



January 30, 2024

Our Response to the Aluminum Stewardship Initiative's Provisional Certification of Compagnie des Bauxites de Guinée

The Aluminum Stewardship Initiative's (ASI's) provisional certification of Compagnie des Bauxites de Guinée (CBG), despite ongoing social and environmental impacts not yet addressed by the company, exposes flaws in ASI's standards and processes, which undermines the initiative's utility as a due diligence tool for the aluminum industry. Companies linked to CBG through their supply chain should not rely on this certification for their own human rights due diligence. This statement corrects the record on key issues.

ASI is a membership organization that offers accreditation to mines, refineries and smelters within the aluminum supply chain. Accreditation is based on third-party audits that assess members' operations against ASI's standards for responsible aluminum production. In December 2023, ASI granted [provisional certification](#) to CBG—a joint venture between the Guinean government and multinational mining companies Rio Tinto, Alcoa, and Dadco—for a period of one year, despite [ongoing and unremedied social and environmental harms resulting from its mining operations](#). The firm BM Trada conducted the audit.

Bauxite from CBG is processed into aluminum that ends up in consumer products sold around the world, including electric and other vehicles made by major global brands, soda cans and other food and beverage containers. ASI certification, albeit provisional, wrongly suggests to aluminum buyers and consumers that bauxite sourced from CBG qualifies as part of a responsible aluminum value chain.

Since 2020, Inclusive Development International, CECIDE and ADREMGUI have served as formal advisors to 13 communities affected by CBG's mine, seeking remedies for the human rights impacts of the company's operations in Sangaredi, Guinea.¹ **CBG is working to improve its environmental and social practices and its relationship with affected communities, and in recent years has made progress in mitigating the impacts of its operations. When CBG fully remediates the harm it has caused and ensures that local communities benefit from the company's ongoing operations, then certification of CBG's social, environmental and human rights performance would be warranted. However, this is not yet the case.** Indeed, the

¹ In 2016, the International Finance Corporation (IFC), the World Bank's private-sector arm, along with a consortium of other banks, provided a loan to expand CBG's operations. Inclusive Development International, CECIDE and ADREMGUI assisted 13 affected communities to lodge a complaint with the IFC's accountability mechanism, the Compliance Advisor-Ombudsman (CAO), in 2019. The complaint details how CBG's activities—historically and following the IFC investment—have breached IFC's environmental and social requirements. As a result, CBG and the communities are now engaged in a mediation process facilitated by the CAO. Our organizations are serving as advisers to the community representatives in this process. While it has yielded some positive results, including on safeguards around the use of dynamite blasting and access to water, the process is ongoing and many significant environmental and social harms remain unaddressed. These include loss of land and livelihoods, impacts on natural water sources, dust affecting air quality and crops, impacts on local connectivity, and impacts on cultural heritage sites, among others.

vast majority of harms remain unaddressed. These include massive land-takings that have displaced local communities, often without consent or compensation; failure to effectively rehabilitate mined agricultural and grazing lands; impacts on rivers, streams, and springs that served as essential sources of potable water and water for household use, agriculture and other economic activities; and negative impacts on biodiversity and wildlife.

When CBG and other companies are awarded the ASI stamp of approval without first meeting their environmental and human rights responsibilities, it serves to greenwash the serious impacts on livelihoods and living conditions that communities face. It could also undermine the communities' efforts to secure remedy, prevent further harm, and ensure their rights are fully respected by the mine — all responsible actors have a role in ensuring that the positive momentum towards remediation is not adversely affected by ASI certification, and instead continues and grows.

We provide the analysis below to set the public record straight and particularly to make clear to companies that source from the mine that they should not rely on the ASI audit for their human rights due diligence. Our analysis below is not exhaustive but points to a few key areas in which the ASI audit is not a reliable reflection of the human rights situation on the ground.

ASI's audit report downplays or ignores serious harm caused by CBG's operations and the company's failure to provide remedy to affected communities

1) Economic displacement

Loss of livelihoods and economic displacement triggered by land-takings and destruction of agricultural areas are among the most significant impacts of bauxite mining — a form of mining that involves excavating the surface of huge expanses of land often previously used by local communities. Mining-induced economic displacement deprives affected families of their economic resources and ability to earn sufficient income, access food, and meet other daily needs. In Sangaredi, communities have lost and continue to lose vast swaths of arable and grazing land to CBG's mining operations, receiving neither adequate compensation nor replacement land.

These impacts are largely ignored or misrepresented in ASI's summary audit report, which focuses on CBG's resettlement *policies* (as opposed to real world impacts). The report discusses the experience of only one village, Hamdallaye, which was physically displaced (i.e. their houses and entire village were moved to a new site), while ignoring the economic displacement faced by many others, including those triggered by the recent expansion of the mine and mining infrastructure.

The audit report alleges that “compensation is always provided to those affected persons who will lose their crops and arable land.” In direct contradiction to this finding, according to the 13 communities with whom we work, with the exception of Hamdallaye, CBG has not provided compensation for lost land, whether in the form of cash or replacement land. Affected communities have received compensation for crops and trees, but the adequacy of this compensation is disputed by the communities. Based on recent community accounts, since 2019, CBG's policy is to provide livelihood support programs to economically displaced communities for a period of three years, but those programs so far have not resulted in tangible improvements in income or food generation for most of them.

CBG has committed to eventually return land to communities when its mining activities are completed but does not provide any specific timeline as to when that will happen or the process for doing so, and we are unaware of any land having been returned to date, in some cases many years after it was taken.

Regarding ASI's Performance Standard on Resettlement,² the auditors only find a "minor non-conformance" related to reduced income levels in Hamdallaye village after relocation and other unspecified targets for that resettlement that have not been met. This is an impact that affected families do not consider minor. In fact, it is acknowledged in publicly available sources that the income generating activities put in place by CBG for Hamdallaye has dramatically failed.³ More recent efforts to reestablish agricultural activities in a zone provided by CBG in 2022 are also at risk due to scarcity of water in dry season, according to community members, notably women who are particularly concerned.

Beyond the economic displacement experienced by Hamdallaye, the audit finding completely disregards the serious impact of economic displacement faced by many other villages. A bauxite mining company's environmental and social performance cannot be meaningfully assessed without considering the impacts of economic displacement on local communities.

Astoundingly, the audit report also finds that CBG is in full conformance with ASI's Performance Standard on Local Communities (livelihoods),⁴ despite numerous communities having lost access to traditional income-generating activities without adequate compensation or replacements. In its analysis of CBG's adherence to this standard, the report references the livelihood support programs provided by CBG without questioning their effectiveness at increasing household incomes and the results for communities.

2) Impacts on rivers and streams

Pollution of rivers and streams, caused by sediment and gravel run-off from mining plateaus, mining roads and other mining infrastructure during the rainy season is a major issue affecting communities living near bauxite mines, including CBG's. Yet it receives scant attention in ASI's report.

Fassaly Foutabhe, a village that has been severely affected by mining activities but was not visited by ASI auditors, has suffered major impacts on their water sources, which also affects the environment and biodiversity. Since 2019, Fassaly river and the headspring have been nearly unusable for the community's needs—including drinking, cleaning and cooking—due to high turbidity, potentially caused by CBG's blasting operations according to the annual reports of the firm conducting environmental and social monitoring of CBG performance.⁵ Although these impacts have been

² Performance Standard V2 9.6.

³ See, Ramboll Environmental and Social Monitoring Report – March 2022, p. 78-80. Available at: http://cbg-guinee.com/en/publication_manager/monitoring-audit/

⁴ Performance Standard V2 9.7.c. We note that this ASI standard is extremely weak despite how crucial the issue is for people's lives. It requires only that: "The Entity shall explore with local Communities opportunities to respect and support their livelihoods."

⁵ See, Ramboll Environmental and Social Monitoring Report – March 2022, p. 56; Ramboll Environmental and Social Monitoring Report – December 2022, p. 54. Available at: http://cbg-guinee.com/en/publication_manager/monitoring-audit/

documented in publicly available sources, they do not receive any attention in ASI's summary audit report. We are aware that CBG has been working with external experts to find a solution to the problem, but these efforts have not yet resulted in any improvement in water quality.

In relation to the sediment run-off problem, the audit report only notes that “(r)etention basins are in use for the collection of surface wastewater during the wet season,” and that “before each wet season, all sediment and refuse material collected in the retention ponds is removed from these basins to avoid final discharge to water bodies outside the operational areas.” The report does not provide further information as to how the audit team has verified the performance of these ponds across CBG's mining zone. It should be noted that the team visited the mine site during the dry season, in May 2023, and thus presumably did not have the opportunity to observe them in operation. The effectiveness of sedimentation ponds only becomes evident during the rainy season when any malfunctioning and run-off can be observed. In fact, we are aware from our own observations and community testimonies that these structures have failed to prevent sedimentation at various times, affecting the water quality in the Thiapikoure river as recently as July 2022 and the Lafou river as recently as October 2023⁶, which are both essential water sources for the nearby communities. CBG has made important improvements to sedimentation basins in 2023, especially around the Thiapikoure river, which we applaud. However, because of the scant information in the summary audit report, it remains unclear to us what exactly was considered by the audit team and whether and how they verified that CBG's recent mitigation efforts are sufficient to prevent negative impacts.

Despite the ongoing issues and lack of clarity on the effectiveness of the recent mitigation measures, the audit report finds CBG's operations in full conformance with the Performance Standard on Discharges to Water.⁷ The fact that the summary audit report does not include any discussion of the actual impacts of mining on water sources and communities' access to clean water may be due in part to ASI's and the audit team's shortcomings in engaging affected people (see below sections for more details) as well as ASI's focus on company policies and systems rather than the actual impacts on the ground.

3) Other impacts on local communities

Communities living nearby the Sangaredi mine area experience, on a daily basis, impacts from increased dust, noise, vibrations and accidents caused by mining roads and railways, dynamite blasting, surface miners and other mining operations. These cause huge disturbance to their lives, including effects on their health, the productivity of their crops and trees, and the health and safety of their cattle.⁸ Destruction of community roads has also impeded mobility and exchange between villages as well as their access to basic services such as health facilities and schools. While ASI's Performance Standard on Local Communities,⁹ requires entities to “take appropriate steps to

⁶ Thiapikoure was affected by the sediments running off from the nearby mining haul road, and the Lafou river was affected by the gravel run-off caused by the new mining road construction near the Kagnaka plateau.

⁷ Performance Standard V2 6.2.

⁸ More information on these impacts can be found in our [complaint](#) to the Compliance Advisor-Ombudsman.

⁹ Performance Standard V2 9.7.b.

prevent and address any adverse impacts on local community livelihoods,” the summary audit report provides no analysis of these impacts and whether and how CBG prevents or mitigates them.¹⁰

4) Inadequate rehabilitation of mined land

While CBG has accelerated land rehabilitation efforts in recent years, it has not restored the agricultural and grazing land it has mined to its original state, nor has it returned this land to communities to resume traditional economic activities. Meanwhile, CBG continues to take more land for the expansion of its mine and mining infrastructure and operates on multiple plateaus simultaneously for many years, without turning land over to rehabilitation in a timely manner. In the absence of effective and timely rehabilitation, communities’ livelihoods are threatened by the increasing scarcity of arable and grazing land in the area. The 13 communities we advise lament that they haven’t been consulted in the design of the rehabilitation program and that the efforts have so far been limited to reforestation of mined zones, not the restoration of agricultural or grazing function of the previously mined land. Some of these flaws in CBG’s rehabilitation program have already been documented in publicly available sources,¹¹ but are not addressed in ASI’s summary audit report.

ASI Performance Standard on Mine Rehabilitation¹² requires entities to “rehabilitate environments disturbed or occupied by mining activities, using best available techniques to achieve outcomes agreed through participatory processes with key stakeholders in the mine closure planning process.” The auditors find CBG in full conformance with this Standard and with Performance Standard on Closure, Decommissioning and Divestment,¹³ but provide neither an in-depth analysis of the quality of land rehabilitation done so far, nor an assessment of whether the rehabilitation takes into account community needs (beyond stating that CBG plants trees, such as cashews, which could generate added revenue for communities).

5) Ineffective grievance mechanism

For many years, CBG’s community-level grievance mechanism has failed to bring satisfactory resolution to community grievances.¹⁴ While CBG has recently made changes to increase the mechanism’s effectiveness, which has so far produced mixed outcomes, and communities are understandably skeptical. There is work to be done to earn their trust and convince them that the mechanism is worth using.

Under ASI’s Performance Standard, entities are required to implement a grievance mechanism that is “adequate to address stakeholder complaints.”¹⁵ The summary audit report outlines the

¹⁰ Two minor non-conformances are found under this Standard, but they are related to CBG’s stakeholder engagement activities and obtaining free, prior and informed consent from communities, rather than the impacts themselves.

¹¹ Ramboll Environmental and Social Monitoring Report – December 2022, p. 89. Available at: http://cbg-guinee.com/en/publication_manager/monitoring-audit/

¹² Performance Standard V2 8.5.

¹³ Performance Standard V2 2.8.

¹⁴ More information on the shortcomings of the mechanism can be found in our [complaint](#) to the Compliance Advisor-Ombudsman. The firm conducting CBG’s environmental and social monitoring had also found its grievance mechanism ineffective. *See*, Ramboll Environmental and Social Monitoring Report – October 2021, p. 30. Available at: http://cbg-guinee.com/en/publication_manager/monitoring-audit/

¹⁵ Performance Standard V2 3.4.

functioning of CBG's grievance mechanism but notes that "(t)he [upcoming] surveillance audit will include a focus on the complaints mechanism and its effectiveness." This acknowledges that the audit team has yet to evaluate the effectiveness of the mechanism, but CBG is nevertheless found to be in full conformance with this standard.

Furthermore, under ASI's Performance Standard on human rights remediation,¹⁶ the audit report notes that CBG's community grievance mechanism "is not necessarily effective" with respect to remediation of community concerns. Yet the auditors only find a minor non-conformance with this criterion. If a grievance mechanism is not effective at resolving community complaints, and complaints of human rights and other impacts have not been remediated (see further discussion below) the company should be found in major non-conformance on both the criteria on grievance mechanisms and human rights remediation.

In our view, the flawed findings are a direct result of ASI's standards and audit process heavily focusing on company processes and plans and treating them as a proxy for outcomes. Having processes in place is important, but it is no guarantee that they will be implemented effectively or provide tangible outcomes for the communities.

6) No remediation of human rights impacts

The complaint to the CAO that we submitted on behalf of 13 villages sets out in detail numerous adverse impacts of the mining operation that amount to violations of human rights enshrined in international law instruments.¹⁷ Human Rights Watch also sets out a number of human rights impacts in its report on the mining operation.¹⁸ Most pertinently, the impacts of the mine amount to non-respect for the right to an adequate standard of living, including food and housing, protected under art. 11 of the International Covenant on Economic, Social and Cultural Rights. As a business enterprise, under the UN Guiding Principles on Business and Human Rights, CBG has a responsibility to respect human rights of those affected by its operations, including by providing remedy when it causes adverse impacts. While some progress is being made by CBG, most of these continuing human rights impacts, coupled with and exacerbated by the recent impacts from the ongoing expansion of the mine, have not yet been remediated.

ASI's Performance Standard¹⁹ requires the entity to "respect Human Rights and observe the UN Guiding Principles on Business and Human Rights [...], including at a minimum: [...] Where the Entity identifies as having caused or contributed to adverse Human Rights impacts, it shall provide for or cooperate in their remediation through legitimate processes."

The audit report does not contain any discussion of human rights impacts whatsoever, let alone whether these are being remediated through legitimate processes. Under this criterion, it refers only to the visibility and proactive nature of CBG's Community Relations team and notes the problems

¹⁶ Performance Standard V2 9.1.c.

¹⁷ Complaint to the CAO, filed February 20, 2019 (section 3). Available at: https://www.cao-ombudsman.org/sites/default/files/downloads/Guinea_CBG_Complaint_ENG.pdf

¹⁸ "What Do We Get Out of It? The Human Rights Impact of Bauxite Mining in Guinea" October 4, 2018. Available at: <https://www.hrw.org/report/2018/10/04/what-do-we-get-out-it/human-rights-impact-bauxite-mining-guinea>

¹⁹ Performance Standard V2 9.1.

with the effectiveness of the grievance mechanism as described above — and then it grades CBG with only a minor non-conformance on human rights remediation.²⁰ This assessment lacks rigor and does not reflect the actual human rights situation on the ground.

The CBG audit outcome points to major flaws in ASI’s standards and processes

Based on our experience working with communities impacted by bauxite mining in Guinea, Inclusive Development International has advocated for stronger human rights protections in the aluminum industry as a whole. During ASI’s recent standards review process, we joined Human Rights Watch to submit [detailed recommendations](#) for how the initiative could improve their auditing and certification process to better identify environmental and social risk and ensure respect for human rights in the aluminum supply chain. ASI’s updated standards (Version 3), released in May 2022, reflect some of our feedback, but many concerns remain unaddressed. While CBG was certified against the earlier version (Version 2) of ASI’s standards, Version 3 retains many of the same shortcomings.

1) ASI’s “moment in time” approach largely ignores the ongoing impact—and a company’s ongoing responsibility to provide remedy for—harmful actions taken in the past.

ASI states that “audits are an assessment at a point in time, so they may not resolve legacy issues.”²¹ ASI’s approach largely focuses on an entity’s current social and environmental performance—in the case of CBG, actions the company has taken since it became a member of ASI in 2021. In addition to ignoring many of the impacts of recent and ongoing mining activities, it appears that the auditors have entirely disregarded the ongoing and unremedied impacts of so-called “legacy” harms that originated from company activities in the years prior. This is despite the fact that these activities continue to have widespread and devastating impacts on communities’ land, livelihoods and water sources. Without effective remedy for the full range of impacts, including those of ongoing nature, a company should not be able to receive certification that ostensibly attests to the company’s human rights, social and environmental credentials. This approach significantly undermines the utility of ASI certification as a due diligence tool as the human rights responsibility of companies linked to CBG include identifying and addressing these continuing impacts.

2) ASI’s assurance process does not ensure audits meaningfully reflect the experiences of affected communities.

²⁰ CBG audit isn’t the first time ASI overly focuses on the existence of a grievance mechanism to evaluate whether an entity provides remedy or not. For example, [summary audit report of UC Rusal](#) concludes that the company “has implemented processes for remediation of adverse human rights impacts” and simply provides a link to company’s grievance hotline without sharing any information as to how the grievances were resolved and harm was remediated. A similar example can be found in the [summary audit report of Guinea Alumina Corporation SA](#). The company is found to be in conformance with the Performance Standard V2 9.1.c on remediation although the audit report notes that the community “is aware of the new complaints ‘hotline’ system” but “there remains some resistance to its use in the community,” which puts into question the effectiveness of the said grievance mechanism let alone remediation of the actual impacts.

²¹ ASI, EU Due Diligence Regulations: What’s ASI’s Role? (June 12, 2023). Available at: <https://aluminium-stewardship.org/eu-due-diligence-regulations-what-is-asis-role>

While ASI's updated Assurance Manual requires that all audits include interviews with affected communities—something that was surprisingly not reflected in earlier versions and for which Inclusive Development International had advocated—it does not provide sufficient guidance. For instance, it does not provide guidance for how community members should be engaged, to ensure they are adequately informed about and prepared to take part in the audit or that they have an opportunity to verify the findings of the audit prior to its finalization. There is also insufficient guidance to ensure necessary steps are taken to protect individuals from retaliation. These gaps played out in CBG's audit process.

ASI did not provide mining-affected communities with sufficient information about the audit process.

Effective and meaningful community participation requires more than holding interviews with the affected communities during an on-site audit. It requires ensuring communities understand the purpose of the audit and its scope and have the time and resources necessary to prepare for engagement with the auditor. This means providing adequate notice to communities that the audit will occur and ensuring that villages and community members of their choosing are available to participate at a time convenient for them; ensuring that information about ASI, its standards, and how to participate is effectively disseminated across affected communities; and facilitating independent advice to help them prepare. We know this from experience, but it is also established best practice for sustainability initiatives such as ASI.²²

Unfortunately, neither ASI nor its auditors conducted any substantial outreach to affected communities to prepare them for the audit and to explain the ASI standards, the process, and its significance.

In the absence of any information or outreach activities by ASI, in late 2022, Inclusive Development International and Human Rights Watch held an information session with representatives from the 13 communities we work with, to explain what ASI is and discuss the upcoming audit and its implications. Following this meeting, community representatives chose to engage proactively with ASI, by [writing to ASI leadership](#) to communicate their concerns and request more information about the audit process, including the dates when the auditors would visit Sangaredi. In this letter, they made clear their desire to speak with the ASI team and auditors and to have their views heard. Inclusive Development International reached out to ASI to facilitate such a meeting and provided interpretation. (The audit report appears to downplay the role IDI played in proactively arranging the exchange between ASI and the community representatives on how the audit process can meet their expectations. It also wrongly appears to question the community representatives' role in crafting the requests in the letter.)

A virtual meeting was held between ASI and three community representatives with our facilitation in March 2023 to discuss communities' expectations from ASI throughout the audit process. While

²² According to ISEAL, an organization that establishes standards for sustainability accreditation systems and of which ASI is a member, credible stakeholder engagement “allows stakeholders to participate in decisions and hold the system to account...it strives to understand the context and perspectives of stakeholders who have been under-engaged or under-represented, and it creates opportunities to ensure their participation in decision-making.” In its credibility principles, ISEAL also underscores that stakeholders should “have the information they need to actively participate in decisions or raise concerns.”

some of their requests were fulfilled (i.e. interviews being held in the villages, being open to all village members, and taking place without the company's presence), some of the more substantial and important expectations were not met. For example, the community representatives asked that the auditors visit as many of the affected villages as possible and that ASI informs the communities in a timely manner of the audit schedule. The 13 communities we advise were not consulted on which villages should be visited nor informed of the schedule with sufficient notice. The villages were informed only one or two days before the auditors arrived.²³ Only three out of 13 villages that are part of the mediation were visited during the on-site audit.

Another request put forward by the community representatives was that the representatives of the 13 villages in the CAO-facilitated mediation process, which has been ongoing since 2020, meet with the auditors to help inform the audit process. They wanted to engage in the process because they have gained a deep and broad understanding of the impacts faced across the communities through their experience engaging with CBG on these issues through the mediation over the past three years. The ASI auditors, however, declined to meet with them.

No system was in place to guard against intimidation and pressure tactics nor last minute window-dressing.

In the absence of ASI's direct engagement with the affected communities during the pre-audit period, the company was left to inform the communities as it saw fit. Those communications included public advertising encouraging community members to support certification, direct engagement with affected community members encouraging them to speak positively about the mine if auditors approached them, and in some cases intimidation from parties claiming to act on behalf of or with the knowledge of CBG pressuring community members not to share any negative information with the auditors. (These pressure tactics and intimidations are downplayed in the audit report, which claims that they were not intimidating in nature and were in relation to the mediation process, although these happened in the lead up to the audit and some included direct comments about the upcoming on-site audit.)

We observed a blatant attempt at window dressing in one village, which we happened to visit in the days before the audit took place: Dozens of baby chickens were delivered to create the appearance of a vibrant livelihood restoration program, which had in reality been inactive and received no attention by the company for many months prior.

From what we and community representatives observed, ASI had no active systems in place to safeguard against such tactics, which are highly predictable. ASI had also not established a reliable and meaningful communication channel with the affected communities, which would have allowed them to be directly informed of such incidents.

3) ASI does not publish its full audit reports, preventing independent assessment of their quality and comprehensiveness, and withholding details needed to push for corrective action.

²³ ASI told Inclusive Development International, unprompted, that we and the other CSO community advisors should not attend the auditors' visits to communities.

We have repeatedly called on ASI to publish full audit reports, with as little information redacted as possible, to ensure transparency over audit results and push for corrective action. Such transparency is also accepted best practice for sustainability certification schemes.²⁴ However, ASI has only published a summary report on the CBG audit, which lacks important detail needed to support its determinations about CBG’s conformance with relevant standards.

The summary report provides no satisfying explanation of how community perspectives were weighed against the information provided by the company when evaluating its performance.²⁵ It may be that ASI’s full audit report provides more in-depth information on the auditors’ assessment and evaluations, but the public summary leaves the stakeholders in the dark as to how such determinations were made.

4) ASI’s practice of granting provisional certification enables companies engaged in significant ongoing harms to brand themselves as “responsible.”

ASI’s process is geared toward granting certification—even where the auditor finds multiple non-conformances on environmental, social and governance issues, in this case 13 so-called “minor” ones. The result is that companies are awarded certification, albeit provisional, where communities are experiencing serious harms. This sends the wrong signals to the market, enabling the audited company to brand itself as a responsible business, sufficiently respectful of human rights, social and environmental standards, with ASI’s stamp of approval.

While we understand that provisional certifications can be leveraged to push the companies to reach full certification by addressing the areas of non-conformance, we believe that ASI would have more leverage, whilst accurately reflecting the facts on the ground, if they were to withhold certification of any kind until the mining company has implemented its corrective plan, addressed the non-conformance, and demonstrated that it can and will provide effective remedies to affected communities.

Our Recommendations

For ASI

- We reiterate our call on ASI to update its standards and processes to address the weaknesses in their system, as we’ve outlined [here](#)—especially the shortcomings in incorporating community perspectives into the audit, which we have repeatedly raised in our communications to ASI and which have been highlighted once again by the CBG audit.
- The CBG audit results should be presented to affected community members, in a language and medium accessible and clear to them, so they can see how their testimonies were taken into account in the outcome of the audit. They should also be informed of the possibility of

²⁴ ISEAL credibility standards also underscore the importance of transparency, asserting that “A credible sustainability system makes important information publicly available and easily accessible.”

²⁵ Similarly, in the only other ASI audit of a bauxite mine in Guinea, Guinea Alumina Corporation SA (GAC), the summary audit report provided no substantive explanation as to why some of the serious impacts on communities were only seen as minor non-conformances. For example, the report found a minor non-conformance with the performance standard on resettlement on the basis that the company has “developed and implemented a comprehensive resettlement process” while, on the other hand, communities claimed that “there has been no improvement or restoration of livelihoods and standard of living for persons displaced.”

submitting a complaint with ASI's grievance mechanism if they disagree with the findings and certification.

- ASI and the auditors should meaningfully engage with the affected communities ahead of the upcoming surveillance audit, giving them an opportunity to share their feedback on the schedule and human rights issues to be assessed during the on-site audit.
- The surveillance audit should include a visit in the rainy season to observe the full range of impacts mining has on water resources, and to evaluate whether CBG's sedimentation control structures are effective.
- ASI and the auditors should ensure that the upcoming surveillance audit captures the experiences of affected communities; includes, at minimum, an evaluation of all human rights issues mentioned in this statement; and ensures that serious human rights impacts on communities that have not been remediated are marked as major non-conformances.
- Draft findings of the surveillance audit should be presented to affected communities for verification prior to the finalization of the audit process.

For buyers

- In light of the above-mentioned weaknesses in the ASI system, our conclusion is that ASI audits do not provide credible or sufficient information upon which companies can rely for their own human rights due diligence.
- We advise all companies, with direct or indirect supply chain links to CBG mine, not to rely on the human rights related information produced by the ASI audit, and to conduct their own due diligence by engaging with expert civil society organizations and the affected communities and reviewing other publicly available sources of information. Inclusive Development International, CECIDE and ADREMGUI can facilitate direct communication with community members and recommend constructive ways to engage to support remediation processes.
- ASI members should work with ASI to ensure that it updates its standards and processes to address the weaknesses in their system, as we have outlined above, especially the shortcomings in incorporating community perspectives into the audit.

For policymakers

- Policymakers should ensure that any new or existing human rights due diligence laws and similar regulations do not treat ASI certification as a proxy for supply chain due diligence.