NEWMONT GHANA GOLD LTD - AHAFO SOUTH PROJECT
EXTERNAL SOCIAL COMPLIANCE MONITORING
4th REVIEW – September 2006

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1 INTRODUCTION

1.1 GENERAL SCOPE OF THE EXTERNAL COMPLIANCE MONITORING

The Ahafo South Gold Mining Project (“the Project”) entails significant displacement and more broadly social impacts on the neighboring communities. The implementation of the Project by Newmont Ghana Gold Ltd (NGGL, “the Company”) has been on-going since April 2004. Compensation and resettlement activities have cleared for mining an area roughly 3,000 hectares in surface. Construction in this area of the mine and plant is complete, and both are currently in operation. First gold was produced in July 2006.

This is the fourth review; the previous three were undertaken in July 2005, December 2005 and May 2006. The reports of these reviews are publicly available at www.newmont.com.

These early reviews were undertaken based on Terms of Reference (ToRs) jointly prepared by Newmont and the International Finance Corporation (IFC), which initially (the first two reviews) focused solely on resettlement and compensation, and were then broadened to encompass social compliance in general, including, but not limited to, resettlement and compensation, as follows:
- Resettlement Action Plan implementation and performance,
- Community consultation presented in the Public Consultation and Disclosure Plan (PCDP),
- Community development,
- Grievance system management and effectiveness,
- IFC social policies and guidance,
- Social Action Plan (SAP from the ESIA).

The reviews are undertaken by Ms. Tasneem Salam, independent social development specialist, and Mr. Frederic Giovannetti, independent resettlement specialist.

1.2 FOCUS OF THIS REVIEW

This 4th review was undertaken by the two team members from August 31 to September 7, 2006. A close-out meeting was held with Newmont’s field team on September 6 and a debriefing took place at NGGL’s Accra office on September 7.

Since the last review, NGGL has started full-scale operation of the mine and plant and initial land acquisition and resettlement are virtually complete. As far as social aspects are concerned, NGGL has continued the implementation of two important social mitigation programs launched earlier in 2006:
- The Vulnerable People Program,
- The Agricultural Improvement and Land Access Program (AILAP).

The previous review in May 2006 had resulted in 29 recommendations. The September review has essentially focused on following up on the status of these recommendations, with a specific focus on the Vulnerable People Program and the AILAP.

The reviewers’ activities during their stay in Ghana included the following (see detailed activity log in Appendix 1):
- Visits to both resettlement sites of Kenyasi (Ola) and Ntotroso,
- Visit in the Mine Take Area and its vicinity, including around the Water Storage Facility in areas not part of the land take, and consultation with people in the villages of Dokyekrom and Yawusukrom, as well as with a few households to the Western end of the reservoir,
- Attendance at meetings of the Land Access Review Committee (LARC) in both Ntotroso and Kenyasi 2,
- Attendance at one meeting of the Vulnerable People Program Committee,
- Attendance at one meeting of the Vulnerable People Working Group,
10 interviews with affected households, including:
- Resettlers at both resettlement sites,
- Relocatees (households which qualified for and opted for cash compensation rather than resettlement),
- Interviews with two separate business women groups in Kenyasi 2,
- Numerous interviews with NGGL team members, including consultants from rePlan (formerly planning Alliance),
- Interviews with representatives of OICI; the NGO tasked, amongst others, with implementing the Livelihood Enhancement and Community Empowerment Program (LEEP), and with Guards of the Earth and Vulnerable, the NGO tasked with some components of the implementation of the Vulnerable People Program,
- A meeting with the District Chief Executive of Asutifi District,
- A “wrap-up” meeting with the NGGL team at site, and another with NGGL management in Accra.

NGGL provided logistics (accommodation) and facilitation (vehicle) to the reviewers. Meetings and interviews with stakeholders, including affected people, were held without NGGL representatives attending. An independent interpreter assisted the reviewers.

2 RESETTLEMENT AND COMPENSATION

2.1 SUMMARY STATUS OF RESETTLEMENT AND COMPENSATION

2.1.1 Key RAP Figures

Land acquisition required for the development of the Ahafo South Project entails the following impacts on people, land and fixed assets (Table 1 below, sources: Internal Monitoring Report, rePlan, August 2006):

Table 1: Summary of Project Impacts on People, Land and Structures

<table>
<thead>
<tr>
<th>PEOPLE</th>
<th>Households</th>
<th>Individuals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of affected people</td>
<td>1,701</td>
<td>9,575</td>
</tr>
<tr>
<td>Of which:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residents:</td>
<td>823</td>
<td>5,185</td>
</tr>
<tr>
<td>Of which:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>With primary residence in the mine take area</td>
<td>399</td>
<td>2,594</td>
</tr>
<tr>
<td>With primary residence elsewhere</td>
<td>424</td>
<td>2,586</td>
</tr>
<tr>
<td>Non-Residents:</td>
<td>878</td>
<td>4,390</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LAND</th>
<th>Crop Lands</th>
<th>Surface (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affected land</td>
<td>7,674 fields</td>
<td>4,717</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>STRUCTURES</th>
<th>Number of Buildings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affected structures</td>
<td>1,568</td>
</tr>
<tr>
<td>Of which complete structures</td>
<td>869</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>BUSINESSES</th>
<th>Number of Affected Businesses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affected businesses</td>
<td>43</td>
</tr>
</tbody>
</table>

These numbers have not changed since the previous review.
2.1.2 Summary Progress

The following table shows the present status of some critical progress indicators (Table 2, source: Internal Monitoring Report, Replan, August 2006):

Table 2: General Summary of Compensation and Resettlement Progress – 31 August 2006

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Objective</th>
<th>Done</th>
<th>Percentage of completion 31 August 2006</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of fields compensated</td>
<td>7,513</td>
<td>7,674</td>
<td>102.1%</td>
</tr>
<tr>
<td>Number of buildings compensated</td>
<td>1,568</td>
<td>1,568</td>
<td>100%</td>
</tr>
<tr>
<td>Number of resettlement houses complete</td>
<td>399</td>
<td>399</td>
<td>100%</td>
</tr>
<tr>
<td>- Ola</td>
<td>310</td>
<td>310</td>
<td></td>
</tr>
<tr>
<td>- Ntotroso</td>
<td>89</td>
<td>89</td>
<td></td>
</tr>
<tr>
<td>Number of households moved into their new resettlement house</td>
<td>399</td>
<td>395</td>
<td>99.0%</td>
</tr>
<tr>
<td>- Ola</td>
<td>310</td>
<td>308</td>
<td></td>
</tr>
<tr>
<td>- Ntotroso</td>
<td>89</td>
<td>87</td>
<td></td>
</tr>
</tbody>
</table>

As shown by Table 2, four households are yet to move to their resettlement houses (two in Ola, two in Ntotroso):
- Two households are experiencing inheritance problems following the death of the household head;
- Another two households have received their keys but have yet to move.

