



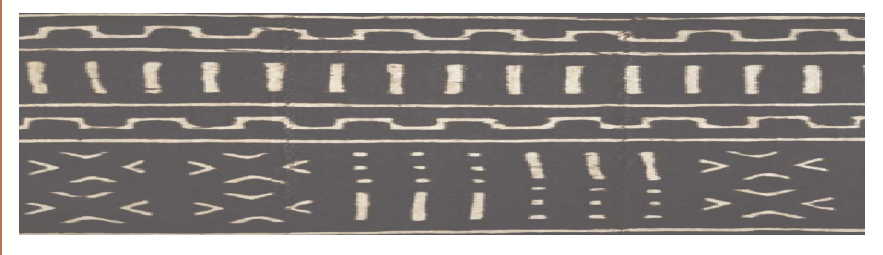
NEWMONT GHANA GOLD LTD.



INDEPENDENT ASSESSMENT
OF RESETTLEMENT
IMPLEMENTATION

AHAFO SOUTH
PROJECT

AUGUST 2005



BRONG AHAFO
REGION
GHANA
WEST AFRICA

NEWMONT GHANA GOLD LTD - AHAFO SOUTH PROJECT
INDEPENDENT ASSESSMENT OF RESETTLEMENT IMPLEMENTATION

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1 INTRODUCTION

1.1 SCOPE OF THE ASSESSMENT

The Ahafo South Gold Mining Project (“the Project”) entails significant displacement impacts. Construction of the Project by Newmont Ghana Gold Ltd (NGGL, “the Company”) has been on-going since April 2004, and compensation and resettlement activities have proceeded to make an inhabited area roughly 3000 hectares in surface available for construction. A draft Resettlement Action Plan has been prepared by planning Alliance of Toronto, Canada, for the Ahafo South Gold Mine Project in Ghana (“the Project”). IFIs, potentially including the International Finance Corporation (IFC) and Equator Principles signatory banks, may consider the Project for funding.

The resettlement implementation was reviewed by Frédéric Giovannetti, an independent resettlement specialist, who stayed in Ghana in this purpose from July 27 to August 3, 2005, under contract with Newmont Mining Corporation (Denver, CO, USA). The review was undertaken based on Terms of Reference (ToRs) jointly prepared by Newmont and the IFC. In summary, ToRs required the reviewer to assess compliance of the resettlement implementation with OD 4.30, the applicable IFC policy on involuntary resettlement, with a particular focus on:

- Adequacy of impact identification,
- Delivery of compensation and resettlement entitlements,
- Livelihood restoration,
- Adequacy of consultation.

The same independent consultant had previously reviewed an initial version of the draft RAP, prepared by planning Alliance and NGGL, and provided comments in May 2005. As mentioned below, this draft RAP is currently being revised by planning Alliance and NGGL, to reflect observations offered by various stakeholders. Mentions of “the draft RAP” in this document refer to the draft version dated March 9, 2005.

The reviewer’s activities during his stay in Ghana (which included 6 days on the Project site in Kenyasi and 1 day in Accra) included the following (see Annex):

- Visits to both resettlement sites of Kenyasi and Ntoroso,
- Visits in the Project footprint, including agricultural farms and housing of residents still living in the Project footprint,
- 10 interviews with affected households, including:
 - Resettlers at both resettlement sites,
 - Relocates (households having opted for cash compensation rather than resettlement),
 - People still living in the Project footprint,
- Interviews with Chiefs,
- Interviews with Government of Ghana organizations dealing with land issues in Sunyani, the regional capital,
- Interviews with resettlement team members,
- Interviews with representatives of OICI, the NGO tasked with implementing the Livelihood Enhancement and Community Empowerment Program (LEEP),
- A meeting with the Moderator of the Resettlement Negotiating Committee,
- Wrap-up meetings with both the resettlement team in Kenyasi and NGGL management in Accra to discuss findings and recommendations.

NGGL provided logistics and facilitation to the reviewer. Meetings and interviews were ably facilitated by Project personnel, who also assisted in translations when needed.

