



RESETTLEMENT MANAGEMENT PLAN – Foinda Village

FOINDA VILLAGE, IMPERI CHIEFDOM,
BONTHE DISTRICT- SIERRA LEONE

Revision	Document Control	Date	Amended By
00	Original/draft	February 2018	D. Doherty
01	Updated	September 2018	D. Doherty

Table of Contents

Table of Contents	1
Acronyms.....	3
Glossary	2
Executive Summary.....	4
1 Introduction.....	7
1.1 Historical Background	7
1.2 Rationale for Foinda Relocation	7
2 Background	9
2.1 Company background – SRL & Iluka	9
2.2 SRL Operational Background	9
2.3 Area 1.....	10
2.4 Socio-Economic Context of SRL’s Operational Area	10
3 Project Impacts and Losses	14
3.1 Introduction	14
3.2 Types of Losses and Impacts	14
3.3 Vulnerable People.....	18
Livelihood status.....	18
4 Applicable Administrative Framework	19
4.1 Relevant Policy and Legislation	19
4.2 International Finance Corporation.....	19
4.3 Comparison between Sierra Leone Requirements and IFC Performance Standards.....	20
4.4 SRL Approach.....	21
5 Socio-Economic, Census and Asset Inventory Surveys.....	24
5.1 Introduction	24
5.2 Previous Resettlement-related Studies.....	24
5.3 2017 Foinda Studies	25
5.4 Survey findings.....	30
6 Selection and acquisition of Resettlement Site	43
6.1 Introduction	43
6.2 Historical site selection - Foinda and Madina Villages	43
6.3 Allocation criteria.....	45
6.4 CONSULTATION PROCESS.....	45
6.5 Resettlement site acquisition and tenure security	46
7 Compensation and Entitlement	49
7.1 Overview	49
7.2 Types of Entitlements.....	49
7.3 Parameters for determining entitlements	50
7.4 Paying compensation.....	53

7.5	Replacement housing	53
7.6	Communal Assets	56
7.7	Compensation for loss of business	57
7.8	Crop compensation	57
7.9	Entitlement matrix	59
8	Organizational and implementation structure	63
8.1	Introduction	63
8.2	Resettlement team	63
8.3	Proposed role of Government of Sierra Leone	65
9	Stakeholder engagement and consultation strategy	67
9.1	Introduction	67
9.2	Objectives	67
9.3	Guiding Principles	68
9.4	Managing stakeholders' expectation	68
9.5	Resettlement committees.....	68
9.6	Other communication and engagement tools and methods.....	72
10	Livelihoods support strategy	75
10.1	Introduction	75
10.2	Livelihoods background	75
10.3	Livelihood restoration principles.....	76
10.4	Approaches to livelihood restoration	77
10.5	Community Development Agreement (CDA)	79
10.6	Measuring livelihood success – key performance indicators	79
10.7	Livelihood restoration program closure	80
11	Grievance management	81
11.1	Introduction	81
11.2	SRL Grievance Mechanism	81
12	Monitoring and evaluation plan.....	84
12.1	Introduction	84
12.2	Monitoring	84
13	Budget and implementation schedule.....	87
13.1	Introduction	87
13.2	Budget and cost	87
14	APPENDICES.....	89
A1	Sierra Leone Legal and Regulatory Framework	90
A2	International Requirements	94
A3	Sample Monitoring & Evaluation Form.....	96
A4	Project Risk Management	99
A5	Records of engagement held to date	102

A6 Sierra Leone Crop Compensation Rates	108
A7 Foinda Relocation – household food transition support analysis	112
SRL Grievance Procedure Documents	113
A8 Public Consultation Report.....	115
A9 Bibliography	121

Acronyms

CBO	Community Based Organisation
CAD	Community Affairs Department
CDA	Community Development Agreement
DM1	Lanti Dry Mine
EPA	Environmental Protection Agency
ESIA	Environmental and Social Impact Assessment
ESHIA	Environmental, Social and Health Impact Assessment
ESHMP	Environmental, Social and Health Management Plan
FGD	Focus Group Discussion
FM	Foinda Medina
GoSL	Government of Sierra Leone
ICMM	International Council on Mining and Metals
IFC	International Finance Corporation
LRP	Livelihoods Restoration Plan
M&E	Monitoring & Evaluation
MDAs	Ministries, Departments and Agencies
MAFFS	The Ministry of Agriculture, Forestry and Food Security
NGO	Non-Government Organisation
NMA	The National Minerals Agency
PAP	Project Affected Person
PAH	Project Affected Household
PC	Paramount Chief
PS	Performance Standard(s)
Q	Quarter
RAP	Resettlement Action Plan
RMP	Resettlement Management Plan
RPF	Resettlement Policy Framework
SDG	Sustainable Development Goal
SDIIP	Skills Development for Income Improvement Program
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SRL	Sierra Rutile Limited
TPH	Tonnes Per Hour
UN	United Nations
VSL	Village Savings and Loan

Glossary

Term	Definition
Asset Inventory	A list of lost and affected assets at the household, enterprise, and community levels
Community Development Agreement	A document prepared by a mining company and host communities in pursuant to Section 140 of the Sierra Leone Mines and Minerals Act 2009. The aim is to enhance the general welfare and quality of life of host communities.
Census	A census that enumerates the affected people and registers them and their details according to location
Compensation	Payment in cash or in kind for an asset or a resource that is acquired or affected by a project
Cut-off date	The cut-off date establishes a moratorium on settling, building or making improvements on affected land and/or structures. Persons occupying the project area after the cut-off date are not eligible for compensation and/or resettlement assistance. Fixed assets (e.g. built structures, crops, fruit trees, and wood lots) established after the cut-off date will not be compensated
Economic Displacement	Loss of income streams or means of livelihood resulting from land acquisition or obstructed access to resources (land, water, or forest) for a project or its associated facilities.
Family Land	This refers to land owned by a family and administered by the family head under customary law. It includes land for farming and/or dwelling.
Host community	Any community receiving displaced persons; includes people living in or around areas to which people physically displaced by a project will be resettled who, in turn, may be affected by the resettlement.
Household	A person or group of people who normally live together, share the same pot and recognize someone who is head of such unit.
International Finance Corporation	The International Finance Corporation (IFC), the private-sector lending arm of the World Bank provides investment, advisory, and asset-management services to encourage private-sector development in developing countries.
Involuntary resettlement	Involuntary resettlement occurs without the informed consent of the displaced persons or if they give their consent without having the power to refuse resettlement. Resettlement is involuntary when those affected cannot refuse, because expropriation could occur, even if those displaced willingly agree to compensation.
Land acquisition	Includes both outright purchases of property and acquisition of access rights, such as easements or rights of way
Land expropriation	The taking of private property by a public authority for public use or in the public interest
Livelihood	The full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering.
Livelihood restoration	The provision of opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living to economically displaced persons whose livelihoods or income levels have been/will be adversely affected.
Livelihood	A plan detailing the measures to be used to improve or restore the livelihoods of people

Term	Definition
Restoration Plan	experiencing economic displacement
Market value	The value required to allow Affected Communities and persons to replace lost assets with assets of similar value.
Physical displacement	Loss of shelter and assets resulting from the acquisition of land associated with a project that requires the affected person(s) to move to another location.
Project Affected Household	All members of a household, whether related or not, operating as a single economic unit, who are affected by a project.
Project affected person	Any person who, as a result of the implementation of a project loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Project Affected Household	All members of a household, whether related or not, operating as a single economic unit, who are affected by a project.
Public Land	This category of land is reserved strictly for land managed by MDAs of the government, and in some cases by traditional authorities in trust for the people and openly used or accessible to the public at large.
Replacement cost	The market value of the assets plus transaction costs, plus the cost of preparation to levels similar to, or better than, those of the originally affected asset. Depreciation cost of structures should not be taken into account.
Resettlement Assistance	Support provided to people who are physically displaced by a project. Assistance may include transportation, food, shelter, and social services that are provided to affected people during their relocation. It may also include cash allowances that compensate affected people for the inconvenience associated with resettlement and defray the expenses of a transition to a new locale, such as moving expenses and lost work days.
Resettlement Management Plan	Document outlining the specific context, objectives, measures, timing and costing for achieving a project-related resettlement.
Resettlement Policy Framework	Document providing the broad principles to guide the development of project-specific resettlement.
Security of tenure	Resettled individuals or communities are resettled to a site that they can legally occupy and where they are protected from the risk of eviction.
Stakeholders	Individuals, groups, organisations and institutions with interest or influence in a Project.
Tenant	A person who lives in a structure belonging to another regardless of whether they pays rent or not.
Vulnerable people	People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Executive Summary

This document represents the Resettlement Management Plan (RMP) for Foinda village prepared by Sierra Rutile Limited (SRL). It defines the approach and work program to relocate the residents of Foinda Village and restore any displaced livelihoods.

Foinda is located in the Imperri Chiefdom, within the Bonthe District in Southern Sierra Leone. From the socio-economic and census data collected by SRL in November 2017, it has a population of 822 people in 167 households. The total area of land owned by Foinda village is 917 hectares (2,266 acres). A previous attempt to relocate Foinda was made in 1994, however due to the civil war in Sierra Leone the project was interrupted and Foinda was not moved. The renewed initiative to relocate the village, the 'Foinda resettlement project', is currently underway, having commenced in November 2017, with a cut-off date established as the 10th November 2017.

The resettlement is being undertaken in full accordance with applicable Sierra Leonean regulatory requirements and the policies and procedures of Iluka Resources (Iluka). SRL resettlement practices, as detailed in the SRL Resettlement Policy Framework (RPF), are aligned with the International Finance Corporation's (IFC) Performance Standard 5 - Land Acquisition and Involuntary Resettlement.

A Socio-economic Study and a Census and Asset Survey was conducted by SRL in November 2017 to inform this RMP. The data collected and analysed will underpin planning and preparation of compensation and entitlements, as well as livelihood restoration interventions and monitoring activities. SRL's preferred standard for compensation for loss of assets will be replacement of asset with asset. However, there will be consideration for cash compensation as detailed in the entitlements section of this RMP. The assets identified are, homestead structures and other fixed property that comprises residential structures; non-residential moveable structures (include goat and chicken sheds) and non-residential immovable structures; land; crops and trees; graves and sacred sites; community infrastructure such as school, water wells; businesses and enterprises; grazing land and natural resources.

SRL's principle and strategy for crop compensation as part of the Foinda relocation project is based on fairness and timely payment of compensation. SRL will ensure that land take is minimized to allow farmers to continue to livelihood activities with minimal disruption, whereby,

- any crops/economic trees disturbed for the purposes of land acquisition will be compensated for in accordance with the rates and required processes set by the Ministry of Agriculture and Food Security(MAFFS) and all SRL Policies.
- undisturbed land, farm plots and 'bushes' that can be accessed safely, without interference to SRL's operation and within reasonable distance for farmers will not be destroyed and compensated for and access and use will be ongoing for these landowners.

Table I. FOINDA VILLAGE PROFILE

FOINDA VILLAGE PROFILE		Total Village Land Area		
Foinda Village was established around 1890 Chiefdoms: Imperi Chiefdom, Bonthe District DistrictChiefdom: Imperi Chiefdom, Bonthe District		Total land (both within and outside IMU buffer limit)	67 hectares	
		Existing settlement land area	5.3 hectares	
		Total land area owned by Foinda	917 hectares (2,266 acres)	
Demography	Population: 822 ; under 1yr = 21; 1-5yrs=136; 6-10yrs=149; 11-16yrs=136; 17-35yrs (youth age in Sierra Leone)=86; 36-50yrs=63; 51-60yrs=14; above 60yrs=16; Unable to provide age=201			
	Dwelling structures: 114 Households =167			
	Vulnerable People* - Households = 46 Individuals = 62 * People with mental illness, economically disadvantaged, speech impairment, widow, single parent, elderly			
	Ethnicity: Mende: 80% Sherbro: 20% Religion: Muslim: 90%; Christian: 10%			
Land ownership	Landowning families: Five (5); Head of landowning families: Kombo, Gbassa, Gbouma Ansumana and Gondo families			
	Sierra Rutile Limited pays annual surface rent to landowning families for use of their land for company operation			
Leadership structure	One Town Chief (Acting). Reports to the Section Chief – Speaker – Paramount Chief; Deputy Town Chief; Societal Heads for men and women; Youth leader, Women's' leader			
Livelihood	Number in formal employment	15 (3 teachers, 12 SRL employees)		
	Village food crop*	Rice, Cassava, potato, plantain, Cocoyam, Bean, Maize (corn), Bennie, Millet,Sorghum, Pumpkin and Chinese Yam		
	Village cash crops*	Mango, Oil palm, Coffee, Coconut, Kola nut, pawpaw, Breadfruit, Guava, Pear		
	Other village income sources	Agriculture, Hunting and Petty trading		
	Products from forest*	Firewood, Fruit, Animal, Snail, Medicinal Plants		
	Hunting species*	Cutting grass (cane rat), Squirrel, Porcupine		
	Food security	Adequate land but shortage of food; crops are mainly planted for crop compensation		
	Main household costs	Food, Medical, Clothing, School, Secret societies activities and Transport		
	Engaged in animal husbandry	73 households mainly on chicken, goat, dusk and sheep		
Health	Main health issues (order of importance): Malaria, stomach ache, diarrhea, fever, Heart disease, toothache, Arthritis			
Community Infrastructure	Means of transport: Motor bike (Okada)			
	Church: Meet in a dwelling house Mosque: One (1) School: One (1) Primary School	No community market Nearest market: Moriba Town (25km), Gbangbatoke (37km)	Nearest health facility: Gbangbama (5.5km) or Junctionla (6km)	No secondary school Nearest secondary school: Gbangbama (5.5km)
	Light/electricity source: Battery-powered light, lanterns, portable solar light		Communication: Mobile phone own by few (two networks)	
	Water source: two (2) wells (non- functional), two (2) x ten thousand litre tanks (functional, use seasonally); an almost dried out stream (used for domestic purpose)		Sanitation: only two VIP functional latrines; use open spaces close to and in nearby bushes	
Educational attainment and status	Those In School	45%	No Formal Education	15.5%
	Not of School Age	11.5%	Completed Primary School	11.3%
	Quaranic Education	8%	Attained WASCE	5%
	Other Training	2.4%	Tec/Voc Training Graduate	1.1%

The layout of the document is as follows:

Chapter 1 introduces the document, providing historical background and the rationale for the revised Foinda Resettlement Project.

Chapter 2 provides background information on Iluka and SRL and the operational profile of SRL, particularly as it is applicable to the area where Foinda village is located.

Chapter 3 identifies impacts and losses that led to the economic and physical displacement of project-affected people. It defines the impacts identified and anticipated, with plans to mitigate them.

Chapter 4 identifies the legal framework and policies to land acquisition and involuntary resettlement. It outlines both domestic and international legislation and standards. Gaps between the two are highlighted and SRL's Resettlement and Livelihood Restoration Principles are presented.

Chapter 5 describes the process and methodology used to undertake the socio-economic, census and asset inventory studies and summaries the findings from these studies.

Chapter 6 details the process undertaken to selecting an appropriate resettlement site for Foinda. The proposed new settlement layout and house designs are presented.

Chapter 7 details the compensation and entitlements framework that is being developed through consultation and negotiation with the communities and other key stakeholders. It provides details of the resettlement infrastructure, plots, relocation and compensation packages and the procedures and guidelines to be followed for the project.

Chapter 8 defines the organisational and implementation structure responsible for the planning and implementation of the Foinda Resettlement Project.

Chapter 9 outlines the approach to stakeholder engagement and consultation strategy that SRL will use in relation the Foinda Resettlement Project, to both ensure good relations between the mine and communities and the meaningful participation of all affected people in the relocation process. The resettlement committees established for the project are detailed.

Chapter 10 details SRL's approach to undertaking a Livelihood Restoration and related community development initiatives.

Chapter 11 describes the process to manage grievances in a planned and systematic manner. This is to facilitate the speedy resolution of grievances, promote trust and build a positive rapport between SRL and project stakeholders.

Chapter 12 explains how the Project will conduct monitoring and evaluation to track the implementation Resettlement Management Plan.

Chapter 13 outlines a summary budget and schedule prepared for the implementation of the RMP.

1 Introduction

This RMP is prepared to guide the planning and implementation of the Foinda Resettlement Project.

SRL in compliance with Sierra Leone Environmental Protection (Mines and Minerals) Regulations 2013, developed this Plan, referred to as a “Resettlement Management Plan (RMP)”. Part III and IV of the regulations require the mineral right holder, in this case SRL, to prepare a RMP in cases where there is known or potential involuntary displacement caused by mining activities.

Preparation of a RMP is also required under Sections 33 (1), (2), (3), 34 and, 35 of the Mines and Minerals Act 2009 (MMA 2009). Chapter 3 of this document further discusses Sierra Leone Regulatory Requirements as relevant to Involuntary Resettlement (IR), international standards such as the IFC Performance Standard 5 – Land Acquisition and Involuntary Resettlement (PS5), and SRL’s Resettlement Principles, as specified in the SRL Resettlement Policy Framework (RPF).

The Foinda resettlement process will provide physically and economically displaced people with compensation, including the provision of alternative sites within which they can re-establish or restore their livelihoods. The RMP pulls together various documents, plans, data, strategies, statutory and regulatory instruments, standards and processes that will be used for the planning, implementation and post-implementation activities of this relocation project. For the purpose of this document, the physical and economic relocation of Foinda village will be referred to as the ‘Foinda Resettlement Project’.

1.1 Historical Background

Historically, SRL prepared a Resettlement Action Plan (RAP) in 2001 that specifically presented the plan for the physical and economic relocation of Foinda Village to provide access to the Gbeni deposit. The plan was for Madina Village and Foinda Village to move to same site later known as Foinda-Madina (FM). However, the political upheavals that led to the war in Sierra Leone disrupted the relocation program. Compensation was paid, in part, to some residents and some dwelling structures were constructed. The village of Madina was relocated, but Foinda residents were not.

1.2 Rationale for Foinda Relocation

In line with SRL’s resettlement principles, efforts are made to limit resettlement through exploring alternative project footprints.

Foinda was re-considered for resettlement due to its close proximity to the Gbeni mining pit and the related impacts of this. In addition, more recently, the improved economics of alternative in-pit dry mining techniques have made it economical to mine areas beneath Foinda village. As a result it was determined the Foinda Resettlement Project should recommence in late 2017.

Figure 1.1 Foinda Village



Figure 1 Foinda village

Table 1 Project Timetable

Key Milestone	Timing
Construction work commencement	February 2018
Payment of crop compensation	June 2018
Construction completed	Mid July 2018
Residents move to new village	July/August 2018
Demolition and clearing of land at Foinda	August 2018
Livelihood Restoration Activities	Jan 2018 –Dec 2020

2 Background

2.1 Company background – SRL & Iluka

SRL is a leading mineral sands company, operating world class assets in Southern Sierra Leone. It is a multi-mine operation with one of the largest rutile deposits in the world. The company produces rutile, ilmenite and a smaller quantity of zircon in concentrate.

SRL and Iluka Resources (Iluka) concluded a merger on 08 December 2016. SRL has a long operating history and plays a major role in the national and regional economies, accounting for approximately 2.4 per cent of Sierra Leone's total GDP. With a workforce of more than 1,850 employees (over 95 per cent of which is Sierra Leonean), the company is one of the largest private sector employers in Sierra Leone. The operation consists of one dredge (Lanti Dredge) and two dry mining operations (Lanti Dry Mine and Gangama Dry Mine). The operations feed into one central processing unit where a mineral separation plant separates the heavy mineral concentrate into several distinct rutile products and by-products. Sierra Rutile's operation is completely self-sufficient with a dedicated port facility as well as other supporting infrastructure including a power plant, health clinic and residential camp. At 95 per cent TiO_2 the rutile is one of the highest quality titanium products in the world.

SRL is a wholly owned subsidiary of Iluka Resources Limited (Iluka). Iluka is involved in mineral sands exploration, project development, operations, marketing and rehabilitation. Iluka is the world's largest producer of zircon and a major producer of the high-grade titanium dioxide products - rutile and synthetic rutile. Iluka is listed on the Australian Securities Exchange. Iluka's Group Sustainability is responsible for environment, social, health & safety performance, as well as corporate governance systems. The Company recognises that compliance with legislative requirements is a minimum standard that must be achieved while performing at or beyond legal requirements. In view of this, Iluka is working toward aligning with International Council on Metals and Minerals (ICMM) Sustainability Principles; The International Finance Corporation (IFC) Performance Standards (PS) especially PS5 – Land Acquisition and Involuntary Resettlement; and the relevant statutory instruments of Sierra Leone.

2.2 SRL Operational Background

SRL operates its mine in South Western Sierra Leone, about 135 km from Freetown, the capital city. The mining of rutile reserves commenced in 1967 with operations having been suspended twice for economic and technical reasons in 1971 and 1982 respectively, and in 1995 for security reasons due to the escalation of civil war in the country. The total mining footprint within the Project Area is approximately 29.5 km² (22 952.68 ha), this includes associated infrastructure.

Currently, SRL's primary operations consist of : Lanti mining operations (both dredge and dry mining); processing operations (floating and land based concentrators); Gangama dry mining operation (dry

mining and land based concentrator); Mineral Separation Plant (MSP); and the transport and export of product through the Nitti Port facilities. In addition, the mine maintains an extensive network of ponds and has power generation facilities, accommodation, offices, clinic and roads.

2.3 Area 1

The current operational activities of SRL occur in the mining lease referred to as Area 1. The total footprint of mining activities in Area 1, including associated infrastructure, covers approximately 29.5 km² (22 952.68 ha). The Area 1 lease straddles the Imperi and Jong chiefdoms in the Bonthe District, and the Upper Banta, Lower Banta and Bagruwa chiefdoms in the Moyamba District.

The Mines and Mineral Act 2009, Section 34. A., require SRL as a holder of a large scale mining licence, ‘....shall be subject to surface rent which shall be distributed as follows: (a) Land owners 50% (b) District Council 15% (c) Paramount Chiefs 15% (d) Chiefdom Administration 10% (e) Constituency Development Fund 10%. Foinda landowners are subject to this payment and this will continue post-relocation as long as SRL continue to use said land.

The SRL mining operation has an existing Environmental Licence (reference number EPASL030) for Area 1. Two Environmental and Social Impact Assessment (ESIA) studies were previously undertaken; one in 2001, followed by an update in 2012. Since 2012, SRL has expanded its dry mining activities in Area 1, and plans to further expand its current dry mining operations with continuation of its dredge mining activities.

SRK Consulting (South Africa) (Pty) Ltd was appointed by SRL in 2016, to undertake an Environmental, Social and Health Impact Assessment (ESHIA) and develop an Environmental, Social and Health Management Plan (ESHMP) for Area 1

2.4 Socio-Economic Context of SRL’s Operational Area

Sierra Leone is located in the West Coast of West Africa and recorded a total population of just over 7 million people. The 2015 Population and Housing Census (PHC) reported that this comprises a household population of 7,076,119, and an institutional population of 15,994. By type of residence, the 2015 PHC reveals that 4,187,016 people live in the rural areas (59 per cent), and 2,905,097 people live in the urban areas (41 per cent).

At the district level, the population figures are as follows:

- Eastern Region: Kailahun – 526,379; Kenema – 609,891 and Kono – 506,100.
- Northern Region: Bombali – 606,544; Kambia – 345,474; Koinadugu – 409,372; Port Loko – 615,376 and Tonkolili – 531,435.
- Southern Region: Bo – 575,478; Bonthe – 200,781; Moyamba – 318,588 and Pujehun – 346,461.
- Western Area: Western Area Rural – 444,270 and Western Area Urban – 1,055,964.

- The Southern Region of Sierra Leone as we can see from the data above, is the least populated of all the regions of the country.

Referencing the SRL ESHIA Report 2018, it is estimated that a total of 4,000 households reside within SR Area 1. The household survey (HHS) recorded 2,960 household members in 560 households in total, resulting in an average household size of 5.2 persons per household.

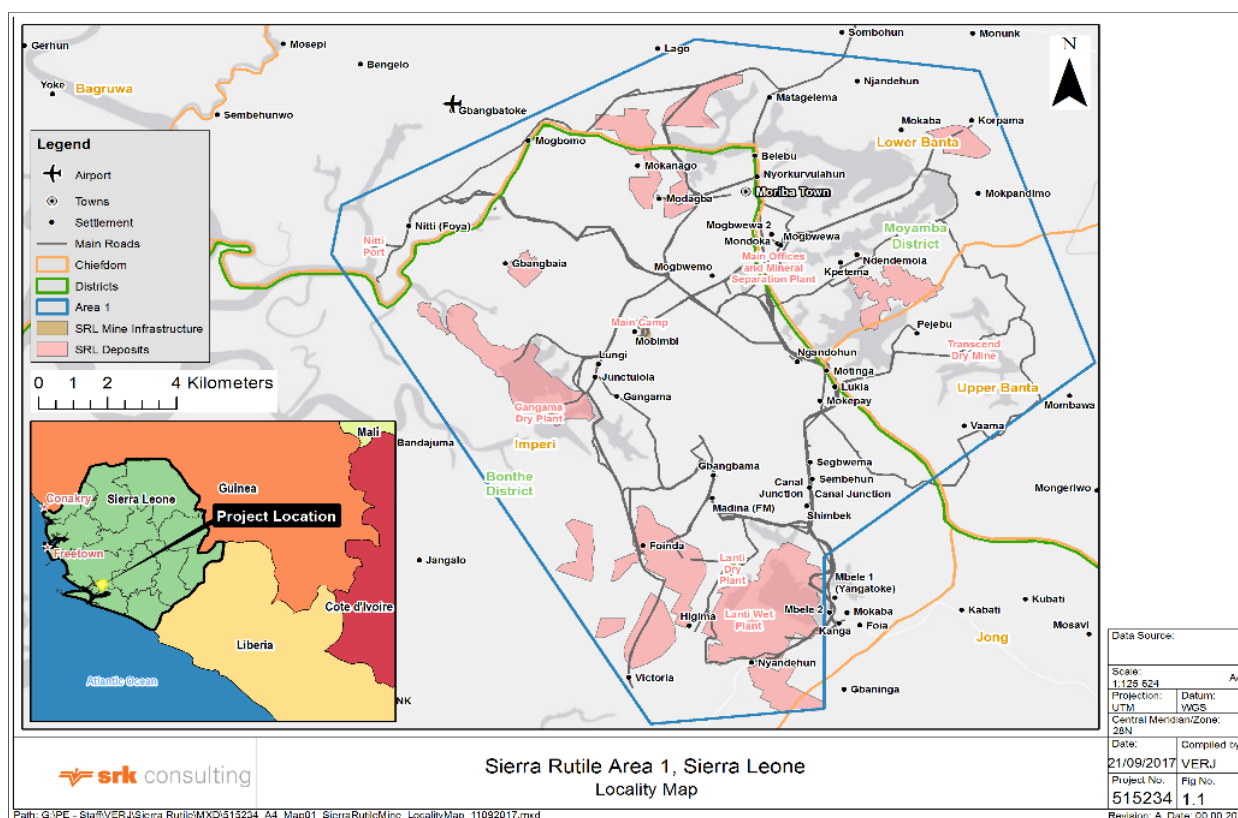


Figure 5.1: Geographical location

Source: SRK Social Impact Assessment (Draft) 2017

Table 5.1: Bonthe & Imperri population data

		2004 Census	2015 Census
Bonthe	District	139,687	200,781
<u>Bendu-Cha</u>	Chiefdom	4,680	7,168
<u>Bonthe Urban</u>	Town	9,740	10,075
<u>Bum</u>	Chiefdom	18,827	24,339
<u>Dema</u>	Chiefdom	5,301	7,411
Imperri	Chiefdom	17,576	33,394
<u>Jong</u>	Chiefdom	28,495	33,816
<u>Kpanda Kemo</u>	Chiefdom	7,661	10,438
<u>Kwamebai Krim</u>	Chiefdom	7,715	14,289
<u>Nongoba Bullom</u>	Chiefdom	13,617	20,060
<u>Sittia</u>	Chiefdom	13,449	21,347
<u>Sogbeni</u>	Chiefdom	7,853	10,863
<u>Yawbeko</u>	Chiefdom	4,773	7,581
Sierra Leone	Republic	4,976,871	7,092,113

Source: Statistics Sierra Leone (web)

2.4.1 Local governance structure

Foinda is located within the Bonthe District, one of eleven districts of Sierra Leone. The district is governed by a district council called the Bonthe district Council, headed by a Chairman who is elected on a four-year term. The Council has devolved authority from the central government under the Local Council Act 2004.

