

This ESIA has identified impacts (both positive and negative) to the physical, natural and socio-economic environments, as well as to community and worker health. In order to avoid, minimise and reduce negative impacts, and to ensure opportunities for the enhancement of positive impacts are realised, Environmental and Social Management Plans (Management Plans) have been prepared. The full list of Management Plans is provided in *Part III* of the overall ESIA document and is outlined in *Box 13.1*.

Box 13.1 *List of Environmental and Social Management Plans*

<u>Part III: Environmental Social and Management Plans</u>
<i>Annex A: Air Quality Management Plan</i>
<i>Annex B: Noise Management Plan</i>
<i>Annex C: Biodiversity Management Plan</i>
<i>Annex D: Emergency Response Plan</i>
<i>Annex E: Integrated Mine Closure Plan</i>
<i>Annex F: Spill Prevention, Control and Containment Plan</i>
<i>Annex G: Waste Management Plan</i>
<i>Annex H: Water Management Plan</i>
<i>Annex I: Cultural Heritage Management Plan</i>
<i>Annex J: Community Health, Safety and Security Management Plan</i>
<i>Annex K: In-migration Management Plan</i>
<i>Annex L: Sourcing, Procurement and Recruitment Management Plan</i>
<i>Annex M: Worker Management Plan</i>

Each management plan listed above provides the following:

- The objectives and purpose of the plan;
- The association of the plan with other social and environmental plans;
- A summary of the legal requirements and standards relevant to the plan;
- An overview of the overall accountability and responsibility for the plan;
- A summary of how impacts management should be implemented;
- Mitigation measures (actions) for during various Project phases (*viz.* construction, operational and decommissioning phase);
- Monitoring requirements, including targets, performance indicators and reporting requirements; and
- A management plan summary together with resources required and responsibilities for implementation.

As is described in *Chapter 5*, Yara Dallol BV has updated their social management procedures associated with the proposed Project. These procedures include –

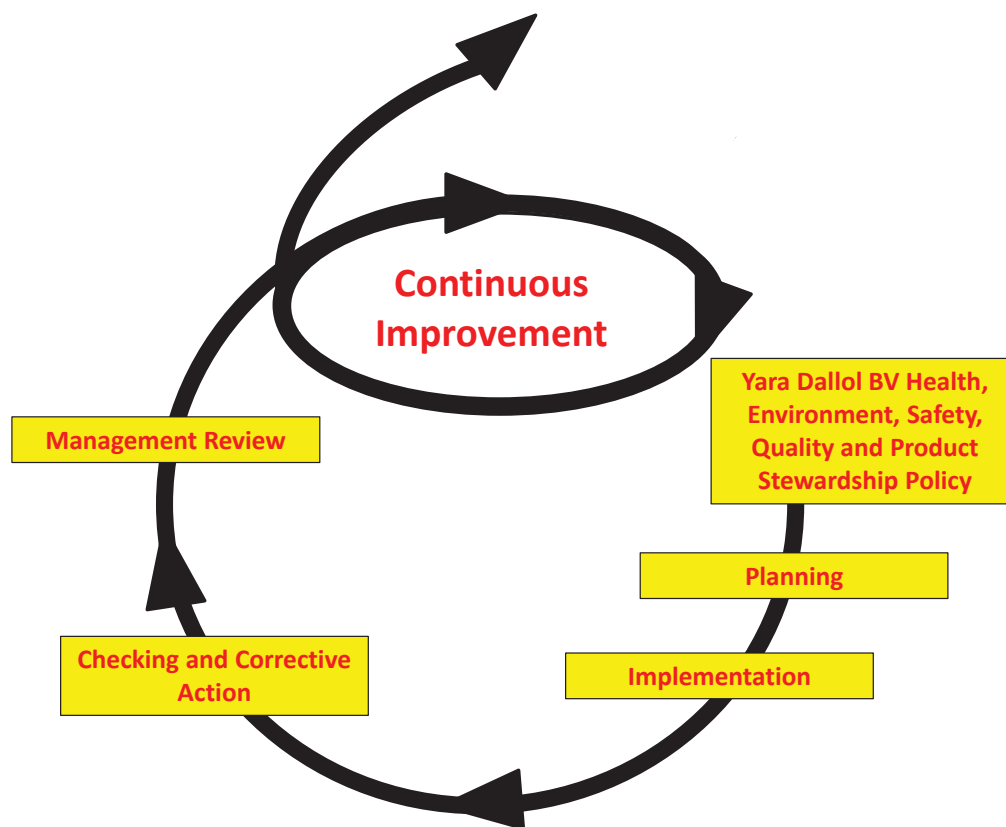
- Security Management Procedure;
- Contractor Management Procedure;
- Social Feedback and Grievance Procedure; and
- Labour and Working Conditions Procedure.

These procedures were taken into account during the development of the social Management Plans and the Stakeholder Engagement Programme (which provides commitments for ongoing stakeholder engagement post-ESIA). Details of these procedures are provided in *Chapter 5*.

To provide a *vehicle* for the *integrated* management of all the Management Plans listed in *Box 13.1*, an Environmental and Social Management System (ES-MS) will be implemented. In this regard, the ES-MS is a key component of this ESIA. The main elements of an ES-MS are provided in *Figure 13.1* and comprise the following four phases.

<u>Planning:</u>	Establishing the <i>objectives</i> and processes necessary to deliver results in accordance with the Yara Dallol BV Health, Environment, Safety, Quality and Product Stewardship Policy.
<u>Doing:</u>	Implementing the processes through defining <i>mitigation</i> measures and assigning <i>responsibilities</i> for undertaking or implementing such mitigation measures.
<u>Checking:</u>	<i>Monitoring</i> and <i>measuring</i> these processes against the policy, objectives and targets, legal and other requirements (such as those of the IFC), and <i>reporting</i> of the results.
<u>Acting:</u>	Taking actions to continually improve performance of the ES-MS through the <i>training</i> of personnel and <i>auditing</i> of results.

Figure 13.1 Elements of an Environmental and Social Management System (after ISO14001:2004)



The ESIA process has essentially undertaken most of the initial *planning* aspects required by an ES-MS by identifying environmental and social impacts and formulating Management Plans. Further elements of an ES-MS related to *planning* and those related to *doing*, *checking* and *acting*, are described in this *Chapter* under the following sections:

- **Planning:** *Section 13.1* provides the Yara Dallol BV Health, Environment, Safety, Quality and Product Stewardship Policy statement as well as specific strategies aimed at meeting these policy commitments.
- **Planning/Doing:** *Section 13.2* provides an overview of the Environmental and Social Management Plans.
- **Planning/Doing:** *Section 13.3* and *13.4* provides the institutional framework, organisational frameworks and specific roles and responsibilities for implementing the ES-MS.
- **Planning/Doing:** *Section 13.5* outlines plans for on-going stakeholder engagement including the management of community grievances and concerns.

- **Checking / Acting:** *Section 13.6* introduces key components for the implementation of the ES-MS including training, monitoring, audits and inspections, and reporting.
- **Acting:** *Section 13.6* introduces key components for the implementation of the ES-MS; *Section 13.6.5* explains the system for the management of change during the implementation of the proposed Project.

An ES-MS is therefore implemented to:

- Assist management in establishing priorities for environmental and social impacts;
- Provide a mechanism for ensuring that measures identified in the ESIA and listed in each management plan, are implemented;
- Ensure that changes in Ethiopian legislation and/or Yara Dallol BV policies and procedures (corporate or site level) are tracked and adhered to at all times;
- Provide a framework for compliance auditing and inspection programmes;
- Ensure environmental and social (including Project induced health issues) continue to be integrated into business decisions;
- Provide a framework for mitigating impacts that may be unforeseen or unidentified until construction or operation is underway;
- Encourage and achieve appropriate environmental and social performance and awareness from all employees and contractors;
- Provide assurance to regulators, stakeholders and lenders that their requirements with respect to environmental and social performance are being managed; and
- Provides the opportunity to certify the system to international standards, such as ISO 14001.

13.1

YARA DALLOL BV: VISION, POLICY AND STRATEGIES

The development of the ES-MS has been guided by the overall Yara Dallol BV Health, Environment, Safety, Quality and Product Stewardship Policy. This Policy is a high-level corporate statement of intent and establishes the principles to be followed in the management of environmental and social issues. The policies therefore constitute the documents against which all related activities should be judged.

13.1.1

Yara Dallol BV's Vision

The vision of Yara Dallol BV is as follows –

YARA DALLOL BV's VISION

To be an **Industry Shaper**, aiming to set industry standards and be a positive force, developing the industry through performance and growth. Our mission is to strive for better yield, delivering good returns for farmers, industrial customers, our owners and society at large.

We are committed to fostering an inspiring and innovative performance culture, based on our vision and mission, Code of Conduct, Ethics Program, and four core values: ambition, teamwork, trust, accountability.

Furthermore, as part of Yara, Yara Dallol BV has established a *Leadership Agenda*, which has been developed to support the company's strategic ambitions. The *Leadership Agenda* focuses on five areas in which the company needs to focus in order to realize its *Industry Shaper Vision*, including –

YARA DALLOL BV's FIVE LEADERSHIP AGENDA ITEMS

- To continuously drive profitable growth
- To be a leading enterprise in global agricultural development
- To drive strong performance and positioning on environmental solutions
- To perfect operations throughout the organization
- To ensure a company-wide focus on best practice corporate governance.

This ESIA and ES-MS aims to meet these Agenda items, and to provide the framework for which environmental solutions and good practice can be implemented and solutions sought for continual improvement during ongoing operations.

This high level commitment is also reflected in Yara Dallol BV's Health, Safety, Quality and Product Stewardship Policy, provided below.

13.1.2

Yara Dallol BV Health, Environment, Safety, Quality and Product Stewardship Policy

Yara Dallol BV's Health, Environment, Safety, Quality and Product Stewardship Policy (with reference to applicable environmental and social stewardship) is as follows –

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, their commitment to continuously improve and reach standards of excellence in Health Environment, Safety, Quality and Product Stewardship through their operations.

ENVIRONMENTAL POLICY

Yara Dallol BV will manage their business in a life cycle perspective. In Yara Dallol BV's operations the company will contribute to eco-efficiency by continuously improving energy consumption and reducing waste, emissions and discharges. Where waste is generated, it will be handled and disposed of safely and responsibly.

Yara Dallol BV will design their 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 their 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.

CLIMATE CHANGE

Yara Dallol BV will be a leader in their industry on lowest greenhouse gas emissions, with emphasis on energy efficient operations and the development and use of technology and services for reducing emissions in production and application of their products.

MANAGEMENT AND EMPLOYEE COMMITMENT

The Board of Directors (of Yara Dallol BV) will be informed about pertinent safety, health, environmental and product stewardship issues and will ensure that policies and steering documents are in place and actions taken to achieve this Commitment.

Management in each business area is responsible to educate, train and motivate employees to understand and comply with the Commitment and applicable laws.

The management plans and this ES-MS should support the commitments made in the Yara Dallol BV Vision, Health, Environment, Safety, Quality and Product Stewardship Policy ⁽¹⁾. This hierarchy of commitments is indicated in *Figure 13.2*.

(1) In each Management Plan, reference is made to the applicable clause in the HSEQ Policy

Figure 13.2 ES-MS Hierarchy of Commitments



13.2 OVERVIEW OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS

13.2.1 Purpose of the Environmental and Social Management Plans

During the course of the ESIA process, Project design decisions have been made, taking into account the need to firstly avoid, minimise and reduce negative environmental, socio-economic and health impacts, and the opportunity to enhance positive impacts.

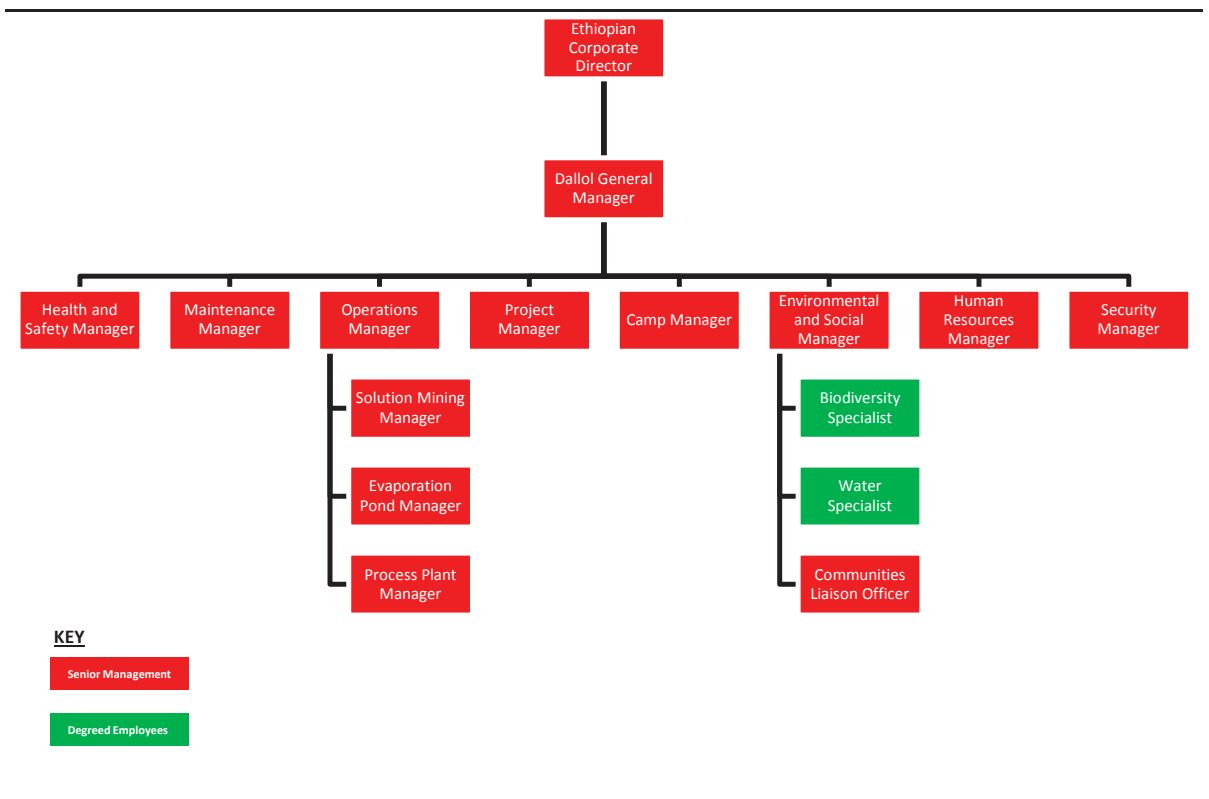
To ensure that identified and unforeseen or unidentified impacts are detected and resolved, a set of environmental and social Management Plans have been developed. The Management Plans will be supplemented with additional requirements as detailed design proceeds and as contractors are selected. Contractors will be required to develop their working methods and procedures in accordance with these Management Plans.

The Management Plans are an integral part of the ES-MS and act as the main vehicle for converting the Vision and Policy into action.

13.3 INSTITUTIONAL FRAMEWORK

To *implement* the Management Plans, roles and responsibilities for implementation need to be defined. These roles and responsibilities are presented in Figure 13.3, and roles and responsibilities are discussed at a high level in Section 13.4.

Figure 13.3 Anticipated Corporate Structure associated with the Proposed Yara Dallol Potash Project



The successful implementation of the ES-MS requires a commitment from Yara Dallol BV as well as their employees and contractors. Within these structures, roles and responsibilities for the implementation of the Management Plans need to be defined within the following functions:

- Dallol General Manager;
- Health and Safety Manager;
- Operations Manager;
- Project Manager;
- Environmental and Social Manager:
 - Biodiversity Specialist;
 - Water Specialist; and
 - Community Liaison Officer.
- Human Resource Manager; and
- Security Manager.

Similarly specific roles and responsibilities need to be defined for contractors. During construction, and to a lesser extent operations, contractors will be the key implementers of mitigation measures as defined in Management Plans and will also be responsible for ensuring compliance with the company Vision, Policy and Project specific commitments.

Under their contracts, contractors will be responsible for managing the potential environmental, socio-economic, safety and health impacts of all their contract activities including those of their subcontractors.

Contractors must, as part of their obligations:

- Demonstrate compliance with the Yara Dallol BV Vision, Health, Environment, Safety, Quality and Product Stewardship Policy and strategies.
- Demonstrate commitment to the ESIA and its Management Plans in their management structure;
- Identify individuals responsible for overall environment, social, safety and health management; and
- Undertake regular environmental, social, health and safety inspections and provide reports to allow for the monitoring and evaluation of performance.

Although the contractors will have the primary roles in delivering on the measures set out in the ESIA and Management Plans, Yara Dallol BV will have

the ultimate accountability for ensuring the measures are delivered. This accountability may be delegated to the other where applicable.

13.5 *STAKEHOLDER ENGAGEMENT*

Yara Dallol BV will continue to engage with stakeholders throughout the life of the proposed Project. During construction, communication with local communities and other local stakeholders will be undertaken by the Community Management Function who will work closely with the relevant contractors.

The objectives of ongoing stakeholder engagement are outlined in the Stakeholder Engagement Programme (*Annex C in Part II*) and include:

- To **ensure understanding and awareness** by facilitating an open, culturally appropriate and inclusive approach to engagement that provides timely and accurate information in an accessible and transparent way to all stakeholders, regardless of their status.
- To **manage expectations and concerns** by providing a mechanism which not only provides stakeholders an opportunity to freely provide comment and feedback but also allows Yara Dallol BV to respond to this feedback, thereby addressing concerns.
- To **manage risks through building sustainable relationships**. Stakeholder risks are widely recognised to be one of the key challenges facing the mining industry worldwide. Communities expect more open and transparent dialogue and longer term social commitments from companies. Engagement will allow Yara Dallol BV to understand stakeholder interests and issues and work with stakeholders to find mutually acceptable ways to achieve or address these.
- To **create value** where engagement allows for partnerships to be developed for the mutual benefit of both Yara Dallol BV and the stakeholders. This includes but is not restricted to corporate social investment activities. This relates also to seeking mutual benefit through design and operations by considering stakeholders and seeking their benefit in all Mine activities.

13.5.1 *Grievance Procedure*

In all cases it is important to have a robust and credible local mechanism to systematically receive and resolve grievances that might arise from both real and perceived impacts in order that they do not escalate and present a risk to operations and to corporate reputation. In the first instance and in order to avoid, wherever possible, a situation where a grievance occurs, Yara Dallol BV shall ensure that proactive stakeholder engagement practices are established for example through regular communication with local communities

representatives to update them on the proposed Project and its activities and associated impacts.

It is intended that the stakeholder engagement measures outlined above, and the mitigation and management measures outlined in all other environmental and social Management Plans, will work proactively towards identifying and addressing issues before they become grievances. However, when grievances are reported they need to be addressed in a consistent and verifiable manner. This will be done through the implementation of a grievance procedure.

Yara Dallol BV have developed a Grievance Procedure which outlines Yara Dallol BV's approach to accepting, assessing, communicating, resolving and monitoring grievances from those affected by Yara's activities including its contractors' activities. This procedure shall be considered and is linked to the Stakeholder Engagement Programme (*Annex C in Part II*) as both involve interaction with Yara's stakeholders. Furthermore, this procedure focuses on the recording and processing of complaints and grievances.

It is important to note that this Grievance Mechanism is *not* intended for the reporting of *incidents*, which should be dealt with through the ES-MS (refer to *Section 13.6.2*). The definitions of both a grievance and an incident are presented in *Box 13.2* below. Although their definitions may differ, there are clear links that need to be established between this grievance procedure and the incident reporting system.

Box 13.2 ***Grievance versus Incident***

A *grievance* is a concern or complaint raised by an individual or a group within communities affected by company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations, and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or to a complaint may be in the specific approaches and the amount of time needed to resolve it (IFC, 2009). Grievances are negative in nature.

An *incident* is any occurrence that has caused, or has the potential to cause, a negative impact on people, the environment or property (or a combination thereof). It also includes any significant departure from standard operating procedures.

In some cases, grievances may be linked to actual incidents, in which case the incident also needs to be reported.

The process for responding to and dealing with feedback of grievances is as follows:

- Receipt of Feedback or Grievance
- Recording of Feedback or Grievance
- Acknowledgement of Grievance
- Eligibility Assessment and Decision Making
- Formal Communication with Stakeholder
- Assessment of Significance of Feedback or Grievance

- Determination of Actions to Address Feedback or Grievance
- Actions Taken to Resolve Grievance
- Completion of Remedial Actions
- Ongoing Monitoring and Evaluation

This process is described in the Stakeholder Engagement Programme (*Annex C in Part II*).

13.6 KEY COMPONENTS FOR THE IMPLEMENTATION OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

Mitigation, monitoring and management measures are contained throughout this ESIA and in all environmental and social Management Plans. These measures all represent the *doing* and *checking* processes of the ES-MS framework depicted in *Figure 13.1*.

In addition to these commitments, other key components of the ES-MS include training, audits and inspections and reporting. These measures all represent the *doing* (training), *checking* (audits and inspections) and *acting* (reporting) processes of the ES-MS framework.

13.6.1 Training

The key components of training requirements are to ensure that all site personnel, including contractors understand the:

- Environmental and social requirements of the proposed Project and how these will be implemented and monitored on site;
- Contents and relevant requirements of Project actions contained within the applicable Management Plans;
- Environmental and social sensitivities of the Project Area and surrounds;
- Procedures to be followed in the event of non-compliance with the environmental and social requirements; and
- Procedures for responding to the media, unauthorised visitors to the site, and enquiries from the public.

All site personnel, including contractors must also:

- Know how to deal with unforeseen environmental and social incidents.
- Be fully aware of their roles and responsibilities with respect to environmental and social issues.

Project Sponsor Training Programme

One of the most important mechanisms for the enhancement of the Project's environmental and social performance will be the continued implementation of a training programme for all Project personnel including the personnel of contractors and subcontractors.

Training will include:

- Induction training for all staff including modules on: health and safety, environmental awareness, accommodation rules, worker code of conduct, stakeholder engagement, grievance mechanisms and cultural heritage awareness;
- Toolbox training for specific tasks; and
- Training for individuals involved in tasks with specific responsibilities.

Refresher training programmes will also be implemented to ensure continual improvement in environmental awareness for all Project personnel.

Training will be provided at each stage of the proposed Project, from initial establishment of logistical facilities through to construction, operation and decommissioning. The training function will assist managers in developing and coordinating training programmes as required.

Training records will be maintained by the training function and an assessment of the effectiveness of the training programmes will be included as part of the internal audit procedures.

Contractor Training Programme

Contractors will be responsible for ensuring that all their personnel are aware of their environmental, social and health responsibilities. They will develop and implement training programmes to the satisfaction and approval of the Project Sponsors.

