RISK MITIGATION PLAN

Karrau Mining Demo Site
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About Indigenous Peoples and Responsible Mining (IPRM)

With support from the Norwegian Agency for Development Cooperation (NORAD), Conservation International-Guyana (CI-Guyana), is implementing a project aimed at working with Indigenous People and Local Communities (IPLCs) and key stakeholders across the natural resources management sector to promote good practices that enable responsible mining and reduce deforestation in Guyana.

The goal of the project will be accomplished with the rights of IPLCs secured and protected, livelihood options improved and IPLC capacity to manage their natural resources and maintain ecosystem services increased. The project is titled, “Empowering Indigenous People and Local Communities in Guyana to combat deforestation caused by mining” but will be referred to Indigenous Peoples and Responsible Mining (IPRM).

This project is part of a wider Responsible Mining Initiative – RMI, which aims to facilitate sustainable, low carbon and climate resilient development through a responsible mining sector and is being harmonized with GEF-funded sister project, “A supply chain approach to eliminating mercury in Guyana’s ASGM sector: El Dorado Gold Jewelry – Made in Guyana”.

About Karrau

Karrau is on the mainland, located on the Lower Mazaruni River in Region 7, with its neighbours Goshen (Region 10) and Batavia (Region 7). The Village is located five to eight minutes via boat from Bartica, which is the nearest township. Karrau serves as the gateway to the interior, which goes all the way to the border between Venezuela and Guyana.

The titled Village is under the Village Council headed by Toshao Shane Cornelius. Karrau has approximately 530 residents with mixed ethnicities, with the majority being Amerindians. The main economic activities of Karrau include logging, mining, poultry rearing, cash crops and ground provisions farming and small businesses.

Under the IPRM project, Karrau has prepared its Village Sustainability Plan (VSP) using a participatory process over a period of several months. A village planning team was identified to lead the analysis and preparation of the VSP and drafts of this plan were circulated with the wider community for inputs before finalisation, which consisted of a final review process by the Village Council, and a presentation of the plan to the wider community for their input and final approval. Karrau identified mining demonstration site as one of the priority projects for the village.

The Selection Criteria and Assessment during the VSP process for the mining demo site was:

<table>
<thead>
<tr>
<th>#</th>
<th>Criteria</th>
<th>Eligible</th>
<th>Not Eligible</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Land Tenure</td>
<td>Yes</td>
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<td>2</td>
<td>Willingness to embrace new technology</td>
<td>Yes</td>
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<td>3</td>
<td>Willingness to contribute resources (cash/in kind)</td>
<td>Yes</td>
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<td>4</td>
<td>Willingness to accommodate exchanges with sector stakeholders</td>
<td>Yes</td>
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<td>5</td>
<td>Willingness to all research and sharing of non-commercial data</td>
<td>Yes</td>
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<td>6</td>
<td>Accessibility (for miners – large numbers)</td>
<td>Yes</td>
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<td>7</td>
<td>Proximity to large number of miners</td>
<td>Yes</td>
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<td>8</td>
<td>In proximity to willing “influencers” (shops, other service providers)</td>
<td>Yes</td>
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<td>9</td>
<td>Already established / worked area</td>
<td>Yes</td>
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<td>10</td>
<td>Willingness to demonstrate multiple mining processing methods</td>
<td>Yes</td>
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<td>11</td>
<td>Willingness to have exploration / prospecting &amp; mineral characterization – commercially viable deposits</td>
<td>Yes</td>
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Justification for Selection Site

Karrau village requested to be a site for the demonstrations in responsible mining during the workshops held in preparation of the Village Sustainable Development Plan. The key criteria which supported the selection of Karrau as an appropriate location were:

- Karrau has served as an entry point for several mining operations in the Cuyuni/Mazaruni mining districts for many years.
- Many villagers are engaged in mining as dredge owners, workers, and services suppliers.
- The village plan has areas zoned for mining and mine-related activities; additionally, there are several nearby mining operations existing on mining blocks adjacent to the Karrau Village.
- The location of Karrau is easily accessible to many miners from the mining town of Bartica and nearby indigenous and local communities e.g., River View, Itaballi, Agatash, Bydarabo, Kartabo, etc.
- Villagers possess the necessary skills to support the demonstrations.