The Paramount Chief of Imperi Chiefdom hosting Foinda, is the primary traditional representative of his or her chiefdom to outsiders having any dealings with the chiefdom, including nongovernmental organizations (NGOs) and other development agents, government representatives, politicians, and mining companies and other commercial interests. He or she is the custodian of all land as stated in the Sierra Leone Chieftaincy Act 2004. It is essentially impossible to do anything in a chiefdom without the knowledge and approval of the Paramount Chief. Most chiefdom resources also fall under the authority of the Paramount Chief, though it is the Chiefdom Treasury Clerk who actually keeps all chiefdom accounts. The Paramount Chief also fulfills traditional and ceremonial tasks, particularly in relation to the secret societies. The female Paramount Chief of Imperi Chiefdom is automatically the head of the women's secret society.

Paramount Chiefs rule through a network of sub-chiefs known as Section Chiefs and Town Chiefs supported by a Chiefdom Speaker. The Chiefdom Speaker is the deputy to the Paramount Chief and has ceremonial authority within the chiefdom. He is the head of all male secret societies in Imperi Chiefdom.

Each chiefdom is divided into anywhere between five and 15 sections, and town or village level. These functionaries are somewhat less formally mandated than the Paramount Chief, though many are recognized by legislation and all are considered official representatives from the perspective of

local communities. Foinda is part of the Bigo Section within Imperi Chiefdom. Since early 2017, Foinda has been led by an acting Town Chief, supported by his deputy. The Acting Town Chief has authority to manage the affairs of the village in consultation with the Section and Paramount Chiefs. This Town Chief acts as the Chairperson of the Foinda Village Resettlement Committee.

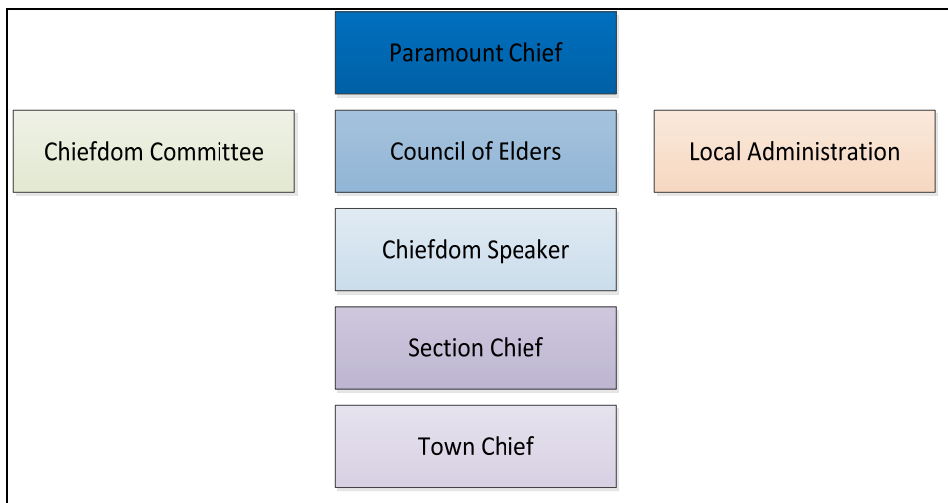


Figure 5.2: Local leadership structure

In accordance with the Local Government Act 2004, the local district council is the highest political authority in the district and has devolved legislative and executive powers to be exercised in accordance with this Act. The district council is responsible generally for promoting development locally, and promote the welfare of its residents.

3 Project Impacts and Losses

3.1 Introduction

This Chapter describe some of the losses and impacts, as understood and anticipated by SRL, likely to be experienced due to the economic and physical displacement of Foinda village. This includes specific acknowledgment of the potential for enhanced impacts on vulnerable people. Actions to mitigate or avoid impacts and losses are also detailed.

SRL is committed to ensuring that the losses stated below and there impacts are avoided, or unavoidable, minimized. Section 38 (1, 2) of the Mines and Minerals Act (MMA) 2009 and IFC PS5 require:

“..all owners or lawful occupiers of land to be resettled, as a result of being displaced by a proposed mining operation, be resettled on suitable alternate land, with due regard to their economic well-being and social and cultural value so that their circumstances are similar to or improved when compared to their circumstances before resettlement, and the cost of such resettlement shall be borne by the holder of the mineral right”.

3.2 Types of Losses and Impacts

Losses for each household, enterprise, or community affected by the project were identified in the November 2017 socio-economic, census and asset study. Assets held collectively, such as water sources, forest resources, and community structures were captured separately. Table 3.1 below outline the impacts and losses; mitigating measures planned to address them and relevant people responsible as lead, to execute any intervention.

Agriculture is identified as the most important sector in Foinda, providing livelihood means for approximately 71 per cent of the population. Residents will lose some of their land and farm resulting in economic displacement. SRL will minimise this by ensuring that where possible, after taking into consideration safe access and reasonable distance to their farms, displaced people engaged in farming will still be able to utilise some of their farms uninterrupted.

Table 3.1 Anticipated impacts and proposed mitigation measures

IMPACTS (example potential and current)	MITIGATING MEASURES	BY WHOM	REFERENCE PLAN / DOCUMENT
1. LOSS OF LAND	Provide land of equal or better productive potential	Resettlement Management Unit	Resettlement Policy Framework (RPF)
House plot (owned or occupied)	Displaced persons will be entitled to compensation for lost assets, or to alternative but equivalent forms of assistance in lieu of compensation.		Resettlement Management Plan (RMP)
Security of tenure for land/house lost			
Business premises (owned or occupied)	Where safe and feasible, SRL will allow continued access to undisturbed farmlands.		Livelihood Restoration Plan (LRP)
Access to agricultural and forestland			
Traditional use-rights	Lack of legal rights to the assets lost will not bar displaced persons from entitlement to such compensation or alternative forms of assistance. Where applicable, legal documents will be developed as evidence of ownership		Land Lease Agreements
Community or pasture land			
.	In addition to compensation, livelihood restoration programs will be designed and implemented (see below)		Stakeholder Engagement Plan (SEP)
2. LOSS OF INCOME AND LIVELIHOOD	A detailed Livelihood Restoration Plan is in development. This plan will identify all groups directly or indirectly impacted, together with specific strategies and actions to address and monitor livelihoods impacts.	Resettlement Management Unit -	Resettlement Policy Framework (RPF)
House or living quarters		Livelihood / M&E Officer	Resettlement Management Plan (RMP)
Other physical structures	'Special' support to vulnerable groups will be provided through financial or other kind of tailored assistance.		
Structure used in		Community Affairs Department (CAD)	Livelihood Restoration Plan (LRP)
commercial/industrial activity	Monitoring and evaluation (M&E) of the implementation of the resettlement/ livelihood restoration plans will be tracked to assess progress, identify problems and make changes. M&E will commence midway through the implementation phase and periodically after for at least 3 years.	Community Development Committee	Community Development Agreement (CDA)
Displacement from rented or occupied commercial premises			
Income from rent or share-cropping			
Income from affected business	Livelihood and M&E Officer recruited December 2017.		

IMPACTS (example potential and current)	MITIGATING MEASURES	BY WHOM	REFERENCE PLAN / DOCUMENT
Income from tree or perennial crops Income from forest products Income from grazing land Subsistence from any of these sources Disproportionate impacts on vulnerable groups due to their vulnerable status in their community	An independent Completion Audit will be commissioned by SRL to determine if provisions of the RMP have been met and if any corrective measures are needed to ensure project affected people have been enabled to maintain or improve their livelihoods		Stakeholder Engagement Plan (SEP) Monitoring & Evaluation Plan Completion Audit
3. LOSS OF COMMUNITY ASSETS Loss of Social amenities such as Schools, Other social and communal amenities such as water wells Places of worship (mosque) Cemeteries, burial sites Access to traditional medicines and natural resources Shrines, secret society sites, other religious symbols	Communal assets will be replaced in accordance with the Foinda RMP's Entitlement Matrix Provisions will be made to enable ceremonial rites and other processed to be undertaken, as required, for relocation of graves, shrines, and any sites of cultural significance. SRL has established a grievance mechanism to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons, including a recourse mechanism designed to resolve disputes in an impartial manner.	Resettlement Management Unit CAD Team - Community Manager	Resettlement Policy Framework (RPF) Resettlement Management Plan (RMP) Community Development Agreement (CDA) Stakeholder Engagement Plan (SEP)

4. ADVERSE IMPACT ON ENVIRONMENT	SRL's ESHIA for Area 1 covers Foinda and the associated ESHMP will address these impacts.	EHS Department	Environmental, Social and Health Impact Assessment (ESHIA- Area 1)
Disruption to ecosystem services	SRL has established a grievance mechanism to receive and address in a timely fashion specific concerns about impacts and losses that are raised by displaced persons, including a recourse mechanism designed to resolve disputes in an impartial manner.	CAD Team - Community Manager	
Eg. Biodiversity- loss of specific species; loss of special trees that once provided medicinal or herbal treatment			

3.3 Vulnerable People

Vulnerable people can be defined as people who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be less able to participate fully in the planning process, and/or more adversely affected by land acquisition and the resulting direct and indirect impacts. There are 46 households considered vulnerable or have at least one member who is vulnerable. The total number of project –affected people considered vulnerable in Foinda is 62. See table below outlining various categories and breakdown of vulnerable people. Someone is considered vulnerable if he or she meets one or more of the categorisation as set out in this section below.

A distinction is made between pre-existing vulnerability and project-induced vulnerability. SRL has significantly minimized any instances of project-induced vulnerability. With respect to pre-existing vulnerability, the SRL's goal is to at least have no negative impact on the vulnerable persons, and where possible optimise any potential positive impacts.

Focus group meetings were held with vulnerable people and their needs are being considered on a case-by-case basis. Those already identified as vulnerable were consulted individually and their specific needs identified.

Table 3.2 Categorization of vulnerable people and households

NO	CATEGORIES	SPECIFY
1	Elderly/aged	55 and above
2	Livelihood status	Among least living condition
3	Disability	Sight, speech and visual impairments; Mental illness, autistic spectrum
4	Widow	No spouse –passed away
5	Single parent	with one or more children
7	Terminal, lifelong illness	HIV/AIDs; epilepsy; severe high blood pressure
8	Illegal settlers / squatters	Occupying a house/land illegally
9	Homelessness	No fix abode
10	Gender inequality	Cultural bias against women

4 Applicable Administrative Framework

The focus of this section is to summarise the applicable administrative framework. Where there are any identified gaps between the Sierra Leone legal framework and the IFC Performance Standard 5 an indication of how SRL will address these aspects is specified.

4.1 Relevant Policy and Legislation

Key policy and legislation relevant to managing resettlement in Sierra Leone includes:

- *Constitution of Sierra Leone 1991 (as amended in 2001)*
- *Sierra Leone National Land Policy (2015)*
- *Mines and Minerals Act 2009*
- *Environmental Protection (Mines and Minerals) Regulations 2013*
- *The Sierra Rutile Agreement (Ratification) 2002*

A full description of each of the above policy and legislation as it relates to land acquisition, resettlement and livelihood restoration is contained in Annex A1.

4.2 International Finance Corporation

IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement (IFC, 2006) was developed by the IFC (the private sector lending arm of the World Bank group) and updated in 2012. This standard is applicable to all land acquisition and involuntary resettlement resulting from projects receiving IFC financing. A number of other financial institutions also adopt this standard and it has largely become the default international standard for the mining sector. As outlined in PS5, the overarching objectives are as follows:

- To avoid forced eviction;
- To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs;
- To anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected;
- To improve, or restore, the livelihoods and standards of living of displaced persons; and
- To improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites.

4.3 Comparison between Sierra Leone Requirements and IFC Performance Standards

SRL acknowledges that there are some gaps between Sierra Leonean legislation and PS5. A summary is provided below in Table 5.1. Annexes A1 and A2 provides further details of Sierra Leonean regulatory instruments and International requirements. SRLs Resettlement Management Unit maintains full records of all applicable Sierra Leonean regulatory requirements pertaining to resettlement.

Table 4.1 Summary comparison between Sierra Leone Requirements and IFC PS5

Topic	SL Laws /Relevant Conventions	IFC PS 5	SRL Approach
Eligibility	Varied definitions	All occupants, regardless of the legal status under which they occupy land, and including both “physically-displaced” and “economically-displaced”	All occupants that occupy land (at the time of the cut-off date) regardless of their legal status
Cut-off date	Yes	If not provided by host Government legislation, should be established by Project and widely disseminated	A cut-off date will be established for all projects
Forced eviction	Acceptable by GoSL as last resort for national benefit	Avoid	SRL will seek to avoid forced evictions
Squatters	Not required	Support/compensation required	SRL will provide compensation and support where required in accordance with the Entitlement Matrix
RAP preparation	Required in the form of a “Resettlement Management Plan”	Yes	An RMP and/or RAP will be prepared for all projects that physically displace people.
Livelihoods Restoration	Implied: “develop measures to avoid, mitigate or compensate any social or economic impacts”	Required	To be provided for all economic displacement and detailed in a Livelihoods Restoration Plan.
Cash and in-kind compensation	Allows for either cash or in-kind, though requires the replacement of residential structures at a new site	Strongly favours in-kind compensation, including provision of replacement housing and replacement land	Preference for in-kind / replacement compensation where possible, including replacement of residential structures

Compensation calculation	Must be “adequate”, “fair and reasonable”. Fixed compensation rates for crops and economic trees exist No format for other impact but also supports full replacement cost of some	At “full replacement cost”	Built assets at full replacement cost, based on market value. Crops and economic trees to be compensated in line with government scheduled rates.
Budget	Must be fully covered by the holder of the mineral right.	Must be fully covered by the project.	To be fully covered by SRL
Grievance mechanism	Required	Required	SRL grievance mechanism established and to be made available to all stakeholders
Resettlement assistance	Required	Required	To be agreed with project-affected people.
Post-relocation monitoring and evaluation	No specific requirement but expect living conditions to be same or improved	Required	To be undertaken to an agreed close-out date, supported by an independent Completion Audit.
Security of Tenure	Land Policy recommends but current law does not allow freehold in rural areas of SL	Required	SRL will help facilitate and provide Foinda community with the finances to purchase land under their own right as per Sierra Leone Land Law Cap122 through the land owning families and Paramount Chief as Custodian of the Land

4.4 SRL Approach

The SRL approach to managing the impacts resulting from land acquisition will be guided by the above requirements and underpinned by the principles outlined as follows:

Box 4.1 Principles Underpinning Resettlement and Livelihood Restoration

SRL Resettlement Principles

a) Avoid forced eviction and minimise involuntary resettlement. Alternative project designs are to be explored.

b) Incorporate resettlement and livelihoods restoration as an “upfront” project cost.

All costs associated with project-induced displacement shall be borne by SRL and included in up-front project costs and schedules.

c) Meaningfully engage with affected people.

Engagement shall be an on-going and genuine process from an early stage, inclusive of: appropriate disclosure of information, consultation, and the informed participation of those affected. The opinions of affected persons and other stakeholders shall be sought and incorporated into the decision-making processes. Options and alternatives shall be made available where possible. Communication shall be tailored to the language preferences of project affected people, their decision-making process, and the needs of vulnerable groups. Engagement will be directed by a documented Stakeholder Engagement Plan.

d) Establish a grievance redress process.

Establish a grievance mechanism to receive and facilitate resolution of grievances prior to project development. All submissions shall be responded to within an agreed time-frame by a dedicated Grievance Officer (s).

e) Follow a sequential process, compliant with the Government of Sierra Leone law and aligned with IFC PS5.

As a basis for determining entitlements, asset and inventory surveys will be undertaken and a clear cut-off date for eligibility established and communicated. SRL will prepare a RAP, accepted by the relevant stakeholders and informed by the RPF, as required for any project leading to displacement. In the areas of any inconsistency of requirements, SRL will default to IFC PS5 whilst ensuring compliance with the laws of Sierra Leone.

f) Proactively manage adverse impacts from land acquisition.

Full identification of the impacts of both physical and economic displacement shall be made, including restrictions on the use of, or access to land, cultural heritage and eco-system services. Impact management strategies shall be equitably delivered and tracked. Host communities shall be consulted about their views and needs, and be given appropriate support to reduce any negative impact caused by the influx of new settlers.

Principles Underpinning Resettlement and Livelihood Restoration (cont.)

g) Provide a fair and equitable set of compensation options and support services.

All affected persons, irrespective of their status (whether they have titles, legal or non-legal rights) shall be eligible for some form of assistance if they occupied the land before the entitlement cut-off date. Displaced persons shall be compensated - on a like-for-like basis or at full replacement cost for land and assets lost - in an expeditious manner and prior to displacement and the start of civil works. A Land Market Survey will be done to establish the real replacement cost of assets. Compensation standards will be transparent and applied consistently, and the provision of cash compensation shall be minimised.

Newly constructed houses will be made available to project-affected people before they are required to relocate. Assistance with physical relocation and transitional support shall be provided.

h) Reliably manage RAP related information.

A resettlement database shall be established and maintained, inclusive of census, asset survey, baseline and monitoring data and all compensation provisions and payments. Data privacy laws will be complied with.

i) Ensure that affected people are able to restore or even, living conditions and livelihoods.

Adequate housing, with security of tenure, will be provided to all physically displaced persons. Assistance will be given to all affected persons to re-establish their livelihood and income, and to compensate for temporary losses. People whose livelihoods are land-based, shall receive replacement land with equivalent productive potential and locational advantages. Where possible, project affected persons will be given employment opportunities created by the project, and a Livelihood Restoration Plan will be developed, implemented and monitored. Food security transition-support package agreed with PAHs will be provided for a period of 9-12 months. Regular quarterly monitoring will help determine whether their livelihood has been restored and food insecurity addressed by their livelihood activities.

j) Specifically provide for vulnerable groups.

Targeted support shall be provided to address impacts on any people identified as potentially vulnerable, including differentiated measures to allow their effective participation in planning processes.

k) Monitor implementation of the RAP.

A procedure has been established to regularly monitor and document the effectiveness of RAP implementation and compliance with legal and/or contractual obligations and corrective actions shall be taken as necessary. A completion audit will be undertaken by competent and independent resettlement professional, once all mitigation measures have been substantially completed and displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods.

5 Socio-Economic, Census and Asset Inventory Surveys

5.1 Introduction

This Chapter describes the process and methodology used to undertake the *Socio-economic, Census and Asset Inventory Surveys* in late 2017. It outlines the baseline data collection activities undertaken for the Project and analyses the results. Competent surveyors captured details of all affected structures (residential structures and annexes), land and crops. They also collected socio-economic data of the affected households and individuals to identify the project's adverse impacts.

The objectives of the Socio-Economic Surveys were to: identify potential adverse impacts on project affected persons and potentially vulnerable people and households; to refine livelihood supports; and to serve as a baseline to measure effectiveness of resettlement plans and mitigation measures.

The IFC (RAP Handbook, p. 12) notes the importance of comprehensive data collection in the preparation of a Resettlement Plan:

“The ultimate goal of a RAP is to enable those displaced by a project to improve their standard of living—a goal that requires an examination of social, environmental, and economic conditions beyond simple physical inventories.”

SRL conducted a detailed survey of all losses that will result for each household, enterprise, or community affected by the project. The survey accounted for land acquisition and loss of physical assets as well as loss of income. Information on vulnerable groups, livelihoods and standards of living; land tenure and transfer systems, use of natural resources, social services and public infrastructure, such as water sources, forest resources, and community structures were captured.

5.2 Previous Resettlement-related Studies

Several studies were conducted at Foinda over the last 20 years. A Resettlement Action Plan (RAP), inclusive of a detailed survey of Foinda, was prepared in 2001 to guide the relocation process and a number of subsequent socio-economic surveys have been conducted in Foinda.

In 2015, the Community Affairs Department (CAD) assessed facilities in Foinda, capturing some socio-economic and asset data. This exercise was executed with limited scope – to identify households and dwelling structures that may need repairs. Various consultants have also been engaged with the task of conducting audits and reviews that provided some baseline data on Foinda.

5.3 2017 Foinda Studies

5.3.1 Rationale for updated studies

The SRK Audit Report undertaken in 2013, stated that, “While the RAP prepared by Knight Piesold in 2001 for Foinda Village took into consideration Good International Industry Practice (GIIP), the document is out-dated and needs to be aligned with recent and current international standards to be applied as a template for future resettlement planning for SRL.

Other relatively recent secondary data reviewed suggests that significant changes have occurred in terms of the increased number of dwelling structures in Foinda Village. This was evident after a visit to the village in September 2017 and supported by the SRK ESHIA: SIA Draft Report of 2017. Based on observation, the number of structures (primary and secondary) in Foinda is significantly more now than it was in 2001.

5.3.2 2017 study objectives

The updated 2017 studies have been undertaken to capture credible and accurate data that will be analysed and provide information to meet the following objectives:

- enable entitlement and compensation payments for each affected household to be determined and agreed;
- help SRL understand the socio-economic context of the study area (Foinda) including the social, health, historical, political and economic conditions.
- provide data that identifies and predict adverse impacts and plan mitigating actions for Foinda
- provide baseline information for livelihood restoration planning and intervention, as well as for future monitoring and audit purposes.
- identify vulnerable groups whose conditions may be exacerbated by the impacts of the project
- ensure SRL is compliant with all Government of Sierra Leone (GoSL) statutory obligations and in meeting with IFC Performance Standard 5.

5.3.3 Study Plan

Data has been collected for all household members, including those who may not be resident at the time of the study. Heads of households, or their representatives, were interviewed. All structures were included in the inventory regardless of whether they are permanently or intermittently occupied. In some cases, remittances from family members living outside a household can account

for a significant proportion of total income for that household. For conducting this baseline study, the following steps were taken:

- prepare a Study Plan;
- conduct the Baseline Study according to the Study Plan;
- analyze the collected data and review the generated results;
- verify data through further interviews, observations and ground-truthing methods; and
- formulate the Baseline Report

Table 5.2 Summary Study Plan

A	Primary structures survey	SRL
1	Fly drone and acquire images over Foinda	Mine Survey Team
2	Stitch and geo-reference images for easy data capture	GIS Specialist
3	Digitize settlement features (especially buildings) from the geo-referenced images.	GIS Specialist
4	Code all objects digitized (buildings, huts, kitchens, wells, etc.) and produce a draft plan of Foinda	GIS Specialist
5	Do ground truthing by marking up all objects as per draft layout plan; *Indicate any object on the layout plan which has not been captured during digitizing	Mine Survey Team
6	Provide final layout plan to the Resettlement Survey Team	GIS Specialist
7	Acquire/obtain details about objects/buildings (e.g. whether an object/building is a dwelling house, hut, kitchen etc.). Update settlement dataset accordingly.	Resettlement Survey Team
B	Crop Assessment	
1	Provide support to the crop assessment team, per the normal crop assessment procedures, by marking out assessment limits, measuring areas, and generally validating assessments, using suitable means.	Mine Survey Team
2	Produce maps of crop-assessed areas	GIS Specialist
C	Surface Rent Surveys	
1	Provide current Surface Rent Map of the area, as a guide to understanding land ownership at and around Foinda	GIS Specialist
2	Using appropriate survey tools (DGPS, etc), and with facilitation by CAD, survey the limits/boundaries and sizes of land, and capture and document data about land parcel ownership.	Mine Survey Team
D	Socio-economic, Census and Asset Inventory	
1	Questionnaire designed and reviewed	Resettlement Manager (RM)
2	Handheld devices programmed and questionnaire uploaded and reviewed	IT Manager; RM
3	Enumerators recruited and trained x 5 (Supported by 2 SRL Staff from Community Affairs Dept-CAD)	HR Dept
4	Crop Assessment and Asset Officer (CAD) inducted	RM
5	Stakeholders engaged and informed of study and commencement date	RM
6	Transportation to move Enumerators to and from the field (Foinda Village)	Drivers/Transport Team

7	Final meeting with stakeholders of Foinda community on 14/11/17 to kickstart the Study	CAD/ RM
8	Commence Study	CAD/RM
9	Meeting with Imperri Chieftom PC and Chiefs/Speaker to update on exercise and engage on resettlement process. PC's Residence	RM
10	Daily monitoring of data collected to ensure QA/QC – Feedback provided to Enumerators daily	IT Manager RM
11	Post Study Data Verification (Field and Office)	IT Manager RM

The detailed Socio-Economic Surveys covered the following main topics:

- demographic information and household composition
- education & skills base
- economic activities & livelihoods
- health & welfare; access to water & sanitation

All households residing in Foinda village were included in the Socio-Economic Survey. This was 100 per cent sampling of dwelling structures and households. The crop survey gathered the following information:

- basic owner/occupier information
- farm boundaries
- basic crop information
- ownership interests in the land
- dated photographs of the farm and the farmer
- GPS coordinates and photos of the farm
- sign-off by relevant farmers/owners and witnesses

Farmers affected and displaced were informed by SRL that payment of compensation would be made before they move to their new location. SRL is encouraging displaced people to manage their compensation wisely and exploring the option with them to attend a money management training program which might be made available to all recipients of compensation. Recipients are strongly encouraged to take advantage of this opportunity in order to gain the skills that will help them maximize long-term benefits from the compensation payments.

5.3.4 Study methodologies

SRL balanced quantitative and qualitative methods of gathering data to ensure a complete understanding of the social profile of Foinda.

5.3.4.1 Quantitative surveys

Quantitative data gathering methods were used during the study as residents were asked to complete a questionnaire. This helped guided the collection of reliable statistical results and numerical data analysis. Survey sample was 100 percent.

5.3.4.2 Direct Observation / Simple Counting

Direct observation is one of the simplest ways of gathering objective data. It was useful for obtaining simple quantitative data for immovable communal assets in Foinda such as the water wells, school, mosque, and other physical communal assets. The advantage of this is that it provided reliable and objective data that obtained and analysed with ease.

5.3.4.3 Focus Group Discussion (FGD)

Focus group discussions were held with the Madina community at FM. The Madina community are considered ‘host’ community as they reside closest to the new location chosen by stakeholders and affected people of Foinda. It is worth pointing out that Madina residents are not the landowners neither have tenure security for the land.

- The facilitator gathered information by leading the discussion around a specific topic and asking open-ended questions.
- It was purpose-oriented – to look at how their current living condition is perceived and their thoughts about the relocation of Foinda to their area.
- The group discussions lasted an hour and half, so that participants can return to their daily activities with minimal disruption.

In addition, a Focus Group Discussion was held with the women of Foinda to gauge their opinion of the resettlement process and consult on livelihood activities being planned. A key message out of this was their desire to engage in commercialised farming, rather than their current subsistence farming activities. The women requested seedlings as well as training and financial assistance to grow their farming interests. There was limited interest raised about technical and vocational training.

5.3.5 Socio-economic, census and household survey planning

5.3.5.1 Study Team Formation

- Recruited former SRK Enumerators (used to conduct the ESHIA Studies in September 2017). The Enumerators have tertiary level education. An additional one (1) day training and induction was provided to the Enumerators by SRL IT Manager and Resettlement Manager.
- SRK Trained Enumerators/ Surveyors are familiar with the communities already and were available to start at short notice.

- The SRL Resettlement Manager with previous experience conducting similar studies in Sierra Leone and The UK, developed the tools and supervised the implementation of this exercise.
- The SRL IT Manager with strong NGO background prepared the handheld devices and technology, as well as delivered the training in using digital questionnaire
- The Drone exercise for aerial imaging for crop and land assessment was conducted by SRL Technical Services Team including a land surveyor and GIS specialist
- SRL Crop and Asset Specialist led the field survey in conducting crops and economic trees assessment.

5.3.5.2 Actions taken to ensure quality control of HHAS

To ensure the quality of data collected is of the standard required, the following actions taken are summarised in the table below

- Expert guidance applied for determining the survey design and sampling methods
- Determined recruitment criteria (education, previous experience using digital tools/gadget, literacy, language proficiency, etc)
- Determined required numbers and gender ratio of Enumerators
- Selected capable data collectors (enumerators), with similar qualifications
- Provided training to Enumerators on the contents and structures of questionnaires, and on methods of survey conduct
- Provided training on the specific intent of each question, and on how to question and respond
- Employed diverse training instruments, such as lectures, role playing sessions, and mock interviews
- Carried out mock interviews of persons from backgrounds similar to those to be surveyed
- Confirmed whether consistency of responses can be ensured, by having several data collectors (enumerators) ask the same questions to the same respondent
- Verified accuracy by comparing supervisors' results with those of data collectors (enumerators)
- Reviewed questions based upon the mock survey results, and if inconsistencies continue to occur retrain survey administrators
- Enumerators fluent in English and local language
- Conducted survey in respondents' local language - Mende and Krio
- Supervised and managed surveys in the field
- Reviewed any incomplete or non-responses
- Reviewed consistency of responses
- Daily debriefing/briefing at start and end of day

5.3.5.3 Social Baseline and data analyses

The IFC (RAP Handbook, p. 12) notes the importance of comprehensive data collection in the preparation of a Resettlement Plan;

“The ultimate goal of a RAP is to enable those displaced by a project to improve their standard of living—a goal that requires an examination of social, environmental, and economic conditions beyond simple physical inventories.”

