



Environmental and Social Impact Assessment Yaoure Gold Project, Côte d'Ivoire Community Health and Safety Management Plan



Submitted to

Perseus Yaoure SARL

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1 INTRODUCTION

The scope of the Community Health and Safety Plan addresses Perseus's commitment to:

- Mitigate potential impacts of Project related activities that may affect the health and safety of communities within the areas of influence and along the transportation route;
- Maintain a healthy workforce and labour pool in the community; and
- Contribute to the improved health, safety and wellbeing of the local community in the areas of influence.

In many respects, the programs within the scope of Community Health and Safety Plan will inform the Social Management Plan. The plan will be implemented at the beginning of the construction phase and continue to the end of the Project life. The plan has been informed by the provisions of the IFC Performance Standard and Guidance Note 4 (Community Health, Safety and Security), international best practice, and the impact assessment (Project ESIA).

The Community Relations Department will be responsible for the Community Health and Safety Plan with input from the Health, Safety and Environment Department.

The Community Health and Safety Plan is currently conceptual and dynamic in nature and will continue to be developed and modified in consultation with all relevant stakeholders, including but not limited to government and community, throughout the lifecycle of the Project.

1.1 Relation of the Community Health and Safety Plan with Other Management Plans

The Community Health and Safety Plan is related to, overlaps, shares objectives or can supplement strategies with the following management plans of Perseus:

- Community Development Plan;
- Stakeholder Engagement Plan;
- Livelihood Restoration Plan;
- Influx Management Plan;
- Procurement Plan;
- Security Plan;
- Traffic Management Plan;

- Occupational Health and Safety Management Plan;
- Emergency Preparedness and Response Management Plan;
- Water Management Plan;
- Air Quality Management Plan; and
- Closure and Rehabilitation Management Plan.

Some plans named above are related to disciplines where no significant impact on communities is currently expected, such as air quality. However, these disciplines remain related to this Plan for monitoring and follow-up purposes.

1.2 General Strategy for Mitigation

In terms of community health and safety, Perseus's strategy is to implement programs that contribute to the maintenance of a healthy workforce and local community and protect against potential negative health effects of the Project within the areas of influence. As such the following programs have been identified for possible implementation:

- Health Services Program;
- Disease Prevention Program;
- Community Health and Safety Awareness Program;
- Positive Lifestyles Program;
- Subcontractor Integrity Program;
- External Emergency Response and Preparedness; and
- Security with Integrity Program.

Note that the Emergency Response and Emergency Response and Preparedness Plan are provided as separate appendices to the ESIA, however, strategies for community awareness are integrated within the Community Health and Safety Awareness Program below.

The underlying principles that guide the approach and implementation of Perseus's Community Health and Safety programs are:

- Accountability and transparency – understanding that confidentiality of health data overrides any need to demonstrate vulnerability in a population, sub-population or individual. Planning and implementation of social management is conducted in an environment of accountability and transparency, with the

disclosure of agreements, general monitoring results, and processes to relevant stakeholders;

- Confidentiality – Handling and monitoring of health data is conducted in an environment of confidentiality to an international standard of medical ethics;
- Equity assurance – administering actions to benefit all members of a vulnerable sub-population, avoiding discrimination, and avoiding personal identification of any individual who may be at risk;
- Leveraging – as disenfranchised communities are identified, Perseus will consider leveraging or focusing other programs to these sub-populations in an effort to assure some equity in Project impacts;
- Cultural context – Action Plans are culturally appropriate and based on clear understanding of affected people's expectations, basic needs and vulnerabilities;
- Evidence-based health management planning – The Community Health and Safety Management Plan is developed from a clear understanding of Project impacts and risks and affected communities at all stages of the Project lifecycle;
- Participatory planning for development and implementation of detailed action plans – where possible, planning, implementation and monitoring of health management actions are undertaken in partnership with affected people, organizations from government and civil society that are able to provide insights to identify possible causal pathways;
- Flexibility in implementation – health management implementation is recognized as necessarily flexible and subject to change, in response to on-going engagement, data collection and monitoring results, and emerging challenges; and
- Balanced internal responsibility for implementation – responsibility for the implementation of the Community Health and Safety Management Plan will be shared between the Project's Community Relations Department, the Safety, Health and Environment Department; and all other departments and staff whose activities may affect or impact local communities.

Note: Funding for all commitments of Perseus described in this Plan will come from the Community Development Fund and will be allocated by the communities according to their priority where possible. Perseus will endeavor to assist the communities in this prioritisation process.

2 COMMUNITY HEALTH AND SAFETY MANAGEMENT FRAMEWORK

2.1 Health Services Program

The health services program will enhance and monitor effective change in access to health, and any linkage to health status in general and in terms of the area of influence and specific communities and subpopulations (e.g. women, girls, children, in-migrants, artisanal miners) within this area. The health services program will use environmental, social, economic and health data to continually track and evaluate the changing vulnerability of communities within the area of influence so that action can be focused on the most vulnerable communities at any given time.

Perseus will work with local government to identify any necessary follow-up actions if health status is negatively affected by the Project in areas of influence. Possible actions may include supporting provision of affordable health services, including mobile health outreach clinics within in the areas of influence.

Perseus understands the potential consequences of breaches of medical ethics, including the potential for direct and indirect discrimination of, and violence against, affected persons. Health data must be confidential to the individual and health professionals only. To minimize breaches of confidentiality, Perseus will identify opportunities for collaboration with local governments and communities to develop or share in third party health data collection and reporting for the communities in the areas of influence. In any case, Perseus will set clear expectations and protocols for the management of medical data to prevent access to, and disclosure of medical data to, non-medical employees, managers or others. Perseus will carry out a continuous risk assessment of the procedures in place, monitor its medical staff, and identify any necessary corrective or preventive actions for continuing operations.

At closure, Perseus will work to maximise likelihood of continued improvement to general health and wellbeing post-closure. Under the Social Management Framework (separate Appendix to the Project ESIA), Perseus will work with local government to identify options to protect and enhance the health of communities in the areas of influence post-closure. During the closure phase, Perseus will transfer knowledge of general health status, trends in health status over the life of the Project, and predictions for changes in health status for different post-closure scenarios to the government.

2.2 Disease Prevention Program

The Disease Prevention Program will focus on methods to reduce of community exposure of disease. The program will be delivered through active mitigation (e.g., limiting bodies of stagnant water), development support in nearby communities, and community awareness. The program will be informed by health monitoring

2.2.1 Malaria

Malaria reduction campaigns will be applied consistently throughout the Project duration and will include awareness of linkages between stagnant water and malaria, including through poor sanitation conditions. Perseus will encourage good sanitation practices, and the use of mosquito nets throughout the area of influence. Perseus will support development of local knowledge and on the exposure pathways and determinants of exposure in vulnerable communities. The Health Services Program will inform the Disease Prevention Program of the most vulnerable communities (with highest malaria incidence) for prioritized action. Actions and lessons learned in the areas of influence will regularly inform Occupational Health and Safety training.

2.2.2 Sanitation and water supply

Perseus will support the development of improved sanitation and improved water facilities. Through stakeholder engagement, Perseus will encourage people to construct, adopt and properly use improved sanitation and water facilities. Focus groups with local government, existing communities and in-migrants may be implemented to help knowledge exchange and establish common expectations for sanitary conditions in the areas of influence.

The facilitation and dissemination of information on the linkages between improved water sources, sanitation conditions and human health, and on good hygiene practices, will promote use of the improved facilities and minimize the increased incidence of water related disease and food-borne illness in the areas of influence.

On-going monitoring of health and health impact pathways (e.g., number of bodies of stagnant water, number of people with access to improved sanitation facilities) will be implemented with regular feedback to those affected.

Health awareness campaigns will be applied consistently throughout the Project duration and will include awareness of:

- Linkages between improved water sources, sanitation conditions and human health;
- Common water related disease and food borne illness rates in the areas of influence;
- Good hygiene practices;
- Benefits to properly using the improved facilities; and
- Evidence of improvement in target communities to encourage adoption in other communities.

2.2.3 Sexually Transmitted Diseases

Stakeholder engagement activities will include culturally specific and gender specific awareness education about incidence of sexually transmitted diseases in the areas of influence, information on pathways of exposure, and any local evidence to aid acceptance of this information and dispel current myths about causes of HIV/AIDS.

Perseus will assist communities in developing education materials such as those using anecdotal epidemiology that would aid increasing acceptance of evidence based research and facts regarding HIV/AIDS.

2.3 Community Health and Safety Awareness Program

2.3.1 Traffic Safety Awareness

Stakeholder engagement activities, a good communication strategy, as well as monitoring and management plans will help Perseus prevent potential negative impacts resulting from a poor in-country safety culture. These actions include the following:

- Clear expectations regarding road safety culture, road safety behavior and road safety training, provided to workers and contractors;
- On-going monitoring of traffic safety (e.g., near misses, reports from communities, reports from project traffic) with regular feedback to those affected; and
- Knowledge transfer to workers and affected communities regarding road user awareness with advice on strategies for interacting with industrial traffic.

In addition, Perseus will promote traffic safety awareness in communities with the Direct Area of Influence and along the transportation route. Road users may be able to complete safe driving courses.

2.3.2 Hazardous Materials Management and Safety Awareness

Perseus will provide hazardous materials management safety communications to communities in the areas of influence to deter workers, their families and others from collecting, reusing, recycling or reselling Project waste. Communications will include examples of hazardous materials used in Project construction, operation and rehabilitation, the risks to human health, and appropriate methods of use and disposal.

During the closure phase, Perseus will disseminate information on residual site hazards, including the hazardous materials in the closed TSF and hazardous material waste disposal site (landfill). Awareness training will include dissemination of information relating to the lack of viability for gold recovery in the tailings and the potential impacts of damaging the soil cover, which would jeopardise the rehabilitation success and expose the communities in the areas of influence area to unnecessary and preventable health and environmental risk.

2.3.3 Emergency Response and Preparedness Awareness

During each Project phase, Perseus will communicate potential hazards, potential emergency scenarios, and health risks associated with emergency scenarios. Consultations will be held with communities and community leaders in the areas of influence and along the transportation route, and specific emergency response and preparedness measures will be determined.

2.4 Positive Lifestyles Program

Through the Community Development Plan, Perseus will encourage culturally appropriate positive lifestyle choices in an effort to:

- Establish good financial management choices;
- Deter an increase in alcohol use, substance abuse and tobacco use;
- Avoid violence against women, including sexual violence;
- Avoid ethnic- or religious- based violence;
- Adopt good hygiene practices and sanitation; and
- Reduce the potential for STDs.

Awareness campaigns may be conducted within the workplace and at religious institutions, local governments, schools, and health clinics.

2.5 Subcontractor Integrity Program

Perseus will be clear about its expectations of subcontractors during all phases. Perseus will continually monitor and evaluate companies' performance, including performing spot checks on-site, to ensure that the expected level of safety culture is being adhered to. The subcontractor integrity program will be far reaching and include, but not be limited to performance regarding the following:

- General traffic safety;
- Hazardous materials management, including transportation of cyanide (Cyanide Code);
- Occupational health and safety; and
- Adherence to construction standards.

2.6 External Emergency Preparedness and Response Planning

Apart from the Internal Emergency Preparedness and Response Plan of Perseus, it is good practice that Communities develop an External Emergency Preparedness and Response Plan. Perseus will work with local authorities to strengthen the national emergency response network in the areas of influence and support the development of a project specific external emergency preparedness and response plan.

The following aspects of the External Emergency Preparedness and Response Plan will be jointly addressed by Perseus and community and government representatives:

- Definition of information and notification chain(s) within government/regulatory agencies (who needs to be informed, who has which responsibility and access to/control over resources), following notification of the authorities by Perseus that an emergency situation has occurred;
- Media information chain (local radio) – such as warnings of water pollution downstream;
- Evacuation procedures for the local affected population;
- Awareness of operations and their risks and preparedness to respond (e.g., sufficient stocks of CN antidote, sufficient capacity of beds in local hospital);
- Preparedness of state/community emergency response teams (fire brigade) and awareness of risks and potential emergency scenarios, availability of PPE adequate for specific risks such as respirators, full-body suits etc.;
- Knowledge of site plan by ambulance teams (fastest access to critical points such as process plant, CN briquette storage, explosive storage);
- Training requirements of key people (police, ANDE/CIAPOL, hospitals and local health centres) and alignment of their training plans with Perseus training plans;
- Commitment to coordinated emergency drills between Perseus and police, fire fighters, ANDE/CIAPOL, etc., and aligned plans for drills; and
- Nomination of community representatives in the preparation of the external plan, and in the planning of and participation in, drills.

2.7 Security with Integrity Program

The operations and selection of the Project's security personnel will be guided by the relevant provisions of IFC Performance Standards 2 (Labour conditions) and 4 (Community Health, Safety and Security) and the associated Guidance Notes:

- Security will be provided in a manner that does not jeopardize the community's safety and security, or the client's relationship with the community;
- Security personnel may not be used to force or extract work from workers;
- Perseus will carry out a continuous risk assessment of the security arrangements in place, monitor its security personnel, and identify any necessary corrective or preventive actions for continuing security operations;
- Security arrangements will follow the principle of proportionality, respect for human rights, and good international practice;
- Perseus will ensure that those providing security are not implicated in past abuses;
- Perseus will provide adequate training in the use of force and appropriate conduct toward workers and communities;
- Perseus will ensure that security personnel act within the applicable legislation of Côte d'Ivoire;
- Perseus will not sanction any use of force except when used for preventive and defensive purposes in proportion to the nature and extent of the threat;
- Perseus will provide a grievance mechanism to express concerns about the security arrangements and acts of security personnel;
- If security personnel are permitted to use force, instructions must be clear on when and how force may be used, specifying that security personnel are permitted to use force only as a matter of last resort and only for preventive and defensive purposes in proportion to the nature and extent of the threat, and in a manner that respects human rights;
- Security personnel will be instructed to exercise restraint and caution, clearly prioritizing prevention of injuries or fatalities and peaceful resolution of disputes. The use of physical force will be reported to and investigated by Perseus;
- Any persons injured as a result of the action of security personnel will be transported to medical facilities;
- The instructions for security personnel will make clear that arbitrary or abusive use of force is prohibited; and
- Unlawful acts of any security personnel will be reported to the appropriate authorities.

Perseus may seek support from government authorities and appropriate non-governmental organizations (NGOs) to aid preventative planning, evaluation, monitoring and follow-up to ensure security services providers meet Project expectations. Support may include strategies to identify and manage presence of ex-combatants and ex-military personnel within the community and within the Project security services.

Perseus's security services' responsibilities will include preventing hazardous materials or waste from leaving the Project site or the hazardous waste disposal site for the Project.

Perseus will endeavour to monitor in-migration trends and vulnerability indicators through interaction with the community, including incidence of sexual violence and perceived security. Recording good social and health performances in the study area is key to protecting community security and lowering the potential for conflicts and acts of violence in the Direct Area of Influence and Indirect Area of Influence.

Perseus will need to establish mitigation measures in relations to engaging and partnering with local stakeholders, such as supporting the extension of policing services at the sub-prefectural level to prevent the intensification of violent conflicts

3 MONITORING AND MAINTENANCE

3.1 Confidentiality Requirements

Perseus will ensure health data are handled to an international standard of medical ethics. Health data is confidential to the individual and health professionals only. Perseus will assure that data is stripped of all personal identifiers before dissemination to other (non-medical) company employees or external bodies, reducing the potential for any internal or external discrimination of employees or community members. Sample size and relative risk of personal identification will need to be taken into account before combined health data is published internally and externally. Perseus understands that confidentiality of health data overrides any need to demonstrate vulnerability in a population, sub-population or individual.

3.2 Community Health Monitoring

Community health monitoring will include monitoring of exposure pathways as well as disease. Regular feedback to local communities will be important to provide evidence and encouragement for long-term adoption of positive health related behaviours.

Perseus will identify opportunities for collaboration with local governments and communities to develop or share in health data collection and reporting for the communities within the areas of influence. Data would preferably be collected and analyzed by community and gender, age and socio-economic or other health-associated status if data size allowed and is protective against confidentiality breaches.

3.3 Audit

Perseus will conduct an annual internal community health and safety audit to evaluate the ethical compliance, comprehensiveness and effectiveness of the Community Health and Safety Plan. Periodically the plan will be audited by qualified external auditors to verify the internal auditing.

4 REVIEW AND UPDATE

The Plan shall be regularly updated, taking into account the following aspects, as applicable:

- Updated Project design;
- Change in project phase;
- Operational experience;
- Ongoing stakeholder consultation;
- New regulatory requirements and changed legislative framework; and
- Emerging social change and community health issues such as new communicable or non-communicable diseases.

There is no authoritative guidance on the frequency of the updates, however in line with international best practice, 3 years would be advisable, and more often if major changes have occurred.

Responsibility for the update lies with the Community Relations Manager, in cooperation with other department managers such as the SHEC Manager.