In-Migration Management Plan

Version 2.0

January 2015

Yara Dallol Potash Project, Danakil Depression, Ethiopia

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LIST OF ACRONYMS

Abbreviation	Full Definition
ANRS	Afar National Regional State
CHSSP	Community Health, Safety and Security Plan
ES-MS	Environmental and Social Management System
ESIA	Environmental and Social Impact Assessment
IFC	International Finance Corporation
IMMP	In-Migration Management Plan
NGOs	Non-governmental Organisations
PIIM	Project-Induced In-Migration
SRPMP	Sourcing, Recruitment and Procurement Management Plan
SSA	Social Study Area
PS	Performance Standard
WkMP	Worker Management Plan

DEFINIITIONS

The following definitions are of relevance within this report:

- **<u>Social Study Area</u>** – the area where primary social baseline data was collected.

- **<u>Social Area of Influence</u>** – is indicative of the potential geographic extent of social impacts that may occur due to the Project. This has been developed based on the prediction of social impacts during the scoping phase of the Environmental and Social Impact Assessment (ESIA).

1   INTRODUCTION

Yara International is a leading global fertilizer company with sales of fertilizer to about 150 countries globally. As part of Yara International's overall upstream strategy, the company is exploring for suitable raw sources that can be developed and used as a source to Yara International's global fertilizer production and directly as finished product in its product portfolio. To complement these upstream processes, Yara International has recently started a subsidiary company, Yara Dallol BV, which is involved in the exploration and mining development of potash concessions in Ethiopia. These concessions are located in the Danakil Depression, Afar National Regional State (ANRS), Ethiopia. Yara International, through its subsidiary, proposes to develop a potash mine – the Yara Dallol Potash Project (hereafter referred to as the Project) within these concession areas.

As part of the environmental approval process for the Project a suite of environmental and social management plans is needed to address the issues identified in the Environmental and Social Impact Assessment (ESIA). Several management plans have been developed to address impacts identified in the ESIA and are implemented as part of an environmental management system for the Yara Dallol Potash Project.

Several activities associated with the Project, as well as the presence of other extractive companies, are expected to induce in-migration of job and business seekers into the Social Study Area (SSA) at a large scale. This In-Migration Management Plan (IMMP) has been compiled to address the specific impacts that are anticipated to occur as a result of planned mining developments as identified in the ESIA and associated impact assessment. This plan sets out a formal system by which Yara Dallol BV will manage mitigation measures that will reduce the impacts on Project induced in-migration.

1.1   POLICY STATEMENT AND OBJECTIVES

1.1.1   Policy Statement

The development of this IMMP has been guided by the Yara Dallol BV Health, Environment, Safety, Quality and Product Stewardship Policy, as set out in *Box 1.1*. This Policy is a high-level corporate statement of intent and establishes the principles to be followed in the management of environmental and health & safety issues.

Box 1.1   *Health, Environment, Safety, Quality and Product Stewardship Policy Statement*

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COMPANY COMMITMENT

Yara Dallol BV's aim is to establish sustainable growth and the creation of shareholder and societal value. Yara Dallol BV affirms to their stakeholders, including employees, customers and the public, it's commitment to continuously improve and reach standards of excellence in Health Environment, Safety, Quality and Product Stewardship through its operations.

ENVIRONMENTAL POLICY

Yara Dallol BV will manage its business in a life cycle perspective. In its operations, Yara Dallol BV will contribute to eco-efficiency by continuously improving energy consumption and reducing waste, emissions and discharges. Waste which is generated will be handled and disposed of safely and responsibly.

Yara Dallol BV will design its products and develop product applications to have the minimum adverse effect on the environment throughout their lifecycle.

HEALTH AND SAFETY

Injuries and occupational illnesses, as well as safety and environmental incidents, are preventable, and Yara Dallol BV's goal for each of these is zero. Yara Dallol BV will encourage its employees to adopt a healthy, safe life-style for themselves and their families.

Yara Dallol BV will be prepared for emergencies and cooperate with local authorities to establish and improve their emergency preparedness.

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Yara Dallol BV will, further, seek to monitor Project induced in-migration (PIIM) so as to avoid unplanned and unmanaged PIIM; mitigate and manage any negative impacts, and enhance and promote any positive impact related to PIIM that does occur.

1.1.2   *Objectives*

The objectives of this IMMP are as follows:

1. Monitor the scale of PIIM into the SSA and specific in-migration 'hotspots';

2. Avoid unplanned and unmanaged in-migration into the SSA; and

3. Mitigate and manage any negative impacts and enhance and promote any positive impact related to PIIM.

1.2   *PURPOSE AND SCOPE*

The purpose of the IMMP is to provide a clear set of actions and responsibilities for the control of impacts linked to PIIM within the Project's area of influence. This plan will be regularly reviewed and updated to reflect

revised Project design, socio-economic changes and learning experienced during its implementation.

1.3 LINKAGE TO OTHER ENVIRONMENTAL AND SOCIAL PLANS

This IMMP should be read in the context of the Environmental and Social Management System (ES-MS - discussed in *Chapter 13* of *Part I* of the ESIA). The ES-MS provides the framework for a suite of management plans, described in *Part III* of the ESIA, which have been designed to address social and environmental risks and impacts associated with the Project. It is recognised that the ES-MS and associated plans are living tools that will be constantly updated to accommodate changing circumstances. Specifically, this plan is related to the following management plans, described in *Table 1.1* below.

