

PROJECT INDUCED IN-MIGRATION MANAGEMENT PLAN

ROVUMA LNG PROJECT

MZLN-EL-RPPLN-00-0009



REVISION MODIFICATION LOG

Revision	Section	Description
0		Issued for Use



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LIST OF REFERENCES

Environmental and Social Management System (ESMS)

Camps and Accommodation Requirements Plan

Employment and Worker Relations Plan

Community Development Support Plan

Community Health, Safety and Security Management Plan

Security Fences

Local Content Management Plan

Environmental Impact Assessment (EIA)

ExxonMobil's Principles on Security and Human Rights (also referred to as the Framework on Security and Human Rights)

ExxonMobil's Upstream Land Use and Socioeconomic Management Standards

Grievance Management Plan

IFC's Performance Standard (PS) 5

Projects and People – A Handbook for Addressing Project-Induced In-migration, IFC, 2009

Stakeholder Engagement Plan

Biodiversity Strategy

The laws and regulations of Mozambique

Anadarko's Project Induced In-migration Management Plan (2019)



1. INTRODUCTION

MZLN-EL-RPPLN-00-0009 Rev 0 – Project Induced In-Migration Plan is an individual, topic specific plan comprising an integral component of MZLN-EL-RPPLN-00-0016 Rev 0 – Rovuma LNG Environmental and Social Management Plan (ESMP).

Information regarding the Project Overview, Objectives (of the ESMP), Scope, Project Components and Associated Facilities and other information regarding the context of the ESMP can be referenced in MZLN-EL-RPPLN-00-0016 Rev 0 – Rovuma LNG Environmental and Social Management Plan.

The principal objective of the ESMP is to facilitate the avoidance, reduction, and mitigation of environmental, social and community health, safety and security risks and impacts associated with the construction phase of the Midstream Project.

The ESMP sits within a broader Environmental and Social Management Framework, as illustrated in Figure 1-1 as shown in MZLN-EL-RPPLN-00-0016 Rev 0 – Environmental and Social Management Plan.

This Framework comprises two overarching, system-level documents (MZLN-EL-RPPLN-00-0016 Rev 0 – Environmental and Social Management Plan and MZLN-EL-RBENV-00-0001 Rev 0 – Environmental and Social Requirements for Contractors) and a set of theme and activity-specific documents that collectively describe how the Project will manage its environmental and social (E&S) risks. The listing of the ESMP set of documentation is contained below:

- MZLN-EL-RPPLN-00-0016 Rev 0– Environmental and Social Management Plan (ESMP)
- MZLN-EL-RAZZZ-00-0001 Rev 0 Requirements for Camps and Accommodation
- MZLN-EL-RBENV-00-0001 Rev 1 Environmental and Social Requirements for Contractor (with Annexes)
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 1 Air Quality, Greenhouse Gases and Energy Efficiency
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 2 Effluent Discharges
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 3 Waste Management
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 4 Hazardous Materials
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 5 Site Development, Construction and Reinstatement
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 6 Road Traffic and Transport
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 7 Marine Operations
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 8 Water Use and Abstraction
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 9 Raw Materials and Aggregates
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 10 Dredging
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 11 Lighting and Visual Impact
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 12 Ballast Water and Biofouling



- MZLN-EL-RBENV-00-0001 Rev 1 Annex 13 Weed and Pest Management
- MZLN-EL-RBENV-00-0001 Rev 1 Annex 14 Wildlife Protection
- MZLN-EL-RPLCP-00-0001 Rev 0 Local Content Management Plan
- MZLN-EL-RPPLN-00-0005 Rev 0 Community Development Support Plan
- MZLN-EL-RPPLN-00-0007 Rev 0 Cultural Heritage Management Plan
- MZLN-EL-RPPLN-00-0008 Rev 0 Supplemental Land Access Management Plan
- MZLN-EL-RPPLN-00-0009 Rev 0 Project Induced In-Migration Management Plan
- MZLN-EL-RPPLN-00-0013 Rev 0 DUAT Encroachment Management Plan
- MZLN-EL-RPPLN-00-0014 Rev 0 Employment and Worker Relations Plan
- MZLN-EL-RPSEP-00-0001 Rev 0 Stakeholder Engagement Management Plan
- MZLN-EL-RPPLN-00-0006 Rev 0 Community Health Safety and Security Management Plan
- MZLN-EL-RPPLN-00-0004 Biodiversity Strategy
- MZLN-EL-RPPLN-00-0011 Biodiversity Action Plan

This Project Induced In-migration Management Plan (Plan) describes how the Rovuma LNG Project (Project) will manage project induced in-migration (PIIM) associated with Project activities during the Construction period in accordance with Mozambican legislation, commitments made in the Project Environmental Impact Assessment (EIA), international financial institution expectations, and experience drawn from projects in similar environments.

PIIM is defined as the movement of people into an area in anticipation of, or in response to, economic opportunities associated with the development and / or operation of a new project (IFC, 2009).

