

9.0 PROJECT CONSULTATION

Consultations regarding various aspects of the Project have been conducted since 2003 through: (1) contact with various government ministries, departments and agencies (2) ongoing efforts by the Company to engage with, listen and educate Project-affected people in the Study Area and (3) the formal EIA Scoping Process (including Public Hearings). These consultation efforts are described herein.

9.1 GOVERNMENT AGENCIES

Since 2003, Company representatives have held workshops and briefings on the Project for the following entities:

- National ministries, departments and agencies
 - Environmental Protection Agency
 - Ministry of Lands, Forestry and Mines
 - Ministry of Local Government, Rural Development and Environment
 - Ministry of Education / Ghana Education Service
 - Minerals Commission
 - Lands Commission
 - Forest Services Division
 - Land Valuation Board

- Regional and local Government officials and agencies
 - Birim North District Assembly

In 2007, the Company expanded its engagement with local government functionaries to build an understanding of where the Company and local Government could work together to influence the socio-economic advancement of the Study Area. In this effort, the Company periodically briefed the District Chief Executive, District Coordinating Director and members of the District Assembly. These briefings were aimed at improving the understanding of both parties of the impacts and opportunities that the Project could deliver and the benefits that could come from collaborating as partners on development initiatives that will benefit the District. The Company is collaborating with the District Planning Coordinating Unit and has started the process of aligning Company initiatives with those of the District and through OICI, in collaborating with the government's Rural Enterprise Programme which began operation in the District during the year.

A monthly schedule of engagement with the Regional Minister and the Regional Coordinating Council (RCC) was also initiated with the intention of keeping this group updated regularly on programmes and activities of the Project and providing a forum for the Regional Minister and the RCC to share their thoughts on the Project. The Member of Parliament for the area was also briefed regularly on project activities.

The Company has met with several government agencies and commissions to brief them on the status of the Project and solicit their concerns, and discussed the issues, which were raised by EPA in the previous EIS (GRRL 2006) and discuss with them their recommendations regarding the development of the Project. These groups include:

- Forest Services Division
- Wildlife Division
- Water Resources Commission
- Hydrological Services Department
- Fisheries Department
- Ghana Meteorological Agency
- Irrigation Development Authority
- Ghana Highway Authority
- Ghana National Commission on Culture
- Ghana Museum and Monument Board
- Ghana Health Service
- Traditional Authorities/DA

Correspondence and meeting notes outlining the outcome of these consultative meetings are included in **Annex H-I**.

9.2 PROJECT-AFFECTED PEOPLE

The Company has used a variety of communication channels to announce major Project milestones and decision points and to engage the community. The Company believes it is good practice for companies planning and developing new mining ventures to understand and respond to stakeholder concerns. As a result, a community-centred approach has been adopted whereby the Company strives to gain support of stakeholders for the Project, but also involves them in ensuring the enterprise develops for the benefit of everyone.

The Company stakeholder engagement programme provides interested and affected parties and relevant authorities an opportunity to identify issues and concerns regarding development of the Project. Information generated from this process was used to focus the content of this EIS and the Social Impact Assessment (GRRL 2008b) and allow informed decision-making and planning. Additional consultation will occur as the EIS is refined and resubmitted during 2008. The process also assists in identifying ways in which concerns can be addressed and alternatives considered throughout development and operation of the Project.

The Company has undertaken a comprehensive suite of consultation, disclosure activities and stakeholder engagement exercises since acquiring the mining concessions at Akyem. Project stakeholders (individuals, groups, and organisations with an interest in the Project) have been actively engaged in the consultation process since 2003. These consultative efforts are described briefly below.

9.2.1 ADVISORY COMMITTEES

Two general types of committees have been formed in the Study Area and are routinely consulted about the Project.

CROP RATE REVIEW COMMITTEE

The Crop Rate Review Committee was inaugurated by the Regional Minister on December 12, 2002. The committee is mandated to meet annually to review crop compensation rates that apply to Company exploration and project development activities.

