RESEARCH REPORT OF GOOD GOVERNANCE AFRICA, WEST AFRICA

STUDY REPORT ON COMMUNITY INVOLVEMENT PLAN FOR MINERAL RESOURCE DEVELOPMENT



A STUDY REPORT ON COMMUNITY INVOLVEMENT PLAN FOR MINERAL RESOURCE DEVELOPMENT



SUBMITTED TO

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About Good Governance Africa

Founded in 2012, the Good Governance Africa is a registered Not for Profit Organization (NPO) with centers in Accra, Ghana covering Anglophone West Africa except for Nigeria which has an independent center in Lagos. For Southern Africa, GGA has centers in Johannesburg, South Africa and Harare, Zimbabwe. New centers have been opened at Goree Institute in Dakar, Senegal to cover Francophone West Africa and Addis Ababa, Ethiopia called the AU Centre.

Good Governance Africa aims to promote good governance in Africa through applied research and critical debate (advocacy). Our publications include Africa in Fact, the African Survey and other projects. Research areas include local governance, land and natural resources, early childhood education and national security. GGA West Africa is also concerned with the promotion of local economic development, urban governance, right to information, justice and accountability, innovation, environmental sustainability (including climate change issues) and leadership.

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List of Acronyms

CDA	Community Development Agreement
CIP	Community Involvement Plan
CSR	Corporate Social Responsibility
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EITI	Extractive Industry Transparency Initiative
FPIC	Free Prior Informed Consent
GGA	Good Governance Africa
GRI	Global Reporting Initiative
ICMM	International Council on Mining & Metals
IFC	International Finance Corporation
MAC	Mines and Communities
UNGC	United Nations Global Compact
SLO	Social License to Operate

Executive Summary

he extractive industry, including mining and oil/gas projects, has been experiencing increased public scrutiny and criticism for the environmental, social and economic trade-offs made into project development decision making. The proliferation of the media has allowed host communities to amplify their concerns regarding the adverse effects of projects such that local and national events become a global one. The opposition by local stakeholders results in non-regulatory barriers to developments that have severe consequences on the proponent and government (regulator). When a project loses its social license to operate (i.e. community stakeholders' acceptance and approval.) it creates corporate reputational challenges to the proponent and loss of public confidence and support of government decision making in approving the development. The reason oftentimes assigned to the loss is ineffective community involvement in the project decision making from project onset.

In Ghana, local community stakeholders have opposed natural resource development, while local regulators have largely promoted its economic benefits. The recent trend involves companies' adoption of corporate social responsibility as a tool to gain the social license to operate in local communities through the provision of economic and infrastructure benefits to the local stakeholders. These interventions; however, are achieved at the expense of local communities' governance capabilities leading to local opposition to projects.

The development of the oil resources and recent government decision to develop the bauxite resources have generated a lot of public discourse about the impacts of mining. Therefore, this is a timely study to explore how mining host communities can effectively express their concerns during project development and operations to ensure the incorporation of their needs into project approval decision-making. However, these communities cannot effectively contribute to mineral development governance issues without empowerment. The expertise of Good Governance Africa in strengthening governance issues would be beneficial to these communities. The primary objective of the study is the development of a model for optimal community involvement in decision making in the

extractive industry. The findings would provide a strong basis for promoting mutual understanding in the development of natural resources.

Methodology

The study adopted the Mixed-method analysis based on quantitative and qualitative content analysis of literature from three sources. The task performed included the qualitative review of peer-reviewed articles to analyse the international voluntary and corporate initiatives for the promotion of sustainable mineral development. Further, an analysis of the case studies of successful mining operations was conducted to identify the elements of social licence to operate (SLO) for successful mining operations. The investigation continued with a combined content analysis of newspaper articles regarding concerns from communities about mineral development. This was done with databases that reflected both the global and local perspectives. Central to this analysis was the need to understand the effective ways through which communities could contribute to shaping the decision making and the project planning processes with regards to the development of mineral within their localities.

Findings

The study revealed that mineral development proponents usually have corporate-level vision and commitment that includes elements of SLO mainly centred around respect for human rights, transparency and sustainable development. The fundamental challenge to these obligations is operationalising it across the mine life cycle.

The second finding showed that the local communities' concerns regarding operations of mining firms were dynamic across the mine life cycle. The local communities' concerns peak at the exploration to operations stages of the mining life cycle both globally and locally. Nevertheless, other phases of mine life cycle received a significant proportion of community concerns. It implies when SLO is attained, it must be maintained as the mine development continues until its closure. The key management strategy is to provide avenues for a continuous dialogue, through periodic review of approved agreements reached with communities.

Thirdly, the study also led to the development of a community development model, which outlines the list of items to be implemented as applicable to any mining stakeholders towards attaining and maintaining SLO. It



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provides the main community areas of expectations, as well as elements and procedure to be operationalised by mining firms as well and regulators to live in harmony with their host communities. The model captured various concerns regarding mining operations at the different mine life cycle along with themes of concerns of communities based on multiple indicators.

Policy Recommendations

Overall, the quest for community involvement in mining decision making will not be accomplished without an adjustment to the existing policies. The study recommends the development of a community engagement framework to guide proponents regarding the involvement of local communities in projects. Secondly, the mobilisation of communities to engage with mining proponents should be funded by the Government to encourage community capacity building, where necessary experts (consultants) should be hired to guide communities to understand the impacts and suggested mitigations. Further, it is recommended that the engagement of communities is seen as the responsibility of the government, as this can help to build trust in the regulatory process. The loss of social license by a corporate mining firm affects the government of the mineral endowed nation.

In Ghana, the community involvement model applies to any mining project as applicable to its stage in the mine life cycle, such as a guide to involve communities in the current project plans to develop bauxite resources.

Foreword

The research report on "Community Involvement Plan" discusses the subject of Social License to Operate (SLO), which is a key term used to describe mining communities' acceptance of mining firms operationalising on their lands and in return deliver development returns to their communities. According to the research findings this has become a worldwide area of concern in communities where mining takes place. This, the Study observed is due to mistrust by the communities as their expectations of the mining firms change over time due to such tendencies as the non-adherence to laid down protocols, non-delivery of development promises, lack of inclusivity in decision making on issues bothering the growth and development of the communities, etc.

The withdrawal of SLO by mining communities according to the research findings hamper greatly the operations of the mining firms as well as the revenue projections of central and local governments who are regulators of mining activities in most cases. A vivid impact is thus projected on how such events if not professionally and tactically tackled could even lead to the premature closure of such mining operations. The research report cites cases where such events happen and identifies some lapses in the operations of some firms that led to such avoidable incidence. Furthermore, the Study rightly reveals the growing concerns of mining cities in Ghana over the environmental impact of mining activities which is compounding the withdrawal of SLOs. Aiding the calls for such withdrawals is the growing strength of the media including social media. The stories of remote mining communities can now be easily carried to strong and vocal media outlets in the cities and the effects of such reportage almost always deal a negative blow to the fortunes of the mining firms and the central government.

