

Simfer S.A.

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## Simandou Project Stakeholder Engagement Plan September 2011



Product Group: Iron Ore

Business Unit: Simfer S.A.

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# 1 Introduction

## 1.1 Context of the Document

This document presents a first issue of the Stakeholder Engagement Plan (SEP) for the proposed Simandou Project, an iron ore mining development located in eastern Guinea, approximately 600 km from the Guinean coast and 400 km from the Liberian coast.

The Project comprises:

- a 95 million tonnes per annum capacity iron ore mine in the Simandou Range in south-eastern Guinea;
- a Trans-Guinean railway of approximately 640 km to transport the ore from the mining concession to the Guinean coast;
- a new deepwater port south of Conakry in the Forécariah Prefecture;
- a network of associated utilities and infrastructure developments to support construction and operation of the mine, railway and port, including a 20 km<sup>2</sup> dam and 40MW hydroelectric power plant at Lolema in Kérouané Prefecture.

The concession licence-holder and project company is Simfer S.A., which is currently owned 5% by International Finance Corporation (IFC) and 95% by the Rio Tinto Group. In April 2011, the Republic of Guinea and Simfer S.A. (Simfer) signed a Settlement Agreement, which confirms Simfer's title to a southern part of Simandou. The Settlement Agreement provides the Republic of Guinea with the right to progressively take a stake of up to 35% in Simfer (the Mine) and, a 51% stake in a separate company to be created (known as a special purpose vehicle the "SPVA") to build, own and operate the Project's (Rail & Port) Infrastructure. The Settlement Agreement also acknowledges the proposed participation by Aluminium Corporation of China Limited (Chinalco) through a Joint Venture with Rio Tinto.

The SEP is designed to ensure that the Project's plans for engagement with external stakeholders during all phases of development of the Project are communicated and understood by all those concerned.

Stakeholders are considered to include all external organisations and individuals who may be affected by the Project or who have an interest in the Project. These may include elected representatives, government authorities and other public bodies, affected people and their representatives, commercial and community enterprises, non-governmental organisations representing environmental, social, labour, commercial and other interests, academic and research organisations, international bodies, representatives of civil society and the general public. The SEP sets out the approach which the Project will follow to implement a robust engagement programme with all these different groups of stakeholders in accordance with Guinean legislation, IFC Performance Standards, other relevant international standards and Rio Tinto requirements (see Section 2). This SEP builds on and is aligned with the existing public consultation and disclosure practices and systems which have been followed to date during planning for the Simandou project<sup>1</sup>.

The SEP is a live document and will be developed progressively, and updates issued, as the Project moves through the various phases of planning and implementation. This first issue is focussed on engagement during the phase of Social and Environmental Impact Assessment (SEIA) which is currently underway. An update will be issued shortly which will include detailed plans for engagement during the process of Land Acquisition, Compensation and Resettlement Planning (*Plan d'Action de Réinstallation et de Compensation - PARC*) which is about to commence, and further updates will address later stages of pre-construction, construction, operation and eventual closure of the Project.

## 1.2 Project Stakeholder Engagement Principles

Rio Tinto's Communities Standard defines the company's policy with regard to engagement. It requires that mutually acceptable consultation and engagement procedures are carried out, in good faith with mutual obligation. Procedures will be transparent, inclusive, culturally appropriate and publicly defensible, ensuring that:

- people and organisations who may be affected by or interested in the Project are as fully informed as practically possible, about the Project and its possible effects before they occur and have access to reliable independent advice;

<sup>1</sup> The Simandou Public Consultation and Disclosure Strategy (PCDS), published in October 2010.

- two-way discussions cover stakeholder issues and priorities as well as the concerns and needs of the company;
- discussions occur in a language and format that is understandable to local stakeholders;
- stakeholders participate to the greatest extent possible in social and environmental impact assessments;
- a record is kept of all formal meetings and informal meetings that involve commitments, including, how views of both the company and stakeholders may have changed, agreements reached and action items with dates for completion; and
- discussion and community decision-making reflects established local conventions and protocols, including gender considerations, supplemented if necessary by additional processes for inadequately represented and marginalised groups.

In accordance with this policy the Simandou project is committed to undertaking a process of stakeholder engagement which delivers an inclusive and continuous dialogue between the company and those potentially affected by and interested in the Project, using a wide diversity of activities and approaches to achieve effective engagement and spanning the entire lifecycle of the Project.

In line with current international good practice (see Section 2), the SEP has also been designed to ensure that engagement:

- is free of manipulation, interference, coercion and intimidation and free of charges for participation;
- takes place prior to decisions being made so that views expressed can be taken into account;
- is conducted on the basis of timely, relevant, understandable and accessible information;
- is undertaken in a culturally appropriate manner;
- includes all those interested in or affected by the Project;
- achieves a two-way dialogue; and
- is responsive, and includes explicit mechanisms for receiving, documenting and addressing comments received.

### **1.3 Structure of this Plan**

This SEP is organised as follows:

- Section 2: National Requirements and International Standards for Stakeholder Engagement;
- Section 3: Project Stakeholders;
- Section 4: Planned Stakeholder Engagement Activities;
- Section 5: Grievance Mechanism; and
- Section 6: Monitoring and Reporting Stakeholder Engagement.

As noted above this first issue of the SEP is focussed on stakeholder engagement during the Project SEIA. Section 4 therefore focuses on activities during this phase of development. Plans for stakeholder engagement during the Land Acquisition, Compensation and Resettlement Planning process which is just starting will be issued shortly.

## **2 National and International Standards for Stakeholder Engagement**

### **2.1 Introduction**

The purpose of this section is to set out the requirements that apply to stakeholder engagement for the Simandou Project. These drive from:

- the legal framework for SEIA and PARC in Guinea (Section 2.2);
- principles and procedures specified by IFC in their Social and Environmental Policy and Performance Standards (Section 2.3); and
- standards and policies adopted by Rio Tinto (Section 2.4).

## 2.2 National Requirements for Stakeholder Engagement

Guinean law sets out regulatory requirements for consultation and disclosure during both SEIA and PARC for projects including those in the mining sector. These are summarised in Sections 2.2.1 and 2.2.2.

### 2.2.1 Guinean Requirements for Stakeholder Engagement during the SEIA Process

Engagement requirements during SEIA derive from the Environment Code and are set out in “*Décret no. 199/PRG/SGG/89 codifiant les études d’impact sur l’environnement*” and in “*Arrêté ministériel no. 990/MNRE/SGG/90 concernant le contenu, la méthodologie et la procédure de l’étude d’impact sur l’environnement*”. Further guidance is provided in “*Les études d’impact sur l’environnement: termes de référence pour les études d’impact environnemental et social et guide d’évaluation*” published by the Ministry of the Environment in 2007.

According to these requirements, public consultation and stakeholder engagement are intrinsic and continuous elements of the SEIA process and a prerequisite to SEIA approval. The responsibility for stakeholder engagement rests with the Project Proponent, however, the Guidelines state that stakeholder engagement processes must align with:

- the procedures and operational policies of development banks such as the International Finance Corporation (IFC);
- the policies and procedures of relevant international agencies such as USAID, AFD, GTZ etc ; and
- any requirements specified by the Guinean Government.

The Guidelines provide recommendations on the consultation process and these are summarised in Table 2.1.

