

Public Commitment Register - Progress tracker

Date 30/04/2021

#	Commitment	Responsibility	Update
1	Greenhouse Gas Emissions and Climate Change		
1.1	The Project will conduct a GHG emissions assessment and if the emissions exceed 100,000t CO ₂ annually, the project will commit to publically reporting these results.	Environment	Completed annually for 2018, 2019 and 2020.
1.2	The Project will develop a Resource Efficiency Management Plan that will include fuel efficiency, reduction of GHG emissions, control of water use, investigation on bioresource use and an examination of how revegetation could enhance greenhouse gas mitigation.	Environment	Solar water heating in place. External review scheduled in 2020 pushed out as a result of covid restrictions
2	Landscape and Visual Assessment		
2.1	Reclamation of exploration works (drilling pads, access roads) will be ongoing during the construction phase to restore and revegetate previously disturbed areas, which will not be affected by the operations phase of the Project. This will include redundant access roads and drill sites, provided they are not within the planned mine facilities.	Environment	Completed for initial exploration works, ongoing for more recent work
2.2	Native vegetation regeneration will be promoted in the locality, alongside planting of native trees, thorny vegetation, and shrubs, if appropriate. The project will establish a plant nursery and work with the communities to provide stocks for re-vegetation, including seed and vegetation collection. These will be used initially to produce trees for visual screening purposes, but will be expanded to cater for rehabilitation requirements, the objectives of which will be determined in partnership with the local communities. Rehabilitation of a range of vegetation types will be ensured. Vegetation restoration will generally use native species, ideally targeting project pre-impact vegetation types. Efforts to maintain or restore wetlands will be made. Exposed surfaces will be kept at a minimum.	E&S	Two community nurseries established in 2019 and 2020 to supplement BAM nursery with regards to the propagation of all-native species for rehabilitation . 3 ha revegetated in 2019, 12 hectares in 2020.
3	Air Quality, Noise and Vibration		
3.1	Regular monitoring will be performed at key locations in the Project area to include continuous monitoring of dust and particulate matter, NOx and SOx and noise in accordance with the Air Quality, Noise and Vibration Monitoring Plan.	Environment	Baseline completed. Monitoring continuous.
3.2	The Quarry Management Plan for Khoundinde quarry will be completed and implemented. This will include vibration monitoring, implementation of dust suppression activities, consultation and information sharing with Khoundinde village on the timing and frequency of planned blasting, safety awareness, and a pre-blasting survey of structures within the potential area of influence. Inspections will be made periodically after blasting to compare with baseline conditions.	Operations	Completed Q1 2017. Fencing & access control reinforced in 2019 around the quarry.
4	Soils and Land Cover		
4.1	The project will put in place erosion and sedimentation control measures during construction.	Environment & Ops	Superseded by establishment of storm & sediment controls around mining infrastructure, on an annual basis.
4.2	The project will prepare a Footprint Management Plan, including a procedure for Ground Disturbance and Clearing Permit.	Environment	Completed Q3 2016. GDCPs issued for all new landtakes, up to and including Pit 3 in Q4 2020.

4.3	In order to maintain agriculture development in the area, programmes to maintain soil fertility and restore soil structure that has been affected by slash and burn agriculture and nearby mining activities will be developed.	Social	Composting facility established at the waste treatment facility as well as in 8 community gardens established as part of BAM's livelihood restoration program.
4.4	Top soil management will be implemented to ensure proper rehabilitation.	Operations	Topsoil stockpiled and replaced within a 2 to 3 year period, thereby safeguarding fertility
4.5	Aftercare will be maintained for a minimum period of 2-year post-closure.	E&S/Operations	See closure framework
4.6	Roads will be constructed to limit erosion and sedimentation accumulation. Sedimentation ponds will be constructed with a proper assessment of surface water flowpaths and volumes.	Operations	Completed. Additional controls were introduced in 2019 and 2020, as water flowpaths & volumes are better understood. Road maintenance also reinforced before rainy season, to limit run off.
5	Surface and Water Resources		
5.1	River water level, flows and quality will be monitored periodically (Tansofa, Kissilin and Kinkon rivers) starting in Q4 2016.	Environment	Baseline completed. Monitoring ongoing though frequency has been reduced as a result of covid constraints
5.2	Ground water level and quality monitoring will be performed periodically in the monitoring wells drilled by the project and in community wells.	Environment	Baseline completed. Monitoring ongoing though frequency has been reduced as a result of covid constraints
5.3	A Water Management Plan will be prepared and implemented which will include minimization of ground water use, maximization of water re-use, criteria for water discharge quality, setting up metering devices to determine water usage, storm water runoff, separation of clean and contact water, and other.	Environment	Completed Q3 2016. Water usage declared to national authorities on an annual basis. 2020 declaration was introduced in January 2021.
6	Waste Management		
6.1	The project will aim to minimize waste generation by adopting the 4 Rs of waste management; reduce, reuse, recycle and recover. The project will locate and design waste facilities, including an incinerator, in accordance with WBG/IFC's EHS guidelines and Guinean regulations.	Construction	Project duration. Incinerator commissioned. Composting facility developed in Q4 2019, with a total of 11 tons of compost produced to April 2021
6.2	The project will examine if there are suitably licenced companies in Guinea that can recycle waste.	Environment	Organics composted on site. MoE certified structure called upon to manage tires and spent conveyor belt on behalf of BAM.
7	Biodiversity		