Mining Protocols for the Preparation of the Karrau’s Demo site

CI Guyana has set up mining demonstration sites in Regions 7 and 8 and has developed best practices on how to do so successfully. Recommendations were also identified on how to improve the sites. These are all documented in a Mining Site Protocol document prepared under the planetGOLD project. This document will guide the process of setting up the site in Karrau and ensure that lessons learned from the past are implemented in the new site.
**planetGOLD Standards Mitigation Table for Karrau mining site**

<table>
<thead>
<tr>
<th>planetGOLD Focus</th>
<th>Relevancy to Karrau</th>
<th>Mitigation Actions</th>
<th>Responsibility</th>
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<tbody>
<tr>
<td>LEVEL 1</td>
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<tr>
<td>1. Management</td>
<td>Management is vested in the Karrau Village Council. There is expected to be a committee with responsibilities for managing the mine site and it is expected that a supervisor would be appointed for day-to-day management. The Toshao would need to give his signature on behalf of the VC on official documents and in this case the various &quot;policy tools&quot;.</td>
<td>Karrau is expected to make a written commitment to comply with the planetGOLD Criteria. See Annex for example.</td>
<td>CI- Guyana and Karrau Village Council</td>
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<tr>
<td>2. Legitimacy</td>
<td>The planned operations should be covered by the Mining Act and Regulations; operations must be in keeping with the Amerindian Act. Mining Operations permitted to work should be covered by an Agreement which addresses (among others): Tributes on production, resolution of disputes etc. The detail of the Act is well-known to the Council. The 2006 Amerindian Act makes provision from Sections 48 to 53 for dealing with mining in the Villages and provides safeguards for the villagers if they allow mining activities within the boundaries of their Titled Villages. Section 53 deals with some of the obligations of the Guyana Geology &amp; Mines Commission (GGMC) in providing additional safeguards for the Villages where mining is taking place and Part XIV of the Mining Act 1989 sets out special provisions to treat with mining in the Amerindian Villages and Communities.</td>
<td>CI-Guyana to confirm and verify the validity of the permits</td>
<td>CI-Guyana</td>
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<tr>
<td>3. Human Rights</td>
<td>The Labour Act is relevant here as well as the TIP Act. Trafficking in Persons in Guyana is governed by the Combating of Trafficking in Persons Act 2005. The Village should be mindful and vigilant of cross-border activities involving Brazilians and Venezuelans gaining access via the Cuyuni River that is relatively close to the Village, that is, the Cuyuni originates in Venezuela and flows into the Mazaruni of which Karrau is on the left bank.</td>
<td>Workers at demo site to have formal contracts specifying their rights and biodata. ▪ Accessibility to the CI grievance mechanism or a separate site grievance system. ▪ Karrau VC to enforce and CI- Guyana to verify.</td>
<td>▪ Karrau VC to enforce and CI- Guyana to verify.</td>
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<tr>
<td>and worker welfare</td>
<td>The Labour Act and the TIP Act are relevant here.</td>
<td>Accessibility to the CI grievance mechanism or a separate site grievance system.</td>
<td>CI Guyana to share and inform on the AGM</td>
</tr>
<tr>
<td>4. Torture, cruel, inhuman, and degrading treatment</td>
<td>The Labour Act and the TIP Act are relevant here.</td>
<td>Accessibility to the CI grievance mechanism or a separate site grievance system.</td>
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<td>5. Forced or compulsory labour</td>
<td>The Labour Act and the TIP Act are both relevant. Karrau is close to the centre of administration of ministries responsible for education, social services and policing. It would be difficult for persons to engage in forced labour and escape sanctions although such possibility must not be ignored.</td>
<td>▪ Register of workers (names, addresses, contact information and the national id numbers listed on the register or a</td>
<td>▪ Karrau VC to enforce and CI- Guyana to verify.</td>
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<td>6.</td>
<td>Child labour</td>
<td>The Mining Act and the Labour Act are both relevant here. It was often reported that the mining sector has facilitated some forms of child labour in Guyana as mining operations are based in the hinterland in areas which are economically depressed and with policing challenges. Karrau is not among these areas.</td>
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Register for workers at the demo site where workers’ IDs, age and address are recorded. |
| 7. | War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide | Historically, war crimes were not among the serious issues considered by Guyanese. However, Guyana is among the 142 States parties to the Convention to surrender persons accused of war crimes to the International Criminal Court (Art 98. 2003). |