**Table 2.1: Summary of Guinean Guidelines Regarding Consultation Activities**

First Step of the Consultation Process
Preparation of draft SEIA terms of reference (ToR)
Consultation with the Ministry of Environment on the ToR
Detailed survey (villages and urban quarters)
Public consultation meeting in the affected communities
Project SEIA stakeholder mapping
Distribution of leaflets
Consultation meetings in villages and urban quarters
Public consultation meeting in Conakry
SEIA ToR Finalisation
Second Step of the Consultation Process
Preparation of SEIA report and action plans
Draft document sent to the Ministry of Environment
Establishment of a Public Information Office
Start of Public Inquiry
Non technical summary disclosure by the Project proponent
Consultation meetings (“réunions”) in villages and urban centres
Workshop with National Government officials in Conakry
Workshop with NGOs and businesses in Conakry
Public consultation meetings (“audiences”)

First Step of the Consultation Process
Preparation of a report by the investigating commissioner ( <i>"commissaire enquêteur"</i> )
SEIA revision according to report of <i>commissaire enquêteur</i>
Final report transmission to the Ministry of the Environment
SEIA Large Scale Public Disclosure
Disseminating SEIA Report at local information offices
Disseminating SEIA Report at an information office in Conakry
SEIA Report posted at the World Bank Infoshop
Disseminating SEIA Report on the IFC website
Disseminating SEIA Report on other websites as appropriate

The Guinean Guidelines also provide guidance regarding the stakeholder identification process. According to these guidelines, the process by which the stakeholders are identified should be transparent, defined and publicised. The following stakeholders should be considered:

- the State;
- sectoral institutions;
- local administrations;
- local inhabitants;
- influent persons (village leaders, etc);
- "*forces vives*" (NGOs, etc);
- local institutions (health, safety, education, etc.); and
- the general public.

Throughout the stakeholder engagement process, the interests of all relevant stakeholders must be addressed. All concerns must be given due consideration and there must be a two-way dialogue, and an explanation of consultations have influenced decisions about the project must be included in the final SEIA report.

### 2.2.2 Guinean Requirements for Stakeholder Engagement in Cases of Land Acquisition by Expropriation

Specific stakeholder consultation is also required where land is acquired involuntarily by expropriation under a Declaration of Public Interest (*Décret d'utilité publique* or DUP) as per the Land Rights and Domanial Code<sup>1</sup>. Articles 54 to 83 contain detailed provisions related to expropriation in the public interest. The definition of a project as a Project of National Interest (*Projet d'Intérêt National*, PIN) is governed by the Urbanism Code<sup>2</sup>, Section III Art. L. 121.14. A PIN may only be declared by a national decision made by the Government or the National Assembly.

If a DUP is declared then a ministerial order (*arrêté ministériel*) will detail the procedure to be applied. The procedure is as follows.

- A Public Enquiry is established (usually for one month), the official person in charge (*commissaire enquêteur*) is appointed, and the places where meetings are to be held are defined.
- Consultation with the interested public takes place in prefectures, sub-prefectures and rural settlements if relevant. This consultation includes a project presentation along with potential impacts and rounds of questions and answers.

<sup>1</sup> Land and Domanial Code, Law L/99/013/AN.

<sup>2</sup> Urbanism Code, Law L/98/17.98 – Legislative Section.

- The *commissaire enquêteur* prepares a report for the Minister of Urbanism and Habitat taking into consideration observations made by the public.
- The Project Proponent is expected to participate in the organisation of the Public Enquiry and bear its cost.

Another important step in the expropriation process is the *enquête parcellaire*<sup>1</sup> 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*).

## 2.3 International Finance Corporation's (IFC) Performance Standards

### 2.3.1 Introduction

The International Finance Corporation (IFC) is a partner with Rio Tinto in the Simandou Project. As such, the Project is subject to IFC's Social and Environmental policy and standards as set out in the Policy on Social and Environmental Sustainability and Access to Information Policy. These are currently being updated and reference has been made to the latest drafts which are available on the IFC website<sup>2</sup>.

These are supported by the IFC's Performance Standards (PS). Expectations regarding stakeholder engagement during SEIA and PARC are included in *Performance Standard 1: Social and Environmental Assessment and Management System* (PS1), and *Performance Standard 5: Land Acquisition and Involuntary Resettlement* (PS5). IFC has also published guidance in *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets* published in 2007.

The Policy on Social and Environmental Sustainability set out IFC's commitment to community engagement that ensures the "free, prior, and informed consultation of affected communities, leading to broad community support for the project"<sup>3 4</sup>.

### 2.3.2 IFC Performance Standard 1: Social and Environmental Assessment and Management Systems (PS1)

IFC Policy requires project proponents to engage with affected communities through disclosure of information, consultation, and informed participation, in a manner commensurate with the risks to and impacts on the affected communities. PS 1 contains clear requirements for community engagement, disclosure of information and consultation. The key objectives of PS 1 are summarised in Table 2.2.

**Table 2.2 Objectives of IFC Performance Standard 1**

Objectives of IFC Performance Standard 1
<ul style="list-style-type: none"> <li>• To identify and assess social and environmental impacts, both adverse and beneficial, in the project area of influence;</li> <li>• To avoid, or where avoidance is not possible, minimise, mitigate, or compensate for adverse impacts on workers, affected communities, and the environment;</li> <li>• To ensure that affected communities are appropriately engaged on issues that could potentially affect them;</li> <li>• To promote improved social and environmental performance for companies through the effective use of</li> </ul>

1 Land and Domanial Code, Art. 58 and 59.

2 International Finance Corporation Policy on Social and Environmental Sustainability; Version 2, December 1 2010 and International Finance Corporation *Access to Information Policy*, Version 2, December 1 2010, see <http://www.ifc.org/ifcext/policyreview.nsf/Content/Resources#Phase3>.

3 Broad community support is a collection of expressions by the affected communities, through individuals or their recognised representatives in support of the Project. There may be broad support even if some individuals or groups object to the Project.

4 IFC Policy on Social and Environmental Sustainability (paragraph 20).



## Objectives of IFC Performance Standard 1

management systems.

Performance Standard 1 requires that particular attention be given to:

- **Vulnerability:** As part of SEIA, individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status must be identified. Where groups are identified as disadvantaged or vulnerable, the project must propose and implement differentiated measures if necessary so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities.
- **Community engagement:** Community engagement must be undertaken with affected communities on an ongoing basis and must include disclosure of information. Engagement must be free of external manipulation, interference, coercion or intimidation, and must be conducted on the basis of timely, relevant, understandable and accessible information.
- **Disclosure:** During the process of Social and Environmental Assessment, the Project must publicly disclose the SEIA document, including a Social and Environmental Management Plan (the document which describes the measures to be put in place to manage impacts). If communities may be affected by risks or adverse impacts from the Project, the Project must provide such communities with access to information on the purpose, nature and scale of the project, the duration of proposed project activities, and any risks to and potential impacts on such communities. This must be undertaken in a manner that allows sufficient time for the affected communities to consider the issues and provide feedback. For projects with adverse social or environmental impacts, disclosure must occur early in the SEIA process, in any event before the project construction commences, and on an ongoing basis.
  - **Community risk and impact:** If affected communities may be subject to risks or adverse impacts from a project, the proponent must undertake a process of consultation in a manner that provides the affected communities with opportunities to express their views on project risks, impacts, and mitigation measures, and allows proponents to consider and respond to any comments received. Consultation must be undertaken in a manner that is inclusive and culturally appropriate.
- **Informed participation:** For projects with significant adverse impacts on affected communities, the consultation process must ensure that free, prior and informed consultation with affected communities occurs and that processes exist to facilitate participation by those affected. Informed participation involves organized and iterative consultation, leading to the proponent incorporating into their decision-making process the views of the affected communities on matters that affect them directly, such as proposed mitigation measures, sharing of development benefits and opportunities, and implementation issues.
- **Grievance mechanism:** The proponent must establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances regarding the project's social and environmental performance. The grievance mechanism must be scaled to the risks and adverse impacts of the project. It must address concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, at no cost and without retribution.
- **Broader stakeholder engagement:** The proponent must identify and engage with stakeholders that are not directly affected by the Project but those that have established relationships with local communities and/or interest in the Project – local government, civil society organisations, etc. – and establish a dialogue.
- **External reporting:** The proponent must provide periodic reports that describe progress with implementation of the Social and Environmental Management Plan on issues that involve ongoing risk to or impacts on affected communities, and on issues that the consultation process or grievance mechanism has identified as of concern to those communities. These reports must be in a format accessible to the affected communities. The frequency of these reports must be proportionate to the concerns of affected communities but not less than annually. During the construction period of the Project, feedback must be provided to the affected communities on a monthly basis.