A notable issue addressed in this Report is how the firms decide on the development initiatives for the communities as part of their Corporate Social Responsibility (CSR). A worrying trend the Study reveals is the top-down approach where the firms decide on their own or carry from elsewhere initiatives that more often than not do not address the needs of their host communities. This has been partly so as some of the firms view CSR as a



Foreword

mere marketing tool being used to soar up the image of the firms and meeting certain international protocols rather than impacting on the lives of the people on whose lands the firms operate. This worrying narrative which seem to resonate in similar studies should be effectively addressed going forward and the research makes some recommendations to this effect.

The Researcher has been forthright in recommending practical steps to addressing current developments practices for the mining firms and their host communities which when followed can go a long way to address this worrying tendency of SLO being withdrawn. The model for effective stakeholder engagement proposed in this report could be a game changer in cementing the ties between mining firms and their host communities. The Good Governance Africa Center, a strong advocate for upholding good governance principles such as transparency and inclusiveness is therefore glad to have had the opportunity of funding and providing technical participating in this study. The Center believes a strong commitment by parties in the mining sector to adhere to all protocols and the lines of engagement as clearly depicted in the model contained in this Report will be a good forward to achieving cohesion among all stakeholders particularly the firms and the communities.

The main subject of the research work which would have been very technical and difficult to understand by lay persons outside the field of mining, planning and engineering perhaps, has been expertly dealt with in plain and simple language for easy assimilation by all. One will find the Report exciting to read in its simplicity and at the same time its findings compelling enough to ignite advocacy to change narrative of the interplay between mining firms and their host communities.

Tina S. Asante-Apeatu Executive Director, GGA-WA

Acknowledgement

The Good Governance Africa (GGA) West Africa Office extends its appreciation to the Research Team led by Dr. Aimann Sadik. The Center appreciates the detailed work executed within a timeous manner in spite of the limitations posed by the raging corona virus pandemic. Indeed, the tact and expeditious manner with which such a useful research work was conducted, clearly indicates how as development actors we can rise above challenges to deliver our work for the upliftment of humanity irrespective the times within which we are.

To the research and coordination team from GGA-WA, the Center is proud of you for your impeccable call to duty in steering this assignment to a successful end. The journey to actualizing the recommendations in this report may have just started but the successful completion of the report nevertheless is hereby applauded. Together with various stakeholders in the mining sector in Ghana, we are hopeful that the results of this research work will further enhance active participation in decision making in the sector and bring about harmony in the work processes of the mines and the development of the communities.

On behalf of the Research Team, the GGA-WA Center also extends appreciation to the institutions and individuals who made time to contribute their knowledge and provide information for the enrichment of the Report. With such continuous commitment to supporting national assignment, the country will gradually inch closer to the development ideals we all expect as a people.

Last but not the least, to our editors, proof readers and graphic designers, your inputs and professional touch to this report has edified the work of the Center and made it more appealing to our esteemed audience and stakeholders. We say "ayekoo" to you all for your dedication to the course of developing our country Ghana and Africa as a whole.



Chapter 1 BACKGROUND OF STUDY

1.1 Introduction

he extractive industry defined here as mining industry (natural resources and energy sectors) has made significant strides to contribute to sustainable mining, whereby the economic benefits of exploitation of non-renewable mineral resources balance the adverse environmental and social impacts. When mining host communities support the development and operation of the mine, the balance is accomplished. In the absence of this balance, the operations would face significant risk to the success of the project. Protests and blockades follow the rejection of projects by mining host communities and result in project disruptions including postponement, cancellations and shut downs. These disruptions would result in significant financial consequences as well as security and public relations concerns for the affected companies.

The social networking over the internet makes local issues a global one; which would impact on shareholder value by increasing cost in managing the problems and decreasing the market perception of the ethical and sustainability practices of a company (Heffron et al., 2018). The extractive industry has adopted the Social License to Operate (SLO) to mitigate the environmental and social challenges of the sector as well as protect the reputation and legality of mining operations (Que et al., 2019; Heffron, 2018). The SLO is described as the approval of mining operations by the host communities in addition to its legally granted approval by the host government (Nwapi, 2016). Unlike the formal government approval process, SLO is typically obtained through relationship building with local communities. Thus, SLO has become a robust risk management tool for the extractive sector to manage community expectations and involvement in projects that affect them. The extractive industry has actively engaged local communities to extract information about their preferences with the expectations to be incorporated into formulating effective SLO policies and strategies. However, many new and operating mining projects continue to face stiff opposition from local communities when they feel their concerns are not captured in the regulatory approval process.

Ghana is not an exception to this global trend regarding ineffective community engagement that has led to significant unrest in mining commu-



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Background of study



nities. The challenges outlined falls within the interest of the project sponsor, Good Governance Africa (GGA) that promotes the empowerment of local communities in governance issues. The findings from this study would inform a framework for improving the involvement of mining host communities in decision making regarding projects and ultimately equip communities with knowledge and skills to meaningfully engage with corporate extractive firms and government. Further, the primary objective of this study is to explore avenues to empower communities to participate in the governance of mineral development at the local level through an effective community involvement model.

The extractive industry has adopted and implemented various mechanism that facilitates SLO through some international policy regulatory frameworks from several organisations: including the International Finance Corporation (IFC), International Council on Mining & Metals (ICMM), United Nations Global Compact (UNGC), the Extractive Industry Transparency (EITI), and the Global Reporting Initiative (GRI) (Wang, Awuah-Offei and Yang, 2016). These frameworks focus on a range of SLO aspects to address the social risks associated with mining operations. For examples, the Voluntary Principles



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on Security and Human Rights and U.N. Global Compact address the SLO in terms of human right issues. At the same time, the IFC stakeholder engagement guide focuses on effective stakeholder engagement aspects of the SLO.

Similarly, industry bodies, including the ICMM have adopted self-regulation to seek members commitment to attain and maintain SLO (Heffron, 2018). Where the industry has committed to these frameworks, most have failed to obtain the SLO due to ineffective community engagement. The lack of SLO has emerged as an evolving global risk to mining operations due to potential effects to access capital or total loss of license. According to Ernest Young (E.Y.), since 2015 SLO has been among the top ten (10) risks in the mining and metal business; and remain top-ranked in 2019 and 2020 (E.Y., 2020). Therefore, it is imperative on the sector to reconfigure their future and existing operations to reflect the shifting societal expectations. While the extractive sector has recognised community engagement as the pillar to SLO, its focus remains on addressing business-related social and environmental goals.