Not applicable for the Karrau’s demo site |
| 8. | Direct or indirect support to non-state armed groups, or illegally acting regular forces (police, army etc.) | None of these phenomena are currently being reported in Guyana; however, Guyana is a signatory to the relevant international conventions which address these. |

Not applicable for the Karrau’s demo site |
| 9. | Bribery and fraudulent misrepresentation of the origin of minerals or of taxes, fees, and royalties paid to governments and money laundering | GRA Act, Mining Act, Regulations GRA Act and the Anti money Laundering Act are enforceable and should be highlighted. |

- Karrau should develop a procedure on how gold mined at the demo site is sold and profits distributed including accountability of all fees and royalties. Example
- Traceability system for the mercury-free gold from Karrau should be developed.
- Karrau VC with support from CI-Guyana to verify. |
| 10. | Labour rights | Labour Act and NIS Act adequately covers labour rights. The Labour Law in Guyana is regulated mainly by the Labour Act of 1942 (amended as of 1997). The Law governs the terms and conditions of employment such as working hours, holidays and rest periods, wages, overtime, and other employment conditions. Occupational Safety and |

Karrau should document the oral contracts including the number of working hours, documented with signatures. |
Health Department of the Ministry of Labour is mandated to investigate, report and in some cases prosecute for breaches of the Law.

11. **Discrimination and vulnerable groups**

The Convention to address discrimination was established by the Prevention of Discrimination Act of 1997. Various penalties and remedies are outlined in the Act.

- Karrau should take measures to raise awareness on women participation in small scale mining.
- An accessible grievance mechanism should be put in place for reporting potential cases of violence.

**LEVEL 2**

12. **Mercury**

The National Action Plan on Mercury offers the requisite guidelines for the use, reduction in use and elimination of Mercury in the Small and Medium Scale Mining sector of Guyana. Guyana is a signatory to the Minamata Convention (2016).

- Karrau should have a traceability system to trace the originality of the mercury free gold.
- Management of mercury containing tailings from any adjacent mercury reduction flowsheet (which will be shared as support material developed to meet the Guyanese requirements on management of mercury containing tailings).

13. **Environmental Responsibility**

EPA Act and GGMC Codes of Practice give guidance. Serious and dedicate considerations should be given to the management of topsoil and overburden removed for the purpose of rehabilitation; waste management in addressing hazardous wastes, solid wastes (including domestic wastes); surface water and ground water management; special interest should be given to tailings management. Since water would be a prime mover in the operations careful use not to pollute / contaminate the natural environment should be taken. The importance of maintaining Biodiversity should be recognized; although the project area has been exposed to much exploitation of its natural resources some attention should be given to this aspect. Progressive rehabilitation of mined areas with native species endemic to the site is recommended to maintain the genetic integrity of the vegetation of the site and improve habitat values.

Likely management objectives:
- Maintain Areas of Remnant Vegetation

- Karrau should develop an Environmental management plan including rehabilitation plan.
- Karrau can work with GGMC Environment to develop relevant mine management plan.

- Environmental checklist assessment and report should be conducted by GGMC.

- Karrau VC with support of GGMC
- GGMC and CI-Guyana to verify
<table>
<thead>
<tr>
<th>Level 3</th>
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<tr>
<td>14. Social responsibility</td>
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<td>15. Health and safety</td>
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</table>
4. Employees not wearing issued safety clothing and associated equipment in an area where the use of such in mandatory will be required to leave such designated areas and will be subjected to disciplinary measure.

5. Employees who abuse the safety equipment and protective clothing or fail to comply with instruction or requirements to wear such in designated areas shall be subject for disciplinary action.

