of the produce for each of the most common fruit trees in the area (banana, mango, papaya, avocado, etc.) are collected monthly and rates are updated annually. Rates are calculated for the following stages of tree development:
 - a. Seedling
 - b. Young, non-productive
 - c. Young, productive
 - d. Mature

6.3.4 Residential Structures

6.3.4.1 Resettlement Houses

161. Physically displaced people who meet eligibility criteria (including both resident and non-resident homeowners) and who choose the replacement option are provided with a resettlement house of similar or better quality on a resettlement plot. The design of the houses will be developed in consultation with the project affected households and communities. All such consultations and community decisions, and preferences will be documented and integrated (where possible and relevant) into the RAP.
162. Resettlement houses and plots will have the following characteristics:
 - a. Houses provided are at least of a similar, and preferably better, quality and size

- b. Houses are designed to support healthy living and hygiene.
 - c. Every resettled household receives a Ventilated Improved Pit (VIP) latrine with double pit, regardless of the number of replacement houses.
 - d. For every resettlement house, a residential land plot is allocated. In urban settings (i.e. Kamsar) this is equal to the standard urban plot size. On the concession this is at least equal to the average size of the residential plots in original villages and is determined by each individual RAP.
 - e. Polygamous families, where the spouses lived in separate houses in the original village, may receive two resettlement houses if it is clearly established at the time of the census that they are separate households (refer to the definition of a household).
163. Physically displaced people who choose the cash option are not eligible to a resettlement property.

6.3.4.2 Cash Compensation for Residential Structures

164. Physically displaced people have an option between a plot and replacement house on a resettlement site, **OR** a plot and cash compensation at replacement value for their house and assistance to self-build. These options apply to owners of residential houses, regardless of their residence status (whether they live in the affected house or not). Only in cases when people can demonstrate that they have access to existing alternative housing are they able to choose a cash compensation only option.
165. **Traditional Structures:** Cash compensation of traditional structures are valued at full replacement cost. Quotations are obtained from local contractors for the construction of structures similar in general design and size but with improved features such as galvanized steel/zinc roofs. These valuations are updated as necessary during resettlement activities in order to account for inflation.
166. **Modern Structures:** Structures built from permanent materials are valued on a case-by-case basis by a certified valuer from the Ministry of Urban Planning and Housing (Boké Regional Directorate), based on a bill of quantities and measurements made in the field. Official valuers apply a depreciation coefficient to the final result of their calculation, but no such depreciation is applied in these cases in order to meet the requirement of full replacement value.

6.3.4.3 Tenants in Affected Houses

167. Generally speaking very few people rent houses or rooms on the concession, although as more and more economic migrants enter the zone in search of jobs and other opportunities this situation is changing. In Kamsar a large proportion of people rent rooms and houses. Rents are high and landlords often demand as much as one year's rent in advance.
168. Tenants and free of charge occupants of affected houses are entitled to a rental re-establishment allowance, equal to between 6 and 12 months of rent (depending on the prevailing rental conditions in the area) of a one room apartment of usual standard. This is multiplied by the number of rooms occupied in the affected dwelling by the affected household. Prices on the rental market in Kamsar and Sangarédi are monitored monthly by GAC. In addition, tenants receive the moving allowance.
169. In case a household declares to be renting or occupying a dwelling free of charge from relatives or other related individuals, these arrangements are thoroughly checked to avoid any risk of speculation. The definition of a "household" provided in the Definitions section is used for these checks (particularly separate "dwelling unit" with a separate entrance).

6.3.5 Non-Residential Structures

170. Non-residential structures including granaries, latrines, sheds and verandas of various kinds, etc. are compensated in cash at full replacement value. Standard rates are prepared by GAC and updated annually.

6.3.6 Public /Community Buildings

171. Community Structures and Public buildings such as schools, clinics, community meeting rooms, Mosques, churches and other community structures are replaced at a similar or better standard.

6.3.7 Businesses

172. Small businesses in the GAC concession area and in Kamsar typically include grain mills, carpentry workshops, metal working premises, retail stalls/shops and restaurants. GAC will provide compensation for any immovable structures. In addition, GAC provides allowances for the loss of income during the period required to re-establish the business (3 to 6 months) and the equivalent of 3 to 6 months' salary for any employees of that business.

6.4 CEMETERIES AND OTHER CULTURAL RESOURCES

173. Cemeteries are not to be displaced. Where displacing individual graves is absolutely unavoidable, each case is approached individually and in full consultation and negotiation with the affected communities, local authorities, imams or priests, and Council of Elders, as relevant.
174. On the concession there are various areas of land that are considered by the community to be inhabited by djinns and other spirits. In the event that the community requests a ceremony or other action to appease these spirits, GAC covers the cost of this as agreed with the Resettlement Committee or relevant traditional authorities with whom GAC has engaged to agree to the relocation of a culturally significant site. Generally, such ceremonies include an offering of a certain category of sacrificed animals. The cost of ceremonies is assessed on a case-by-case basis, based on reasonable requests by the community using the shrine or cultural site.

6.5 MOVING AND RESETTLEMENT TRANSITION ALLOWANCES AND ASSISTANCE

175. Resettled households are assisted during the moving process in the following ways:
- a. Each household receives a moving allowance in cash of the equivalent of USD 100⁹, subject to the household actually vacating the existing village/property by the date agreed upon by GAC; this allowance is intended to cover miscellaneous moving expenses such as the labour required to move personal belongings from the old place of residence to the new one and other costs associated with transitioning to a new location / home. The moving rate takes into consideration transportation costs, lost time costs and other incidentals relating to moving to a new house/location. It is calculated using market survey data collected monthly in the three local markets (Kamsar, Sangarédi and Boké). This rate is reviewed annually (along with all compensation rates) and adjusted periodically to reflect actual market rates and currency exchange valuations.

⁽⁹⁾ *Moving Rate at time of writing (2016).*

- b. Vulnerable households receive additional assistance in the form of GAC vehicles and staff helping with the move.
- c. GAC may, on a case by case basis, agree to provide additional assistance to PAPs to move to the new resettlement site (vehicles, staff, etc.) in addition to the moving allowance. For example, in the case where a household or business needs to transport an moveable asset of a size or nature where additional assistance, beyond what the PAP could reasonably undertake alone, is required; or where the transportation of that asset that could pose a risk to the PAP, other third parties or to the asset itself, if proper safety procedures/standards are not followed (i.e. generators, welding equipment and metalwork, livestock, etc.).
- d. Resettled households are allowed to salvage any building materials from affected structures (iron sheets, bricks, poles, and other carpentry components) within a specified time.

6.6 FISHING AND ASSOCIATED LIVELIHOODS

176. Project impacts to fishing grounds, landing sites, fishing vessel moving ability, or water quality with related effects on fish stock will be avoided, minimised, or mitigated by the Project, with compensation a last resort only for those residual impacts that cannot be avoided, minimised, or mitigated to an acceptable level.
177. If compensation is necessary, it will be based on reasonable estimates of losses for the period during which impacts are experienced. In the unlikely case that impacts would be permanent, compensation will be for a maximum of one year, with fishermen (and associated professions if relevant) assisted to transition to other sites or other sources of livelihood.
178. If compensation is necessary, and depending on the nature and magnitude of impacts, it will address not only individuals that are directly involved in fishing but also those whose livelihoods indirectly depend on fishing, such as fishmongers, helpers, etc...
179. The nature, significance, duration, and significance of impacts to fish stocks and fishermen's access to fishing will be determined by ESIA's. However, compensation that may appear necessary will be determined by RAPS. GAC shall organise that both exercises are adequately coordinated in that perspective.

