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REPUBLIC OF GUINEA



Work –Justice –Solidarity

MINISTRY OF MINING AND GEOLOGY

MINISTRY OF ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

GUINEA NATURAL RESOURCES, MINING AND ENVIRONMENTAL MANAGEMENT PROJECT

[P168613]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Updated - For Negotiations

September 2026

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Guinea ("the Recipient") is implementing the Guinea Natural Resources, Mining and Environmental Management Project ("the Project"), with the involvement of the Ministry of Mining and Geology (MMG), the Ministry of Environment and Sustainable Development (MESD) and its public bodies, the Guinean Office of Parks and Reserves (OGPNRF) and the Guinean Environmental Agency (AGEE), and the Guinea Conservation Trust Fund (Guinea- CTF), as set out in the Original and Additional Financing Agreement (the Agreements). The International Development Association ("the Association") has agreed to provide the original financing and additional financing with the contribution of the Global Partnership For Sustainable And Resilient Landscapes (PROGREEN); the Scaling Climate Action By Lowering Emissions Trust Fund (SCALE); the Global Biodiversity Framework Fund (GBFF) and the Partnership For Market Implementation Facility (PMIF) which are providing grants for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.

2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.

3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.

4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreements. The Recipient shall promptly disclose the updated ESCP.

5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT		

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
A	**ORGANIZATIONAL STRUCTURE** a. Maintain a Project Implementation Unit (PIU) within the Ministry of Mining and Geology (MMG), with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including one (1) Social Specialist and one (1) Environmental Specialist. b. Maintain one (1) environmental specialist and one (1) social development specialist in AGEE for the monitoring of E&S risks and impacts related to the Project's Component C. c. E&S Technical Assistance shall be maintained to strengthen the capacities of the AGEE. This will allow :(i) assessing the capacities and training needs of the AGEE staff and (ii) to resort to specific external expertise. d. The Guinea Conservation Trust Fund ("Guinea-CTF") Secretariat shall recruit one (1) environmental and social specialist and one (1) Community development specialist, responsible for managing all E&S obligations for the Guinea-CTF implemented activities under the Additional Financing (AF). e. Enter into Subsidiary agreement with the Guinea-CTF to manage E&S risks and impacts of activities under components A and C of the Additional Financing. f. Update the Memorandum of Understanding (MoU) with ANAFIC to integrate the following AF activities: community feedback mechanism, National Grievance Redress Mechanism in the additional landscapes and community participatory approach in budgeting, planning and decision-making to channel income-generating activities resources. g. Maintain the agreement with AGEE on environmental and social periodic audits of mining companies and other major industries and projects.	a. Maintain the PIU with the environmental specialist and the social specialist throughout Project implementation. b. The environmental and the social development specialist shall be maintained throughout Project implementation. c. Maintain the E&S technical assistance during the first year of Project implementation. d. Recruit a dedicated E&S Specialist and a Community development specialist within the Guinea-CTF Secretariat within three (3) months of the AF Effective Date and thereafter maintain these positions throughout Project implementation. e. Adopt the Subsidiary Agreement prior to the commencement of Guinea- CTF-implemented activities under Components A and C of the AF and thereafter maintain and implement it throughout Project implementation. f. Update the MoU with ANAFIC within one (1) month after the AF Effective Date. g. Maintain the agreement with AGEE throughout the Project implementation.	a. MMG b. AGEE c. PIU d. Government of Guinea (PIU)/ Guinea-CTF e. Minister of Economy and Finance /Guinea-CTF f. PIU/ANAFIC g. PIU/AGEE

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	**CAPACITY BUILDING PLAN/MEASURES** Prepare and implement the capacity building plan for PIU staff, Guinea-CTF Secretariat, OGPNRF/rangers, AGEE, Government line agencies, Mining operators, NGOs, CBOs, Communities, Project workers on: • Environmental and social screening • Occupational Health and Safety • Benefit Sharing Plan • Gender and social inclusion • Prevention and Management of risks related to Gender-based violence (GBV), Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) • Stakeholder engagement and grievance management • Occupational Health and Safety for rangers and other workers • Community Health and Safety • Labor and working conditions including child-labor/age verification • Sustainable land-use practices • Community co-management • Implement any other OGPRNF Institutional Assessment relevant capacity building measures	Prepare the capacity building plan covering the entire duration of the Project, no later than three (3) months after the AF Effective Date. Provide training annually, with updates as necessary throughout Project implementation.	PIU
MONITORING AND REPORTING			
C	**REGULAR REPORTING** Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. • Guinea-CTF reporting on E&S due diligence and management of financed activities	Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than fifteen (15) days after the end of each reporting period.	PIU