167 household interviews were recorded digitally using Poimapper application. Data analysis was undertaken using the same software. The data was reported in the following format:

- tables
- graphs and charts
- frequencies, per cent ages, and averages
- mean, mode, and standard deviations
- minimum and maximum ranges

5.4 Survey findings

5.4.1 Demographic information and household composition

The data from the study puts the population of Foinda Village at 822 people with 167 households. Therefore, there is an average of 4.9 members making up a household. This figure does not reflect the PHC (2015) census as it is much lower than the average household sizes in Moyamba and Bonthe districts, specifically the later, set at 5.1 and 6.2 respectively. There are 58 women headed households compared to 104 male headed-households. There were three people who presented themselves as household heads for more than one households.

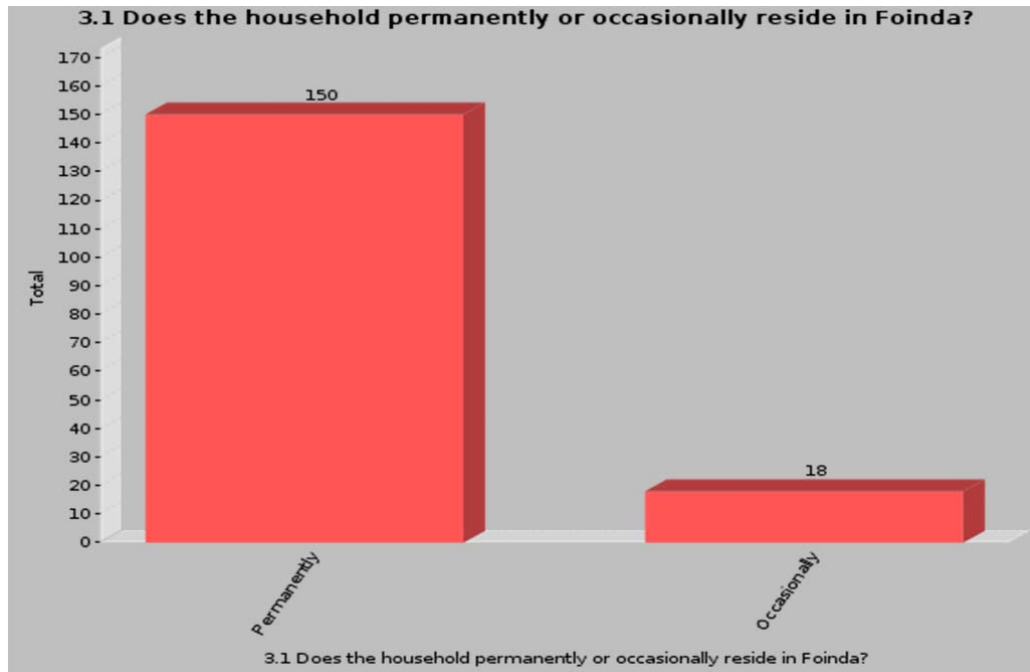


Figure 5.2 Permanent or occasional resident of Foinda

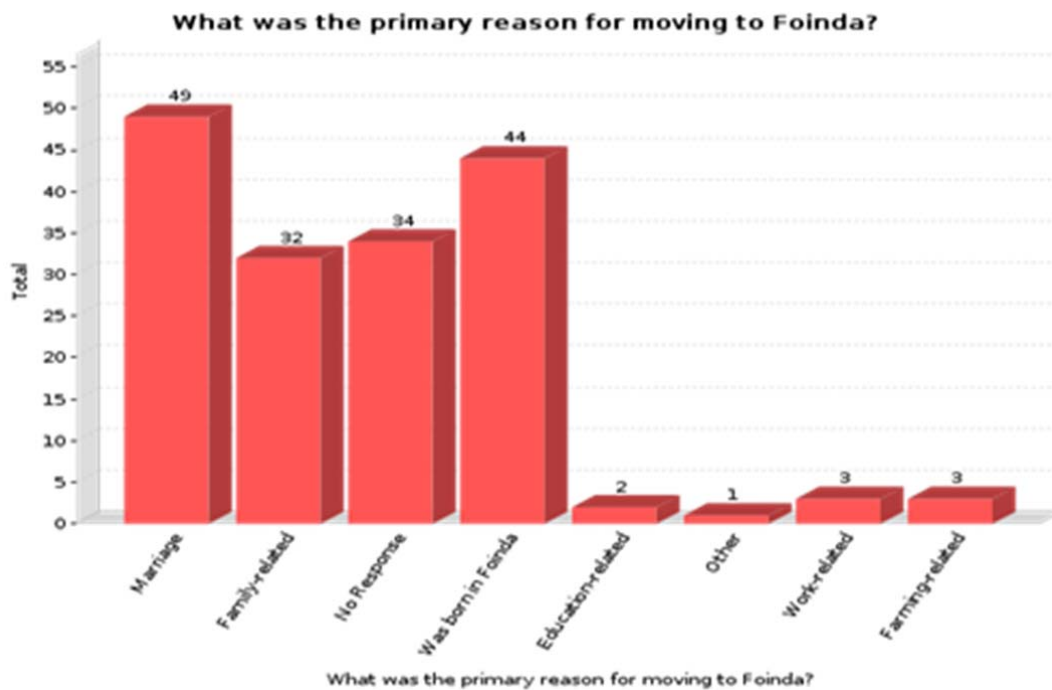


Figure 5.3 Primary reasons for moving to Foinda

When asked if the household permanently or occasionally reside in Foinda, 89 per cent said permanently. The response in the figure above demonstrates that majority of Foinda residents live permanently in Foinda. Eighty-seven per cent of respondents who are household heads stated they

are indigenes of Foinda. The two primary reasons for respondents' being in Foinda was mainly as their place of birth and result of marriage ties.

Interestingly, there was impression Foinda residents were 100 per cent in favour of moving to Foinda-Madina (FM), the land that was originally agreed to that they had requested with the support of their Paramount Chief (PC) and understanding from SRL. The PC of Imperri wanted the replacement of houses to be constructed FM location, to retain and grow community unit and cohesion. The responses indicate that 66.5 per cent of household heads chose the FM location. From analysing the data, it appears that the rest of the community wanted the flexibility of cash compensation or to have their houses built in bigger town such as Moriba Town, part of Imperri Chiefdom.

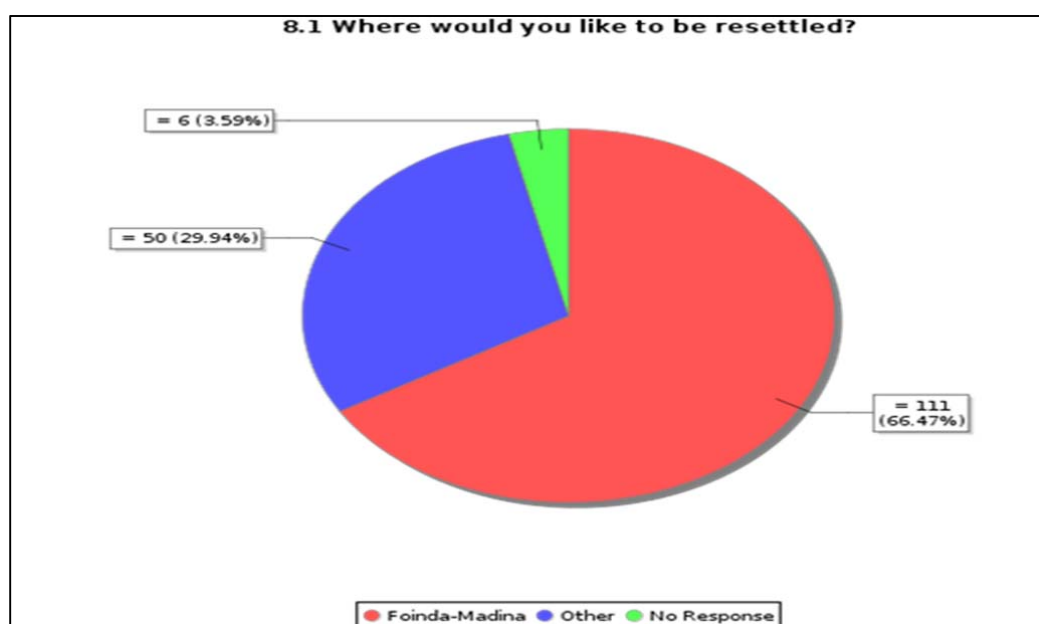


Figure 5.4: Choice of relocation site

Table 5.3 Age distribution in Foinda

Age brackets	No. of people
Under 1	21
1-5	136
6-10	149
11-16	136
17-21	117
22-35	169
36-50	63
51-60	14
Above 60	16
TOTAL	822

From the table above, age distribution from the data demonstrates that 379 (46 per cent) of the population fall within 17 years and above. Those aged 16 years and below constitute 54 per cent of the general population. This supports national data in demonstrating that young people are the majority in society.

5.4.2 Population Growth

Data analysed as per table below indicates a fall in population by 23.9 per cent from 2001 (SRL Foinda RAP 2001) to 2017 (SRL resettlement survey data). Outward migration to bigger towns is the only explanation for this. However, comparing this data with the 2006 Baseline Audit Report conducted by SRL Community Affairs Department, Foinda then had a population of 769 people with 117 household heads. See excerpt from the referenced document below titled 'Table 1: Population estimate in the study area'.

Table 5.4: Population figures growth

Sierra Leone	1985	2004	2015	Growth 2004 to 2015
National	3 515 812	4 976 871	7 092 113	42per cent
Southern Province	741 377	1 092 657	1 441 308	32per cent
Bonthe District	105 007	139 687	200 781	44per cent
Imperi Chiefdom	Not available	17 576	33 394	90per cent
Foinda Village		1080 (2001 population)	822 (2017 population)	23.9per cent (Population fall 2001 – 2017)

5.4.3 Physical structure – houses

Most of the dwelling structures are constructed with sticks and mud with corrugated iron sheet to cover the roof. The data shows that respondents use more of corrugated iron sheets than locally sourced thatch grass roof.

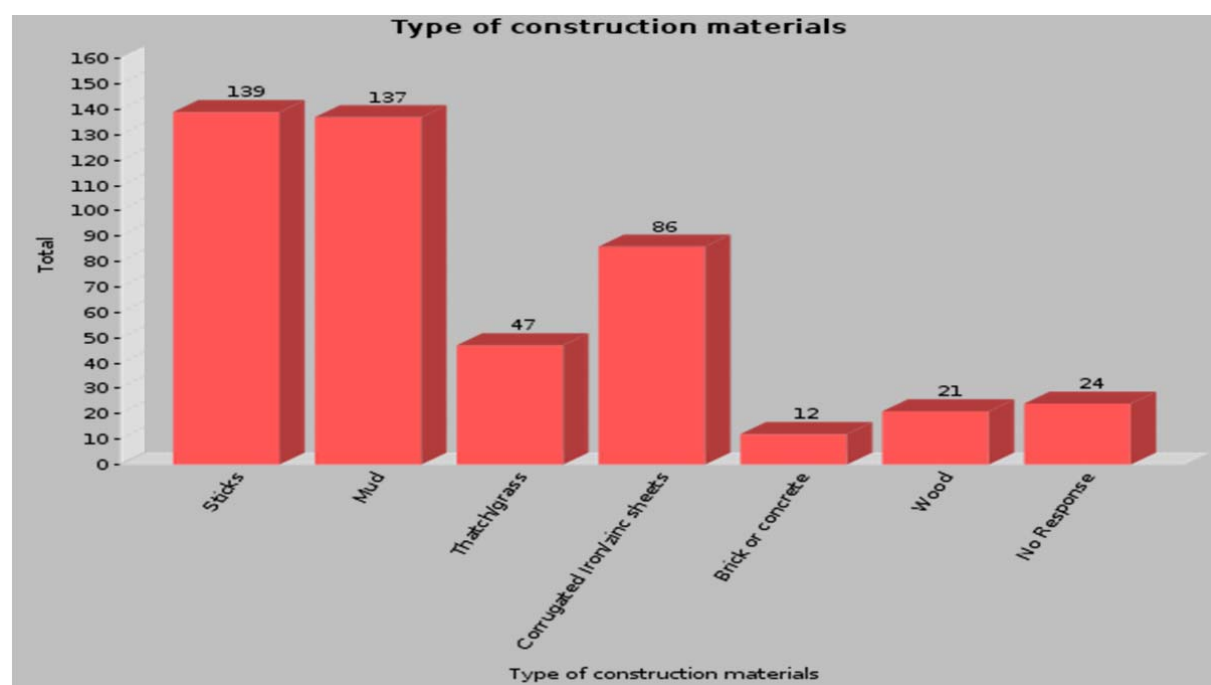


Figure 5.5: Type of construction materials for houses

5.4.4 Level of Education and skills

The data points that there are 360 residents currently attending school. Second to this is the 124 residents who never had formal education. Out of the 708 who are of the age for formal or informal education, 552 have at least entered into primary school or graduated from technical/vocational training; or enrolled in a learning institution. This demonstrates interest in learning and education within Foinda. The data also presents existing opportunities to help support more children to graduate from primary and secondary level education and subsequently access tertiary learning. SRL's investment in JADA in partnership with GIZ would help provide skills development opportunities for young and working age residents of Foinda also.

Table 5.5 Education levels

Education type	No. of people	Percentage
Those In School	360	45
No Formal Education	124	15.5
Not Of School Age	92	11.5
Completed Primary School	90	11.3
Quaranic Education	64	8
Attained WASCE	37	5
Other Training	19	2.4
Tec/Voc Training Graduate	9	1.1
Total Respondents	800	

5.4.5 Economic activities and livelihoods

The main sources of income from majority of the respondents in their households got their income from parents as it is clearly stated that out of 818 interviewees, 409 got their income from their parents; 173 got theirs from farming activities while the rest are mainly on petty trading activities and remittances.

5.4.6 Current living conditions

The current living condition of the people of Foinda as clearly stated below demonstrates that they are living in poverty. Only seven (7) of them assessed their living condition as good. Thirty-two expressed that their living condition is of average standard. As presented in the table below, 80 per cent of respondents considered their housing condition poor. No definition of poor was provided them as their opinion was deliberately sought from the way they perceive their status.



Table 5.6 Housing conditions

Current living (housing) condition	Responses by household heads
Poor	97
Average	32
Very Poor	25
Good	7
Total	161

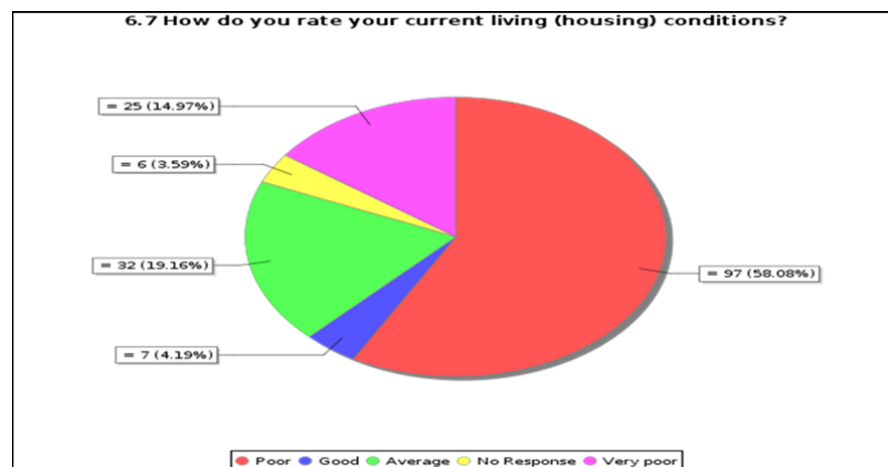


Figure 5.6 Perceptions of housing conditions

5.4.7 Agricultural and farming activities

Residents of Foinda are actively engaged in farming activities as their main source of livelihood. This supports national census data for Bonthe district. From the data collected during SRL HHAS, residents involved in farming and agriculture responded as per table below. Frequency here refers to the number of times respondent stated they have such crops/trees as part of their farmland. The top 6 crops/trees mentioned by respondents(farmers), are: banana(53),cassave(52), cashew nut(46), pineapple (34), pepper(31), mango(28), oil palm (26), Coffee (25), potato (20), coconut:palm tree(15) and plaintain (15).

Table 5.7: Agricultural produce

Crops/Trees	Frequency	Crops/Trees	Frequency	Crops/Trees	Frequency
Banana	53	Cocoyam	13	Cocoa	3
Cassava	52	Bean	8	Orange	3
Cashew nut	46	Paw-paw	8	Breadfruit	3
Pineapple	34	Okra	7	Pumpkin	3
Pepper	31	Maize(Corn)	7	Pumpkin	3
Mango	28	Rice	7	Guava	3
Oil Palm	26	Bennie	6	Bitter Ball	2
Coffee	25	Water yam	6	Pear	1
Potato	20	Groundnut	6	Chinese yam	1
Coconut	15	Citrus/Lime	5	Lettuce	1
Plantain	15	Millet	4	Okra	1
Kola nut	14	Sugar cane	4	Ginger	1
Cocoyam	13	Coffee	4	Krain-krain	1
Garden Egg	10	Sorghun	3		

Crop assessment and farm land data captured during the study will help inform decisions that ensures compensation is only paid for crops and trees that farmers may never have access to as a result of land take or damage. For areas that may never be affected, SRL will endeavour not to

damage these crops/trees to ensure farmers have safe access of reasonable distance to their farmland after they have moved to their new location.

The social arrangement for land use for agriculture was considered for the study. When asked about affected land plot use, out of the respondents of 143 household heads, 73 per cent (105 household heads) stated that they use household members to engage in agriculture/animal husbandry. Only thirty-eight required help to support their farming activities.

5.4.8 Economic activities and earning

Foinda being a rural community are generally involved in different economic activities for their livelihood, mainly agriculture and farming. Few earn their living through their employment with SRL and its contractors. From the data collected, only thirty-four respondents who are household heads are engaged in some form of small businesses as presented in the table below. The population in the study area had adopted a number of coping mechanisms to mitigate hardships. Petty trading is one of such that supports livelihood in Foinda. Out of responses, 74 per cent are engaged in petty trading that does not include food items, shoes and clothes.

Figure 5.7 Agricultural and livestock activities

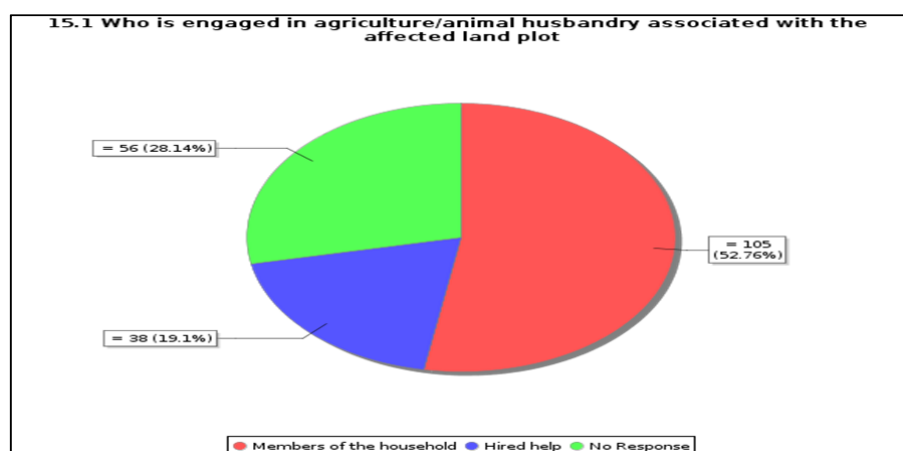


Table 5.8 Business activities

Business activities	Number engaged
Petty Trading	25
Food Items/stuffs	5
Shoes, Clothes,	2
Food Items	
General trading	2
Total	34

Table 5.9 Monthly income earnings

MONTHLY INCOME EARNINGS	RESPONSES
Number of people	Leones
36	500,000
32	200,000
20	20,000
17	300,000
13	600,000
13	100,000
12	50,000
10	30,000
9	150,000
8	400,000
Average	235,000

The data also presented 12 residents only who are permanent employees of SRL. This number is quite low but could be because of various factors including lack of required skills available. General monthly household income earnings averaged at Le235,000 with the highest been Le600,000. The majority of the project-affected households derived low monthly incomes (below or equalling minimum wage of le 500,000 per month) from agricultural activities.

**Figure 5.8 Garri production in Foinda as part of their livelihood**

When respondents were asked about the assistance they and their household members need, 25.8per cent (115 household heads) stated food. Second highest was employment at 23.5per cent (105 household heads). The data below ranked skills training/education in third place with social assistance (water, health and sanitation) ranked fourth. The data suggest that food, employment, skills training/education and social assistance is considered most important to respondents in that

the assistance will improve on their well-being. This data will also help inform all SRL livelihood planning and intervention activities as well as community investment programs for Foinda and host communities.

5.4.9 Health & Welfare

i. Health facility

There are no health facility such as clinic, hospital or pharmacy in Foinda. The nearest facility is a Maternal Child Health Post (MCHP) at Junctionla, about 4 km from Foinda.

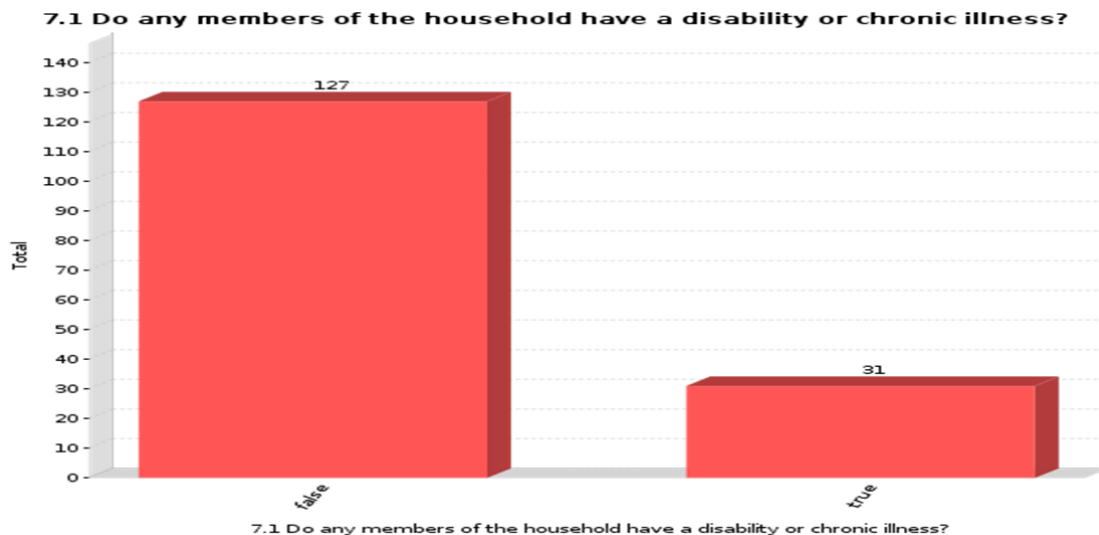


Figure 5.9 Disability and chronic illness

Out of a 158 respondents as household heads it was reported that 31 people have some form of disability or sustained ill health.

5.4.9.1 Water & Sanitation

As per graph below, out of 162 respondent household heads, communal hand-pump (2 water wells) constituted the predominant source of water for households living in the study area (88per cent). There is no pipe-borne water in Foinda. Just 5.4per cent access stream as their main source. This is quite low possibly because most of their streams have dried up as a result of SRL active mining activities. To mitigate this impact, SRL provided one hand-pump well and two 10,000ltrs water tank filled up seasonally during the dry season – when it does not rain. There are also two other locally-dug wells that serves the community when it is operational. Bonthe district Council through its funding partner (European Union) recently constructed a water well with hand pump and two VIP latrines for the primary school. These facilities were almost completed before they were stopped because of Foinda's planned relocation.



Figure 5.10 Hand pump water well in Foinda constructed by SRL

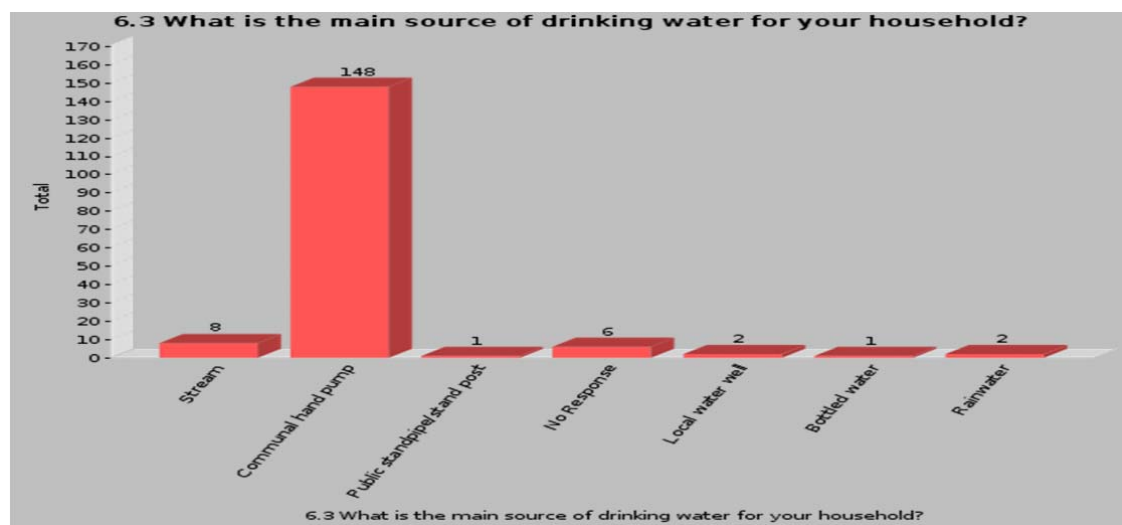


Figure 13: Main source of drinking water

In the study area the majority (88 per cent of households) of the households source their water from communal hand pumps located within Foinda, at a distance of less than 100 meters from their house. There are no standing pipes or pipe borne water in Foinda during field observations and ground- truthing exercise. Women and children are predominantly responsible to fetch water from the source.

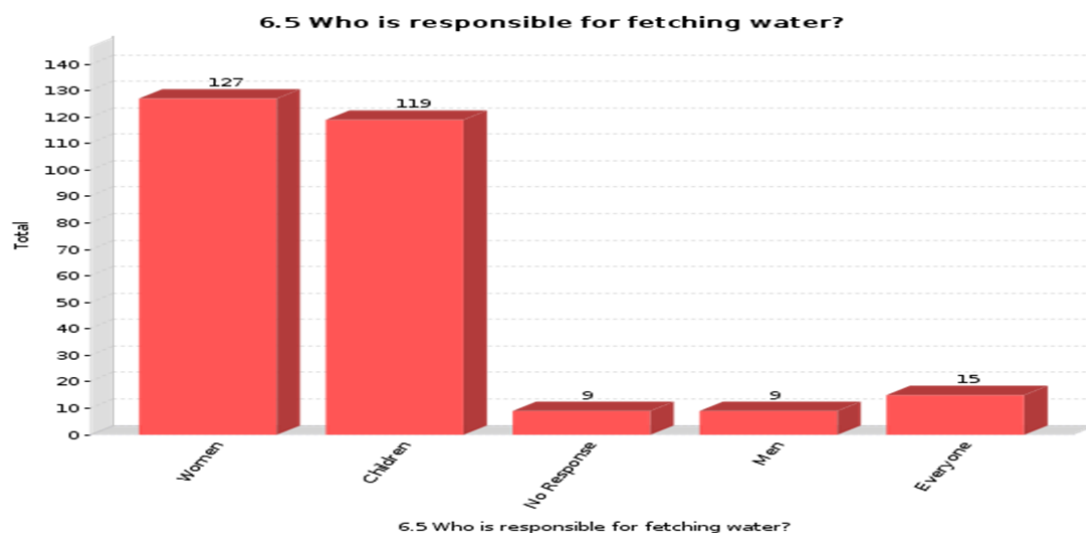


Figure 5.11 Responsibility of fetching water

In terms of toilet facilities as captured during the survey (see graph below), 92 per cent of the respondents (163 household heads) used the bush as their toilet. There are only two (2) VIP latrines in the entire community. The data also note 7 per cent use local pit latrines. The number that access and use the bush is exceedingly high and pose serious health risks to the community. SRL is providing all replacement houses with a VIP latrine; as well as at the school.