6.7 PAYMENT PROCEDURE

6.7.1 Compensation Payments – Key Principles

180. The principles and provisions below are intended to comply with IFC and AfDB standards, provide maximum transparency to the compensation process and to provide maximum security to affected people in receiving and managing their funds:
 - a. Compensation is paid before impacts.
 - b. Compensation is calculated and paid in Guinean Francs (GNF).
 - c. Compensation is always paid in its entirety to the eligible recipient by the census. No compensation is paid to proxies except in cases mentioned in the next point
 - d. In cases where the eligible recipient identified by the census dies or cannot be found, GAC relies on a decision by the appropriate Justice authority to be able to pay compensation to another individual.
 - e. Payment of large amounts may be made in several instalments (particularly related to perennial fruit trees, which can reach fairly high amounts) to mitigate the risk of cash misuse

by people who are not used to handling significant amounts of cash, and to replicate lost income streams over a period of time.

- f. Any payment in excess of GNF 750,000 (or the dollar equivalent of USD 100) is transferred directly into a savings account in the name of the eligible person. These accounts accrue a modest interest, do not have withdrawal limits and do not bear management expenses.
- g. Affected people will be advised to open such accounts to limit robbery or embezzlement risks.
- h. In the case where eligible PAPs are not prepared to open such accounts they will be compensated by cheque which they can cash in Kamsar, Boké or Sangarédi.
- i. Payments of less than GNF 750,000 are made in cash.
- j. Amounts less than GNF 750,000 will be paid as a lump sum and amounts over GNF 750,000 will be paid in instalments up to a maximum of 10 instalments depending on the amount of compensation to be paid.
- k. Money management training and awareness programs are implemented for all PAPs with a specific focus on vulnerable people.

6.7.2 Compensation Rates

181. Compensation rates are based on full replacement value of the asset, which includes:

- a. **Market rate** + all **inputs** (including labour) needed to replace the asset + **cost of time** needed to restore the asset and associated income loss over that period of time (in the case of fruit trees this will be the income loss over the number of years it takes a seedling to reach the vegetative stage at which the tree was removed) + any associated **transaction costs**, where such are not covered directly by GAC.
- b. Market rates for each crop or asset, which are determined through monthly price monitoring in the markets of Boké, Sangarédi and Kamsar. Compensation rates are updated annually based on these market surveys.

182. Average yields for crops and fruit are based on information obtained from the Ministry of Agriculture and are validated periodically by the same.

6.7.3 Compensation Agreement

183. Each person eligible for compensation signs an agreement with the Project's authorized representatives (Compensation Team within the RAP Unit). This agreement clearly establishes both parties' commitments and must be witnessed by a credible witness from the community/local authority.

184. The compensation agreement specifies:

- a. The amount of cash compensation due and the number of instalments;
- b. Area of land to be replaced (as relevant);
- c. Livelihood restoration packages ; and
- d. Generally all entitlements, including allowances for moving, tenancy, business re-establishment, etc.

7. LIVELIHOOD RESTORATION

7.1 OVERVIEW

185. Livelihood restoration programs are implemented for people and households whose livelihoods are affected by project activities to ensure that livelihoods are improved or at least restored.
186. GAC monitors livelihood restoration programs and makes changes as necessary in order to ensure that the programs provide the expected benefits.

7.2 LAND BASED LIVELIHOODS

187. Livelihoods on the GAC Concession are primarily land based. As such a land based livelihood restoration package, which will be developed as part of a livelihood restoration programme, (developed and adapted to each specific RAP / RAP phase), is offered to all persons losing agricultural land to the Project. This consists of agricultural inputs (seeds and fertilizer), as deemed necessary, if the land replaced is of a smaller size or poorer quality than the land taken, and support and training by agronomists provided by GAC to improve agricultural practices and yields. Agriculture intensification is unavoidable to improve communities' resilience to increasing land scarcity and demographic pressure. Such programmes will be defined in details in respective RAPs and may include one or several of the following measures:
- a. Provision of selected varieties (more productive, with shorter, delayed or early cycle, or more resilient to drought);
 - b. Improved soil preparation techniques (use of animal traction, mulching);
 - c. Fertilisation (organic and mineral);
 - d. Changes to the crop mix, with focus on those with better marketability;
 - e. Review of the potential for new crops;
 - f. Post-harvest improvements (mitigation of post-harvest losses, storage improvements);
 - g. Market improvements (farmer groups, management training, better management of transport to regional and national markets).
188. Such programmes are best implemented by specialist NGOs with experience in Guinea Maritime. There is a few Conakry based organisations with such abilities and GAC shall seek to attract them into cooperating in such programmes.
189. For people whose livelihoods depend on grazing or other natural resources, similar programmes will be devised that allow to address any impacts to livelihoods. An exception will be made to charcoal production, which GAC will not support as it is an environmentally harmful activity.

7.3 FISHING BASED LIVELIHOODS

190. Where fishing based livelihoods are affected, fishermen will receive support to re-establish or improve their livelihoods. Such support may include, but not be limited to:
- a. Small equipment,
 - b. Access to credit,
 - c. Training,
 - d. Improvements to marketing, including improvements to the cold chain.

191. Support to livelihood restoration will address not only fishermen that are directly affected, but also individuals whose livelihoods may be affected indirectly, such as fishmongers and others.

7.4 EMPLOYMENT

192. GAC gives priority to PAPs for non-skilled employment opportunities (for both permanent and temporary jobs - within GAC as well as with its contractors) based on the principle of 'equal or better competence'. The Community Department:
- a. Develops binding recruitment procedures for Contractors;
 - b. Maintains up-to-date registers of all eligible PAPs/households that are distributed to all construction contractors and operations departments within GAC;
 - c. Provides assistance to contractors in recruiting PAPs;
 - d. Monitors compliance of GAC operations departments and contractors with agreed recruitment procedures, and generates quarterly indicators of PAP employment.

7.5 SUPPORT TO SMALL BUSINESS ESTABLISHMENT AND DEVELOPMENT

193. Through its Community Development Programmes, GAC develops economic development programmes for which PAPs, and especially women, are prioritized for inclusion. These may include but are not limited to:
- a. Food production and catering, and linkages with GAC's and GAC Contractors' catering needs;
 - b. Soap cosmetics and candle making, and linkages with GAC's housekeeping service providers;
 - c. Sewing projects, and linkages with GAC requirements for specialised garments;
 - d. Cashew nut production;
 - e. Salt production;
 - f. Micro-finance schemes.

7.6 SCHOLARSHIPS AND SKILLS DEVELOPMENT

194. Through its Community Development Programmes, GAC develops scholarship and vocational skills training programmes, as well as adult literacy and alphabetisation programmes. PAPs will be prioritised for inclusion in these initiatives.