Table 1.1   *Details of Linkages between the IMMP and Other Management Plans associated with the Yara Dallol Potash Project*

Management Plan	Overlap of the BMP with Content of Other Plans
SOCIAL MANAGEMENT PLANS	
Sourcing, Recruitment and Procurement Management Plan (SRPMP)	Discusses the procurement of local goods and services in a manner that will seek to dis-incentivise opportunistic non-locals from migrating to the area seeking employment and economic opportunity.
Community Health, Safety and Security Plan (CHSSP)	Discusses the implementation of measures to avoid or mitigate impacts related to community health, safety and security reducing the potential for negative impacts caused by PIIM.
Worker Management Plan (WkMP)	Discusses the implementation of health and labour standards and workforce controls. This will be relevant for managing workforce-community interactions and reducing the potential for PIIM.
CLOSURE PLANS	
Integrated Mine Closure Plan (IMCP)	The IMCP will discuss how to manage the retrenchment of workforce during the decommissioning phase.

2 *SUMMARY OF LEGAL AND OTHER REQUIREMENTS*

A summary of the legal requirements and standards relevant to the IMMP are presented below.

2.1 *NATIONAL LEGISLATION AND POLICY*

Based on preliminary review no relevant national Ethiopian legislation was uncovered relevant to the requirements related to the management of PIIM.

2.2 *IFC PERFORMANCE STANDARDS*

The IMMP has been guided by international good practice regarding in-migration. This includes the International Finance Corporation's (IFC) handbook on PIIM, *Projects and People: A Handbook for Addressing Project-Induced In-Migration.*

Yara Dallol BV have committed to meeting the International Finance Corporation's Performance Standards for Social and Environmental Sustainability (*IFC PSs*). The IFC PSs do not include specific requirements regarding managing the potential for in-migration except that Yara Dallol BV will avoid or minimise the transmission of communicable diseases that may be associated with the influx of Project labour (Performance Standard 4: Community Health Safety and Security).

The commitments within the IMMP have been developed to ensure that Yara Dallol BV address their social risks and impacts through a management plan as required in Performance Standard 1.

The Environmental and Social Manager, Security Manager, and the Community Liaison Officer will be responsible for the implementation and management of all measures in relation to the IMMP. All employees including contractors (and their employees) will be required to adhere to the requirements of the IMMP.

Contractors will be required to take a level of responsibility for ensuring the application of this plan to their staff. This will be the responsibility of contractor staff, under the supervision of the Environmental and Social Manager.

With respect to this Plan, Yara Dallol BV has the responsibility to provide PIIM management and to structure and coordinate Project induced in-migration management procedures for the proposed Yara Dallol Potash Project.

Furthermore, Yara Dallol BV has the responsibility for ensuring that specific PIIM responsibilities allocated to them are organised and implemented. Yara Dallol BV has the responsibility to ensure that their employees and contracted third parties are trained and aware of all required PIIM procedures.

4 IMPACT MANAGEMENT

4.1 SUMMARY OF IMPACT MANAGEMENT

As with any project of this scale and nature, there are certain impacts that cannot be entirely eliminated, i.e., residual impacts after implementing mitigation measures. With respect to impact mitigation, the Project subscribes to the philosophy of impact avoidance (by changes to Project planning and/or design) and impact reduction (to reduce impacts that cannot be avoided to acceptable levels). What follows, is a description of the potential residual impacts and the mitigation measures proposed to reduce them to acceptable levels. These mitigation measures essentially comprise the "management plan" to address PIIM related impacts.

The following sections will:

- Identify potential impacts associated with each phase of the Project;

- Identify the objectives and targets related to the impacts;

- Describe the management measure(s) to minimise the impact; and

- Assign responsibilities for the management measures.

4.1.1 Summary of Impacts to be Managed

The IMMP has been developed to manage, avoid and mitigate and / or optimise a number of in-migration related impacts that are likely to result from the Yara Dallol BV Project. These include:

- Increased price inflation and economic vulnerability due to the arrival of migrants into the SSA, which may result in additional demand for goods and services causing an increase in the cost of basic goods.

- Increased demand for potable water due to increased population sizes and demands of multiple solution mining activities.

- Potential breakdown of traditional institutions, traditional leadership structures and cultural norms leading to a loss of community identity and resilience.

- Decreased food security through diminished communal and natural livelihood assets.

- Increased competition for natural resources, land occupation and use, and actual and perceived Project benefits and entitlements.

- Increased vulnerabilities associated with poverty, loss of livelihood assets and associated community status and domestic violence.

- Increased pressure on existing infrastructure, such as inadequate schools, health centres, waste disposal facilities and limited water supply network.

- Increased potential for the transmission of communicable diseases from in-migrant populations to local communities, with potential for epidemics.

- Increased disposable income may result in increased incidences of prostitution and casual sexual relations. These sexual relations could lead to an increase in STIs and an increased incidence of HIV/AIDS.

