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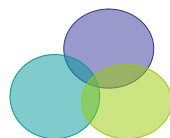


INITIAL CONSULTATION REPORT ON

THE DEVELOPMENT OF SOCIAL RESPONSIBILITY GUIDELINES FOR MINING COMPANIES IN MINING COMMUNITIES

Submitted to:

The Chief Executive Officer
Minerals Commission
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Social Responsibility, Resettlement &
Community Development

EXECUTIVE SUMMARY

This Consultation Report is one of the first deliverables in the *Development of Social Responsibility Guidelines for Mining Companies in Mining Communities*. The study is a critical part of the Natural Resources and Environmental Governance (NREG) Programme, which also include the Forestry sub-sectors. Under the NREG Programme, Government of Ghana (GOG) has received assistance through Sector Budget Support (SBS) from the World Bank, the Royal Netherlands Government, United Kingdom Department of International Development (DIFID), Agence Française de Développement and the European Commission (EC) to implement a programme with an overall objective of assisting the improvement of Natural Resource and Environmental Governance in Ghana.

Corporate social responsibility (CSR) has become one of the most important issues facing the exploration and mining industry all over the world. CSR has been defined by the World Business Council for Sustainable Development as “the continuing commitment by business to behave ethically and contribute to economic development while improving the quality of life of the workforce and their families as well as of the local community and society at large.” For an individual company, this means the integration of social (including human rights), environmental and economic concerns into that company’s values and culture.

In Ghana today there are no best practice management systems for applying CSR nor are there nationally recognized CSR standards against which a company can benchmark its efforts in this regard. It is increasingly accepted that in order to define precisely what social responsibility means to a company, it needs to engage with its stakeholders and take into account their needs and aspirations when designing CSR strategies and programmes. It is therefore vital to understand the priorities of local stakeholders and take them into account.

The purpose of stakeholder consultation is to ensure that community members and other interested parties are provided with clear information about the Guidelines and are given the opportunity to express their views and concerns, and make suggestions on the Guidelines. The objective of the consultation process is to:

- Identify key stakeholders whose involvement must be proactively ensured;
- Ensure that stakeholders are aware of the proposed project and process;
- Provide stakeholders with the opportunity to contribute and promote their continued involvement; and
- To obtain their initial issues of concern and suggestions for enhanced benefits;

The following multi-pronged approach was adopted to obtain issues and suggestions from the spectrum of stakeholders:

- Stakeholder identification;
- Focus-group discussions;
- One-on-one key informant interviews;
- Public meetings (pending); and
- Stakeholder workshop (pending).

Comments and suggestions have been reviewed and organized by subject matter. All responses are therefore subject-matter based rather than specific to each comment received to avoid duplication and with the intent of providing concise and accurate responses to the extent practicable.

The views and comments have been categorized in Appendix I of this report according to the following topic areas:

- Need and desirability of the proposed guidelines CSR
- Peoples' understanding of CSR
- Social infrastructure and services
- Health and safety issues
- Socio-economic issues
- Alternative livelihood programmes
- Company - community relations
- Decision making /consultation/ participation
- Expectations
- Key problem areas
- Suggestions for community development projects.
- Suggestions for CSR Guidelines

Issues and suggestions made during the stakeholder engagement process include the following:

- Lack of transparency in the disbursement of CSR funds
- Micro-credit programme for women
- All mining companies should initiate needs assessment and impact assessment for their CSR programmes.
- All mining communities should have copies of the Guidelines so as to monitor and report deviations to the appropriate authorities.
- Socio-economic surveys need to be undertaken by all mining companies in mining communities in order to establish the 'status quo' of the people.
- Periodic conduct of SES, at 5-year interval to serve as a yardstick for assessment.
- Mining companies should engage in meaningful consultation with the communities before CSR project are implemented
- Mining companies should desist from reporting mitigation projects undertaken in impacted communities as part of their CSR projects.
- District Assemblies should be responsible for monitoring the operations of CSR activities
- Guidelines should be enforceable – degraded lands should be reclaimed.
- The CSR projects of mining companies should be integrated into the District/Municipal Assembly's medium-term plans
- Rating system of companies by authorities to force them into action.
- CSR Guidelines should be incorporated into the Mining and Minerals Law of Ghana.
- The government should provide some kind of incentive to companies that are doing well in terms of CSR. For example, tax incentives and award schemes of some sort will encourage all companies to be more serious with CSR.