8. RESETTLEMENT SITE DEVELOPMENT

8.1 GENERAL

195. GAC develops resettlement sites in line with applicable Guinean standards and international good practice. Sufficient space is allocated to streets, public squares, buildings and other public infrastructure (about 30% of the total residential and commercial space). GAC re-establishes infrastructure and public facilities. Infrastructure such as roads, drinking water, drainage, waste water collection and treatment, electricity, solid waste management and cellular or fixed telephone systems that might exist prior to resettlement in the project-affected communities are appraised as part of the compensation process and re-established or compensated to the relevant entity. The same applies to public facilities such as schools, health centres, administrative buildings, mosques and churches. These are re-established at resettlement sites in line with applicable Guinean standards, and at least to the same standard as prior to resettlement.
196. Potential impacts on host communities will be identified, assessed and mitigation measures developed to reduce impacts and potential conflict with resettled populations.

8.2 ROADS AND STREETS

197. Transportation infrastructure on resettlement sites are subject to Guinean regulations and standards and are expected to have the following characteristics:
- a. Access roads: laterite roads passable in all seasons.
 - b. Internal streets: laterite roads passable in all seasons.
 - c. Run-off water collection and erosion control to be accorded high attention, particularly during the first years after resettlement.
198. RAPs determine the characteristics of roads and streets required at resettlement sites, guided by the aforementioned standards.

8.3 UTILITIES AND WASTE MANAGEMENT

8.3.1 Water

199. An adequate and sustainable potable water supply is established in resettlement communities, based on either a piped scheme with stand taps, or drilled boreholes with hand pumps. The design for water supply is based on an average consumption per individual of 20 litres per day. Water access points are located no farther than 400 meters to the houses they serve, to the extent practical. The best-suited option is outlined in the site-specific RAP that is developed for each project-affected community. Consideration is given to the following in designing water supply systems:
- a. Outcomes of community consultation processes.
 - b. Service at original site.
 - c. Population and consumption requirements of the community.
 - d. Ground water availability at resettlement site.
 - e. Maintenance and management requirements versus the technical, economic, financial and organisational capacity of the community to take care of the system and ensure its long term sustainability.

200. GAC re-establishes existing or displaced waterworks infrastructure but resettled PAPs have to cover the cost of operating and maintaining these facilities. This message is disseminated clearly from the very beginning of the resettlement process so that communities can organize themselves in this regard. This organization is usually best done through the establishment of a Water Users' Committee, which is the formal custodian of the facility on behalf of its owner, the community as a whole. In specific cases, a 'grace period' or 'guarantee period' is established during which some aspects of the maintenance may be free of charge to the users. GAC assists the community in establishing and training the relevant committees, and generally in establishing sustainable management systems.

8.3.2 Electricity

201. In practice very few, if any, households on the concession have access to electricity. In Kamsar connections to CBG electricity supply do exist but are mostly illegal/informal connections. Where households do have access to electricity at their pre-resettlement location, and particularly where electricity is required for operations of certain businesses, electricity is re-established. The recurrent cost of electricity supply is paid for by the resettled household. GAC will not be responsible for any recurrent supply costs for electricity.

8.3.3 Waste Management

202. Human waste is disposed of in Ventilated Improved Pit (VIP) latrines at resettlement sites. These are equipped with a double pit for long term usability, and design and construction provisions are taken to avoid insect proliferation. Users are trained to VIP latrine use (no shower, no soap) and maintenance (how to empty one pit when the sludge has dried up while the other pit is being used).
203. Resettlement sites are equipped with a proper run-off collection and disposal system, which is sized and designed to accommodate the typical rain episodes of Guinea Maritime and to limit erosion and maintenance requirements. Resettled individuals are trained to maintain the drainage system.
204. Depending on municipal services available nearby, solid waste is either collected in skips if these can be collected and disposed of by municipal services, or disposed of in a suitable dump to be maintained by the resettled individuals. Intermediary collection points may be established if warranted.
205. All such services are to be taken care of by specific committees established within the resettled community. GAC assists with the initial establishment of sustainable facilities and with training. The recurrent cost of maintenance of stormwater drains, latrines and waste collection and disposal facilities is taken care of by the resettled communities through their relevant committees.

8.4 PUBLIC BUILDINGS

8.4.1 Schools and health facilities

206. GAC ensures that resettled people have equal or improved access to public services, and that relevant service standards are met. Schools and health facilities are replaced/established or expanded in the case that:
- a. They are directly impacted by land take activities;
 - b. If resettled households are moved significantly further away from their regular points of access to these facilities;
 - c. If existing neighbouring schools or health centres cannot absorb the additional population moving into the neighbourhood as a result of the resettlement GAC will either build new

schools or health clinics or enhance the capacity of existing facilities, if this is deemed appropriate;

- d. On resettlement sites developed for the integration of several communities where the number of households to be re-established is of a sufficient threshold to warrant this and the new site is not in proximity to existing education and health services.

207. Schools and health clinics will be established in compliance with applicable Guinean service standards and through consultations with community members, local government, GAC community development staff and consultants in order to meet the needs and development objectives of the community. GAC will only build a new health and educational facilities subject to the relevant authorities committing to provision of staffing and on-going operational costs of such facilities.

8.4.2 Churches, Mosques and Other Public Buildings

208. GAC will replace mosques, churches and other public buildings in the event that:

- a. They are impacted by land take in a particular community;
- b. In order to incentivize affected households to move to larger, unified resettlement sites (rather than the creation of smaller dispersed sites, of just a few households, across the concession), and insofar as such larger sites are socially acceptable, religious and other public buildings (including schools and clinics) may be built at these new sites, as deemed necessary and appropriate, through consultation with the community and local authorities.

8.5 SECURITY OF TENURE

209. Resettled individuals will receive security of tenure for residential land through mechanisms available in Guinean law. This typically entails the allocation of a '*permis d'occuper*' within the framework of a 'lotissement', which must be authorised by the local Urban Planning department (at Préfecture level, i.e. in Boké for the Project). GAC will take care of the required paperwork and cover any cost associated with granting resettled individuals with the proper documentation.

9. IDENTIFICATION AND SUPPORT TO VULNERABLE HOUSEHOLDS

9.1 IDENTIFICATION OF VULNERABLE HOUSEHOLDS

210. 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 resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits. In the context of GAC, vulnerable households include the following categories, particularly where they cannot rely on social networks, and insofar as they are affected by physical and/or economic displacement process:
- a. Households whose head or other members have a significant physical or mental handicap.
 - b. Households headed by children.
 - c. Female or single-headed households who live with very limited resources (e.g., landless households or people with very limited land).
 - d. Seriously ill people, particularly those living with HIV/AIDS and other chronic illnesses.
 - e. The elderly (the benchmark age is normally 60 but can be adjusted to the condition of the person).

9.2 POTENTIAL ASSISTANCE ACTIVITIES TO VULNERABLE HOUSEHOLDS

211. GAC's assistance to vulnerable households affected by land acquisition and resettlement includes the following measures:
- a. Identification of vulnerable households and identification of the cause and impacts of their vulnerability, either through direct interviews by a Project social worker and/or relevant CLO, together with the Resettlement Committee.
 - b. Identification of required additional assistance at the various stages of the process: participation in consultation process, negotiation, compensation, moving and integration into social programmes or groups, etc.
 - c. Monitoring and continuation of assistance after resettlement and/or additional compensation, if required.
 - d. Other specialized assistance, depending upon vulnerable households' requests and needs.
212. Specifically GAC assists identified vulnerable people in the moving process by providing them with transport services (their personal belongings are transported in GAC vehicles to the resettlement site). Vulnerable people are also specifically assisted through the impact identification (census) and compensation processes.