### 2.3.3 IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement (PS5)

The main objectives of Performance Standard 5 are to avoid where possible, and otherwise minimise, the need for involuntary resettlement and to mitigate the adverse social and economic impacts of land

acquisition or restrictions on affected persons' use of land. This should be done by: 1) providing compensation for loss of assets at replacement cost; and 2) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected. The overarching intent is to improve or at least restore the livelihoods and standards of living of displaced persons prior to their resettlement.

Key requirements for stakeholder engagement during PARC processes are as follows.

- *Consultation requirements:* Following disclosure of all relevant information, the proponent must consult with and facilitate the informed participation of affected persons and communities, including host communities, in decision-making processes related to resettlement. Consultation must continue during the implementation, monitoring, and evaluation of compensation payments and resettlement to achieve outcomes that are consistent with the objectives of this Performance Standard.
- *Entitlement options:* Options for resettlement assistance should be generated through consultation with the displaced persons and reflect their priorities and preferences. These provisions apply to persons who are occupying the project area prior to a clearly defined and publicised cut-off date for eligibility.
- *Grievance mechanism:* The proponent must establish a grievance mechanism consistent with the requirements of PS 1 to receive and address concerns specific to compensation and resettlement. The mechanism must take into consideration customary and traditional methods for dispute resolution and must not impede access to any judicial recourse available to the affected communities.

## 2.4 Rio Tinto Standards

Rio Tinto is a global company and all business units throughout the world operate to the same high standards in terms of business practice, health & safety, environmental & communities and quality of product. As Rio Tinto's Guinean legal entity, Simfer is required to comply with these standards.

*The Way We Work* defines Rio Tinto's code of business conduct in relation to all aspects of its working environment. This document is supported by policies and standards on business integrity, procurement, human rights, health, safety, environment, communities, and continuous disclosure, amongst others.

Rio Tinto's *Communities Standard*<sup>1</sup> defines requirements with which all global operations must comply covering:

- communities multiyear planning (MYP);
- knowledge base;
- social risk analysis (SRA);
- mutually acceptable consultation and engagement procedures;
- community contributions, activities and targets;
- cultural heritage;
- resettlement of communities;
- legally binding agreements with communities;
- complaints, disputes and grievance;
- compensation;
- trusts, funds and foundations;
- human rights; and
- indigenous peoples.

Audits to assess compliance with the Standard are undertaken by trained Rio Tinto staff from other operations. Action plans are then developed to address any non-conformances identified. Progress is then tracked monthly on site and biannually by the Rio Tinto head office.

This SEP has been developed in line with the *Communities Standard* and aims to contribute to fulfilling Rio Tinto's stated corporate commitment:

<sup>1</sup> Rio Tinto, *Communities Standard*, 2011.

*“...to build enduring relationships with our neighbours that demonstrate mutual respect, active partnership and long term commitment.”*

### **3 Project Stakeholders**

#### **3.1 Introduction**

For the purposes of this plan, a stakeholder is defined as:

*“a person who has an interest in a particular decision or activity, either as an individual or as a representative of a group. This includes people who influence a decision, or can influence it, as well as those affected by it”<sup>1</sup>.*

The objective of stakeholder identification is to establish which organizations and individuals may be directly or indirectly affected (positively and negatively), or have an interest in the Project. Stakeholder identification is an ongoing process, requiring regular review and updates.

#### **3.2 Approach to Stakeholder Identification**

In order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder. As part of this it is particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the Project because of their marginalised or vulnerable status. It is also important to understand how each stakeholder may be affected - or perceives they may be affected – so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

For the Simandou Project stakeholders have been and will continue to be identified on a continuing basis by:

- (1) identifying the different categories of parties who may be affected by or interested in the project; these groups are mapped in Figure 3.1; and
- (2) identifying specific individuals or organisations within each of these categories taking into account:
  - a. the expected area of influence of the Project, that is the geographical area over which it may cause impacts (both positive and negative) over its lifetime, and therefore the localities within which people and businesses could be affected;
  - b. the nature of the impacts that could arise and therefore the types of government bodies, non-governmental organisations, academic and research institutions and other bodies who may have an interest in these issues.

The process of identifying the individual and organisations within each group is a continuing one. To date a large number of potentially affected and interested parties have been identified from:

- contacts that the Project has already made with communities, government departments and other organisations as part of its public consultation, disclosure and government relations activities to date;
- consideration of the area of influence of the Project insofar as it has currently been defined during the initial stages of the SEIA; and
- contacts with the Project made by outside organisations expressing an interest in the Project.

#### **Figure 3.1 Stakeholder Groups**

<sup>1</sup> Rio Tinto, Communities Standard, 2011. This accords with the IFC's definition of stakeholders as locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses, but in the context of social and environmental engagement, it does not include suppliers, contractors, distributors, or customers, because interaction with these parties is considered to be a core business function for most companies (see IFC *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*, May 2007).

#### Government Authorities

- Government Ministers
- Regional Governors
- Prefects (*Préfets*) and prefectural administrations
- Sub-prefects (*Sous-préfets*) and sub-prefectural administrations
- *Mairies de communes urbaines*
- *Présidents de quartiers*
- *Communautés rurales de développement* (CRD)
- Districts

#### Advisory and Other Public Bodies

- interministerial bodies
- national, regional and prefectural committees

#### Non Governmental Organisations

##### Social and environmental NGOs

- Local
- Guinean
- International
- Labour organisations/trades unions

#### Commercial interests

- Local businesses/merchants/entrepreneurs potentially affected by land acquisition and other social and environmental impacts
- Local and national businesses providing goods and services to the Project
- Other mining businesses
- Business and industry associations

#### Affected communities and individuals

- Inhabitants of towns and villages potentially affected by land acquisition and/or other social and environmental impacts
- Users of land and resources affected by the project – farmers, pastoralists, livestock keepers, market gardeners, fuel collectors, fishermen, hunters, gatherers
- Other people present in the area of influence of the Project – transient populations, migrants, visitors, etc
- Representatives of affected people such as:
  - traditional leaders
  - religious leaders
  - teachers and doctors
- Village committees:
  - water management committees
  - in-migration committees

#### The general public and civil society

- Any member of the public
- *Ressortissants*
- *Forces vives*
- Academic and research institutions

#### International organisations

- UN agencies
- Multi-lateral development agencies
- Bi-lateral development agencies

The list of stakeholders identified to date in each group is presented in Annex A. To date the list includes mainly organisations and their representatives rather than affected individuals. This is because the precise boundaries of land to be affected by the Project are still being established and affected individuals have yet to be identified. The list of stakeholders will be extended as the SEIA and PARC studies progress and as the area of influence of the Project is more precisely defined. New stakeholders are expected to come to the attention of the Project through engagement activities, field work and unsolicited contacts made with the Project.

The majority of organisations identified in Annex A have already had some contact with the Project.

### 3.3 Characterisation and Proposed Approach for Stakeholder groups

This section describes the types of organisations and individuals identified as falling within each group and provides an overview of the proposed approach to engagement with them. Information on the specific stakeholders identified to date within each group is provided in Annex A and further details on planned engagement actions are provided in Section 4.

#### 3.3.1 National Government Authorities

National authorities are defined as those agencies of the Guinean government who have the power to regulate or otherwise influence the Project in terms of establishing policy, granting permits or other approvals for the Project, and monitoring and enforcing compliance with Guinean Law throughout all stages of the Project life-cycle (planning, construction, operation and decommissioning). It is important to engage and establish a continuing dialogue with these national authorities at an early stage.