6. Machinery/Equipment are to be operated only:
   a) By competent and authorized operators/personnel
   b) When safety gears are in position
   c) In a manner that does not endanger other employees or Company property
   d) When they are fully serviceable
   e) When due consideration for the safety of others in the vicinity

7. Smoking is not permitted anywhere inside or near the processing plant, power plant, fuel depot area or in any other designated non-smoking areas. The prohibition of drugs also established.

8. Issues: The Village will consider responsibility for the health and safety and well-being of all employees and will through a safety committee made up of workers, management, and employees’ representatives to meet the responsibility that includes:

9. First Aid Kits: First aid kits shall be provided on the mining site and camps at the expense of Operators.

10. Protective Clothing
    a) The Operator shall endeavour to provide masks, face shields, gloves, fireproof garments, welding shields, steel hard toe boots, ear covers, chain saw chaps / leggings and goggles as protective measures as is considered necessary. Employees required to work under the rain will be provided with wet weather gear.
    b) Overalls, safety helmets and one pair of safety boots shall be provided to employees as is considered necessary.
    c) When an employee requires replacement of safety boots due to unaccountable loss or misused thereof, it is agreed that the employee shall bear the cost of replacement. The cost of such boots will be recovered in instalment by deduction made from employee’s wages.

11. The management reserves the right to arrange to test any employee and the employee agrees to the following tests when necessary:
    a) Breath tests, blood tests or urine tests to determine if they are under the influence of alcohol or drugs.
    b) Eyesight and hearing if required to determine the employee suitability to drive or operate any vehicle or machinery/equipment safety.

12. Warning signs: Warning signs will be installed around areas that have potentials for danger, such as the fuel storage area and around shaft area.

<table>
<thead>
<tr>
<th>Corrective and Preventive Actions</th>
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<tbody>
<tr>
<td>▪ First Aid Kit as required by GGMC</td>
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<tr>
<td>▪ PPEs for workers (hardhats, visibility vests, gloves and googles)</td>
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<tr>
<td>▪ Warning signs put up in identified area for prevention of accidents</td>
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</table>
13. Employment: One of the main positive impacts of this project will be that of employment. This project will provide both direct and indirect employment for persons within Guyana; this includes persons from Indigenous and Local Communities. The project will also trigger a series of indirect employment via the multiplier effect as monies will be spent on equipment, food, transportation, vehicles and spares and other procured items.

14. Fire Safety: The Operator will ensure that safety drills are held at regular intervals for persons that work in the mine. These safety drills are intended to foster a culture of mine safety and will train mine workers to be prepared and take appropriate actions in an emergency including, where appropriate, the correct use, handling, or operation of emergency equipment; and, to train and check skills of such persons to whom specific duties involving the use, handling or operation of such equipment will be assigned in the event of an emergency.

The Operator will ensure that no person at work at the mine uses a naked flame or carries out any work which could give rise to a risk of unintended explosion or fire unless sufficient measures to prevent such an explosion or fire are taken. No person will smoke in any part of the mine, particularly underground (in the cases of tunnel or shaft to reach gold bearing rocks) where there is a risk of fire or explosion. Appropriate signage would be posted to inform workers on the restrictions and areas of influence. Hot work will not be permitted near closed vessels which contain, or have contained, flammable substances including lubricating oil, grease, and diesel and hydraulic fuel. Hot work will also be prohibited on close pressurized systems, which could explode or fail because of heat.

While appropriate fire protection equipment is vital, it is rendered useless if not in proper working order. Fire protection equipment would be regularly inspected and replaced or repaired as necessary. Other equipment, such as hoses, pipes, and machinery, would also be cleaned regularly as build-up of dust and dirt can increase the risk of malfunction. Sand buckets placed strategically are very useful.

15. Vector Control
The camp, mine services and administration area should be fogged periodically (weekly/monthly/quarterly) to control mosquitoes and other insects. All workers should be issued Long Lasting Insecticide Nets (LLINs) to reduce insect population in the accommodation areas.