This report focuses on assessing the Project’s performance in implementing resettlement and complying with OD 4.30. It does not include a complete presentation of either the Project or the resettlement and compensation strategy. Readers seeking such a presentation are referred to the Resettlement Action Plan prepared by

planning Alliance consultants on behalf of the Project sponsor. This independent report is intended for public release together with the Resettlement Action Plan.

1.2 SUMMARY PROJECT STATUS

As of July 2005, the number of households eligible to resettlement is about 390, and that of households eligible to relocation is about 292. Resettlement site development and resettlement housing construction are on-going: about 400 plots with houses are planned, and about 60% of this number was available as of July 2005. Actual move to the resettlement sites is on-going at the pace of 5 to 10 households a day. Crop compensation and other cash compensation is almost completed.

Amounts paid to-date (1 August 2005) in cash compensation are presented in the following table:

	Number of households	Amount paid USD
Crop compensation	1581	\$12 755 203
Structure compensation (mainly non residential structures such as pens, wells etc...)	126	\$59 630
Relocation compensation plus mobilization allowance	296	\$920 694
Rental allowance plus mobilization allowance	196	\$90 463
Resettlement compensation	76	\$12 482
		\$13 838 472

The Project, with planning Alliance consultants' assistance, is in the process of finalizing its Resettlement Action Plan for public disclosure according to IFC's disclosure policy, including locally. In addition, the Project is developing a Guide for Land Acquisition and Compensation (GLAC), intended for local dissemination and public disclosure.

2 IMPACT IDENTIFICATION

2.1 IDENTIFICATION OF AFFECTED PEOPLE AND ASSETS

The identification of affected people, affected assets and affected livelihoods generally appears appropriate, and survey and census procedures are sound and well implemented. Misses in surveys have indeed occurred, whether for crops or structures, which can be expected for an exercise of this magnitude, but they are usually fixed through the grievance management system (which is discussed in section 5.2), and missed assets are re-surveyed where needed and compensated once eligibility has been ascertained. Corrupt valuation is also reported by the Project to have occurred, but individuals involved were sacked after investigation of the cases and normal values were re-established.

The issue of the "moratorium" (cut-off date, that was declared, and widely publicized, as of 10 February 2004) has been contentious (people were claiming compensation for crops or structures established after the cut-off date). It however appears now that the principle of the moratorium is accepted by affected people. This has been confirmed by the Moderator of the Resettlement Negotiating Committee.

A specific concern arises in relation with small businesses. The affected area contains some small-scale informal activities, including grain mills, and local alcohol preparation, which is informal and probably illegal but widely tolerated and socially accepted. Mills generally appear to have been compensated; all alcohol preparation activities have not. Whereas compensating such illegal activities may seem debatable in principle, they certainly play a significant role in interested peoples' livelihoods¹. The draft RAP recognizes that businesses might be affected but states that no impact is expected, and that compensation will be negotiated on a case-by-case basis where needed. Immoveables dedicated to businesses (such as mills concrete slabs) are considered as any other immoveable asset by the Project, and are usually compensated in cash. In some cases, the Project has also assisted with the transportation of the business moveable assets (such as the mill machinery).

Recommendation 1:

Company to formalize compensation of impacts to small businesses in the final RAP and in the GLAC currently being finalized. Compensation in cash of each individual affected by the loss of business should be calculated as a function of the loss of income and of the period of time during which the business is actually disrupted before it can be re-established in a new location (resettlement site or relocation site). In practice, notwithstanding compensation of business-related immoveables as per usual Project policies, the Project should prepare for each business identified as affected:

- The identification of people affected by the loss of a business (depending upon situations, this could include owners, operators, and employees),
- An assessment of the business net annual income (gross earnings – operating expenses) should be prepared in consultation with the affected business operator,
- An assessment of the period of time needed to re-establish the business,
- An assessment of expenditures to move the business (unless the company assists with transportation of moveable assets).

2.2 THE FALLOW LAND ISSUE

Land as such is never compensated in cash by the Project. Land legislation of Ghana vests land in the State, in stools, or in families. In the Project district, all rural land is vested in the stools. Families obtain customary ownership for long periods of time, assigned to them by the customary chiefs. Crops and structures are recognized in law as assets held at household level, but land is not. This applies to all land, be it cultivated or fallow. As a result, it is not possible for the Project to compensate fallow land, and this approach is consistent with Ghanaian legislation.

