

NEWMONT GHANA GOLD LTD - AHAFO SOUTH PROJECT
EXTERNAL SOCIAL COMPLIANCE MONITORING
3rd REVIEW – MAY 2006

Prepared by:

Ms. Tasneem Salam
101707.3616@compuserve.com

Mr. Frédéric Giovannetti
FredGiovannetti@aol.com

Prepared for:

International Finance Corporation, Washington DC, USA

Newmont Mining Corp., Denver CO, USA

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I INTRODUCTION

I.1 GENERAL SCOPE OF THE EXTERNAL COMPLIANCE MONITORING

The Ahafo South Gold Mining Project (“the Project”) entails significant displacement impacts, and more broadly social impacts of significance 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 proceeded to make an inhabited area roughly 3000 hectares in surface available, while construction in this area of the mine and plant has been on-going since then and is currently nearing completion.

Two earlier reviews focusing only on the resettlement and compensation components were undertaken in July and December 2005 by Frédéric Giovannetti, an independent resettlement specialist, under contract with NGGL. The reports of these reviews are publicly available at www.newmont.com and www.ifc.org.

These early reviews were undertaken based on Terms of Reference (ToRs) jointly prepared by NGGL and the IFC, which focused solely on resettlement and compensation.

During the first quarter of 2006, NGGL and the International Finance Corporation (IFC) agreed to broaden the scope of these reviews, and new General Terms of Reference were developed to encompass three broad areas:

- Social compliance, including, but not limited to, resettlement and compensation,
- Environmental compliance,
- Health and Safety compliance.

As far as social compliance is concerned, the new General Terms of Reference include the review of the following:

- Resettlement Action Plan implementation and performance,
- Broad community consultation presented in the Public Consultation and Disclosure Plan (PCDP),
- Broad community development,
- Grievance system management and effectiveness,
- IFC Social policies and guidance,
- Social Action Plan (SAP from the ESIA).

To address the broader issues now in the scope of work of the External Compliance Monitoring, Ms. Tasneem Salam, independent social development specialist, was brought into the external monitoring team.

I.2 SPECIFIC FOCUS OF THIS REVIEW

This 3rd review was undertaken by the two team members from May 1 to May 12, with a close-out meeting held with NGGL’s field team on May 10 and a debriefing at IFC’s Accra office on May 11.

Since the last review, NGGL has started the implementation of two new social mitigation programs:

- The Vulnerable People Program,
- The Agricultural Improvement and Land Access Program (AILAP).

The activities of the reviewers have therefore focused on assessing the implementation arrangements and initial results of these two programs, in addition to checking on earlier recommendations and issues identified previously.

The reviewers’ activities during their stay in Ghana included the following (see detailed activity log in Appendix I):

- Visits to both resettlement sites of Kenyasi (Ola) and Ntotoroso,
- 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 village of Dokyekrom and one family further north,

- Attendance to meetings of the Land Access Review Committee (LARC) and of the Vulnerable People Program Committee,
- 11 interviews with affected households, including:
 - Resettlers at both resettlement sites,
 - Relocates (households which qualified for and opted for cash compensation rather than resettlement),
- Interviews with a group of women at Ntoroso market place,
- Numerous interviews with NGGL team members, including consultants planning Alliance,
- Interviews with representatives of Opportunities Industrialization Centers International (OICI), the NGO tasked, amongst others, with implementing the Livelihood Enhancement and Community Empowerment Program (LEEP), and with Guards of the Earth and Vulnerable (GEV), the NGO tasked with some components of the implementation of the Vulnerable People Program,
- A meeting with representatives of five NGOs (FIAN Ghana, FIAN Germany, WACAM, Earthworks and BIC),
- A meeting with the Lands Commission office in Sunyani,
- A “wrap-up” meeting with the NGGL team at site, and another with NGGL management in Accra that was attended by an IFC representative.

NGGL provided logistics (accommodation) and facilitation (vehicle) to the reviewers. Meetings and interviews were usually held without NGGL representatives attending, and 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 I below, sources: RAP and Internal Monitoring Report, planning Alliance, May 1, 2006):

TABLE I		
Summary of Project Impacts on People, Land, and Structures		
PEOPLE	Households	Individuals
Total number of affected people	1,701	9,575
Of which:		
• Residents:	823	5,185
• Of which:		
• With primary residence in the mine take area	399	2,594
• With primary residence elsewhere	424	2,586
• Non-Residents:	878	4,390
LAND	Fields	Surface (acres)
Affected land	7,674	4,717
STRUCTURES	Number of buildings	
Affected structures	1,568	
Of which complete structures	869	

2.1.2 Summary Progress

The following table shows the present status of some critical progress indicators (Table 2, source: Internal Monitoring Report, planning Alliance, May 1, 2006):

Indicator	Objective	Done	Percentage of Completion 30 April 2006
Number of fields compensated	7,513	7,674	102.1% ¹
Number of buildings compensated	1,568	1,568	100%
Number of resettlement houses complete	399	396	99.2%
- Ola	310	307	
- Ntotoroso	89	89	
Number of households moved into their new resettlement house	399	389	97.5%
- Ola	310	303	
- Ntotoroso	89	86	

2.2 WATER SUPPLY AT RESETTLEMENT SITES

2.2.1 Technical Issues

Ola resettlement site has a piped water system, which is linked to the general Kenyasi 2 water system but has one dedicated borehole, two dedicated tanks on the site, and about 20 standpipe taps. The source of power for the whole Kenyasi 2 water system, including the part of it that serves Ola resettlement site, is the Volta River Authority (VRA) local mid-voltage grid. In contrast, Ntotoroso resettlement site has a stand-alone piped water supply system, including two boreholes with submersible pumps (source of power: local VRA grid), a 90 m³ storage tank and 12 standpipe taps.

At the time of the review, the following technical issues compromised the normal operation of the two systems:

Ola Resettlement Site

- Transformer was deteriorated (likely by lightning),
- An emergency by-pass solution has been put in place and the system was observed to operate more or less normally. Frequent power cuts are, however, a constraint.

Ntotoroso Resettlement Site

- The electrical system protecting the pumps from voltage fluctuations frequently disconnects the pumps from the grid, hence interrupting water supply,
- The caretaker tasked with pump operation fails to reconnect the pumps, because it is located at some distance from the resettlement site, which results in long periods without water.

2.2.2 Management Issues

Observations and interviews in respect of management of the water systems are the following:

- Water does not appear to be always sold from the taps,

¹ The number of fields actually compensated is higher than the number of fields initially identified in the RAP because new fields were identified in the course of implementation.