9.3 MONITORING OF VULNERABLE HOUSEHOLDS

213. GAC establishes a special monitoring program to assess the progress of assistance to vulnerable households during the resettlement process. This program seeks to augment other monitoring processes implemented during resettlement and led by the Resettlement Committee and key community members.
214. GAC monitors the status of households who were identified as vulnerable before relocation for three years after they have been resettled. In Year One, monitoring takes place on a quarterly basis and includes semi-annual interviews with all vulnerable persons. After Year One, annual interviews are

conducted for the following two years. Key information that is to be gathered and reported internally includes the following:

- a. Total number of identified vulnerable households per RAP
- b. Case-by-case census of vulnerable households
- c. Type(s) of vulnerability
- d. Type(s) of assistance provided
- e. Efforts to restore livelihoods, social networks and standards of living
- f. Vulnerable households who have been unable to restore livelihoods, social networks and/or standard of living

215. All data on vulnerable households are to be kept up to date in the Project’s database.

9.4 SUMMARY OF PROCEDURES FOR ADDRESSING THE NEEDS OF VULNERABLE HOUSEHOLDS

216. Resettlement Committees assist in the identification of vulnerable households and the definition of assistance activities. The following process takes place, as outlined in the following Table 9.1:

Table 9.1: Activities to Address the Needs of Vulnerable People

TASKS	
1.	Staffing: Designate and train responsible RAP Unit staff in charge of assistance to vulnerable households
2.	Refine vulnerable people criteria for each RAP (if necessary)
3.	Inform Resettlement Committee on their tasks with respect to vulnerable households and structure and guide the Committee’s role
4.	Define and finalize assistance entitlement for all households, including vulnerable ones
5.	Identify eligible vulnerable households: <ul style="list-style-type: none"> • Pre-screening: Develop initial list with Resettlement Committee and other parties as relevant • Screening: Assess in an interview with household at their home whether pre-screened households qualify as “vulnerable” and devise individualized assistance measures • Obtain approval in GAC for recommended measures • Finalize list and assistance measures with Resettlement Committee
6.	Communicate proposed measures to identified vulnerable people and amend if needed
7.	Provide assistance as appropriate at each stage of land acquisition or resettlement
8.	Monitor and evaluate to ensure that vulnerable households are restoring or improving livelihoods and standards of living, and if monitoring indicates that assistance is not achieving restoration of livelihoods and standard of living, reassess/retarget assistance
9.	Reporting: Provide information internally – and report externally as appropriate

10. GENDER ISSUES

10.1 PRINCIPLES

217. GAC is committed to ensure gender equity in entitlements and project benefits throughout the resettlement process, in line with IFC requirements. The Resettlement Action Plans must incorporate measures to ensure that women and men receive equitable compensation for assets and share equitably in the related livelihood support programs. Key principles that guide GAC's gender equity strategy comprise the following:
- a. Including women in the planning, decision-making, and compensation process during the resettlement of communities.
 - b. Promoting women's and girls' economic rights and opportunities through programs that build their capabilities and help them to build their livelihoods.
 - c. Ensuring that essential public services like health and education benefit women, men, girls and boys equitably.
 - d. Supporting vulnerable households, particularly female-headed households and widows, throughout the resettlement process.
 - e. Collecting and analysing gender-disaggregated data in the Project-Affected Area.
 - f. Ensuring that women's rights are protected in particular with regard to compensation for assets and ownership of property.

10.2 GENDER EQUITY PROCEDURES

218. Steps that GAC follows to ensure gender equity in GAC's compensation and resettlement processes include the following:
- a. Consult separately with women when making decisions about where resettlement communities will be located, how houses will be designed (especially kitchens) and how the location meets needs like access to resources (such as water or fuel), which might be particularly important for women.
 - b. Ensure that women are represented in all decision-making committees.
 - c. Ascertain ownership of affected assets in a manner that is sensitive to the rights of women, such that where both spouses are joint owners of the affected asset, they both are jointly eligible to GAC compensation entitlements.
 - d. In cases where families are going through a divorce, review the situation in a manner that is equitable to both spouses, involve the relevant resettlement committees, and restrict eligibility to those household members that were identified at the Cut-Off-Date, to avoid opportunistic attempts by more distant and unaffected relatives to benefit from compensation.
 - e. In situations where the inventoried head of household dies between the census and the actual compensation, restrict eligibility to those household members that were identified at the Cut-Off-Date, review the situation following traditional succession rules, involve the relevant resettlement committees, and ensure that the outcome is not disproportionately detrimental to female members of the household

- f. Consider the possibility to treat polygamous families, as separate households, and particularly where they are resettled consider the possibility of providing them with separate houses in line with the model followed in the original communities.
- g. Take account of gender in devising livelihood restoration packages that allow women to enhance their livelihoods and quality of life.
- h. Categorize female-headed households as vulnerable (unless they do not qualify).

11. MONITORING AND EVALUATION

11.1 OVERVIEW OF THE MONITORING FRAMEWORK

219. 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.
220. 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.

11.2 INTERNAL MONITORING

11.2.1 Overview

221. 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.
222. Monitoring takes place against the principles, commitments, activities, entitlements, timeframe and budget set out in PS5, OS2, this Framework and the relevant Resettlement Action Plan. The RAP provides details about the resettlement activities and inputs, such as constructing resettlement houses, acquiring replacement land etc. and also provides a description of expected short and long-term results. The monitoring process will check the progress against these established indicators and expected short-term results. Indicators are typically gathered on a quarterly basis. Quarterly reports (essentially quantitative) are collated, as well as more substantial yearly reports.
223. Monitoring will normally continue throughout the life of the project, even after the period of intensive resettlement activity.

11.2.2 Monitoring Process

224. 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 bi-annual – every two years – or annual).
225. 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.
226. 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.
227. 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.

11.2.3 Objectives and Aspects Monitored

228. The objectives and aspects to be monitored are linked to the key commitments made by the Project in the RAP. The monitoring process will measure whether inputs are delivered on schedule and as defined in the RAP including the following:
- a. Compensation for loss of land and crops;
 - b. Reconstruction of and compensation for loss of housing;
 - c. Reconstruction of cultural heritage sites and other forms of mitigation;
 - d. Restoration of livelihoods;
 - e. Restoration of social networks;
 - f. Support for vulnerable people;
 - g. Grievance processes.
 - h. As well as changes that may, or may not be directly related to project impacts including:
 - i. Changes in household socio-economic status
 - ii. Changes to local economy
229. The monitoring process will be structured to consider the following categories of project-affected people:
- a. Those who have lost land, agricultural, urban or non-productive rural land;
 - b. Those who have been displaced from pastoral land;
 - c. Those who have lost crops: subsistence crops, cash crops and fruit trees;
 - d. Those who have been economically displaced or whose livelihoods have been impacted;
 - e. Those who have lost structures or housing: resident owners, non-resident owners (i.e. rental properties), tenants and owners of temporary structures (i.e. shelters)

f. Host communities.

230. Monitoring indicators will be selected to address the specific contents of the entitlement matrix. Sample monitoring indicators, from which specific indicators can be developed and refined according to the circumstances, are set out below.