Collectively, scholars have identified community engagement as the best practice for understanding the behaviour and interest of local mining stakeholders in designing SLO strategies. The main challenge with attaining SLO lies in the extent to which local communities are involved in the decision making about the mine development. The status guo where decision-making is driven only by regulators and mining companies without addressing the concerns of the mining host communities creates a negative perception. Typically, the mining companies incorporate local community perceptions and preferences into formulating SLO management strategies based on corporate quantitative methods, which could have no relevance to the community.

Additionally, the communities would have limited access and understanding of the information that informs the decision to approve a mine development. The availability of information in a transparent manner shapes the community perceptions and ultimately, community acceptance (Jijeleva & Vanclay, 2017). Specifically, when communities are of the perception that the government regulatory approvals did not consider their significant concerns, their negative response may undermine the legitimacy of the project. The involvement of local communities in the regulatory framework is under the environmental impact assessment (EIA) stage of the project development. The EIA provides communities with the opportunity to review project documents and identify any gaps in the information presented in



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the environmental impact statement (EIS) and submit their concerns that should be considered before a decision is made on the project. Effective engagement leads communities to have trust in the regulatory decision-making process which in turn gains legitimacy or regulatory SLO.

In summary, SLO from communities is of two types: the legitimacy that mining proponents attain through engagement and consultation in the mine lifecycle and the legitimacy of the regulatory decision-making process at each phase of the mining cycle (Heffron et al., 2018). A meaningful engagement to a community would involve the consideration of their concerns into the initial mining development plan and availability of all information that is necessary for the decision-making process. Historically, the local communities have no trust in the information from government and mine proponent due to their perceived development interest. However, an independent review by external stakeholders with technical expertise is more trustworthy.

Most of the mineral endowed nations have mimicked regulatory frameworks to seek communities' input in the regulatory approval process. For example, the Ghana EIA regulation requires regulators to conduct public hearings for projects that received adverse public reaction. The regulatory body would hold a public hearing where stakeholders and proponents are brought together in a forum to express their opinions and offer suggestions on a proposed project to influence the decision-making process. The procedure for compliance with environmental assessments is under the Environmental Assessment Regulations, 1999, or Legislative Instrument (LI) 1652 of which regulation 17 specifies the conditions that oblige EPA to hold a public hearing on a project with adverse effect. However, additional public participation is embedded in the subsequent permitting and licensing process from screening to the final decision of an application.

Further, mining proponents used public forums or similar public hearing to seek community input to the design of the social responsibility programs to address the fundamental infrastructure challenges of their host community. These processes that call for community engagement are expected to grant SLO to proponents for a successful operation. Although community engagement is key to obtaining SLO for mining project, the process of community involvement in decision making is challenging due to the lack of systematic approach. For example, despite mining host communities have expressed concerns regarding resettlement negotiations and inadequate compensation for land access, such problems are persistent





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(Andrews, 2016). The unsatisfied local communities would embark on actions that will disrupt and even halt operations at the mines to register their dissatisfactions. It is therefore crucial for such negotiations to be based on the agreed process, and community engagement should be conducted in good faith to address the development needs, devoid of mistrust.

The requirements of mining stakeholders such as the global mining industry body, financiers of mineral development projects and international development organisations to ensure effective stakeholder engagements has strengthened the need for the development of effective business operations with the local communities. Most of the CSR programs are company-led with a limited partnership with local communities (Coumans, 2010; Vintro and Comajuncosa, 2010). Nevertheless, the extractive sector will publish their CSR practices and aspirations as their sustainability disclosures alongside annual mandatory business reports to demonstrate good corporate citizenship.

In Ghana, the extractive sector resource is situated in areas with development challenges; hence, the industry enters the community with their prescriptive CSR programs to obtain SLO. The input from communities is therefore sought through one-off forums to fulfil regulatory requirements instead of addressing the concerns of the communities. Hence, it is common to see the mining industry mimicking projects of each other. For example, Ghanaian mining communities have been "flooded" with infrastructure development such as roads, clinics and schools and investment in the local people with or without non-governmental organisations to acquire entrepreneurship skills (Hilson & Nyame, 2006). The corporate approach of investments in local sustainability projects of their choice, non-inclusive mechanisms of involving the concern of communities in the design of development projects and one- size fits all sustainable development strategy for distinct communities are ineffective (Cameron & Potvin, 2016).

Further, the process of seeking community input through public forums or similar forms of a public hearing process to design and implement CSR is inherently flawed. The power differentials in negotiation capabilities between the actors (mining companies and local communities) and non-existence of any set of enforceable rules as a way of determining community sustainability preference are problematic. Generally, the significant challenges with addressing the concerns of the local community is due to lack of community involvement in identifying priorities.



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Moreover, the implementation of CSR practices comes at the operation stage of the project development while the communities' immediate concerns regarding the project impacts from the onset remain unaddressed. Where attempts were made to engage and consult with the local stakeholders, it is often inadequate and too late in the mine life cycle. Additionally, the regulatory body involvement in addressing local community concerns are slow and reactive. Typically, the regulator would be satisfied with conceptual design and mitigation commitments proposed by the proponent before issuing environmental permits to commence activities. When opposition to the development becomes intense, regulators will request proponents to undertake additional meaningful public engagement with local stakeholders. The regulator would also make repeated attempts to enhance public education and awareness of the technical sufficiency of the development.

Although the local population may have concerns that cannot be fully addressed through engagement and consultation or proposed mitigations by the proponent, these inherent challenges associated with developments are avoidable when the local stakeholder's concerns are managed from the onset of the project. The identification of concerns of the local stakeholders and collaboration to find mutually acceptable solutions is critical for the timely government decision on the project to meet the national development agenda. Meaningful community involvement would be achieved when full mine life cycle local stakeholder's engagement and consultation is implemented.

In Ghana for example, the CSR programs are limited to providing solutions to fill the economic and infrastructure gaps but at the expense of improving community empowerment resulting in continuous local opposition. This current study explores into ways to develop an optimal CIP model to promote responsible natural resource development is timely considering the public discourse about the expected bauxite mine development and recent oil field discoveries. An optimal CIP would provide adequate opportunity for communities to express their concerns during project development through the mining life cycle to ensure their needs are met. It is essential to conduct an in-depth analysis of public engagement and consultation approaches to obtain SLO in the extractive industry to develop an effective CIP model. The GGA commissioned this research in this context through a mixed-method approach to identify elements of optimal community involvement plan in the extractive industry to promote timely, collaborative, acceptable approvals of a project by community stakeholders to promote



sustainable mining in Ghana.