- Quantities of water actually sold from the taps are relatively small in comparison with the systems capacity (assuming all water is sold at the average price of 100 Cedis per bucket of 18 liters):
 - Paid-for water was 38 liters/day/household in February 2006 at Ntotoroso resettlement site, and 40 liters/day/household at Ola;
 - Paid-for water decreases to 20 l/day/household at Ola in March 2006, which assuming 5 people in average per household represents about 4 liters per capita per day, much less than the usual sizing standard of 20 to 40 liters per capita per day for small piped systems in Ghana;
 - This indicates either that all water produced is not sold, or that consumption is particularly low due to affordability problems or the availability of alternative sources;
- The water production or actual consumption does not appear to be monitored;
- In interviews with 3 household heads potentially qualifying as vulnerable, they indicated that they could not afford water, and were restricting themselves due to the cost, or were trying to obtain access to the taps without paying.

2.2.3 Recommended Way Forward

2.2.3.1 Technical

The technical problems that affect the system need to be clearly identified. The sensitivity of the device protecting the submersible pumps at Ntotoroso may need to be revisited, unless that would compromise the durability of the pumps. Each identified issue (transformer, degradations associated with power fluctuations, others) should be related with an action plan, with responsibilities of the Company, the construction Contractor involved and the Water Board or WATSAN Committee clearly defined.

This action should be taken immediately, after the Water Board and WATSAN Committee (at Kenyasi 2) and the WATSAN Committee (at Ntotoroso) are duly informed. It would be preferable that both management bodies be involved in this technical review.

2.2.3.2 Management

The management capacity of the Kenyasi 2 Water Board, and the two WATSAN Committees must be enhanced. The following is recommended:

- Undertake with OICI, the NGO involved in establishing the Committees and training them, a critical review of OICI's training and support activities in this respect (what has worked, what has not),
- Involve third parties external to NGGL to dissociate NGGL from management issues to the extent possible and help dissipate the perception that NGGL is managing the systems, such as the following
 - Community Water and Sanitation Agency (CWSA - Sunyani branch), whose mandate it is to provide technical support to Boards and Committees and to monitor these systems,
 - A specialised Ghanaian water management consultant
- Develop with the help of the above-mentioned organizations one or several dedicated training sessions for the Water Board and WATSAN Committees; experience indicates that to be effective, such sessions should last about one week and include the following practical topics:
 - Technical aspects: understanding of the whole system and the role of its different components, daily operation, routine maintenance, including drills on the real system;
 - Management:
 - Roles of the different Committee members,
 - Record-keeping,
 - Presentation of different management models:
 - Monthly fee paid by each beneficiary household, with distribution of tags to those who have paid (to be avoided),
 - Water vendors receiving a fixed monthly amount from the Committee plus a percentage of their sales (current system),

- Fully privatised water vendors, charged by the cubic meter by the Committee and free to administer the tap as they please (including fixing the selling price, the opening hours, etc... - on the model of the phone booths);
- Meter reading,
- Simple indicators of operation (see hereunder):
- Incentives for Committee members,
- Specific arrangements for vulnerable households,
- Management of the system in the longer-term (potential involvement of a private operator and related different management models).

2.2.3.3 Monitoring

Simple monitoring indicators need to be developed such as the following:

- Ratio of water distribution (m³) to water production (m³),
- Ratio of total revenue (Cedis) to water production (m³) and water distribution (m³), comparison with the average selling price, allowing to generate an estimate of unaccounted for water,
- Ratio of revenue by tap (Cedis) to water distribution (m³).

The two management entities need to be trained on the use of these indicators, and to implement the measurements and the calculations themselves.

2.2.3.4 Users Awareness

User awareness of the cost and price of water, and of the requirements for system sustainability need to be refreshed. Overall, two key messages need to be delivered to the community at large, and specifically to the resettlers' community:

*“Newmont is not managing these systems, you are.
Sustainability requires you to pay for water, in your own benefit.”*

Recommendation:

- R3-1. 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.

2.3 REVIEW OF THE AGRICULTURAL IMPROVEMENT AND LAND ACCESS PROGRAM

2.3.1 Principles of the Program

In recognition of the impacts of its activities on land and agriculture, and following up on recommendations made by previous external reviews, NGGL, with the assistance of planningAlliance, have prepared during the 1st quarter of 2006 an Agricultural Improvement and Land Access Program (AILAP). Stated objectives are to maintain or exceed pre-Project levels of crop productivity and ensure compensated farmers of the Mine Take Area have access to land.

As stated in the AILAP description, the means to accomplish this are:

- Providing, free of charge, improved agricultural inputs, sufficient for two acres, for one crop season, to every person who was compensated by the Company for cropped land in the Mine Take Area, and who has access to arable land of two or more acres.
- Facilitating land access for every person who was compensated by the Company for cropped landing the Mine Take Area, and who, at present, does not have access to land for cropping, or who has access to less

than two acres of arable land. When persons obtain access to at least two acres of arable land, they become eligible for two acre input packages.

Project Affected People (PAPs) are eligible to NGGL's assistance once they have secured at least two acres of land. The means to obtain land are threefold:

1. A PAP can secure land him/herself through the purchase of ownership rights, or by entering into a sharecropping agreement of their choice, over the surface ;
2. The PAP could also access stool land ("Royal Lands") under a sharecropping agreement; NGGL has negotiated with the representatives of the three stools of Ntotoroso, Kenyasi 1 and Kenyasi 2 to obtain access to stool land (117 acres in Kenyasi 1, 350 acres in Kenyasi 2 and 100 acres in Ntotoroso); this is intended as a safety net for those PAPs who would not be able to secure land themselves; a PAP remaining landless would typically be allocated by the program 2 acres of such land; occupation of such land is agreed through a sharecropping agreement with the stool of which the first two years use are free of charge; if the PAP is unable to develop a sharecropping agreement with the stool then the PAP is expected to utilize the land for the initial two years while securing other land to use after initial two years;
3. A safety net is provided by land that NGGL has direct control upon in the Mine Take Area, but does not require immediately for its mining operations ("Land Bank" concept as expressed in the RAP; about 100 acres of such land are available close to Ntotoroso resettlement site; a PAP accessing "Land Bank" land would become a lessee of NGGL.

There are several types of sharecropping arrangements in the area. One of these arrangements is more favourable to sharecroppers than others in terms of eventual access to land. It is called *Abunu*, and includes the following provisions:

- Payment (usually but not always) of an initial fee by the sharecropper to the landowner or to the traditional witnesses;
- The sharecropper is responsible for planting a cash tree crop (such as cocoa or plantain);
- The sharecropper can plant intercrops such as maize or cassava in between the young trees and harvest them without sharing them with the landlord;
- When the tree crop enters into production (generally after about 3 to 5 years), the plot is shared into two equal parts between the sharecropper, who becomes a traditional owner, and the owner. This is also the time when intercrops are made impossible by the shade of the trees.