7.1	Alufer's Sustainability Policy reflects a commitment to achieving "no net loss" for biodiversity and "net gain" for critical habitat as per the IFC Performance Standards.	E&S	Completed Q3 2016, actualisé en 2020
7.2	A Biodiversity Road Map was prepared in April 2016 to reflect the agreed way forward on wording and commitments relating to compliance with PS6. It addresses the various steps required to complete the assessment in line with PS6. Alufer will undertake additional biodiversity surveys prior to construction.	Environment	Surveys completed Q1 2018.
7.3	The project will prepare marine, coastal and terrestrial habitat mapping prior to construction.	Environment	Completed Q1 2018
7.4	The project will prepare a Biodiversity Management Plan (BMP) which will include Marine and Terrestrial aspects and procedures to address sediment management, wildlife rescue and invasive species control. In addition, a Natural Critical Habitat Assessment (NCHA) as per IFC PS6 and a Biodiversity Action Plan (BAP) will be developed by the Project. An Offset Strategy will be developed, if required, for natural habitat that will be lost or degraded by the Project, including loss/gain calculations. These will be based on additional survey works to be carried out in 2016 and 2017. Alufer will engage with national and local government and NGOs on the set-up of the Offset via a stakeholder engagement process, and commits to ensure financial support for the Offset.	Environment	Biodiversity Management Plan completed Q1 2017, NCHA & BAP completed Q1 2018, Offset strategy completed Q2 2018. Residual impact assessment & monitoring program under review with support from Biotope (2020-2021)
7.5	The project will conduct an Ecosystem services review, determine how best to mitigate impacts and enhance potential benefits in a coherent and cross-cutting manner and provide and implement recommendations, including on biodiversity and cumulative impacts.	Environment	Completed Q3 2018
7.6	The Project will establish Community Conservation programs in partnership with local NGOs and/or national and local institutions regarding biodiversity conservation and natural resource management, including hunting and fishing.	E&S	Ongoing since 2017, with focus on primates and turtles. In 2020, a partnership agreement was also signed with the National Herbarium to extend this to flora.
7.7	A precautionary approach will be taken during construction until completion of the Natural and Critical Habitat Assessment (NCHA) to protect Critically Endangered and/or Endangered species, subspecies and populations.	Operations	NCHA completed Q1 2018
8	Social Dynamics		
8.1	The Project will prepare and implement a Land Access and Resettlement Framework (LARF) and 4 Land Access and Resettlement Action Plans (LARPs), including Livelihood Restoration Programmes (LRP) in compliance with IFC PS5 and Guinean requirements.	Social	LARF, LARP & LRP completed, and audited in Q1 2019. Implementation ongoing
8.2	The Project will prepare Resettlement Principles which will be based on IFC PS5 and Guinean requirements.	Social	Completed Q3 2016
8.3	Consultation and communications are integral components of the Stakeholder Engagement Plan (SEP). Disclosure of the ESIA, SEP, and LARF will be done in a timely manner to allow proper consultation and understand the requirements of the people affected by the project.	Social	Completed Q3 2016. Perception survey conducted in 2019.
8.4	The project will establish a formal stakeholder engagement process, including reporting to the government and local stakeholders as well as regularly share information about project development with the communities. This includes establishing focal points in the villages to ensure the messages are being shared and minimize conflicts and social tension.	Social	Project Duration. Focal points in 5 districts identified and duly enlisted for 12 months, until Q4 2019, with mixed results. Direct engagement with all parties preferred option since then.
8.5	A grievance mechanism procedure will be prepared and will be available for the entire duration of the project.	Social	Completed Q3 2016. Grievance mechanism reviewed in Q1 2020