LIST OF ABBREVIATIONS/ACRONYMS

CSI	Corporate Social Investment
CSR	Corporate social responsibility
CHRAJ	Commission on Human Rights and Administrative Justice
DA	District Assembly
DCD	District Coordinating Director
DCE	District Chief Executive
DIFID	United Kingdom Department of International Development
EC	European Commission
EITI	Extractive Industries Transparency Initiative
EPA	Environmental Protection Agency
EPFIs	Equator Principles Financial Institutions
GEITI	Ghana Extractive Industries Transparency Initiative
GRI	Global Reporting Initiative
GOG	Government of Ghana
IFC	International Finance Corporation
IIED	International Institute for Environment and Development
IRS	Internal Revenue Service
MC	Minerals Commission
MDAs	Municipal and District Assemblies
MLFM	Ministry of Lands, Forestry and Mines
MMSD	Mining, Minerals and Sustainable Development
MOFEP	Ministry of Finance and Economic Planning
NGO	Non Governmental Organisation
NREG	Natural Resources and Environmental Governance
OASL	Office of the Administrator of Stool Lands
RAP	Resettlement Action Plan
SBS	Sector Budget Support
TOR	Terms of reference
TWN	Third World Network
UG	University of Ghana
WACAM	Wassa Association of Communities Affected by Mining

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1.0 INTRODUCTION

This Consultation Report is one of the first deliverables in the *Development of Social Responsibility Guidelines for Mining Companies in Mining Communities*. The study is a critical part of the Natural Resources and Environmental Governance (NREG) Programme, which also include the Forestry sub-sectors. Under the NREG Programme, Government of Ghana (GOG) has received assistance through Sector Budget Support (SBS) from the World Bank, the Royal Netherlands Government, United Kingdom Department of International Development (DIFID), Agence Française de Développement and the European Commission (EC) to implement a programme with an overall objective of assisting the improvement of Natural Resource and Environmental Governance in Ghana.

Corporate social responsibility (CSR) has become one of the most important issues facing the exploration and mining industry all over the world. CSR has been defined by the World Business Council for Sustainable Development as “the continuing commitment by business to behave ethically and contribute to economic development while improving the quality of life of the workforce and their families as well as of the local community and society at large.” For an individual company, this means the integration of social (including human rights), environmental and economic concerns into that company’s values and culture.

A large part of competing and working in a globalized world rests on the reputation of companies, which is based partly on the quality of their products and partly on the activities of those companies outside of production. Being involved with communities and working with the people of host communities can serve to enhance a company’s reputation and to facilitate future acquisitions. This is especially important for the mining industry, which has a reputation as being the cause of serious environmental damage. Furthermore, mines are often located in remote areas where they are the only significant economic activity. The reputation of companies, based on their actions in other areas, is reflected in the idea of the social license to operate.

Corporate social responsibility (CSR) differs from place to place, industry to industry and over time. Mining companies in Ghana, as is the case worldwide, have been placed under increasing pressure by stakeholders to perform business activities in a more socially responsible manner. They are specifically required by the Minerals Commission, EPA as well as the Minerals and Mining Law 2006 (Act 706) to adopt good environmental practices. In addition mining companies voluntarily provide at immense cost, schools, clinics, roads, water, electricity and housing for their communities. This is in addition to statutory payments such as royalties and other taxes.

In Ghana for example, there are no best practice management systems for applying CSR nor are there nationally recognized CSR standards against which a company can benchmark its efforts in this regard. It is increasingly accepted that in order to define precisely what social responsibility means to a company, it needs to engage with its stakeholders and take into account their needs and aspirations when designing CSR strategies and programmes. It is therefore vital to understand the priorities of local stakeholders and take them into account.

1.2 Report outline

Following this introductory section, the remainder of the report is organised as follows:

Section 2:	Stakeholders
Section 3:	Purpose of stakeholder consultation
Section 4:	Approach
Section 5:	Study sites
Section 6:	Stakeholder groups consulted
Section 7:	Comments and observations
Section 8:	Public consultation and matters arising
Section 9:	Conclusion
Appendix I:	Issues and Suggestions matrix
Appendix II:	List of stakeholders engaged

2.0 STAKEHOLDERS

Stakeholders are those individuals, groups, communities, organizations, associations or authorities whose interests may be positively or negatively affected by a proposal or activity and/or who are concerned with a proposal or activity and its consequences. The term therefore includes the proponent, authorities and all interested and affected parties (I&APs)¹. Public participation provides the mining company, the authorities and other stakeholders with an up-front indication of issues which may result in enhanced and shared benefits, especially where stakeholders are able to make suggestions for mutual benefit and where they are able to discuss their differences directly, often leading to creative new solutions.