2.2 WATER SUPPLY AT RESETTLEMENT SITES

2.2.1 Observations

The previous review had highlighted several technical and managerial issues that hampered the normal operation of the two systems in Kenyasi 2 and Ntotroso, and had proposed a number of recommendations to improve the situation. Since the previous review, NGGL has taken the following actions:
- The system installed at the Kenyasi 2 Ola resettlement site is in the process of being strengthened by the installation of a new transformer;
- The monitoring of the management for both systems has been significantly improved:
  - Water meters have been installed;
  - NGGL carries out periodic readings of the different meters and collection of data related with revenue; this indicates that the performance is still poor; as little as 10% of the water produced by the systems is actually paid for by the consumers;
  - A specific monitoring report for the water systems has been produced and included in the quarterly internal monitoring report;
- Some refresher training on management has been organized by OICI for the Water and Sanitation Committees;
- Terms of Reference has been prepared to appoint a consulting firm to assist in the process of assessing and strengthening the management of the water systems.

2.2.2 Assessment and Way-Forward

Steps mentioned above are positive, but are yet to produce results. The next review will assess NGGL’s progress in implementing a corrective action plan to improve the performance and management of the two water systems. It is advised that any economic prediction related with the management of the water systems should be based on realistic consumption figures (probably between 10 and 20 l/day/capita).
**Recommendation:**

R4-1. Continue to implement recommendations of the previous review related with the management of the water systems at Ola and Ntotroso.

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### 2.3 REVIEW OF THE AGRICULTURAL IMPROVEMENT AND LAND ACCESS PROGRAM

#### 2.3.1 Observations

The report of the 3rd external review presents an overview of the objectives, principles and process of the Agricultural Improvement and Land Access Program (AILAP). Implementation had started in April 2006 and was still in “heat-up” mode at the time of the 3rd review, which generally recognized the soundness of the approach and offered a few recommendations to improve several aspects of the program implementation.

Phase I of the AILAP had prioritized resettlers and vulnerable people. According to NGGL, about 80 households are still pending registration under Phase I, and OICI is contacting them to ensure they do not miss out on the program’s opportunities.

Phase II is open to all affected people, and has started with registration in late July 2006. About 1,500 households were estimated to have registered as of end August 2006; in itself a significant success.

During the 3rd review, the reviewers had made recommendations to better focus the initial “business planning” training session intended for all applicants. The reviewers were pleased to observe that this initial training session now appears to be more participatory and better tailored to the needs of the average farmer, including subsistence farmers.

The reviewers also observed with satisfaction that messages related with the AILAP principles seem to be much better understood by the general community than previously.

Although their composition was not revisited, the LARC Committees were observed to have gained experience from their first months of operation and tend to hold better organized meetings. MOFA officials involved in the AILAP expressed satisfaction at the way the program is being coordinated by NGGL, although they also indicated that they would need more resources to carry the extension tasks assigned to MOFA under the AILAP.

PAPs eligible for the AILAP who would not be able to secure land by themselves can gain access to stool land for a period of two years, which would be made available to them in the framework of an agreement between NGGL and traditional authorities in both Kenyasi 2 and Ntotroso. The previous review had indicated that better clarity in the messages related with this particular provision was needed, and it appears that interested people now have a better understanding of the mechanism. However, face-to-face interviews with affected households in the resettlement sites as well as a discussion with the Kenyasi 2 LARC committee indicate that clarification is needed on when exactly the two-year period would start (when the agreement was signed or when the PAP actually starts cultivation). NGGL needs to make sure in this respect that the two-year period is an effective two-year of farming. 26 affected households have so far been deemed eligible by LARC Committees to benefit from this particular mechanism. The corresponding land was being cleared at the time of the review.

NGGL, with OICI’s support, has taken a positive step in endeavouring to organize local farmers to procure some of the inputs required for the assistance packages to be delivered to eligible PAPs as part of the AILAP. About 40 local groups have been formed to supply seedlings of various perennial crops. In addition, fertilizers and other chemical inputs are to be procured at national level through a tendering process. In-time procurement of all inputs is currently the main challenge of AILAP implementation. The reviewers attended a meeting of local farmers’ groups, where the latter expressed concern about NGGL’s procurement procedures, which they feel are too complicated for small, newly-established, groups. An arrangement whereby NGGL would contract a limited...
number of umbrella organizations rather than all 40 individual groups needs to be devised, as it is unlikely that all these small groups would be able to register as businesses and comply with rather stringent procurement requirements.

2.3.2 Recommended Way Forward

Recommendations:

R4-2. NGGL to clarify with traditional authorities that people eligible to allocation of stool land will be able to farm for two full years from the date of actual land allocation

R4-3. NGGL and OICI to review the farmers groups procurement strategy and consider contracting a small number of umbrella organizations rather than individual groups

2.4 Review of the Vulnerable People Program

2.4.1 Status of the Vulnerable People Program

A description of the program and key issues were set out in the previous review. In this 4th review it was observed that the Vulnerable People Program continues to function well. The working group and committee meet on a regular basis with detailed information on the cases and the reviewers observed the discussion on each case to be rigorous and balanced.

The Internal Monitoring Report, dated August 2006, carries useful information on the progress of the Vulnerable Program, a summary of which is shown in the table below. A total of 326 case reports have been made and 157 confirmed as vulnerable by the committee, of which the majority are in the resettlement sites.

Table 3: Summary Progress of the Vulnerable People Program – 31 August 2006

<table>
<thead>
<tr>
<th></th>
<th>Resettlement site</th>
<th>Non-resettlement site</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case reports</td>
<td>251</td>
<td>75</td>
<td>326</td>
</tr>
<tr>
<td>Advanced to working group</td>
<td>227</td>
<td>58</td>
<td>285</td>
</tr>
<tr>
<td>Selected as vulnerable and passed to vulnerable committee</td>
<td>116</td>
<td>41</td>
<td>157</td>
</tr>
<tr>
<td>Confirmed as vulnerable by committee</td>
<td>116</td>
<td>41</td>
<td>157</td>
</tr>
</tbody>
</table>

Source: NGGL Internal Monitoring Report, August 2006

2.4.2 Outstanding Issues

Progress and outstanding issues noted in this review are as follows:

- Progress has been made in going through the cases, but there are still outstanding cases which need to be reviewed by the working group and committee. Whilst the reviewers appreciate the careful and thorough way in which the cases are considered and that this is, of course, time consuming, there is a need to speed up the progress. Otherwise there is the danger that a number of vulnerable people that will be in a critical situation with delayed assistance. In dealing with vulnerability, speed of action is an important consideration.

- The monitoring team was informed that some households that had been identified as vulnerable, subsequently had this decision revoked after further analysis. This indicates that the Vulnerable People Program is flexible and responsive to new information and this is encouraging. The monitoring team did
not, however, have a chance to speak with the concerned families to understand how they had been informed about their change in status.