National authorities will be provided with information about the Simandou Project first during scoping of the SEIA. They will then be engaged with on a continuous basis to ensure that they understand what is happening and are in a position to consider the Project activities in their policy-making, regulatory and other duties and activities.

#### 3.3.2 Regional and Prefectural Administrations

Several regions, prefectures and sub-prefectures will be impacted by the Simandou Project. These authorities will also be engaged during scoping and then by ongoing dialogue at all later stages of the Project

so that they understand what is happening in their areas and are in a position to consider the Project activities in their policy-making, regulatory and other duties and activities.

### 3.3.3 Local Administration

At the local level, below the sub-prefectures, the decentralisation system in Guinea distinguishes between rural and urban areas. In urban areas, the territory is divided into *mairies de communes urbaines* (led by elected mayors) and, then into *quartiers* or neighbourhoods (presided over by *presidents de quartiers*). In rural areas, the territory is divided into *Communautés Rurales de Développement* (CRD) and then into *districts* each of which is led by a *Président* (districts are also divided into *secteurs* led by a *Chef de secteur*). Engagement with leadership at the community level is discussed in Section 3.3.5.

Local administrations will all be engaged on an ongoing basis regarding all aspects of the Simandou Project that may impact their regulatory and other responsibilities.

Meetings with the local administration will follow local practices and be held prior to any wider communication in the villages in order to respect the political and social structures.

### 3.3.4 Other Advisory and Public Bodies

In addition to the government ministries with interests in the Project a number of special bodies have been established to address issues relating to large projects and to the Simandou project in particular. These include an Inter-ministerial Committee established for the mining sector, national and prefectural committees established to monitor the environmental and social aspects of the Simandou Project, and management committees for the mining sector and forests. The Project has already established relationships with all of these and these will be continued throughout all future stages of development.

### 3.3.2 Project Affected Communities and Individuals

This group includes all people who may be directly or indirectly affected by the Project's presence and activities and their representatives (leaders and other influential people). It includes people living on land affected by the Project, either through direct land take or by social and environmental impacts such as loss of access or pollution of air and water, and other people who visit or use land or resources that may be affected.

Affected individuals may be:

- registered and customary land owners whose land is taken for or affected by the Project;
- other residents and occupiers whose land is taken for or affected by the Project;
- other people whose use of or access to land and resources is affected by displacement or by other impacts such as pollution; these may include subsistence and commercial farmers, pastoralists, livestock keepers, market gardeners, fishermen, hunters and gatherers, users of water, fuelwood collectors, etc.

Affected individuals will be consulted directly and via their representatives including elected and traditional leaders, and other influential people within communities such as religious leaders and school principals.

In addition the Project will consult specifically with people representing potentially vulnerable or marginalised groups such as women, young people, landless people, the sick and disabled, internally displaced, ethnic minorities and some in-migrants.

Within the category of in-migrants specific attention will be paid to those who may be considered vulnerable. In-migrants may be defined broadly as people who originate from outside the Project area and who are motivated to move to the Project area by perceived economic opportunities or benefits associated with the development of the Project. Criteria that could lead to vulnerability within in-migrants are explained in Table 3.1.

**Table 3.1 Criteria for Vulnerability of In-Migrants<sup>1</sup>**

In-migrants are not a vulnerable category *per se* and comprise people that arrive under a broad range of social and economic conditions. However certain in-migrants may become more socially and economically vulnerable as a consequence of their movement into a Project area. Such vulnerability may derive from, or be exacerbated by cultural isolation from being in a new area, the absence of family or community support networks and the socio-economic stresses associated with mobility. The vulnerability of in-migrants may be identified with reference to the following:

1. Age-related factors: The age profile of in-migrants is generally relatively young and may include a significant proportion of unaccompanied minors. Children may be drawn to project areas by a range of factors, including high levels of poverty at home or dysfunctional family environments brought about by the effects of armed conflict or extreme poverty. As in-migrants, often without any protective networks from their home communities, children (and young adults) may be especially vulnerable to further impoverishment, unsafe labour practices, sexual exploitation and exposure to social pathologies such as illicit narcotics.
2. Gender-related factors: Whilst it is generally assumed that the majority of in-migrants to Project areas are male, in-migrant communities may include significant numbers of women and girls. Once again, the absence of familiar community and family networks of support brought about by in-migration may increase gender-related vulnerabilities. Such vulnerability may lead to increased levels of gender-based violence towards women and various forms of sexual exploitation.
3. Ethnicity and national identity: In the context of project development, local identity may become a significant marker of entitlement to project benefits, especially where limited project opportunities are subject to intense local competition. Persons of specific ethnicities may be represented as “outsiders” and prevented from accessing project benefits. In many cases, this will include in-migrants, particularly where they are perceived to have advantages over the local population (such as greater job skills or experience in accessing similar project benefits). Similarly, foreign in-migrants from neighbouring countries may also be deprived of access to project benefits, regardless of the legality of their presence, on grounds that they are national outsiders. The absence of entitlement on the basis of ethnic and national identity may increase the vulnerability of persons or groups of persons to impoverishment, discrimination and economic exploitation.
4. Refugees and internally displaced persons: Refugees and internally displaced persons represent a particularly vulnerable category of persons. Such vulnerability may be increased in situations where refugees or other displaced persons are drawn towards project developments in the hope of improving their lives and livelihoods, where they may venture beyond the reach of the basic forms of state protection that they enjoy as refugees (or internally displaced persons).

At the first stage in the programme of stakeholder engagement (i.e. during SEIA scoping), attention will be focussed on representatives of affected communities, interest groups and vulnerable groups who will be identified and invited to consultation meetings. Contact with individuals will follow once detailed PARC consultations commence (see Section 4.9). NGOs representing specific interests will also be consulted as explained in Section 3.3.6. Specific meetings will be arranged with representatives of potentially vulnerable groups who may not be reached through traditional leadership structures. Community Based Organisations (CBOs) will also be consulted where there is opportunity for benefits to be provided through, for example, social investment initiatives.

Consultation will start during SEIA scoping and elected and traditional leaders, village councils and the leaders of other groups in the village, such as women or youth groups, will continue to be engaged about all aspects of the Simandou Project that may impact on their community, lands and other assets.

All meetings will follow local practices and norms. Meetings with traditional and religious leaders will be held prior to any wider communication in the villages in order to respect traditional structures.

<sup>1</sup> International Finance Corporation (IFC) 2006. Performance Standard 1: Social and Environmental Assessment and Management Systems. 30 April 2006.

International Finance Corporation (IFC) 2009. *Projects and People: A Handbook for Addressing Project-Induced In-Migration*. Washington D.C.: International Finance Corporation.

Synergy 2007. *Community Development Framework Study for the Mining Sector in the Republic of Guinea*. Oxford: Synergy.

All affected communities and groups will be made aware of the Project grievance mechanism (see Section 6).

### **3.3.3 Civil Society and Non-Governmental Organisations**

This group includes all other people in society who may have an interest in the Project and its social and environmental aspects and non-governmental organisations representing their interests. It includes members of the wider general public in Guinea and further afield, civil society organisations such as religious groups, cooperatives, professional associations, cultural groups and citizens' associations (*ressortissants*), and environmental and social groups. It also includes universities and other academic and research institutions undertaking work relevant to the Project (e.g. on mining, sustainability, social and environmental issues, local and regional development, etc) who may have views on the Project or information that will be useful for the assessment of Project impacts.

Opportunities for their participation in the project will be provided by direct contact with known groups during scoping, and by wide publicity for the stakeholder engagement plan and events enabling other groups and individuals to make contact with the Project.

Consultation with civil society and local, Guinean and international non-governmental organisations (NGOs) representing groups and interests that may be affected by the project will be crucial to a credible SEIA process. During scoping engagement will focus on representative organisations to understand their views and gather information which may be useful for the SEIA. A transparent dialogue will be conducted with NGOs by disseminating information through a variety of routes including letters and on the Project website and this will be followed up with meetings and individual discussions where this may be of mutual interest.