One of the principles of the AILAP is that only *Abunu*-type agreements are eligible for assistance. Other sharecropping arrangements (whereby the sharecropper would not become a landowner at the end of the process) are in principle not eligible to AILAP assistance. A model sharecropping agreement is provided to applicants.

When a landowner demonstrates that he/she is prepared to enter into an *Abunu* sharecropping agreement with a PAP, the PAP presents the sharecropping agreement to the program to be entitled to receive an incentive for bringing land to the program ("Land Access Fee" – 1.5 M Cedis maximum for two acres). The intent is to help PAPs get access to land through their own negotiations and arrangements with willing landowners willing to let them access their land under sharecropping arrangements.

Once PAPs demonstrate that they have access to at least 2 acres of land, they are eligible to a package of assistance that includes:

- Initial training session on "farming as a business", that is intended to lead them to the establishment of a "business plan" (essentially the choice of the crops from the program menu that they will farm on the land),
- Assistance in cash to effect clearing of the land (amount variable depending on the type of vegetation on the land),
- Inputs such as seedlings, fertilizers, small equipment, sized for one farming season on 2 acres;
- Extension services.

In addition to NGGL, the AILAP involves the local branch of the Ministry of Food and Agriculture, the traditional chiefs, and OICI. These organizations have formed two Land Allocation Review Committees (LARCs), one for Kenyasi area farmers and one for Ntotroso area farmers.

2.3.2 Process

The AILAP process includes the following steps.

1. Information to the general community about the programme and the process,
2. Registration in NGGL's information centres,
3. Verification of the physical location of the land (2 acres) by a Land Task Force,
4. Signature of the sharecropping agreement (where relevant),
5. "Business plan" training,
6. Establishment of a business plan,
7. Verification of the application and rights to access of the nominated land by the LARC,
8. Delivery of assistance.

Land that is already cultivated by the PAP at the time when the PAP registers is eligible to the program.

2.3.3 Current Status

Implementation of the AILAP started in April 2006. Resettlers and PAPs qualifying as Vulnerable People are prioritized in a first phase. The second phase will handle the case of other PAPs, including relocatees and people who were not residing in the Mine Take Area and were not eligible to either resettlement or relocation.

About 200 eligible PAPs had registered into the program at the time of the review. The great majority of these bring land into the program, meaning that they have already purchased or are about to purchase land, or have entered or are about to enter into a sharecropping agreement with a willing landlord.

2.3.4 Preliminary Assessment

In comparison with the situation that prevailed at the time of the previous visit (December 2005), the conceptualization and the start of implementation of the AILAP represent considerable progress, and it is the reviewers' opinion that the Company has taken steps in the right direction:

- The process for PAPs to access land has been devised, is actually in place and is overall soundly implemented,
- Land has actually been secured with the local traditional authorities, and the principle of a double safety net (Royal Lands, and ultimately Land Bank) is adequate,
- The 11 farming models, and related assistance packages, appear to fit local conditions reasonably well,
- Consultation and information have been effective: the reviewers were pleased to observe that PAPs met generally displayed a proper understanding of the principles and of the process of the AILAP.

The reviewers recognize that the AILAP was in starting mode at the time of the review. The following issues were noted for consideration by NGGL in the near future:

1. Procurement of assistance packages
 - Procuring large quantities of agricultural inputs in time may prove problematic, although it is recognized that the Company has taken steps to prepare procurement through the release of Expressions of Interest;
2. Business planning training
 - One session was observed by the reviewers, and it is unclear whether this type of training indeed matches the needs of all attendees; a certain lack of interest amongst some attendees was visible, and it was sometimes difficult to understand what the involved trainer really wanted to achieve;
 - Not all PAP farmers may be willing to engage in "farming as a business", and therefore the business plan model promoted may not be adequate for all;

3. LARC Committees

- The way the LARC Committees' debates are organised can be improved:
 - taking cognisance of the fact that all participants do not wish to express themselves in English, interpretation of the proceedings must be provided and organized in an orderly manner;
 - the proceedings can be better organized and better prepared;
 - supporting documentation required by the Committee to make decisions should be available before the case is brought to the Committee;
- The objective of the LARC Committees' meetings may need to be sharpened and clarified (“what exactly is the Committee to decide upon?”);
- The number of attendees should be reduced, to the extent possible;

4. Consultation and information:

- While as mentioned above the level of information was generally adequate, it was observed that some PAPs had not received sufficient information when registering; many of the beneficiaries are not too familiar with written English and therefore need supporting verbal information;
- There may have been a misunderstanding about the Company requiring official registration of sharecropping agreements prior to them being submitted to the LARC Committees;

5. Linkages with other programs:

- Interviews with PAPs indicate that there is some confusion between the Vulnerable People program and the AILAP: when asked about the Vulnerable People Program, several interviewees responded that “they were not interested because they would get stool land only for 2 years”; the exact role in the two programs of the arrangement with traditional authorities is a source of confusion;
- Finally, information about the agreement related with Royal Lands occupation was observed to be unclear: some PAPs seem to think that they would be ousted from this land after 2 years.

2.3.5 Recommended Way Forward

Recommendations:

- R3-2. NGGL to make sure that suppliers are available and prepared to deliver in time the large quantities of agricultural inputs that are required.
- R3-3. NGGL to attempt to categorize applicants into the AILAP, for instance between potential business farmers and subsistence farmers.
- R3-4. 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.
- R3-5. 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.
- R3-6. 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.
- R3-7. 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.
- R3-8. 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.

2.4 REVIEW OF THE VULNERABLE PEOPLE PROGRAM

2.4.1 Summary Description of the Program

NGGL has started implementing its Vulnerable People Program in February 2006. This is a major development, as failure to devise and implement activities in direction of affected vulnerable people had earlier been identified as a significant compliance issue.

A process to identify vulnerable people and ascertain their eligibility to participate in the program has been devised. It includes the following steps:

1. Registration, for impacted households which were not resettled, with a first quick review of the socio-economic situation of the household (“form A”),
2. More detailed review of their socio-economic situation at their residence (“form B”),
3. In-depth review of the vulnerability situation at their residence (“form C – Case Report”),
4. Discussion of each case report at a Vulnerable Working Group made up of representatives from OICI, NGGL, Planning Alliance and NGO Guards of the Earth and Vulnerable; this working group decides on whether to accept or reject the case as a vulnerable household and also makes recommendations on support to be given,
5. Submission of the situation of the vulnerable people and proposed recommendations for action to a dedicated Committee,
6. Implementation of the support measures as recommended by the Committee.