- Local knowledge is important in understanding and making decisions on support for the different cases, but it is important that the Program is able to demonstrate that no preference or unfair treatment has been given to any family as a result of association with people either in the working group or the committee.

- As mentioned in the previous review, the non-food assistance packages need further definition. The key non-food package of micro-credit and training is of course constrained by the lack of a proper micro-credit program. This is not something that the Vulnerable Program can do anything about as it is something that needs to be handled at a more strategic level by NGGL (see below). Another key component of the non-food package is counseling. This is considered by the working group and committee to be important for some families were vulnerability is caused or accentuated by social rather than economic or age issues. A sensible proposal has been put forward on the development of a proper counseling unit by the Brong Ahafo Regional Director of the Department of Social Welfare (recently retired) with assistance from other members of the vulnerable committee. It is something which could have a remit far wider than that of just the vulnerable people, for example, it could be useful also in conflict prevention. NGGL should give it serious consideration.

- A framework for monitoring vulnerable people receiving assistance has been developed. The implementation and results of this should be recorded in a systematic way. There are now various systems available which should allow this, particularly NEAMU.

- The monitoring team found that the vulnerable program had created a level of envy within the community, with many people wanting somehow to be evaluated as vulnerable. In an economy where there are many poor people, this is understandable, and NGGL should not be swayed by this, but should continue to explain to the community the objectives of the program and the nature of the target group.

- The Vulnerable People Committee when asked about any issues that they would like to be made known to the reviewers mentioned that more speedy decision making on matters put forward to NGGL management would be appreciated. Delays in decision obviously constrain successful implementation of the assistance measures.

- As an aside, a small point on Table 14 in the Internal Monitoring Report: This table is useful, but the column on results should not have statements like ‘successful’ without explaining why it is considered successful.

### 2.4.3 Recommended Way Forward

<table>
<thead>
<tr>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td>R4-4. NGGL to make sure that Vulnerable People Committee’s recommendations are made more operational. (This is carried forward from the previous review and relates mainly to the micro-credit programme)</td>
</tr>
<tr>
<td>R4-5. NGGL to make sure that any monitoring activities carried out by the Vulnerable Program are systematically recorded</td>
</tr>
</tbody>
</table>

### 2.5 Grievance Management

The third review in May 2006 had reiterated previously expressed concerns about grievance management. It is observed that a limited progress has been made in this respect since the last review. A management procedure has, however, been prepared, which represents a level of progress, but it remains to be implemented. The management of grievances is obviously constrained by a lack of resources, and it is important that a dedicated grievance officer be put in place in the near future. The management system will have to accommodate the need to inform aggrieved people of the status of their grievance.
While no significant progress was made with respect to the “general” grievance system, the reviewers have observed with interest that NGGL has developed an appropriate response to a particular type of grievance, those related with alleged cracked houses. NGGL is carrying out routine blasting as part of normal operations and the number of grievances related with cracks in structures has dramatically increased in the last months, with about 130 such complaints recorded by NGGL as of late August 2006. Blasting monitoring carried out internally by NGGL indicates that international vibration standards are not exceeded.

Experience from other projects indicates that such complaints indeed have potential to escalate, and NGGL is rightly attempting to address these grievances before they do so. The specific procedure, which allows complainants to be represented by committees, is overall sound. NGGL plans to involve independent external parties, including the Mines Department of the Government of Ghana, in the review of its blasting procedures and vibration monitoring results.

**Recommendation:**

R4-6. NGGL to demonstrate significant progress on grievance management by next external review

### 2.6 LIVELIHOOD ENHANCEMENT AND COMMUNITY EMPOWERMENT PROGRAM (LEEP)

#### 2.6.1 Situation and Assessment at 4th Review

The LEEP Program implemented through OICI is fortunate enough to have a very extensive, well skilled and enthusiastic team at its disposal. During consultation in the field it was observed by the reviewers that OICI is well known and appreciated by project affected people. What was not clear is whether they understood that OICI are implementing projects for NGGL. It is important that this is made clear to the communities.

A LEEP II program is currently being developed for which a draft framework is in place but needs further development. LEEP II is intended to expand the program beyond resettled people to the broader impacted communities which is a positive move. The Internal Monitoring Report, August 2006 mentions that the completion of LEEP II will require a needs assessment of stakeholders and this is indeed very important. More than ever before, during this review, the communities voiced in no uncertain terms their desire for income generating opportunities. The lack of opportunities to increase their livelihoods was the main concern of all consulted. Thus the needs assessment has to be matched by an understanding of what opportunities can be exploited/ developed in the local area to improve livelihoods. At present the framework for LEEP II suffers from the same problems as that of LEEP I in that although there is a logframe with objectives, activities and indicators there is no reasoned thinking of how these objectives and activities were derived. Thus the recommendations made in the 3rd monitoring report are still relevant.

#### 2.6.2 Micro-credit

The need to create a suitable micro-credit program has been raised by the monitoring team since August 2005. NGGL and OICI have been exploring different micro-credit approaches, to identify one that would both meet the needs of the potential client group and be sustainable. During this review it was mentioned that OICI no longer thought it would be suitable to have their own micro-credit program, but were looking at the possibility of working through local banks. This is not a bad idea as it does develop local capacity. What is important is that some kind of action should be taken to develop an appropriate program because at this stage the failure to do so has started to have a counter-productive effect on the way people view the various livelihood programs. Some activities such as skills training are non-effective without some way of utilizing that skill to create income-earning opportunities and this is where the availability of micro-credit is so important. Nevertheless the monitoring team appreciates that sustainability of a micro-credit program is very important and is dependent on careful design and implementation. One possible approach would be to develop a small pilot scheme that could be tested on one of the women’s groups. A Ghanaian micro-credit expert should be taken on immediately to develop such a scheme. Given the proximity of OICI to the various livelihood initiatives, it is probably best if that person is someone that
is not associated with OICI. The reviewers have been informed that NGGL are in discussion with a Ghana-based NGO and hope to review progress in the following monitoring review.