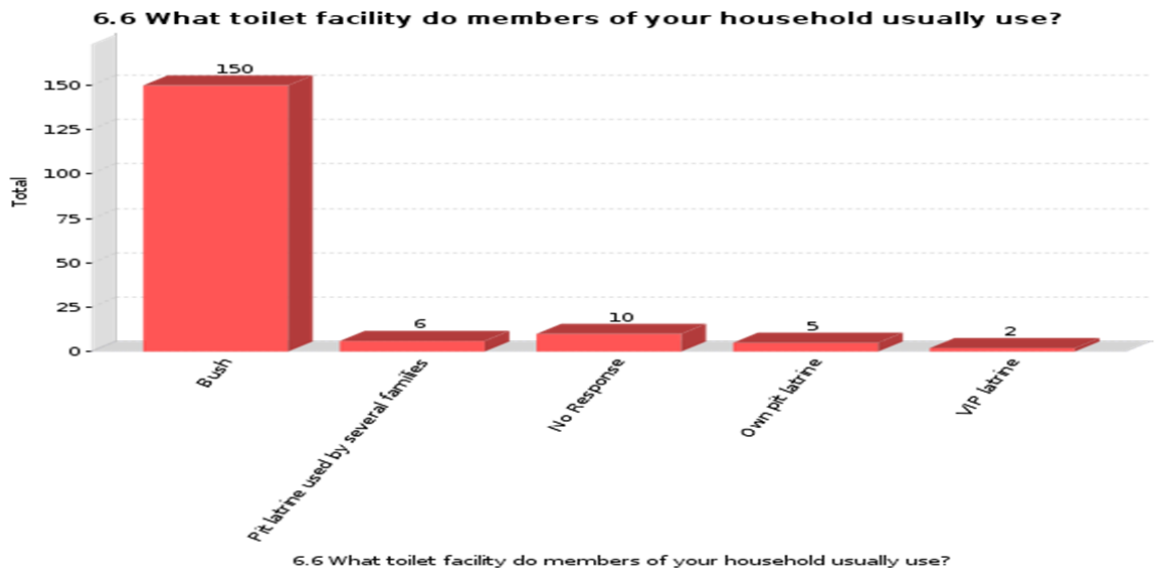
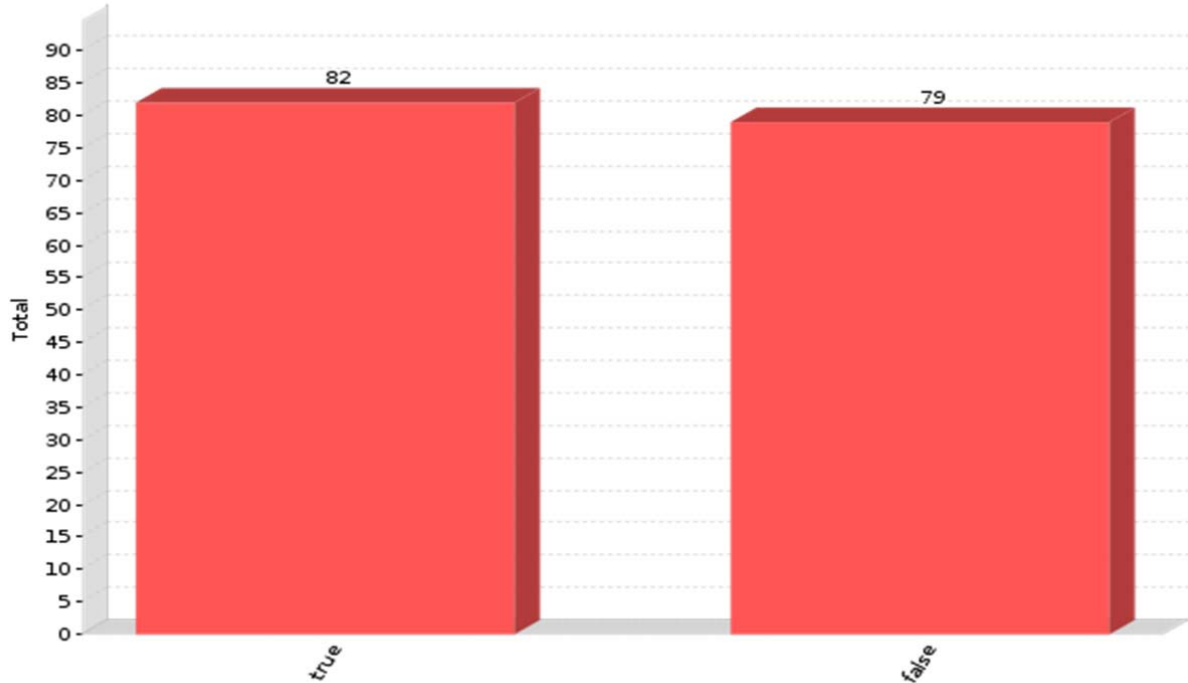


Figure 5.12 Toilet facility available

5.4.9.2 Communal assets

There is a forest, stream and some natural resources impacted by the project that the Foinda community will lose. This loss adversely impacts on their household livelihood as well as their communal and livelihood assets. Out of a total of 161 household respondents, eighty-two confirmed that they own such asset as a community and seventy-nine responded in the opposite. From observation, there is a stream, forest and some natural assets located in Foinda. SRL will ensure these assets are replaced or alternative for similar use available in the new site. This forms key part of the land selection process as presented in the next Chapter.

16.1 Is there a publicly owned forest, stream, river, lake or other natural resource near the affected land that the respondent or any member of the household is using in connection to the household's livelihood?



am, river, lake or other natural resource near the affected land that the respondent or any member of the household is

Figure 5.13 Natural resource asset- forest, streams

Finally, the data indicates that Foinda lacks social amenities, educational opportunities, health facilities sought for a better living. The respondents understand their needs as per the pie chart below and desire a better life.

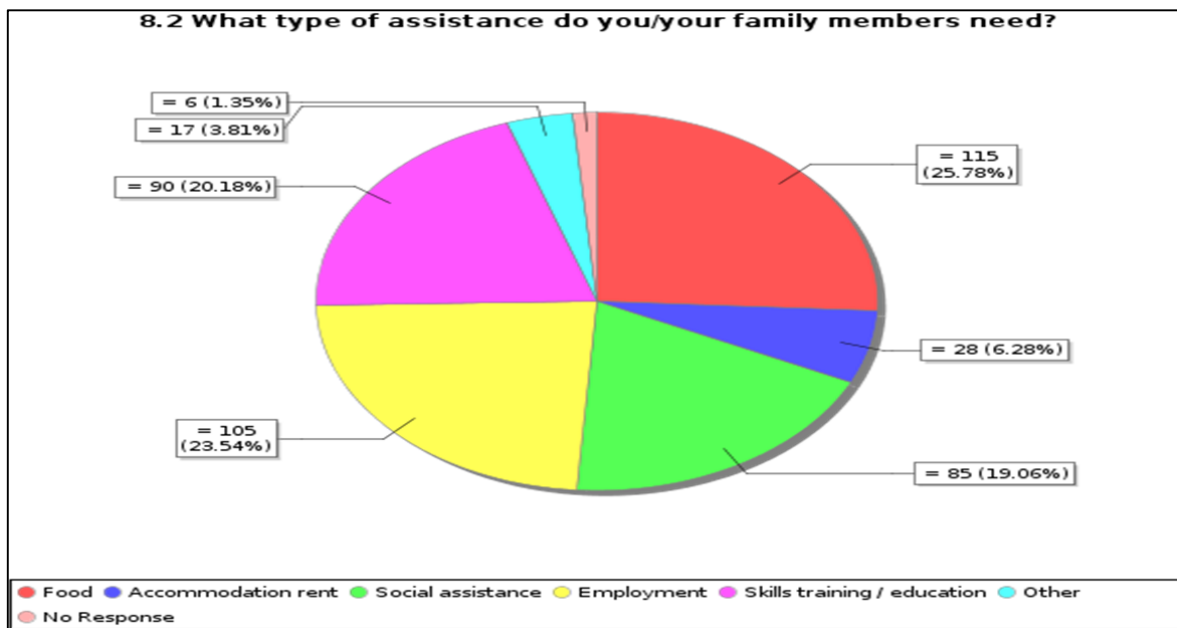


Fig 5.14 Foidna community needs and assistance

6 Selection and acquisition of Resettlement Site

6.1 Introduction

This chapter details the process undertaken to identify an appropriate resettlement site for Foinda. This includes the process of identifying alternative sites in consultation with stakeholders and undertaking host site assessments in order to ascertain what the impacts of the resettlement might be on those communities that (if required) will receive displaced people. Taken into consideration is the size of land available, costs of acquisition, suitability for livelihood activities such as agricultural and livestock farming and safe access to farming land.

6.2 Historical site selection - Foinda and Madina Villages

According to the 2001 Foinda Resettlement Action Plan (RAP): *The Foinda and Madina village relocations were initiated according to the provisions of the Phase 2 policy and under a 1992 IFC loan. The relocation of Madina was largely completed however the Foinda village resettlement was interrupted and will be restarted under this RAP.*

Figure 6.1 – Map of Foinda and Madina



Locations for the relocation of Foinda and Madina villages were selected during initial resettlement planning in 1994. Discussions were held with the two communities and consultations carried out with local and chieftdom authorities. The two villages chose to relocate to a common site approximately 2.5 kilometers from the older villages. The new site is divided by the main road between the mine site and the chieftdom headquarters at Gbangbama with the new village of Foinda on one side and

Madina on the other. This site is on lands traditionally owned by residents of Gbangbama village, but is located near to areas of traditional bush, which were lying fallow at the time of the site selection.

In the course of meetings in July 2001 some Foinda villagers expressed concern that the site might not be suitable under current circumstances. Since the time that Madina villagers had settled in 1995 much of the surrounding arable land is now being cropped and there were concerns about the availability of arable land, particularly for vegetable crops commonly grown adjacent to the village. Madina was now in the position of a host community and it was felt that G:\1800s\1807A\RAP\final RAP102601.doc 25 October 2001.

Foinda villagers would be in a disadvantaged position and would have to negotiate for access to land. Some Foinda villagers considered that it might be preferable to site their new village in the remainder of their 'bushlands' not affected by the mining operations and associated ponds, particularly since they would have better control of land resources. In early August 2001, Foinda villagers met with local Paramount Chiefs to review the site selection that was originally chosen in 1994. The outcome of this meeting resulted in agreement that the original site adjacent to Madina is still preferred on the basis of reasons contained in

Similarly as was stated in the 2001 RAP, at the commencement of the current Foinda Resettlement Project, Foinda residents were again consulted on their preferences for resettlement locations. While Foinda residents were previously 100 per cent in favour of moving to Foinda-Madina (FM), the 2017 survey responses indicate that 66.5 per cent of household heads chose the FM location. From analysing the data, it appears that the rest of the community want the flexibility of cash compensation or to have their houses built in bigger town such as Moriba Town, part of Imperri Chiefdom. There has been a preference indicated by the PC of Imperri for the replacement of houses to be constructed at the FM location, to retain and grow community unit and cohesion.

Further consultation was held with the community and their Paramount Chief. They have all agreed since that FM site is their preferred location. Project-affected people, as well as other key stakeholders including the Paramount Chief of the area and land owning families, were consulted on the proposed site layout and designs. Key stakeholders signed-off to confirm their active participation and agreement of the process, design, location and layout.

Allocation of dwelling structures to affected-people is a critical stage in the resettlement process and has been carefully conducted with series of consultation with project-affected people and households As much as the new site was identified and planned together with affected people, the following process was used for allocating houses

6.3 Allocation criteria

- Same number of rooms will be replaced as it was in their pre-relocation community. For example, a owner of three (3) bedroom dwelling structure will receive same in the new site. The only exception is for those who had one (1) bedroom dwelling structure, to receive two bedrooms. This is in line with good international industry practice and SRL's desire to align with such.
- Families or relations living close together in their pre-relocation houses were considered for the same in the new site, provided there was available dwelling structure(s) with the same number of rooms.
- Vulnerable people were allocated dwelling houses close to their support network and social amenities. Vulnerable may include people with disability or health challenges, single parent families, suckling mothers, terminally or long term illness, the aged

6.4 CONSULTATION PROCESS

- SRL prepared a provisional allocation map that was presented to the Foinda Resettlement Committee for consultation and engagement.
- After initial consultation on this allocation map, SRL and the committee prepared and agreed on a draft displayed at three key locations in the community. Some copies were shared with all-affected dwelling structure owners and households at a separate meeting that was agreed by all parties and a final draft version was agreed.
- SRL and all relevant stakeholders met to finalize, agree and sign-off on the allocation map
- Project-affected people dissatisfied with the process were reminded of their right to use the SRL Grievance Mechanism to make a formal complain

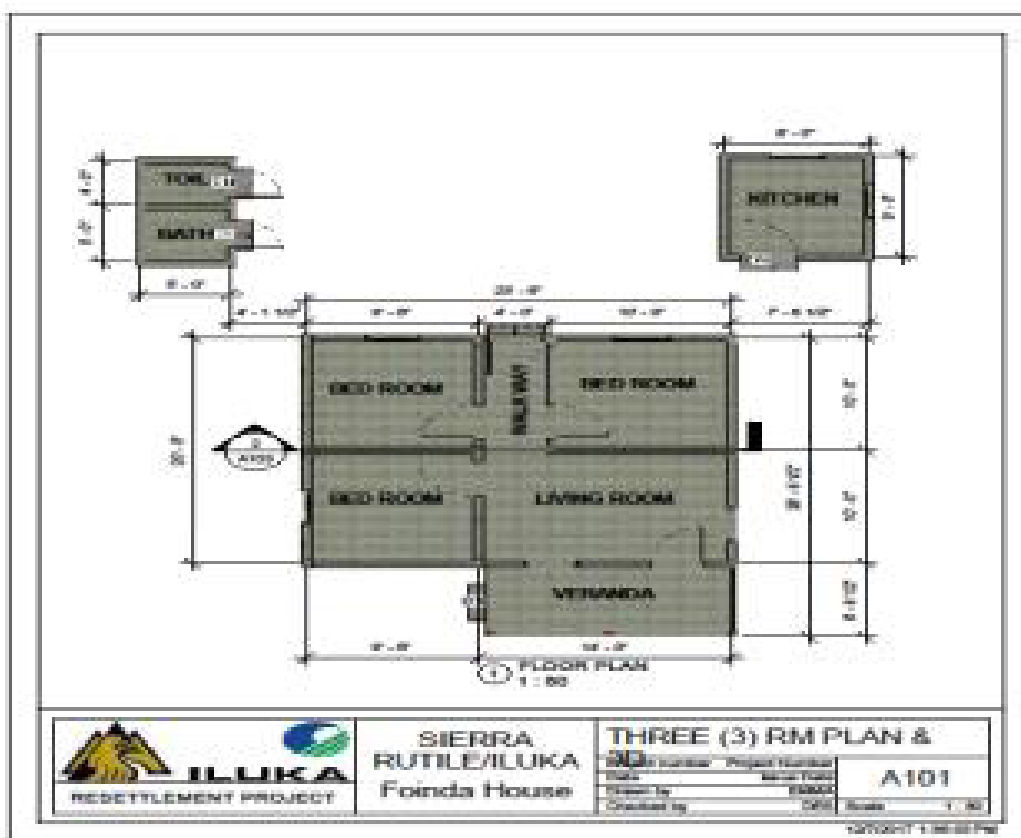


Figure 6.2 Proposed 3-bedroom house plan for Foinda

6.5 Resettlement site acquisition and tenure security

Land tenure in Sierra Leone is characterised by a dual ownership. The Western Area including the Freetown Peninsula is governed by an English system of land ownership which includes fee conveyances, mortgages and leases. Unoccupied and uncultivated land remain Crown (State) land. Thus, land in these areas are either owned by individual families or is Crown land (State land). Communally owned land does not exist in the Western Area. Land in the rest of the country (i.e. the majority of the agricultural land) is held in communal ownership under customary tenure and is controlled by the paramount Chief (traditional ruler) who is the custodian and administers it on behalf of their communities in accordance with customary principles and usage. Though there are minor differences among the various ethnic communities, the general trend in the rural areas is that land is considered a divine heritage not to be bought and sold. The responsibility to ensure the preservation of the land and subsequent enjoyment by future generations therefore rests on the community as a whole. The absolute interest in land vests in families. In other words, it is the land-owning family, which deals in its land. The Paramount Chief is regarded as the custodian of the land on behalf of

the entire Chiefdom but decisions regarding the land are the preserve of heads of the various land owning families.

The land required for the new village site at FM has been acquired by SRL on behalf of Foinda village, from Gbangbama village for the transfer of all traditional 'ownership' and land use to Foinda village. Acquisition by SRL means payment and facilitation of the process and subsequent production of documentations by an Independent licenced surveyor. SRL Resettlement Unit undertook a study of the current cost and market value of a plot of land within Imperri Chiefdom, Bonthe District. This information was required for two key reasons.

- To use during the negotiation of land acquisition from Gbangbama community for the to-be – resettled residents of Foinda Village
- To help SRL make a fair offer to landowners without leaving them disadvantaged and at the same time secure value for money for the company

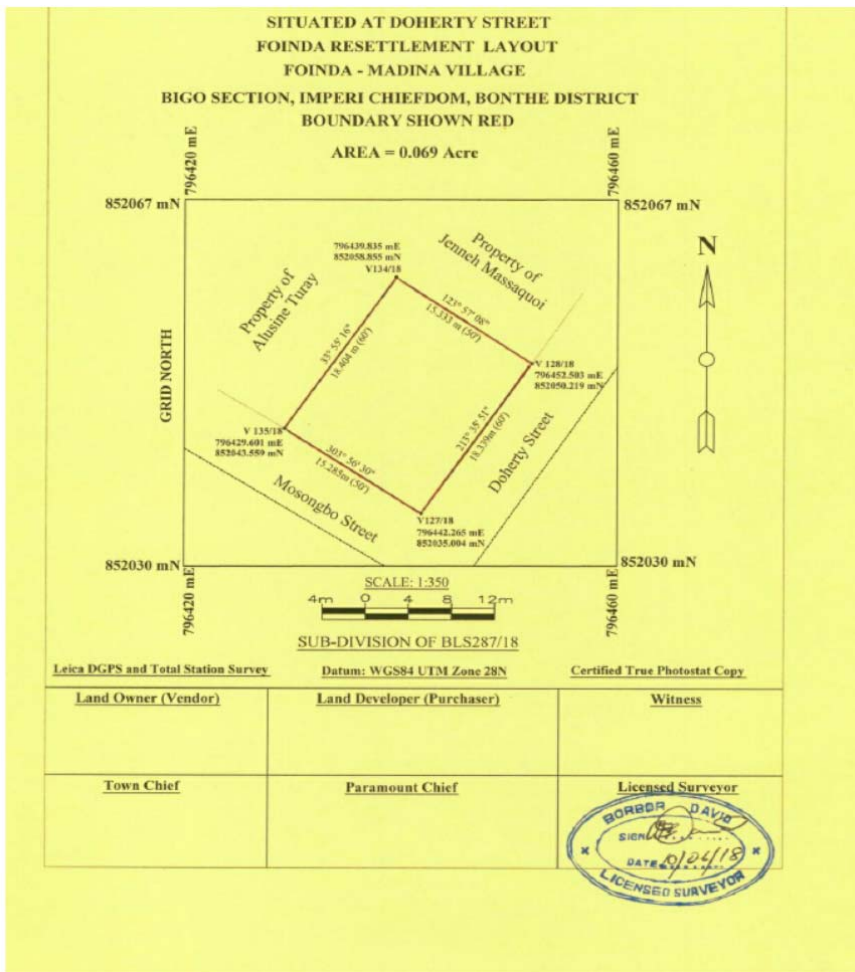
Research undertaken by the resettlement team of SRL in different communities around the mine including Mogbwemo, Moriba Town, Kpetema, Matta Galema, Mosenesi Junction, and Gbangbatoke, among others, concluded that the cost of one town lot ranges from 500,000 to a maximum of 1000,000 Leones. Land owning families agreed to sell land to Foinda homeowners for a fee of Le 1,000,000 per town lot. SRL acquired 41 acres of land on behalf Foinda village.

SRL is ensuring that each house plot has a plot title plan signed and approved by the Ministry of Lands, Paramount Chief, landowners and key stakeholders. This plan was developed and signed by the Government of Sierra Leone licenced surveyor, with the homeowners name presented on the plan as title owners.



Figure 6.3 Aerial view of FM

Figure 6.4: Sample Plot Plan approved by licensed surveyor



7 Compensation and Entitlement

This section defines SRL's compensation and entitlement framework and a summary of how this will be implemented during the Foinda Resettlement Project. It further explains the types of entitlements that will be offered, as well as the considerations in determining entitlements and eligibility – including requirements pertaining to the provision of replacement housing and cash compensation payments.

A preliminary entitlement matrix is presented at the end of this section. The community has been consulted on this and a final version agreed that is being used for calculating entitlement agreements.

7.1 Overview

SRL aims to provide fair and reasonable compensation for the loss of assets, at full replacement cost, and other assistance, to enable project affected persons to improve or at least restore their standards of living or livelihoods.

Eligibility for entitlements was informed by the census survey and asset inventory completed in November 2018, in accordance with the project's entitlement matrix. Table 5.1 SRL Entitlement Matrix, at the end of this section, details a project specific matrix for Foinda.

7.2 Types of Entitlements

SRL considers entitlements under the three broad categories: compensation, disturbance allowances, and livelihood restoration benefits.

a) **Compensation:** compensation will be provided in conformance with Sierra Leone law and IFC PS5. SRL will aim to offset loss of assets (such as structures and land) either in cash or in-kind compensation (i.e. provision of a replacement property to offset the loss of a residential house). Where compensation is provided in-kind, SRL will as much as possible commit to apply a like-for-like compensation for such assets and will avoid cash compensation as far as is practically possible.

b) **Disturbance allowances or transition support:** this is generally paid in cash and food packages. Such allowances will be provided by SRL to offset loss of rights other than ownership, as well as disturbance and inconvenience experienced by project-affected person. Allowances are a benefit provided by SRL in addition to compensation envisioned by Sierra Leonean law. Transition support agreed includes transportation for moving project affected persons and their personal effects from their old homes to their new ones; food

support for a period of nine to twelve months to provide food security during missed and lean farming periods. See appendix A8.

c) **Livelihood restoration benefits:** livelihood restoration is provided to support project-affected persons to restore livelihoods affected by project activities. Livelihood restoration benefits are generally delivered in kind and/or in the form of various services, including training and capacity building.

d) **Surface rent payments:** The Mines and Minerals Act 2009, Section 34. A, states that a holder of a large scale mining licence such as SRL, must pay surface rent for a land lease or other rights to use land. Therefore, landowning families of Foinda, whose land falls within this requirement, currently receiving surface rent payment will continue to receive such payment post-relocation.

7.3 Parameters for determining entitlements

Entitlement options should be determined with the following in mind:

- Project affected persons should be provided with choices among feasible resettlement options, including adequate replacement housing or cash compensation where appropriate.
- PS5 supports compensation through replacing assets and the provision of in-kind compensation.
 - Experience shows that cash compensation carries a high risk and is normally inadequate in helping poor and vulnerable groups re-establish their lost assets, particularly in the case of productive land. While SRL will aim to minimise cash payments, these may be required in certain instances, i.e. to compensate for seedlings, agricultural inputs, and/or a loss of income.
 - In-kind or like-for-like compensation may include items such as land, replacement houses and other buildings or building materials
- Replacement land of equal or better productive value is offered where practically possible.
 - It is important to note here that SRL may not pay any compensation for land situated within its surface rent areas. Such land is already the subject of surface rent payment to landowners.
- Replacement cost is defined as the market value of asset of equal productive use or potential, located in the vicinity of the affected land, plus the cost of preparation to levels similar to or better than those of the affected asset. In addition to the cost of any registration and transfer taxes; the cost of purchasing or building a new structure, with an area and quality similar to or better than those of the affected structure, including labour and contractors' fees and any registration and transfer taxes was covered by SRL. In determining the replacement cost, depreciation of the asset and the value of salvage

materials will not be taken into account, nor is the value of benefits to be derived from the project deducted from the valuation of an affected asset.

- Assistance or transition support may include a moving allowance, transportation and labour; and emergency food packages. This will include additional support measures for vulnerable people/households to mitigate negative impacts.
- Entitlement eligibility will be bound by the cut-off date and the specifics of all compensation agreements will be determined based on the Asset Inventory Surveys [see below]

7.3.1 Cut-off date

In functional terms, a resettlement cut-off date is the first step in the implementation of resettlement program. The resettlement cut-off date is the date that signifies a moratorium on settling, building or making improvements on affected land and/or structures. Fixed assets (e.g. built structures, crops, fruit trees, and wood lots) established after the cut-off date will not be compensated.

The cut-off date for the Foinda Resettlement Project was established as the 10th November 2017 and was agreed with stakeholders including the Paramount Chief; Acting Foinda Town Chief; Section Chief and SRL representatives. This was further communicated at a public sensitisation and consultation meeting on 11th November, 2017 in Foinda village. The cut-off date coincided with the start of the household and asset survey. The cut-off date was widely communicated in local dialects.

7.3.2 Socio-economic baseline and asset inventory surveys

As detailed in section 5, *Socio-economic, Census and Asset Inventory Surveys* were undertaken covering 100 per cent of the households affected. The census helped determine who is eligible for compensation and assistance, and discourage ineligible persons, such as opportunistic settlers, from claiming benefits. The asset inventory is a process for registering all land and assets present in the affected area at the cut-off date. The asset inventory identified and recorded all affected assets, including:

- land, by type (residential, agricultural, commercial);
- residential structures (houses, apartments, informal dwellings);
- non-residential structures (barns, court barray, outside toilets, storage facilities, fences);
- other physical assets (non-moveable assets such as trees, standing crops);
- private enterprises (barrays, shops, workshops, stalls);
- communal assets such as common resources (woodlands), public structures (schools, communal water points) and cultural property (burial grounds, sites of religious or historical significance; bondo house)

Table 7.1 Breakdown of assets to be replaced at the new site

Item no.	Name of structure	Dimension of plot (m)	Number of structures
1	five bed room house	27.43 x 21.34	3
2	four bed room house	22.86 x 18.29	8
3	three bed room house	22.86 x 15.24	38
4	two bed room house	18.29 x 15.24	66
5	three classrooms school		1
6	community market		1
7	mosque		1
8	school latrine		3
9	latrine and bath		115
10	Kitchen		115
11	Water well with hand lever		2



Fig 7.1 Typical structures to be replaced (Foinda Primary School left; typical house right)

7.3.3 Household and individual entitlements agreement

Meetings are being held with project-affected households (PAH) and other key stakeholders to review household entitlements and house/plot plans. This will result in a formal agreement with details of each household's entitlement signed by PAHs, post-relocation. The following procedures will be followed ensuring transparency and fairness:

- agreements will include a list of all affected assets, photographs of the old buildings. Survey and plot plans in new community and design of new structures;
- agreement documents to include time frame for payments, method of payment and any other relevant conditions;
- it is not unique for disputes or disagreements to ensue but efforts will be made with the support of the local traditional leaders and other key stakeholders to address such;

- the SRL grievance redress mechanism can be accessed by project affected persons or communities. If there are valid reasons and practicable opportunities, options will be negotiated and selected, to produce the final version of the entitlement agreement;
- the compensation payment agreement was drawn up, agreed and signed for each individual household; and
- records will be kept and processed for subsequent payment at a date and venue that SRL will agree with project-affected persons or communities.

7.4 Paying compensation

For the payment of compensation, the following will be adhered to:

- SRL will ensure that, as part of the consultation and engagement process, those eligible for compensation will be given advance notice of the date, time, and place of payment through stakeholders' meetings;
- SRL shall provide the displaced person with letterhead SRL Agreement signed by SRL authorised signatory and project-affected households and individuals, detailing what payments, title deeds if applicable, assets; and
- SRL acknowledges that all compensation payments be made prior to the commencement of physical resettlement.

7.5 Replacement housing

The provision of replacement houses for the Foinda project will be made in accordance with the following:

- No household will be moved by the project prior to replacement or without suitable housing been made available.
- Replacement houses will be built at the pre-determined host resettlement site. This helps keep communities together and maintain social cohesion and networks.
- The size of new houses were based on the size of existing structures being replaced, as a minimum.
- SRL contracted a construction firm to build the dwelling structures and communal assets.
- All houses are constructed from new materials and/or recycled materials of acceptable quality.
- All houses have a ventilated pit latrine away from the house with sits instead of squatting as requested by PAHs. This was in consideration of vulnerable people with physical challenges to squat. The VIP latrines will have a concrete base (or other suitable manufactured floor), gum poles and proper roof but the walls are of concrete brick.