The resettlement package includes replacement of land held in customary ownership. This is a critical aspect of livelihood restoration, as the vast majority of affected people predominantly rely on farming. Affected people are supposed to deal themselves with securing replacement agricultural land, in cooperation with traditional authorities and with Company's assistance. Fallow land compensation should therefore be viewed in the broader perspective of the replacement land issue, which is further developed in Section 4.1 of this report.

It is worth mentioning that none of the affected people met by the reviewer mentioned compensation of fallow land as a specific concern, although most people met are deeply concerned with access to sufficient amounts of agricultural land.

¹ *A related issue is that many people appear to have recently embarked in alcohol preparation as a result of the tree-felling activities undertaken by the mine. The Project resettlement team is therefore reluctant to make alcohol preparation eligible to compensation, as it could be difficult in practice to distinguish "genuine" and well-established businesses from those established after the cut-off date.*

2.3 VULNERABLE PEOPLE

The Project draft RAP identifies four households as vulnerable in the sense of OD 4.30. The draft RAP also rightly states that social coping mechanisms exist in the area, with destitute individuals or households usually taken care of by the extended family. It is the reviewer's opinion that this is largely true in a stable situation, but that the resettlement process could also negatively affect these social links in some cases, and exacerbate vulnerability.

The household interviews carried out by the reviewer gave an opportunity to observe two cases that could illustrate such situations:

- An elderly man living alone, who resettled in Ntoroso resettlement site; he is not a native of the area; he was a sharecropper, which means that crop compensation was received by his landlord, although he did receive a modest share of it (about USD 1,000, half of which he sent to his wife and children); this man now has no farming land left (he states that his crop compensation was too small to allow him to pay the fees requested by traditional authorities to secure alternative land²); as he received a two-room house, he will be able to rent one of the rooms at about USD 10 per month, which appears to be his main source of livelihood in the near future;
- A woman still living in the mine footprint; she was co-owning the house where her husband and her were living; as a result, they had to choose relocation rather than resettlement, so that the compensation could be shared with the other co-owners; her share of the compensation was in the order of USD 400, which is insufficient to secure a replacement residential plot and build a structure on it.

These people appear to be made vulnerable by the displacement process, whereas they were in a stable situation before and could cater for their needs. It may happen that they end up being taken care of by the community. OD 4.30 compels the Company though to take responsibility for identifying such people, and to mitigate the specific impacts of the displacement that they experience.

Recommendation 2:

Company to take the opportunity of the current revision and finalization of the RAP to improve and strengthen its vulnerable people policy. It is recommended:

- to develop household vulnerability criteria, which could be based on a combination of the following:
 - o Landlessness,
 - o Old age, Disabilities,
 - o Amount received in cash compensation,
- to involve the community (the selection of the right consultation mechanism to achieve that needs to be given adequate consideration) in developing these criteria,
- to identify vulnerable people by application of the above criteria, including both resettlers and relocatees, and to involve the community in this identification exercise,
- to devise support measures, which could include, amongst others:
 - o Provision of poultry / sheep, and related training,
 - o Provision of garden plots, of seeds and small tools, and of related training,
 - o Only where needed, food assistance,
- to devise vulnerable people monitoring measures, within the general monitoring framework.

² *He could in theory access land under a sharecropping arrangement at no fee, but he is probably too old to be assessed as a potentially valuable sharecropper by a landlord.*

3 DELIVERY OF ENTITLEMENTS

3.1 CASH COMPENSATION

Cash compensation was due for lost crops, lost structures, temporary renting of dwellings and moving. All of these appear to have been paid as per entitlements and in general conformance with rates and eligibility criteria stated in the RAP. Several household heads met by the reviewer complained that, although they had received their compensation before the actual vacation of land, the period of time between the count of crops and the actual payment was much too long, and the Project has confirmed that this period was routinely in the range from 4 to 6 months. This delay in payment may have encouraged some affected people to plant crops in areas already surveyed, which has then proved contentious for the Project to resolve as a number of people claimed compensation for these “post-moratorium” crops arguing that they had not been paid for the “pre-moratorium” crops.