Previous studies have employed different methods to determine the effectiveness of community engagement in obtaining SLO. The study by Andrews (2016) applied a gualitative approach of interviewing (semi-structured interviews and focus group discussions) regulators and corporate mining representatives in Ghana to explore the influence of domestic regulations and government regulatory measures in fulfilling community expectations to obtain SLO through CSR. Similarly, Mononen and Saarinen (2020) used semi-structured interviews and gualitative content analysis to demonstrate how mine development gained and kept SLO in Finland. Also, Nyembo & Lees (2020) applied qualitative interviewing to identify the several factors that impact on the communities' ability to "grant" a social license. Further, Mercer-Mapstone et al. (2018) interviewed 560 Australians living close to mining or natural gas development across 11 non-metropolitan regions in Australia through survey research to determine the role of dialogue and relationships in influencing social acceptance of mining via a large-scale, quantitative survey in the Australian mining context. Additionally, Jartti, Litmanena, Lacey, & Moffat (2020) used semi-structured methods to measure attitudes to mining among the public; as well as, Wilson (2016) used qualitative interview skills to explore local perspectives on constituents of social license within the Russian context.

Many previous studies and similar ones have related the role of community engagement in achieving SLO; however, the contribution of local community perceptions has not been adequately addressed. Further, where community perceptions have been captured, it was mostly historical without considerations of the current feelings of the community (Jijelava & Vanclay, 2017). Collecting real-time feelings of community displeasures about mining activities has the potential to reveal pertaining issues that have not been adequately addressed by other methods. The study posits that mining communities' concerns reported in the media are the reflections of the pressing issues at that phase of the mine life cycle.

1.2 Good Governance Africa's work in Ghana

Good Governance Africa is a registered Not for Profit Organisation (NPO) aimed at promoting good governance in Africa through applied research and critical debate. In this regard, GGA commissioned this study to explore ways that local mine communities would effectively contribute to sustainable mining by granting mining proponents the SLO. This study aims to examine the development of an optimal community involvement



plan (CIP) model to promote responsible natural resource development.

1.3 The Objective and Scope of the Current Study

The goal of this research is to identify elements of optimal community involvement plan in natural resource development to promote timely and collaborative acceptance of a project by mining host communities.

Objectives of the Research

- Identify public engagement and consultation best practices in the extractive industry that promotes mutual coexistence between stakeholders;
- Develop a community involvement plan model;
- Evaluate the current local communities concern regarding mineral resource development industry of Ghana within the proposed model; and
- Identify and recommend an optimal community involvement plan model for the extractive industry of Ghana to promote sustainable development.

1.4 Conclusion to Chapter One and the organization of the report

This chapter provides background information regarding the efforts of the extractive sector to address challenges associated with their host communities in the quest for sustainable mining development. Although community engagement has been deemed as a useful tool towards mutual coexistence, the tensions between these stakeholders remain, leading proponents to lose their SLO. The need to develop a model as a tool to promote community involvement in mining project is the purpose of this study.

The report is organised into six chapters. Chapter 1 provides an introduction and background to the study while the literature review is captured in Chapter 2, to provide the theoretical background and analytical framework of SLO. The research design and methodology are presented in chapter 3, followed by the findings and discussions in chapter 4. A summary of the results to the study and lessons learned are presented in chapter 5. The report concludes with Chapter 6 outlining policy recommendation for achieving SLO.



Chapter 2 THEORETICAL FOUNDATIONS AND ANALYTICAL FRAMEWORK

2.1 Introduction

This chapter explores the literature on community involvement in obtaining and maintaining SLO. The result is the basis for the formulation of the conceptual model and the analytical framework that provides the overall approach of the study.

2.2 Legal requirement to voluntary practices: Corporate Social Responsibility as SLO

Generally, governments of nations endowed with economically mineable resources devise regulatory frameworks as well as incentives to attract mineral investments such as lax environmental regulations and tax breaks. The operations of the extractive industry pose adverse ecological and environmental effects; hence, governments of these nations have established environmental management regimes designed to foster environmental protection through permits and approvals enshrined in regulations and other requirements. The environmental governance relies on the use of environmental impacts assessment (EIA) for decision making, national laws that address specific environmental sectors for environmental protection, and reports, permits and fines for environmental enforcement. With the global quest for sustainable development amid negative environmental and social impacts of mining operations concerns are under intense public scrutiny (Wang, Awuah-Offei, Que and Yang, 2016).

The adoption of CSR has allowed the extractive industry to adopt measures to internalise their negative externalities by self-adaption of rigorous standards to demonstrate their commitment to sustainable development. While the core intent of CSR is to address stakeholder and social expectations as a business strategy; however, it is characterised by the absence or low level direct local community participation in information gathering and decision making without addressing community interest. To address this gap, SLO was conceived as a mechanism to operationalise a company's CSR commitment whereby local stakeholders can engage and communicate their concerns and



expectations (Robinson, Fardin & Boschetti, 2020). Moreover, as an element of CSR, SLO strengthens CSR values through accountability and credibility for industry and stakeholders (Meesters & Behagel, 2017). An SLO is in existence when a mining operation receives broad community approval and acceptance through a process of ongoing negotiation with local stakeholders.

2.2 The components SLO

The pyramid model SLO is widely used by scholars as the best model to demonstrate the process for obtaining and maintaining SLO (Debrah, Mtegha &Cawood, 2018). According to Boutilier & Thomson, (2011) the pyramid model SLO is a continuum of four levels: no SLO (withdrawal/ withdrawn); acceptance, approval; and co-ownership (identification), which are centred on a company's ratings based on the degree of legitimacy, credibility and trust via community perception, Figure 1(Jijelava & Vancaly, 2017). Legitimacy sits at the base of the pyramid as it shows the acceptance



Figure 1: The Pyramid Model of stages of obtaining SLO (Adapted from Bouthillier and Thomson 2011)

of the project/company based on appropriate regulatory approvals for the start of the project and plans for the distribution of the benefit as in line with community values (Gehman et al. 2016, Jijelava & Vancaly, 2017). When this is achieved, the SLO process moves to the credibility stage, where the community assess how the company implements its commitment. At this stage, transparency is critical in the dialogue that ensues with the community as well as, the community approvals based on credibility judgement and advancement of relationship building. The project then moves to the trust stage where shared interest between stakeholders and the corporate body established grow into co-ownership and support to be identified with the project (Gehman et al. 2016).

2.3 Factors that contribute to Social Acceptance

The pyramid model above revolves around dialogue with the community to gain acceptance. Nevertheless, the diversity in community members' beliefs, interest and demography make the social acceptance very dynamic as perceptions change with time during the operation of the mine. The stable environment for mineral development is a measure of social acceptance, an indicative measure of SLO achievement in mining, and it is governed by relationship and dialogues with the community (Jijelava & Vancaly, 2017). In Mercer-Mapstone et al. (2017) study to determine the role of relationship and dialogue to influence social acceptance, the authors concluded that enhance positive dialogue develops into a stronger relationship with officials of mining companies and creates perceptions that procedures are somewhat leading to acceptance of projects. Dialogue is the best engagement mechanism because it is a fundamental instrument for community engagement strategies by the extractive sector for a stable SLO and allows the voice of community members to be heard. There are two dialogue models associated with SLO: the learning dialogue and strategic dialogue model. The learning dialogue model involves learning without any form, agenda or expected outcome and purposely for mutual learning.

In contrast, the strategic model is a structured dialogue with specific anticipated outcomes, in this case, SLO other than mutual learning (Mercer-Mapstone et al., 2017). The current practices of engagement frameworks of public participation, community engagement, community relations, and corporate communications are indicative that the strategic model is the most reliable approach. The structured approach is what favours the dominant regulator and government stakeholders in the extractive industry seeking economic gain, although this goal-oriented approach limits opportunities





Mining community members protesting lack of jobs and poor development of their communities

source: graphic.com.gh



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for learning and relationship building. Meaningful dialogue in the context of SLO should consist of a mix of strategic and learning dialogue models other than a predefined box-ticking exercise. The mining proponent needs to ensure the commitments on the delivery, and that promises are fulfilled; to ensure flexibility in the process to allow input and adjustments to accommodate community concerns where applicable as well as to being transparent and respectful (Mercer-Mapstone et al. (2017). Essentially, the SLO should be obtained through a collaborative and relationship-building approach with mining communities and just not as a single bid to seek approval or build a reputation.

2.4 Avenues for public engagement and consultations within the mining development phase

The key element of a democratic governance is the power or rights of citizens to select a government in a participatory voting process. Such rights have been extended into citizens' participation in government decision-making regarding projects developments to safeguard the public health and protection against arbitrary decisions. The role of public involvement is captured within the mine life cycle and strengthened by community access to information. These lead to community empowerment in participating in the decision-making process and voice concerns about granting licenses to the proponent. A mineral development project starts with a proponent's acquisition of mining permit/lease for concession from the government regulatory body. The proponent follows up seeking access to the concession through private land, including farmland for exploration activities. Landowners and company officials would involve in negotiations for such entry through lease and outright purchase of the land beneath which the mineral resource is located. While this first encounter is not a legal requirement, its purpose must be based on standards and best practices; otherwise, when trust is broken, it would be the beginning of a weak SLO.

Further, the proponent would also conduct open house and workshops to share project information with community; and documents such processes and findings to inform its environmental assessment of the project in documents to be submitted to government regulators collectively known as the EIS. The EIS is a document usually prepared by a third party on behalf of the proponent but reviewed and accepted by the national environmental protection agency as the basis for environmental approval and subsequent permitting and licensing. Additionally, the opportunity



Galamseyer at work source: graphic.com.gh for community participation is at the proposed project environmental assessment phase through corporate open houses; meetings with primary stakeholders to present project information to the community and solicit their feedback and providing access to the EIS.

At this stage, the communities would have had a lot of information about the project and identified concerns, which the proponent must accommodate and mitigate. Further, community participation would be required as part of some permitting requirements for expansion and development of operations. Other avenues for community participation are through corporate mining firms' commitments including company policy, international agreements, community-company agreements, industry and sector initiatives to address SLO elements. Moreover, the input of communities in community development agreements (CDA) between their local governments and proponents would be fulfilled

through community participation at an open house or serving as monitors of implementations and management of such agreements. As illustrated, the moment a company's foot is at the door of the community to initiate mineral development project, communities must participate throughout the mine life cycle, thus, purposely above the minimum legislative requirement (Zheng, Manshe and Moffatt, 2018). Nevertheless, these avenues for participation would be ineffective if it is limited to just consultations without direct involvement in the decision-making process.

2.5 The Media role in SLO

The local, national, and international stakeholders and local communities have used the media to voice out their frustrations with mining companies' operations. The rise in internet accessibility and globalisation can quickly diffuse local anti-mining issue to the global audience and affect the profitability of a mining firm. More significantly, the advent of social media allows issues of the local communities to be communicated uncensored and relatively quickly (Ignatov, 2016) to draw attention to problems within the mining industry (Kirschke, 2013). Similarly, the same outlets have been adopted by corporate mining companies to demonstrate their community engagement practices. According to the media-agenda setting theory, the frequency of media attention to any topic is directly related to the degree of salience of the issue to influence public concern (King, 2008). As such, sustained media attention to community concerns regarding mining operations





Theoretical Foundations and Analytical Framework

exerts pressure on corporate executives due to seemingly available support for the community's concerns. Even only one news article regarding the community's concerns on the adverse practices of a mining company would create reputational damage (Mononen and Saarinen, 2020). When the corporate executive receives such negative feedback, it allows the re-evaluation and changes in their current practices and implementation of alternatives. Considering the best avenues outlined above in meaningful community participation in mining to gain SLO, it is evident that mining stakeholders and government have operational options to achieve SLO. The significant gaps identified in previous literature informed this study to focus on the challenges with gaining and maintaining SLO without considering the underlying cause. The lack of systematic process for integrating community concerns into project development and decision making is a significant gap identified.

This current study aims to fill this gap by identifying the critical elements of successful SLO by drawing on all the essential elements for meaningful public engagement. Specifically, it is proposed that satisfying the initial engagement requirements of the mine life cycle will be at the centre of the model and a stronger predictor of community acceptance of mining operations. The suggestion here is that, the extent to which an extractive resource company engages at the initial contact with communities and enter into community development agreement will, determine the level of attainment of SLO. Essentially, the extent of the corporate level commitment and the accommodation of significant community concerns into project plans will shape the community trust in the firm and lead it to gain SLO.

2.6 Analytical Framework.

The analytical framework developed for effective community engagement is shown in Figure 2. Step 1 involves the identification of the elements of effective community involvement from su ccess stories and voluntary practices for obtaining SLO. Step 2 is the need to conduct a content analysis of community concerns as captured by the media. The results from stage one and two are then integrated to develop a community involvement plan /model. Step 3 is the identification of local community concerns of Ghana from newspaper sources followed through the lens of the developed model to determine compatibility and conformance to develop and recommend an optimal community involvement plan model for the extractive industry of Ghana.



2.7 Conclusion

This chapter has outlined the avenues and challenges for achieving SLO. The chapter ends with an analytical approach to be used in identifying the gap in the literature. The application of the analytical framework is illustrated in the next chapter.



Figure 2: Analytical framework



Chapter 3 STUDY DESIGN AND METHODOLOGY

3.1 Introduction

The design and methodology of the study are outlined below. Multiple sources of issues and information extractions require both quantitative and qualitative approach; hence a mixed method was employed to allow in-depth content analysis and integration of information.

3.2 Study design and methodology

The study adopted a mixed-method approach to identify, investigate and analyse the constituents for developing an optimal community engagement model for the extractive sector. It started with the identification of SLO elements in the voluntary initiatives of the global mining industry body, financiers of mineral development projects and international development organisation literature. A second literature review conducted focused on case studies of mining operations in an environment devoid of protests and acts of sabotage and potentially full of valuable insights about acquiring and maintaining SLO.

In the next step, a content analysis of news articles of the mines and communities (MAC) database was conducted to identify the global mining host communities' expectations at every stage of the mining life cycle within the period 2015-2019 to reflect current issues. The MAC website is owned by charitable organisations that demand greater accountability and transparency on the part of the minerals industry (MAC, 2020). It is a network of indigenous and solidarity non-governmental organisations (NGOs), representing many thousands of people directly affected by the mining industry. The MAC website has ten themes of news articles regarding various categories of mining impacts. For the context of this study, the human right theme was found to be the appropriate source of articles regarding communities' expectations. Approximately 150 news articles were selected and analysed for patterns, trends and relationships with an interdisciplinary focus (political, socio-economic, science and technology) to codify community expectations based on emerging indicators. The indicators were then categorised into themes. Different themes and related indicators were grouped by frequency of the counts at every stage of the mine life cycle when concerns were raised. Similarly, the articles from the Ghana web



database regarding local communities' concerns were also analysed as described above. The Ghanaweb website is a one-stop source of Ghana news articles from primary sources.

3.3 Literature review- Elements of Stakeholder best practices

3.3.1 Best practices based on success stories

Success stories were deemed as the appropriate tool for understanding community engagement in perspective. A multiple case studies approach was adopted because it allows a holistic understanding of issues as well as a strong basis for conclusion than a single case study (Cesar, 2019). Secondly, the study adopted case studies from Peru because it is a significant mineral endowed nation, which attracted extensive global media attention regarding delays, postponement or cancellation of large mining project due to community unrest. The selected cases focused on mining companies that have obtained their SLO based on study conducted by Cesar (2019).

3.3.2 International Initiatives

The study adopted the self-regulation and industry efforts that facilitate SLO described in the survey study by Heffron et al.; 2017; which represent although not exhaustive the popular initiatives with the extractive industry. These were constituted to ensure mining activities are beneficial to the community when the targeted element of SLO are observed.

3.3.3 Media Analysis

The analysis of media coverage was carried out to identify communities concerns that were reported in the media due to activities of mining firms. As Jijelava & Vanclay, 2017 posited, the timing of data allows the identification of impacted stakeholders as well as the "fresh" accounts about their experiences when events occurred. In contrast, it is difficult to collect reliable data about the perceptions and experiences of people when time elapses. The collation of community concerns as reported by media is a reliable source, despite the potential effects of media agenda setting to influence public discourse.

3.4 Conclusions

The research methodology has been outlined in this section of the study to discuss the rationale for the approach and steps undertaken. The research findings are discussed in the next chapter.





Chapter 4 FINDINGS AND DISCUSSIONS

4.1 Introduction

The results of the study and analysis are covered in this section based on the objective of the work.



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4.2. Identification of elements of community involvement model public

4.2.1 Success stories of SLO attainment and maintenance

The key considerations for the selection of cases are their successful approaches to mining-community collaboration to attain and achieve SLO as highlighted in Table 1 below. The cases demonstrate how three different mining firms attained SLO in the early part of the mine development or made efforts to correct deteriorating situations due to communities' frustrations with mining activities. A proponent's initial interaction with potentially affected local community members shapes the attitudes of the local communities towards a proposed project. However, when engagement processes fail to address the expectations set by the initial contact, there is the risk of negative feedback from the residents and feeling that engagement was disingenuous. For example, The Tintaya Copper Mine demonstrated the importance of extending the engagement process beyond meeting the legislative requirement. It appears the initial engagements did not address the local community's concerns and needs regarding environmental effects and compensation due to the project impact (Table 1).

Although the response from the company was reactive, the corrective actions adopted by the company helped it to regain the local community support. The company carried out repeated dialogues and extensive commitments to invest in the community as well as third party technical studies to evaluate community concerns regarding specific impacts due to the projects. The proponent's efforts renewed collaborative relationships with the community that advanced to mutual coexistence and stable business environment. Where the communities did not raise any concerns at the initial phase of the development of the project, the communities appear to be satisfied with the initial proactive steps of the proponent. In the case of the Corani project mining corporation project, the communities formed a positive attitude towards the project because the proponent was proactive in approaching the communities with respect as well as understanding the unique culture of the Coranity Table 1. A similar effective initial engagement also paid off for The Ollachea Project.



Table 1: Elements of successful engagement with mining host communities in Peru

Company	Community issue	Initial company strategy	Mining cycle stage	Community engage- ment strategy towards attaining and maintaining SLO
The Tintaya copper mine	•Objections to land purchases agreement •Perceived environmental impacts	•Meeting all regulatory requirements and paying taxes	•Post-explo- ration	 Repeated dialogue to address concerns and build relationship and trust in under- standing the project. Technical studies to address technical concerns Company-community agree- ment to receive % of profits Foundation established to fund community activities and skills acquisitions Consent of communities to be sought before carrying out a new process.
Corani project mining corporation		•First contact respectful approach with door to door visit and sought permis- sion to explain the project to community members	Pre-explo- ration Hired local experts at the exploration stage to explain the project to members of their community	 Unexpected adverse outcomes on families due to high incomes were reassessed. Baseline studies, surveys and research were developed and reassessed engagement strategy. Sensitisation by trained local professionals provided more project information to the community leading to gaining trust and acceptance. Lifetime agreement with communities' goals via funding projects pre-development and production stages Dual management committee including a company with no voting powers
The Ollachea Project		Many efforts to understand community unique identity and culture Exploration created jobs.	•Top execu- tives involved in the relation- ship-building process and company commitments.	 Small scale miners allowed to mine lower ore grade zones Sponsored provision of infra- structure for cultural activities and events. Signed 30 % surface agree- ment and 5% participation interest

Source: Cesar, 2019

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However, it appears the critical element of the initial engagement is the commitment of investment of funds into the community's development. All the three projects made similar commitments, including the establishment of community development foundations, sponsorship packages and donations of a percentage of profits to the community. Indeed, effective initial engagement builds a collaborative relationship with community members that leads to a successful mineral development project. For successful SLO, mineral development proponent needs to adopt the mix of the learning dialogue and strategic dialogue models posited by Mercer-Mapstone (2017) beginning from the initial community engagement strategy. The proactive steps to engage earlier with communities would result in more beneficial discussion of the mine plan, the range of possible alternatives to the mine plans as well as CSR activities and their impacts. A recent example of such a proactive plan is the Newmont Ahafo Development Foundation. Newmont Ghana Gold Limited made a pre-mining voluntary commitment to contribute \$1 per ounce of gold sold and 1% of net pre-tax annual profit from its mining operation in the Ahafo community to run the foundation agreements. Prior to the operations stage, Newmont developed a resettlement plan based on major input from the local community, which led to the development of traditional subsistence agriculture and support to develop market economy agricultural and small businesses (Holley & Mitcham, 2016)

4.2.2 Industry and Corporate best practice

As discussed earlier, international, and corporate based initiatives generally focus on issues regarding human rights, transparency and engagement as SLO elements to address community concerns. Although a mining community might lack the capacity to understand the meaning of such initiatives, an extractive company that is a signatory to these international regulatory framework regimes gives the community confidence of acceptable practices. At the initial engagement with the community, mineral development proponents would communicate their corporate commitments, visions, mission statements and memorandum of understandings (MoU) related to this voluntary initiative to bolster claims of good corporate citizenship. The study identified five international organisations initiatives and one industry initiative related to human rights, stakeholder engagements and transparency SLO aspects (Table 2). The initiatives would be provided to the communities with the project information document at the initial engagement stage as part of the project information document.



Table 2: International and industry initiatives for support of the extractive industry

International Initiatives	SLO Aspects	Brief Description
The Voluntary Principles on Security and Human Rights	Human rights	Governments, companies and NGOs that have established international standards for safety and security in extractive industry operations.
Extractive Industries Transparency Initiative	Transparency	Global best practices standards for the governance of the oil, gas and mineral resources sectors.
U.N Global compact	Human rights	Ten principles for sustainable corporate practices human rights, labour, environment and anti-corruption.
International Finance Corpora- tion –stakeholder engagement;	Stakeholder engagements	Best practices for stakeholder engagement.
Free Prior Informed Consent (FPIC)	Human rights- consent	Seek free consent of indigenous people concerns about project impacts and seek their consent freely prior to project com- mencement and extended to international efforts and industry self-regulatory efforts that vol- untarily incorporate human right in their CSR frameworks.
Mining International Council on Mining and Metals – 10 Principles	Sustainable development, - including upholding human rights (Principle 3); continual improvement in environmental performance (Principle 6); and social impact management in local communities (Principle 9)	Sustainable development princi- ples that companies must agree to adopt based on the Rio Dec- laration, the Global Reporting Initiative, the Global Compact, Organization for Economic Co-operation and Development (OECD) Guidelines on Multina- tional Enterprises, World Bank Operational Guidelines, OECD Convention on Combating Bribery, ILO Conventions 98, 169, 176, and on Security and Human Rights

Source: Heffron et al., 2017.

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4.2.3 Media

The study identified four themes, namely: concerns regarding the environment; Free Prior Informed Consent (FPIC); absence of consultations and human rights violations; for the in-depth understanding of community issues due to mining operations. The themes represent a grouping of indicators including loss of sacred land/religious/cultural site; police brutalities; protest by communities and inadequate consultation for relocations and resettlement (Table 3). Further, the results indicate that the global mining host communities' concerns range from potential direct impacts and non-technical issues such as the right to participate in decision making as well as seeking consent.

THEME	INDICATORS
Environment	 Loss of sacred land/religious/cultural site Farmlands/sources of indigenous food Natural cover/rain forest Source of water/wetlands/ecosystem/ river pollution Threats to livelihood General impacts
Free Prior Informed Consent	 Rights violation No consent Lack of empowerment
No Community Consultation	 New law not retroactive Public hearing venue far from the community Lack of consultation of local community Change in regulatory policy and law Inadequate compensation
Human rights violation	 Police repression Death Arrest Tribal rights violation Protest Relocation protest.

	Table	3:	Indicators	and	themes	from	newspaper	analysis
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Source: Researchers own construct, 2020.



Typically, issues regarding such non-technical indicators are found in corporate-level vision statements, MoUs, community development agreement (CDA) and other initiatives signed with different stakeholders. The figure below presents the percentages of the frequency of counts of data on the global mining host communities concerns on proposed or operating projects. Mining communities' concerns showed variations across the mining life cycle. The communities' concerns across the mine development cycle spiked at exploration and operations phases where the communities began to recognise the actual effects at approximately 42% and 25.2% respectively, Figure 3.



Figure 3: The levels of community concerns across mine cycles

Generally, the local communities concern in terms of the themes decreased in the order environmental; lack of consultation; human rights violations and free prior informed consent at 41.9%, 29.0%, 18.3% and 10.8% respectively (Figure 4). Moreover, Figures 5 to 8 presents the communities concern at the level of the indicator of each of the themes. As expected, the level of concerns differs across each specific indicator. The "loss of sacred land/religious/cultural site" indicator of the environmental theme is the principal local communities concern followed by concerns regarding widespread impacts, Figure 5.







Figure 5: The indicators across environmental themes



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The "no consent" indicator was the primary indicator of the FPIC theme (Figure 6) while the "lack of consultation" theme was dominated by" no local community consultations" indicator (Figure 7). The human rights violations theme is dominated by protest due to mining and deaths as a result of restraining operations by government security forces due to mining related issues (Figure 8). In summary, the issues about "land" were persistent across the phases of operations. The results indicate communities' concerns leading to loss of SLO varies across the stages of mining.





Figure 8: The indicators across human right violations themes



September, 2020



4.2.4 A Community involvement plan model

The best practices identified from the literature review and from the analysis of the community issues were synthesized to develop a model framework for addressing community concerns in mine development (Figure 9) and the resulting model is Figure 10. Essentially, meaningful community engagement models a corporate policy across each mining phase. The model identified the SLO components that a company would have via its corporate vision and commitments (the top horizontal row of the model) as well as community-based issues that would typically be a concern when a mine is being developed (the subsequent section of the model).



Figure 9: Model Framework





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Throughout the development of the mine, the community's perceptions shift as project awareness increase or accustomed to the project's impacts. This model has established the various components of a community involvement plan that mining proponents and regulators need to address towards achieving SLO.