- Increases in anti-social behaviours due to the presence of in-migrants and a lack of knowledge of the local culture, beliefs, habits and rules of behaviour by outsiders may cause conflict.

- The presence of migrants can lead to a large increase in the quantities of solid waste with impacts on environmental health conditions.

4.2 MANAGEMENT DURING CONSTRUCTION

4.2.1 Potential Impacts

The impacts during construction will be similar to those identified in *Section 4.1.1*.

It is anticipated that the impacts during construction may be more significant than at any other time in the Project lifecycle. This is due to the currently low absorptive capacity for in-migrants within the SSA and the possibility for in-migration to occur, particularly when considered in terms of the number of in-migrants as a percentage of host community populations. This large rate may be caused by the presence of the 'pull factor' of the requirement for hiring of labour during the construction phase, which may be larger and more focused during this phase than at any other time.

4.2.2 Objectives and Targets

The objective of the IMMP is managing the identified impacts established in *Section 4.1.1*. *Section 7* identifies the specific targets and management measures associated with this phase of the project lifecycle.

4.2.3 Management Actions

In-Migration Management Forum

In order to appreciate the impact of PIIM on the area that is experiencing in-migration 'pull factors' from a number of projects developed at the same time Yara Dallol BV will consider establishing an In-Migration Management Forum

for the region (this may be undertaken as part of the Dallol Mining Forum). This will include participation from all neighbouring projects that may potentially contribute to increased levels of in-migration as well as local and regional Government representatives. If levels of in-migration prove to be higher than anticipated, such a forum may be required to mobilise the 'critical mass' that will be necessary to address negative impacts effectively.

In-migration Planning

Develop and implement an IMMP. The core components of the Plan will be:

- Communication;
- Engagement at a local / regional level;
- Minimising potential for in-migration;
- Managing and directing influx;
- Enhancing physical infrastructure;
- Building human capacity to manage influx;
- Monitoring and evaluation of in-migration; and
- Consideration of Project closure.

Monitoring and Managing In-Migration

An important step to managing PIIM effectively includes the development and implementation of a rigorous and regular monitoring and stakeholder engagement process. Monitoring will be conducted on a regular basis, to build up an understanding of in-migration patterns and trends.

Monitoring activities will take place on a six-monthly basis during the construction period and continued on an annual basis for the first five years of the Project development cycle. If levels of PIIM are both stable and manageable after five years, the period between monitoring cycles will be extended to two years. Monitoring of population settlements will take place principally in Hamad Ela, Berahale, Ambule, Serdo, and any villages that develop in proximity to Project infrastructure (although this will be discouraged through measures discussed later in this management plan).

The purpose of monitoring is to identify any issues related to the rate, scale and social characteristics of PIIM. Monitoring activities will include:

- The analysis of available aerial / satellite photography to assess the expansion of settlements within the SSA.

- The collection of high quality wide-angle digital photographs of settlements from the same vantage point at regular intervals. These can provide information on the rate and scale of settlement expansion and can be used as particularly compelling evidence to demonstrate changing settlement trends.

- Interviews with local authorities and traditional leaders, which are based on a standard interview guideline, to gauge changing perceptions of new migration patterns. These interviews will also include local authorities and other local stakeholders in the area of health, education, and local community infrastructure.

- A six monthly (construction) or annual (during operations for the first five years, periodically thereafter as necessary) household survey of all settlements that have been identified as potential in-migration hotspots (Serdo, Hamad Ela, Berahale, Ambule, Bada and any other village in close proximity to the Project Area). Another village will be selected on the basis of its distance from the Project (a settlement not directly impacted by PIIM). This final village will serve principally as a 'control group' for the purpose of analysing changing dynamics related to in-migration in potential in-migration hotspots. It will also help to monitor for any unanticipated forms of in-migration. Households will be sampled randomly and samples will be large enough to be representative of their communities. Since the aim of the survey is to measure changing rates of in-migration, the sample will not discriminate between migrant and local households. The survey will be standardised and replicated over each monitoring cycle to enable meaningful comparison of data. The survey will not be long or elaborate and will include questions that cover the issues in presented in *Box 4.1.*

Box 4.1   *Topics to be covered by the Survey*

- Household status (i.e. local or in-migrant);
- The duration the household has been living in the village;
- Basic socio-economic indicators (e.g. employment levels, housing quality and status, dependency on food aid, school attendance rates, basic health indicators);
- Perceptions of changing dynamics of in-migration;
- Experiences of positive impacts of in-migration;
- Experiences of negative impacts of in-migration; and
- Household access to services including health, education, housing and water/sanitation.

- The household survey developed as part of the ESIA social baseline (refer to Volume II *Annex B*) can be used as a starting point for comparison.

- Conduct selected semi-structured interviews with both migrant and established local residents to identify any potential conflict-related issues that may be related to PIIM. These enquiries will be based on a systematic questionnaire guideline to be able to compare data over time.

Stakeholder Engagement

An important part of in-migration management is active engagement of stakeholders; these include local and regional Government as well as local communities. The purpose of engaging the Government is to discuss issues, risks, and opportunities linked to in-migration. Local communities will be

engaged to understand their concerns, raise awareness of risks and opportunities, and identify solutions to issues relating to in-migration.

For effective stakeholder engagement, Yara Dallol BV will develop and implement a targeted communications plan for areas known to be potential sources of in-migration and, using migrant networks, inform potential in-migrants of the scale and nature of opportunities, manage their expectations, and where appropriate discourage them from moving to the SSA.

Strengthening Government Capacity

The PIIM Plan will provide guidance in terms of how the Project will support local Government's capacity to manage in-migration. This will include:

- Implement an integrated capacity building programme to provide opportunities for local authorities and village communities to plan, prioritise, build and maintain necessary infrastructure.

- Provide technical support to relevant Government authorities with the aim of assisting them in effectively administering land development and land use changes as appropriate.

- Provide support for the establishment and operation of In-Migration Committees in settlements identified to be at high risk from in-migration. These committees will take part in promoting spatial planning, monitoring in-migration, identifying arising issues, and promoting good relations between local people and in-migrants.

- Work with local authorities and village leaders to actively manage in-migration and its impacts, particularly through registering newcomers and directing them to appropriate accommodation options.

Spatial Planning, Administration and Resource Allocation

In order to avoid a proliferation of unplanned construction, intended to meet the demand from new in-migrants Yara Dallol BV will work directly with local authorities (traditional and formal) to anticipate and support settlement expansion that occurs as a consequence of Project development. It is important that this planning occurs prior to the realisation of in-migration.

The orderly expansion of infrastructure, services and utilities will require Government support and authorization, while the 'zoning' of areas for housing and commercial activities will require the involvement of the traditional leadership. Such planning will lead to a more orderly integration of in-migrants and the generation of more sustainable communities.

Yara Dallol BV will work directly with local authorities and community leaders in Serdo, Hamad Ela, Bada, Berahale and Ambule to enable planned settlement expansion and associated necessary improvements to public

infrastructure, such as water supply and sanitation, improvements to health services and better access to educational facilities. This will involve the development of agreed areas suitable for in-migrants and engagement with Government to discuss requirements for targeting infrastructure and services.

In addition Yara Dallol BV will work with local leaders to agree buffer zones around camps and infrastructure where settlement will be controlled and settlers directed to areas zoned to manage new migrants.

Planning Development along Transport Corridor and Routes

The potential for new settlements to develop along newly constructed roads and areas earmarked for halfway houses (in Serdo and Port of Tadjoura in Djibouti) are likely to attract migrants to these areas. In addition, the upgrading of the Government road between Mekele and Bada that is currently being constructed has already been reported to have improved mobility of the local and existing migrant population.

Yara Dallol BV will seek to ensure, where possible, that settlement development along new roads occurs in a planned, safe and sustainable manner through liaison with and provision of support to the federal Government and other related ministries. Ideally this would be facilitated by engagement with federal and regional Government and local and traditional authorities surrounding the development of settlements at the road side.

It should however be recognised that Yara Dallol BV do not have remit to influence the design of the Mekele to Bada road and cannot independently or entirely influence or control new settlements that are developed. This process will require on-going engagement with relevant stakeholders to collectively manage any settlements that develop at the road side. It should be noted that new settlement development may be driven, not by in-migrants, but by local communities seeking to relocate to less isolated sites that have easier access to the potential benefits of improved forms of social and economic connection to larger centres.

Promote Regional Diversified Growth Opportunities

Recognising that the development of the ANRS and Ethiopia is the responsibility of the federal and regional Government it will also benefit Yara Dallol BV to promote 'hubs' of regional development away from their Project Area to direct PIIM towards other areas. One of the most effective ways of managing the risks and impacts associated with PIIM is to avoid the development of new concentrations of resources and opportunities around the Project infrastructure. This can be done by supporting alternative economic opportunities that are more distant from the SSA and the identified in-migration hotspots. This will involve liaison with regional development stakeholders including the federal and regional Government, relevant NGOs and civil society. As part of on-going community development planning Yara

Dallol BV will consider how and the extent to which it is possible to support development initiatives that may promote regional diversified growth.

The IFC in their guidance note on PIIM specifies that in such circumstances the companies contributing to in-migration must support its management and the development of regional diversified growth opportunities is one of their recommended approaches:

"*A project may support the development and implementation of regional growth strategies that create alternative economic opportunities distant from the project area of influence, thereby ensuring that the project does not become the sole locus of economic development and attraction. Development of such strategies requires the participation and support of many stakeholders, including national, regional, and local Government, the private sector, civil society, and communities, and typically involves long lead times.*"

This will require early implementation, during the construction phase, before new patterns of in-migration become established, and potentially act as pull factors themselves. This strategy also requires a strong commitment of resources and extensive engagement with a broad range of stakeholders in order to be implemented effectively.

Promoting diversified regional economic growth may be an effective strategy for dispersing the points of attraction for in-migration. The use of this strategy should consider the extent to which such interventions create new incentives for increasing the overall rate and scale of PIIM. The adoption of an approach that seeks to disperse local economic opportunities should therefore be monitored carefully for any unintended consequences.

Recruitment Policy and Management

Yara Dallol BV's approach to recruitment of labour may be one of the most effective tools for managing potential in-migration. This is discussed in greater detail in the Sourcing, Recruitment and Procurement Management Plan (refer to *Annex L* in *Part III* of this ESIA).

Some of the recognised strategies to manage in-migration through recruitment planning include:

- Prioritizing the recruitment of labour, particularly for temporary contracts, from candidates who are identified as 'local' to the SSA. This is intended to reduce the incentive of outsiders to move to the area in search of income generating opportunities. This may require an extensive and on-going effort to communicate clear recruitment policies and the rationale behind these. Importantly, these policies that define and favour 'local' entitlements to employment opportunities need to be developed in close consultation with local traditional authorities and Government officials, in order to ensure that they enjoy widespread legitimacy. These policies should also extend to contractors and labour-recruiters if they are to be effective.

- Communicate the Project's policy of recruiting through Local Employment Offices and the locations of those offices through activities targeted at potential in-migrants. This limits the incentive for work-seekers to settle at the gate of the Project in hope of picking up opportunities for casual labour. It also encourages recent in-migrants to reside in areas where their settlement is anticipated and planned for. At present it appears that Berahale and Adokuwa represents the most appropriate centre for conducting labour recruitment. Labour recruitment operations should be established with a view to identifying and managing any locally specific impacts or issues that arise.

- An expatriate workforce may generate a local market for casual labour, potentially contributing to migration into the area. This may include demand for informal services and goods. In response to this Yara Dallol BV will enforce a closed camp for all employees restricting movements during off-duty hours for all workers to surrounding settlements.

- The provision of transport to workers from more concentrated centres that are better able to cope with the influx of in-migrants, may have a significant impact on reducing in-migration settlement in potential 'hotspots' located close to the Project Area, such as Bada, and Hamad Ela. If workers are able (and encouraged through the provision of transportation services) to live in more developed settlements like Berahale, the Project workforce will have a much lower negative impact on settlements close to the Project Area (like Bada, Hamad Ela and Ambule).

4.3   MANAGEMENT DURING OPERATIONS

4.3.1   Impacts

In spite of implementing management measures within the construction phase some degree of PIIM is possible and likely. In the event that PIIM does occur the impacts during operation will be similar to those identified in *Section 4.1.1*.

If the mitigation measures outlined in *Section 4.3.3* are implemented, it is anticipated that the impacts which occur during operations may be less significant than during the construction phase. This will be due to an increase in the absorptive capacity of potential 'host' communities for in-migration and the reduction in the rate of in-migration into the area. It should be noted that even if the measures outlined in *Section 4.3.3* are implemented fully, some in-migration is expected to continue during the operations phase, which continue to cause some impacts.

4.3.2 *Objectives and Targets*

The objectives of the IMMP in managing the identified impacts during operations are established in *Section 1.1.2*. This identifies the specific targets and management measures associated with this phase of the project lifecycle.

4.3.3 *Management Actions*

The following sections describe the management actions required to mitigate the PIIM that is anticipated to occur during the operations phase. This focusses on an approach that delivers:

- The effective delivery of Project benefits to local 'host communities';
- Strengthening of Project and local governance capacity; and
- Directly addressing negative impacts of in-migration.

Strengthening of Project and Local Governance Capacity

In response to PIIM Yara Dallol BV will ensure that adequate systems are in place to manage stakeholder engagement, monitoring, evaluation and community development. This will be managed through the ES–MS and the measures detailed to ensure that adequate skills and competencies are in place. In addition Yara Dallol BV will work with the traditional and formal Government networks to grow capacity in the areas of planning and infrastructure development based on skills and experience and partnership projects.

Direct Mitigation of Impacts of In-Migration

The anticipated occurrence on in-migration will have specific environmental and social impacts (refer to *Section 4.1.1*). As a result Yara Dallol BV will develop mitigation measures that address specific impacts; these may include infrastructure improvements (e.g. water sanitation and health infrastructure etc.).

Key to the management of potential conflict driven by in-migration will be working with the traditional governance network and the relevant Kebele or Woreda Government to promote conflict resolution programmes through a consultation process, including sponsoring discussion between different communities where necessary. In addition Yara Dallol BV will support the organisation / organise a series of cultural activities to help strengthen Afar culture and encourage current social ties and networks.

It is not possible to identify all of the specific appropriate interventions that may be required to manage PIIM related impact at this stage. Some of the impacts identified, which will have an effect on in-migration may be avoided, through planning and pre-emptive investment that reduces the potential for undesirable forms of in-migration to occur. Through intensive monitoring and stakeholder engagement, the Project will be able to identity negative impacts promptly and address these before their effects can escalate.

Section 7 provides an outline of some of the basic mitigation measures that may help to mitigate any PIIM related impacts.

4.4 MANAGEMENT DURING DECOMMISSIONING AND CLOSURE

4.4.1 Impacts

During the decommissioning and closure phases it is anticipated that PIIM will have halted as the draw of economic opportunities has ceased.

Some of the impacts related to PIIM (identified in *Section 4.1.1*) may however continue to be experienced.

4.4.2 Objectives and Targets

The objectives of the IMMP in managing the identified impacts during decommissioning and closure are established in *Section 1.1.2. Section 7* identifies the specific targets and management measures associated with this phase of the project lifecycle.

4.4.3 Management Actions

The management actions required to mitigate impacts related to PIIM have been described in previous sections.

5   *VERIFICATION AND MONITORING*

5.1   O*VERVIEW*

In order to verify the management measures, Yara Dallol BV will require several monitoring systems as part of its overall Environmental and Social Management System (ES-MS). These will include the following:

- **In-Migration Database** – this will track the results of PIIM monitoring including aerial / satellite imagery, wide-angle photographs of settlements, interview responses with traditional leaders, local residents and local stakeholders in the area of health, education, and local community infrastructure, food prices, signage developed, zoning maps, and household survey results.

- **Stakeholder Engagement Database** – this will be used to track and record the dates, minutes and attendance at engagement activities. In addition the database will be used to log relevant stakeholders and contact details.

- **Community Feedback and Grievance Mechanism** – this will log all grievances, issues and concerns raised during engagement sessions. The system will also include areas to record information on measures to address issues, timeframes, personnel responsible and any subsequent feedback that is required.

- **Community Development Funding Database** – this will log all funding or support given to partner organisation, NGOs etc. This will include numbers of potential beneficiaries, amount funded, and beneficiary feedback.

- **Worker Transport –** this will be controlled through the use of (for example) ID/access card to board the bus.

5.2   C*OMMUNITY* C*OMPLAINTS*

Community complaints and concerns will be captured and addressed through Yara Dallol BV's External Feedback and Grievance Mechanism (refer to *Annex C* in *Part II* of this ESIA). The procedure has been designed to meet the requirements of the IFC in relation to Performance Standards 1, 5 and 7 and aims to provide a simple, fair and transparent process for all external parties to provide feedback and to raise grievances.

6 REPORTING AND DOCUMENTATION

6.1 GOVERNMENT/AUTHORITY REPORTING

Yara Dallol BV will comply with any Ethiopian Government reporting requirements relating to in-migration management.

6.2 INTERNAL REPORTING

Yara Dallol BV will develop an internal reporting programme relating to in-migration management. Internal in-migration management reports will be published at least annually.

6.3 COMMUNITY REPORTING

On the basis of annual internal reporting, a summary report suitable for digestion by a non-technical community audience will be developed and disclosed on an annual basis. This report will focus upon graphical representation of information, and in particular outcomes of any community complaints and those actions taken to remedy significant impacts. This will be undertaken in non-technical languages and in suitable local languages in a culturally appropriate manner.

Table 7.1   Management Measures for Construction, Operation, Decommissioning and Closure

Phase						
Construction	Operation	Decommissioning and Closure	Objective	Mitigation/Management Measures	Monitoring Plan	Responsibility
IN-MIGRATION PLAN						
✓	✓	✓	Develop and implement a PIIM Plan for the management of in-migration into identified hotspots.	Develop and implement a PIIM Management Plan. The Plan will cover the following key elements: • Communication; • Engagement at a local / regional level; • Minimising potential for in-migration; • Managing and directing influx; • Enhancing physical infrastructure; • Building human capacity to manage influx; • Monitoring and evaluation of in-migration; and • Consideration of Project closure.	• Presence of an PIIM management plan • Implementation of the PIIM Plan	• Environmental and Social Manager • Community Liaison Officer
MONITORING IN-MIGRATION						
✓	✓	✓	Monitor the rate of expansion in migrant hotspots in order to understand the rate of in-migration.	• Analysis of aerial / satellite imagery of the local settlements in order to assess their expansion. This assessment will focus on the settlements of Serdo, Bada, Hamad Ela, and Berahale. • Administer household survey for the purpose of analysing changing dynamics related to in-migration in potential hotspots. The targeted settlements should include the identified in-migration hotspot (such as Serdo, Bada, Hamad Ela, and Berahale) and select one village that is not expected to experience in-migration as part of the survey to be a control group. • Administer semi-structured questionnaire designed to evaluate perceptions of migration patterns in the hotspot villages. Interviews will be conducted with local and traditional leaders as well as local stakeholders in the area of health, education, and local community infrastructure. • Administer a semi-structured questionnaire to local and migrants specifically designed to monitor potential PIIM-related conflict.	• Database of historical aerial / satellite photography compiled and updated • Inclusion of summary of analysis in internal reports • Database of photo-log • Inclusion of summary of analysis in internal report • Database of interview notes	• Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Monitor changes in basic goods price in order understand the rate of inflation.	Monitor food prices through the review of the changing cost of a standardised basket of goods.	• Database of price fluctuations • Inclusion of summary of analysis in internal reports every 3 months	• Environmental and Social Manager • Community Liaison Officer
STAKEHOLDER ENGAGEMENT						
✓	✓	✓	Develop and implement a detailed stakeholder engagement plan aimed at government/ traditional leaders and communities focused on communicating the risks associated with in-migration.	• Develop a detailed engagement plan and schedule related to informing stakeholders of increases in workforce and potential for influx. • Engage with Government authorities on issues, risks, and opportunities regarding in-migration. • Engage with local communities to understand their concerns, raise awareness of risks and opportunities, and identify solutions to issues relating to in-migration. • Engage local formal and traditional authorities around the development of new settlements along the access routes to site. • Develop a feedback and grievance mechanism to collect any feedback or grievances related to in-migration.	• Records of engagement undertaken • Stakeholder engagement minutes • Database of feedback and grievances • Presence of a feedback and grievance mechanism that is clearly documented • Feedback and grievances accepted and responded to within targeted timeframe	• Environmental and Social Manager • Community Liaison Officer

Phase			Objective	Mitigation/Management Measures	Monitoring Plan	Responsibility
Construction	Operation	Decommissioning and Closure				
✓	✓		Engage with the communities in in-migration feeder areas about the nature of Project opportunities, in order to discourage them from moving to the SSA.	Develop and implement a targeted communications plan in areas known to be potential sources of in-migration.	• Presence of target communication plan • Records of engagement undertaken • Stakeholder engagement minutes	• Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Engage with other mining companies in the SSA to align approaches to in-migration management and seek efficiencies.	Develop an In-Migration Management Forum comprised of the various mining companies in the area with the aim of developing a collaborative and integrated approach to monitoring, controlling, and managing in-migration.	• Engagement records with other mining companies • Presence of In-Migration Management Forum • Presence of an integrated in-migration management strategy/plan	• Dallol General Manager • Environmental and Social Manager • Community Liaison Officer
				RECRUITMENT		
✓	✓		Minimise influx of job seekers to the SSA through clear communication of employment opportunities and human resources procedures.	In addition to mitigation measures in Sourcing, Recruitment and Procurement Management Plan (*Annex L* in *Part III* of this ESIA). Implement the following: • Plan recruitment and procurement to boost local benefits and avoid the in-migration of opportunistic in-migrants. Implement employment policy forbidding informal labour hire. • Deploy signage in relevant local languages related to Yara Dallol BV hiring in relevant locations (away from areas identified to be sensitive to in-migration). • Engage new migrants' close to Yara Dallol BV worksites in a timely manner about Yara Dallol BV's hiring policies.	• Refer to Sourcing, Recruitment and Procurement Management Plan (*Annex L* in *Part III* of this ESIA) • Number of signs erected and languages used on signs • Proof of engagement with migrants close to the Site	• Human Resources Manager • Environmental and Social Manager • Community Liaison Officer
				SPATIAL PLANNING AND PUBLIC SERVICES DELIVERY		
✓	✓		Ensure appropriate spatial planning (and public services delivery) is undertaken in the migration hotspots.	• Engage local and traditional authorities to support the anticipated expansion of Serdo, Bada, Berahale, Hamad Ela, and Ambule. • Engage local and traditional authorities regarding the provision of public infrastructure into in-migration hotspots. • Agree 'zoned' areas of these villages for housing and commercial activity to help manage expansion.	• Engagement records with traditional leaders to discuss approach to in-migration and Project buffers • Record zoned areas in maps • Numbers of areas demarcated in relevant settlements • Demarcate relevant areas.	• Environmental and Social Manager • Community Liaison Officer
✓	✓		Collaborate with local partners and government to provide education and awareness programmes focused on diseases and health practices related to sanitation and hygiene.	Develop information, education and communication campaigns around diseases and health practices related to sanitation and hygiene.	• Presence of Education Health and Awareness Programmes • Record of engagements • Present of programme materials	• Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Ensure provision of potable water to all communities who will be impacted by Project related abstraction activities worsened by in-migration.	Ensure adequate potable water provision through the implementation of measures in *Annex J of Part III* of this ESIA (Community Health, safety and Security Management Plan) and *Annex H of Part III* of this ESIA (Water Management Plan).	• Refer to *Annex J of Part III* (Community Health, safety and Security Management Plan) and Annex *H of Part III* (Water Management Plan)	• Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	To limit / avoid encroachment on Yara Dallol BV owned land by in-migrants	Develop buffer zones around Yara Dallol BV infrastructure, including worker accommodation. Develop culturally appropriate signage, in partnership with local government inside buffers directing new arrivals to areas planned for new development.	• Record zoned areas in maps • Engagement records with traditional leaders to discuss approach to in-migration and Project buffers • Engagement records with inhabitants of new settlements within buffers	• Security Manager • Environmental and Social Manager • Community Liaison Officer