Support measures to vulnerable people could include one or several of the following components:

- Food baskets for one month (assuming households of 5 members²), comprising of different staples,
- Medical attention,
- Counselling services (yet to be defined and implemented),
- Fast-tracked access to land under the AILAP,
- Coverage of health expenses under the National Health Insurance scheme (a medical insurance system of the Government of Ghana, where NGGL registers the vulnerable household and covers the cost thereof) - all households considered vulnerable are given this support,
- Training,
- Employment at NGGL (traffic wardens) if available,
- Micro-credit.

The Vulnerable Program implementation process is as follows:

1. NGGL has hired a local NGO (“the Guards of the Earth and Vulnerable” - GEV) to participate in the implementation of the Vulnerable People Program;
2. GEV is handling the initial two stages of the process (Forms A & B for impacted households who were not resettled, see above),
3. A working group formed of representatives of GEV, OICI, NGGL and planning Alliance reviews the case in more detail (Form C),
4. The working group submits cases to the Vulnerable People Committee, which in addition to representatives of the working group also includes representatives of traditional chiefs (chair), and the Regional and District branch of the Department of Social Welfare.

At the time of the visit, about 1,600 households had registered into the Vulnerable People Program. About 50 households are already receiving assistance in one or several of the forms described above.

2.4.2 Preliminary Assessment

The design and implementation of the Vulnerable People Program is a remarkable achievement. The strategy and the process are now in place and both are commendable. The reviewers were particularly impressed with the

² Two baskets could be allocated if the household is larger.

effectiveness of the team in charge of the implementation. It is also worth mentioning that associating a local NGO such as GEV also results in valuable capacity-building of a local civil society organization. The Committee is well prepared, well organized, well chaired and overall remarkably effective in its proceedings. The Working Group is also managed effectively and there is a rigorous analysis of each case.

The following issues have been identified in relation with the Vulnerable Program:

- Recommendations for action made by the Committee are not operational and sometimes remain rather vague; they need to be operationalised; this should not be done by the Committee itself, but rather by the working group following Committee’s recommendations;
- In many instances, the Committee recommends counseling activities, but these need to be devised in detail as only a general concept paper is available for now;
- Micro-credit support has to be defined in more detail (see also section on LEEP);
- Interviews with some PAPs have shown that there was some confusion between the AILAP and the Vulnerable People Program, particularly with respect to the possibility to be allocated a 2-acre plot on “Royal Lands” (see also § 2.3.4 and recommendation 3.8); messages on the details of the two programs with regard to access to this land need to be clarified and communicated again;
- A follow-up mechanism for the recommendations of the Vulnerable People Committee needs to be prepared in more detail;
- Finally, although the Guards of the Earth and Vulnerable are certainly attentive to including the most vulnerable in their initial identification, this is an aspect that needs to be relentlessly reinforced: it is a fact of life that the most vulnerable are precisely those who will be the most difficult to identify, as they usually do not access easily to information and may be unable to register.

2.4.3 Recommended Way Forward

Recommendations:

- R3-9. NGGL to make sure Vulnerable People Committee’s recommendations are made more operational.
- R3-10. NGGL to make sure that counselling activities are defined in greater detail.
- R3-11. NGGL to define a follow-up mechanism to monitor the implementation of recommendations of the Vulnerable People Committee
- R3-12. NGGL to continue to make sure that the most vulnerable are indeed captured in the program

2.5 GRIEVANCE MECHANISMS

2.5.1 Situation

Deficiencies in the grievance management mechanism had previously been identified by the reviewers (refer to previous reports). There has been progress since the last review, which includes:

- Information centres are now available to all community members willing to lodge a grievance;
- A grievance form has been developed and is in use;
- The officer in charge of grievance management has opened a manual register of grievances that proves a useful logging and tracking tool.

However, upgrades to the grievance management system are still required: not all grievances are logged, the tracking remains weak, and it is still impossible to measure the grievance management performance as the numbers of open and closed grievances are impossible to calculate.

2.5.2 Recommended Way Forward

NGGL is currently contemplating a major change in its information management system, with the possible introduction of an integrated GIS/database system. The reviewers recognize that insofar as this change is scheduled during the course of 2006, it would be unreasonable to recommend another change to the grievance management mechanism. It is more practical to integrate grievance management requirements in the terms of reference for the procurement of GIS/database related services, and it was observed that this was indeed NGGL's intention.

Recommendation:

R3-13. NGGL to integrate grievance management requirements into the scope of work for provision of GIS and database-related services.

2.6 LIVELIHOOD ENHANCEMENT AND COMMUNITY EMPOWERMENT PROGRAM (LEEP)

2.6.1 Situation and Assessment

The LEEP, which targets only Project-Affected People, includes six components:

1. Agriculture,
2. Technical and vocational training,
3. Small and Medium Enterprises (SMEs),
4. Micro-credit,
5. Water and Sanitation,
6. Resettlement “casework”.

The LEEP has been successful in delivering a number of benefits to the affected people, including agricultural support, income earning opportunities through activities such as rearing of grasscutters, and some organisational capacity building programs. People have also been encouraged to use the land area around their plots on the resettlement site for activities such as planting of maize.

Whilst these achievements have brought benefits to the community the program itself is affected by a number of structural difficulties. These are set out below:

- Delays in delivery of certain promised inputs (e.g. grasscutters). This is often due to non-availability rather than any inefficiency on the part of OICI.
- People who have been involved in SME training such as soap making or batik dyeing have not been given further guidance or support on how to use these skills to start some kind of income generating activity.
- This has to a large extent been due to delays in the micro-credit program for which the design has been formulated but the funds are yet to be released. The need to operationalise a micro-credit scheme was recommended in the first review and during the second review it was understood that such a scheme would be in place in the first quarter of 2006, but this has yet to materialise. The Internal Monitoring Report for the first quarter of 2006 states that ten Community Development Officers and one finance credit officer have been trained in the credit process. Moreover, 32 groups have received training for micro-credit. These activities may need to be repeated once the micro-credit program is in place.
- The organisational capacity building component has focused on development of the WATSAN committees and youth groups. Particularly with regard to the former, as discussed in Section 2.2, the effectiveness has been limited. Part of the reason is the context of the resettlement sites which comprise families which were not previously living as a community. Thus the sense of being part of a community and what that entails with regard to collective decision-making and action for mutual benefit and shared resources require development over time.