- In terms of the replacement of other household structures (excluding main structure and toilet), SRL will consider providing reasonable materials and labour assistance to reconstruct kiosks, livestock pens and shrines. Cash compensation for these structures have been negotiated as project-affected people were given the option.
- Transport will be made available by SRL for each household to adequately move the family and belongings to their new residence. Re-settlers will be able to remove temporary structures from the old dwelling to their new one. This material may include roofing materials, structural wood, reeds, doors and window frames, livestock, food, seed, planting materials and personal effects. If already compensated for in cash, they cannot move from the old site.
- The project will not be liable to pay for, nor assist with the transport of any brick or mortar taken from the old houses.

Table 7.2 Construction standards

Structure	Building Materials
Standard house layout	Bedroom(s), parlour(sitting room), verandah, kitchen and shower room attached but separated from main structure and a kitchen
Walls	5" solid sancrete (concrete) with block walls
Footings(foundat ion)	Plain in-situ concrete poured against faces of excavation
Floor	4" plain in-situ concrete laid on compacted hard core (ball stone-smaller pieces of sedimentary rocks) with trowel finish (No tiling)
Roof	Standard Corrugated Iron roofing sheets (Zinc)
Ceiling	Cilotex/plywood with strips in all areas; painted
Windows	Fixed wooden windows provided with framed. Framed hinged mosquito netting
Doors	Wooden panel doors with mortise lock
Shower room	Same wall finishing detached from main structure Non-slip trowel finish to in-situ Deep-line soakaway at the back
VIP Latrines	Area separated from shower room by brick wall. Detached from main house. Latrine with sitting facility
Kitchen	Constructed away from entry door and one window made of wood as per main house. No mosquito netting to window. Super structure wall plastered and painted.

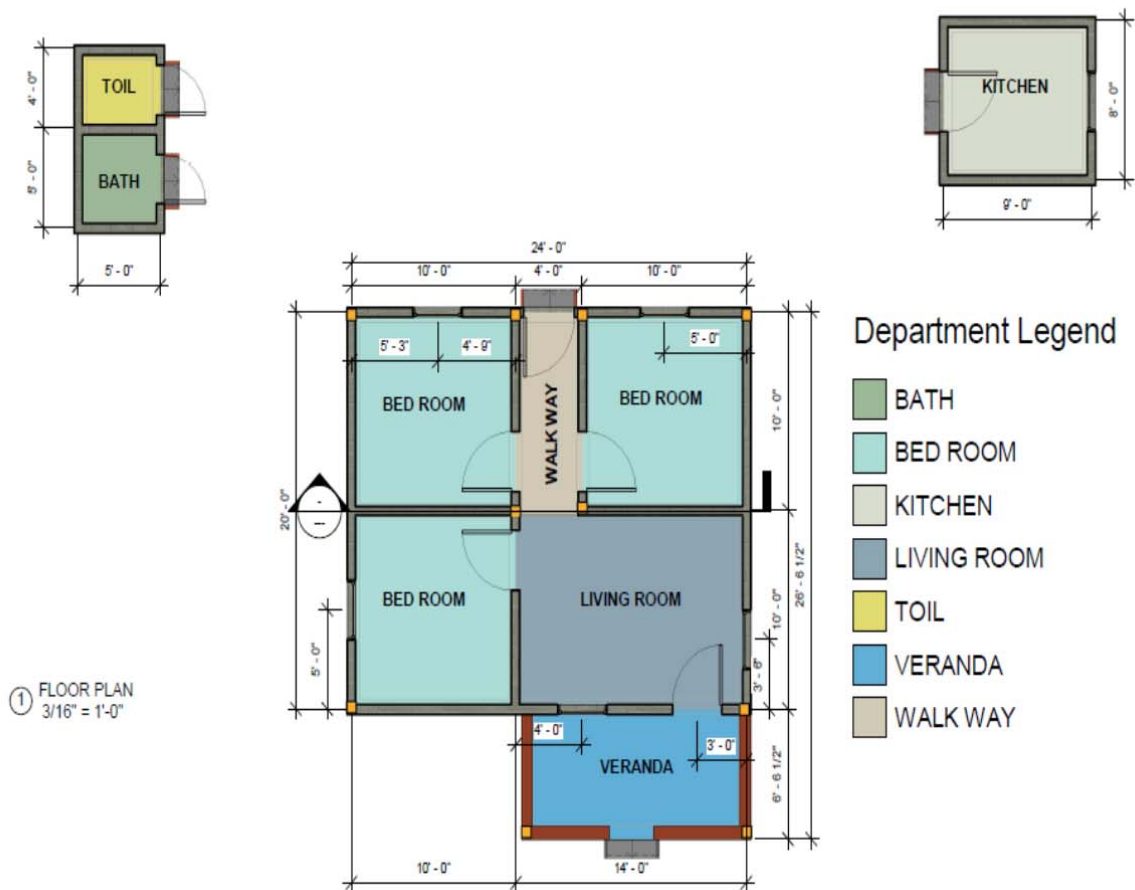


Fig 7.3 Proposed front view of a four-bedroom house

7.5.1 Replacement houses post resettlement

Once people have relocated to the replacement houses, the following is applicable and will be clearly documented in a signed agreement with all households receiving a replacement house:

- Re-settlers will agree to forego all claims and rights in relation to the previous homestead. The household head shall be provided with a document to sign to this effect. All trees and materials left at the old homestead site then become the property of the SRL following the payment of compensation and the relocation of the household.
- After taking occupancy, the re-settlers, jointly with the resettlement project engineer, will audit and compile a list of building defects, if any. SRL has agreed for the contractor to provide 12 months defect period. Normally, this guarantee covers the structural integrity of the house, base, walls, toilet building and roof only.
- SRL will not be responsible for structural problems arising from neglect and or intentional damage, normal wear and tear or as a result of modification to any part of the structure.
- Salvage of materials from old houses (including dismantling) will be allowed for a limited period of not more than a week to ensure timely demolition of old structures.
- For partially built cement brick/block/mud houses to window level, SRL will replace with a new house. It may compensate in cash for houses at early construction stage, provided this commenced before the cut-off date. The amount of compensation will be calculated on the value of the materials in the structure and plus the value of labour.

7.6 Communal Assets

7.6.1 Relocation of graves and sacred sites

Graves (cemeteries), sacred sites and places of worship are recognised as communal assets. SRL will support the following approaches to addressing the displacement of these:

- Project affected persons or communities and key stakeholders were consulted on the relocation of the cemetery in Foinda.
- The option to re-bury their deceased at their new site or within the land provided for as cemetery was explored
- SRL is committed to commission and fund the Sierra Leone Ministry of Health and Sanitation specialist team, to undertake all removal and re-burial as required by safe health practices in SL. Strict customary protocols must be respected and observed
- Project affected community unanimously expressed that they do not wish to identify graves neither support its relocation. They requested SRL to provide the resources required for the pouring of libation ceremony (appeasement of the dead) to be conducted before their move

to the new site. Foinda community expressed also that in the event that human remains are identified whilst SRL is undertaking any mining activities on the cemetery after the appeasement, they (SRL) must transfer the remains to their new cemetery.

- In terms of communal sacred sites or cultural heritage, a process for appeasement of disturbance of the site and potentially the establishment of a new site has been negotiated between SRL and affected communities and stakeholders. The Poro society site was relocated by members on 29th April, 2018 and SRL covered all cost directly related to the ‘appeasement’ process.

SRL maintains a procedure to manage cultural and traditional issues. To avoid, mitigate and manage impacts on assets of cultural significance (including both archaeological; sacred and oral tradition sites) SRL will always consult with the communities, paramount chief and Sierra Leone Government/ Regulatory Agencies where applicable.

7.6.2 Other communal assets

Other communal assets will be replaced at the new FM site. These include at Foinda: a primary school building with two separate sets of toilets; two hand pump water wells and two locally dug wells; a small mosque; and a Bondo (secret society) House. There are no communal barracks, church or other infrastructure.

7.7 Compensation for loss of business

For the valuation of the loss of an enterprise, its function, intensity of use (average monthly income), location importance and its market catchments will need to be determined. The assessors’ valuations are normally based on the cost of re-establishing the commercial activity at a new location. This may include costs for the following:

- acquisition of new land based on existing land arrangement by project affected person;
- material and construction costs of replacement structures (this may involve rebuilding the structure or providing cash compensation); and
- compensation for lost income during the resettlement period, including the time taken to re-establish the same income stream (based on any evidence of monthly income).

The impact on enterprises in Foinda are limited and SRL will ensure adequate support is offered to help grow small and medium enterprises through its livelihood restoration plan.

7.8 Crop compensation

SRL’s aim is not to disturb or destroy farmland and ‘bushes’ so that communities will maintain their social and economic livelihoods. In the event this is not achievable, such disturbance or destruction

will be minimized as much as practically possible. SRL's key principle for crop compensation is for the community to retain as much of their land with safe access for their continued agricultural and farming activities without obstruction to SRL mining operations. This principle is aligned with Sierra Leone law and IFC Performance standard 5 on Land Acquisition and Resettlement.

- **The IFC guidance (2012 PS 5, GN 5) requires companies to: “improve, or restore, the livelihoods and standards of living of displaced persons” and notes (IFC 2012, PS5, GN11) that:**

“compensation alone does not guarantee the restoration or improvement of the livelihoods and social welfare of displaced persons and communities. Restoration and improvement of livelihoods often includes many interconnected assets that may include access to land (productive, fallow, and pasture), marine and aquatic resources (fish stocks), access to social networks, access to natural resources such as timber and non-timber forest products, medicinal plants, hunting and gathering grounds, grazing and cropping areas, fresh water, as well as employment, and capital. Major challenges associated with rural resettlement include restoring livelihoods based on land or natural resource use and the need to avoid compromising the social or cultural continuity of affected communities, including the host communities to which the displaced population may be resettled”.

- **Section 33. (1) of the Mines and Minerals Act 2009** states that,

‘The owner or lawful occupier of any land which is within an area that is the subject of a mineral right shall retain the right to graze stock upon or to cultivate the surface of such land in so far as such grazing or cultivation does not interfere with the proper use of such area for reconnaissance, exploration, or mining operation’.

- Where applicable, any crops disturbed for the purposes of land acquisition will be compensated for in accordance with the rates and required processes set by the Ministry of Agriculture and Food Security(MAFFS) and all SRL Policies.
- Undisturbed land, farm plots and ‘bushes’ that can be accessed safely, without interference to SRL’s operation and within reasonable distance for farmers will not be compensated for.

7.9 Entitlement matrix

The entitlement matrix process and principles, defining types of loss and compensation required and entitlement attached is presented below.

Considerable time is been given for project affected people to engage in and participate on the finalization of the entitlement matrix for Foinda. The entitlements matrix disclosure process forms part of the stages of engaging and consulting with project affected persons to enable them understand fully the entitlements being presented to them.

SRL aims to ensure that community comments arising from the public disclosure event are documented and amendments made to the entitlements matrix to reflect such comments, as may be relevant and practicable.

Table 7.1 FOINDA RESETTLEMENT PROJECT: ENTITLEMENT MATRIX

AFFECTED ASSETS OR RIGHTS	Landowning Resident/Homeowner	Non-landowning Resident/homeowner	Residential Tenants	Community
Land, plot, farmland	At the time of the census, be recognized by local community, authorities or formal or informal land concessionaire as the bona fide tenant or occupant of the affected agricultural field. Replacement land at new site or cash compensation. Could be entitled to annual surface rent payments for land.	Replacement land at new site or cash compensation	N/A	Cash/replacement compensation for communal land where applicable, Paid to Paramount Chief
Primary structure (residential)	Replacement house at host site. SRL will construct new houses for affected people	Replacement house at host site. SRL will construct new houses for affected people.	Basic support determined by SRL, example two months' rent payment for rented accommodation within Chiefdom where eligible. Intra-household tenancy or intra-household free of charge occupation is not eligible (e.g., somebody declaring their children or other household members as free tenants while such children belong to the same household)	N/A
Secondary structure (kiosk, pens)	Asset assessed by Independent Valuator, then cash compensation payment. SRL will consider the option of facilitating the replacement of these assets if requested by affected owners	Asset assessed by Independent Valuator, then cash compensation payment. SRL will consider the option of facilitating the replacement of these assets if requested by affected owners	Asset assessed by Independent Valuator, then cash compensation payment. SRL will consider the option of facilitating the replacement of these assets if requested by affected owners	N/A

Farms, crops, trees, livestock	<p>Cash/seedlings compensation after assessment. At the time of the census, be recognized by local community, landowner, and/or resettlement committee as the bona fide owner of an affected annual and or perennial crops, regardless of land ownership status</p> <p>Livestock will be appropriately transferred to new settlement</p> <p>SRL's livelihood restoration program will contribute towards mitigating this impact</p> <p>Compensation for deprivation of use of land is paid through surface rent process</p>	<p>Cash/ seedlings compensation after assessment At the time of the census, be recognized by local community, landowner, and/or resettlement committee as the bona fide owner of affected crops, regardless of land ownership status</p> <p>Livestock will be appropriately transferred to new settlement</p> <p>SRL's livelihood restoration program will contribute towards mitigating this impact</p>	<p>Cash/seedlings compensation after assessment. At the time of the census, be recognized by local community, landowner or resettlement committee as the bona fide owner of affected farm regardless of land ownership status</p> <p>Livestock will be appropriately transferred to new settlement</p> <p>SRL's livelihood restoration program will contribute towards mitigating this impact</p>	<p>Compensation applicable for any communal farm or ownership of crops and or economic trees</p>
Relocation transport	Will be provided transport to new site	Will be provided transport to new site	Will be provided transport to new site	N/A
Communal Assets (water well, school, mosques, etc.)	Will be replaced	Will be replaced	Will be replaced	Will be replaced
Loss of Access to Community Resources including Forests & Woodlands	All resident households. Access to non-affected lands to be maintained. Limited woodland provided at new resettlement site.	All resident households. Access to non-affected lands to be maintained. Limited woodland provided at new resettlement site.	All resident households. Access to non-affected lands to be maintained. Limited woodland provided at new resettlement site.	All resident households. Access to non-affected lands to be maintained. Limited woodland provided at new resettlement site.

Loss of Cultural Sites, Graves, and Shrines etc.	Replace such sites; SRL to commission the Ministry of Health and Sanitation to exhume and relocate graves where required. Traditional Authorities would be involved in all decisions and would prescribe the appropriate methods and procedures to be followed.	Replace such sites; SRL to commission the Ministry of Health and Sanitation to exhume and relocate graves where required. Traditional Authorities would be involved in all decisions and would prescribe the appropriate methods and procedures to be followed.	Replace such sites; SRL to commission the Ministry of Health and Sanitation to exhume and relocate graves where required. Traditional Authorities would be involved in all decisions and would prescribe the appropriate methods and procedures to be followed.	Replace such sites; SRL to commission the Ministry of Health and Sanitation to exhume and relocate graves where required. Traditional Authorities would be involved in all decisions and would prescribe the appropriate methods and procedures to be followed.
Loss of primary income source for individuals making a living through activities other than farming	<p>Livelihood Re-establishment</p> <p>Alternative Livelihoods Training and Assistance</p> <p>Assistance to re-establish business or other economic activity at the new resettlement community.</p> <p>Alternative Livelihoods training and support if previous activity is no longer possible or feasible in new location</p>	<p>Livelihood Re-establishment</p> <p>Alternative Livelihoods Training and Assistance</p> <p>Assistance to re-establish business or other economic activity at the new resettlement community.</p> <p>Alternative Livelihoods training and support if previous activity is no longer possible or feasible in new location</p>	<p>Livelihood Re-establishment</p> <p>Alternative Livelihoods Training and Assistance</p> <p>Assistance to re-establish business or other economic activity at the new resettlement community.</p> <p>Alternative Livelihoods training and support if previous activity is no longer possible or feasible in new location</p>	N/A
Assistance to vulnerable groups such as the elderly, ill; with disability	<p>Only vulnerable households - additional assistance as required to ensure no negative impacts.</p> <p>SRL will put in place a detailed program to identify and assist all vulnerable persons and households.</p>	<p>Only vulnerable households - additional assistance as required to ensure no negative impacts.</p> <p>SRL will put in place a detailed program to identify and assist all vulnerable persons and households.</p>	<p>Only vulnerable households - additional assistance as required to ensure no negative impacts.</p> <p>SRL will put in place a detailed program to identify and assist all vulnerable persons and households.</p>	N/A

8 Organizational and implementation structure

8.1 Introduction

This section describes the organizational arrangements in place, including the newly established Resettlement Management Unit, to implement the Foinda Resettlement Project. SRL is responsible for the planning and implementation of the Resettlement Management Plan, in consultation with the Foinda Resettlement Committee; Chiefdom Resettlement Committee; Inter-ministerial Resettlement committee and with the Bonthe District Council. Guidance will be sought from other key stakeholders such as the Provincial Secretary (PS); National Mineral Agency; the Human Rights Commission and Civil society organisations.

The IFC (PS 2012, Guidance Note 5, GN 26 p. 11) states that:

“Effective resettlement planning requires regular consultation and engagement with a wide range of project stakeholders.While the establishment of resettlement committees can support the resettlement plan and communication efforts, steps should be taken to ensure that all potentially displaced people are informed and invited to participate in decision making related to resettlement”.

8.2 Resettlement team

The SRL Resettlement Unit (RMU), headed by a Resettlement Manager, is located within the overall management structure of the operation and reports directly to SRL CEO. This unit will be responsible to coordinate, manage, and monitor the practical day-to-day implementation of all SRL resettlement activities, including the Foinda project. S/he will supervise all project staff members assigned resettlement tasks, as well as coordinating consultants and contractors and managing relationships with any other agencies, such as Non-Government Organizations (NGOs) and Community Based Organizations (CBOs) involved in SRL resettlement-related activities.

The SRL RMU currently includes the following dedicated roles:

The **Resettlement Manager**, acting as the Project Manager for the Foinda Resettlement Project, has operational and technical responsibility for resettlement planning and implementation, including the following specific programme components:

- plan and supervise all resettlement related studies and surveys;
- support establishment and maintenance of village resettlement committees;
- plan and supervise compensation and livelihoods activities;
- co-ordinate selection of resettlement sites;

- monitor and report on the construction of replacement village structures;
- plan and co-ordinate the move into replacement housing for affected parties;
- conduct on-going consultation and communication with affected parties and direct liaison; between key stakeholders, including the government and SRL;
- plan and supervise all monitoring activities;
- work closely with and be supported by the CAD and community relations managers;
- responsible for managing all proposed and approved changes to the communications plan; and
- update all project plans and supporting documentation, and distribute to the team and relevant stakeholders (internal and external) as may be required.

The RMU has engaged a **Livelihood and Monitoring & Evaluation Officer** to lead all livelihood support programmes related to Foinda. The Livelihood specialist will develop a Livelihood Restoration Plan in consultation with PAP; the Resettlement Manager; Community Affairs Manager and SRL CEO. He/she will also support the design and implementation of monitoring and evaluation activities.

The **Resettlement Project Engineer**, reporting to the RM, leads on the design and provision of construction documents for the construction of the Foinda Resettlement Project. He/she will be responsible from commencement of the bidding phase through the completion of construction and post-construction audit. The Resettlement Project Engineer will:

- be SRL's liaison and support with the contractor(s). During the Request for Proposal (RFP), contractor selection, construction phases the Resettlement Project Engineer makes technical decisions regarding the work and performs the overall construction administration with the approval of the Resettlement Manager;
- oversee all project construction plans and specifications, as well as the general contractor's operations at all times;
- maintain an effective working relationship with the community stakeholders, contractor(s), and the project manager;
- adhere strictly to all SRL policies and approved practices - Environmental Health & Safety; Stakeholder Engagement Plan; Cultural practices and needs of the communities;
- ensure that all inspections and audit required by the contract documents are completed and is required to certify that the project is completed in accordance to the contract documents.
- submit weekly and monthly written reports to the Resettlement Project Manager, to reflect new and unresolved issues, schedule, quality control, submittal review, budget control including contingency balance, and any other pertinent issues. The Project progress reports shall reflect completed work versus contract time;

- check the contractor's estimate of work completed for partial payments based on the approved cost breakdown;
- monitor progress schedule to reflect work completed vs. actual time;
- advise the Resettlement Manager, the Chief Executive Officer of circumstances surrounding requested changes in the work and recommend action;
- maintain daily diary describing general events, noting problems and unusual events, resolution, decisions and directions given to the contractor as stated in the contract;
- complete and transmit the Project Closeout Checklist to the Resettlement Project Manager for review;
- approves or recommends approval of all required tests, materials, equipment, schedules, substitutions of materials, colours, textures in line with SL Regulations and Standards; and
- undertake additional duties as required.

A **Community Relations Officer** has been assigned temporarily to the RMU for the duration of the project to do the following:

- serve as the primary point of contact between communities of the area and the project.
- manages consultation and negotiations with affected communities and facilitate public meetings
- sensitise project-affected households on compensation process and policies,
- monitor grievances and report issues to project management and at time resolve practical problems.

Due to the nature of their roles, The Community & Rehabilitation Manager (CRM); Resettlement Manager (RM) and Community Relations Manager-Sembehun Haul Road Project (CRM) will help support the resettlement team to deliver the Foinda Resettlement Project scheduled to be completed by 31st July, 2018.

SRL Mine Planning Department

The SRL Mine Planning Department has previously actively participated in undertaking surveys including house and crop assessments relating to resettlement. The department will continue to support similar activities such as survey and preparing crop assessment maps, GIS points and aerial imagery.

8.3 Proposed role of Government of Sierra Leone

It is anticipated that the Government of Sierra Leone (GoSL) will act as the primary support agent to SRL resettlement program. SRL has started initial engagement with the Environment Protection

Agency SL (EPA), to support the creation of an Inter-Ministerial Resettlement Committee. This committee will provide advisory and monitoring support to SRL on all resettlement related activities.

SRL notes in the EPA (Mines Regulation) 2013, the proposed establishment of a new inter-ministerial committee entitled the “Resettlement Committee” dealing with resettlement related issues. SRL will work with this committee once established in accordance with the provisions contained in any law relating to the resettlement of local communities and to further implement the objectives of Section 38 of the Mines and Minerals Act 2009.

In addition, SRL expects the government to meet its obligations as set out in the Sierra Rutile Agreement (Ratification) 2002 and any other relevant support as noted below.

- ensure that they include the affected communities in all national and regional development Plans
- establish structures and get them to function effectively as EPA Regulation and MMA 2009 require of them
- provide any technical guidance as required and support SRL in ensuring that the moratorium or cut-off-date for resettlement is observed.
- ensure compatibility of the resettlement process with overall development visions for the area such as the Local District Development Plans; Agenda for Prosperity; United Nations (UN) Sustainable Development Goals (SDGs) .
- send a representative to local meetings to monitor proceedings, provide guidance and make input as and when required.
- support SRL in all land acquisition and compensation negotiations as required
- ensure security of tenure is provided for each relocated household and house owner.
- ensure standard compensation rates set by MAFFS are fair to both SRL and PAP

9 Stakeholder engagement and consultation strategy

9.1 Introduction

A detailed Stakeholder Engagement Plan (SEP) is in development to provide detailed stakeholder identification and engagement plans. This section provides preliminary detail SRLs approach to engagement and the mechanisms established thus far for communication and engagement specific to the Foinda Resettlement Project.

For the purposes of this plan, a stakeholder include any individual or group that feels that it is going to be affected by the Foinda Resettlement Project, such as the affected community and any individuals or groups that may impact on the Project, be it in a positive or negative manner. For resettlement planning, the most important stakeholders are those persons and households directly impacted by the SRL Project. In this context, it is Foinda Village.



Figure 9.1 Women participating at a resettlement meeting at Foinda

9.2 Objectives

The key objectives of an effective stakeholder engagement are to:

- establish a trusted process for consultation and engagement with stakeholders;
- develop and maintain an up-to-date understanding of the characteristics and issues of concern of the local community and the impact of the project on them;
- ensure regular and open communication about project activities
- provide a means of on-going monitoring and reporting of activities.
- ensure SRL meets GoSL regulatory requirements as well as Good International Industry Practice(GIIP) such as the IFC Performance Standards

Stakeholder engagement includes stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, stakeholder involvement in project monitoring, and reporting to stakeholders. SRL aim to integrate a range of stakeholder-engagement

approaches that can help build trust and contribute to maintaining broad community support for the project.

9.3 Guiding Principles

In line with current international good practice, stakeholders engagement as part of this project will ensure that consultation and communication with all stakeholders,

- is free, prior and informed;
- is free of discrimination, manipulation, interference, coercion and intimidation
- takes place prior to decisions being made so that views expressed can be taken into account;
- is conducted on the basis of timely, relevant, understandable and accessible information;
- is undertaken in a culturally appropriate manner;
- includes all those interested in or affected by the Project with special attention to vulnerable groups;
- achieves a two-way dialogue; and
- is responsive, and includes explicit mechanisms for receiving, documenting and addressing comments, grievances and feedback

9.4 Managing stakeholders' expectation

Engagement with stakeholders at all levels has revealed that the Project will need to closely manage stakeholders' expectations. Many stakeholders believe that a Livelihood Plan is an exercise that will provide additional cash compensation above that originally paid and is a 'hand-out' package. A significant component of engagement was therefore dedicated to clarifying that there would only be recalculation of compensation to meet replacement value. Extensive engagement will continue to explain what constitutes a livelihood restoration programme and continue to manage expectations. Different methods and tools will be utilised, some of which are presented below.

9.5 Resettlement committees

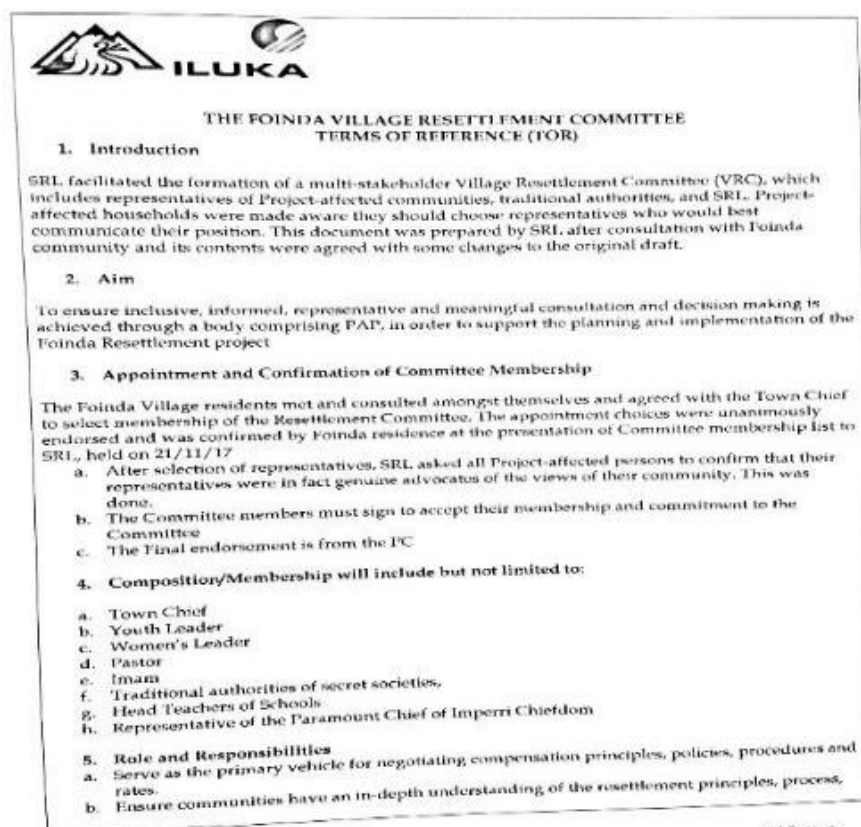
9.5.1 Village Resettlement Committee

A Village Resettlement Committee is established by Foinda community and supporting the relocation process to address issues associated with the relocation of the village and payment of compensations. The committee serves as a focal point for consultations on the types of assistance proposed by SRL as well as for subsequent participation of the community in RMP implementation. See below for the signed and approved Terms of Reference.