COMMUNITY CONSULTATIVE COMMITTEE

The Company established a Community Consultative Committee to increase community participation with individuals from each settlement identified by the traditional leadership to represent their community. Participation of youth and women was encouraged. The inaugural meeting of this committee was held April 15, 2004 at the Company's original Information Centre at the Exploration Camp. In 2004, the frequency of meetings was increased from quarterly to every two months with six meetings held during the year.

The Community Consultative Committee continued to meet on a regular basis during 2005 and 2006. In 2006, participation of the youth increased and membership expanded to include representatives from key Ministries, Departments and Agencies – namely, Town and Country Planning Department, Commission on Human Rights and Administrative Justice and the National Commission on Civic Education.

This committee continued to meet on a regular basis during 2007. Active participation of women was encouraged and membership expanded to include representatives from Health, Education, Water and Sanitation and officers of two government initiatives – the National Youth Employment Programme and the Rural Enterprise Programme. In late 2007, the committee participated in a number of workshops focused on sustainable development.

The Company anticipates that this committee will evolve into two new committees during 2008 – a Community Development Committee, with a focus on Community Development activities, and a Community Advisory Council, with a smaller membership providing community feedback and advice.

9.2.2 WORKSHOPS AND BRIEFINGS

Beginning in 2003, the Company, through both its Accra and Akyem Environmental and Social Responsibility staff, organised workshops and briefing sessions on the Project to selected government agencies, NGOs, and the media as well as the Project-affected communities. Consultation during this period focused on Project development and building good relationships with stakeholders. **Table H2-1 (Annex H-2)** provides details on stakeholder briefings and workshops.

9.2.3 COMMUNITY-BASED CONSULTATIVE PROGRAMMES

MINE SITE VISITS

Beginning in 2004 and continuing to the present, the Company has provided tours of other mines in Ghana, including its own Ahafo Project in the Brong Ahafo Region, to allow community members to see for themselves mining and its potential positive and negative impacts. In addition, community members have been introduced to the various programmes implemented at these mine sites to mitigate impacts and provide improvements. These mine tours have also served to build understanding of the opportunities and pre-requisites for doing business with the Company and thereby assisting candidate contractors to develop strategies for submitting bids for the numerous construction contracts that may come up during the construction stage of the Project. **Table H2-2 (Annex H-2)** provides details on community mine site tours.

Plans and budget are in place to allow for between 10 and 12 escorted visits by Project-affected people to visit the Ahafo Project in 2008 to see for themselves what the Company is planning and doing.

COMMUNITY INFORMATION CENTRES

In an effort to reach out further into the communities and provide easier access to give and receive information, Community Information Centres were established in each of the Project-affected communities in 2006. It is expected that the range of services and information available at these centres would continue to evolve with time and would likely include the following services:

- Complaint and grievance registration,
- Project information sharing,
- Employment registration and queries,
- Newsletter distribution,
- Resettlement and compensation information sharing and
- Community health information sharing – particularly with regard to malaria and HIV/AIDS.

Consideration is also being given to distributing crop compensation payment chits from the Community Information Centres rather than requiring farmers to visit the exploration office to collect the paperwork.

SCHOOLS ENGAGEMENT PROGRAMME

The aim of the schools engagement programme is to generate interest and awareness of students about the presence of the Company in Akyem, its mission as well as its activities and operations. Fifteen Junior Secondary Schools in the Project-affected areas were introduced to the concepts of the mining process and also discussed articles published in *Akyem Amanie*, the Company's newsletter. The schools are targeted because it is believed

that when the students understand the processes, they will be in a better position to explain to their families what the Project development means for them as well as position themselves to become better future decision-makers.

During 2007, the second phase of the schools engagement programme intensified at the Junior Secondary Schools in the Project-affected communities. The Junior High School students have also been included in the *Akyem Amanie* distribution list. Quarterly editions were distributed and discussions held to assess their comprehension and encourage reading. Various mining words and their meaning were also discussed.