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	**CONTRACTORS' MONTHLY REPORTS** Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.	Submit the monthly reports to the Association upon request, as annexes to the reports submitted under Action C above.	PIU
E	**INCIDENTS AND ACCIDENTS** a. Promptly notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request. b. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	a. Notify the Association no later than forty-eight (48) hours after learning of the incident or accident. Provide available details upon request. b. Provide review report and Corrective Action Plan to the Association no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association. This systematic reporting shall be maintained throughout Project implementation.	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	**ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS** 1. Update the mining sector SESA in light of the assessment carried out to assess progress of the initial SESA implementation. 2. Prepare a SESA for the Guinea protected areas network development 3. Prepare a SESA as part of the Emission reduction program development 3. Prepare and implement a detailed or simplified Environmental and Social Impact Assessment (ESIA) as set out in the ESMF, and corresponding Environmental and Social Management Plan (ESMP) for activities under component C2 of the Project consistent with the relevant ESSs. 4. Implement the parent Project Environmental and Social Management Framework (ESMF) for the AF activities not being implemented by the Guinea-CTF funding mechanism, consistent with the relevant ESSs. 5. Require OGPRNF, NGOs and community-based organizations to prepare and implement the subproject site-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), as set out in the ESMF. The proposed sub-projects activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.	1.Update the mining sector SESA by October 2026 and implement its recommendations throughout Project implementation. 2. By June 2027 and implement its recommendations for the Protected area network implementation 3.Before finalizing the ERP design. 3. Prepare the ESIA and ESMP prior to implementing activities under component C2 and thereafter implement the ESIA and ESMP throughout Project implementation. 4. Implement the ESMF throughout Project implementation. 5. Prepare the ESIA/ESMP and incorporate the ESIA/ESMP as part of the respective bidding documents for the respective subproject prior to the carrying out of subproject that requires the preparation of such ESIA/ESMP. Once finalized, implement the respective ESIA/ESMP throughout Project implementation.	PIU

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	**MANAGEMENT OF CONTRACTORS** Incorporate the relevant aspects of the ESCP, including, inter alia,, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.	PIU
1.3	**TECHNICAL ASSISTANCE** Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation.	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT PROCEDURES** Update, disclose and implement the Labor Management Procedures (LMP) for the Project and the AF. Contractors shall be required to adopt a code of conduct for Project workers including measures addressing risks relating to GBV and in particular SEA/SH, child labor and forced labor.	The LMP was updated prior to appraisal and redisclosed on Sept 10 , 2026. The LMP will thereafter be implemented throughout Project implementation.	PIU
2.2	**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN** a. The Recipient shall ensure that (i) the OHS measures set out in the instruments referred to in section 1.1, are incorporated in procurement documents and included in the contractors/suppliers contracts and that (ii) contractors and suppliers comply with these OHS measures. b. These measures shall apply in accordance with Action 1.1 to the Project's workers as well as to the Project's Suppliers and Contractors, for the execution of construction works and for the management of protected areas, renovation of monitoring stations, tracks, and other works.	a. Same timeframe as Action 1.1 b. During the preparation of procurement documents a & b. These measures shall be implemented throughout the implementation of the Project.	PIU