Specific activities and responsibilities of the Village Resettlement Committee includes the following:

- Provide a mechanism for local input into the resettlement plan and will help oversee the implementation of the implementation plan.
- Agreement of a new village layout;
- Input into the design of replacement housing at the new village site and agreement with SRL of the design;
- Participation in the discussion of new compensation rates for crops and trees;
- Regular and on-going discussions with affected residents of affected villages including host communities regarding the status of the resettlement process
- Solicit feedback and identify any concerns or grievances that need to be addressed as well as help address them.



Figure 9.1 Foinda Village Resettlement Committee Terms of Reference documents



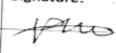
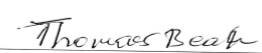

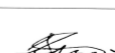

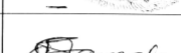

- components and development of the Resettlement Plan, and facilitate increased understanding of these elements among community members.
- Strengthen partnership and cooperation between the Company and the representatives of Foinda people.
 - To resolve contentious resettlement issues, maintain focus on complex issues, solve problems, and assess individual complaints on a case-by-case basis.
 - Make complaint/grievance against SRL on behalf of the Committee and Foinda residents
 - Assist with site selection planning and preparation for resettlement village, as well as the monitoring of construction work.
 - To ensure legitimate Project-affected households and the Company would have a guaranteed, fair and adequate compensation process.
 - Review of resettlement house designs, plot and infrastructure layout
 - Determination of eligibility for some compensation and support the ongoing crop assessment and asset survey activities
 - Management of speculative construction of structures, ensuring immovable assets that were constructed or planted after the entitlement cut-off date are not eligible for compensation.
 - Make recommendations and retain key decisions for discussion with the Chiefdom Resettlement Committee.
- 6. Operation of the Committee**
- The Foinda VRC has two secretaries who prepare meeting Minutes. The Company circulates the Minutes and a proposed agenda for the next meeting. The Minutes sometimes have attachments e.g. a map of the Mine Area, agreed crop, house design and plan.
 - Foinda VRC Meetings are effectively public. Some meetings would be held behind closed doors.
 - Representatives were encouraged to keep their constituents informed.
 - Meetings would be held once a week to give representatives ample opportunity to consult broadly with their constituents.
 - Outside the VRC, formal meetings with a broad range of stakeholder groups will continue
- 7. Removing and replacing a member (s)**
- The Foinda community and their stakeholders possess the right to request the removal and appointment of replacement member in the event the said person fails to execute their role and responsibilities judiciously.
 - Such decision must be agreed after a vote or by the decision of the PC.

I confirm that we actively participated in the development of this document and agreed with its contents.

I confirm my membership of this Committee and promise to this document.

Name:	Signature:
Chief Bockarie Jaka	
Julius M Biandome	

3 | Page

Name:	Signature:
Peter O Massagui	
Alpha Massagui	
Thomas Beah	
Mohamed Mbayo	
Jillo Momoh	
Manice Amara	
Foday Sialka	
A'ou G'rouma	
Usman Bagallie	
Desmond Doherty SRL	
ecosta J- Savary SRL	

4 | Page

9.5.2 Chiefdom Resettlement Committee

A Chiefdom Resettlement Committee was established, in accordance with a Terms of Reference (TOR) which was prepared, signed and endorsed by the PC and key chiefdom stakeholders including civil society organisation and the Sierra Leone Police.

THE IMPERRI CHIEFDOM RESETTLEMENT COMMITTEE TERMS OF REFERENCE (TOR)

1. Introduction

The formation of a Multi-stakeholder Imperri Chiefdom Resettlement Committee (ICRC), which includes the Paramount Chief Madam Hawa Kpanabom Sokaun IV as Chairperson and other chiefdom key stakeholders. The Chiefdom Authorities had the choice to choose representatives who would best communicate and represent the interest of Foinda. This final document was prepared by the chiefdom Authorities after consultation with its people with support from SRL Resettlement Team.

2. Aim

To ensure inclusive, participatory, inform and meaningful consultation is achieved through a body comprising key stakeholders of Imperri Chiefdom. This will help support the planning and implementation of the Foinda Resettlement Project.

3. Appointment and Confirmation of Committee Membership

The membership of this committee was selected and approved by the Paramount Chief in close consultation with the chiefdom Authorities.

- a. The Committee members will sign this document to accept their membership and declare their commitment to the committee as they support the relocation of Foinda village.

4. Composition/Membership will include but not limited to:

- a. The Paramount Chief – P.C Md. Hawa S. Kpanabom IV.
- b. Chiefdom Speaker - Chief Simeon Amara
- c. Chiefdom Administration Clerk – Thomas P. Farma
- d. Section Chief of Bigo Section – Chief Tommy Baun
- e. Deputy Section Chief of Bigo Section – Maada Yusuf M. Langba
- f. Chairman Council of Town Chiefs – Osman Bangalie
- g. Acting Town Chief of Foinda – Chief Bockarie Jaka
- h. Civil Society Organisation – NGOs
- i. The Sierra Leone Police – LUC Rutile Division

5. Roles and Responsibilities

- a. Serve as highest Authority at chiefdom level, for negotiation compensation principles, policies, procedures and rates.
- b. Ensure Project-Affected people have an in-depth understanding of the resettlement principles, process, components and development of the Resettlement Plan, and facilitate increased awareness among community members.
- c. Strengthen partnership and cooperation between the Company and the stakeholders

9.6 Other communication and engagement tools and methods

In order to achieve the objectives, as set out above, the following tools are being utilised for the project. SRL will ensure that affected stakeholders are consulted and their views solicited to ensure that the appropriate tools are used throughout the project. In all instances, the SRL Media Policy will be adhered to.

a) Dedicated phone line

This line will be available to respond to all resettlement enquiry, feedback and grievance issues. The RM will use this phone and will be accessible from 7am – 6:30pm Mon-Sat. In the absence of the RM, the Livelihood Specialist will handle it.

b) Brochures and other printed materials

SRL will prepare question and answer brochures (Q & A) for resettlement activities to present a concise and easy to understand description of the Project and the resettlement process, as well as the different ways in which to participate in the engagement processes. The brochure will provide contact details for further information, a link to the website, and a comment form, which can be used to submit comments and question.

Print materials will likely be the most frequently used medium to convey messages, especially when engaging with communities. In this instance, materials need to be simple and include explanatory graphics because of low literacy levels. Materials must take into consideration the cultural context, specifically when disseminated, since making materials available to stakeholders might need to follow a pre-established hierarchy / flow.

c) Info-Posts (Public Noticeboard)

Information posts (or “info-posts”) comprise a public notice board where posters are placed, and a letter-box installed in affected villages. Information pertaining to upcoming meetings and any other resettlement notices will be posted on these boards. To ensure this information is shared with those who cannot read English the Community Relations Officers can also explain in the local language the content of these notices to the village elders and authorities.

d) Info-Shops

‘ Info-Shops’ are satellite offices of the Community Affairs Department (CAD) established and staffed by SRL employees who explain the Project to any interested parties, and respond to any grievance, enquiries and feedback made by community members.

e) Social Media

Social media is relatively new in SL, with WhatsApp being the most popular app currently in use. The project's RM may use WhatsApp to communicate with stakeholders when appropriate.

f) Local Radio

SRL will utilise local radio stations, when appropriate, to disseminate information on the project. Local radio has been used thus far to provide information on meetings.

g) Focus group meetings

The aim of a focus group is to pull together stakeholders with the same interest into a single meeting to discuss issues of specific interest to the group. Meetings usually have a very specific objective which is aligned with the expectations and interest of the stakeholders present.

h) Workshops

Workshops are ad-hoc outcomes based meetings and seek to find solutions for specific issues facing the environment, social aspects and the project. In many instances, issues identified through the ESIA process or Grievance process will be tabled at such a workshop.

i) Formal Letters

Alternatively, it could be used as a formal method for request or sharing of information. Stakeholder meetings are arranged by means of formal letters being submitted by hand.



Figure 9.3 SRL Livelihood Officer consulting with women of Foinda

Records of all engagement activities are maintained for the project.


RESETTLEMENT UNIT					
					
Date	Venue	Purpose	Key stakeholders present	Activities/discussion	Outcome
10/11/17	Residence of PC Madam Hawa of Imperi Chiefdom	Inception meeting on Foinda relocation and declaration of cut-off date	Paramount Chief(PC), Speaker, Acting Chief of Foinda and all Chiefdom stakeholders; SRL/Iiluka COO, Community Affairs Manager and Resettlement Manager	Formally informed stakeholders that Foinda will be relocated Agreed declaration of cut-off date (10/11/17) and sensitisation of affected people	Stakeholders expressed joy; thanked SRL Agreed for PC to meet with Foinda residents on 11/11/17 to inform them and confirm cut-off date
11/11/17	Foinda Village	Relocation of Foinda: kick-off meeting with all residents	PC, Speaker, Acting Chief of Foinda and all Chiefdom stakeholders; Civil Society representative – Network Movement for Justice and Development, SRL/Iiluka COO, Community Affairs Manager and Resettlement Manager	PC informed community about the planned relocation of Foinda; confirmed and sensitized on the cut-off date Informed residents that Socio-economic, census and asset inventory study will commence on 14/11/17	Well received by residents with some concerns about livelihood needs
14/11/17	Foinda Village	Public meeting - pre-household and asset survey (HHAS) meeting with community	Residents of Foinda; Section Speaker, Acting Chief of Foinda	Pre-household and asset survey (HHAS) meeting with community	Committee endorsed AHIs to start. Survey commenced immediately after the meeting.
16/11/17	PC's Residence	Update meeting for PC and stakeholders	PC	Update meeting for PC and stakeholders	PC noted that she does not want some contractors to be involved who have delivered poor services in the past
18/11/17	Foinda village – Public meeting	To thank stakeholders and residence for their active participation in the study and inform on next step	Residents of Foinda including the town Chief	Completion of socio-economic, census and asset inventory fieldwork exercise – to thank the stakeholders and residents of Foinda for their support and corporation during the exercise and their warm hospitality	The Acting town Chief expressed joy that the Foinda people will be finally relocated.
20/11/17	Madina Village(FM) – Public meeting	Consultative Meeting on Foinda relocation	Chief of Madina; Residents of Madina	Formally informed residents about Foinda relocating to their area; their views; impact envisaged; concerns; mitigating measures.	Madina community were happy about the relocation of Foinda. Concerns were raised to rehabilitate their own houses. They requested for the construction of toilets, kitchen, to repair their zink and provide land for agricultural farming.
27/11/17	Foinda village	Foinda village resettlement committee inception meeting	Foinda Village resettlement committee. See attachment list in appendix xxx	Consult on developing terms of Reference for the Committee	Further consultation
02/12/17	Foinda village	Foinda village resettlement committee meeting		Consultation with stakeholders on new village layout and house designs;	To plan site visit

Figure 9.4 Sample engagement records

10 Livelihoods support strategy

10.1 Introduction

The Foinda Resettlement Project will be undertaken as a sustainable development initiative, as prescribed by IFC PS5. This chapter presents a summary of the Livelihood Restoration Plan for Foinda Village. The full Livelihood Restoration Plan will address the impact of economic displacement and disruption of livelihoods of Foinda residents.

This chapter sets out the livelihood restoration and other community development initiatives designed to mitigate the negative impacts of economic displacement, and where possible improve livelihoods. The IFC guidance (2012 PS 5, GN 5) requires companies to: *“improve, or restore, the livelihoods and standards of living of displaced persons”* and notes (IFC 2012, PS5, GN11) that:

“compensation alone does not guarantee the restoration or improvement of the livelihoods and social welfare of displaced persons and communities. Restoration and improvement of livelihoods often includes many interconnected assets that may include access to land (productive, fallow, and pasture), marine and aquatic resources (fish stocks), access to social networks, access to natural resources such as timber and non-timber forest products, medicinal plants, hunting and gathering grounds, grazing and cropping areas, fresh water, as well as employment, and capital. Major challenges associated with rural resettlement include restoring livelihoods based on land or natural resource use and the need to avoid compromising the social or cultural continuity of affected communities, including the host communities to which the displaced population may be resettled”.

In order for the Project to fulfil its objective that persons displaced by the Project at least restore their income-earning capacity; income restoration is of critical importance. In particular, the income restoration plan will ensure that vulnerable groups are supported to succeed in the post-implementation phase.

10.2 Livelihoods background

SRL has always acknowledged the importance of contributing to the development and general well-being of local communities. According to the Foinda Village 2002 RAP,

“...Since 1982, SRL has had a policy and a program in place to assist both those villages requiring relocation and others within the mining area. With the adoption of the Sierra Rutile Act in 1989, SRL formalized their policies and programs into the Environmental and Community Development Program for the Sierra Rutile Mining Area. The projects described in the program included crop and animal improvement schemes, including CARE’s gardening program, tree crop nurseries and animal (livestock) rearing, as well as a loan scheme for farming, small businesses and purchase of

appropriate technology equipment. Assistance was provided towards repairs or reconstruction following natural disasters such as storms and SRL sponsored several projects by others including the joint CARE/Ministry of Energy and Power Rural Water and Sanitation Project and the CARE Sustainable Agriculture and Village Extension (SAVE) Project.

10.3 Livelihood restoration principles

The Foinda Resettlement Project will be undertaken as a sustainable development initiative, as prescribed by IFC PS5. Its key aim is to support PAHs/PACs achieve self-reliance to meet essential needs and to enjoy social and economic rights in a sustainable manner and with dignity.

SRL recruited the services of a Livelihoods and M&E specialist to manage the development and implementation of a Livelihood Restoration Plan for Foinda.

While respecting all applicable national laws and IFC Performance Standards, the following principles are being applied by SRL in planning and delivering livelihoods restoration programs for the Foinda project:

- consulted with the affected groups and assess their needs prior to planning any income restoration plans;
- provided adjusted measures where necessary to support vulnerable people whose daily income and livelihood sources are at risk;
- encouraged participation by all affected groups (including women), local NGOs and CBOs;
- allocated sufficient resources and budget;
- prepared to stay for a longer time period - definitely beyond the project construction cycle - to implement, monitor and follow up on income restoration activities;
- remember that resettlement is a development activity;
- developed multiple options for income restoration (e.g., replacement land, employment, business, community enterprises, training and skills development) based on an assessment of existing income-generating patterns;
- developed special measures for the displaced persons who are disadvantaged in terms of income generation and employment. this should include establishment of women-centred income generation activities;
- coordinated livelihoods planning with physical resettlement and the choice of resettlement locations;
- consulted women and women's groups and establish women-centred income generation activities; and
- considered both short- and long-term strategies for effective income restoration plans.



Figure 11.1 SRL Livelihood Officer having consultation meeting with women of Foinda

10.4 Approaches to livelihood restoration

Livelihood restoration will include provision of appropriate technical training, institutional capacity building, mentoring and advice to the affected community, in order to help them re-establish and enhance their livelihoods. There are three approaches to livelihood restoration that will be adopted by the project:

Land-based livelihoods: land-based resettlement strategies for displaced persons whose current livelihoods are land-based. This will include providing assistance with acquiring or accessing replacement land; physical preparation of farmland; agricultural inputs (seeds, tools and implements); veterinary care; access to credit; and transportation.

Wage-based livelihoods: where displacement has caused wage earners to lose their jobs, assistance in finding new employment may be required. This will include providing wage earners with assistance with training or finding jobs, compensation for loss of wages. Other activities may include micro-finance schemes.

Enterprise-based livelihoods: entrepreneurs whose businesses are impacted may require help with credit or training to establish or expand their businesses in a new location. This will include providing or arranging access to credit or training. SRL may be able to further assist by increasing on the procurement of goods and services in promoting local contents

SRL will give preference to restoration of existing livelihood activities. Subject to consultations with the affected people, livelihood mitigation measures will be planned according to the following hierarchy of preference:

Preference 1. Restoration of existing livelihoods

Generally, the lowest-risk option will be to re-establish the existing livelihoods of the affected people, so that they can continue doing what they know best and what is known to work in the local situation. While the opportunity may be taken to introduce proven enhancements to the existing livelihoods (for example, replacement of fruit trees with locally tested, superior varieties), the emphasis should be on replacing the livelihood assets with new assets of at least equal quality. In this case there is little risk of failure due to technical, economic or social factors. Even if for any reason the affected people choose not to continue their previous activities, it can still be shown that they were provided with all the means to do so.

Preference 2. Intensification of existing livelihoods

SRL will consider the viable option of bringing about a permanent, sustainable enhancement of land use, so that a smaller area of land can be made to produce as much or more than the original land, without requiring additional labour or other costs on an on-going basis. Sustainable intensification of non-land based livelihoods may also be possible. Since any technical intervention is not guaranteed of success in a particular situation, care will be taken to identify interventions for which there are successful precedents under very similar conditions, and having the fewest identifiable risk factors. Consultation, and experimentation through pilot programmes will improve the chances of success and SRL will leverage such technical expertise through partnerships with local and international NGOs providing similar support interventions.

Preference 3. Introduction of alternative livelihoods

In terms of livelihood replacement, the substitution of a new type of livelihood (for example doing business) for an existing one (for example farming) should only be considered when there is no feasible way of restoring the existing means of livelihood. Objectively, SRL is aware that developing new livelihoods carries much more risk of failure than restoring existing livelihoods, or intensifying existing livelihoods. For existing livelihoods, usually the factors needed to maintain those livelihoods can be identified with some confidence. The promotion of alternative livelihoods may be more appropriate under community development programs, which are not intended to mitigate specific economic losses for specific individuals but to support the growth of communities in general. In this case, SRL will support plans for Foinda to benefit from the Community Development Agreement (CDA) interventions.

10.5 Community Development Agreement (CDA)

The “Community Development Agreement” or “CDA” means the community development agreement(s) designed to promote sustainable development and to enhance the general welfare and quality of life of the inhabitants and which, in the case of mining projects shall be entered into pursuant to Section 140 of the Mines and Minerals Act 2009.

- A key requirement of the Mines and Mineral Act (MMA) 2009, is for the development of a CDA by all mining companies.
- In addition, SRL will ensure that PAP participate and benefit from the CDA once it becomes active. A CDA defines all development interventions including livelihood support; agreed between SRL and primary host communities, with government guidance in its development and implementation.

A series of livelihood enhancement initiatives already inform the CDA document. SRL will further explore options drawing on the experience and lessons learned from similar programs. A participatory approach will be adopted and the following thematic areas are being explored:

- fisheries development;
- agricultural assistance;
- technical and vocational skills training and employment;
- financial management training; and
- business development support.

10.6 Measuring livelihood success – key performance indicators

Livelihood performance indicators will be updated once the program is finalized, in consultation with affected persons. Livelihoods programs will be monitored as part of overall project monitoring program. For each affected household that experiences a loss of agricultural or resource land as a result of Project activities, critical indicators will include:

- number and area of active and fallow agricultural parcels worked / owned;
- harvest yields, and the amount and value of agricultural produce consumed and sold;
- condition and quantity of livestock owned, and the condition and quantity of grazing land accessible;
- access to and use of forest resources;
- number of people whose wage and enterprise based livelihoods is affected by the Project, and the proportion of their livelihood / income affected;
- number of people participating in skill training and local employment programs; and amount spent on local procurement.

10.7 Livelihood restoration program closure

The livelihood restoration program be completed when:

- All affected households have demonstrated success in meeting the established livelihood restoration performance indicators;
- The company will commission an external resettlement expert to conduct a completion audit of the Resettlement Plan and Livelihood Restoration Plan to assess whether these performance indicators are met; and
- Completion of any corrective actions identified by the completion audit should bring the SRL's responsibility for livelihood restoration to a close.

11 Grievance management

11.1 Introduction

Sierra Rutile Ltd (SRL) seeks to build strong relationships with stakeholders and manage the impact of its business activities on communities. Nevertheless, it recognises that complaints will occur from time to time.

IFC (PS 2012, Guidance Notes 5, GN 30) notes that;

“Regardless of scale, involuntary resettlement may give rise to grievances among affected households and communities (...). Timely redress of grievances through an effective and transparent grievance mechanism is vital to the satisfactory implementation of resettlement and to completion of the project on schedule”.

SRL introduced a revised local-level process for handling grievances in 2018 as documented in the SRL Grievance Mechanism (a summary of this process is documented in Fig 11.1 over page and the associated Fact Sheet is included in the appendix). This new process will ensure SRL can effectively handle any complaints pertaining to the Foinda Resettlement Project, and it will allow stakeholders or their representative(s) to raise grievances, complaints or concerns with the project and have those addressed in a prompt and respectful manner.

11.2 SRL Grievance Mechanism

Specifically, the objectives of the SRL grievance mechanism are to:

- establish a prompt, consistent and respectful mechanism for receiving, investigating and managing complaints/grievances from stakeholders especially community members
- ensure proper documentation of complaints and any corrective actions taken; and
- contribute to continuous improvement in performance through the analysis of trends and lessons learned.

The updated mechanism reflects the following:

- Iluka’s Group Procedure - Grievance Management
 - This includes a series of Key Effectiveness Criteria adapted from *“The Ruggie Framework (Guiding Principles on Business & Human Rights: Implementing the United Nations ‘Protect, Respect, and Remedy’ Framework)”*.
- The International Finance Corporation (IFC) Guidance for Projects and Companies on Designing Grievance Mechanisms, 2009; Number 7.

It will be revised and updated periodically based on experience and feedback from stakeholders.

11.2.1 Scope

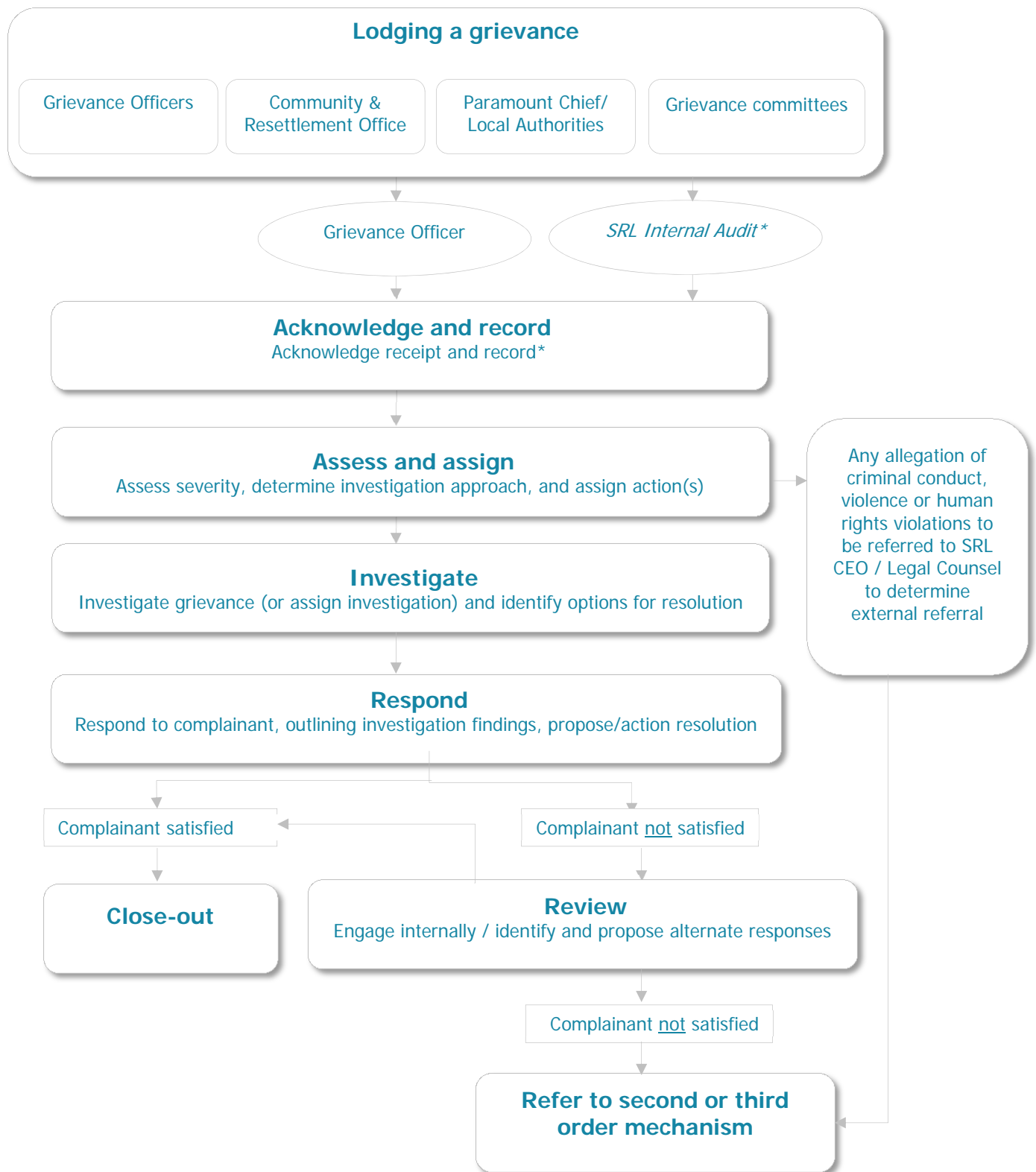
This SRL Grievance Mechanism is open to all stakeholders who consider themselves affected by the SRL Operations in Area 1 and Area 5 Lease area, including resettlement related grievances.

These may be submitted on a named or anonymous basis. Although anonymous submissions may be harder to resolve, they will be treated in the same way as named complaints to the extent reasonably possible.

There are no restrictions on the type of issue a stakeholder can raise via this mechanism. However, when a complaint is received that is more appropriately handled under a separate SRL process established for that purpose (i.e. employment or business integrity related issues), it will be re-directed so as to prevent parallel processes being followed. All complaints received under this procedure shall be tracked by the Grievance Officers.

SRL reserves the right not to address a complaint which it reasonably considers amounts to no more than general, unspecified and therefore un-actionable dissatisfaction with SRL; malicious or vexatious in nature, or concerns a matter for which SRL has no formal responsibility (for example, a matter under government control).

Fig 11.1 SRL Grievance Mechanism Flowchart



* Grievances against Community department / personnel should be directed to the Internal Audit department to determine how to be assigned and investigated.

12 Monitoring and evaluation plan

12.1 Introduction

The final phase of resettlement is the process of monitoring affected persons and the evaluation of this process and its outcomes. The key objectives are to:

- provide information on implementation of this RMP, in order to allow the timely adjustment of implementation arrangements where required;
- demonstrate that the resettlement process is being managed appropriately and sensitively; and
- identify demonstrable evidence that project-affected people have restored or improved their living conditions.

This section provides a summary of the Monitoring and Evaluation Plan for the Foinda Resettlement Project.

The IFC (RAP Handbook, p. 49) requires project sponsors to:

“monitor and report on the effectiveness of Resettlement Action Plan implementation (...). The objective of monitoring is to provide the sponsor with feedback on RAP implementation and to identify problems and successes as early as possible to allow timely adjustment of implementation arrangements”.

Monitoring and evaluation activities should be:

“integrated into the overall project management process, and the Resettlement Action Plan must provide a coherent monitoring plan that identifies the organizational responsibilities, methodology, and the schedule for monitoring and reporting”.

12.2 Monitoring

Monitoring of the relocation process from planning to post implementation would allow SRL to measure progress against project milestones. Examples of performance milestones might include:

- community engagement activities held (i.e. focus groups, public meetings etc);
- census and asset inventory completed;
- individual household-level entitlements signed off;
- grievance redress procedures in place and functioning to an agreed time-frame;
- compensation payments disbursed;
- relocation of people completed; and
- livelihood restoration activities initiated

The Project shall prepare performance-monitoring reports at regular intervals. Monitoring of the Foinda Resettlement Project will be undertaken as follows:

- internal monitoring and evaluation will be carried out by SRL;
- external monitoring and evaluation activities will be conducted by an independent consultant; and
- SRL will support re-settlers and their host community to assume an active role in monitoring of the resettlement activities.

During the monitoring period, the intensity of the process shall vary. For example, before and immediately after relocation, monitoring requirements shall be significantly higher. Subsequently, monitoring would occur at least annually for three years. There shall be three key components of a monitoring plan:

- performance monitoring;
- impact monitoring; and
- external audits, involving international experts.

12.2.1 Internal Monitoring

The Livelihood and M&E Officer is responsible for all internal monitoring of RAP implementation undertaken by SRL Resettlement Unit. The SRL Audit department will also have full overview to monitor and audit the implementation of the project. Regular progress reports will be prepared and submitted to SRL CEO/COO. The internal monitoring looks at inputs, processes, and outcomes of stakeholders' engagement, compensation/resettlement/other impact mitigation measures.

Input monitoring

- Establish if staff, organization, finance, equipment, supplies and other inputs are on schedule, in the requisite quantity and quality.

Process monitoring:

- Assesses program implementation strategies and methodologies and the capacity and capability of program management personnel to effectively implement and manage the programs.
- Documents lessons learned and best practices and provide recommendations to strengthen the design and implementation of RAP.