Crop compensation rates were updated (for the second time) in early 2005 by a committee specifically established in this purpose and which appears to achieve a broad representation of interested stakeholders, including affected people. Affected people appear to be usually aware of, and satisfied with, this process.

Payments are effected through a local bank, and payment procedures have never been mentioned as an issue by affected households interviewed by the reviewer.

Money management courses that were organized and delivered by OICI are a significant additional benefit to affected people. Those interviewees who had attended the courses unanimously found them useful.

3.2 RESETTLEMENT

3.2.1 Site lay-out and public infrastructure

Two sites have been developed, one at Ntotoroso at the North end of the mining area, and the other one at Kenyasi 2. Both sites are at acceptable walking distance from the centres of these towns, and are served on a regular basis by minibuses and taxis. All residential plots are served by a motorable dirt road. The street lighting and power supply and distribution systems could not be assessed as they were not complete at the time of the review. Resettlers will be able to subscribe to a private connection from the power utility company (the VRA). In spite of numerous claims to this effect from the resettlers, the Company has decided not to pay for the initial fee required to obtain the connection and the meter. This approach is supported by the reviewer, as otherwise there would be a significant risk of unpaid electricity bills and of arrears that may become unbearable to the resettlers.

The water schemes were not functional at the time of the visit (resettlers were served by water tankers), but the design and service levels appear adequate. The type of distribution provided (public stand-taps) will require resettlers to organize themselves, to deal with issues such as attending to the taps, revenue collection, and sanitation.

Recommendation 3:

Company to assist resettlers in putting in place a Water and Sanitation Committee, following rules and procedures established by the Community Water and Sanitation Agency of Ghana. Company to train tap caretakers, and WatSan Committee members.

Active erosion was observed in some areas of both resettlement sites, in relation with significant slopes. Resettlers are complaining about run-off water flowing disorderly into their plots. At this point in time, this is certainly in relation with on-going work, including earthmoving, and resulting bare soils. Adequate erosion mitigation and control measures were also observed to have been taken, including adequately sized drains, pavement of sensitive areas, vegetal sediment traps, top-soil reclamation and revegetation. This is however an

area of concern, given the heavy rains and high soil sensitivity to erosion. Erosion will need to be monitored on a regular basis during the next few rainy seasons, and its consequences mitigated if need be.

Recommendation 4:

Company to monitor erosion on the resettlement sites during the next rainy seasons, strengthen erosion control measures if needed, and mitigate the impacts of erosion (check drains for clogging, check structures for potential damage)

The reviewer observes that privacy may become an issue when more households settle in the resettlement sites, although none of the affected households interviewed complained about that. Plots are not fenced, and houses are quite close to one another. Latrines are highly visible. Most people had no fence around their previous residence, and only those few households who had such fences were compensated for them. However, the general arrangement of houses in the original villages, far from the regular pattern that characterizes the resettlement sites, allowed for some privacy.

The primary school intended for Ntotoroso resettlement site is virtually completed, and can be operational when the school year resumes on September 12, 2005. The construction of the Kenyasi 2 resettlement site primary school appears to be behind schedule, and it is unclear whether the contractor in charge will be able to complete it by the same date.

Recommendation 5:

Company to make sure that the contractor in charge of construction of the school at Kenyasi 2 resettlement site will be able to complete the building by September 12, 2005.

3.2.2 House design and construction quality

House design and construction quality appear overall adequate. The Company policy to replace houses on a “area for area” basis rather than on a “room for room” basis is understood but not always accepted, and some people complain about their “lost room”³. The bathroom and ventilated pit latrine are a significant benefit, as none of these facilities existed in the previous situation. Not all people interviewed were fully aware of bathroom and latrine maintenance requirements.

One issue that was repeatedly mentioned by interviewees concerns the shape of the verandas around the houses (refer to photograph plate). People complain that these verandas are too small, and also that they do not protect the house from run-off water as they do not surround the whole front of the house.