2.6.3 Recommended Way Forward

<table>
<thead>
<tr>
<th>Recommendation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>R4-7. (Carried over from previous review) NGGL and OICI to review original LEEP objectives, verify current program needs and stream-line and focus, building on achievements to date. Specifically the reviewers recommend that the following steps be taken:</td>
</tr>
<tr>
<td>a) a mid-term external evaluation;</td>
</tr>
<tr>
<td>b) development of a strategic framework;</td>
</tr>
<tr>
<td>c) action plan for implementation which takes account of inter-connection between the different activities</td>
</tr>
<tr>
<td>R4-8. Recruit a Ghanaian micro-credit expert to develop a pilot micro-credit scheme to be tested on a suitable group before implementing on a wider scale</td>
</tr>
</tbody>
</table>

2.7 LAND TITLES

Resettlers at both Ola and Ntotroso resettlement sites are to receive land titles sanctioning the ownership of the plot of land they were allocated. Legally, resettlers will be long-term lessees of the State of Ghana. Although land leases were not issued at the time of the review, the land lease processing, a somewhat lengthy procedure that involves several steps of review at the Lands Commission, has progressed since the last review, thanks to facilitation by NGGL:

- All land lease applications (414 in total) are now introduced;
- All land lease applications have received the two-stage approval required by the Lands Commission process;
- The final steps include the hand-over of “Offer Letters”, which the applicant lessee needs to accept in the form of an “Acceptance Letter”, and the final preparation of an “Indenture”, which is in effect the land lease document.

The whole process now appears to be well under control, and it is expected that it should be complete soon. NGGL and rePlan will have to facilitate the last stages mentioned above.
3 BROADER COMMUNITY ISSUES

3.1 COMMUNITY CONSULTATION AND ENGAGEMENT

3.1.1 Public Perception of Project and Company

The reviewers were concerned to notice during their consultations that there is a marked deterioration in public perception of the Project and Company, in spite of the various programs that are being implemented. This could be due to a number of factors including:

- Compensation money given to affected people has been spent and where it has not been spent wisely (and perhaps even where it has been) there is a tendency of feeling worried and “worse off”.
- As Construction Phase ends, employment contracts are also coming to an end and even if people were hired with the knowledge that the employment is contractual and not permanent, there is a feeling of disappointment and a need to face up to the harsh reality of lack of employment opportunities. This is to be expected.
- There may have been some outside activity in the area which may have sent out negative messages regarding NGGL and the mine operations. The reviewers do not have any hard evidence of this, but felt that the complaints from the different people consulted had a level of rhetoric and consistency which indicated some outside influence.
- There is also a feeling that somehow Newmont should fix all the problems of the community whether it is a problem created by the Company or not. This pattern of expectations is often observed in areas where there is a lack of an effective government structure to address people’s problem and an outside organization enters and engages with the community.

3.1.2 Recommended Way Forward

A number of measures can be taken to address this situation of negative perception.

Review Methodologies of Public Engagement

The reviewers are overall of the view that public engagement on the project has been to a high standard, but there are areas in which some adjustments could be made:

- The current approach has perhaps placed too much of an emphasis on Chiefs and Committees and whilst these avenues are important, there is a tendency for the structures to be rather unwieldy and hierarchical, with the danger that messages can get lost and misinterpreted.
- NGGL should consider instead an approach of more direct communication with smaller groups of people. Whilst more time consuming the benefits are that a better understanding can be created between NGGL and the people.
- A greater involvement of the District Assembly (DA) should be encouraged. At present the DA is part of the debate on social responsibility but has very little information on, for example, how the Vulnerable People Program is organized.
- There may be merit in involving higher levels of Government for example the Regional Ministry / Government level, perhaps making people more aware of how the NGGL operations in Ghana fit into overall government economic policy. This would give people the context that NGGL is not so much an outside entity, but more part of Ghana’s development strategy.

Inform Young People about Project

This is a long term project in which the communities and NGGL will need to live harmoniously together and this requires understanding on both sides. The young people of today will be adults during the lifetime of the Project and therefore it is important that they grow up with an understanding of the Project not only from the perspective of the operations of the mine, but also its economic role in relation to government policy. Students at primary school and JSS should be targeted and specific educational projects created to enable information dissemination and a greater understanding of the different aspects of NGGL’s operations in Ghana.
Communication of Results of Environmental and Health Monitoring

The community has raised various issues on environment and health impact of the Project. There is a need not only to provide information, but also to ensure that the information is accessible, understood and trusted as being correct by the people. One of the problems is that information related to environment and health is often technical in nature and not always easily understood by the lay person. To overcome this, one approach could be to train a group of locally respected people who are already in technical professions, such as medicine and engineering, in how to understand and interpret environment and health monitoring information. These people would then in turn convey this information to the communities. This is a suggested approach – it should be tested with the communities themselves to see whether it would be acceptable to them.

Improve Transparency on Project Activities

The communities should be kept aware of the different activities that are taking place in the Project whether they are directly affected by them or not. It is part of creating good neighborliness and understanding. Mechanisms for increasing transparency would include, for example, feedback to the community on the resettlement and social monitoring review.

Information on Royalty Distribution

Building on the idea of increased transparency the Project should consider disseminating information on the Royalty Distribution. This should be carried out for a number of reasons:

- It would enable people’s right to information about a major project in their area.
- It would enable people to better understand the impact of NGGL on the economy and why it is part of a government development strategy.
- With better understanding of the financial contribution of NGGL to their economy, people would be able to have a greater influence on how this money is spent by the government of Ghana for the good of the people. As a functioning democracy, Ghana is well placed to do so.

Newsletter

A useful means of communication that is often used in long term projects is a user-friendly newsletter that could be produced by the communications team of NGGL. This would provide official information about the Project and its activities. It could be made interactive with contributions from employees and local people.

3.1.3 Recommended Way Forward

Recommendation:

R4-9. NGGL to review and revise the current public consultation and disclosure plan into an on-going program to be implemented during Operations. A part of this would be to formulate a stakeholder engagement action plan which identifies and categorises all the different types of stakeholders, e.g. resettlers, NGOs, Kenyase residents etc. and the different consultation exercises that will be carried out with each stakeholder group over time, the purpose of the exercise and tools used. This action plan can be written in tabular form. (carried over from last review)

R4-10. Review methodologies for public engagement and look at widening scope by including measures such as emphasis on youth, greater transparency including information on royalty distribution. In addition consider the use of locally regarded experts and a newsletter
3.2 NON-PAP PROJECT IMPACTED PEOPLE

3.2.1 Socio-economic Information

Following the recommendations made in the last review regarding the need for more basic socio-economic data on the non-PAP impacted people, these areas are to be included in the baseline studies that are now being carried out for South Phase Lease Area. This data needs to be analyzed separately and made available to NGGL External Affairs Department so that interaction with these communities is based on sound information and the effect of any activities can be measured more accurately.

3.2.2 Bus Service

The bus service provided by NGGL now also operates during the weekend and is a useful service for the community around the Water Storage Facility (WSF). The reviewers were able to observe in a site visit on a Sunday that the bus was providing a regular service and being well used by the communities. Information on journeys and passengers is now also collected.

3.3 GENDER MAINSTREAMING

3.3.1 Progress since 3rd Review

Significant progress has been made since the last review. The Gender Liaison Officer has worked effectively to mobilize women’s groups in various affected communities. During the time of this review a Women’s Consultative Committee was in the final stages of being established with representatives from the resettlement sites, women’s groups from other parts of the surrounding community and local government and traditional leader representation. An inauguration of the committee is due to take place in October 2006.