Output monitoring establishes if agreed outputs are realised on time for:

- Communication with the affected communities
- Agreed resettlement and compensation policy, procedures, and rates

- Compensation for crops, buildings, and lost business
- Construction of infrastructure and occupation of housing
- Livelihood program delivery and uptake
- Grievance resolution
- Attention to vulnerable people.

Outcome (or effectiveness) monitoring

- Determines the degree to which the program objectives and performance targets have been achieved.

12.2.2 External Monitoring

Independent monitoring will be commissioned for the Foinda Resettlement Project. This will be undertaken during the implementation stages and subsequent to the relocation of Foinda residents, up to an agreed completion audit. Terms of Reference for this monitoring are currently being prepared.

13 Budget and implementation schedule

13.1 Introduction

This Chapter briefly describe SRL's financial approach to implementing The Foinda Resettlement Project. SRL will make available required resources for the project. The following is currently being actioned:

- establishing a resettlement unit with trained human resources to deal with policy, planning, implementation, and monitoring of resettlement-related issues;
- provisions for and sources of funding for running the resettlement unit and compensation and resettlement;
- provisions for contingency funds in resettlement budget; and
- annual budget allocations and provisions for budget modifications.

13.2 Budget and cost

Table 13.1 Summary Budget: Foinda Resettlement Project

Cost Breakdown (US\$000)	Current Plan
Site acquisition and clearing	73
Dwelling construction	1,536
Infrastructure construction	200
Clearing and relocation	144
Crop compensation	200
Livelihood restoration 2019/20	730
Data management, auditing	114
Total	2,997

RESETTLEMENT MANAGEMENT PLAN – Foinda Village

	SIERRA RUTILE LIMITED - FOINDA RELOCATION PROJECT IMPLEMENTATION SCHEDULE																																															
ACTIVITIES AND DELIVERABLES -STATUS	SEPT 2017				OCT 2017				NOV 2017				DEC 2017				JAN 2018				FEB 2018				MAR 2018				APRIL 2018				MAY 2018				JUNE 2018				JULY 2018				AUG 2018			
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Prepare Resettlement Budget (Draft)																																																
Preparation and submission of MEP for relocation implementation																																																
Stakeholder Engagement																																																
Declaration of Cut-off date/ Moratorium																																																
Plan, Train & Conduct Census, Socio-Economic and Asset Survey																																																
Verify and Analyse survey data																																																
Prepare and Submit RMP to EPA-SL																																																
Public disclosure and consultation on RMP																																																
Procure/ Develop IMS																																																
Identification and evaluation of potential resettlement sites																																																
Preliminary and final design of houses/village																																																
Expression of interest, tendering, evaluation and selection of contractor																																																
Negotiation and signing of Construction Contract(s)																																																
Safety inspection of contractors' fleets																																																
Mobilize and complete construction of buildings and facilities at new village site																																																
Recruitment of Resettlement project Engineer																																																
Recruitment of a Livelihood & Monitoring and Evaluation Officer																																																
Start planning and implementing Livelihood Program																																																
Preparation and consultation with Foinda Community on draft Entitlement Matrix																																																
Negotiate each household's entitlement; Finalise and gain PAP/PAH approval																																																
Prepare all Household Compensation Agreements / PAP to review and sign																																																
Payment of compensation																																																
Allocation of new houses and move to new village																																																

14 APPENDICES

- A1 Sierra Leone Legal and Regulatory Framework
- A2 International Requirements
- A3 Sample Monitoring and Evaluation form
- A4 Risk Management
- A5 Records of engagement held to date
- A6 Crop Compensation Rates
- A7 Foinda Relocation – household food transition support
- A8 Public Consultation Report
- A9 Bibliography

A1 Sierra Leone Legal and Regulatory Framework

The Constitution of Sierra Leone 1991 (as amended in 2001)

- The Constitution includes provisions to protect the rights of individuals to private property, and also sets principles under which citizens may be deprived of their property in the public interest as described in Section 21 of the Constitution.
- Compensation payment must be prompt. It also makes provision for adequate compensation and access to the court or other impartial and independent authority for the determination of the land owner's interest or right, and the amount of any compensation to which he/she is entitled and for the purpose of obtaining prompt payment of that compensation.

The Sierra Leone National Land Policy (2015) Final Draft (Version 6)

- The National Land Policy proposes to improve upon and strengthen the existing land administration systems and laws, particularly so, by recognizing and working with the differentiated land tenure categories in the Western Area and the provinces, enhancing the capacities of relevant institutions on mobilizing sufficient national and international resources to ensure the implementation of the policy.
- Most land in Sierra Leone is considered common property and tenure is based on non-title usufruct and traditional rights.
- The Paramount Chief is considered the traditional custodian of the land.
- Most households have access to family farm plots that are allocated to family members by the family elders (head of household).
- Households without access to family lands may be allocated land to be used only for food crops. However, the land reverts back to the household with the original traditional rights afterwards.
- Land ownership for a specific usage such as resettlement of a village, can be considered on condition of an agreed sum being paid to the traditional household owner(s).
- Notwithstanding, it is also important to note that The Government of Sierra Leone however has the right of eminent domain and has the authority to acquire lands for public good or national reasons.
- Vulnerable Groups are to be protected under the Land Policy. Section B2.2.1 part b,c,d & e (i) recommends support for women, squatters and vulnerable people on land issues; safeguarding tenure security; gender equality and rights of women; ensuring the active, free, effective, meaningful and informed participation of people affected by land acquisition;

protection and promotion legitimate tenure rights under customary law. Noted with particular interest here are squatters who are not traditional land right holders or landowners.

- Gender equality as acknowledged in the Policy under Section 3.2, states that culture and traditions continue to support male inheritance of family land while there is lack of gender sensitive family laws. There is conflict between constitutional and international provisions on gender equality vis-à-vis customary practices that discriminate against women in relation to land ownership and inheritance. International conventions on women's rights relevant to women's land rights ratified by the Government of Sierra Leone have not been translated into policies or laws. Gender issues can be a sensitive when planning and managing resettlement. Sierra Leone law appear to contradict itself as some parts demand anti-discriminatory practices but other parts relating to land ownership and tenure discriminates against women.
- The NLP under Section 4.3, IV states that there is no such direct or express provision in the Sierra Leone Constitution for compulsory acquisition of land. However, there is an implied position as referenced in section 21(1) of the SL Constitution.

The Mines and Minerals Act 2009 (MMA 2009)

The Mines and Minerals Act 2009 is the most important legal instrument covering mining activities in SL. It also outlines the legislation in terms of land acquisition and use by mining companies, resettlement and compensation. The relevant sections are outlined below.

- Pursuant to Sections 32, 35, 37, and 38 of the Mines and Minerals Act 2009, the holder of a mineral right shall respect the surface rights of those within and in close proximity to a mining area including:
 - obtaining consent from lawful landowners and occupiers prior to entering lands and commencing exploration or other mining activities;
 - paying fair and reasonable compensation for land use and disturbances; and
 - where necessary, provide a resettlement option which is equivalent to or better than their current living environment
- Section 38 particularly explained key principles that should be considered for involuntary resettlement. These principles converge well with the IFC principles.
 - The Minister shall ensure that all owners or lawful occupiers of land who prefer to be compensated by way of resettlement as a result of being displaced by a proposed mining operation are resettled on suitable alternate land, with due regard to their economic well-being and social and cultural value so that their circumstances are similar to or improved when compared to their circumstances

before resettlement, and the resettlement is carried out in accordance with the relevant planning laws.

- the cost of resettlement shall be borne by the holder of the mineral right
- Subject to this section, the Minister and a person authorised by the Minister may take the necessary action to give effect to a resettlement agreement or determination.
- Compulsory Acquisition as a last resort, is acceptable when direct negotiation with landowners to acquire land fails. Section 36, Parts 1,2 of the MMA 2009 explains this clearly unlike the SL Constitution.
- A Formal Grievance Mechanism, pursuant to the Act and Sections 133 (2) (a), 138, 139 and 140 (f) of the Mines and Minerals Act 2009, must be established by the holder of a mineral right shall make it accessible to the local communities.

The Environmental Protection (Mines and Minerals) Regulations 2013

The Environment Protection (Mines and Minerals) Regulations 2013 (hereinafter referred to as the “Environmental Regulations”) were promulgated in July 2013.

- The regulations provide detailed guidance on the permitting process to be undertaken for mining companies, guidance for the contents of the ESIA and related management plans.
- Part III and IV requires the mineral right holder, in this case SRL, to prepare a **Resettlement Management Plan** (RMP) in cases where there is known or potential involuntary displacement caused by mining activities.
- **Stakeholder Consultation** again is strongly stressed as Part III of these regulations, stating that the mineral right holder must conduct consultations with the affected and displaced persons in ‘good faith and in an open and transparent manner’.
- A **Resettlement Committee** is required under Section 34. It is to be established for projects involving potential or actual resettlement.

A new inter-ministerial committee entitled the “Resettlement Committee” dealing with resettlement related issues shall be established in accordance with the provisions contained in any law relating to the resettlement of local communities and to further implement the objectives of Section 38 of the Mines and Minerals Act 2009.

- A **grievance mechanism** is required under Section 76. It must be established as part of mining right holders’ duty to consult with Local Communities. The grievance mechanism must satisfy the following overarching principles; such as it must be legitimate; easily accessible, predictable, equitable, transparent; promote engagement and dialogue; and must uphold and respect laws of SL.

- The Regulations requires SRL to have a designated grievance officer early in the project cycle to. Their role will be to inform the local community and the Primary Host Community and raise awareness of the grievance mechanism; to manage grievances and ensure full documentation of grievance processes; and to meet members of the community to resolve informal complaints.
- SRL has a dedicated grievance officer to manage this process. The grievance officer would be provided with adequate training to prepare them to carry out involuntary resettlement grievances as well. Section 7 discusses the grievance mechanism.

The Sierra Rutile Agreement (Ratification) 2002

Engagement with and participation of affected communities in negotiations is required under this agreement. Furthermore, communities must be paid fair and reasonable compensation for any damage to crops, trees and buildings. Section 10, b (2v) clearly states that: “If at any point a resettlement of the local population appears to be absolutely essential, the company shall move with utmost caution, with the consent of the Government and in consultation with local authorities in persuading the local population to resettle and provide a fully adequate resettlement programme in accordance with the directions of the responsible minister”. Part 2v in discussing cultural issues, stated that SRL “.....shall respect and cause its employees and contractors to respect the customs of the local population”.

A2 International Requirements

United Nations Conventions on Culture as ratified by Sierra Leone

Sierra Leone is a signatory to some international instruments, including those of the United Nations (UN). Being a signatory requires states to adopt and change laws to meet these conventions and fulfil the requirements. Three of such instruments relevant to involuntary resettlement mentioned below will be adhered to by SRL (Table A.3).

Table A.3: United Nations Conventions on Cultural Diversity and Heritage

Year Ratified	UN Convention and Description
2006	<p>UN Convention for the Safeguarding of the Intangible Cultural Heritage</p> <p>Defines intangible cultural heritage as the practices, representations, expressions, knowledge and skills, as well as the associated instruments, objects, artifacts and cultural spaces that communities or groups recognize as part of their cultural heritage. The purpose of this Convention is to safeguard the intangible cultural heritage and ensure respect for the intangible cultural heritage of the communities, groups and individuals concerned. It also aims to raise awareness at the local, national and international levels of the importance of the intangible cultural heritage and of ensuring mutual appreciation thereof and provide for international cooperation and assistance.</p>
2008	<p>UN Convention on the Protection and Promotion of the Diversity of Cultural Expressions</p> <p>Defines cultural expressions as those expressions that result from the creativity of individuals, groups and societies and that have cultural content. The Convention is underpinned by eight principles. These include the principle of respect for human rights and fundamental freedoms, equal dignity of and respect for all cultures, equitable access, sustainability and complement of economic and cultural aspects of development.</p>

1977 UN Convention Concerning the Protection of World Cultural and National Heritage

Defines the kind of natural or cultural sites, which can be considered for inscription on the World Heritage List. The Convention sets out the duties of States Parties in identifying potential sites and their role in protecting and preserving them. By signing the Convention, each country pledges to conserve not only the World Heritage sites situated on its territory, but also to protect its national heritage.

A3 Sample Monitoring & Evaluation Form

		Not achieved	Partly achieved	Fully Achieved
MONITORING INDICATORS	CHECKLIST/KPIs	STATUS (TRAFFIC LIGHT)	COMMENT(S)	
Basic Information captured on Project-affected Households (Social Survey) (Pre-implementation Phase)	Location			
	Composition and structures, ages, education and skill levels			
	Gender of household head			
	Ethnic group			
	Access to health, education, utilities and other social services			
	Housing type			
	Land use and other resource ownership patterns			
	Occupation and employment patterns			
	Income sources and levels			
	Agricultural production data (for rural households)			
	Participation in neighbourhood or community groups			
	Access to cultural sites and events			
	Value of all assets forming entitlements and resettlement			
Restoration of Livelihood/Living Standards (Post-Implementation Phase)	Were house compensation payments made free of depreciation, fees or transfer costs to the PAP?			
	Have PAPs adopted the housing options developed?			
	Have perceptions of “community” been restored?			
	Have PAPs achieved replacement of key social cultural elements?			
	Were compensation payments sufficient to replace lost assets?			
	Did transfer and relocation payments cover these costs?			
	Did income substitution allow for re-establishment of enterprises and production?			

	Have vulnerable groups been provided income-earning opportunities? Are these effective and sustainable?		
	Do the jobs provided restore pre-project income levels and living standards?		
	Have enterprises affected received sufficient assistance to re-establish		
Budget and Timeframe (Implementation and Post-Implementation Phases)	Have all land acquisition and resettlement staff been appointed and mobilized for the field and office work on schedule?		
	Have capacity building and training activities been completed on schedule?		
	Are resettlement implementation activities being achieved against the agreed implementation plan?		
	Are funds for resettlement being allocated to resettlement agencies on time?		
	Have resettlement offices received the scheduled funds?		
	Have funds been disbursed according to the Resettlement Plan?		
	Has the social preparation phase taken place as scheduled?		
	Has all land been acquired and occupied in time for project implementation?		
Delivery of Compensation and Entitlements (Implementation and Post-Implementation Phases)	Have all PAPs received entitlements according to numbers and categories of loss set out in the entitlement matrix?		
	Have PAPs received payments for affected structures on time?		
	Have all received the agreed transport costs, relocation costs, income substitution support and any resettlement allowances, according to schedule?		
	Have all replacement land plots or contracts been provided? Was the land developed as specified?		
	How many PAPs received land titles?		
	How many PAPs received housing as per relocation options in the RAP?		
	Does house quality meet the standards agreed?		
	Have relocation sites been selected and developed as per agreed standards?		
	Are the PAPs occupying the new houses?		

Delivery of Compensation and Entitlements	Are assistance measures being implemented as planned for host communities?		
	Is restoration proceeding for social infrastructure and services?		
(Implementation and Post-Implementation Phases)	Are the PAPs able to access schools, health services, cultural sites and activities at the level of accessibility prior to resettlement?		
	Are income and livelihood restoration activities being implemented as set out in income restoration Plan? For example utilizing replacement land, commencement of production, numbers of PAPs trained and provided with jobs, micro-credit disbursed, number of income generating activities assisted?		
	Have affected businesses received entitlements including transfer and payments for net losses resulting from lost business and stoppage of production?		
Public Participation and Consultation (Pre-Implementation; Implementation; Post Implementation Phases)	Have consultations taken place as scheduled including meetings, groups, and community activities?		
	Have appropriate resettlement leaflets been prepared and distributed?		
	How many PAFs know their entitlements? How many know if they have been received?		
	Have any PAFs used the grievance redress procedures? What were the outcomes?		
	Have conflicts been resolved?		
	Was the social preparation phase implemented?		
Benefit Monitoring (Post-Implementation Phase)	What changes have occurred in patterns of occupation, production and resources use compared to the pre-project situation?		
Effectiveness of Resettlement Planning (Post-Implementation Phase)	Were the PAPs and their assets correctly enumerated?		
	Was the time frame and budget sufficient to meet objectives?		
	Were entitlements too generous?		
	Were vulnerable groups identified and assisted?		
	How did resettlement implementers deal with unforeseen problems?		
	Were there unintended environmental impacts?		
	Were there unintended impacts on employment or incomes?		

A4 Project Risk Management

	POTENTIAL RISKS	MITIGATING MEASURES/ACTION	RESPONSIBLE PERSON/ DEPARTMENT
A	<p>Risks of not being compliant with national legal requirements</p> <p>Risk of causing PAP to be destitute as a result of poor planning or implementation</p> <p>Legacy issues from previous relocation programs</p>	<ul style="list-style-type: none"> • Timely and effective engagement with The National Minerals Agency (NMA) and Environmental Protection Agency (EPA) to notify of intention as required • SRL to dedicate someone from CAD to act as Grievance Officer as required by EPA Legislation • Once baseline data is collected, the RPF will be reviewed, updated with these data and a Resettlement Management Plan (RMP) produced in compliance with EPA Legislation: (The Environmental Protection (Mines and Minerals) Regulations 2013). • Engage with District Council to align SRL resettlement project with their development plans • Conduct, analyse and prepare an accurate and transparent Entitlement Matrix • Compensation processed and paid in an accurate, timely and fair manner • Proper planning and the inclusion of people with specific livelihood restoration/ development expertise (recruitment of a Livelihood Specialist) to plan and implement such programme • Identify records of previous relocation program; communicate a fresh start to stakeholders 	Resettlement Manager
B	<p>Delays in the implementation of Involuntary Resettlement may result in in-migration and influx even when a cut-off date is declared</p> <p>Risk of speculative activity/opportunistic farming and building of new structures and houses</p>	<ul style="list-style-type: none"> • A rapid asset survey should be conducted immediately after the declaration of a cut-off date to quickly record all assets belonging to households and which are at risk as a result of the project. • Communities should also be informed that any further development will not be eligible for compensation and resettlement once cut-off date is declared. • Ensure land acquisition process does not take longer to consult. Negotiate and conclude • Resettlement Team must plan the collection of baseline data as one co-ordinated activity. This will avoid duplication and enable data to be collected to meet all project outcomes and impact measurement requirements, including future monitoring. 	Resettlement Manager
C	High community and individual expectations	<ul style="list-style-type: none"> • While policies and standards need to be adhered to, they will be applied in a practical way appropriate to each country and community context 	Resettlement Manager

D	Lack of available suitable replacement land	<ul style="list-style-type: none"> Commence Land acquisition process early; Engage and consult with appropriate stakeholders who own land and have stake in the land 	Resettlement Manager
E	Consultation fatigue by the community	<ul style="list-style-type: none"> Census, Socio-economic study and asset inventory will be conducted together. Duration must not last more than 14 days 	Resettlement Manager CR Manager
F	Hidden costs of project delays (eg longer negotiations and protests versus the cost of doing resettlement right)	<ul style="list-style-type: none"> Prepare a work plan and schedule so that the sequence of steps required are clearly understood and sufficient time is allocated to undertake them. Land acquisition and resettlement activities should have a dedicated budget, team and schedule that should be aligned with overall project planning Ensure tendering/bidding process and contract negotiation starts early and seamlessly; processes adhered to 	Commercial Manager Resettlement Manager
G	There may be a conflict between national policy requirements and international guidelines.	<ul style="list-style-type: none"> SRL's current resettlement policy framework allows for early scoping of key issues and clarity on the legislative and policy context. Gap analysis presented in the RPF will inform SRL's position on the higher standard 	Resettlement Manager
H	Prepare for unfavourable attention—no matter how well land acquisition and resettlement is done, there may be someone who is not happy with the approach.	<ul style="list-style-type: none"> Any resettlement solution should be considered in the local context and offer choices to those being resettled, with the informed participation of affected people and statutory authorities. 	Resettlement Manager
I	Changes in the project footprint and delays in implementation can lead to gaps in surveys and poor baseline data.	<ul style="list-style-type: none"> Prepare a work plan and schedule so that the sequence of steps required are clearly understood and sufficient time is allocated to undertake them. Effective communication and planning between in-house teams involved 	Technical Manager COO
J	<p>Political - National Elections scheduled for March 2018 might create political tension and possible security risks to operations and resettlement implementation activities.</p> <p>Change of National and regional political heads such as Party in Government; MP; Councillors etc may attract renewed negotiation and engagement that may delay process</p>	<ul style="list-style-type: none"> Prepare engagement strategy for such potential changes SRL must not be seen to be siding a particular party or candidate SRL to avoid having meetings that could be hijacked by political interest May put on hold all Resettlement activities if security risks develop. 	Corporate Affairs Director Security Manager Resettlement Manager
K	<p>Lack of accurate collection of quality data</p> <p>Poor management or loss of survey data can lead to legal challenges and opportunities for fraud.</p>	<ul style="list-style-type: none"> Appropriate information management system developed and utilised Data adequately stored and backed-up Ensure the team have experience members to conduct the survey and ability to effectively supervise team Provide training for surveyors/enumerators Secure service of competent local consultant firm/expert to undertake studies and get in-house team to learn from them 	Resettlement Manager

L	Poor quality of replacement housing built. This can lead to cost implication on SRL's part and grievance from community affected. Risk of disruption to SRL's operations	<ul style="list-style-type: none"> • Effective tendering and recruitment process for Contractor(s) • Contractor must conform to national building standards and minimum building requirements to ensure the provision of quality replacement housing and must be closely monitored by SRL/PAPs etc. • Involving housing recipients in construction activities can be a useful approach as it provides employment but also utilise any skills within. This should be under close supervision of professional contractors to ensure quality control and avoid delays in construction. 	Resettlement Manager Commercial Manager Resettlement Project Engineer
M	<p>Failure to properly integrate displaced livelihoods into host communities can result in jealousy, isolation and an ongoing dependency on the company.</p> <p>Risk of Long-term community dependency on SRL that normally raises expectation and impact on its "social licence to operate"</p>	<ul style="list-style-type: none"> • Engage with Host communities. • Inclusion of Host communities in livelihood restoration/ development programmes • Integrate PAP and Host communities in all Resettlement livelihoods programme planning and implementation, ensuring they participate in and benefit from the CDA investments • Leverage skills and resources from external organizations delivering similar services that provides alternative livelihood support 	Resettlement Manager
N	Length of time taken to put in place legally binding security of tenure documents	<ul style="list-style-type: none"> • Effective internal discussion with member of senior management team • Engage with and seek support from SRL Legal Counsel from an early stage. 	Legal Counsel

A5 Records of engagement held to date

Attendance List for Meeting with Foinda Community to Set Up the Village Resettlement Committee – 21 November, 2017					
NO	NAME	DESIGNATION	ORGANIZATION/CHIEFDOM	CONTACT NUMBER	SIGNATURE
1	Haua Turay	Farmer	Foinda		
2	Isaka Argumena	—	—		
3	Yeama Turay	—	—		
4	Lucy Biabona	—	—		
5	Alpha Messaque	GRU Chairman	—	099009949	
6	Tegu Gbama	Landowner	—	07845058	
7	Abert Bilabona	—	—	016239876	
8	Abdul Barnie	Farmer	—		
9	Anthony Bisteh	—	—	079111716	

Attendance

Attendance List for Meeting with Foinda Community to Set Up the Village Resettlement Committee – 21 November, 2017					
NO	NAME	DESIGNATION	ORGANIZATION/CHIEFDOM	CONTACT NUMBER	SIGNATURE
1	Yeama Iking	Farmer	Foinda	078-783661	
2	Harlana Sesay	—	—		
3	Fatmata Bahna	Trader	—	078491758	
4	Edith S. Amara	House wife	—		
5	Katunne Kpanaba	Trader	—	078451939	
6	Sallu Kpanaba	Farmer	—		
7	Kadiatu Keromua	—	—		
8	Marimel Kpanaba	—	—		
9	Haruk Penyikie	—	—		



ATTENDANCE SHEET – STAKEHOLDERS' ACTIVITIES – MEETING

MEETING VENUE: Foinda DATE: 21/11/2017 TIME: 9:15PURPOSE OF MEETING: To Set up the Village Resettlement Committee

NO.	NAME OF ATTENDEE	ROLE/TITLE	COMMUNITY/ORGANIZATION	CONTACT NUMBER	SIGNATURE
41	Betty Katerma	Land Owner	Foinda		
42	Mamie Jayah	-	-		
43	Memunah Will	Farmer	-		
44	Isatu koroma	-	-		
45	Kadie Wuyie	-	-		
46	Fatmata Bedden	Land Owner	-		
47	Gassimu Kpanaba	Police	-		
48	Memunah Sei	Farmer	-		
49	Foday Kpanaba	-	-		
50	Fatmata koroma	-	-		
51	Isatu koroma	-	-		
52	Bai Sei	-	-		
53	Nap'aku Katerma	-	-		
54	Sargor Gbama	Land Owner	-		
55	Betty Kpanaba	Farmer	-		
56	Kadie Umar	-	-		
57	Jenneh Messaga	TBA	-		
58	Ajuma korba	Land Owner	-		
59	Abdul khair	Land Owner	-		
60	Hannah Jurea	-	-		

Attendance Sheet – Resettlement Unit

Page 1



ATTENDANCE SHEET – STAKEHOLDERS' ACTIVITIES – MEETING

MEETING VENUE: Foinda DATE: 21/11/2017 TIME: PURPOSE OF MEETING: To Set up the Village Resettlement Committee

NO.	NAME OF ATTENDEE	ROLE/TITLE	COMMUNITY/ORGANIZATION	CONTACT NUMBER	SIGNATURE
1	Tommy Brown	Section Chief	Bigo Section		
2	Nusup M. Longbo	Section Speaker	Bigo Section	0727116	
3	Osman Baggali	Township	Mbelleh II	0767409	
4	Bockarie Jaka	Ag. Town Chief	Foinda	07552294	
5	Joseph Katerma	Land Owner	Foinda		
6	Alfred Fannie	-	-		
7	Yeama Katerma	-	-		
8	Mohamed	Town Elder	-		
9	Firod Ngallay	Area Chief	-		
10	Lamin Sannal	Chief	-		
11	Edward Alie	Youth	-		
12	Abdul Sam	Visitor	-		
13	Foday Sharka	Teacher	-		
14	Noah Yarpie	Imam	-		
15	Mohamed Bayal	Town Speaker	-	07671303	
16	Abu Gbama	Chief	-	07989555	
17	Alusine Turay	Youth	-	07979294	
18	Bassir Turay	Town Elder	-		
19	Alfred Break	-	-		
20	Thomas Beal	Teacher	-	07625294	

Attendance Sheet – Resettlement Unit

Page 1



ATTENDANCE SHEET – STAKEHOLDERS' ACTIVITIES – MEETING

MEETING VENUE: Foinda DATE: 21/11/2017 TIME: 9:15PURPOSE OF MEETING: To Set up Village Resettlement Committee

NO.	NAME OF ATTENDEE	ROLE/TITLE	COMMUNITY/ORGANIZATION	CONTACT NUMBER	SIGNATURE
21	Andrew Kpanaba	Land Owner	Foinda	079059635	
22	Joseph Abibu	Youth	-	078940969	
23	Mustapha Koroma	-	-	07592430	
24	Jabbe Legbel	Area Chief	-	070522357	
25	Lansana Messaga	Town Elder	-	079313466	
26	Shaku Kpana	Town Elder	-	076442947	
27	Alie Koroma	Town Head	-	078910150	
28	Peter Komang	Pastor	-	076224148	
29	Agnes Katerma	Teacher	Mosenele	073407633	
30	Saidu Tura	Black Smith	Foinda		
31	Amara Sannie	Householder	-	079100632	
32	Brima Biatoo	Elder	-		
33	Amie Gbama	Land Owner	-	076505534	
34	Sadu Sheriff	Farmer	-	079710950	
35	Agnes Sannie	Owner	-	072689419	
36	Abdul Bealtan	Farmer	-	079727242	
37	Mamie Amara	Land Owner	-		
38	Letty Tiboka	-	-	095671935	
39	Francis Gbama	Welder	-	076907155	
40	Marjama Chally	Trader	-		

Attendance Sheet – Resettlement Unit

Page 1

Attendance List for Meeting with Foinda Community to Set Up the Village Resettlement Committee – 21 November, 2017

NO	NAME	DESIGNATION	ORGANIZATION/CHEFDOM	CONTACT NUMBER	SIGNATURE
1	Haica Turay	Farmer	Foinda		
2	Isatu Ansungu	-	-		
3	Yeama Turay	-	-		
4	Lucy Bialama	GRU	-		
5	Alpha Messaga	Chairman	-	099069949	
6	Tugu Gbama	Landowner	-	078115053	
7	Abert Bialama	-	-	076239876	
8	Abdul Barnie	Farmer	-		
9	Anthony Biateh	-	-	079711476	