The following additional steps will be taken to control the vector population around the camp areas:

a) All water storage containers at the camp site will be covered.

b) All garbage will be burned or buried.

c) Workers will be instructed to use insect repellents and use the mosquito nets when sleeping.
d) Workers will be instructed to wear light coloured clothing and long-sleeved clothing where possible; and
e) The campgrounds will be kept clean to destroy any breeding grounds for mosquitoes.

The following rules and procedures had been developed to enhance and maintain a safe working environment to minimize the frequency and severity of accidents. A Worksite Safety Committee should be formed to include the general manager and other supervisors. The safety measures promoted as follows:

i. Appropriate safety equipment/materials or protective clothing will be provided for certain categories of workers as recommended by the Safety Committee / Management

ii. Workers are required to wear safety equipment or protective clothing provided by the Management in designated areas as and when directed by the Management.

iii. Employees will be expected to take care of items of safety equipment and protective clothing issued to them.

iv. Employees not wearing issued safety clothing and associated equipment in an area where the use of such in mandatory will be required to leave such designated areas and will be subjected to appropriate disciplinary measures.

v. Employees who abuse the safety equipment and protective clothing or fail to comply with instruction or requirements to wear such in designated areas shall be subject for disciplinary action.

vi. Machinery/Equipment are to be operated only:
   a. By competent and authorized operators/personnel
   b. When safety gears are in position
   c. In a manner that does not endanger other employees or Company property
   d. When they are fully serviceable
   e. When due consideration for the safety of others in the vicinity.

vii. Smoking is not permitted anywhere inside or near the power plant/generating set, fuel depot area or in any other designated non-smoking areas.

viii. First Aid Kits: First aid kits shall be provided on the mining site and any temporary camps.

ix. Protective Clothing
   a) The Operator / management shall endeavor to provide masks, face shields, gloves, fireproof garments, welding shields, steel hard toe boots, ear covers, chain saw chaps/leggings and goggles as protective measures as is considered necessary. Employees required to work under the rain will be provided with rain/wet-weather gear.
   b) Overalls, safety helmets and one pair of safety boots shall be provided to employees as is considered necessary.
   c) When an employee requires replacement of safety boots due to unaccountable loss or misused thereof, it is agreed that the employee shall bear the cost of
replacement. The cost of such boots will be recovered in instalment by deduction made from employee’s wages.

x. The Operator reserves the right to arrange to test any employee and the employee agrees to the following tests when necessary:
   a) Breathalyzer tests, blood tests or urine tests to determine if they are under the influence of alcohol or drugs.
   b) Tests for visual or hearing impairment if required to determine the employee’s suitability to operate any plant or equipment safety.

xi. Warning signs: Warning signs will be installed around areas that have potentials for danger, such as the fuel storage area and around stockpiles or shaft area and areas of unstable ground conditions. This information will be useful in demarcating exits during an emergency.

xii. Risk Identification
   To assist in identifying fire risks, a fire survey would be conducted regularly to identify the various fuel and ignition sources present at each location. This information may then be used as a basis for the assessment and control of fire risk. On-going risk identification would be done to supplement the fire survey. Other hazard identification systems include:
   a) Employee hazard identification and reporting procedures.
   b) Worksite inspections.
   c) Monitoring of the working environment.
   d) Incident investigations.
   e) Monitoring original equipment manufacturer (OEM) bulletins, recommendations, and specifications.
   f) To assist in the identification of fire risks, all workers would be provided with training in basic fire theory and how to identify potential fire scenarios in the underground environment.

xiii. Fire Safety
   a) The Operator will ensure that safety drills are held at regular intervals for persons that work in the mine. These safety drills are intended to foster a culture of mine safety and will train mine workers to be prepared and take appropriate actions in an emergency including, where appropriate, the correct use, handling, or operation of emergency equipment; and, to train and check skills of such persons to whom specific duties involving the use, handling or operation of such equipment will be assigned in the event of an emergency.
   b) The Operator will ensure that no person at work at the mine uses a naked flame or carries out any work which could give rise to a risk of unintended explosion or fire unless sufficient measures to prevent such an explosion or fire are taken. No person will smoke in any part of the mine, particularly underground in an excavation where there is a risk of fire or explosion. Appropriate signage would be posted to inform workers on the restrictions and areas of influence. Hot work will
not be permitted near closed vessels which contain, or have contained, flammable substances including lubricating oil, grease, and diesel and hydraulic fuel. Hot work will also be prohibited on close pressurized systems, which could explode or fail because of heat.