At later stages engagement will widen to include the wider public in the project area and further afield, through wide dissemination of Project information and local consultation events.

### **3.3.4 Commerce and Industry**

A range of different types of commercial organisations may be interested in the project including:

- local entrepreneurs (both companies and individual farmers, traders, merchants etc) who may be adversely affected by displacement and other social and environmental impacts;
- local entrepreneurs and businesses from elsewhere in Guinea who may gain benefits by providing goods and services to the Project and participating in social investments by the Project; and
- other mining companies working in the local area and elsewhere in Guinea.

These organisations will be contacted through their local communities and via associations representing business and industry, with follow up with individual entrepreneurs where appropriate. This will be in addition to direct contact with potential suppliers that will be undertaken as part of the normal business of the Project. As the Project develops and new contractors and service providers are identified, it is likely that these businesses will become important stakeholders as they establish contractual relationships with the Project.

Contacts with the mining sector will be continued through the Chamber of Mines in which Simfer is actively involved. A Simfer representative serves as a main interlocutor in the Chamber's working groups in which public affairs activities and significant issues, such as transport and influx, are discussed and managed regionally.

### **3.3.5 Multilateral and Bilateral International Organisations**

A range of different international organisations may have an interest in the project and may have useful data or insight into local and national issues of relevance to the Project. These include UN agencies, African and West African and other multilateral and bilateral development agencies. These organisations will be contacted during scoping and dialogue will be maintained in the future where they express an interest in the Project.

## **4 Stakeholder Engagement Activities**

### **4.1 Introduction**

This Section outlines the engagement activities that will be undertaken during the SEIA for the Project. At this stage the aim will be to provide information about the Project and to understand potential impacts and

opportunities as perceived by local communities and other stakeholders. These issues can then be taken into account in developing the project design and mitigation to minimise adverse impacts and maximise the benefits of the Project. SEIA engagement activities will provide an opportunity for affected and interested people to express views and concerns about impacts and mitigation measures associated with the Simandou Project, and allow the Project to consider and respond to these in undertaking the SEIA and developing a Social and Environmental Management Plan for the Project. The key stakeholder engagement activities during the SEIA will be:

- the consultation on the scope and ToR for the SEIA;
- the follow up engagement during the SEIA studies; and
- the disclosure of the SEIA draft report.

A brief summary of plans for future stages is provided at the end of the section.

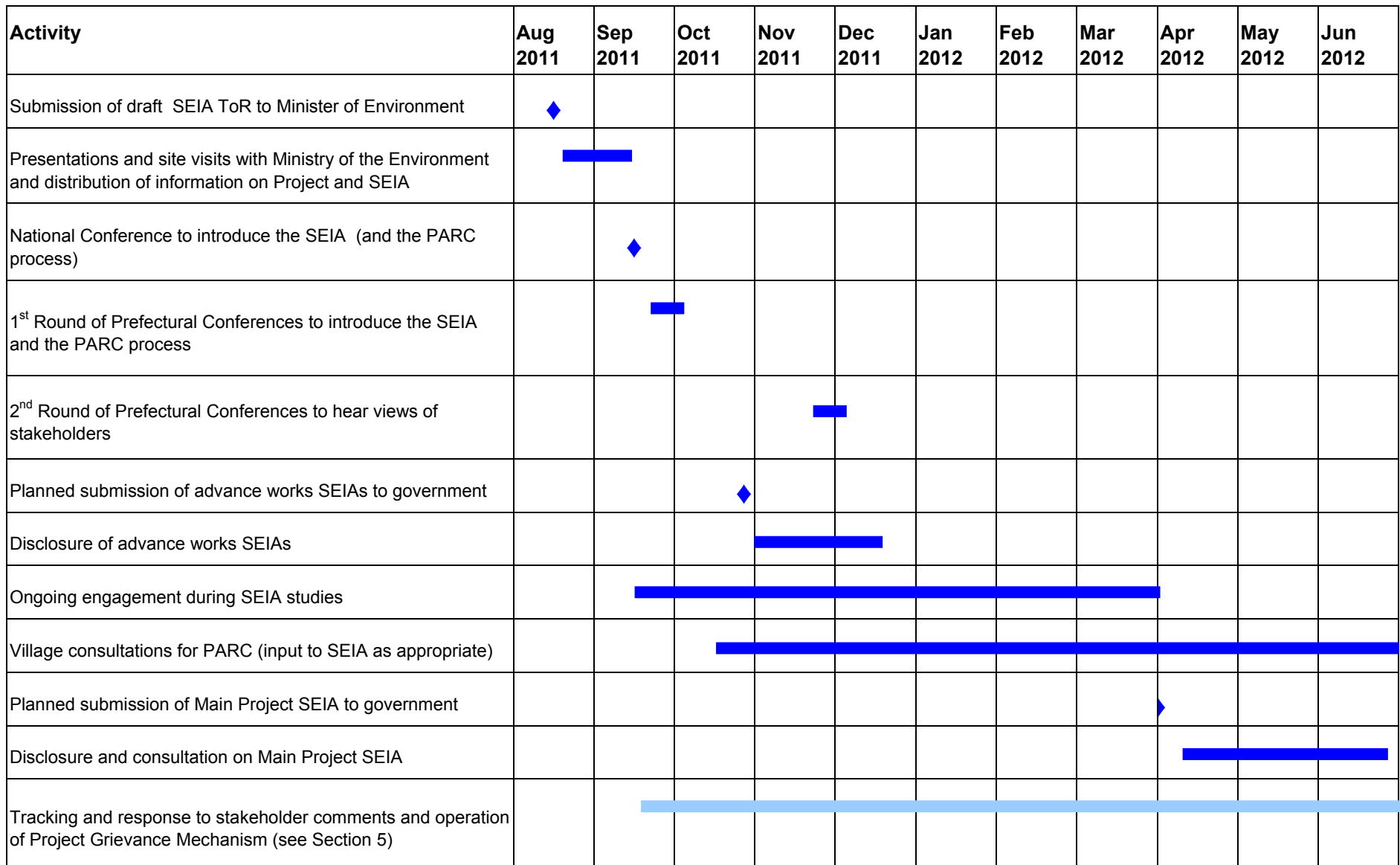
The Settlement Agreement between the Government of Guinea and Simfer requires the first ore from the mine to be exported by mid 2015. To allow this target to be reached the Project is being developed in stages and the SEIAs for certain components are being prepared in advance of the main SEIA. These include development of a marine offloading facility in the vicinity of the main port, construction camps and supply bases along the rail corridor, quarries and road improvements. SEIAs for these are planned to be submitted for approval from the autumn of 2011 with the SEIA for the main project being submitted in Spring 2012. The stakeholder engagement schedule takes these stages into account as shown in Figure 4.1.

The planned activities are aligned with and build on the stakeholder engagement activities that have already been undertaken principally in the mine area and will also link into and draw upon the local engagement which is planned as part of the PARC process over the forthcoming months (see Section 4.9).

The sections below provide more information on each activity and on the tools / materials that will be used in support of the engagement activities.



**Figure 4.1 SEIA Engagement Schedule**



## 4.2 Consultation on SEIA Terms of Reference

The first stage in the SEIA engagement is the consultation on the scope and Terms of Reference for the Project SEIA. This will commence with submission of the Draft ToR to the Minister of the Environment. The ToR will describe the Project and present the proposed scope of the SEIA for comment.

Opportunity to comment on the draft ToR will be provided by various methods:

1. A series of meetings will be organised to present the Project and the draft ToR to stakeholders (see Sections 4.3 and 4.4). Press releases to newspapers, radio and TV will be used to publicise the launch of the SEIA consultation process.
2. A short project information brochure will be prepared in French and English. This will present a concise and simple description of the Project with pictures and diagrams to communicate to the lay reader. It will be sent to organisations on the current stakeholder list including local and international NGOs, business and industry associations, and international institutions (see Annex A) with an invitation to review and comment on the Project and the draft ToR. The brochure will provide contact details for further information, a link to the website (see below), and a comment form which can be used to submit comments and questions to the project. All feedback and comments will be tracked (see Section 4.8) and timely responses will be provided. Where comments constitute grievances they will be handled via the Grievance Mechanism (see Section 5).
3. A Project website will be established where this information will also be available for review. This will be a dedicated SEIA page on the Simandou website designed to inform all affected and interested parties who have access to the web, including international NGOs, about the Project. The webpage will be in French and English and will provide links to available documents including the ToR and this SEP. It will provide further contact details and an on-line comment form which visitors can use to submit comments and questions.
4. The brochure will also be made available in Simfer's Info-Shops. The Info-Shops are satellite Simfer offices manned by Simfer staff and set up to explain the Project and respond to enquiries from the community. Two Info-Shops are already in place in Beyla and in Kérouané. A third is being constructed in the Moribadou Training Centre and a fourth is under discussion with the local authorities in Macenta. Two more are planned in Forécariah and Mamou by the end of 2011. Info-Shops are open on market days (on Saturday in Beyla and Thursday in Kérouané), to facilitate access by people from town and surrounding area.

## 4.3 National Conference

The first major event in the SEIA consultations will be a national conference in Conakry in September. This will be for an invited audience comprising:

- government departments including the Ministries of Mines, Environment, Urbanism, Decentralisation, Planning, Agriculture, Large Projects, Public Works, Transport, Water and Forests;
- Governors of Regions in which the Project is located;
- Prefects of Prefectures in which the Project is located;
- Guinean and international NGOs;
- Other international stakeholders;
- Academic and research institutions;
- *Ressortissants*.

At this event the Project team will present:

- the Project proposals and the background to their development;
- the purpose and planned scope of the SEIA study;
- how social and environmental impacts will be identified, assessed and mitigated;
- how stakeholders can support the SEIA by providing useful information;
- how people and organisations can express their views and concerns about the Project and how these will be taken into account; and
- how grievances can be raised and how they will be addressed.

The national conference will also be used to launch the PARC process explaining how the Project will plan and undertake the acquisition of land and the compensation and resettlement of affected people.

Invitations to this meeting will be issued in advance and will be followed up to confirm attendance. Where organisations are not able to attend they will be sent information and invited to comment in writing. Assistance with travel will be provided for Guinean organisations attending from outside Conakry.

Information available at the conference will include the project information brochure and photographs, posters, videos, models and other non-technical summary materials designed to ensure stakeholders understand the Project, its potential impacts and the SEIA, PARC and stakeholder engagement process.

#### **4.4 Prefectural Workshops**

SEIA and PARC consultation workshops will also be held in the 10 prefectures affected by the Simandou Project (Forécariah, Kindia, Mamou, Faranah, Kouroussa, Kissidougou, Kankan, Kérouané, Macenta and Beyla).

Invitations to these workshops will be sent to:

- Prefects, Sub-Prefects and their administration officials;
- Mayors of communes urbaines within which the Project is located;
- Presidents of CRDs within which the Project is located;
- Religious leaders;
- representatives of CBOs and other local NGOs and associations

The workshops will also be open to any interested party to attend. To publicise the meetings press releases will be sent to local media and announcements will be made on local radio two weeks prior to each conference. Information on the workshops will also be provided in Info-Shops and Info-Posts. Info-Posts are project notice boards. These have been established for the Project in Moribadou, Mafindou, Banankoro, Wataferedou, Traoréla and Nionsomoridou. As well as the notice board which is used to display information about the Project, upcoming SEIA events, deadlines for submitting comments, etc, there is also a letter-box where people can leave comments or enquiries. Recruitment opportunities are also posted on these boards but these will be kept separate from SEIA information. The boards are looked after by Simfer Community Liaison Officers (CLOs) and information is provided in French. Community Liaison Officers also explain the posted information in the local language to the village elders and authorities.

There will be three rounds of prefectural Workshops.

- round 1 will be principally designed to inform people about the Project and the launch of the SEIA and PARC processes, to explain the processes and how people can get involved, and to invite comments on the ToR;
- round 2 will focus on hearing their views and concerns;
- round 3 will take the form of *réunions de restitution* designed to provide feedback to stakeholders on the outcome of the process, and to disclose and seek comment on the SEIA.

Dates for the second and third round of meetings will be announced at the preceding meetings.

Additional materials will be prepared for these meetings designed for a more local audience and taking into account socio-economic factors such as literacy rates. Facilitators will be trained to ensure that people can participate in their local language.

#### **4.5 Ongoing and Village Level Consultations**

As the SEIA studies progress contact will be maintained with stakeholders who have expressed an interest in the Project by issuing regular updates on the web, in the press, in Info-Shops and Info-Posts, and through other communications. Regular contact will be maintained with national, regional and local regulatory authorities and follow-up meetings will be held with other stakeholders as needed.

During this time village level consultations will also commence as part of planning for the PARC. These will focus first on localities affected by the advance works and then extend out to the wider Project area. Whilst the focus will be on consulting affected communities about land acquisition and the PARC process, opportunities will also be taken to invite comments about the wider social and environmental impacts of the Project for input to the SEIA studies. Village, user group and household surveys carried out during baseline studies are also providing valuable information

#### **4.6 Disclosure of Advance Works SEIAs**

SEIAs for advance works are expected to be submitted for approval at various times during the last quarter of 2011 and into early 2012. These will be presented to the relevant environmental authorities at national and local levels, and will be distributed to the regional, prefectural, sub-prefectural and village administrations in affected localities and to other local stakeholder, and made available on the web.

#### **4.7 Main Project SEIA Disclosure**

Once the main SEIA is completed (planned Spring 2012) it will be disclosed through a further programme of publications and events in accordance with the Guinean EIA Regulations and international standards, so that the views of affected and interested parties can be taken into account in finalising the assessment. The draft SEIA report will be made widely available to government, the public and NGOs through dissemination of hard copies of the full report, publication and display of summary materials, and release on the Project website and on the websites of the World Bank and IFC.

Further public meetings will be organised by the Project on behalf of the government and a series of exhibitions/ open houses will be set up, each for a period of several days, at a number of locations around the mine, along the railway corridor and at the port. These will be designed to be accessible to the local and wider public and will provide information about the Project, the results of the SEIA and the plans for social and environmental management of the Project.

Affected and interested parties will be able to submit comments on the SEIA results by a variety of routes including at exhibitions, open houses and meetings, in written submissions and via the web.

#### **4.8 Stakeholder Tracking and Response**

Throughout the stakeholder engagement programme all issues raised by stakeholders will be recorded in a logical and systematic way using the Project's established Information Management System KIBARO.

Once a comment has been recorded it will be passed to the appropriate part of the Project team to consider and provide a response and this will be recorded in KIBARO. Where questions are raised a response will be provided in an appropriate manner. If a comment is judged to constitute a grievance it will be handled through the Project's Grievance Mechanism (see Section 5).

A report on the results of stakeholder engagement during the SEIA will be provided in the draft SEIA report and a report on the results from disclosure of the draft report will be included in the final SEIA report.

Further information on monitoring and reporting is provided in Section 6.

#### **4.9 Stakeholder Engagement for PARC**

The development of the *Plan d'action de réinstallation et de compensation* (PARC) is just starting and a further programme of stakeholder engagement activities will be implemented to support this process. This will run in parallel with and be integrated into the SEIA engagement activities. An updated Stakeholder Engagement Plan will be issued shortly to include this programme.

This will include village visits, household surveys and focus group discussions in areas affected by physical and economic displacement. The aim will be to capture and understand the current socio-economic characteristics of affected communities, including demographics, health, land use and ownership. Although the focus will be on PARC, these activities will also provide an opportunity to disseminate information on the Project and gather views relevant to the SEIA where timing permits. This will avoid duplication of effort and consultation fatigue. Any views or concerns raised during the interview process will be recorded on KIBARO, passed to the appropriate Project team members for consideration, and responses provided as required.

#### **4.10 Stakeholder Engagement in Future Phases of the Project**

The Project is committed to continue engaging actively with stakeholders throughout the life of the Project, from the current stages of planning and design, through construction, into operation, and eventually to closure and decommissioning. This SEP will therefore be developed as the Project moves into these later stages using effective and culturally appropriate methods to maintain a two-way dialogue with those affected, both positively and negatively, by the Project. The aim will be to ensure that the Project remains in contact with all interested parties and cognisant of their concerns, and that these are addressed in an effective and timely manner. At each stage a detailed schedule of activities and events will be developed and widely disseminated so that people know how to interact with and participate in the Project. As noted above the first revision to this SEP is expected shortly and will address engagement activities during the initial development

of the PARC. This is likely to be followed by a further issue in Quarter 2 2012 focussing on disclosure of the draft SEIA Report and later stages of PARC development and implementation.

## 5 Grievance Mechanism

### 5.1 Introduction

In accordance with international good practice the Project has established a specific mechanism for dealing with grievances about the Project. A grievance is a complaint or concern raised by an individual or organisation who judges that they have been adversely affected by the Project during any stage of its development. Grievances may take the form of specific complaints for actual damages or injury, general concerns about project activities, incidents and impacts, or perceived impacts.

IFC standards require Grievance Mechanisms to provide a structured way of receiving and resolving grievances. Complaints should be addressed promptly using an understandable and transparent process that is culturally appropriate and readily acceptable to all segments of affected communities, and is at no cost and without retribution. The mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for both the company and stakeholders. The mechanism must not impede access to other judicial or administrative remedies.

A Grievance Mechanism for the Simandou project has been in place for some time. It provides a formal avenue to register stakeholders' concerns and for these to be addressed in good faith and through a transparent and impartial process. Grievances are monitored to provide signals of any escalating conflicts or disputes.

This section sets out the current grievance mechanism which will continue to be used during the SEIA and following phases of stakeholder engagement.

### 5.2 Grievance Principles

The Simandou grievance mechanism is based on the following principles:

- **Transparency and fairness:** The process for grievance resolution is transparent, in harmony with the local culture and in the appropriate language. The procedure has been designed in collaboration and partnership with communities. It explicitly assures potential users that the mechanism will not impede their access to other judicial or administrative remedies.
- **Accessibility and cultural appropriateness:** Every member of the community or groups has access to the grievance procedure. Any individual or group that is directly or indirectly affected by the Project's and its contractors' activities, as well as those who may have an interest in the project or the ability to influence its outcome, either positively or negatively, can raise a grievance.

Public information sessions have been held around the mine with the communities, vulnerable groups, local authorities, traditional and customary authorities, local Non Governmental Organizations (NGOs) and civil society to verbally inform them of the availability of the system and procedure. As part of the SEIA stakeholder engagement activities, the grievance procedure will be presented and explained at the port location and along the rail route. Rail and Port Community Liaison Officers will be responsible for informing local communities of the existence and availability of the mechanism. All engagement activities undertaken during the SEIA will provide information about the grievance mechanism.

In order to reach the widest audience, the grievance procedure is available in English and French. A simplified version is available for external stakeholders.

- **Openness and communication regularity:** There are multiple channels available for individuals and groups to choose their preferred method of lodging grievances:
  - Simfer's satellite offices in Beyla and Kérouané and by the end of 2011 in Moribadou, Macenta. Mamou and Forécariah;
  - all Simfer Project staff but in particular, the Simfer Community Liaison Officers;
  - through the local or national authorities;
  - through traditional authorities or civic leaders (e.g. religious leaders).
- Channels of communication are kept open throughout the process of addressing each grievance and up to 3 months after the situation has been resolved.

- **Written records:** All grievances are registered on a Grievance Form, logged in the Simandou Information Management System KIBARO, and tracked through to resolution.
- **Dialogue and site visits:** All grievances are considered to warrant discussions with the complainant and a site visit to gain a first-hand understanding of the nature of the concern. The purpose of the visit is to verify the validity and severity of the grievance.
- **Timely resolution:** The Project aims to resolve all grievances within three months.

### 5.3 Process

Based on the principles described above, the grievance mechanism process involves 4 stages:

1. receiving and recording the grievance;
2. acknowledgement and registration;
3. site inspection and investigation;
4. response.

#### 5.3.1 Receiving and Recording the Grievance

Grievances may be lodged by a variety of different means including direct reporting to the Project via Community Liaison Officers, at Project Info-Shops, at Project sites, by posting in Info-Posts, by telephone, by mail or on the web. All Project staff are informed that they must pass all submissions that could be considered to form a grievance to the Communities Team as soon as possible after they are received. Details of the person lodging the grievance will be noted. All grievances will be recorded by a Communities Team Superintendent who is nominated as the Grievance Manager in charge of the Grievance Mechanism. Village leaders and government departments will also be advised to pass any complaints they receive to local Community Liaison Officers from where they will be forwarded to the Grievance Manager.

The Grievance Manager will record each grievance on a standard Grievance Form. The Grievance Manager will ensure that the name of the village, the date recorded, the name of the complainant and the name of the person that received the grievance are noted. If the grievance is received directly by the Grievance Manager, it will be recorded directly into the Grievance Form.

#### 5.3.2 Acknowledgement and Registration

Once the grievance is recorded, the stakeholder will be provided with a copy of the Grievance Form signed by the complainant and by the Grievance Manager. This copy serves as an acknowledgment that the grievance has been received. The Grievance Manager will register the grievance in the KIBARO system.

#### 5.3.3 Site Inspection, Investigation and Resolution

The Grievance Manager will organise a site inspection, undertaken either by himself or by an assigned member of the Communities Team. The purpose of the site inspection is to check the validity and severity of the grievance. The inspection will be undertaken within seven days of receiving the grievance. The assigned individual will then work with other relevant members of the Project team to investigate the problem and identify measures to resolve the grievance as appropriate. This could involve provision of information to clarify the situation, undertaking measures to remedy actual problems or compensate for any damage that has been caused either by financial compensation or compensation in-kind, and introduction of mitigation measures to prevent recurrence of the problem in the future. Where a grievance is found to be not a real problem a clear explanation will be provided to the complainant.

#### 5.3.4 Response

A formal response detailing how the grievance has been resolved will be provided to each complainant within 30 days where possible and at the most within 3 months. Where resolution is delayed the complainant will be provided with regular updates on progress.

## 6 Monitoring and Reporting Stakeholder Engagement Activities

### 6.1 Monitoring Stakeholder Engagement Activities

It is important to monitor stakeholder engagement to ensure that consultation and disclosure efforts are effective, and in particular that key stakeholders such as local communities, have been meaningfully

consulted through the process. Stakeholder engagement monitoring is managed through the Project's Social and Environmental Management Information System KIBARO.

Monitoring will include:

- auditing implementation of the stakeholder Engagement Plan;
- monitoring formal and informal consultation activities conducted with communities and government authorities;
- monitoring the effectiveness of the engagement processes in managing impacts and expectations by tracking feedback received from engagement activities and recording and tracking commitments made to communities; and
- monitoring any grievances received and their resolution.

## **6.2 Reporting Stakeholder Engagement Activities for the SEIA and PARC**

Performance will be reviewed quarterly against the Stakeholder Engagement Plan. The report will include, but not be limited to, the following:

- materials disseminated: types, frequency, and location;
- place and time of formal engagement events and level of participation including by specific stakeholder groups (e.g. women);
- numbers of visitors to the Project Info-Shops (Beyla, Kérouané, Moribadou and others as they develop), and comments received by other routes (website, Info-Posts, mail, phone, personal visits);
- numbers and types of stakeholders contacted by mail, webpage and other means of communication;
- comments received by government authorities, village leaders and other parties and passed to the Project;
- number of comments by topic and type of stakeholder, and details of feedback provided;
- surveys of community attitudes and perceptions; and
- numbers and types of grievances and the nature and timing of their resolution.