A draft gender strategy has been developed with an activity plan outlining stakeholder consultation. The draft strategy is comprehensive and provides a good basis for mainstreaming gender in the work of NGGL in the community.

The review team met with two women’s group in Kenyasi – the Hairdressers Association and the Women’s Business Association. Both groups had a significant membership of women already in business and their main concern was how to improve their business to generate more income for their families. They all expressed their frustration at the lack of funds and were in anticipation of a micro credit facility. Two points are of significance here:

- As noted before, women in Ghana play a very active role in the economy. It would be prudent to give special attention to supporting that role through the various activities being carried out at present such as LEEP.
- Whilst micro-credit can play an important role in improving small scale businesses, it should be emphasized to the women that this will be a loan and not a grant.

3.4 COMMUNITY SAFETY AND HEALTH

3.4.1 Traffic

Significant improvements have been made with regard to traffic safety. There are now more than an adequate number of warning signals for traffic passing the school at Ntotroso. NGGL vehicles are considered to keep to speed limits, but the Project is obviously more limited in its ability to enforce speed limits on non-Project vehicles.
3.4.2 Blasting

The recent blasting at the mine site were considered not to require notifications to communities around the WSF, but some of the people in the village of Dokyikrom complained to the reviewers about the lack of notification and that the blast could be felt in their village. NGGL should review the area where notification is required.

There have been a number of complaints made to NGGL regarding the impact of blasting on housing structures, including in Dokyikrom. Management of these complaints is discussed in more detail in the section on grievances above.

Recommendation:

R4-11. NGGL to review the catchment area for blasting notifications.

3.4.3 Mosquitoes and Mine Related Diseases

According to information in NGGL’s Response to Third RAP Implementation Review, a total of 361 insecticide treated mosquito nets were sold at the subsidized price of Cedis 10,000 per net. Indeed during interviews around the WSF, a number of the families said that they now had mosquito nets. In an interview with one group of people there were allegations made that some people from Kenyasi who were not entitled to purchase the nets at the subsidised price had done so. The reviewers did not have the opportunity to check if this was indeed the case, but would suggest to NGGL that if information on which families purchased mosquito nets is available it should be checked to see that people who purchased the nets are indeed those who are eligible.

People continue to voice concerns about dangerous animals being a threat due to the WSF, in particular crocodiles and snakes. Less was heard this time about mining–related diseases. The recommendation from the previous review in this respect remains pending.

Recommendation:

R4-12. *(Carried over from previous review)* NGGL to develop effective public information and dissemination with regard to mine-related health and disease. This information awareness campaign should be carried out in association with an independent Ghanaian expert

3.5 Employment and Procurement

3.5.1 Employment

Construction workers have for a large part been retrenched in the second quarter of 2006. This process appears to have gone smoothly. NGGL provided support to retrenched workers in the form of “worker forums”, which assisted them in assessing their own newly-acquired skills in the perspective of future employment.

Another important step recently taken by NGGL is that workers have been revalidated for “local” status by local authorities, including local elected District Assemblypersons and traditional chiefs. This again appears to have been well managed.

During the next review, the reviewers will engage more actively with both active and retrenched workers to gain a better understanding of the processes and approaches used by NGGL in respect of employment and retrenchment.

3.5.2 Procurement

In addition to procuring goods and services from Ghanaian companies, NGGL, with support from OICI, is attempting to enhance “very local” procurement as mentioned in section 2.3 about the AILAP. It is a common observation on similar projects that local micro-businesses, even when they are formal, usually find it difficult to
meet the procurement requirements of an organization such as Newmont. It is recommended that NGGL’s
external affairs officers work with procurement officers to check how some of these requirements could be
tailored to the possibilities of local micro-businesses.

**Recommendation:**

R4-13. NGGL’s External Affairs Department to work with Procurement to review procurement
requirements for local small businesses

### 3.6 Community Development Plan

A Community Development Plan is being formulated which would bring together the different initiatives that are
currently being implemented by NGGL, both as a part of mitigation and development activities for mine affected
communities and also activities that would be part of NGGL Social Responsibility Initiatives. Given that in total
there are around 50 different activities being implemented there is certainly a need for a plan which would provide
a framework so that the different activities are coordinated and complementary. The precise nature of the
development plan has yet to be clarified; thus, whilst the reviewers agree in principle that it would be a good idea,
进一步 comments will be made when there is something more concrete that can be assessed.

### 3.7 Other Social Risks – Conflict Prevention

It is very encouraging to see that NGGL has appreciated the need to develop a strategy of early warning and
preventive action on conflict, which was recommended in the 3rd external review. The task of taking this forward
has been encompassed within the communications team of the NGGL External Affairs department. An action
plan has been prepared with activities identified such as establishment of a conflict resolution committee and the
development of a strategy to prevent conflict from arising including early warning signals. All of these actions
have, however, been delayed by the lack of implementation of a key component in the action plan which is to
appoint a conflict resolution officer. Terms of Reference for the conflict officer has been developed and at the
time of this review was still awaiting decision from management. Thus whilst conflict prevention is very much on
the agenda, it is still to be implemented and therefore the recommendation made in the previous review is retained
as pending into this review.

A conflict advisor position needs to be in place and strategy developed. One aspect that the strategy should
include is training of staff who are responsible for security. It is understood that the security staff currently
undergo training on managing difficult situations, but it would be useful for that training to be reviewed in the
context of a conflict prevention strategy.

Two conflict situations have occurred since the last review. One related to employment in which a number of
youths blocked the road from Sunyani to Ntotroso during a ceremony, because they felt that a chief had
influenced the employment disengagement process. This was despite the information given in a discussion held
with a Youth Executive Group. It was felt by the communications team at NGGL that a key lesson learnt is that
more direct meetings with smaller groups is required and the Project cannot be sure that information given to a
select group will be passed on to the rest of the community in the desired way. The other conflict was a resolution
presented to NGGL Management by the local chiefs due to an alleged derogatory remark made by a senior
NGGL staff. Both situations seemed to have been handled adequately, but does illustrate the range of situations
which could lead to conflict in the life time of the Project. Thus early implementation of the conflict prevention
strategy is required.
Recommendation:

R4-14. (Carried over from previous review) NGGL to develop a strategy of early warning and preventative action. This could incorporate:

- Training of external affairs department staff in direct contact with the community on recognition of signs of conflict situations.
- Creation of a specific position within the External Affairs Department that would be responsible for reviewing and advising on the conflict status of the local community. It could also review design and implementation of programs to ensure that there are no aspects that could lead to a conflicting situation.

4 MONITORING & EVALUATION

4.1 ORGANIZATION AND RESOURCES

NEAMU, the dedicated monitoring unit of NGGL’s External Affairs Department, is now well established, with 7 full-time and 3 part-time staff, and other resources available. NEAMU has updated the list of indicators that will be monitored, in accordance with previous recommendations of the external reviewers to simplify the overall monitoring mechanism.