- At present, although LEEP is organised around an overall strategic objective, the program as it is implemented seems to be a mix of different activities without much relationship to each other. There is lack of a development framework to set the context and link the different activities. There is, therefore, a lack of connectedness with the reality of people’s lives.

In addition to these structural issues, it also needs to be recognised that there are now a number of other programs targeted at PAPs, which had not been in place when LEEP had started. It is therefore appropriate to revisit the formulation and implementation strategy of LEEP for the long-term. Appendix 3 presents suggestions in this respect.

2.6.2 Recommended Way Forward

Recommendation:

- R3-14. 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) a mid-term external evaluation;
 - b) development of a strategic framework;
 - c) action plan for implementation which takes account of inter-connection between the different activities.

2.7 LAND TITLES

2.7.1 Situation

No land lease has been issued as yet for the resettlement plots. A first batch of 57 applications was introduced to the Lands Commission on May 5, 2005. One year later, these applications have been formally approved by the Sunyani Board of the Lands Commission, but are still pending final preparation of the “indenture” documentation and signature by the Chairman of the Board. A second batch of about 200 applications has also been introduced to the Lands Commission, and issuance of related titles is expected to follow the first batch closely.

The issuance of the leases involves a complex process, which has been facilitated by NGGL and planning Alliance, particularly in terms of providing the base technical information and drawings. Discussion with representatives of the Lands Commission indicates that the main obstacles to the timely issuance of land leases are the following:

- Sunyani Board of the Lands Commission meets only 4 times a year,
- Administrative process is lengthy (e.g. typing the “indentures” with a manual typewriter).

Another issue related with land leases is the fact that as per Ghanaian law, lessees (the resettlers) will have to pay a modest lease to the Office of the Administrator of Stool Lands. This may potentially develop into a contentious issue, and NGGL needs to take a pro-active attitude in preparing the resettlers’ community to this fact.

2.7.2 Recommended Way Forward

Recommendation:

- R3-15. 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.
- R3-16. NGGL to facilitate computerization of the production of the indentures by the Sunyani Branch of the Lands Commission.
- R3-17. NGGL to communicate with resettlers the administrative requirements associated with lease issuance which will be paid to the Office of the Administrator of Stool Lands.

3 BROADER COMMUNITY ISSUES

3.1 COMMUNITY CONSULTATION AND ENGAGEMENT

3.1.1 Current Awareness of Programs by PAPs

As reported in the previous reviews, the various public consultation and information dissemination exercises carried out by the Project was observed to have reached remarkable results. The reviewers were happily surprised to see that even in the case of the fairly complicated programs currently being implemented (AILAP and Vulnerable Peoples Program) the level of understanding is quite high.

Some issues do remain however, particularly the need for continued vigilance with regard to ensuring that a special effort is made in conveying information to more vulnerable and marginal groups.

3.1.2 Project Organizational Structure for Community Engagement

Community consultation has been carried out through a number of channels:

- a) the work of StratCom;
- b) community engagement by the public consultation officers;
- c) program implementing organizations such as OICI and planning Alliance.

Recently important changes have been made to the organizational structure of community consultation responsibility. These comprise two specific positions:

- Principal Communication Officer. A new position has been created to co-ordinate community consultation/engagement activities of the Project and this is filled by an NGGL employee rather than a contractor. The co-ordination role is very important as there are so many different levels at which the Project interacts with the community, with regard to resettlement and mitigation and also with regard to the various development programs. There is thus a requirement not only for co-ordination of activities but also to ensure that the same messages are being given out to the communities by all involved in community engagement.
- Women's liaison officer. A new position has been created within the consultation unit staffed by StratCom to develop and promote activities to support women in the project affected area. Given the context of the role of women in Ghanaian society (see section 3.3 below) this is a much needed initiative.

Pending organizational changes include the replacement of the Resettlement Negotiation Committee (RNC) with the Community Consultative Committee (CCC). The RNC is still in place and there are a few remaining issues which the sub-committees of the RNC have been dealing with. Procedure for selection of CCC members is being developed and it is understood that the members will be elected, but the exact role of the CCC is still to be considered. An important role that it could play is to coordinate the activities of all the other committees.

Much of the decision making on programs implemented by the Project is through various committees and overall as an approach this is functioning quite well. It is however important to ensure that overlaps and any contradictions in the activities of the various committees are addressed; the CCC would be well placed to do so.

3.1.3 Recommended Way Forward

Whilst good work has been done by the Project on public consultation, it should be remembered that public engagement is a long term and continuous process. In view of this it would be useful to develop an action plan for community engagement in the future which sets out the different stakeholders, their key characteristics and frequency of interaction (by both the Company and implementation partners such as OICI) and media used.

Recommendation:

- R3-18. NGGL to review and revise the current public consultation and disclosure plan into an ongoing program to be implemented during Operations. A part of this would be to formulate a stakeholder engagement action plan which identifies and categorizes all the different types of stakeholders, e.g. resettlers, NGOs, Kenyasi 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.

3.2 NON- PAP PROJECT IMPACTED PEOPLE

3.2.1 Situation

In addition to the PAPs, who received compensation for direct losses, there are other communities who have also been impacted by the Project. Most notable are those in the 500m zone around the Water Storage Facility (WSF), but they are not the only communities impacted. It is important that all communities impacted and the exact nature of their impacts are identified and recorded in a systematic way and a plan developed to address how negative impacts will be mitigated.

The communities in the 500m zone around the WSF have experienced significant impacts with regard to severance from farm land, difficult access to JSS level schools and increased incidence of mosquitoes. The farmers interviewed in Dokyekrom mentioned that whilst before they could walk to their fields in half an hour, the severance caused by the WSF meant that it could take them up to two and half hours to walk to their fields. In general there is concern with regard to health and safety around the dam. To address these issues, a Water Dam Residents Committee has been created with Traditional Leaders of Kenyasi No.2 and Ntoroso, District Education Office, District Assembly, OICI, NGGL and 17 members of the community.

Action has been taken to mitigate access issues including provision of a transportation facility in the form of a bus which picks children up from the village of Dokyekrom to Yawusukrom in the morning and then back again in the afternoon. The long term solution proposed is to upgrade the school at Dokyekrom to a JSS facility. In between these times the bus can be used as a general transport mode by other people in the village. It has in particular been used by farmers to reduce the time taken to reach their fields. One farmer complained, though, that the bus did not run on Saturday which for him was an important day for farming.