4.3 Evaluation of the current CSR practices and the related public engagement and consultation practices in the natural resource development industry of Ghana within the proposed model

The Ghanaian mining host communities' concerns are presented in Figures 11 to 15. Concerning the mine cycle phases of mineral development, it generally showed similar characteristic as the global trend above, except that there were indicators that were absent in the Ghanaian context. The Ghana local communities concern across the mining cycle phases was varied, including no issues at the construction and closing phases of mine development, Figure 11. The average concerns of local communities exceed those at the global level at the environmental assessment and operations phases. However, "local communities' concerns are present across all the themes, particularly the environmenttheme and lack of consultation theme, where concerns were most dominant (Figure 12). Nevertheless, the variations between local and global concerns are similar across all the themes.

Similarly, in terms of indicators, the correlation across each theme showed a weak relationship. For example, across the environmental theme, the local communities have no concerns regarding the "loss of sacred land/religious/ cultural sites" (Figure 13). Further, the theme "FPIC" in relations to particular concerns were more directed to "lack of empowerment indicator" and "no consent" but none regarding any human rights violation indicator (Figure. 14). The local Ghanaian communities are more concerned about the indicators: "no compensation" "no local community consultations" and "public hearing far from the community" across the lack of compensation theme, Figure 15. Finally, in terms of human rights violations theme, the local communities are more concerned about "arrest and "deaths" due to security agencies crackdowns, Figure 16.



Ghana National Association of Small-Scale Miners (GNASSM) experts demonstrate and explain to gold miners at the Tarkwa hard rock mine in Ghana about the GOLDROP machine and process, during an on-site test of the method.

source: instoremag.com

Figure 11: Global and Ghana local communities concerns comparison across mine cycle phase



Figure 12: Global and Ghana local communities concerns across themes



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Figure 13: Global and Ghana local communities concerns comparison across environmental theme indicators



Figure 14: Global and Ghana local communities concerns comparison across FPIC theme indicators



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Figure 15: Global and Ghana local communities concerns comparison lack of consultation theme indicators



Figure 16: Global and Ghana local communities concerns comparison across HRV theme indicators



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The illustration of the trends and analysis of the percentage distribution of themes and indicators or absence/present of local communities concerns along the global trends are not to assign a degree of importance or salience; instead, it is to display the "spread" of the information regarding community concerns. All issues identified are relevant concerns to local communities; and it must be noted that even if one negative issue about mining operations gets media coverage; it could cause significant reputational damage. The compatibility of the local communities concerns of Ghana against the developed community involvement model was evaluated. Figure 17 demonstrates the optimal community involvement model for the Ghana mining sector.



The model highlights the optimal indicators and themes that are compatible with the model in black fonts. In contrast, the local communities concern that were not present in the global model are depicted in red fonts.

4.5 Conclusion

This chapter has illustrated the various concern of mining host communities and continuous change within each phase of the mine. There are avenues for obtaining and maintaining SLO should extractive sector work with communities in good faith. As a result, an effective community involvement model is a template to guide this path and demonstrated in the Ghanaian context.





Chapter 5 SUMMARY OF FINDINGS AND LESSONS LEARNED

5.1 Introduction

This chapter summarizes the findings of the study and recommendations for improving the identified gaps. The results are organized into the relevant gaps identified and recommendations for fixing them.

5.2 Lack of systematic ways for implementing community

engagement

The study indicates that the extractive sector is aware of the advantages of the recognition of the rights of communities and the need to treat them as legitimate partners in mineral development. It is evident by their commitments to various international and industry-wide initiatives related to aspects of SLO such as compensation negotiations and protection of the rights of local communities as their corporate-level commitments before engaging with communities. The primary reason for the ineffectiveness is due to the lack of systematic process for providing communities with the opportunity to provide input into project decision making.

As illustrated in the findings of this study, where a structure was adopted through effective community engagement with transparency and commitments, corporate mining firms worked in harmony with communities. Hence, when the extractive sector shows clarity in articulating how resource development supports the community's short and long-term vision for the future, SLO would be attained and maintained. Mining firms must turn their commitments into measurable projects to address communities need and concerns

5.3 Dynamics of community concerns

The study revealed that the community concerns regarding activities of extractive sector evolve with time as the mine development advances due to better understanding of the process and experiences with the operations. Despite the differences across all phases of the mining life cycle, they were more communities concern at the pre-development phase and operations phase, which could be attributed to perceived concerns and concerns due to experiences with mining operations respectively. It is common to see a mining company that lives in harmony with local communities would



face stiff opposition should it plan an expansion. As a result, effective engagement with communities should include monitoring implementations of commitments as well as periodic review in light of the circumstance of the day. This would allow a continuum of SLO and win-win situations for the mining stakeholders.



Chapter 6 POLICY RECOMMENDATIONS

6.1 Introduction

This chapter looks at recommendations that would contribute to the sustainable development of the mining industry.

6.2 Development of community engagement and consultation framework

Without calling for a review of mining laws, governments of mineral endowed nations, in this case, Ghana needs to develop a clear guideline regarding the involvement of local communities in developing mining projects. The guideline would list expectations and requirements as part of the environmental approval application. Additionally, the mining proponent would be required to submit its community engagement plans and evidence of implementations with communities. Acceptance of the plan should constitute part of environmental approvals requirements for mineral development. The report could include accommodations that were adopted to mitigate communities concerns where necessary. A project proposal should not be presented to communities as the final project plan but as a working document that is modifiable to address communities concern.

6.3 Participation funding for community engagement

When a company loses its SLO, the ripple effects spread to its host government. Although regulators make efforts to promote mutual coexistence when this occurs, it is often too late, and reputational damage is hard to mitigate. Hence, the government must fund the local communities' involvement and hire technical experts to help them understand the proposed project and potential effects as well as the proposed mitigations. Such funds must come with requirements for local communities to demonstrate legitimate concerns in a form of report to government regulators. The availability of government funding will address the issue regarding the capacity of communities to seek their rights through participation. It would also lead to more substantial involvement as legitimate partners in developing an acceptable plan. The public engagement plan should ensure affected individuals and communities have a full understanding of the overall project.



6.4 Participation of regulators should be a requirement

Often community's concerns are linked with blames of the with regulatory approval processes because the involvement of government at the community level comes very late in the process. The engagement should not be the sole responsibility of the mining proponents. Additionally, the government needs to update communities regarding the regulatory process to build communities trust in the system. Further, the participation of regulators in environmental assessments process would send a strong message about government commitments to ensure sustainable mineral development. The involvement of the government should exceed notifying the local communities; instead, they should include presenting the regulatory process to the community.



President Akufo-Addo exchanging pleasantries with executives of Anglogold Ashanti Obuasi Mine

source: www.cedidollar.com

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