The Internal Monitoring Report produced by rePlan is of good quality, with all necessary information easily accessible. With NEAMU now well established and the report format well in place, NGGL should consider transferring the responsibility of producing this report to NEAMU.

Progress on the upgrade of the database is still expected.

Recommendation:

R4-15. NEAMU to progressively take over responsibility for production of the internal monitoring report

4.2 SOCIO-ECONOMIC MONITORING SURVEYS

OICI has produced a report on the first campaign of household surveys carried out in March and April 2006. 392 households (including resettlers, relocates, and non residents) have been administered a detailed questionnaire (32 pages). The report presents the methodology and results of the quantitative survey, with an executive summary. It is comprehensive and clearly written, and provides a lot of valuable “baseline” information, statistically sound, appropriately processed, and usually disaggregated\(^1\) where relevant.

In the reviewers’ view, however, it remains to be seen how in practice such information can be used to support strategic planning and decision-making. It is the reviewers’ opinion that NGGL’s monitoring survey strategy still needs some rethinking, with a clarification of objectives, possibly along the following indicative lines:

- **Objective 1: Monitoring of livelihood restoration:**
  - This will involve quantitative surveys of the type carried out in March 2006 by OICI; as mentioned in previous reviews, usual practice is to replicate such surveys once or twice over the whole Project cycle (one “baseline” survey, one in the course of implementation, and one when livelihoods are stabilized, for instance two to three years after resettlement is complete);

\(^1\) Some more disaggregation by gender and compensation type or location could have been desirable.
This analysis could usefully include a control group of people not affected by the Project in an area comparable to the Project area for all other aspects but Project impacts;

This analysis could also result in the calculation of a global “socio-economic index”, which provides a very useful and simple tool to compare situations, for different points in time (baseline vs. post Project situation, different locations (control group vs. PAPs), different groups within the general PAP group (relocatees vs. resettlers, women vs. men, etc…); such an analysis has been developed to monitor the socio-economic impacts of the Chad-Cameroon oil pipeline².

Objective 2: Provide information for short and mid term strategic planning: This would mainly involve qualitative information, gathered through the following instruments:

- a limited number of face-to-face interviews with affected households (possibly on the model used by these reviewers),
- key informant interviews (administration officials, elected representatives, traditional chiefs, Union leaders, CBO leaders, NGOs),
- a limited number of group meetings (“Focus Groups” or similar methodology),

Objective 3: Monitor the community for potential difficulties, conflicts and hardship: NGGL’s community engagement strategy provides numerous tools that allow the company to stay alert of any problem in its relationship with the community, particularly the periodic meetings with different stakeholders on a whole range of subjects through the different committees established to address a specific topic; the point here could be that information derived from these meetings is not systematically collated or used, and possibly NEAMU could participate in these meetings to systematically record information that appears relevant to monitoring.

Recommendations:

R4-16. NGGL to clarify household monitoring objectives and to revisit its household survey strategy accordingly, based on a feasible frequency (6-monthly as a maximum, possibly less) and reasonable sample of quantitative interviews in combination with more qualitative instruments, and to consider the use of a socio-economic index to process and present quantitative surveys

R4-17. NGGL to consider NEAMU’s participation in Committee meetings and other engagement opportunities with different stakeholders, to enable NEAMU to gather qualitative monitoring information systematically

² See “Cogels, Serge & Koppert, George, Socioeconomic Monitoring Survey in the Chad Oil Field Development Area and Pipeline Corridor”, GEPFE and Université Libre de Bruxelles, 2003. This study is publicly available in English at http://www.ulb.ac.be/socio/anthropo/chad
5 FOLLOW-UP ON PREVIOUS RECOMMENDATIONS

The following table (Table 4) presents the progress on recommendations made in the previous reviews and which the previous review (May 2006) concluded were still pending:

Table 4: Summary of Recommendations Made in the Previous Reviews

<table>
<thead>
<tr>
<th>Review</th>
<th>#</th>
<th>Issue</th>
<th>Recommendations</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 06</td>
<td>R3-1</td>
<td>Water at resettlement sites</td>
<td>NGGL with Community, Water Board and Committees, CWSA and possibly consultant, to implement and document the way forward detailed above, including review of technical problems, enhancement of management capacity, monitoring and users awareness.</td>
<td>Pending ToR prepared but consultant to be selected and recruited</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-2</td>
<td>Land Access</td>
<td>NGGL to clarify messages related with the occupation of Royal Lands, particularly in respect of the two years duration, as well as the linkage between the AILAP and the Vulnerable People Program related with this safety net.</td>
<td>Pending Need to clarify when the 2-year period starts</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-3</td>
<td>Land Access</td>
<td>NGGL to make sure that suppliers are available and prepared to deliver in time the large quantities of agricultural inputs that are required.</td>
<td>Pending Farmers groups to be organized. Procurement procedures to be simplified for farmers groups</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-4</td>
<td>Land Access</td>
<td>NGGL to attempt to categorize applicants into the AILAP, for instance between potential business farmers and subsistence farmers.</td>
<td>Closed Applicants categorized and training better tailored to needs</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-5</td>
<td>Land Access</td>
<td>NGGL to review the results of the current Business Plan training session and to make it more effective, for instance by replacing it by a more practical and slightly longer session (half-day or full day) aiming at supporting applicants in the choice of their farming model and crops, with a discussion of the merits of each of the 11 proposed packages.</td>
<td>Closed Business plan training better tailored to needs</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-6</td>
<td>Land Access</td>
<td>NGGL to ensure that complete information is given to applicants when they register into the AILAP and that the same messages are reinforced all along the further steps of the process, and that all staff and other stakeholders participating in this process deliver the same messages.</td>
<td>Closed People enrolled in the program observed to be well-informed</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-7</td>
<td>Land Access</td>
<td>NGGL to ensure that survey task force gets landowners and sharecroppers to sign their agreement when the plot is surveyed, to simplify and expedite the process, and to confirm the absence of official registration requirements.</td>
<td>Closed Recommendation implemented</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-8</td>
<td>Land Access</td>
<td>NGGL to make the LARC Committees more compact and more effective, through a better preparation of their proceedings, the provision of translation services, and a clarification of their mandate.</td>
<td>Closed LARC Committees observed to be more effective</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-9</td>
<td>Vulnerable People</td>
<td>NGGL to make sure Vulnerable People Committee’s recommendations are made more operational.</td>
<td>Closed Superseded by recommendation R4-4 of current review</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-10</td>
<td>Vulnerable People</td>
<td>NGGL to make sure that counselling activities are defined in greater detail.</td>
<td>Pending Counseling activities yet to be defined in detail</td>
</tr>
<tr>
<td>Review</td>
<td>#</td>
<td>Issue</td>
<td>Recommendations</td>
<td>Status</td>
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<tr>
<td>May 06</td>
<td>R3-11</td>
<td>Vulnerable People</td>
<td>NGGL to define a follow-up mechanism to monitor the implementation of recommendations of the Vulnerable People Committee</td>
<td>Closed</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-12</td>
<td>Vulnerable People</td>
<td>NGGL to continue to make sure that the most vulnerable are indeed captured in the program</td>
<td>Closed</td>
</tr>
<tr>
<td>May 06</td>
<td>R3-13</td>
<td>Grievances</td>
<td>NGGL to integrate grievance management requirements into the scope of work for provision of GIS and database-related services.</td>
<td>Pending</td>
</tr>
</tbody>
</table>
| May 06  | R3-14 | LEEP Program                       | NGGL and OICI to review LEEP, original program objectives, verify current program needs and stream-line and focus, building on achievements to date. Specifically the reviewers recommend that the following steps be taken:  
- a mid-term external evaluation;  
- development of a strategic framework  
- action plan for implementation which takes account of inter-connection between the different activities. | Closed                                  |
| May 06  | R3-15 | Land Titles                         | NGGL to facilitate an exceptional meeting of the Sunyani Board of the Lands Commission dedicated to the review of NGGL-related applications for land leases.                                                   | Closed                                  |
| May 06  | R3-16 | Land Titles                         | NGGL to facilitate computerization of the production of the indentures by the Sunyani Branch of the Lands Commission.                                                                                           | Pending                                 |
| May 06  | R3-17 | Land Titles                         | NGGL to communicate on the annual rent that resettlers will have to pay to the Office of the Administrator of Stool Lands once the leases are issued.                                                            | Pending                                 |
| May 06  | R3-18 | Public Consultation                | NGGL to review and revise the current public consultation and disclosure plan into an on-going program to be implemented during Operations. A part of this would be to formulate a stakeholder engagement action plan which identifies and categorises all the different types of stakeholders, e.g., resettlers, NGOs, Kenyase residents, etc. and the different consultation exercises that will be carried out with each stakeholder group over time, the purpose of the exercise and tools used. This action plan can be written in tabular form. | Closed                                  |
| May 06  | R3-19 | Non PAP Project-Impacted People    | NGGL to develop a strategy for identification, documentation and mitigation of impacts for all non-PAP impacted communities. This plan should:  
- group people by geographical area, identify impacts and severity, develop mitigation measures and a timescale for implementation of these measures.  
- Present baseline socio-economic in an accessible form.  
- Where baseline socio-economic information has not been collected, the Project should consider the minimum information required and how it can be made available. | Pending                                 |
<p>| May 06  | R3-20 | Non PAP Project-Impacted People    | Where mitigation measures are already in place such as the busing arrangement, NGGL to establish key indicators and collect information such as the number of journeys made, route taken, number of school children transported, number of non-school children transported and purpose of visit if available. This information should be collected by weekdays and be disaggregated by gender | Pending                                 |</p>
<table>
<thead>
<tr>
<th>Review</th>
<th>#</th>
<th>Issue</th>
<th>Recommendations</th>
<th>Status</th>
</tr>
</thead>
</table>
| May 06 | R3-21 | Gender                | NGGL to develop a systematic approach to mainstreaming gender considerations in the development of all programs related to the Project. Specific questions that will be asked in such an approach are:  
- Does the program provide for institutional arrangements for consulting with women whose lives will be affected?  
- How will women be involved as active participants in project implementation?  
- Are barriers to participation by women identified and addressed?  
- Etc. | Closed  
Plan in place and being implemented |
| May 06 | R3-22 | Community Safety      | NGGL to make improvements to traffic management through the following measures:  
- Enforcement of speed limits  
- Advance warning signals for school at Ntrotroso resettlement site | Closed  
Done |
| May 06 | R3-23 | Community Safety      | NGGL to hold discussions with VRA to clarify maintenance cost and procedure for community lighting. Depending on the outcome of this discussion, short and medium term measures should be developed to ensure availability of street-lighting in the resettlement sites. | Closed  
Done |
| May 06 | R3-24 | Community Safety      | NGGL to develop effective public information and dissemination with regard to mine-related health and disease. This information awareness campaign should be carried out in association with an independent Ghanaian expert. | Pending  
Experts being identified and recruited |
| May 06 | R3-25 | Local Procurement     | NGGL to develop supply side support for local people and businesses so that they can effectively take up procurement opportunities. Different approaches to applying this support should be explored including implementation through an enhanced LEEP. SME support has also been promised by the International Finance Corporation. Specific activities that should inform a supply side intervention program include:  
- an inventory of the relevant businesses and individual enterprises that are available in the local area;  
- their level of development and skills base;  
- organizational capacity to set up co-operatives. | Pending  
AILAP procurement plan being prepared and implemented  
SME report expected from IFC |
| May 06 | R3-26 | Employment            | NGGL to check that all contractors apply sound employment and disengagement practices. | Closed  
NGGL does check and monitor |
| May 06 | R3-27 | Conflict Prevention   | NGGL to develop a strategy of early warning and preventative action. This could incorporate:  
- Training of external affairs department staff in direct contact with the community on recognition of signs of conflict situations.  
- Creation of a specific position within the External Affairs Department that would be responsible for reviewing and advising on the conflict status of the local community. It could also review design and implementation of programs to ensure that there are no aspects that could lead to a conflicting situation. | Closed  
Superseded by recommendation R4-14 of current review |
| May 06 | R3-28 | Monitoring & Evaluation | NGGL to focus NEAMU on indicators committed upon in publicly disclosed documents, at least during a warming-up period. | Closed  
Done |
| May 06 | R3-29 | Monitoring & Evaluation | NGGL to revisit its household survey strategy, based on a feasible frequency and sample of quantitative interviews in combination with more qualitative instruments | Closed  
Superseded by recommendation R4-16 of current review |
6 SUMMARY OF NEW RECOMMENDATIONS

6.1 OVERVIEW

Recommendations are prioritized as follows:

**High:** Actions that are critical to ensure compliance with commitments contained in the RAP, SAP or World Bank Group policies

**Medium:** Actions desirable to comply with social or resettlement good practice or to address actual or potential areas of social risk