11.2.4 Monitoring Indicators

231. The monitoring indicators derived from the RAP entitlements matrix are the basis by which the resettlement process is measured. The monitoring process will continue to measure the same indicators until such time as the activity has been completed. The lists are presented in Table 11.1 and 11.2. below. The initial value of these indicators can be established from the socio-economic surveys included in the RAP census and from the baseline data that was collected from control communities (communities that are similar in nature and context to resettled villages but which have not experienced impacts).
232. Specific RAPs and livelihood plans will provide details of targets to be achieved, including budget requirements for implementation and monitoring and estimated dates for completion of targets.

11.2.5 Monitoring Reporting

233. 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
234. 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.

Table 11.1: Indicators of Resettlement and Compensation Effects

Impact	Mitigation Measures	Indicators	Monitoring Measures	Frequency	Responsibility
General Impacts	All mitigation measures	Total number of project affected people by type of impact (compared to number listed in RAP)	RAP Census and updates	Quarterly	RAP Unit
Loss of land – Agricultural	Loss compensation and livelihood restoration, including: <ul style="list-style-type: none"> Land for land (or land for less + agricultural improvement) Project employment Cash compensation 	<ul style="list-style-type: none"> Number of PAPs employed (who chose employment in compensation package) Number of PAPs receiving land for land Number of PAPs receiving monetary compensation for land improvements Compensation amount compared to actual cost, (all data compared to actual cost, (all data compared to total number of PAPs affect by loss of agricultural land). Timing of compensation against RAP commitments Use of monetary compensation Number of PAPs involved in agricultural improvement programs 	Quarterly survey of PAPs affected by land take	Quarterly	RAP Unit
Loss of land – Pastoral	<ul style="list-style-type: none"> Provision of temporary pasture land Animal husbandry improvement program Identification of long-term pasture land 	<ul style="list-style-type: none"> Number of pastoralists with temporary land Number of pastoralists with access to permanent land Size of pasture land compared to original land Productivity of cattle compared to baseline Adequacy of pasture land Number of PAPs (against total number of affected enrolled in agricultural improvement programs Number of herders providing meat to local markets Completion of pasture land replacement study 	<ul style="list-style-type: none"> Survey of sample of affected pastoralists Key stakeholder interview with pastoralists Review of Pasture land replacement study Survey of milk and meat produced by herders per cow 	Annually	RAP Unit
Loss of land – Urban	Compensation and land replacement	<ul style="list-style-type: none"> Size of replacement plots compared with original plot size Access to essential services / distance from essential services in comparison with previous plot. 	Annual survey of PAPs affected by land take	Annually	RAP Unit
Loss of annual crops	Compensation at market value	<ul style="list-style-type: none"> Number of PAPs receiving monetary compensation Adequacy of compensation against inflation Use of compensation money PAP satisfaction with compensation rate Timing of compensation process 	Annual survey of PAPs to include satisfaction survey, use of compensation money, survey of market value	Annually	RAP Unit

Impact	Mitigation Measures	Indicators	Monitoring Measures	Frequency	Responsibility
Loss of perennial crops	Monetary compensation at full replacement cost	<ul style="list-style-type: none"> Number of PAPs receiving monetary compensation Adequacy of compensation against inflation Use of compensation money PAP satisfaction with compensation rate 	Annual survey of PAPs to include satisfaction survey, use of compensation money, survey of market value	Annually	RAP Unit
Loss of community natural resources: palm plantation and wooded savannah, mangroves etc.	Replacement of palm plantations and replacement of communal land	<ul style="list-style-type: none"> Timing of replacement palm plantation (compensation before impact) Number of trees in new plantation Productivity of new plantations compared with old 	Annual survey of PAPs affected by land take	Annually	RAP Unit
All impacts with monetary compensation	Monetary compensation	<ul style="list-style-type: none"> Number of PAPs with bank accounts Number of PAPs receiving training re financial management Use of monetary compensation Timing of compensation - Number of PAPs consulted before project impacts, number of PAPs outstanding after impact Number of grievances 	Annual household survey	Annually unless specifically addressed in quarterly report	RAP Unit
Loss of primary residence and other infrastructure (wells, footpaths, kitchens, latrines etc).	Reconstruction of house and wells and compensation for other structures, or purchase of replacement house, or monetary compensation, help with moving etc.	<ul style="list-style-type: none"> Number of houses affected/finished Number of defects reported in houses (with description of defect) Quality of houses to predetermined standards Number of affected/monetarily compensated PAPs PAP satisfaction with housing Move and timing of reconstruction against RAP commitment 	<ul style="list-style-type: none"> Survey of constructed houses/structures Satisfaction survey of PAPs 	Quarterly	RAP Unit
Loss of residence - tenants	Compensation for moving costs, compensation towards cost of new rental including, compensation for loss of income to owner.	<ul style="list-style-type: none"> Number of tenants affected / assisted to find alternative housing PAP satisfaction with process and compensation Compensation rates compared with actual cost 	<ul style="list-style-type: none"> Survey of PAPs Satisfaction survey PAPs Rental market cost survey Survey of constructed buildings (for defects) 	Quarterly	RAP Unit

Impact	Mitigation Measures	Indicators	Monitoring Measures	Frequency	Responsibility
Loss of other structures	Compensation at full replacement cost	<ul style="list-style-type: none"> Number of PAPs affected/compensated PAP satisfaction rates 	<ul style="list-style-type: none"> Survey of PAPs including satisfaction survey 	Quarterly	RAP Unit
Relocation of schools and mosques	Reconstruction of schools and mosques	<ul style="list-style-type: none"> Number of schools and mosques affected/completed PAP satisfaction with completed structures Description of structure defects 	<ul style="list-style-type: none"> Survey of structures Satisfaction survey of PAPs Survey of constructed buildings (for defects) 	Quarterly	RAP Unit
Noise disturbance	Program to minimize noise, community compensation	<ul style="list-style-type: none"> Type of compensation PAP satisfaction with compensation Number of noise and blasting grievances – types and frequency 	<ul style="list-style-type: none"> Satisfaction survey of PAPs Review of grievances 	Quarterly	RAP Unit
Loss of access	Replacement of footpaths, improved roads/footpaths	<ul style="list-style-type: none"> Number and type of footpaths replaced PAP satisfaction with replacement plan and implantation 	<ul style="list-style-type: none"> Satisfaction survey Survey of traditional access routes and replacement routes 	Quarterly	RAP Unit
Interruption/loss of livelihoods because of land-take (herders, agriculturalists and food processors)	Land replacement, pastoral land replacement, employment with project, agricultural improvement, microfinance and development of micro-projects etc.	<ul style="list-style-type: none"> PAP income, agricultural productivity, cattle productivity, income produced by PAPs in livelihood restoration programs (economic development) Number of PAPs employed by project 	<ul style="list-style-type: none"> Household survey Survey of farmers Survey of herders Survey of micro-businesses 	Annually	RAP Unit
Interruption of livelihoods (businesses)	Re-build business structure (store etc.)	<ul style="list-style-type: none"> Amount and adequacy of monetary compensations Timing of compensation Time delay in restoring business livelihood Income generated by business (pre/post impact) 	<ul style="list-style-type: none"> Survey of businesses Survey of income generated by business 	Quarterly	RAP Unit
Disruption of social networks (resettled, host and not-resettled communities)	Resettlement of communities as communities on dedicated resettlement sites	<ul style="list-style-type: none"> PAPs satisfaction Host community satisfaction 	<ul style="list-style-type: none"> Survey of vulnerable people Consultation with host communities Review of grievances Integrity of households 	Annually	RAP Unit