c) The installation of fire protection equipment would include fire sprinkler systems for the operation (where appropriate), water mist systems, foam systems, breathing apparatus, gas detection units and portable fire equipment. Access is a critical consideration when installing fire protection equipment. Staff awareness and alertness will be promoted as it is important, they can access equipment quickly and easily.

d) While appropriate fire protection equipment is vital, it is rendered useless if not in proper working order. Fire protection equipment would be regularly inspected and replaced or repaired as necessary. Other equipment, such as hoses, pipes, and machinery, would also be cleaned regularly as build-up of dust and dirt can increase the risk of malfunction.

xiv. Vector Control
The camp will be fogged periodically, to control mosquitoes and other insects. All workers will be issued Long Lasting Insecticide Nets (LLINs) to reduce insect population in the accommodation areas.

The following additional steps will be taken to control the vector population around the camp areas:

a. All water storage containers at the camp site will be covered.
b. All garbage will be burned or buried.
c. Workers will be instructed to use insect repellents and use the mosquito nets when sleeping.
d. Workers will be encouraged to wear light colored clothing and long-sleeved clothing where possible; and,
e. The campgrounds will be kept clean to destroy any breeding grounds for mosquitoes.
Risk Mitigation Assessment

The demo mining site in Karrau needs periodic monitoring and reporting of progress and adherence to the planetGOLD criteria. To facilitate this, the Table below can be used.

<table>
<thead>
<tr>
<th>No.</th>
<th>planetGold focus</th>
<th>Number of Issues/Non-compliance</th>
<th>Findings</th>
<th>Recommended Actions</th>
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<tbody>
<tr>
<td>LEVEL 1</td>
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<tr>
<td>1.</td>
<td>Management</td>
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<tr>
<td>2.</td>
<td>Legitimacy</td>
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<tr>
<td>3.</td>
<td>Human Rights and worker welfare</td>
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<td>4.</td>
<td>Torture, cruel, inhuman and degrading treatment</td>
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<td>5.</td>
<td>Forced or compulsory labour</td>
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<td>6.</td>
<td>Child Labour</td>
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<td>7.</td>
<td>Bribery and fraudulent misrepresentation of the origin of minerals or of taxes, fees, and royalties paid to governments and money laundering</td>
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<td>8.</td>
<td>Labour rights</td>
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<td>9.</td>
<td>Discrimination and violence against vulnerable groups</td>
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<td>LEVEL 2</td>
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<td>10.</td>
<td>Mercury</td>
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<tr>
<td>11.</td>
<td>Environmental Responsibility</td>
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<td>12.</td>
<td>Social Responsibility</td>
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<td>LEVEL 3</td>
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<td>13.</td>
<td>Health and Safety</td>
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Annex A

Regulatory Framework a look at the key laws for Small and Medium Scale Mining

General


1. The Environmental Protection Act 1996

The implementation of the project must be guided by the Environmental Protection Act 1996. The Environmental Protection Act established the Environmental Protection Agency and provided for the management, conservation, protection, and improvement of the environment. The act has provisions for the prevention or control of pollution, the assessment of the impact of economic development on the environment and the sustainable use of natural resources. The Act mandates the performance of Environmental Impact Assessments for projects with significant impacts on the environment. This Act was amended in 2005 and includes a section on record keeping and monitoring requirements. Under this section, the Environmental Protection Agency requires that any person who releases or engages in the handling of hazardous substances or contaminants to:

i. Sample and analyze such contaminant or hazardous substances, or material, contaminated by same for specific constituents or characteristics.

ii. Install, use, and maintain such monitoring equipment, and implement such environmental audit procedures as may be specified in any environmental authorization issued pursuant to this Act.

iii. Establish and maintain records regarding such sampling, monitoring, and environmental auditing activities.

iv. Establish and maintain records regarding pollution control equipment on the premises (Including records on control equipment parameters, production variables and other indirect data when direct monitoring is not required).

v. Submit reports including compliance reports; and

vi. Provide such other information as the authority may require.

