

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

#	Action	Overarching Action or Relevant to a specific SEIA (Roads, Quarry, Camps or MOF)	Project Component (Mine, Rail, Port, Infrastructure)	Completion Indicators	Timeframe
1	Volume V – SEMP Registry & Tracker	The Project will develop a register to track status of each of the commitments made in Volume V - SEMP. It will outline how the Project intends to meet the commitment including relevant information such as: a) respective management plan, procedure, action plan and/or strategy, b) additional studies to be conducted in the context of the PARC program that will provide contributing socio-economic/land use data.	All	Documented registry and tracker	31-Dec-13
2	Construction Phase Environmental and Social Management Plans	The Project will prepare a schedule for the development of Management Plans ² required for the construction phase for all Project components. The schedule will outline the delivery timeframe, scope and resources required to produce each of the Management Plans. The content of the Management Plans will be agreed with the IFC prior to construction commencing ³ on the relevant Project component.	All	Documented schedule	31-Dec-13
3	Operations Phase Environmental and Social Management Plans	The Project will prepare a schedule for the development of Management Plans required for the operations phase for all Project components. The schedule will outline the delivery timeframe, scope and resources required to produce each of the Management Plans. The content of the Management Plans will be agreed with the IFC prior to the operations phase commencing ⁴ on the relevant Project component.	All	Documented schedule	12 months prior to the operational phase commencing

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.

² Management Plans are those outlined in Volume V of the Simandou SEIA and also include Actions Plans, Strategies and Management Systems.

³ Commencement of construction is defined as ground-breaking works associated with the relevant component of the Project as defined in the Simandou SEIA.

⁴ Commencement of operations phase is defined as first commercial ore on ship associated with the scope of the Project as defined in the Simandou SEIA.

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4	Provision of adequate resources	The Project will ensure that over the long-term its environmental and social management program is resourced and financed to meet its project environmental and social commitments and IFC's Performance Standards.	All	Results of Independent Monitoring Group review	Assessed annually
5	Resettlement (PARC) Framework Disclosure and Consultation	The Project will: a) disclose and explain the GoG-approved PARC ⁵ Framework to project-affected persons including host communities as part of the initial stakeholder engagement and/or during the survey process; and b) engage project-affected persons including host communities in an iterative consultation process;	All	Records of disclosure Documented register of feedback Resettlement Action Plans	For the duration of the resettlement process
6	Resettlement Planning	The Project will agree with the Government on key activities (e.g., identification and allocation of replacement land) to be undertaken to facilitate the resettlement planning process and implementation of the RAPs .	All	Documented schedule	Six months prior to any displacement
7	Resettlement Action Plans	The Project will: a) develop the RAPs (including livelihood restoration) through a process of informed consultation and participation with the affected persons including host communities prior to any displacement taking place; and b) disclose the draft RAPs to the affected persons including host communities providing them sufficient time to consider their options and provide feedback to be incorporated into the RAPs.	All	Resettlement Action Plans Records of disclosure	a) 90 days prior to actual displacement taking place b) 60 days prior to actual displacement taking place
8	Transhumance	The Project will: a) conduct a desktop study to identify and map pastoralists activities and their herding territories along the railway corridor and related infrastructure, utilizing participatory approaches to inform the detailed design for the rail; b) as part of the PARC process, collect transhumance data (including access rights, transhumance, seasonality etc) along the railway corridor and ensure that appropriate mitigation measures are incorporated into the design prior to construction commencing.	Rail, Infrastructure	Documented study report including maps Documented list of mitigation measures	Prior to completion of the detailed design of the rail crossings

⁵ The term given to the resettlement process required for the Simandou Project is the Plan d'Action Reinstallation et Compensation (PARC).

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9	Project In-migration Strategy and Implementation Plan	The Project will: a) undertake a review of existing plans and programs where in-migration is considered including relevant aspects as completed for the Early Works Program (e.g. recruitment program, engagement activities etc.); and b) develop a project-wide In-migration Strategy c) develop Action Plans for each project component (Mine, Port, Rail) to address key aspects of the in-migration and its impacts.	All	Documented review Documented strategy Action plans	a) Six months prior to the construction phase commencing b) and c) Three months prior to the construction phase commencing
10	Stakeholder Engagement and Disclosure Strategy	The Project will: a) update the existing Stakeholder Engagement Strategy to address project-wide consultation activities prior to and during constructions, operations and closure b) As part of the stakeholder engagement plans for each project component, develop a schedule for disclosure of information to project-affected persons including host communities as part of managing risks and impacts and seeking feedback c) Update the stakeholder engagement plans (for each project component) on an annual basis	All	Documented strategy Documented engagement plan(s)	Three months prior to construction phase commencing
11	Water Strategy	The Project will develop a project-wide Water Strategy for agreement with the IFC that outlines how the Project intends to effectively manage water related risks and opportunities. It will include: a) water objectives and management structure b) baseline information and regulatory setting c) standards and design criteria d) component specific risks, mitigation strategies and additional study/field work required e) estimated water requirements f) additional information on how and when water related commitments made in Volume V - SEMP will be implemented.	All	Documented strategy	Three months prior to construction phase commencing

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12	Biodiversity Action Plan	The Project will agree with IFC on the scope of the Biodiversity Action Plan (BAP), which will include biodiversity commitments made in Volume V – SEMP. The final version will also be agreed with the IFC on completion prior to construction commencing.	All	Agreed scope	30-Sep-13
13	Biodiversity Advisory Group	Further to the existing Simandou Biodiversity Partners Group and stated commitments in SEIA Volume V SEMP the Project will agree with IFC on the terms of reference and scope of work for the Biodiversity Advisory Group, including commencement date, specialists, work program and external review of existing data.	All	Documented terms of reference	31-Dec-13
14	Biodiversity Studies - Rail	The Project will agree with IFC on the scope of additional studies needed to understand the extent of connectivity impacts from the rail on wildlife to inform the detailed design of the rail.	Rail	Agreed scope	Prior to finalisation of the detailed design of the rail
15	Biodiversity Monitoring and Evaluation Program	Further to stated commitments in SEIA Volume V SEMP the Project will develop and implement a terrestrial, freshwater and marine Biodiversity Monitoring and Evaluation Program with a statistically defensible design. The Program scope of work and implementing agency terms of reference will be agreed with the IFC.	All	Documented monitoring & evaluation program	Three months prior to construction phase commencing
16	Marine Community Safety Management Plan	The Project will develop a Marine Community Safety Management Plan, which includes, for example, maps of work zones with respect to construction schedule, operations exclusion zone, specifications for navigational buoys, engagement strategy to inform local fishermen, and enforcement protocols.	Port	Documented management plan	Prior to construction phase commencing

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17	Fisheries	The Project will: a) develop an adequate year-round characterization program of marine fisheries and their use by local communities. The scope of this program will be agreed with IFC with respect to the analysis of existing data and additional fisheries studies required (including fish spawning studies); b) develop, agree content with the IFC and implement a comprehensive fisheries management and monitoring plan for the life of the Project.	Port	Agreed scope Documented management and monitoring plan	a) Three months prior to construction commencing in the marine environment b) Prior to construction phase commencing in the marine environment
18	Underwater noise	The Project will revisit the underwater noise modelling and mitigation measures with respect to impacts on aquatic fauna, including marine mammals to inform final design of the port wharf structure, including pile design and construction.	Port	Documented report	Three months prior to final design of wharf and related infrastructure is completed