3.0 PURPOSE OF STAKEHOLDER CONSULTATION

The purpose of stakeholder consultation is to ensure that community members and other interested parties are provided with clear information about the Guidelines and are given the opportunity to express their views and concerns, and make suggestions on the Guidelines. The objective of the consultation process is to:

- Identify key stakeholders whose involvement must be proactively ensured;
- Ensure that stakeholders are aware of the proposed project and process;
- Provide stakeholders with the opportunity to contribute and promote their continued involvement; and
- To obtain their initial issues of concern and suggestions for enhanced benefits;

4.0 APPROACH

The following multi-pronged approach was adopted to obtain issues and suggestions from the spectrum of stakeholders:

- Stakeholder identification;
- Focus-group discussions;
- One-on-one key informant interviews;
- Public meetings (pending); and
- Stakeholder workshop (pending).

¹ Department of Environmental Affairs and Tourism (DEAT), 2002. Stakeholder Engagement, Integrated Environmental Management Information Series 3, Department of Environmental Affairs and Tourism, Pretoria

5.0 STUDY SITES

Sites were selected to include a range of attributes, such as mine type, commodity, geographic location, size, location in relation to human populations, and environmental and social issues. The key locations (areas) of focus are indicated in Table 1.

Table 1: Key locations (areas) of focus.

REGION	MINING COMPANY	MINERAL MINED	DISTRICT/MUNICIPAL ASSEMBLY	PROPOSED COMMUNITIES	REMARKS
WESTERN	GOLDEN STAR RESOURCES LTD., BOGOSU/PRESTEA	GOLD	PRESTEA-HUNI VALLEY	DUMASE, HIMAN,	LARGE SCALE MINE; FORMERLY UNDER THE WASSA WEST DISTRICT
	ANGLOGOLD ASHANTI (IDUAPRIEM)	GOLD	WASSA WEST	TEBEREBIE	LARGE SCALE MINE; INCLUDES TEBEREBIE OPERATIONS
	GOLD FIELDS GHANA LTD. (TARKWA)	GOLD	WASSA WEST	NEW ATUABO	LARGE SCALE MINE; PREVIOUS CYANIDE SPILLAGE PROBLEMS; RESETTLEMENT ISSUES; RETRENCHED MINERS
	GOLD FIELDS GHANA LTD (DAMANG)	GOLD	WASSA WEST	DAMANG	LARGE SCALE MINE; SOCIAL CONFLICTS; SUSTAINABLE LIVELIHOOD PROJECTS; CO-EXISTING WITH GALAMSEY; FUTURE UNDERGROUND MINE.
	CHIRANO GOLD COMPANY LIMITED	GOLD	SEFWI WIAWSO	AKOTI, ETWEBO, PABOASE	MINE PIT IN TANO SURAW & SURAW EXTENSION FOREST RESERVE
	GHANA BAUXITE COMPANY	BAUXITE	BIBIANI-ANHWIASO-BEKWAI	AWASO	SOLE OPTION
	GHANA MANGANESE	MANGANESE	WASSA WEST	NSUTA	SOLE OPTION
	CENTRAL AFRICAN GOLD	GOLD	BIBIANI-ANHWIASO-BEKWAI	BIBIANI, ABOABO	LARGE SCALE SURFACE MINE; SOCIAL CONFLICTS; GALAMSEY MINERS
EASTERN	NEWMONT GOLD GHANA LIMITED	GOLD	BIRIM NORTH	ADAWSENA	PERMIT HAS RECENTLY BEEN ISSUED TO OPERATE