The Company also sponsored 'edutainment' sessions aimed at socializing with school children from all the 15 Junior Secondary Schools in the Study Area. The sessions included a quiz programme and a football gala fun game designed to sustain students' interest in the Company's schools programme.

Also in 2007, the Company introduced an environmental science programme for students of the New Abirem/Afosu Senior Secondary School. The main objective of the project is to provide opportunities for students to further their interest in the practical application of science, contribute to the raising of educational standards in the area, provide better understanding of the Company's environmental control measures and increase community participation in the Company's activities.

OICI extended their work into the Junior Secondary Schools through their "clean hands" initiative which is being undertaken as part of a wider Water and Sanitation improvement programme.

9.2.4 MEDIA

COMMUNITY NEWSLETTER

In June 2005, the Company began publication of a community newsletter, *Akyem Amanie* (Akyem News), which reports the Company's activities during the period and gathers public comment on Project-related activities. The main objectives of the newsletter are to educate, inform, entertain and discuss pertinent project milestone and activities by serving as an avenue for the sharing and dissemination of information among all stakeholders, and in particular, the Project-affected communities and Project employees and contractors.

Akyem Amanie continues to be published, with three editions disseminated in 2007. Following the implementation of recommendations from a readership survey conducted in the early 2007, circulation has doubled to allow a wider audience to have access. The Company plans to continue publication during 2008. The most recent copy of *Akyem Amanie* is included in **Annex H-3**.

MEDIA RELATIONS

The Company views the media as an important stakeholder and as a partner in the effective dissemination of timely, balanced and factual information about the activities of the Company. The Company seeks to proactively and effectively engage with the media at the

local, regional and national level, in relation to achieving balanced media coverage and reporting and in relation to ensuring the transparent and responsive communication of issues.

The Company aims to achieve this using a number of approaches and activities:

- Determining the appropriate types of media, including radio, television, newspaper and internet to be used for engagement,
- Engaging the media in a transparent, responsive and consistent manner and for the mutual benefit of both the company and the communities in which it operates,
- Maintaining an effective and proactive approach to engagement with the media,
- Defining the protocols for addressing media coverage and queries pertaining to the Company,
- Encouraging coverage of balanced and newsworthy stories and activities,
- Providing timely information, statements and other relevant information to the media as approved by senior management and
- Providing timely information to internal stakeholders at the appropriate level to allow proactive issues management.

In view of the foregoing, a comprehensive media management plan was developed and implemented by the Company in 2007. Engagement efforts include quarterly briefing sessions, quarterly courtesy calls, media coverage of showcasing events, a media tour of the Akyem Gold Mining Project Area and an open door policy that ensures balanced reporting occurs and trust is built.

9.2.5 LOCAL CONSULTATIONS

CONSULTATION WITH TRADITIONAL AUTHORITIES

In 2005, the Company adopted a formal framework for its engagement strategy with Traditional Authorities. Consultation with the Traditional Authorities continued in the same manner in 2006 and 2007, as summarized in **Table H2-3 (Annex H-2)**. These consultation meetings were organised as often as possible to discuss Project development issues of concern to the Traditional Authorities.

CONSULTATION WITH YOUTH ORGANISATIONS

In 2005, the Company developed a comprehensive youth engagement communication strategy to map out the youth groups and to start familiarisation with the groups and associations. In all, 39 youth groups and associations were identified, most of which are religious-based. A briefing session was held for the identifiable youth leaders and executives in the area.

As part of the strategies to strengthen youth groups, OICI intensified group dynamics training and encouraged them to organise themselves and establish visions, goals and objectives. As a result of these efforts, two new youth organisations were registered with the District Assembly during the year. A two-tier programme of engagement was implemented, with quarterly briefings for youth leadership and bi-weekly meetings with youth, with the latter programmes held in the community information centres. Specific activities held to enhance interactions with members of youth groups are reported in **Table H2-4 (Annex H-2)**.