RESETTLEMENT MANAGEMENT PLAN – Foinda Village

Attendance List for Meeting with Madina Community and Stakeholders of Imperi – 20 November, 2017					
NO	NAME	DESIGNATION	ORGANIZATION/CHIEFDOM	CONTACT NUMBER	SIGNATURE
1	Sheku John				
2	Musa Macartley				
3	Issa Allieu				
4	Borbor Kpanabom			079-78-1261	Borbor
5	Borbor Boror			076-772344	Borbor
6	Massah Sepeh				
7	Julius Ansumana			079-0162-14	Ansumana
8	Musa Franch			078-20-2487	Franch
9	Mohamed Moseray			076-55289	Moseray

Attendance List for Meeting with Madina Community and Stakeholders of Imperi – 20 November, 2017					
NO	NAME	DESIGNATION	ORGANIZATION/CHIEFDOM	CONTACT NUMBER	SIGNATURE
1	Binta Jabbie-Baroms	Com. Dev. Supt.	SRL-CAD	079-252-153	Binta
2	Joseph Lohien	Resettlement Manager	SRL	016-511-830	Joseph
3	Desmond Doherty	Resettlement Manager	SRL	079514521	Desmond
4	yusuf M. Langba	Section Speaker	Bigo Section	076-214-166	yusuf
5	Tommy Baun	Section chief	1-Kpanaboma	079-737334	Tommy
6	OSMAN BANGAHE	Town Chief	Mbelleh II	076-740414	OSMAN
7	Rebecca Jakah	T Chief	Foinda	076-550234	Rebecca
8	Cecilia Sack	Comm. Rel. Officer	CAD - SRL	078-57555	Cecilia
9	Bashir A. Seisay	Com. Rel. Asst	CAD - SRL	07973339	Bashir

Attendance List for Meeting with Madina Community and Stakeholders of Imperi – 20 November, 2017					
NO	NAME	DESIGNATION	ORGANIZATION/CHIEFDOM	CONTACT NUMBER	SIGNATURE
1	Joe Kpahai				
2	Joseph F Kpanabom			076281318	Joseph
3	Tommy John				
4	Sellu Konneh			076-695313	Sellu
5	Jelbek Sallu				
6	Ahmed S. Ahmed			078-095227	Ahmed
7	Joseph Fatoruma				
8	Yama Fatoruma				
9	Muminatu Hill				

Attendance List for Meeting with Madina Community and Stakeholders of Imperi – 20 November, 2017					
NO	NAME	DESIGNATION	ORGANIZATION/CHIEFDOM	CONTACT NUMBER	SIGNATURE
1	James Jusu	Teacher		076-226931	James
2	Joseph John			076-23380	Joseph
3	Mamie Sallu				
4	Joe Ansumana				
5	Yaminu Kpanabom			079-272183	Yaminu
6	Francis Moseray				
7	Domine Sheku			079-024489	Domine
8	Abbie John				
9	Mikahil Sulaiman			079179937	Mikahil

Attendance List for Meeting with Madina Community and Stakeholders of Imperi – 20 November, 2017					
NO	NAME	DESIGNATION	ORGANIZATION/CHIEFDOM	CONTACT NUMBER	SIGNATURE
1	Sallieu Fofana			088 1081 29	
2	Isatu Sheku			0706 3934 95	
3	Boima John				
4	Iye Koroma				
5	Lansana Massaquoi				
6	Adama Moseyay				
7	Adama Kainjo				
8	Jennel John				
9					

Attendance record of Livelihood consultation meeting with women of Foinda

ILUKA

ATTENDANCE SHEET – STAKEHOLDERS ACTIVITIES - MEETING *with the women of Foinda*

MEETING VENUE: *Foinda* DATE: *12th* January, 2018 TIME: 2:15

PURPOSE OF MEETING: *To discuss the economic living condition of the women of Foinda.*

NO.	NAME OF ATTENDEE	ROLE/TITLE	ORGANIZATION/TOWN	CONTACT NUMBER	SIGNATURE
1	Fatty Gombulage				
2	Mamie Beatty				
3	Mamie Chellag				
4	Betty Mackles				
5	Hawa Ballah				
6	Kaddie Wajuh				
7	Mansaray Bandoma				
8	Moussouma Sei				
9	Susan Chathaka				
10	Salome Gbomana				

Attendance Sheet – Resettlement Unit

Page 1

ILUKA

ATTENDANCE SHEET – STAKEHOLDERS ACTIVITIES - MEETING

MEETING VENUE: DATE: 12th January, 2018 TIME: 2:15

PURPOSE OF MEETING:

NO.	NAME OF ATTENDEE	ROLE/TITLE	ORGANIZATION/TOWN	CONTACT NUMBER	SIGNATURE
11	Hannah Doglah	<i>Jai</i>			
12	Hawa Brima				
13	Tennah Bahai				
14	Hawa Massaquoi				
15	Mamie Sonnie				
16	Jebbeh Sippo				
17	Fatimata Brima				
18	Kaddie Massaquoi				
19	Jamie Kombo				
20	Kaddie Massaquoi				
21	Kaddie Owaru				
22	Isatu Kranabum				

Attendance Sheet – Resettlement Unit

Page 1

48	Lucy Koroma				
49	Hannah Massagui				
50	Ranar Massagui				
51	Abibatu Massagui				
52	Wuyata Conteh				
53	Kadiat Gbouma				
54	Jillo Massagui				
55	Jamimat Sumana				
56	Loua Penyenkie				
57	Jenneh Tur				
58	Sorgo Gbouma				
59	Isatu Gbouma				
60	Katania Barn				
61	Hawa Turay				
62	Hannie Massagui				



ATTENDANCE SHEET – STAKEHOLDERS ACTIVITIES - MEETING

MEETING VENUE: _____ DATE: 12th January, 2018 TIME: 2:15

PURPOSE OF MEETING: _____

NO.	NAME OF ATTENDEE	ROLE/TITLE	ORGANIZATION/TOWN	CONTACT NUMBER	SIGNATURE
23	Jenneh Massagui				
24	Hennie Massagui				
25	Kuleh Ansumana				
26	Hannie Shaka				
27	Edith Akwara				
28	Kona Musa				
29	Hannie Tommy				
30	Iye Tommy				
31	Hawa Beah				
32	Hatini Kpanabum				
33	Kailiwa Brandome				
34	Hawa Turay				
35	Abibatu Kpanabum				



ATTENDANCE SHEET – MEETING WITH THE FOCAL PERSON OF WORLD VISION

MEETING VENUE: BO CITY, SOUTHERN PROVINCE DATE: 10th JANUARY 2018 TIME: 11:30AM

PURPOSE OF MEETING: To discuss SRL/ILUKA Resettlement Livelihood activities in Foinda village, Imperi Chiefdom, Bonthe District and to look at possible areas of Livelihood interventions

NO.	NAME OF ATTENDEE	ROLE/TITLE	ORGANIZATION/TOWN	CONTACT NUMBER	SIGNATURE
1	Joseph Benga	Project Co-ordinator WVSC	World Vision Sierra Leone	076768814	
2	Daniel Stevens	Livelihood and MSE Officer	SRL	079672820	



ATTENDANCE SHEET – FOCUS GROUP MEETING WITH WOMEN OF FOINDA VILLAGE

MEETING VENUE: FOINDA

DATE: 13th January, 2018 TIME: 10:00 AM

PURPOSE OF MEETING: To discuss the economic living condition (Livelihood) of the women of Foinda.

NO.	NAME OF ATTENDEE	ROLE/TITLE	ORGANIZATION/TOWN	CONTACT NUMBER	SIGNATURE
36	Issah Kamara				
37	Agness Sahnir				
38	Mariam Massagui				
39	Alama Giboung				
40	Sando Momoh				
41	Saku Kpanabum				
42	Betty Kpanabum				
43	Kalce Tomung				
44	Mamah Sessay				
45	Mamah Kallah				
46	Sillo Momoh				
47	Mamah Tucker				

A6 Sierra Leone Crop Compensation Rates



GOVERNMENT OF SIERRA LEONE

MINISTRY OF AGRICULTURE, FORESTRY AND FOOD SECURITY
YOUYI BUILDING, FREETOWN

CROP COMPENSATION RATES – REVIEWED MARCH 2014

Government has recently revised rates of payment for crops destroyed during forward preparations for mining as shown in the table below:

N0	Type of Crop	Old Rate (Le) 2006/2007 - 2013	New Rate (Le) 2014 -
1	Bamboo Cane (Cluster)	20,000	100,000
2	Bamboo Cane (Stern)	2,000	4,000
3	Banana (Sucker)	20,000	80,000
4	Bean (Stand)	1,500	3,000
5	Bennie (Star.d)	500	1,000
6	Bitter Ball (Stand)	5,000	10,000
7	Bread Fruit (tree)	50,000	250,000
8	Cabbage (1/2 acre)	35,000	175,000
9	Cabbage (Stand)	2,000	10,000
10	Calabash (Ground) - Stand	50,000	250,000
11	Carrot (Stand)	1,000	5,000
12	Cashew Nut	50,000	300,000
13	Cassava (1/2 acre)	150,000	1,000,000
14	Cassava Heap	5,000	25,000
15	Chinese Yam (Ridge)	20,000	100,000
16	Citrus (trees)/ Lime (tree)	50,000	250,000
17	Coco Yam (heap)	5,000	25,000
18	Cocoa Yam (tree)	45,000	200,000
19	Coconut (Stand)	40,000	200,000
20	Coffee (tree)	35,000	175,000

N0	Type of Crop	Old Rate (Le)	New Rate (Le)
21	Cucumber (1/2 acre)	30,000	150,000
22	Cucumber (Stand)	500	200,000
23	Economic Tree(timber)	60,000	300,000
24	Egusi (stand)	5,000	20,000
25	Farm Hut	150,000	750,000
26	Fence (one yard/3)	50,000	200,000
27	Garden Eggs (stand)	1,000	5,000
28	Ginger (stand)	500	2,500
29	Green (heap)	10,000	50,000
30	Groundnut (1/2 acre)	300,000	1,500,000
31	Guava (improved)	50,000	300,000
32	Guava (local/wild)	30,000	60,000
33	Hot Pepper (1/2 acre)	30,000	150,000
34	Kola Nut (tree)	40,000	200,000
35	Krain-Krain (1/2 acre)	50,000	200,000
36	Lettuce (1/2 acre)	35,000	170,000
37	Lettuce (stand)	300	1,200
38	Maize (1/2 acre)	100,000	600,000
39	Maize (stand)	1,000	2,000
40	Mango improved	50,000	300,000
41	Mango (wild)	30,000	60,000
42	Millet (1/2 acre)	100,000	200,000
43	Newly Brushed Farm (acre)	100,000	300,000
44	Newly burnt farm (acre)	150,000	1,000,000
45	Oil palm (improved)	40,000	200,000
46	Oil palm (local/wide)	25,000	50,000
47	Oil palm processing pit (concrete)	300,000	900,000
48	Oil palm processing pit (local)	100,000	300,000

N0	Type of Crop	Old Rate (Le)	New Rate (Le)
50	Okra (1/2 acre)	40,000	240,000
51	Okra (stand)	5,000	10,000
52	Orange (citrus)	50,000	300,000
53	Plantain (sucker)	20,000	40,000
54	Paw-Paw (stand)	20,000	60,000
55	Pear (avocado)	60,000	300,000
56	Pepper (stand)	5,000	10,000
57	Pineapple (sucker)	5,000	10,000
58	Plum Tree (improved)	40,000	300,000
59	Potato (heap)	20,000	25,000
60	Pumpkin (stand)	25,000	80,000
61	Pumpkin (1/2 acre)	30,000	200,000
62	Raffia palm (one acre)	100,000	150,000
63	Raffia Palm (stand)	1,000	5,000
64	Rice-Inland Valley Swamp (1/2 acre)	200,000	1,000,000
65	Rice-Upland (1/2 acre)	200,000	8 00,000
66	Sorghum (stand)	1,000	5,000
67	Sour Sop (tree)	50,000	100,000
68	Sourel (sour-sour) (heap)	10,000	20,000
69	Sourel (sour-sour) (stand)	300	500
70	Sugar Cane (cluster)	100,000	150,000
71	Sweet Pepper (1/2 acre)	36,000	200,000
72	Tomato (stand)	1,000	5,000
73	Tomatoes (1/2 acre)	35,000	200,000
74	Water Melon (1/2 acre)	40,000	160,000
75	Water Melon (Stand)	5,000	25,000
76	Water Yam (heap)	20,000	50,000



SIERRA LEONE GOVERNMENT
 MINISTRY OF AGRICULTURE, FORESTRY AND FOOD SECURITY
 YOUYI BUILDING
 FREETOWN

FOREST TREES COMPENSATION RATES – REVISED 2014

NO.	TYPE OF FOREST PRODUCE	RATE (2006/2007) LE	RATE (2014) LE
1.a	Class I Forest Tree (Girth 15 ⁺¹¹)	100,000	500,000
b	Class I Forest Tree (Girth 10 ⁺¹¹ - 15 ¹¹)	50,000	250,000
c	Class I Forest Tree (Girth 6 ¹¹ - 10 ¹¹)	25,000	125,000
2.a	Class II Forest Tree (Girth 15 ⁺¹¹)	75,000	375,000
b	Class II Forest Tree (Girth 10 ⁺¹¹ - 15 ¹¹)	40,000	200,000
c	Class II Forest Tree (Girth 6 ¹¹ - 10 ¹¹)	20,000	100,000
3.a	Class III Forest Tree (Girth 15 ⁺¹¹)	50,000	250,000
b	Class III Forest Tree (Girth 10 ⁺¹¹ - 15 ¹¹)	30,000	150,000
c	Class III Forest Tree (Girth 6 ¹¹ - 10 ¹¹)	10,000	50,000
4.	Rubber Tree (Herea brasiliensis)	250,000	600,000
5.	Bamboo (I Pole)	2,000	20,000
6.	Rattan (Bundle of 10)	10,000	30,000



A7 Foinda Relocation – household food transition support analysis

FOINDA RESETTLEMENT PROJECT HOUSEHOLD TRANSITION SUPPORT							
RICE ALLOCATION PER HOUSEHOLD							
Household Number range (Persons)	Number of bags of Rice (bags)	Number of Households	Number of Months	Unit Cost of Rice (SLL)	Total cost of Rice (SLL)	Total Cost of Rice (USD) \$	No of bags in 25Kg
1 to 2	0.5	13	12	105,000	16,380,000	\$ 2,169.54	156
3 to 5	1	84	12	210,000	211,680,000	\$ 28,037.09	2,016
6 and above	1.5	70	12	315,000	264,600,000	\$ 35,046.36	2,520
Total		167			492,660,000	\$ 65,252.98	4,692
MONTHLY CONDIMENT ASSISTANCE PER HOUSEHOLD							
Household Number range (Persons)	Household Entitlement amount (SLL)	Number of Household	Number of Month	Total Monthly condiment (SLL)	Total Monthly Condiment (USD) \$		
1 to 2	240,000	13	12	37,440,000	\$ 4,958.94		
3 to 5	300,000	84	12	302,400,000	\$ 40,052.98		
6 and above	400,000	70	12	336,000,000	\$ 44,503.31		
Total		167		675,840,000	\$ 89,515.23		
GRAND TOTAL							
Household number	Rice (SLL)	Condiment (SLL)	TOTAL (SLL)				
1 to 2	16,380,000	37,440,000	53,820,000				
3 to 5	211,680,000	302,400,000	514,080,000				
6 and above	264,600,000	336,000,000	600,600,000				
TOTAL COST OF FOOD			1,168,500,000				

SRL Grievance Procedure Documents

SRL Grievance Fact Sheet

Sierra Rutile Ltd (SRL) seeks to build strong relationships with stakeholders and manage the impact of its business activities on communities. This includes recognising that complaints may arise from time to time.

The following are questions and answers on SRL Grievance Mechanism:

Question: What is the SRL Grievance Mechanism?

Answer: The SRL Grievance Mechanism is a process dedicated to receiving, recording, investigating and resolving community and public complaints.

Grievances are community complaints alleging specific or general damage, conduct, negative impact or dissatisfaction arising in connection with SRL business activities.

However, issues such as the distribution of casual jobs and employment, the amount of SRL surface rent and Agricultural Development Fund (ADF) paid, allocation of contracts and Community Development Agreement (CDA) funds do not fall under the grievance procedure.

Question: How do you lodge a grievance?

Answer: Stakeholders are directed to submit grievances to the designated SRL Grievance Officers, in person or via telephone as follows:

Area 1	Grievance Officer Community Affairs Office	Tel: 078575350
Sembehun Project	Grievance Officer Sembehun Project Team	Tel: 079514821 / 078965586 077281171 / 030647449

Alternatively, stakeholders can submit grievances to one of the following contact points, who will then forward the grievance to SRL to be dealt with via the grievance procedure:

- Paramount Chiefs
- Chiefdom Grievance Committee
- Village Grievance Committee
- Town Chief
- Section Chief

All grievances lodged to a third party will be collected by a SRL Grievance Officer. Alternatively, if a complaint is being lodged against SRL Community and Resettlement Department (CARD) personnel, including any Grievance Officer, these should be provided directly to SRL's Internal Audit Department, situated at the Plant Site.

Question: What can you expect when a grievance is lodged?

Answer: Once a complaint is received by the SRL Grievance Officer, he/she shall provide the complainant with a completed Grievance Form within 2 working days of receipt of the grievance and advised of the estimated time frame within which a response will be provided.

Investigations into the complaint will be undertaken and the outcome of such investigation shall be communicated to the complainant through an SRL Grievance Officer.

Where a credible grievance is identified, a plan to remedy the issue(s) will be developed. If a complainant is not satisfied with the remedy they can appeal the decision to the Grievance Officer and SRL may review and propose alternative resolution options. If actions are agreed, these can be implemented and the grievance considered closed out.

A second order mechanism, which involves the village and the chiefdom grievance committees, will be applied if the grievance is not resolved by the first order mechanism.

A third order mechanism is for issues that are referred to official agencies (NMA, EPA etc) or the statutory judicial processes for resolution.

Question: What if the complaint is of a sensitive nature?

Answer: SRL is committed to protecting the identity of complainants and to handling personal information in accordance with legal requirements.

SRL will not share personal information with third parties unless required by law or authorized by the complainant.

Question: Is there any option of making an anonymous complaint?

Answer: The option is open to the public and the community to make an anonymous complaint to SRL. Confidentiality will be respected and SRL will take all reasonable steps to protect parties to the process from retaliation.

Note: The SRL Grievance Procedure is also available for communicating concerns about SRL's security arrangements and the conduct of its security personnel.

All stakeholders have the right to submit a complaint without any cost to them.

A8 Public Consultation Report

i. QUESTION/ CONCERNS AND RESPONSES

NAME	CONCERNS EXPRESSED	RESPONSE BY:	RESPONSIBLE DEPARTMENT
Momoh Gbassah	How many towns/villages has SRL relocated	Bintu Jabbie-Koroma (SRL Community Affairs Superintendent) More than 14 villages (approximately)	Community Affairs Department Resettlement Unit
Lansana Massaquoi	Why is it that the company has destroyed their crops and is not paying for it?	Bintu Jabbie-Koroma (SRL Community Affairs Superintendent) She informed the meeting that SRL has and will always pay for crops they have destroyed as per SRL policy. She went further to state that payment of crops compensation has processes to go through before payment is made.	Community Affairs Department
Chief Simeon Amara	Requested that SRL should provide Bus service to transport school going children from Gbangbama to other areas.	SRL noted point but have no intention of operating a bus service	Community Affairs Department
Foday Sharka	Requested for the land to be re-surveyed so that they will know which land exactly belongs to Foinda people.	The Resettlement Manager stated that the said land has already been surveyed and data is been used for surface rent payments and do not require resurveying at this point in time.	Resettlement Unit
Agnes Sonnie	Enquired about what is contained in Resettlement package for Foinda and the areas for which the company will pay crop compensation.	The Resettlement Manager responded that SRL has been consulting with Foinda Resettlement Committee and residents on the following:	Resettlement Unit

	<p>The second part of the question is whether those who have access to their farm land will not be compensated based on the distance</p>	<p>Vulnerable people- additional cash/kind transition support</p> <p>Those that are rent-paying tenant will receive rent support</p> <p>Members of household will receive other support yet to be decided. Example of support relocated communities had received from other institutions include, foam mattresses and a bag of rice for two or three months.</p> <p>Affected-households and SRL will finalise on what kind of support package will best suit their transition and livelihood needs</p>	
<p>Brima Penyikie</p>	<p>Raised concern about land use in the relocation site, as they might not be permitted to use somebody else's land. However, in Foinda, anybody could use somebody else's land.</p>	<p>The Resettlement Manager answered that SRL is paying for the land in total. Foinda community people can still access their land that SRL will not disturb or use. SRL will continue to pay surface rent for the current Foinda land. He furthered that the traditional method of seeking the use of land in the Chiefdom should still be practiced.</p>	<p>Resettlement Unit</p>
<p>Alpha Massaquoi</p>	<p>Asked- whether they are going to sign document for crops that have been assessed, because no document has been presented to them to show that crops have been assessed.</p> <p>Secondly, is the council going to provide packages as we are going to be relocated? EPA should provide seedlings to plant in the new community.</p>	<p>The Resettlement Manager responded that no document will be provided for signing during this meeting. The Compensation Agreement will be prepared, agreed and signed by both SRL and affected household before they are physically relocated</p> <p>There were some trees we retained and some others we have to remove because we considered it not good in the construction area.</p> <p>The Chief Administrator of Bonthe District Council stated that the Council will still</p>	<p>Resettlement Unit</p>

		provide what it ought to provide based on their local development plans. Currently, the council is constructing 75 well around the Chiefdom.	
Chief Joseph John Madina Village	We want SRL to change the roof of all our houses in Madina as they leak really badly. SRL must also provide Madina houses with kitchens for each houses and other social amenities	The Resettlement Manager responded that SRL will not rehabilitate their houses as those house were handed over to the owners in 1994 and are not SRL properties. However, SRL has committed to provide water well; communal toilets and livelihood support to Madina residents.	Resettlement Unit

ii. CONCLUSION

SRL is pleased that stakeholders demonstrated knowledge and understanding of the Foinda resettlement process during this meeting. Concerns and questions were limited. The reason for this is likely the result of continuous and effective consultation and engagement with affected people and stakeholders since the commencement of the process. SRL will ensure this is maintained and the views of stakeholders are taken into account.

Follow-up actions required

- SRL will continue to engage and consult with affected households on finalizing the specifics of their entitlements and compensation
- SRL will finalize details of the transition support package and obtain sign-off by Foinda residents. This will take into account suggestions from affected residents and the entitlement matrix presented in the RMP.
- SRL will finalise the RMP after receiving any additional feedback from The EPA-SL.

APPENDIX

1. Photographs



Above. Photo 1: Resettlement Manager making a presentation on the Resettlement Management Plan

Below. Photo 2: Project-affected communities at the consultation and disclosure meeting



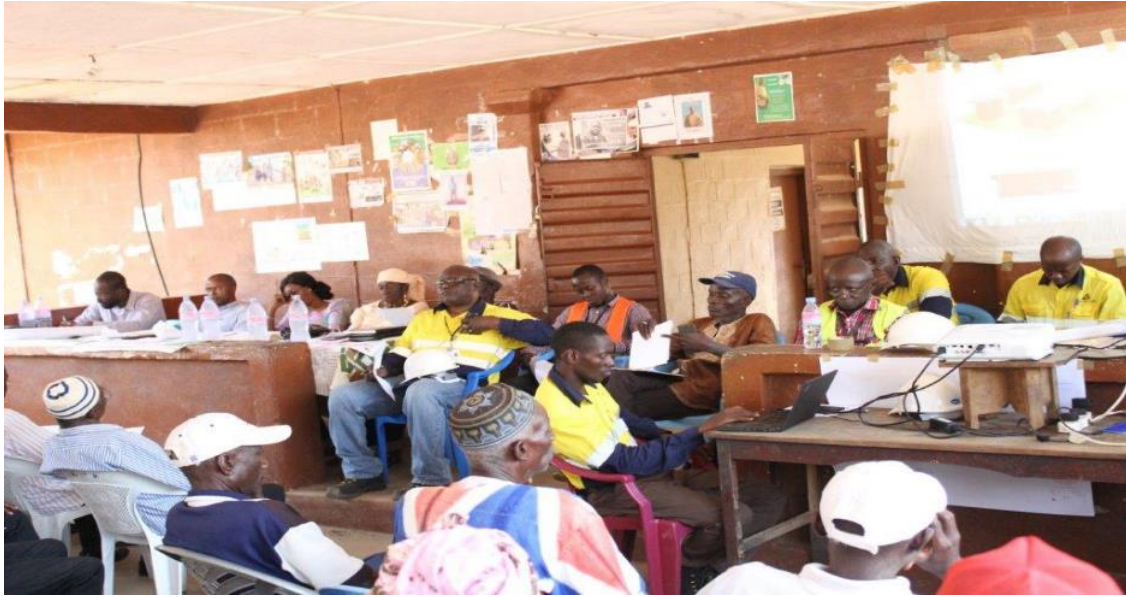


Photo 3: Cross section of key stakeholders including The Paramount Chief of Imperi Chiefdom; EPA and NMA officials, Chief Administrator of Bonthe District Council and SRL employees



Photo 4: The Paramount Chief Madam Hawa Gpanabom IV of Imperi Chiefdom addressing the meeting

2. Agenda - Consultation and Disclosure meeting

AGENDA

- Welcome - Key Stakeholders
- Prayers
- Introduction
- Statement from the following:
 - The Chairman-Chiefdom Speaker Imperi
 - Environment Protection Agency (EPA) – Sierra Leone
 - Chief Administrator (CA)- Bonthe District Council
 - National Minerals Agency (NMA)
 - The Paramount Chief- Imperi Chiefdom
- Presentation - SRL Resettlement Manager
- Questions and Answers
- AOB
- Closing Prayers

A9 Bibliography

- African Development Bank (2003), Involuntary Resettlement Policy. See [www.afdb.org/en/documents/document/ bank-group-involuntary-resettlement-policy-11342/](http://www.afdb.org/en/documents/document/bank-group-involuntary-resettlement-policy-11342/) (last accessed 4 August 2017)
- Asian Development Bank (2016), Involuntary Resettlement Safeguard. See www.adb.org/site/safeguards/involuntaryresettlement (last accessed 14 August 2017)
- European Bank for Reconstruction and Development (2014), Environmental and Social Policy. See [www.ebrd.com/news/ publications/policies/environmental-and-social-policy-esp. html](http://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html) (last accessed 30 December 2017).
- Food and Agriculture Organisation of the United Nations (2009), FAO Land Tenure Series 10: Compulsory acquisition of land and compensation, Food and Agriculture Organisation of the United Nations, Rome. See www.fao.org/
- International Council on Mining and Metals (2012), Community , Development Tool Kit, International Council on Mining and Metals, London. See www.icmm.com
- International Finance Corporation (2012), Guidance Note 5: Land Acquisition and Involuntary Resettlement. See www.ifc.org/wps/wcm/
- International Finance Corporation (2002), Handbook for Preparing a Resettlement Action Plan, International Finance Corporation, Washington D.C. www.ifc.org
- Sierra Leone 2015 Population and Housing Census, Summary Report by Statistics Sierra Leone.
- Sierra Rutile Resettlement Policy Framework (Draft December 2017)
- Sierra Rutile Project Area 1 – Environmental, Social and Health Impact Assessment Social Impact Assessment Report, No. Report Number 515234/SIAD1
- World Bank Operational Policy 4.12 (OP 4.12; World Bank, 2004)
- World Bank Group, Fact Sheet; The World Bank's New Environmental and Social Framework, August4, 2016
- The Constitution of Sierra Leone 1991(As amended in 2001)
- The Sierra Leone National Land Policy (2015) Final Draft (Version 6)
- The Mines and Minerals Act 2009 (MMA 2009)
- The Environmental Protection (Mines and Minerals) Regulations 2013
- The Sierra Rutile Agreement (Ratification) 2002
- The UN Convention on the Safeguarding of the Intangible Cultural Heritage
- The UN Convention on the Protection and Promotion of the Diversity of Cultural Expressions
- The UN Convention Concerning the Protection of World Cultural and National Heritage

Websites

www.sierra-rutile.com

www.iluka.com

www.ebrd.com/news/publications/policies

www.ifc.org

www.icmm.com

www.fao.org

www.who.org

www.go.worldbank.org