					LARGE SCALE SURFACE MINING; VIRGIN AREA;
	GHANA CONSOLIDATED DIAMOND	DIAMOND	KWAEBIBIREM	AKWETIA AND BUADUA	SOLE OPTION; DISTRESSED MINE SLATED FOR DIVESTITURE.
BRONG AHAFO	NEWMONT GOLD GHANA LIMITED	GOLD	ASUTIFI	GYEDU, KENYASE	LARGE SCALE MINE; INNOVATIVE APPROACHES; VIRGIN AREA; PROXIMITY TO BOSUMKESE FOREST RESERVE; RESETTLEMENT ISSUES
ASHANTI	ANGLOGOLD ASHANTI	GOLD	OBUASI	DOKYIWA, SANSU	LARGE SCALE OLD UNDERGROUND MINE; BIOX PLANT; COMPLEX SOCIAL, HEALTH AND BIOPHYSICAL ISSUES; RESETTLEMENT OF DOKYIWA UNDERWAY
GREATER ACCRA	SONGOR TASK FORCE	SALT	DANGME EAST	ADA-SONGOR, ADJIMANI KOPE	MODERN OPERATION SIDE BY SIDE WITH TRADITIONAL MINING BY INDIGENES; BIG SOCIAL CONFLICTS; EASTERN CORRIDOR
	PAMBROS	SALT	GA WEST	MENDESKROM	PROXIMITY TO DENSU DELTA RAMSAR SITE
	EASTERN QUARRIES	STONES	DANGME WEST	SHAI HILLS	CLOSE TO SHAI HILLS GAME RESERVE; PROXIMITY TO SETTLEMENTS; GEOLOGICAL CHALLENGES
UPPER EAST	OBUASI MINING GROUP (TONGO)	GOLD	TALENSI- NABDAM	TONGO	BLASTING PROBLEMS; SAFETY ISSUES; UNDERGROUND MINING, HARD ROCK (>75M DEEP)

6.0 STAKEHOLDER GROUPS CONSULTED

Stakeholder groups consulted include:

- Mining communities;
- District and Municipal Assemblies;
- Traditional Authorities;
- Mining companies;
- Mining sector institutions; and
- NGOs and Civil Society Organizations.

7.0 COMMENTS AND OBSERVATIONS

As a result of the limited time frame no public meetings/hearing took place during the inception phase of the project, especially considering the fact that the research communities requested to be given advance notice before such meetings are held. The public meetings and stakeholder workshops will be done during the next phase of the study.

8.0 PUBLIC CONSULTATION AND MATTERS ARISING

A number of public engagement mechanisms were implemented during the preparation of this report. A summary of key consultation and participation activities are summarized in the following sections, whilst some details are provided in matrix format in *Appendix I*.

8.1 Community Members

Some of the issues and suggestions put forth by various groups during focus group discussions are presented below:

8.1.1 The Youth

The youth were engaged in focus group discussions in all the mining sites visited. They would especially like the Guidelines to:



Photograph 1: Focus Group Discussion with Youth of Kenyase II (left) & Dumasi (right)

- Cater for the provision of local employment, health facility, and the maintenance of existing economic activities of the people;
- Specifically serve the interests of directly affected persons – those whose lands have been taken by mining;
- Prescribe to mining companies to set up youth training centre, where skills in mining related programmes are taught; and
- Ensure that all vacancies are advertised; companies should not only advertise highly skilled or specialised job openings.

8.1.2 Farmers

Farmers are particularly interested in:

- The provision of farm inputs and agrochemicals to farmers by mining companies on credit;
- The involvement of community members in decisions regarding CSR projects;
- Adequate crop compensation rates for farmers;
- Alternative lands for farming activities; and
- CSR programmes should also include agricultural projects.

8.1.3 Women groups

Women groups consulted include petty traders (e.g. Women in Small Business Association – WISBA, Kenyasi No.2), hairdressers and small-scale producers.



Photograph 2: Focus Group Discussion with Women of Kenyase II (left) & Bibiani (right)

Most of the women consulted particularly called for:

- Transparency in the disbursement of CSR funds;
- Involvement of women in deciding CSR projects to be implemented for the community;
- The award of contracts to outsiders to stop;
- The protection of water bodies;
- Employment opportunities for women; women are often left out of job placement opportunities; they can do most of the unskilled jobs; and
- Micro-credit programme for women.

8.1.4 Traditional Authorities

Chiefs and elders of all the mining sites visited were consulted and their views and suggestions on the CSR Guidelines sought.



Photograph 3: Consultation with Traditional Authorities at Kenyase I (left) & New Atuabo (right)

Some of the suggestions made by Traditional Authorities include the following:

- A percentage of every ounce of precious mineral produced should be set aside and put into educational fund for wards of community members;
- There is the need to set up committees to be responsible for implementation of CSR;
- There is the need for the establishment of a development fund and the source and amount to be posted annually made known to the people;
- Mining companies should establish training centre and scholarship schemes in relation to mining to train local people to be absorbed;
- All mining companies should initiate needs assessment and impact assessment for their CSR programmes;
- The companies should choose their own contractors for their CSR projects; and
- There is the need for employment quota for local youth.

8.1.5 Unit Committee Members

Assemblymen and Unit Committee Members were also consulted.