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	The GRM shall be operational prior to the recruitment of Projects' workers and shall be systematically presented and explained when recruiting the workers. The GRM shall be maintained operational throughout Project implementation.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT PLAN** Prepare and implement a Waste Management Plan (WMP), as part of the ESIAs/ESMPs prepared for the subprojects under the AF, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP as part of the ESIAs/ESMPs, and thereafter implement the WMP throughout Project implementation. Prepare the OP before the start of the Guinea-CTF activities	PIU
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**TRAFFIC AND ROAD SAFETY** Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under Action 1.1 above. The Recipient shall ensure that Project suppliers/contractors implement the traffic plans and road safety measures to comply with the specifications of the ESMF and site-specific ESIA and ESMPs.	Same timeframe as for the preparation and implementation of the ESMP.	PIU
4.2	**COMMUNITY HEALTH AND SAFETY** Assess and manage specific risks and impacts to the community arising from Project activities including behavior of Project workers, use of force and conflicts with rangers, accidents on work sites, response to emergency situations, SEA/SH, etc., and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.3	**SEA AND SH RISKS** The Recipient shall ensure that assessments of SEA/SH risks are included in each of the environmental and social assessments planned for the Project (ESIA for the protected areas) and that measures to manage these risks are included in the ESMP for the OGPNRF / AGEE office building construction works and in the ESMP for the protected areas.	Include SEA/SH prevention and mitigation measures in the ESIAs and ESMP and rangers training plans prior to undertaking works or activities in Protected areas and thereafter implement the measures throughout Project implementation.	PIU/OGPRNF
4.4	**SECURITY MANAGEMENT** The Recipient shall ensure that assessments of the risks related to the interaction between the local communities and the Protected Areas Security Personnel are included in each of the ESIAs planned for the Project (for example for the development and management of the protected areas) and that measures to manage these risks are included in the relevant ESMPs. Moreover, the results of these assessments shall be used in updating the Code of Conduct for rangers working in Protected areas and adjusting their training sessions accordingly. This shall also include the behavior of the security personnel, police and protected areas guards with the local communities after access restrictions to protected areas take effect. Implement the recommendations from OGPNRF Institutional Assessment on its capacity and law enforcement functions and adopt gap filling measures for any gaps identified in the Institutional Assessment in a manner and timeframe acceptable to the Association.	Measures and recommendations shall be adopted before starting activities in all the Protected areas and implemented throughout Project implementation.	PIU/OGPRNF
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	**PROCESS FRAMEWORK (RF)** The Recipient shall update the initial Process Framework to establishes a participatory process through which members of potentially affected communities in the areas of the AF engage in the process, the determination of measures needed to address potential adverse impacts, and the implementation and monitoring of relevant AF project activities. . **RESETTLEMENT ACTION PLANS (RAPs)** It is not anticipated, at this stage, that the Project will require any land acquisition and no permanent or temporary physical displacement is expected. However, it is possible that economic displacement and livelihood losses could occur due to the foreseen restriction to natural resources currently being used by local populations. The Recipient shall prepare, disclose, consult upon, adopt and thereafter implement RAPs including Livelihood Restoration Plans (LRPs) where relevant, to address impacts of potential economic losses due to the access restriction anticipated under the Project. The Recipient shall ensure that the RAPs reflect the Project's SEA/SH sensitive GM to which complaints and feedback on Project relocations can also be directed.	The Process Framework shall be updated, disclosed, consulted upon and adopted 2 months after the AF Effective Date and thereafter implemented throughout Project implementation. Prepare and implement the RAP including an LRP as applicable, prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation at replacement cost has been provided and displaced people have been resettled and moving allowances have been provided. Prior to the start of RAP implementation.	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	**BIODIVERSITY RISKS AND IMPACTS** Prepare and implement Biodiversity Management Measures (BMMs), as part of the ESMP, in accordance with the guidelines of the ESMF and ESIA prepared for the subproject, and consistent with ESS6.	Prepare the BMMs in the same framework as the ESMP and thereafter implement the BMP throughout Project implementation.	PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not Currently relevant.			
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.1	**CULTURAL HERITAGE RISKS AND IMPACTS** 1. Where cultural heritage is identified as part of environmental and social assessment, the Recipient shall ensure relevant subject matter experts are consulted and proportional mitigation measures designed and included in the ESMP and thereafter implemented, consistent with ESS8. 2. A Cultural Heritage Management Plan (CHMP) will be developed for the Fouta Djallon Highlands in coordination with the National Directorate of Cultural and Historical Heritage as part of the UNESCO nomination process	1. Same timeframe as for the ESMPs under action 1.1 above. These management and mitigation procedures shall be systematically included in the Environmental and Social Management Plans (ESMP) and in the tender documents and Project contracts. 2. Timeframe in line with the nomination process	PIU
8.2	**CHANCE FINDS** Describe and implement the chance finds procedures in site specific ESIA/ESMP of the Project. These measures shall be included in the tender documents for the construction works and in the contractors/suppliers contracts.	Same timeframe as for the preparation and implementation of Project site specific ESIA/ESMP.	PIU
ESS 9: FINANCIAL INTERMEDIARIES			
Not currently relevant.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**STAKEHOLDER ENGAGEMENT PLAN** Update and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which includes measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	The SEP was updated, consulted upon and redisclosed on September 10, 2026, and shall thereafter be implemented throughout Project implementation.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	**PROJECT GRIEVANCE MECHANISM** Adopt the National grievance mechanism and update the MOU with ANAFIC, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The National grievance mechanism (GM) shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant GBV holistic and high-quality service providers, all in a safe, confidential, and survivor-centered manner. The National GM shall be supported by a communication plan to ensure that the local populations affected by the Project are aware of the existence of this mechanism and know the procedures for filing and handling complaints and other remedies.	No later than 1 month after the AF Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	PIU
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: A; B; C; E; 1.1; 2.1; 3.1; 4.4; 5.1; 10.1; 10.2			