In addition to transportation, NGGL has made provision for potable water tanker service around the WSF. Eight “polytanks” of various sizes ranging from 250 gallons to 1000 gallons have been placed at various points in the surrounding area. The reviewers noted that they were functioning and in use by the community. In addition there are a number of hand dug wells with handpumps. Moreover, water collection points are provided at various points around the reservoir.

3.2.2 Recommended Way Forward

With regard to other communities impacted, the reviewers have received no information either on the impacts or what mitigation measures are planned if any.

Recommendations:

- R3-19. 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.
- R3-20. 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.

3.3 GENDER MAINSTREAMING

3.3.1 Situation

The position of women in Ghanaian society is certainly complex and the reviewers do not claim to have an in-depth understanding of the situation. What is stated proudly by both men and women in Ghana is that women are regarded very highly. It is observed by the reviewers that:

- Women are involved in all areas of economic activity, both agricultural and non-agricultural.
- Women take on a very high proportion of household responsibility, from looking after the children and elderly relatives to collecting water, cooking and cleaning.
- Many affected households are female headed. The exact reasons for this are not clear, whether the women are deserted, widows or have decided to create their own separate household.
- There are also many polygamous households with one man and several wives. Sometimes all the wives share one house, in other cases the wives are placed in different units.
- In spite of women's significance in the social and economic sphere, when it is a matter of important decision making within the community or household, they are rather invisible. A group of women consulted in the market place of Ntotoroso agreed that when it came to important decisions it was the men who took the lead. This dichotomy can be seen for example in the composition of the AILAP committee where in the Ntotoroso LARC committee there is only one female representative (a Queen Mother).

3.3.2 Recommended Way Forward

The paradoxical reality of women's lives in Ghana is something which is not factored into program design. Whilst the creation of the special position in Stratcom (mentioned in section 3.1.2 above) can play an important role in addressing the needs of women, there should also be a concerted effort made to mainstream gender consideration in the development of other programs.

Recommendations:

R3-21. 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.

3.4 COMMUNITY SAFETY AND HEALTH

3.4.1 Traffic

Speed limits are placed along main roads in the Project area and vicinity. On the whole these are observed by Project vehicles, though one or two instances of apparent violation have been observed. Measures to ensure enforcement should be strengthened.

The school at Ntotoroso resettlement site is adjacent to the main road leading from Kenyasi through the Plant Site to Ntotoroso. The road is frequented by heavy vehicles. At present the school is not fenced and there are no advance traffic warning signals to indicate to drivers the presence of the school. This presents a risk to the safety of children and should be addressed immediately.

Recommendation:

- R3-22. NGGL to make improvements to traffic management through the following measures:
- Enforcement of speed limits
 - Advance warning signals for school at Ntotoroso resettlement site

3.4.2 Blasting

Consultation with the community indicated that advance warning for blasting is in place.

3.4.3 Street Lighting at Resettlement Sites

Provision for street-lighting is available in the resettlement sites, but at the time of the third review it was observed that all street lights were not properly functioning. This presents a safety risk in an area where there is a level of density of development and many families with young children. How this can be resolved in the long term is unclear. VRA is responsible for lighting and the cost of street-lighting is usually recovered as a levy on individual house electricity bills. Since none of the houses in the resettlement sites are connected to electricity it is not clear whether VRA would be willing to pay for the cost of street-lighting.

Recommendation:

- R3-23. 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.

3.4.4 Mosquitoes and Mine Related Diseases

Communities around the Water Storage Facility (WSF) have reported an increase in the incidence of mosquitoes and have expressed a concern of family members contracting malaria. The Company has appointed an entomologist to visit the area and make recommendations on the impact of the WSF on the prevalence of mosquitoes and mitigation measures. Meanwhile the Company is to start a campaign of making available bed-nets at the cost of 10,000 Cedis per net with further mitigation measures such as spraying of individual houses being considered. On the penultimate day of the monitoring field visit the review team was informed that the bed-nets had been purchased and would be distributed shortly. The review team considers the cost of 10,000 Cedis per net to be appropriate. It not only provides a significant subsidy and therefore increases affordability, but also ensures that the nets are valued.

A few people mentioned their concern to the reviewers about the possibility of mine-related diseases. In all cases these were concerns that arose through hearsay. Specific diseases were not mentioned to the monitoring review team, but according to NGGL Project staff, people have been mentioning concerns about various diseases. It is an international concern which is receiving a fair level of exposure and in fact mine related environmental and health concerns have, for example, been recent news topics on the BBC World Service and are being discussed widely as far afield as Europe. In this context it is not surprising that communities are concerned about the health impact of this large project. It is imperative that NGGL explain to the community in clear and simple terms the health risks related to the mine construction and operations so that rumors of negative impact do not escalate.

Recommendation:

- R3-24. 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

Employment was not the focus of this third monitoring review and will be something which is addressed in more detail in the next review. From discussions with NGGL it appears that the process for recruitment is sound and that health and safety procedures are in place. It is worth noting that 42% of employment for this Construction Phase is from the local area –that is the area within the footprint / mining lease of the Project.

As the Project moves from Construction Phase to Operations, there will be a significant reduction in the labor force. NGGL has developed what appears to be a socially responsible approach to retrenchment, which involves group meetings to explain to workers that their contract has come to an end and to help them in writing CVs which can assist in finding future employment. This process will be checked in the field in the next review.

3.5.2 Procurement

Local procurement can play a very significant role in bringing about sustainable livelihood enhancement. Thus existing efforts on local procurement should be enhanced. NGGL has made a significant step forward in increased effort to promote local procurement through the creation of a dedicated position to look at local procurement opportunities. Two issues are important with regard to local procurement:

- The demand side effort must be matched by support on the supply side so that local people and businesses can take up procurement opportunities. This is likely to require a level of intensive support.
- It is important that local contractors are aware of and encouraged to apply similar socially responsible rules for employment and disengagement as that of NGGL.

There are various examples of successful local procurement in major infrastructure development throughout the world, including examples of where totally new co-operatives have been set up and trained in vocational and business skills and are now successful suppliers of goods. One example is the Women’s Co-operative “Umid” in Azerbaijan which supplies protective clothing to the oil industry. NGGL can also learn from the experience of Newmont’s operations in Peru.

Recommendation:

R3-25. 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.

R3-26. NGGL to check that all contractors apply sound employment and disengagement practices.