Houses are currently covered by a 6-month defect liability, which compels the construction contractor to fix defects unless these have their origin in misuse by the residents. Resettlers have to sign on this clause when they receive the keys of their house. The guarantee is well explained to them, and it was observed that all resettlers met were aware of its details. Resettlers have however indicated that when they verbally report defects to contractors (problems with locks, doors or windows which do not open, leaking roofs), they tend to experience delays in having these problems fixed by contractors.

³ *Minimum room area standards were used in compliance with applicable Ghanaian standards, such that, for example, a 500 sq.ft, 4 room traditional house would be replaced by a 500 sq.ft, 3 room resettlement house.*

Recommendation 6:

Company to pro-actively identify and inventory petty defects in resettlement houses and get Contractors to fix them before the guarantee period ends.

There has been a long-lasting debate in the various consultation forums organized by NGGL about the Company policy to provide kitchens only to those households who had a kitchen in the previous situation. The issue is complicated by the fact that people are reported to have shared kitchens in their original location, with the implication that only one household was then eligible to kitchen replacement, and the other users remaining without a kitchen in their resettlement home. Also, several households having received kitchens were observed to use them as additional bedrooms. It is the reviewer's opinion that it would actually be difficult for the Company to build the sort of makeshift sheds that people use as kitchens, and it is certainly preferable for resettlers to use materials they salvaged from their old houses.

3.2.3 Land titles in the resettlement sites

Resettlers will obtain a 99-year lease deed from the State for the plot they occupy in the resettlement sites. This is a significant benefit. For instance, it will ease the access of resettlers to credit as it could be used as collateral. The Lands Commission in Sunyani takes care of the issuance of these deeds. A first batch of dossiers has been prepared by NGGL for review by the Lands Commission. The process is free-of-charge to the resettlers, as all related expenses will be covered by NGGL. Resettlers will then have to pay a rent to the Office of the Administrator of Stool Lands, in the order of about 30,000 to 40,000 Cedis per year (about USD 3.5 to 4.5). This rent is payable in Kenyasi 2, where the Office of the Administrator of Stool Lands has a local office.

4 LIVELIHOOD RESTORATION**4.1 REPLACEMENT LAND**

Securing replacement land appears to be a significant issue for people not native to the area, less so for people native to the area. Some of the interviewees have indeed been found to remain without a sustainable source of livelihood, particularly without land, and the principle stated in the draft RAP that replacement land would be allocated by traditional authorities does not seem to work for all categories of affected persons, particularly those who are not native of the area. As yet, the Company has not taken pro-active steps to facilitate the land reallocation process, and is concerned that measures taken now to reallocate land within the mining area might be wrongly perceived as an encouragement not to vacate land, which is certainly a valid point. It also seems that some resettlers have not been very active in attempting to secure replacement land, which may be a consequence of them having received cash compensation for crops and living on it for now.

It is the reviewer's opinion however that measures need to be taken shortly in this respect to avoid any hardship for certain categories of affected people, particularly those who were cultivating in the mining area under caretaking or sharecropping arrangements, who are usually not native to the area.

The land replacement strategy outlined in the draft RAP (section 6.3.2) is certainly the right answer. It needs to be resolutely implemented by the company now. This strategy includes:

- Facilitate the grouping of farmers,
- Group farmers under a village traditional leader so that these leaders, together with the farmers seeking land, would approach their respective traditional authorities to present their needs for land,
- Assist in land allocation by the traditional authorities to these farmers by negotiating and providing a facilitation fee to the traditional authorities,

- Designate areas of the Project Footprint and the mining lease that will not be used immediately for Project-related activities, and allocate this land in cooperation with groups of farmers and traditional authorities as soon as all previously used land is vacated,
- Maintain and expand as required the existing monitoring of impacted farmers.