Impact	Mitigation Measures	Indicators	Monitoring Measures	Frequency	Responsibility
Vulnerable people	Targeted support to vulnerable people.	<ul style="list-style-type: none"> • Number of vulnerable people (by category) • Percentage change since last quarterly report • Number of vulnerable people being assisted • Number of vulnerable people no longer vulnerable • Number of vulnerable people receiving assistance during compensation process, during move and during livelihood restoration 	<ul style="list-style-type: none"> • Survey of vulnerable people • Project documentation 	Quarterly	RAP Unit

Table 11.2: Indicators of Socio-Economic Changes

Topic	Indicators	Monitoring Measures	Frequency	Responsibility
Education	<ul style="list-style-type: none"> Number of children enrolled in education (disaggregated by gender) Number of children enrolled in primary, secondary education and above (disaggregated by gender) Relevant indicators related to vocational training 	Household survey of 20% of affected households	Annual	Community RAP Unit Department
Health	<ul style="list-style-type: none"> Infant mortality for under 5 Maternal mortality rates Cases of Malaria reported to health posts/centers Incidence of disease among PAPs 	Household survey of 20% of affected households	Annual	Community RAP Unit Department
Income	<ul style="list-style-type: none"> Household income disaggregated by gender Number in household employed Number employed by project (type of employment) New sources of income Amount of food stored 	Household survey of 20% of affected households	Annual	Community RAP Unit Department
Equipment and Possessions	<ul style="list-style-type: none"> Number of households with radios, bicycles, motorbikes, cars 	Household survey of 20% of affected households	Annual	Community RAP Unit Department
Utilities and water	<ul style="list-style-type: none"> Number of households with access to reliable source of potable water Number of households with access to electricity 	Household survey of 20% of affected households	Annual	Community RAP Unit Department
Social ills	<ul style="list-style-type: none"> Number of cases of petty crime reported Number of cases of domestic violence 	Household survey of 20% of affected households	Annual	Community RAP Unit Department
Local economy	<ul style="list-style-type: none"> Cost of basic food basket in local markets Cost to rent 1 ha of land Rental cost of 1 bedroom in Tinguilinta, Sangarédi, Boke, Kamsar Average daily unskilled labor rate (not project salary) Average daily agricultural labor rates Number of immigrants to local towns 	Household survey of 20% of affected households Economic Survey Interviews with local chiefs and government officials (re in migration)	Annual	Community RAP Unit Department
Employment	<ul style="list-style-type: none"> % of unskilled project labor that are PAPs (disaggregated by gender) % of semi and skilled project labor that are PAPs (disaggregated by gender) Number of jobs created by project, by category 	Review of employment logs	Annual	Community RAP Unit Department
Stakeholder Engagement	<ul style="list-style-type: none"> Number of times PAPs consulted and type of meeting PAP attitude towards Project PAPs informed of entitlements Participation in consultation process from gender/vulnerable groups' perspective. 	Household survey of 20% of affected households	Annual	Community RAP Unit Department

Topic	Indicators	Monitoring Measures	Frequency	Responsibility
RAP Grievances	<ul style="list-style-type: none"> • Number of grievances filled by category • Number of grievances outstanding • Average time for closure of grievance • % of grievances resolved by mutual agreement • Analysis of categories of grievance to develop understanding of potential recurrent problems 	Review of grievance logs	Quarterly	Community Department RAP Unit

11.3 EXTERNAL COMPLIANCE MONITORING

11.3.1 Monitoring by the Government of Guinea

235. 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.

11.3.2 External Monitoring

236. 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 AfDB Operational Safeguards 1 and 2 particularly with regards to:
 - i. Timely delivery of compensation entitlements (including cash compensations, resettlement packages, etc.)
 - ii. Timely delivery of livelihood restoration measures
 - iii. Grievance management
 - c. Progress on recommendations made by the external Consultant in previous missions
 - d. Review of implementation issues and of the efficacy of implementation organisations, both external (including mediation and resettlement committees) and internal to GAC.
237. Methods to be used by the external consultant will include:
- a. Review of internal monitoring procedures and reporting to ascertain whether these are being undertaken in conformance with this Resettlement Framework and relevant RAP document;
 - b. Review internal quarterly monitoring records as a basis for identifying any areas of non-compliance, and recurrent problems, or potentially disadvantaged groups or households,
 - c. Review PAP specific grievance records for evidence of significant non-compliance or recurrent poor performance in resettlement implementation (and summarising any "more substantial" disputes which have arisen during RAP Implementation, and whether these appear to have been resolved in a fair and reasonable manner).
 - d. Interview a representative cross-section of affected households (including vulnerable people) and enterprises to gauge the extent to which affected people's standards of living and livelihoods have been restored or enhanced as a result of the project.
 - e. Interview a cross section of affected community and key informants.
 - f. Interview Resettlement Committee members as well as Mediation Committee members.
238. External compliance monitoring will require the presence of the External consultant for about a period of 12 days in Guinea every year.

11.4 COMPLETION AUDIT

11.4.1 Objectives and Scope

239. 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.
240. 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).
241. A successful Completion Audit signals that the Project is in compliance with the RAP and other regulatory laws and guidelines.

11.4.2 Completion Audit Indicators

242. In addition to the indicators in the Outcome Evaluation, the Completion Audit includes an assessment of the following inputs and outputs:
- a. Incomplete mitigation measures,
 - b. Unresolved grievances,
 - c. Compliance with commitments, Performance Standards and Guinean law,
 - d. Number of people compensated,
 - e. Number of houses constructed and people moved,
 - f. Number of livelihoods restored (the RAPs define quantitative restoration objectives).

11.4.3 Completion Audit Reporting

243. 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.

Appendix 1. **LIST OF CIVIL SOCIETY ORGANISATIONS AND NGOS**

The list below is maintained by the GAC Communications Department. A detailed list including contact details is available from the GAC Communications Department.

Name of Organisation	Area of Activity
Women's Groups Sangarédi	
BENDA	Trade, market gardening
CIADIB (coordination des initiatives et action pour le développement de Bowé)	Assist elected officials and public power in the search for solutions, promote mutual support among stakeholders, facilitating framework between the parties
CITE NORD	Vegetable gardening, dyeing, saponification
CONAG	Guinean national coalition for women's rights and citizenship
FENTENYI	Sanitation, trade
GROMUSEL (Groupements multi sectoriel de lavage)	Saponification, small livestock
GROUPEMENT SAMAYABHÉ	Agriculture
HALDI FOOTI	Dyeing, peanuts
LA PAIX	Saponification, vegetable farming, small trade
LANDJI	Dyeing, literacy, saponification, culture
MOUNAFANDJI	Selling fish
SABOU FANDJI (CAF)	Embroidery, hairdressing
SOTESA (Société des teinturières de Sangarédi)	Dyeing, saponification
TYAPI KOURE	Vegetable gardening, agriculture
UNION	Saponification, dyeing
UNION DES FEMMES COUTURIERES DE LIMANIYA	Sewing, embroidery, literacy
WASSÉSSO	Saponification, dyeing
YETE MALI	Dyeing, literacy
Health Sangarédi	
FENTEDJI	Public sanitation
INAASPO	<ul style="list-style-type: none"> Vulnerable people Health
National NGOs	
A.CO.SO.F (Aide aux Couches Sociales Fragiles)	<ul style="list-style-type: none"> psychosocial assistance to target groups advocacy of target groups, with policy makers (government institutions) building shelters, awareness about methods of struggle against HIV and other diseases
ADECOMA (Assistance aux développements communautaires)	Health, integrated development, micro project support to communities, environment, farming
ADIC (Association d'appui au développement des initiatives communautaires)	Health, education, environment, economic activities

Name of Organisation	Area of Activity
AGBF (Association guinéenne pour le bien-être familial)	Guinea Association of Family Welfare
AGPS Association guinéenne des professionnels de la santé	Guinean Association of Health Professionals
AGUIFEDI (Association Guinéenne des femmes pour le développement)	Health education, economic activities
AGUIEB Association guinéenne des techniciens biologistes	Health, Guinean Association of Biologists Technicians
AIME (Action d'intégration mère et enfant)	Counselling and support for the vulnerable layer (AIDS orphans and women living with HIV)
APPEF (Association pour la protection et la promotion des Enfants et des Femmes)	Association the protection and promotion Children and Women
CERREGUI (Cellule de la recherche en santé de la reproduction en Guinée)	Research, reproductive health training
CGAC (Corps guinéen d'aide en cas de catastrophe)	Training of health workers and environmental agents
CGPD (Corps Guinéens pour la Paix et le Développement)	<ul style="list-style-type: none"> • Health: HIV / AIDS, Malaria; • Environment; • Rural entrepreneurship; • Education; • Promoting a Culture of Peace; • Nutrition and child; and • Fight against public health issues.
FMG (Fraternité Médicale Guinée)	Support for the development of health with the intervention of doctors and social workers
FOGUIRED (Fond Guinéo – Italien de la reconversion de la dette)	<ul style="list-style-type: none"> • Health and education for needy; • Agriculture (promotion of processing, preservation and marketing); and • Creation and promotion of small/medium enterprises and cooperatives.
PIME (Protection Intégration Mère et Enfant)	<ul style="list-style-type: none"> • awareness of adolescents and youth about unwanted pregnancies • correct use of modern contraceptive methods
Environmental	
ADAM (Association pour le développement agricole de la mangrove)	Contribution to the sustainable management of mangrove ecosystems, nurseries for mangrove rehabilitation.
AFES (Association Femmes Eau Assainissement)	Treatment of drinking water (potabilisation) in Faranah Latrine project in Kindia(300 Sanplat type of latrines)

Name of Organisation	Area of Activity
AGIREA (Association guinéenne pour la gestion intégrée des ressources en eau et assainissement)	<ul style="list-style-type: none"> • construction of impluviums • construction latrines and improvement of amenities for household cleaning • protection and reforestation of areas of boreholes
Agrettage (membre du Réseau Africain pour la Conservation de la Mangrove "RAM")	Rehabilitation of mangroves
AGUIDEPE/ ALKADIAF (Association guinéenne pour la défense et la protection de l'environnement)	<ul style="list-style-type: none"> • organization of competitions with secondary schools for nature conservation topics • support advice to Kankan mango growers in order to meet the expectations of international markets • organization and support of small groups and fruit production cooperatives of low and high Guinea • publishing a monthly newspaper on the environment (Environmental Information)
APEK –agriculture (Association pour la promotion économique de Kindia)	<ul style="list-style-type: none"> • Quarry restoration • Reforestation • Developing surrounding lowlands of mining sites
ARGEDE (Association pour la restauration et la gestion durable de l'environnement)	Association for a restoration and sustainable management of the environment
ASSAINISSEMENT GUINEE	<ul style="list-style-type: none"> • deferred grazing sites for reforestation • reforestation of 120 hectares • awareness
Enviro-Africa	Environmental Protection, climate change
Guinée Ecologie	<ul style="list-style-type: none"> • environment (awareness and studies) • support artisanal fisher group in order to train them for a transfer of jurisdiction to their colleague for the protection of sea turtles species protected by CITES (Convention on International Trade in Endangered Species of Wild fauna and Flora) • classification of islands as protected areas as a refuge to certain species of fauna • protection of chimpanzees • full implementation or part of the environmental impact assessment of various mining projects
ODIC –GUINEE (organisation pour le développement intégré communautaire)	<ul style="list-style-type: none"> • Sanitation • Environment • Health Education • Emergency operation in case of social conflicts and / or natural disasters <ul style="list-style-type: none"> • animation / participatory awareness • rural masons training on making latrine slabs • latrine construction, improved wells and boreholes • reforestation project of 118 ha Forécariah • building resettlement camp for refugees of Dabola
OGES (Organisation guinéenne pour l'environnement et la santé)	Environmental

Name of Organisation	Area of Activity
<p>PLASSED (Planète sans sécheresse environnement et développement)</p>	<ul style="list-style-type: none"> • Reforestation • Recycling of sawdust residue • In collaboration with the Guinean Company of Works: <ul style="list-style-type: none"> ○ preparation of site plans for water and electrification of the Lambayi area Soloprime ○ installation of public lighting poles in the city of Conakry for Sogel
<p>PREM (Partenariat Recherche Environnement & Media)</p>	<ul style="list-style-type: none"> • Elaboration and implementation of biodiversity conservation projects. • Valuation of non-destructive local knowledge of the environment. • Coastal Zone and Marine Conservation Program • Creation of 2 marine protected areas on islands of Tristao Alcatraz • Promotion of salt production and reforestation of mangrove areas of Sumbouya and Mélaacoré • implementation of the project '<i>Development of solar salt extraction methods</i>' in collaboration with ADAM
<p>R.G.E (Réseau Guinéen pour l'Environnement)</p>	<p>Environment (research and development of medicinal plants, reforestation)</p> <ul style="list-style-type: none"> • identification and implementation of a conservatory garden of medicinal plants in Kindia • nursery for reforestation of areas of public interest
<p>Univers Sel,</p>	<ul style="list-style-type: none"> • Capacity building in driving techniques, nurseries and reforestation with a view to disseminating good practices among rural communities operating in the mangrove. • Assess mangrove reforestation impacts • Identify techniques and approaches used in the regeneration of mangroves • Development of action plan for the conservation and sustainable management of ecosystems
Education	
<p>ABDC Centre ABDC Nord ABDC Sud (Association for the development of de Bowé centre)</p>	<ul style="list-style-type: none"> • Construction of health centres, schools, community development in collaboration with GAC • Mainly in Mobhi village
<p>AME (Association Mère Enfant)</p>	<ul style="list-style-type: none"> • Education • Health • Nutrition • Humanitarian assistance • Literacy
<p>Guinée Challenge</p>	<ul style="list-style-type: none"> • Support to vulnerable groups • Installation of school libraries

Name of Organisation	Area of Activity
Socio-economic Development	
<u>ADDA</u> (Aide aux développements communautaires)	Economic development
<u>ADIS</u> (Association for the integrated development of Sangarédi)	<ul style="list-style-type: none"> • Creation of small and medium enterprises • Environment • Agriculture • Training groups for market gardening • Saponification Group in Conakry
<u>AGACFEM</u> (Association Guinéenne pour l'allègement des charges féminines)	<ul style="list-style-type: none"> • Creation of small and medium enterprises • Environment • Agriculture • Training groups for market gardening • Saponification Group in Conakry
<u>AGFC</u> (Association guinéenne des femmes chercheuses)	Economic development
<u>AGROSUD</u>	Economic development
<u>AFEG</u> (Association des femmes entrepreneurs de Guinée)	<ul style="list-style-type: none"> • Creation of cooperatives • Capacity building • Sustainable community development • Union • Creation of 35 individual SMEs • Implementation of 22 production cooperatives • Conservation agricultural products • Creation of 10 fruit drying units and vegetable
<u>AFSI</u> (Appui aux Femmes de Secteur informel)	<ul style="list-style-type: none"> • Creating SMEs • Microfinance • Health • Training 30 women in association management • Establishment of a revolving credit system for sellers of used clothing
<u>Autogestion Paysanne</u>	<ul style="list-style-type: none"> • Recovery and conservation of local fruits • Fruit preservation by drying, • Application of post-harvest technology, • Social communication on HIV / AIDS • Training in the development and child psychology
<u>CAD</u>	<ul style="list-style-type: none"> • Support centre for development
<u>CECIDE</u>	Human rights (CBG Collaboration)
<u>CENAFOD</u> (Centre africain de formation pour le développement)	<ul style="list-style-type: none"> • Local development • Professionalization of rural-based self-promotion • Strengthening capacities of socio-economic groups • Process of social change catalysed, created, designed and evaluated by the population itself
<u>CIFAD</u> (Comité international des femmes africaines pour le développement)	Economic development

Name of Organisation	Area of Activity
<p>COFEG (Coordination des ONG féminines en Guinée)</p>	<ul style="list-style-type: none"> • Socio economic, political and cultural development • Effective mobilization of women's associations in the preparations for conferences on population and development in Cairo in 1994 and Beijing on Women in 1995, the 1996 Rome Food • Training of women's NGOs • Awareness campaigns against FGM • Wide extension of some national and international legal texts
<p>CNTG (Confédération nationale des travailleuses de Guinée)</p>	<ul style="list-style-type: none"> • Adult education • Voter education • Capacity building • Establishment of a cooperative planning • Creation of a mutual health
<p>CONAG – DCF (Coalition Nationale de Guinée pour les droits et la citoyenneté des femmes)</p>	<ul style="list-style-type: none"> • Promote the realization of women's citizenship, participation in public management and decision-making bodies and strengthening the economic power of organized groups • Strengthen institutional capacity, response and leadership • Advocacy and lobbying policy makers and partners for the inclusion of women's rights • Adult Literacy, • Awareness of FGM (Female Genital Mutilation) practitioners and opinion leaders against FGM • Campaign "civil status documents and national identity card " • Awareness about stereotypes and negative discriminatory sociocultural prejudices against girls and women • Awareness about violence against girls • Training and deployment of 400 paralegals who have raised awareness amongst 99,443 people including 79,443 rural women.
<p>DIS (Développement intégré de Sangarédi)</p>	<p>Promotion of private initiatives for decentralized communities following: Touldé, Petel Djiga, Thiankou thioli, Mobhi, Botoré, Parawi, Sinthiourou Toul.</p>
<p>TPA (Technologie et partenariat agro-alimentaire)</p>	<ul style="list-style-type: none"> • Agro food sector • Fishing • Livestock • Awareness on environmental protection • Identification source Tinguilinta heads and Cogon for reforestation
<p>UDESE (Union pour le développement économique de Songoyah et l'aide à l'enfance)</p>	<ul style="list-style-type: none"> • Socio-economic development • Construction of 30 primary schools in the Boké region.

Name of Organisation	Area of Activity
INTERNATIONAL NGOS	
Health	
<u>AFRICARE</u>	Supporting local development : <ul style="list-style-type: none"> • support to health and nutrition, • support to health services • support for agriculture • support of Fishworkers Environmental Management Sanitation/Health/Nutrition <ul style="list-style-type: none"> • strengthening nutrition capacity at the base (production and food security) • sanitation and garbage collection in the city of Conakry • strengthening capacities of municipalities and SMEs in waste collection and disposal Functional Literacy
<u>ARC</u> (American Refugee Committee)	<ul style="list-style-type: none"> • Humanitarian • Support to health structures, • Awareness on HIV / AIDS
<u>Croix Rouge</u> (Red Cross)	<ul style="list-style-type: none"> • Health care • Disaster relief / emergency health care
<u>CRS</u> (Catholic Relief Services)	<ul style="list-style-type: none"> • Aid to disaster victims • Assist the Poor, • Support self-help programs • Draft anti-retroviral treatment • Food assistance to people infected and affected by HIV / AIDS • Food distribution • Gouéckédou rehabilitation of villages, • Support to agriculture in Upper Guinea
<u>ENGENDER HEALTH</u>	<ul style="list-style-type: none"> • Improve access to care health • Prevent fistula • Training of health professionals • Training specialists for fistula, urologists and gynaecologists
<u>FNUAP</u> (Fond des Nation Unis pour la population)	<ul style="list-style-type: none"> • Promoting access to health care of reproduction (planning and sexual health) • Advocacy for resource mobilization and political commitment • Improving living conditions of the population through actions to fight against poverty • Contribute to the implementation of the national health program reproductive NRHP
<u>MSF</u> (Médecin Sans Frontiers / Doctors Without Borders)	<ul style="list-style-type: none"> • Health care • Disaster relief / emergency health care

Name of Organisation	Area of Activity
PSI (Population Service Internationale)	<ul style="list-style-type: none"> • Primary health • Social marketing of basic health products • Communication for behavior change • Identification of target groups exposed to STIs / HIV / AIDS
Environment	
WCF (Wild Chimpanzee Foundation)	<ul style="list-style-type: none"> • Wildlife conservation, focused on primates and chimpanzees
Education	
AIDE ET ACTION:	<ul style="list-style-type: none"> • Support for the administration of education (mobilization of funds for education) • Support the steering structures (influencing state policies and technical and financial partners to make education the centre of development issues) • Support to communities (contribution to support the communities in their own development through education)
CCF (International Christian Children's Fund)	<ul style="list-style-type: none"> • Protection • Building school • Child guidance centre • Trail development (allowing access to schools built)
CECI (Centre canadien d'étude et de coopération internationale)	<ul style="list-style-type: none"> • Education • Programs to support village communities • Humanitarian aid
PQG (Partage Québec – Guinée)	<ul style="list-style-type: none"> • Education
SAVE THE CHILDREN	<ul style="list-style-type: none"> • Education, thematic diagnosis • Child Protection
UNICEF (United Nations Children's Emergency Fund)	<ul style="list-style-type: none"> • Education (a special feature on education of the girl) • Teacher training and school construction • Vaccination campaign • Support to the Ministry of Public Health ; • Support to the Ministry of Social Affairs
Socio-economic Development	
IFAD (International Fund for Agricultural Development)	Rural development (rural water supply, agriculture, lowland development, micro finance)
PRIDE FINANCE (Integrated program for enterprise development)	<ul style="list-style-type: none"> • Micro-finance
UNITERRA (Canadian program for international volunteers (association between CECI and WUSC))	<ul style="list-style-type: none"> • Agriculture • Help partners in capacity building