3.6 OTHER SOCIAL RISKS – CONFLICT PREVENTION

To quote the UK’s Department for International Development (DFID):

“Ghana is considered an ‘island of peace and stability’ in the West Africa Sub-Region. The country has had four consecutive free and fair elections and democracy and freedom of expression is deepening”

This is an encouraging context for the Ahafo South Project. Certainly in this monitoring review no apparent tensions were perceived by the reviewers. Nevertheless it is prudent to exercise caution and take a pro-active approach to the issue of potential conflict for the following reasons:

- Throughout the world, there are examples of resource development projects with a major physical presence which have either been a catalyst for, or created, social conflicts which have sometimes taken a violent turn.
- The Brong-Ahafo region whilst peaceful does have a number of characteristics which indicate the need for a cautious approach:
 - It is a region of in-migration from other parts of Ghana. The in-migrant population whilst integrated to a certain extent, still retain links to their home region.
 - The in-migrant population has religious and ethnic differences to the host population,
 - More significantly, the in-migrant population is economically less well-off than the host population.
 - Very significantly, there is a scarcity of resources, particularly land.
 - A complicating factor is an elite structure which controls access to land.
 - In addition, RAP mitigation measures necessarily interact differently with the different groups.

Given this context NGGL should develop a strategy which enables early warning and preventative action. Such a strategy needs, however, to be expedited with care so that it does not itself encourage a situation of conflict. One approach would be to appoint one or two people within the Project team who would have specific responsibility for recognizing and identifying potentially problematic situations. Training in recognizing conflict could be given to a wider group within the External Affairs Team so that there is overall awareness by all who interact with the community. Conflict prevention is a technically complex sector and needs to be approached with care, the IFC and World Bank should be able to provide further guidance and support in this matter.

Recommendation:

- R3-27. 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 NEAMU

NGGL, with technical support from OICI, is embarking on an ambitious monitoring approach, known as Newmont External Affairs Monitoring Unit (“NEAMU”). A dedicated monitoring unit is expected to be put in place shortly, and preparatory work is well advanced. The unit coordinator has been developing tables of indicators, based on external and internal consultation and on the monitoring commitments made by NGGL to lenders and other parties in publicly disclosed documents. The reviewers will follow with great interest this innovative approach. For the time being, it is recommended to focus the approach on those indicators that NGGL has clearly committed to monitor in publicly disclosed documents, and to avoid too great a multiplication of indicators that may prove to be too ambitious to monitor on a regular basis.

Recommendation:

- R3-28. NGGL to keep NEAMU focused on indicators committed upon in publicly disclosed documents, at least during a warming-up period.

4.2 DATABASE

Since the start of its activities, NGGL has been using a socio-economic database initially developed by planning Alliance for compensation and resettlement purposes. This database records entitlements for compensation at individual level. A given individual may therefore appear several times in the database, if he/she has several entitlements (for instance a crop and a building). A given household may also appear as many times as the household members have received compensation for different entitlements.

NGGL has recognized that this database needed to be significantly upgraded to cater for further monitoring needs. Specifically, the future database will be organized around households rather than compensation. This is a complicated task in the Ghanaian context, but will be supported by information collected through AILAP and the Vulnerable People Program. Several options are currently being considered, in relation with the NEAMU project.

4.3 LIVELIHOOD RESTORATION REPLICATE SURVEYS

NGGL and OICI presented preliminary results on the first campaign of household surveys carried out in March and April 2006. About 400 households (including resettlers, relocatees, and non residents) have been administered a comprehensive questionnaire, whereas qualitative instruments were also used. The report was not available at the time of the review as the field exercise had just been completed. It is NGGL’s intention to conduct such surveys on a quarterly basis. It was observed that the sample was extracted from the existing database. As a result, the stratification of households may be flawed, as the sample has been extracted based on compensation entitlements rather than on household identification for reasons detailed in the section above.

The reviewers observe that a quarterly survey may be time-consuming and that there is a risk of accumulating large amounts of data that would remain only partially processed. It is recommended instead to combine quantitative surveys at a lower frequency (six-monthly or annually) with qualitative monitoring at a more frequent level. NGGL is revisiting its monitoring strategy in this perspective, and the proposed strategy will be assessed during the next review.

Recommendation:

R3-29. NGGL to revisit its household survey strategy, based on a feasible frequency (6-monthly) and reasonable sample of quantitative interviews in combination with more qualitative instruments

5 FOLLOW-UP ON PREVIOUS RECOMMENDATIONS

The following table (**Table 3**) presents the progress on recommendations made in the previous reviews and which the previous review (December 2005) concluded were still pending:

Review	#	Issue	Recommendations	Status
08/05	2	Vulnerable persons	<ul style="list-style-type: none"> • Company to develop household vulnerability criteria, • Company to involve the community in developing these criteria, • Company to identify vulnerable people by application of the above criteria, including both resettlers and relocatees, and to involve the community in this identification exercise, • Company to devise support measures, which could include, amongst others: <ul style="list-style-type: none"> • Provision of poultry / sheep, and related training, • Provision of garden plots, of seeds and small tools, and of related training, • Only where needed, food or cash assistance, • Company to devise vulnerable people monitoring measures, within the general monitoring framework. 	Closed, superseded by recommendations of the current review
08/05	3	Water and Sanitation Committees	<ul style="list-style-type: none"> • Company to reinforce message that water has a cost and this cost must be borne by the users in conformance with current Ghanaian Government policies. • Company to monitor water sales and money management by WatSan committees. • Company to consider giving an incentive to Committees as a function of their sales. 	Closed, superseded by recommendations of the current review

TABLE 3				
Summary of Recommendations Made in previous Report				
Review	#	Issue	Recommendations	Status
08/05	7	Land replacement	<ul style="list-style-type: none"> Company to make land replacement a top priority for the first quarter of 2006. Company to prepare a brief action plan with milestones within Q1, 2006, that should include details on the general strategy presented in the RAP: <ul style="list-style-type: none"> <u>Land offer</u>: Reach out to Chiefs and landowners, and put in place a bank of available plots inside and outside the Mine Concession, <u>Land demand</u>: Group resettlers interested by land under their sub-chiefs and chiefs, and put in place a list of demand, <u>Facilitation strategy</u> (for example assistance to clear elephant grass on fallow or uncultivated land, provision of seedlings of cash crops or subsistence crops, provision of technical assistance through LEEP), Redeployment of compensation staff, Consultation activities. 	Closed, superseded by recommendations of the current review
08/05	10	Grievances	<p>Improve the grievance logging system to allow for:</p> <ul style="list-style-type: none"> Follow-up of successive letters and events related with one single grievance in one grievance record, Clear relation between electronic log and filed paper documents. 	Closed, superseded by recommendations of the current review
12/05	1	Land titles	<ul style="list-style-type: none"> Company to make sure that the process of issuing land titles for resettlers is expedited, Company to assess potential gaps in the capacity of the Lands Commission to process these titles, Company to address these gaps if necessary (for instance: temporary secondment of administrative staff, computer equipment). 	Closed, superseded by recommendations of the current review
12/05	2	Monitoring	<p>As of 1st quarter 2006:</p> <ul style="list-style-type: none"> Company to generate monitoring indicators as per the RAP Figure 30 Company to produce quarterly report as per structure in Annex 2 <p>In 1st half of 2006:</p> <ul style="list-style-type: none"> Company to organize 1st livelihood restoration monitoring household survey Company to develop specific monitoring mechanism for vulnerable people, based on community involvement in the form of two dedicated committees, one for Kenyasi 2 and one for Ntotoroso. 	<p>Actions taken.</p> <p>Closed, superseded by recommendations of the current review</p>

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 4** below.