Replacement of land can be based on several different arrangements for people to access land. According to Government officers involved in land management met by the reviewer in Sunyani, the regional capital, the following customary arrangements are available for allocation of agricultural land by traditional chiefs and customary landlords:

- a mid-term⁴ lease, which requires a down-payment to the landlord, the amount of which is essentially a function of the acreage of the plot and the duration of the lease,
- sharecropping, with at least two variations:
 - “Ebunu”, whereby the landlord brings the land and prepares it (tree felling, clearing, plantation) and the sharecropper takes care of further cultivation works, with the sharecropper receiving 50% of the crop;
 - “Ebusa”, whereby the landlord brings only the land while the sharecropper takes care of the land development prior to plantation, plants it and cultivates it; the sharecropper receives two-thirds of the harvest;
 - It seems that other arrangements also exist allowing the sharecropper to gain ownership of a share of the land after a certain period of time;
- Caretaking, which generally seems more precarious.

The land replacement strategy outlined in the draft RAP needs to take account of these different arrangements, which it is recommended to review with the traditional chiefs and groups of farmers in order to identify the right formulas for each category of land and each category of farmers.

Recommendation 7:

Company to take steps shortly to implement the land replacement strategy outlined in the draft RAP (described above), including the following:

- Refresh consultation of traditional chiefs on this particular issue, reassess the practicability of the draft RAP strategy (particularly modalities related with the “facilitation fee” mentioned in the draft RAP), and fine-tune it accordingly,
- Create the land bank mentioned in the draft RAP, in cooperation with chiefs, including land inside the mining area that will not be used immediately, and any available land identified outside the mining area close to the resettlement sites,
- Expand the existing household database to monitor the progress of securing replacement land on a household by household basis,
- Reflect this priority in resources, and consider dedicating one senior officer to this task full time, potentially through a transfer from the crop compensation team that may become less busy in the near future, with appropriate support from the database team

4.2 SMALL BUSINESS SUPPORT AND ACCESS TO CREDIT

NGO OICI has been hired by Newmont to implement a Livelihood Enhancement and Community Empowerment Programme (LEEP). This programme includes training sessions intended for affected people in fields such as dyeing, soap making, mushroom farming, grasscutter rearing, and others. Those people met who had attended the courses are generally satisfied by their curriculum. However, none of the people having attended has actually started a business in any of these fields. One of the reasons identified is that there is hardly any possibility for them to access credit. The implementation of a micro-credit scheme in the area is

⁴ 5 years or more.

actually planned in the LEEP, but no funding has been sourced for it yet. It is the reviewer's opinion that NGGL should fund this scheme. Proposals should be requested from competent Micro-Finance Institutions active in Ghana, including, but not limited to, OICI. The funding required is probably in the order of USD 150,000 (establishment cost + initial revolving line), and could come in part from the selected MFI if it has such capacity, and depending on the assessment MFIs will make of the potential profitability of the scheme. Micro-credit should target affected people as a priority (this should be a condition of NGGL's financial involvement), but will need to be expanded to a broader clientele to be sustainable.

Recommendation 8:

Company to prepare and disclose a request for proposals for the development and implementation of a micro-credit scheme, targeting affected people in priority. Company to make funds available for the initial establishment of this micro-credit scheme.

5 CONSULTATION, INFORMATION, GRIEVANCE MANAGEMENT

5.1 CONSULTATION AND INFORMATION

Consultation and information carried out to-date by NGGL was observed to have reached remarkable results, and affected people met displayed with no exception a remarkable level of information on most aspects of the displacement, compensation and resettlement process.

Two points will however need to be given consideration by the Company:

- Resettlers appear to be confused about the allocation of garden plots (what is planned is actually that they will be able to cultivate gardens in their residential plot, whereas some seem to believe that they will be allocated a distinct plot),
- People living close to the water dam appear to have little information on restrictions of access that will result from the dam impoundment (the Company indicates that mitigations are being developed and will shortly be consulted upon with affected people in this particular area).

Representation through the various entities put in place at NGGL's initiative (the Resettlement Negotiating Committee and other specific committees) also seems appropriate. Some resettlers have however indicated that they would prefer to rely on OICI rather than on their community representatives if they had to lodge grievances or make their views known to the Company.

5.2 GRIEVANCE MANAGEMENT

Several avenues are currently available for affected people to lodge grievances verbally:

- NGGL / pA personnel, particularly by coming in the morning at the gate of the Kenyasi 2 office, where a dedicated NGGL personnel deals with grievance logging and orients complainants to the relevant officer;
- Community representatives in the Resettlement Negotiating Committee and other committees;
- Traditional chiefs;
- OICI, which some people tend to trust as they realize it is to some degree independent from NGGL;
- Construction contractors, particularly those tasked with components of the development of the resettlement sites.