CONSULTATION WITH FARMERS AND LANDLORDS

The Company has intensified its farmer engagement programmes in an effort to reach as many farmers as possible in the consultative process. Making the effort to engage with the farmers was considered to be one of the key strategies adopted to reduce the risk of dissatisfaction and unrest during the Project development stage. As of December 2007, 62 farmer consultation and engagement meetings were organised for 1,352 farmers and landlords in the Project-affected communities, with 382 having attended more than one meeting. Various issues discussed during the consultation meetings included: crop compensation; construction employment process; farm validation; Livelihood Restoration Programmes; and group dynamics trainings. A suitable environment was created for farmers to contribute and participate in the discussion and this has strengthened the understanding between the farmers and the Company by holding the meetings at Company Information Centres on dates which coincide with non-farming or “taboo” days.

CONSULTATION WITH RELIGIOUS LEADERS

The programme of quarterly briefing sessions for religious leaders was implemented in 2006 and continued through 2007. These sessions help to keep respected community and opinion leaders informed and consulted on Project-related issues, programmes and activities. Most community members rely on some of these people for pertinent decision-making because of the trust and respect they command in the area. As of March 2007, three meetings had been held, involving 13 religious leaders.

CONSULTATION WITH OTHER FOCUS GROUPS

The company has continued to broaden the range of stakeholder engagement to include local business suppliers, teachers and artisans. The programme has been run by the Community Liaison Officers in the less formal setting of the Community Information Centres. A total of 14 meetings with 314 attendees were held during 2007.

COMMUNITY DURBARS

In 2007, the Company implemented a coordinated and systematic approach to sharing information with a wide audience through quarterly community durbars in each of the eight Project-affected communities. The durbars presented community members with Project information and provided a venue for comment and feedback. The platform was shared at different times with representatives from the Ghana Health Service and Ministry of Food

and Agriculture to talk about HIV/AIDS and agricultural improvement programmes respectively. Between July 2006 and November 2007, the Company held 41 durbars which were attended by 1,356 Project-affected people.

CAPACITY BUILDING

OICI initiated training of groups in organisational, meeting and negotiating skills in 2005. The first programme was made available to members of the Community Consultative Committee and resulted in 30 attendees, representing 83 percent of the membership. Programmes were subsequently initiated in Project-affected communities – Afosu, New Abirem, Yayaaso, Mamanso, Old Abirem, Hweakwae, Ahausena, and Ntronang - targeted at increasing the ability of residents to engage effectively with the Company. A total of 149 people completed the programmes during the year.

In 2006, OICI organised three programmes on Financial Management, Group Dynamics and Small and Micro Enterprise which trained 1,424 people in the Project-affected communities. Most people attended more than one of these training programmes. OICI also organised training in agricultural technologies including: Grasscutter Domestication; Small Ruminants Production; Snail Rearing; Vegetable Production; and Soap Making. The training was organised for various farmer associations as well as for individual farmers, benefiting 256 Project-affected people.

OICI continued their training of groups in organisational, meeting and negotiating skills during 2007. Apart from the Project-affected people who continued to receive training, the newly elected District Assembly and Unit Committee members also benefited from these training programmes. Demonstration farms have been set up for farmers to share best farming practices and successes with their colleagues. An open day for farmers to exhibit their products and share their experiences was organised for other farmers to view and emulate best practices for success.

9.3 SCOPING PROCESS

On November 2, 2004, over 200 local residents attended a scoping meeting hosted by the EPA to obtain formal public comment on the Project. The outcome of this consultative effort was a Scoping Report, including Terms of Reference (GRRL 2004). EPA held a second public meeting on June 28, 2005 in Yayaaso to summarize the design of the Project and disclose the results of the second Draft EIS (GRRL 2005a). The Company Senior Community Liaison Officer presented the results of the draft EIS in Twi to enhance public understanding. Over 200 local residents attended this second meeting and the traditional authorities of each settlement in the Study Area were asked to address the findings of the Draft EIS (GRRL 2005a). A third public meeting was held by EPA in Yayaaso on July 4, 2008 to disclose the results of the April 2008 IES (GRRL 2008a) and receive public comments. Approximately 1,000 people attended this meeting.