Photograph 4: Consultation with Unit Committee Members of Sansu (left) & Tarkwa Bansa (right)

Views expressed include the following:

- The mining company should help improve the vital facilities in the community e.g. water, schools, toilet facilities etc;
- All mining communities should have copies of the Guidelines so as to monitor and report deviations to the appropriate authorities;
- Socio-economic surveys need to be undertaken by all mining companies in mining communities in order to establish the ‘status quo’ of the people and the project area;
- Periodic conduct of SES, at 5-year interval to serve as a yardstick for assessment;
- Mining companies should do thorough consultation with the communities before CSR projects are implemented;
- Mining companies should desist from reporting mitigation projects undertaken in impacted communities as part of their CSR projects; and
- There is the need for constant feedback from mining companies.

8.2 District and Municipal Assemblies

District Chief Executives (DCEs), District Coordinating Directors (DCDs), and Planning Officers of various District and Municipal Assemblies were consulted.



Photograph 5: Discussion with the District Assemblies of Kwaebibirim (left) & Tarkwa-Nsuaem (right)

Discussions centred on the following:

- District Assemblies should be responsible for monitoring the operations of CSR activities;
- Prior to CSR projects, there is the need for agreement to be signed between the chiefs/community, the mine and the District Assembly;
- CSR should be regulated by the government. When left to the community, non-affected land owners rather benefit. Any action taken by the mining companies should be based on knowledge of the level of devastation;
- The government must provide a level platform for negotiations by providing resourceful persons to assist farmers so as to arrive at better options;
- Guidelines should be enforceable;
- Degraded lands should be reclaimed;

- The CSR projects of mining companies should be integrated into the District/Municipal Assembly's medium-term plans; and
- Laws on CSR must address likely impact on communities that lie outside the concession but are likely to have the impacts – especially those living downstream of operational areas.

8.3 *Mining companies*

Ten (10) mining companies have been consulted during this initial consultation process.



Photograph 6: Consultation with Production Manager, GCD

Comments and suggestions made by the mining companies include the following:

- The government ought to live up to its social responsibilities in mining communities and should not push the mining companies to do all the social development projects;
- CSR programmes by mining companies should be done in collaboration with government agencies in order to ensure its sustainability;
- CSR should not be left to chance without detailing to investors what their responsibility will be in the area they are investing in;
- For a lasting impact, CSR should also be driven by the Ghana Chamber of Mines;
- The government should provide some kind of incentive to companies that are doing well in terms of CSR. For example, tax incentives and award schemes of some sort will encourage all companies to be more serious with CSR;
- Regulatory agencies should first of all enforce current laws and regulation, and review existing laws to conform to international requirement;.
- These Guidelines are needed to streamline the numerous activities that mining companies undertake under the CSR umbrella. Some of the activities appear to be of cosmetic value with no direct input from mining communities. Sustainability therefore becomes a problem;
- CSR Guidelines should be incorporated into the Mining and Minerals Law of Ghana;
- There is also the need for an institution or secretariat for monitoring and regulating CSR of mining companies. This can be added to the duties of the Minerals Commission or EPA;

- The Guidelines should not be restrictive or stifle innovative ideas of the companies;
- District/Municipal Assemblies should play supervisory role only. They should not be made to implement CSR projects.

8.4 *Wassa Association of Communities Affected by Mining (WACAM)*

When WACAM was contacted, they were of the view that:

- Mining companies should initiate CSR programme in communities in which they intend operating before they even start serious mining activities;
- Mining companies should involve District/Municipal Assemblies in their CSR programmes;
- Funds disbursed for CSR must pass through the government with a mandated institution like the Minerals Commission to supervise;
- Needs assessment should always be done before CSR programmes are implemented;
- Companies that violate/neglect CSR should be stopped from operating till necessary programmes are met. Institute a fine system for negligence; and
- Measures should be put in place to ensure transparency in performing CSR.

8.5 *Environmental Protection Agency (EPA)*

The EPA also suggested the need for:

- Mining companies to develop one programme at a time;
- CSR to be backed by law so that companies would be obliged to undertake projects for frontline communities;
- Rating system of companies by authorities to force them into action; and
- Monitoring to be part of annual report.

9.0 CONCLUSION

The knowledge and understanding gained during the stakeholder consultation and engagement process have provided the consultants with the requisite information to tackle the rest of the assignment. Based on the stakeholder workshop and final field study, policy recommendations on the Guidelines will be made for consideration by the Minerals Commission. The Guidelines will be enriched immensely by the views and suggestions made by all stakeholders.

APPENDIX I

ISSUES AND SUGGESTIONS MATRIX