There are five (5) pieces of legislations governing environmental protection which were enacted in 2000 under the Environmental Protection Act. These are:

a) The Environmental Protection Air Quality Regulations

b) The Environmental Protection Water Quality Regulations

c) The Environmental Protection Noise Management Regulations

d) The Environmental Protection Hazardous Wastes Management Regulations

e) The Environmental Protection Authorizations Regulations

2. Mining Act, 1989

The Guyana Geology and Mines Commission (GGMC) is responsible for the implementation of the Mining Act 1989, which establishes the legal framework for the utilization of mineral resources in Guyana. The Act makes provision for a system of mineral agreements and licenses for regulating prospecting. It gives the Commission the responsibility for establishing regulations for mining and quarrying operations.
A mining licence is required to mine any mineral and is issued at the discretion of the Commissioner of Guyana Geology and Mines with the Minister responsible for mining. The rights of persons in possession of lands grants as well as the privileges of Amerindians in relation to prospecting, mining, quarrying are preserved under this Act. Further regulatory framework under the Act makes provisions for the disposal of sanitary waste and the storage of poisonous substances in mining areas. The Act also provides for the granting, prospecting, mining licenses and quarrying permits by the Guyana Geology and Mines Commission (GGMC) and for the conduct of geological and geophysical surveys in any part of Guyana including forested land held under leases, TSAs and other permits issued by the GFC.

3. Mining Regulations

Environmental Regulations under the Mining Act are currently being developed for the mining sector. These regulations will require a licence for the use of poisonous substances such as mercury and cyanide and will promote the enforcement of environmental standards in the sector for small and medium scale mining. In general, the regulations establish regulatory control in areas of key environmental concerns, some of which will be applicable to the activities of this project. These include:

- Management of mining waste.
- Water quality.
- Closure and reclamation.
- Management of the natural environment for exploration and mining.
- Submission of environmental management plans in accordance with an environmental code of practice established by the Guyana Geology and Mines Commission.
- Contingency and Response Plans.

4. Guyana Geology and Mines Commission

GGMC is the regulatory institution which will have direct oversight of the project. The overall role and function of the organization is:

- To act as a development change agent in the diversification of the economic base of Guyana through its activities in the mineral sector.
- To create the opportunities for rapid economic development which an expanding mineral sector is ideally suited to provide.
- To act as a national repository for all information relating to geology and mineral resources which will facilitate an understanding of the resource base of the country.
- To provide to the public the basic prospecting information and advisory services, on the available economic mineral prospects.
- To provide advice to the government on appropriate mineral policy matters so that Guyana’s mineral resources can be rationally developed and utilized.
- To regulate on behalf of the government all activities in the mineral sector.
- Promotion of mineral development.
- Provision of technical assistance and advice in mining, mineral processing, mineral utilization, and marketing of mineral resources.
- Research in exploration, mining, and utilization of minerals and mineral products.
- Enforcement of the conditions of Mining Licenses, Mining Permits, Mining Concessions, Prospecting Licenses (for Large Scale Operations), Prospecting Permits (for Medium and Small-Scale operations) and Quarry Licenses.
- Collection of rentals, fees, charges, levies etc. payable under the Mining Act.
5. **Occupational Safety and Health Act 1997**

The identification of the health and safety hazards during the operation of the proposed development must be seen as a key element for assessment. The Occupational Safety and Health Act 1997 outlines the procedures for establishing a factory site, regulating its and mandates that health and safety facilities are provided, maintained and the industrial establishment complies with the regulations under the Act. In keeping with the laws and regulations a description of the established management procedures to monitor and manage occupational health and safety hazards is important for this project. In addition to the regulatory and legislative requirements above, self-regulation by the company would also provide added assurance that environmental impacts are assessed consistently for all the project activities. Self-regulation would be achieved through Best Available Technology Economically Available (BATAE)
Annex B
1. Responsible Supply Chain

Karrau Mine

Our commitment

Recognizing the risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas and recognizing that we have the responsibility to respect human rights and not contribute to conflict. We commit to refraining from any action which contributes to the financing of conflict, and we commit to comply with relevant guidelines in implementing resolutions.