During these public meetings, representatives of each settlement were encouraged to state any concerns about the Project before the EPA considered issuing an environmental permit. The Paramount Chief of the Kotoku Traditional Area based at Akyem Oda also attended the second meeting and made a statement.

Key issues (Terms of Reference) identified during the consultation process described above are presented in **Table 9-1**.

TABLE 9-1		
Summary of Issues/Impacts Raised During the 2004 Stakeholder Consultation Process		
Issue Theme	Stakeholder Group Raising Issue	Issue/Impact Summary
Land - Tenure - Compensation - Rehabilitation - Closure	NGO	Ownership of land is a complex issue and should not just be seen as <i>de juré</i> government ownership. Connection to the land is historic and emotional as well as being the predominant material object that can be handed from one generation to the next.
	Local residents	Destruction of land, even when compensated, is a significant issue and rehabilitation and end-use should be carefully examined. What to do with rehabilitated land must be decided at an early stage and included into compensation discussions. The issue of “land for land” must be considered (even though land is scarce) as there could be livelihood and food security risks involved in moving a subsistence community completely away from farming – even with assistance of development consultants looking at future potential activities for those who have lost land – particularly considering the relatively low levels of education amongst affected communities.
	Local residents; District Departments; NGOs	Compensation will be an emotive and conflict ridden issue. Already there is confused understanding about how the process is decided; who is involved in determining values; who is involved in assessing crop destruction; and whether the Company’s count is the one to trust. In general, compensation is seen to be low as people consider that it should take the future into account – including future generations’ access to land use. Compensation must consider that many people owe money to the GOPDC which must be paid during the compensation process. It is not clear what other conditions the GOPDC might impose for people who sell their crops.
	Scoping hearing	Compensation must be high; land should be valued at 1 billion (2004) cedis per hectare. The Company should donate generously to local festivals.
	Local residents; District Departments	The Company needs to produce a compensation policy that is presented to all communities in an accessible way (detailing procedures, meetings, steps to get compensation etc.)
Employment	Local residents	The demand for employment is very high and is seen as a form of compensation to those losing land and productivity.
	Local residents	The process of employing needs to be set down in an agreed upon policy and followed with rigor to ensure fairness. Each village sees other villages as getting preferential treatment.
	Local residents	A positive aspect of employment is that people feel that it will give their children a reason to stay in the area rather than having to leave to find work.
	Scoping hearing; Local residents; NGOs	Employment opportunities for local youth are very important. Sustainable livelihoods is based on agricultural background. Employment of women must not be overlooked, and labor-intensive operations should be used to maximize job opportunities wherever possible.
Process and Communication	Local residents; NGOs; District Departments	There is an awareness of and emphasis on informed, transparent and participative participation at all levels of community involvement. This pertains to how the Company deals with the Chiefs and elders as well as dealing with local residents on policy and day-to-day activities.

