

Guinea: Simandou III
Early Works Environmental and Social Action Plan (ESAP)¹
July 2013

#	Action	Overarching Action or Relevant to a specific SEIA (Roads, Quarry, Camps or MOF)	Completion Indicators	Timeframe
1	Develop a Project Wide In-migration Plan that incorporates: (i) understanding the dynamics of in-migration; (ii) positive and negative impacts; (iii) assessment of the probability and risk of migration induced changes; (iv) alignment with Government strategies/policies on regional & urban planning and community development (e.g. ECOWAS); (v) adaptive management strategies aimed at mitigating negative impacts and enhancing the benefits; (vi) sustainable natural resource management; (vii) stakeholder engagement and monitoring; and (viii) 'boom' effects associated with growth in the local economy.	Overarching	Documented Plan.	30/09/2013
2	Document the project strategy for camp and road locations, that outlines: (i) Justification/explanation of proposed camp and road siting, size, expected duration; (ii) application of avoidance criteria, utilisation of existing roads and disturbed areas aimed at minimising footprint; (iii) decommissioning plans for individual sites, including 'bust' effects from sudden local economic downturns; (iv) a monitoring program to assess the effectiveness of rehabilitation. Sites located in focal habitats will be restored to previous conditions. This will be communicated to local authorities and communities prior to, and throughout, the use of the camp / road.	Camps and Roads	Documented Strategy	Prior to construction commencing on new camps and roads

¹ The following does not alter the conditions of the Governance Arrangements Agreement between Simfer Jersey Limited and the International Finance Corporation (IFC) dated 28 June 2012 with particular reference to clause 3.5.

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3	Develop a Dredging and Spoil Disposal Management Plan that includes: (i) the results from the dredge plume modelling; (ii) summarised information arising from baseline studies and assessment of impacts; (iii) location and rationale for disposal site(s); (iv) a detailed monitoring and reporting program; (v) non-conformance and emergency response procedures.	MOF	Documented Plan.	Prior to dredging commencing
4	Develop a stakeholder engagement and communications strategy that: (i) identifies the Project Affected Communities; (ii) outlines the plan for ongoing consultation prior to, during and post construction activities (iii) encompasses - predicted and actual impacts, (iv) implementation and effectiveness of mitigation measures, (v) relevant Project updates, and; (vi) ensures the Grievance Mechanism is understood and available. The Project will allocate the appropriate number of community liaison officers to adequately execute the engagement strategy.	Overarching	Updated Strategy	30/09/2013
5	The Project will (i) complete a 'mini' inselberg-specific critical habitat evaluation and Net Positive Impact (NPI) assessment on the quarrying of the eastern side of the MOF Inselberg and (ii) hold discussions between site management and the quarry contractor to a) define and agree on the quarrying method and b) ensure that the risks associated with quarrying in proximity to conservation priority species are understood and the mitigation commitments are appropriate.	MOF	Critical habitat evaluation and NPI assessment	Before construction commences on the eastern side of the MOF Inselberg
6	The Project will undertake the following actions moving forward with respect to MOF Inselberg habitat: (i) Potential impacts on the inselberg habitats will be monitored during quarrying by the Project environment team and appropriately trained botanical specialists; (ii) Apply adequate resources to the translocation of conservation priority species such that the program is a success.	MOF	Monitoring reports	During quarrying activities

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7	The Project agrees that they will not quarry the western side of the MOF Inselberg unless NPI can be demonstrated for MOF conservation priority species. To that end the Project will: (i) undertake discussions with government on developing biodiversity offsets for inselbergs. (ii) review the design of the stockyard with the objective of avoiding impacts on the inselberg forest and the small inselberg for the long-term (set-asides); (iii) continue to be in communication with IFC and other parties with respect to decision-making on this topic.	MOF	Project NPI assessment Meeting minutes Monthly conference call	Three months prior to construction commences on the western side of the MOF Inselberg