Training will include:

- Induction training for all staff prior to carrying out any work on site. This will include modules on: health and safety, environmental awareness, accommodation rules, worker code of conduct, stakeholder engagement, grievance mechanisms and cultural awareness;
- Toolbox training for specific tasks;
- Training for individuals involved in tasks with specific responsibilities; and

- Training programmes organised by the Project Sponsor as required.

The contractor will keep auditable records of training given. Assessment of the effectiveness of the training programme will be included as part of the ES-MS audit procedures.

13.6.2 *Responses to Incidents*

An **incident** is any occurrence that has caused, or has the potential to cause, a negative impact on people, the environment, property or production (or a combination thereof). It also includes any significant departure from standard operating procedures. The reporting and investigation of all potential and actual incidents that could have a detrimental impact on human health, the natural environment or property is required so that remedial and preventive steps can be taken to reduce the potential or actual impacts as a result of all such incidents.

The Yara Dallol BV procedure relating to the reporting of incidents (TOPS 0-01 ⁽¹⁾) provides a classification of incidents into 5 categories of severity for the following types of incidents (*Table 13.1*):

- Environmental incidents;
- Incident with injury of people;
- Incident with property damage or loss of production; and
- Security breach.

All incidents will be registered by using Yara's Synergi database. Details of this process are provided in the TOPS 0-01 procedure. Moreover, all incidents will be investigated for identification of causes and preventative actions. All investigations must be organised and carried out in accordance with Yara Dallol BV's procedure on investigation and follow-up of accidents and near miss incidents (as detailed in TOPS 0-02 ⁽²⁾).

The actions resulting from any formal or informal investigations will be used to update this ERP.

(1) TOPS 0-01 – an existing Yara Dallol BV procedure titled “TOPS 0-01 Reporting of Accidents, Near-miss Incidents, Sick Leave, Environmental Incidents and Security Breaches”

(2) TOP 0-02 – an existing Yara Dallol BV procedure titled “ Investigation and Follow-up of Accidents and Near-miss Incidents”

Table 13.1 Incident Categories (as per existing Yara Dallol BV procedures [TOPS 0-01])

Major Severity 1	Major Severity 2	Medium Severity 3	Medium Severity 4	Minor Severity 5
ENVIRONMENTAL INCIDENT				
Accidental release of hazardous material, liquid or gas to air, water or ground with serious long terms environmental impacts. International Media Coverage Clean-up cost or legal penalty of more than 10 million Euros (or more than 15 million USD).	Release with serious short term environmental impacts National media coverage Clean-up cost or legal penalty in the range of 1 to 10 million Euros (or 1.5 to 15 million USD).	Release with the potential for short term local impact. Local media coverage. Permit breach with the potential for legal charges.	Release with no apparent environmental impact. Permit breach without legal charges.	Minor release without environmental impacts or negative publicity.
INCIDENT WITH INJURY OF PEOPLE				
Fatality	Lost Time Injury with a serious injury consequence (resulting in permanent or long term disability)	Lost Time Injury without serious injury consequence.	Restricted work case. Medical treatment case.	First aid injury
INCIDENT WITH PROPERTY DAMAGE OR LOSS OF PRODUCTION				
Economic loss in excess of 10 million Euro. International media coverage.	Economic loss in the range of 1 to 10 million Euros (1.5 to 15 million USD). National media coverage.	Economic loss in the range of 0.1 to 1 million Euros (or 0.15 to 1.5 million USD).	Economic loss in the range of 0.01 to 0.1 million Euros (or 0.015 to 0.15 million USD).	Economic loss less than 0.01 million Euros (or less than 0.015 million USD).
SECURITY BREACH				
Serious consequences for Yara Dallol BV with the equivalence environmental incident, incident with injury of people, incident with property damage or loss of production Major Severity 1.	Serious consequences for Yara Dallol BV with the equivalence environmental incident, incident with injury of people, incident with property damage or loss of production Major Severity 4	Serious consequences for Yara Dallol BV with the equivalence environmental incident, incident with injury of people, incident with property damage or loss of production Major Severity 3	Serious consequences for Yara Dallol BV with the equivalence environmental incident, incident with injury of people, incident with property damage or loss of production Major Severity 4	Negligible consequences.