8.6	The project will prepare an Influx Management Plan that will include an approach for workers' accommodation/housing and developing transportation routes for workers.	Social	Completed Q4 2016
8.7	Assistance programmes targeted at agriculture, agri-business, micro and SMEs activities in the local communities will be established and supported by the Project to reduce the impact of economic inequality.	Social	Initiated Q1 2017. On-going, as program has expanded to cover 10 villages in 2020.
8.8	Alufer will actively support and engage with the following committees: i) The Prefectural Development Committee (PDC) or Comité Préfectoral de Développement (CPD): it brings together all actors influencing the development of the Prefecture; ii) The Prefecture Environmental and Social Monitoring Committee (PESMC) or Comité Préfectoral de Suivi Environnemental and Social (CPSES): it monitors the E&S actions carried out by the mining operators in the Prefecture; and iii) The Resettlement and Compensation Committee (RCC) or Comité de Réinstallation et de Compensation (CRC): this committee approves of the field surveys process and the implementation of the LARP or PAR.	E&S	i) Established Q3 2017. Composition has since changed with role, focused on managing Local Development Fund. BAM continues to support & facilitate interaction with impacted localities ii) CPSES established Q1 2018, 3 meetings / annum, including public presentation of ESMP progress report. Last public meeting held in March 2021 iii) initiated Q2 2016, though supervision now undertaken at the level of each district. Contracts drawn up under control of a bailiff.
9	Labour and Working Conditions		
9.1	All workers will have access to a worker grievance mechanism. Where an Alufer contractor does not have a formal grievance process, the contractor will be invited to use a similar system as that used by Alufer.	HR	Initiated Q4 2016. Project duration
9.2	The Project will prepare a Retrenchment Plan for redundancies at the end of the construction and operations phases.	HR	Completed Q1 2017
9.3	Preparation of an employment and training plan in compliance with the Government and IFC guidelines.	HR	Completed Q1 2017
9.4	The project will prepare an Occupational Health and Safety Management Plan.	H&S	Completed Q3 2016
9.5	The project will prepare a Transport and Traffic Management Plan.	H&S/E&S	Completed Q3 2016
9.6	A local labour force database will be developed and communicated to all contractors. All contractors will use the database for unskilled positions. For other skills, the contractors and the project will first use the local labour force database.	HR	Completed Q3 2016. Database updated Q4 2017 and again in Q4 2018. No further update scheduled insofar as staffing needs largely satisfied
9.7	Employees and contractors will be required to comply with the Alufer Code of Conduct, with disciplinary consequences for non-compliance as well as with the Voluntary Principles on Security and Human Rights (VPSHR).	Operations	Code of conduct drawn up Q4 2016 and formally endorsed by Labour Inspectorate in 2019. Project duration
10	Socio-economic and Livelihoods		
10.1	A Local SME Business Development Initiative programme will be initiated during the construction period, including the development of a supplier register to inform a qualified bidder list.	Operations	Initiated Q1 2017. Project duration. Bauxite transportation opened up to local including community suppliers, in 2019
10.2	Alufer will comply with the disclosure requirements of the Extractive Industries Transparency Initiative (EITI) to report on all taxes and government payments. Pending Board approval, Alufer is willing to becoming a Supporting Company of EITI.	E&S	Annual, on demand from EITI secretariat.

10.3	Local inflationary effects will be monitored through tracking the cost of a “standard basket of goods” in selected representative villages over time.	Social	Initiated Q1 2018, with survey undertaken on biannual basis until suspended as a result of covid
10.4	A Procurement Policy will be prepared favouring local suppliers, when possible. Contractor agreements will include Procurement and Employment clauses favouring local communities and capacity building.	Commercial	Policy defined Q4 2016. Project duration
10.5	Alufer will work closely with community administrators to build capacity around budgeting and prioritisation of projects in the context of the Local Development Fund.	Social	As per updated regulations, contributing mines are observers with regards to the LDF's management. In this capacity, BAM has been able to support impacted communes with project prioritisation and the CPD with governance
11	<i>Land Use, Agriculture and Natural Resources</i>		
11.1	Access to land adjacent to the Project-affected area will be facilitated where it is safe to do so.	Operations	The land on either side of the lease is used by the communities there-established. As a result, greater effort has been placed on intensifying production
11.2	Project to minimize impacts on floodplains, extensively used by the communities for agriculture.	Operations	Completed Q1 2016. Floodplains have instead been converted to host market gardening activities in the dry season, providing alternative income for impacted communities. Additional work is scheduled in 2021 to protect some of these low lying areas through the rainy season.
11.3	The project will examine cumulative impacts if other large companies initiate activities in the area and information is in the public domain.	E&S	A dissertation is currently (2021) under preparation under BAM Environment Director's supervision to better understand how neighbouring firms view cumulative impacts and work towards establishing joint mitigation strategies & tools.
12	<i>Community Development</i>		
12.1	The following activities will be implemented in respect of vulnerable people affected by economic displacement: i) Assistance during the land acquisition and negotiation process including, at the stage of plot and landowner identification, individual meetings to explain eligibility criteria and entitlements, clauses in compensation agreements, grievance mechanisms etc; ii) assistance in the payment process (provision of transport to the bank for compensation payments, support in payment procedure, money management etc); and iii) prioritization for training courses to enhance skills and consideration for employment by contractors, where possible, and subject to contractors' operational needs.	Social	Project Duration. The quality of the support provided to individual PAPs throughout the resettlement process by BAM was emphasised by the PAPs themselves during the 2019 audit.

12.2	The Project will establish a Local Development Fund (LDF) and Community Development Agreements (Rural Communes) with funding criteria and priority to income generating activities and community development, including consideration for women's initiatives and vulnerable groups. It includes establishing a transparent mechanism regarding the management and implementation of the Local Development Fund. The LDF will include consideration for regional support for the Prefecture. This will feed into the preparation of a Community Development Plan as per the BAM/Alufer Convention. To manage the LDF, Alufer shall develop, in partnership with civil society and the local and traditional authorities, the criteria for the Local Development Fund, including support for health, road improvement, sanitation, urban and zonal plans, education and economic development. It includes communicating progress and the funds spent in a transparent manner with civil society and the communities.	E&S	Updated regulations released in 2019 and first two payments made in January (for 2018) and June 2020. Contributing mines have observer status on Technical Support Committee established to oversee the fund's management. Local Development Agreements with 3 communes impacted by the project endorsed by MMG.
12.3	When possible and if safe to do so, consider sharing project infrastructure with the communities.	Operations	Project Duration and post-closure
13	Cultural Heritage		
13.1	In consultation with the Elders and/or traditional authorities identify measures to protect the cultural sites near the project to minimize damage and/or desecration of the sites. All sites that are damaged by mistake will be managed through the incident management system, if the incident results in a grievance, it will be treated using the Grievance Mechanism Procedure.	Social	Completed Q4 2016, with additional signage and protection introduced in Q3 & Q4 2019
13.2	When potential cultural heritage sites cannot be avoided, establish compensation mitigation after consultation with the Elders and/or "families" responsible for maintaining the sites.	Social	Project Duration
13.3	The Chance Finds Procedure will be implemented throughout the construction period, including training of relevant staff and contractors in the recognition, handling and response to archaeological, or cultural heritage chance finds. Alternative access routes will be considered when necessary.	Social	Project Duration
14	Community Health, Safety and Security		
14.1	The project will develop in consultation with Khoundinde village a community development project to compensate for the Khoundinde quarry operations.	Social	Several projects delivered in 2018 and 2019. Youth center built in 2020 to close out commitment.
14.2	A Health Impact Assessment (HIA) will be conducted. This HIA will feed the preparation of a Community Health, Safety and Security Management Plan.	Social	Completed Q4 2016
14.3	The Project will develop a Community Health, Safety and Security Management Plan, which includes community safety awareness programs with the population and herders regarding traffic safety, pedestrian crossings, the planting of trees bordering the haul road to minimize dust, and construction of boom gates in key areas.	Social	Plan completed Q2 2017. First programs started Q1 2018, ongoing, especially with regards to : - safety along the haul road (with community campaigns alongside the awareness raising undertaken by security agents posted along the haul road. - HIV / Aids & malaria campaigns, the latest in December 2020, with the Chamber of Mines; - internships for local health center workers (suspended under covid)

14.4	Alufer will comply with the Voluntary Principles on Security and Human Rights (VPSHR).	CEO	Project Duration. VPSHR training rolled out for security services upon deployment and by security service providers
15	Security, Health, Environment and Communities Management System (SHEC-MS)		
15.1	The project will prepare an addendum to the ESIA and a Land Access and Resettlement Action Plan (LARP) for any other areas that the project may develop, should mine life be extended.	E&S	ESIA and LARP finalised in 2016 and still in use
16	Closure and Rehabilitation		
16.1	The project will prepare a Mine Reclamation and Closure Management Plan. This plan will be prepared in collaboration with key stakeholders during the construction phase. The Closure Plan will include: Stakeholder engagement process for closure, including external and internal stakeholders; Closure budget; Closure objectives, criteria and indicators developed in partnership with stakeholders; Framework for the establishment of a closure committee and closure process that will be headed by the Project Director; Retrenchment plan; Approach for reclamation of land; and Approach for stabilization, soil rehabilitation, reforestation, decommissioning of all infrastructure and aftercare and monitoring	E&S/Operations	Mine closure & rehabilitation framework was developed in 2016. Was due to be replaced by mine closure plan in 2020, now moved out to 2021.