The first of these avenues above appears to be effective: grievances are actually logged (a specific sheet has been prepared in this purpose), and they are assigned to the relevant officer or discussed in resettlement team meetings if they are complex. Corrective actions are indeed identified and implemented, which is after all the main objective of running a grievance management system. However, grievances lodged through the other

avenues are neither registered nor tracked, and may even not come to the knowledge of NGGL, which has potential to generate frustration.

In addition, people can write to the Project, and do so. These grievances were found to be adequately logged.

The documentation system attached to grievance management was found to have the following deficiencies:

- Grievances lodged directly to the Project (either in writing or by coming at the gate) are usually registered in an adequate manner; a form is filled when the grievance is opened, and in-writing grievances are registered electronically; however, corrective actions are not adequately tracked;
- There is no indication on the form or the electronic file whether the grievance is still open or can be closed;
- Grievances lodged through other avenues are neither registered, nor tracked.

While the Project grievance management system overall seems to work in an effective manner, these documentation deficiencies need to be fixed.

Recommendation 9:

Company to clarify which avenues are actually available to lodge grievances, and make this known to affected people (contractors should be excluded of grievance management).

Recommendation 10:

Company to improve the documentation related with grievance management, as follows:

- Register all grievances (simple Excel file),
- Introduce an [Open / Closed] status, develop criteria for grievance closure, and monitor the number of open and closed grievances on a monthly basis,
- Document allocation of grievances to staff members and follow up actions,

6 CONCLUSIONS

The implementation of the resettlement is generally compliant with OD 4.30. Some of the complex implementation mechanisms required for an exercise of such a magnitude may have gaps, which the Company should be able to fix through the implementation of the following recommendations:

- Recommendation 1 (develop and implement a small business compensation policy),
- Recommendation 3 (assist in the organization of a WatSan Committee in the resettlement sites),
- Recommendation 4 (monitor erosion and take action where needed),
- Recommendation 5 (complete Kenyasi 2 resettlement site school by September 12, 2005)
- Recommendation 6 (identify petty defects in resettlement houses and get Contractors to fix them before the guarantee period ends),
- Recommendation 9 (clarify avenues available to lodge grievances),
- Recommendation 10 (improve grievance documentation).

In addition to these, three issues are assessed as critical for the long-term success of the resettlement process, and need to be given due consideration by NGGL as soon as possible:

- The vulnerable people policy needs to be revised and strengthened (Recommendation 2),
- NGGL needs to take action to implement the land replacement strategy planned in the draft RAP (Recommendation 7),
- NGGL needs to make micro-credit available to affected people (Recommendation 8).

ANNEX: ACTIVITY LOG

Date	Activity
27/07/2005	Travel from Dakar to Accra
28/07/2005	Travel to Project site, introductions to resettlement team members, meeting with local NGO "Guards of the Earth and Vulnerable", meeting with Kenyase representative of the CHRAJ (Commission on Human Rights and Administrative Justice", meeting with International Finance Corporation representatives
29/07/2005	Meeting with resettlement team at Project headquarters, meeting with a group of resettlers at Kenyasi resettlement site, interview with OICI representatives
30/07/2005	Household interviews in Ntotoroso resettlement site
31/07/2005	Household interviews in Ntotoroso town, Kenyasi resettlement site, Kenyasi town and Kusi and Amwako Krom village
01/08/2005	Desk work, visit to OICI demonstration farm in Ntotoroso, discussion with OICI team members, interviews with a local chief, also a member of the Resettlement Negotiating Committee
02/08/2005	Travel to Sunyani, meetings with Land Valuation Board, Office of the Administrator of Stool Lands, Lands Commission, Town and Country Planning Department. Meeting with Felix Dzubey, head of the valuation team. Wrap-up meeting at Project offices with Project field team
03/08/2005	Travel to Accra, meeting with Mr Owusu Poku, Moderator of the Resettlement Negotiating Committee. Wrap-up meeting with NGGL management