Source: TOPS 0-01 Reporting of Accidents, Near-miss Incidents, Sick Leave, Environmental Incidents and Security Breaches

Yara Dallol BV will implement an incident investigation and follow-up process as set out in the TOPS 0-02 procedure. The actions resulting from any formal or informal investigations will be used to update the applicable environmental and social Management Plans. The Audit programme (presented in *Section 13.6.3* below) should be revised to audit areas or aspects where incidents occur more regularly to ensure that the potential for such incidents recurring are minimised.

13.6.3 *Audit and Inspection*

An audit programme detailing the aspects to be audited, the area (relevant department or section), and the frequency of audits will be established. The audits will be based on appropriate protocols prepared by the various environmental, social and health functions detailed in *Section 13.4* on *Page 13-9*.

Regular environmental, social and health audits and random spot checks will be undertaken by selected audit team members throughout all phases of the proposed Project. The audit and inspection frequencies will be defined, and may be increased or decreased according to the findings and degree of confidence in the audit programme. Audits will also assess compliance with agreed objectives and targets as well as the effectiveness of the management plans and their implementation.

Audit findings will be reviewed by the applicable management functions and where corrective actions are deemed necessary; the relevant management plans will be updated.

13.6.4 *Reporting*

The proposed Project will develop a system of internal reporting that allows for appropriate reporting on the effectiveness of the ES-MS. Public reports will also be prepared on a range of issues of interest or concern to local communities.

During the construction phase, contractors are required to take all appropriate measures in its ES-MS and related plans and procedures to identify and document incidents of environmental and social non-conformance. These records should be produced at no less than weekly frequency, identifying the category of non-conformance, its potential severity and its frequency to be demonstrated. The resultant records will be addressed in the appropriate management meetings to initiate corrective actions required.

These records are intended to facilitate the purposeful reduction of incidents of non-conformance, leading to a consequential reduction of the root causes of such incidents.

All management plans include a monitoring plan detailing parameters that will be monitored. The results from this data will be reviewed by the Yara

Dallol BV Health and Safety Manager and Environmental and Social Manager. These reports must within five working days of month end be registered on Yara Dallol BV's Synergi database. The registering of incidents must be carried out in conformance with TOPS 0-01.

Annual reporting will be undertaken to review performance over the previous year and will set targets for subsequent years.

13.6.5 *Management of Change*

As is discussed in *Chapter 6*, as Project design is finalised, and as additional baseline data is gathered, a greater level of certainty regarding the impacts of the proposed Yara Dallol Potash Project will emerge. Accordingly, Project design changes may occur that need to be accommodated by Yara Dallol BV and their associated contractors. Similarly, the organisational structure and roles and responsibilities provided under Section 13.4 on *Page 13-9* may also change as the proposed Project progresses.

The ESIA process does not stop with submission of the reports. Therefore, the ESIA Management Plans will require a mechanism to manage change effectively. At times these changes may be material, potentially influencing the original findings of the ESIA, and hence, the basis for its approval. Such a mechanism to manage change, or a change management system, must ensure that changes to the scope of the proposed Project are subjected to a robust social and environmental assessment process. Any changes to Project scope will be evaluated for their degree of significance, and will be incorporated into the appropriate Yara Dallol BV documentation as follows:

- Minor changes will be reflected in updates to the applicable Management Plans; and
- Substantive design / technology changes that might potentially alter the ESIA findings (i.e. those that result in changes to the predicted significance of environmental and socio-economic impacts) will be subject to re-assessment, further stakeholder consultation, supplementary reporting and revision of the Project's Environmental and Social Management Plans. Typically, such substantive changes will be submitted as an addendum to this ESIA.