Our position in the supply chain

Guidance such as the planetGOLD Criteria requires compliance with OECD DDG for Responsible supply chains. Our aim is to have no linkages with gold from conflicted supply chains.

Our supply chain policy

Regarding serious abuses associated with the extraction, transport or trade of minerals

1. While Guyana is close to conflict-affected and high-risk area, Venezuela, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
   a. any forms of torture, cruel, inhuman and degrading treatment;
   b. any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
   c. the worst forms of child labour as defined by ILO Convention No. 182 on the Worst Forms of Child Labour (1999);
   d. other gross human rights violations and abuses such as widespread sexual violence;
   e. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses

2. We will immediately suspend or discontinue engagement with members or entities from, or linked to, any party committing serious abuses. This means ensuring that we properly examine and manage all members and entities we work with.

Regarding direct or indirect support to non-state armed groups

3. We will not tolerate any “Direct or indirect support” to non-state armed groups who:
   i. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
   ii. illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
   iii. illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups

4. We will immediately suspend or discontinue engagement with members or entities linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3. In practice this means ensuring that we properly vet and manage all members and entities.

Regarding public or private security forces

5. We agree to monitor, potential linkages with direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points
where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. We will take steps, to adopt screening to ensure that individuals or entities that are known to have been responsible for gross human rights abuses will not be hired in our organisation.

7. We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability could be improved.

8. We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, women to adverse impacts.

Regarding risk management of public or private security forces

9. In accordance with our various positions in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with members or entities after failed attempts at mitigation within six months from the adoption of the risk management plan.

Regarding bribery and fraudulent misrepresentation of the origin of minerals

10. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Regarding money laundering

11. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments

12. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company’s position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments

13. In accordance with our various positions in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Regarding health and safety matters

14. We recognise that normal practice in most artisanal mine sites pay little regard to good health and safety practice. As part of our collaboration with cooperatives, we will ensure that over time, miners are able to work in a safe and secure environment. This will include, *inter alia*: having access to personal protective equipment and be trained in the correct use of such; time management systems
to limit excessive hours of work; and use of proper interlocking guards and other safety mechanisms on machinery.

15. In particular, and as a priority, we will ensure that the use of mercury in the production of gold is eliminated from operating processes as soon as possible at all mine sites where we operate.

How this policy will be used and implemented

Operating practices
This policy is necessarily framed reasonably broadly as it needs to cover a range of eventualities. The broad policy statements will be implemented through the introduction of clear operational processes, plans, and standard operating procedures.

Continuous improvement
There will, in most cases, be a significant gap between existing practice at a mine site and the standards set out in this document. Therefore, we are committed to a process of continuous improvement over time.

Name:

Title: Mine Owner/ Manager
Signature:

Date:

Next Review Date:
2. Environmental and Social Responsibility Policy

Karrau mine commits to:
- Environmental and biodiversity protection
- Protection of the rights of the indigenous people
- Aligning with the conservation goals of the area where mining operations are located.

Karrau mine will achieve the above through:
- Complying with environmental and social responsibility regulations.
- Responsible management of mine waste and use of mercury-free technology.
- Consulting and engaging the indigenous people on mining activities that have adverse impacts on their communities.
- Taking action towards mitigating the adverse effects of mining activities among indigenous people.
- Protection of biodiversity and rehabilitation of the mined land.
- Monitoring water quality and using water resources and water bodies in coordination with other water users.

Name:

Title: Mine Owner/ Manager

Signature:

Date:

Next Review Date:
3. Written Commitment to conform with the planetGOLD Criteria

I, _________________________, commit to conforming to the planetGOLD Criteria by complying with the requirements on:

- The CRAFT Code
- Elimination of mercury use
- Environmental Responsibility
- Socially Responsible
- Other relevant risks

Name:

Title: Mine Owner/ Manager

Signature:

Date: