

Public Commitment Register

Date: 17 November 2016

#	Commitment	Responsibility	Completion date
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	Q3 2017
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	Q3 2017
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	Construction phase
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	Q1 2017
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, NO _x and SO _x and noise in accordance with the Air Quality, Noise and Vibration Monitoring Plan.	Environment	Project Duration
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	Q1 2017
4	Soils and Land Cover		
4.1	The project will put in place erosion and sedimentation control measures during construction.	Environment and Operations	Construction phase
4.2	The project will prepare a Footprint Management Plan, including a procedure for Ground disturbance and clearing permit.	Environment	Q3 2016
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	Production phase
4.4	Top soil management will be implemented to ensure proper rehabilitation.	Operations	Construction phase
4.5	Aftercare will be maintained for a minimum period of 2-year post-closure.	E&S/Operations	Closure
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	Construction phase
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	Project Duration
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	Project Duration
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	Q3 2016
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
6.2	The project will examine if there are suitably licenced companies in Guinea that can recycle waste.	Environment	Q3 2017
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	Q3 2016
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	Q2 2016
7.3	The project will prepare marine, coastal and terrestrial habitat mapping prior to construction.	Environment	Q4 2016
7.4	The project will prepare a Biodiversity Management Plan 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 as per IFC PS6 and a Biodiversity Action Plan 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	Q1 2017
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	Q2 2017
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	Q2 2017
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	Construction phase
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 in compliance with IFC PS5 and Guinean requirements.	Social	Q4 2017
8.2	The Project will prepare Resettlement Principles which will be based on IFC PS5 and Guinean requirements.		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	Q3 2016
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
8.5	A grievance mechanism procedure will be prepared and will be available for the entire duration of the project.	Social	Q3 2016
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	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	Q1 2017
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) Q3 2017 ii) Q4 2016 iii) Q2 2016
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	Q4 2016
9.2	The Project will prepare a Retrenchment Plan for redundancies at the end of the construction and operations phases.	HR	Q4 2016
9.3	Preparation of an employment and training plan in compliance with the Government and IFC guidelines.	HR	Q4 2016
9.4	The project will prepare an Occupational Health and Safety Management Plan.	H&S	Q3 2016

9.5	The project will prepare a Transport and Traffic Management Plan.	H&S/E&S	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	Q3 2016
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	Q4 2016
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	Q1 2017
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	Project Duration
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	Project Duration
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	Q4 2016
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	Q4 2017
11	Land Use, Agriculture and Natural Resources		
11.1	Access to land adjacent to the Project-affected area will be facilitated where it is safe to do so.	Operations	Production phase
11.2	Project to minimize impacts on floodplains, extensively used by the communities for agriculture.	Operations	Q1 2016
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	Project Duration
12	Community Development		
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
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 Bel Air Mining/Alufer Mining 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	Q1 2018
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	Q4 2016
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	Construction phase
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	Q1 2017
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	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	Q4 2016
14.4	Alufer will comply with the Voluntary Principles on Security and Human Rights (VPSHR).	CEO	Project Duration
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	Project Duration
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	Q1 2018