**Low:** Important actions that may be less time critical

6.2 SUMMARY OF NEW RECOMMENDATIONS

See table 5 below.
### Table 5: Summary of New Recommendations

<table>
<thead>
<tr>
<th>Review</th>
<th>#</th>
<th>Issue</th>
<th>Recommendation</th>
<th>Priority</th>
<th>Time frame for start of implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-1</td>
<td>Water supply at resettlement sites</td>
<td>Continue to implement recommendations of the previous review related with the management of the water systems at Ola and Ntotroso.</td>
<td>High</td>
<td>Immediate</td>
</tr>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-2</td>
<td>AILAP</td>
<td>NGGL to clarify with traditional authorities that people eligible to allocation of stool land will be able to farm for two full years from the date of actual land allocation</td>
<td>High</td>
<td>Immediate</td>
</tr>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-3</td>
<td>AILAP</td>
<td>NGGL and OICI to review the farmers groups procurement strategy and consider contracting a small number of umbrella organizations rather than individual groups</td>
<td>Medium</td>
<td>Immediate</td>
</tr>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-4</td>
<td>Assistance to Vulnerable People</td>
<td>NGGL to make sure that Vulnerable People Committee’s recommendations are made more operational (This is carried forward from the previous review and relates mainly to the micro-credit programme)</td>
<td>High</td>
<td>Immediate</td>
</tr>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-5</td>
<td>Assistance to Vulnerable People</td>
<td>NGGL to make sure that any monitoring activities carried out by the Vulnerable Program are systematically recorded.</td>
<td>Medium</td>
<td>Immediate</td>
</tr>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-6</td>
<td>Grievance Management</td>
<td>NGGL to demonstrate significant progress on grievance management by next external review</td>
<td>High</td>
<td>Immediate</td>
</tr>
</tbody>
</table>
| 4 (Sept. 06) | R4-7 | LEEP                                       | NGGL and OICI to review original LEEP objectives, verify current program needs and stream-line and focus, building on achievements to date. Specifically the reviewers recommend that the following steps be taken:  
- a mid-term external evaluation;  
- development of a strategic framework;  
- action plan for implementation which takes account of inter-connection between the different activities. | High     | Q4, 2006 – Q1, 2007                    |
<p>| 4 (Sept. 06) | R4-8 | LEEP                                       | Recruit a Ghanaian micro-credit expert to develop a pilot micro-credit scheme to be tested on a suitable group before implementing on a wider scale | High     | Immediate                              |
| 4 (Sept. 06) | R4-9 | Community Consultation and Engagement      | NGGL to review and revise the current public consultation and disclosure plan into an on-going program to be implemented during Operations. A part of this would be to formulate a stakeholder engagement action plan which identifies and categorises all the different types of stakeholders, e.g. resettlers, NGOs, Kenyase residents etc. and the different consultation exercises that will be carried out with each stakeholder group over time, the purpose of the exercise and tools used. This action plan can be written in tabular form. (carried over from last review) | High     | Q4, 2006 – Q1, 2007                    |</p>
<table>
<thead>
<tr>
<th>Review</th>
<th>#</th>
<th>Issue</th>
<th>Recommendation</th>
<th>Priority</th>
<th>Time frame for start of implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-10</td>
<td>Community Consultation and Engagement</td>
<td>Review methodologies for public engagement and look at widening scope by including measures such as emphasis on youth, greater transparency including information on royalty distribution. In addition consider the use of locally regarded experts and a newsletter</td>
<td>Medium</td>
<td>2007</td>
</tr>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-11</td>
<td>Community Consultation and Engagement</td>
<td>NGGL to review the catchment area for blasting notifications.</td>
<td>Medium</td>
<td>Immediate</td>
</tr>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-12</td>
<td>Community Consultation and Engagement</td>
<td>NGGL to develop effective public information and dissemination with regard to mine-related health and disease. This information awareness campaign should be carried out in association with an independent Ghanaian expert</td>
<td>High</td>
<td>2007</td>
</tr>
<tr>
<td>4 (Sept. 06)</td>
<td>R4-13</td>
<td>Very Local Procurement</td>
<td>NGGL’s External Affairs Department to work with Procurement to review procurement requirements for local small businesses</td>
<td>Medium</td>
<td>2007</td>
</tr>
</tbody>
</table>
| 4 (Sept. 06) | R4-14 | Conflict Prevention | NGGL to develop a strategy of early warning and preventative action. This could incorporate:  
- Training of external affairs department staff in direct contact with the community on recognition of signs of conflict situations.  
- Creation of a specific position within the External Affairs Department that would be responsible for reviewing and advising on the conflict status of the local community. It could also review design and implementation of programs to ensure that there are no aspects that could lead to a conflicting situation. | Medium   | Q1, 2007                              |
| 4 (Sept. 06) | R4-15 | Monitoring & Evaluation | NEAMU to progressively take over responsibility for production of the internal monitoring report | Medium   | 2007                                   |
| 4 (Sept. 06) | R4-16 | Monitoring & Evaluation | NGGL to clarify household monitoring objectives and to revisit its household survey strategy accordingly, based on a feasible frequency (6-monthly as a maximum, possibly less) and reasonable sample of quantitative interviews in combination with more qualitative instruments, and to consider the use of a socio-economic index to process and present quantitative surveys | Medium   | 2007                                   |
| 4 (Sept. 06) | R4-17 | Monitoring & Evaluation | NGGL to consider NEAMU’s participation in Committee meetings and other engagement opportunities with different stakeholders, to enable NEAMU to gather qualitative monitoring information systematically | Medium   | 2007                                   |
# APPENDIX 1: ACTIVITY LOG

<table>
<thead>
<tr>
<th>Date</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>31/08/2006</td>
<td>Ms. Salam arrives in Ghana.</td>
</tr>
<tr>
<td>01/09/2006</td>
<td>Ms. Salam travels by air from Accra to Project site – Interviews with two affected households in Ola resettlement site.</td>
</tr>
<tr>
<td>02/09/2006</td>
<td>Ms. Salam attends a women’s group meeting, meets with Project personnel on gender issues, and interviews another two households. Mr. Giovannetti arrives in Ghana.</td>
</tr>
<tr>
<td>03/09/2006</td>
<td>Ms. Salam interviews two households and carries out a field visit around the reservoir, and has consultations with villagers in Dokyekrom and Yawusukrom, as well as other families living around the reservoir. Mr. Giovannetti travels by road to Project site.</td>
</tr>
<tr>
<td>04/09/2006</td>
<td>Kick-off meeting. Update brief by OICI at their Ntotroso office. Interviews with two affected households. Meeting with the Ntotroso LARC Committee. Meeting with the Kenyasi 2 LARC Committee. Meeting with the Vulnerable People working group. Meeting with the Asutifi branch of Minister of Food and Agriculture. Meeting with Project staff on grievances and database.</td>
</tr>
<tr>
<td>06/09/2006</td>
<td>Meeting with Project Human Resources manager. Attendance to a public meeting in Kenyasi 2 with members of farmers’ groups organized under the AILAP to supply seedlings. Attendance to a meeting of the Vulnerable People Committee. Close-out meeting with NGGL and OICI staff in Kenyasi 2 camp.</td>
</tr>
<tr>
<td>07/09/2006</td>
<td>Travel from Project site to Accra. Meeting with NGGL’s management in Accra. Departure from Ghana.</td>
</tr>
</tbody>
</table>