Phase			Objective	Mitigation/Management Measures	Monitoring Plan	Responsibility
Construction	Operation	Decommissioning and Closure				
✓	✓	✓	Ensure that migrants settle in areas designated for (future) settlement developments.	Engage with the inhabitants of any new illegal settlement (in partnership with formal and traditional government) to redirect them to areas planned for development. This will not include the intimidation, eviction or movement of settlers but the negotiated suggestion of preferable areas to settle, with no consequences should settlers not move.	• Engagement records with traditional leaders to discuss approach to in- migration • Engagement records with inhabitants of new settlements • Numbers of signs places directing new arrivals to other areas	• Environmental and Social Manager • Community Liaison Officer
			GOVERNMENT CAPACITY BUILDING			
✓	✓		Develop and implement an integrated capacity building programme designed to empower local /and regional government to manage in-migration.	• Provide technical support to relevant government authorities with the aim of assisting them in effectively administering land development and land use changes as appropriate. • Provide support for the establishment and operation of In-Migration Committees in settlements identified to be at high risk from in-migration. These committees will take part in promoting spatial planning, monitoring in-migration, identifying arising issues, and promoting good relations between local people and in-migrants. • Work with local authorities and village leaders to actively manage in-migration and its impacts, particularly through registering newcomers and directing them to appropriate accommodation options. • Provide opportunities for local authorities and village communities to plan, prioritise, build and maintain necessary infrastructure.	• Presence of capacity building programme • Presence of course materials • Record of training and development activities • Record of government officials in attendance • Record of engagements with communities • Qualitative feedback from beneficiaries	• Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Promote regional diversified growth opportunities in order to draw in-migration away from the SSA.	In collaboration with the government, source funding from international donors to support alternative economic opportunities away from the SSA. This will be achieved through the creation of economic development programs in other areas of the Afar Region, away from the SSA.	• Funding (or other support) awarded to partner organisations (NGOs or other) with economic development programs in other areas of the Afar Region • Positive qualitative feedback from beneficiaries of these programs • Progress reports from these programs indicating outcomes and impact	• Dallol General Manager • Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Develop relationship with food aid providers in order to increase efficiency of response to emergency food shortages.	Refer to *Annex J* of *Part III* (Community Health, safety and Security Management Plan).	• Refer to *Annex J* of *Part III* (Community Health, safety and Security Management Plan)	• Refer to Annex J of Part III (Community Health, safety and Security Management Plan)
			CULTURAL HERITAGE			
✓	✓	✓	Promote traditional conflict resolution methods where appropriate.	Work with the traditional governance network and the relevant Kebele or Woreda government to promote traditional conflict resolution programmes through a consultation process, including sponsoring discussion between different communities where necessary.	• Engagement records of cases resolved with the assistance of formal and traditional leaders • Records on incidence of conflict	• Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Ensure the continued utilisation of traditional governance to address key stakeholder issues and concerns linked to the proposed Project.	Include traditional governance networks within stakeholder engagement activities in the SSA. Specific forums for women, youth and the elderly will be established to ensure that their opinions and views are considered.	• Engagement records showing the utilisation of formal and traditional leaders • Presence of multiple engagement forums • Records of programmes supported	• Environmental and Social Manager • Community Liaison Officer

Phase			Objective	Mitigation/Management Measures	Monitoring Plan	Responsibility
Construction	Operation	Decommissioning and Closure				
✓	✓	✓	Support the organisation / organise a series of cultural activities to help strengthen Afar culture and encourage the current social ties and networks.	• Support the annual cultural festival and competition held at the regional level by sponsoring or collaborating with the regional Bureau of Culture and Tourism. Such support and the form in which it is provided should be discussed and agreed with communities involved, to ensure that it reflects their preferences. • Attend key cultural/ traditional festivities and celebrations to which they are invited. • Support projects / educational programmes in local schools on Afar culture and identity aimed particularly at the youth in collaboration with the Woreda Sports and Cultural office in such programmes. • Work with local leaders and community groups to support integrated youth programmes related to sport, arts and culture seeking to build bonds and coordination between different ethnic groups. Funding may be presented as grants, sponsorship or through partnership with relevant organisations.	• Records of grants issued and programmes supported • Record of number of cultural events invited to and attended by Yara Dallol BV representatives per annum • Qualitative feedback from beneficiaries • Engagement records with youth groups and local surrounding priority areas for investment	• Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Develop suitable archaeological mitigation measures to prevent impacts to cultural heritage from in-migrants.	Refer to *Annex I* of *Part III* (Cultural Heritage Management Plan).	Refer to *Annex I* of *Part III* (Cultural Heritage Management Plan).	• Refer to *Annex I* of *Part III* (Cultural Heritage Management Plan).
			WORKFORCE MANAGEMENT			
✓	✓	✓	Ensure that the Yara Dallol BV in-migrant workforce (including contractors) respects the cultural heritage of the Afar.	Develop and implement an induction programme. The induction programme will include a section on the Afar culture and heritage. The programme will increase in-migrants' sensitivity to local norms and customs of the Afar and will ensure that contractors and employees are aware of appropriate and acceptable behaviours.	• Presence of Induction programmes • Presence of induction materials • Record of people who attended the induction	• Human Resources Manager • Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Develop and implement a camp management policy in order to limit in-migrant workforce interaction with local population.	Develop a camp management policy stating and ensuring that the operations camp is a closed camp. This will prohibit unauthorised visitors and mean all employees are restricted to camp during off-duty hours. This will be supported by appropriate engagement with workforce, signage and security / sign-in /out procedures.	• Presence of camp management policy stating closed camp • Security records of workforce sign-in/out	• Security Manager • Environmental and Social Manager • Community Liaison Officer
✓	✓	✓	Develop measures to screen and test worker health to manage potential health impact related to community-worker force interactions (which may be worsened by in-migration).	Refer to *Annex J* in *Part III* (Community Health, safety and Security Management Plan); and *Annex M* in *Part III* (Worker Management Plan).	Refer to *Annex J* in *Part III* (Community Health, safety and Security Management Plan); and *Annex M* in *Part III* (Worker Management Plan).	• Environmental and Social Manager • Community Liaison Officer On-site Medical Officer • Health and Safety Manager