TABLE 9-1 (continued)		
Summary of Issues/Impacts Raised During the 2004 Stakeholder Consultation Process		
Issue Theme	Stakeholder Group Raising Issue	Issue/Impact Summary
Process and Communication (continued)	Local residents; NGOs; District Departments	Any activities that take place in people's fields need to be done with a new approach to communication. Reasons for activities need to be spelled out in advance and warning must be given before surveyors enter farms or mark properties.
		Conflict WILL arise if people do not feel that they have been fairly and respectfully treated. Already, there are threats of resistance to the Company activities. The Company employees should receive cross cultural training to ensure that they do not offend local residents. Purification rituals before mining could be a mitigation measure.
		Ongoing communication between the Company and communities will benefit everyone and communication should also be regular between the Company and District Departments to ensure an integrated and efficient process.
		All communication needs to be documented and returned to communities as a resource for the future and so that the Company commitments are transparent and accessible to ordinary members of the community.
Perceptions and Expectations	EPA; District Departments; Local residents	High expectations regarding project related benefits exist at both government and local community levels. There is also a lack of trust that the Company will fulfill its commitments and benefits will accrue.
		Some expectations identify areas of social responsibility for the Company while others emphasise partnership approaches in sustainable benefits.
		The project team must continue to work towards containing expectations and to emphasising local initiative as an important component of community-company relationships. Unfulfilled promises or expectations can lead to stress on the local community.
		Expectations include the Company's assistance with education, health, electricity, roads, wide-spread employment and training. It is important that the Company not take on the responsibilities of the government to provide services.
Social Responsibility	Local residents	The Company has made a commitment to socially responsible development. This needs to be defined as a policy that is accessible to everyone.
		Various groups within communities need to be kept in mind for particular development initiatives. The youth and women are of particular concern, as they will impact on the long-term sustainability of initiatives while the aged are a particularly vulnerable group regarding land-take issues and loss of access to food security.
	District Departments; Local residents	Loss of access to farming land must be carefully addressed at the different levels at which people are affected. Trying to encourage diversity in activities may not be sustainable for individuals and could lead to impoverishment and loss of livelihood. People are concerned about hunger and poverty as a result of losing their farming land. Keeping the psychological state of people in mind is an important social responsibility during the various phases of the project. Particular pressure related to uncertainty is currently a high impact on people.
		There is need for development in local communities – including education; health; water and sanitation infrastructure; and electricity. Spin-offs from the project could establish infrastructure that would benefit local communities. Current lack of infrastructure is a hurdle to development and long-term sustainability of development initiatives in the area.

Issue Theme	Stakeholder Group Raising Issue	Issue/Impact Summary
Development and Infrastructural Needs	Scoping hearing	Infrastructure development could be achieved through partnerships with District level departments and local communities, emphasizing that initiatives and prioritization should come from communities and not the Company. Initiatives must be sustainable beyond the life-of-mine or communities could be left worse off after mining than they are at present.
		Concern about the impacts of inflation on housing and food costs.
Social Change	PPAG; Small number of female residents	Understanding the social context in which the project will take place is important in identifying the impacts and planning mitigation.
		Changes in social fabric of local settlements need to be considered, and while not the direct responsibility of the Company, these issues must be addressed to whatever extent possible by the Company. The influx of outsiders to the area, along with increased cash, could have repercussions around sexually transmitted diseases, increased crime and increased family violence, amongst other changes.
		There could also be improvements in some people's standards of living as a result of the increased economic activities in the area.
Environment - Forest - Water - Air - Health and Safety	District Departments; Local residents	Concern for environmental impacts, particularly to water and forest habitat has been expressed. Alternative water sources must be provided where pollution occurs. Dust and noise pollution from blasting and transport activities must be managed. People's safety from blasting must be ensured.
		Rehabilitation must be properly carried out so that the land is fertile and useable after mining. The land is seen as being for future generations and should be treated as an important resource.
	Local residents	Residents wondered if the mining would change the local climate, decreasing the amount of rainfall and impacting the forest.
	Scoping hearing	Protection of water bodies and water sources.
Assessment of Alternative Development Options - Mining - Agriculture - Indigenous Forests	NGO; Local Residents	An assessment of various alternatives (mining, agriculture, forestry) should be undertaken to get a clear financial and non-financial indication of values to local communities and to Ghana at the National level. A number of people questioned the financial and social wisdom of permitting mining over other existing land uses.
Legal and Policy	NGO	The legislation and policies pertaining to mining; direct foreign investment and royalties need to be clearly understood.

Source: GRRL (2004).

Note: GOPDC = Ghana Oil Palm Development Company; PPAG = Planned Parenthood Association of Ghana; NGO = Non-Government Organisation; EPA = Environmental Protection Agency (Ghana).