TABLE 4					
Summary of New Recommendations					
Review	#	Issue	Recommendation	Priority	Time Frame for Start of Implementation
3 (May 06)	R3-1	Water at resettlement sites	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.	High	Q2, 2006
3 (May 06)	R3-2	Land Access	NGGL to make sure that suppliers are available and prepared to deliver in time the large quantities of agricultural inputs that are required.	High	Q2, 2006
3 (May 06)	R3-3	Land Access	NGGL to attempt to categorize applicants into the AILAP, for instance between potential business farmers and subsistence farmers.	High	Q2, 2006
3 (May 06)	R3-4	Land Access	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.	High	Q2, 2006
3 (May 06)	R3-5	Land Access	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.	Medium	Q2, 2006
3 (May 06)	R3-6	Land Access	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.	Medium	Q2, 2006
3 (May 06)	R3-7	Land Access	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.	Medium	Q2, 2006
3 (May 06)	R3-8	Land Access	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.	High	Q2, 2006

TABLE 4
Summary of New Recommendations

Review	#	Issue	Recommendation	Priority	Time Frame for Start of Implementation
3 (May 06)	R3-9	Vulnerable People	NGGL to make sure Vulnerable People Committee's recommendations are made more operational.	High	Q2, 2006
3 (May 06)	R3-10	Vulnerable People	NGGL to make sure that counselling activities are defined in greater detail.	Medium	Q2, 2006
3 (May 06)	R3-11	Vulnerable People	NGGL to define a follow-up mechanism to monitor the implementation of recommendations of the Vulnerable People Committee	Medium	Q3, 2006
3 (May 06)	R3-12	Vulnerable People	NGGL to continue to make sure that the most vulnerable are indeed capture in the program	High	Q2, 2006
3 (May 06)	R3-13	Grievances	NGGL to integrate grievance management requirements into the scope of work for provision of GIS and database-related services.	Medium	Q3, 2006
3 (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: <ul style="list-style-type: none"> - 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	Q3, 2006
3 (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.	Medium	Q3, 2006
3 (May 06)	R3-16	Land Titles	NGGL to facilitate computerization of the production of the indentures by the Sunyani Branch of the Lands Commission.	Medium	Q2, 2006
3 (May 06)	R3-17	Land Titles	NGGL to communicate the annual rent that resettlers pay to the Office of the Administrator of Stool Lands once the leases are issued.	Medium	Q2, 2006

TABLE 4					
Summary of New Recommendations					
Review	#	Issue	Recommendation	Priority	Time Frame for Start of Implementation
3 (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 categorizes all the different types of stakeholders, e.g. resettlers, NGOs, Kenyasi 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.	Medium	Q2, 2006
3 (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: <ul style="list-style-type: none"> - 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. 	High	Q3, 2006
3 (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	Medium	Q2, 2006
3 (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: <ul style="list-style-type: none"> - 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. 	High	Q2, 2006
3 (May 06)	R3-22	Community Safety	NGGL to make improvements to traffic management through the following measures: <ul style="list-style-type: none"> - Enforcement of speed limits - Advance warning signals for school at Ntotroso resettlement site 	High	Q2, 2006

TABLE 4					
Summary of New Recommendations					
Review	#	Issue	Recommendation	Priority	Time Frame for Start of Implementation
3 (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.	Medium	Q2, 2006
3 (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.	Medium	Q3 or Q4, 2006
3 (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: <ul style="list-style-type: none"> - 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. 	High	Q4, 2006
3 (May 06)	R3-26	Employment	NGGL to check that all contractors apply sound employment and disengagement practices.	High	Q3, 2006
3 (May 06)	R3-27	Conflict Prevention	NGGL to develop a strategy of early warning and preventative action. This could incorporate: <ul style="list-style-type: none"> - 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. 	High	Q3, 2006
3 (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.	Medium	Q2, 2006
3 (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	Medium	Q3, 2006

APPENDIX I: ACTIVITY LOG

Date	Activity
01/05/2006	International travel to Accra from Barcelona and Marseille
02/05/2006	Travel to Project site, Brief by NGGL team members, with focus on the two new programs (Land access and vulnerable people), Discussion of OICI survey
03/05/2006	Discussion of monitoring and evaluation, Visit to Ola resettlement site, Face to face interview with one female household head, Participation in a meeting of the vulnerable people committee, Discussion of vulnerable people program with Guards of the Earth and Vulnerable
04/05/2006	Review of the AILAP registration and review process, Attendance to the agricultural business plan training session, Meeting with OICI on LEEP, Attendance to a meeting of the Kenyasi 2 LARC committee, Review of the vulnerable persons registration process with GEV and interviews with 3 households applying as vulnerable
05/05/2006	Meeting on database upgrade, Review of the grievance process, Participation in the Ntotoroso LARC committee meeting, Visit of the Ntotoroso resettlement site, Face to face interview with two heads of household
06/05/2006	Visit of the area around the water storage reservoir, Visit of the village of Dokyekrom and interviews there. Visit of some scattered farms in this area with review of water supply and transport issues through interviews with residents, 4 face to face interviews in Ntotoroso town and resettlement site
07/05/2006	Meeting with representatives of NGOs FIAN Ghana, WACAM, Earthworks, Bank Information Centre, and FIAN Germany; 4 face to face interviews in Kenyasi 2 town and Ola resettlement site
08/05/2006	Attendance in a meeting of the Vulnerable People working group, Attendance to field surveys undertaken by the AILAP task force
09/05/2006	Meeting with groups of women in Ntotoroso town, Meeting with Lands Commission in Sunyani, Meeting with NGGL team
10/05/2006	Work on presentation and report, Presentation to NGGL team, Review of survey
11/05/2006	Travel from Project site to Accra, Presentation to NGGL management and one IFC representative in Accra
12/05/2006	International travel from Accra to Barcelona and Marseille