Quarterly reports will summarise all activity for the period, and provide a summary of issues raised and how they have been addressed, including timeliness of responses and remedial, compensation and mitigation measures to address grievances, and analysis of trends in key performance indicators. These will include:

- total numbers of stakeholders engaged in each group;
- geographic location of stakeholders across the Project footprint and elsewhere;
- numbers of comments and queries received and responses given;
- issues raised and levels of support for and opposition to the Project;
- numbers of grievances lodged;
- time to resolution of grievances.

## **6.3 Annual Reporting**

A Stakeholder Engagement Report will be published annually including a summary of issues raised by stakeholders, numbers and subjects of grievances, a summary of key actions taken to address concerns, analysis of trends in KPIs, and plans for engagement in the next period.

## Annex A Current List of Stakeholders (August 2011)

### 1. National Government Authorities

Ministry of Mines and Geology

Ministry of Environment

Direction of Water and Forests

*Bureau Guinéen d'Evaluation des Etudes Environnementales (BGEEEE)*

Ministry of Habitat and Urbanism

Ministry of Decentralisation

Ministry of Agriculture

Ministry of Public Works

Ministry of Transport

Ministry of Planning

Ministry of Social Affairs

Ministry of Energy and Hydraulics

Ministry of Fisheries and Aquaculture

Minister advisor to the President in charge of Mining

### 2. Regions, Prefectures and Sub-Prefectures

Region	Prefecture	Sub-prefecture
Kindia	Forécariah	Kabak
		Forécariah Centre
		Moussayah
		Sikhourou
	Kindia	Kindia Centre
		Madina-Oula
Mamou	Mamou	Mamou Centre
		Soyah
		Ouré-Kaba
Faranah	Faranah	Marella
		Sandeniah
		Hérémakonon
		Faranah Centre
		Gnaléah
		Tiro
	Kissidougou	Albadaria
Kankan	Kouroussa	Douako
	Kankan	Tokounou
		Mamouroudou
	Kérouané	Komodou
		Kérouané Centre
		Kounsankoro
N'Zérékoré	Macenta	Sibiribaro
	Beyla	Beyla Centre



Region	Prefecture	Sub-prefecture
		Nionsomoridou

### 3. Advisory and Other Public Bodies

Administration and Control of Large Projects

*Comité national de suivi environnemental et social (CNSES)*

*Comité préfectoral de suivi environnemental et social (CPSES)*

*Centre de gestion environnementale des Monts Nimba et Simandou (CEGENS);*

*Comité de gestion forestière du Pic de Fon (COGEF);*

*Centre Forestier de Nzérékoré (CFZ);*

Simandou Mining Convention Negotiating Committee

### 4. Towns and Villages in Project Area

#### ***Beyla Prefecture (Mine Area)***

All urban sectors of CU of Beyla, Moribadou, Traorela, Baladou, Banankoro, Foma, Gouekoro, Kankoro, Kéoulendou, Koimoridou, Mafindou, Morisangaredou, Nionsomoridou, Piyaro, Siatouro, Thia, Wataferedou 2, Bangalydou, Boola 1 et 2, Boubaro, Fandou, Gbagbadou, Kamandou, Kissiboula, Mamoridou, Mimaro, Moribiendou, Niadou, Sibiridou, Sondou, Soumailadou, Soyaro, Tamikola.

#### ***Macenta Prefecture (Mine Area)***

Lamandou, Banko, Dandano 1 et 2, Korela, Kotia, Mamouroudou, Mandou, Naouinzou, Orono, Siafarala, Tourela (Banko), Kouankan centre, Bonodou, CFD of Kouankan.

#### ***Kérouané Prefecture (Mine Area)***

Seydou, Naniferedou.

#### ***Forecariah Prefecture (Port Area)***

Touguiré, Kaback, Matakang, Semen, Bonko, Harcia, Maligueya, Gbin, Tiron, Komodia, Singuilin, Gore, Missira, Yélibané, SiniKatonko, Baréna, Kaleiré, Koundébounyi, Gninyi, Souguébounyi, Khaliya, Kiaka, Wendima 1, Guemetay, Gbéliya, Kissouki, Wendima 2, Zambo, Tolomolo, Bérébouni, Kitonki, Kinata, Bomodoua, Fanabaya, Mouki, Kaleyiré, Mangué, Kibéré, Ouiné, Dabonshoré, Bossimia, Fafendé, Bandabon, Kamalon, Kamen, Bonfi, Youlaya, Fria, Tonronya, Kassaré, Founrima, Boléma, Tombouléa, Kénendé, Youlayé, Bakia bolé, Serdia.

#### ***Other Prefectures (Railway Corridor and Early Works)***

To be determined

### 5. Commerce and Industry

Chambre des Mines de Guinée (Guinean Chamber of Mines)

SOGUIPAH

Union Préfectorale des Entrepreneurs de Beyla (UNIPB)

Antenne Préfectorale de la Chambre de Commerce de Beyla (CCIAG)

Union des Groupements Agricoles de Nionsomoridou (UGAN)

CENA

UGAN,

KCTC  
DJIGUI  
AM.CO.BAG  
*Union des Transports Mécaniques générales de Beyla (UTB)*  
E.CO.BA.T  
*Sékou Nilon et Frères*  
Africa Souvenirs  
PRIDE  
EDC  
ENCOPRESS  
BED  
GATEC  
*Union des Artisans du Kossadou*  
ADCAP  
*Forge Kourouma et Frères (FOKOMAF)*  
*Atelier de menuiserie*

#### **Other Mining Companies**

SMFG (Euro Nimba)  
SAG  
CBG  
SMD  
GAC  
Alcoa  
Alcan  
RTA  
Bellzone  
Vale

#### **6. Non-Governmental Organisations and Civil Society**

##### ***Guinean NGOs***

*Guinée Ecologie*

PRIDE  
APROFIG  
APEAE  
ADCAP  
BED  
BICIGUI  
CAFODEC  
CENA

AVPM

APEDEC

*Fédération des associations des mères d'élèves (FAME)*

*Réseau des Femmes du Fleuve Mano pour la Paix (REFMAP)*

*Protection de la femme et de l'enfance (ADCR)*

*Femmes Unies pour le Développement (FUD)*

*Association guinéenne pour l'allègement des charges féminines (AGACFEM)*

CNOSCG

*Organisation Guinéenne des droits humains*

*Ressortissants*

*Forces Vives*

### ***International NGOs***

Conservation International

Birdlife International

Flora and Fauna International

Royal Botanical Gardens, Kew

IUCN

WWF International

Wetlands International Africa (WIA)

FIBA

Population Services International

World Education Group

Africare

Catholic Relief Services (CRS)

Save the Children

*Faisons Ensemble*

### ***Academic and Research Organisations***

Boké Université *Institut des mines et géologie*

*Centre d'études de recherche en environnement (CERE)*

*Project de Gestion de Ressources Forestière (PGRF)*

## **7. International Organisations**

United Nations Development Programme – Growing Sustainable Business (GSB) Initiative

International Labour Organisation (ILO)

Food and Agriculture Organisation (FAO)

World Health Organisation (WHO)

United Nations Education, Scientific and Cultural Organisation (UNESCO)

International Monetary Fund (IMF)

World Meteorological Organisation (WMO)

International Maritime Organisation (IMO)

International Finance Corporation (IFC)

World Bank – Guinea

United States Agency for International Development (USAID)

*Agence Française de Développement* (AFD)

*Deutsche Gesellschaft für Internationale Zusammenarbeit* (GIZ)

Extractive Industries Transparency Initiative (EITI)