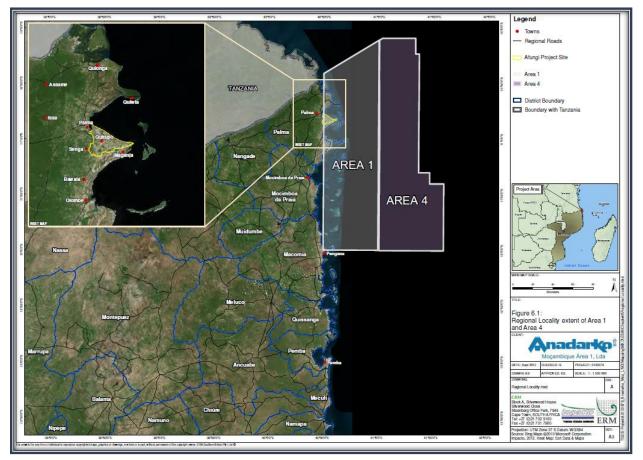
1.1. Scope

This Plan addresses all project induced in-migration impacts associated with the development of the Mozambique Rovuma Project during the construction period. The Project is focused on the development of offshore block Area 4 which includes the development of two LNG gas trains in the Afungi Peninsula. ExxonMobil will be responsible for all midstream activities associated with the Project.

The Project will be implemented independently but alongside the development of the Area 1 offshore gas block, developed by Anadarko Moçambique Área 1, Lda (AMA1) within the Rovuma Basin DUAT. The Area 1 project (AMA1) will also develop two LNG gas trains in the same shared Project Industrial Zone (PIZ) in the Afungi Peninsula (see Figure 1-1 and Figure 1-2).



Figure 1-1: Offshore Gas Areas

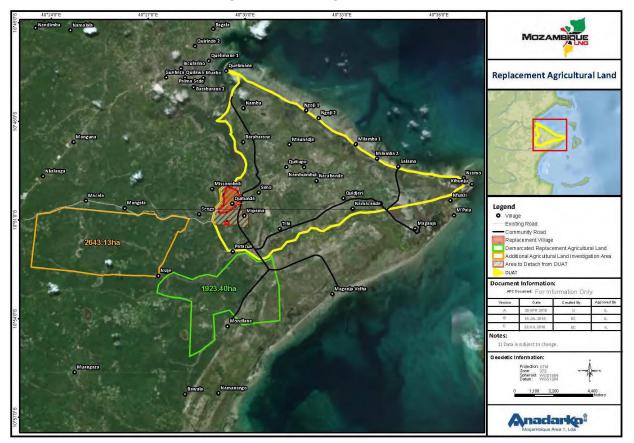


An area of approximately 6, 500 hectares has been acquired through a DUAT (Direito de Uso e Aproveitamento de Terra) Process, to accommodate the shared PIZ, Replacement Village (RV), and Livelihood Development Zone (LDZ).



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Figure 1-2: Afungi Peninsula



In principle, this Plan addresses the management of PIIM related to construction of the Rovuma Project, with a separate management plan (implemented and stewarded by AMA1) addressing PIIM related to the Area 1 Project. However, at a practical level, it will be challenging to differentiate between impacts resulting from the introduction of people to the area, and as such, ExxonMobil Moçambique Limitada (EMML) and AMA1 have agreed to collaborate in the assessment and management of PIIM associated with the development of natural gas resources in a coordinated manner. EMML and AMA1 have shared and will continue to share their respective PIIM management plans and will seek to coordinate their PIIM management activities where appropriate.

Within this Plan, the construction period is defined to include both the early works and construction phases as defined for both projects.

The scope of this Plan is based on reasonable expectations of the nature and location of anticipated PIIM activity associated with the Project. PIIM is expected to occur in areas where inmigrants anticipate they will be able to participate in and access the opportunities associated with the Project. The rationale for the inclusion of these locations is defined in Section 6, however they are assumed to include, in varying degrees, the following locations:

- DUAT
- Palma Town

- Palma District
- Mocimboa de Praia town
- Roads (including the R762)
- Pemba
- The coastal corridor from the Tanzanian border down to the city of Mocimboa de Praia.

Within this Plan, PIIM is defined as all in-migrants seeking employment, business opportunities, direct or indirect benefits (real or perceived) resulting from the presence of the Project (with the exception of direct employees), regardless of whether they have family ties or social connections to people already residing in the Project area.

1.2. Objectives

The objectives of this Plan are to:

- Minimize potential levels of project induced in-migration
- Manage the impacts generated by in-migration which cannot be prevented
- Establish monitoring requirements to evaluate the impacts of PIIM on communities.

1.3. Linkage to Other Management Plans

This plan draws together all of the management measures related to PIIM for the construction phase of the Project. The management of PIIM crosses many management areas and as such, while this Plan is intended to be a stand-alone document, it should be read in conjunction with, but not limited to, the following:

- MZLN-EL-ASPDS-02-0001 Construction Camp Requirements
- MZLN-EL-RAZZZ-00-0001 Rev 0 Camps and Accommodation Requirements Plan
- MZLN-EL-RPPLN-00-0014 Rev 0 Employment and Worker Relations Plan
- MZLN-EL-RPPLN-00-0005 Rev 0 Community Development Support Plan
- MZLN-EL-RPPLN-00-0006 Rev 0 Community Health, Safety and Security Management Plan
- MZLN-EL-SSPDS-00-0003 Security Fences
- MZLN-EL-RPLCP-00-0001 Rev 0 Local Content Management Plan
- MZLN-EL-RPPLN-00-0004 Biodiversity Strategy and Action Plan
- Resettlement Plan for the Mozambique Gas Development Project (<u>http://www.mzlng.com/content/documents/RP_Vol_1_Eng.pdf</u>)



2. ACRONYMS AND TERMS

Term	Definition		
Affected Communities	Local communities directly affected by the Project		
AMA1	Anadarko Moçambique Área 1, Lda		
Aol	Area of Influence		
Area 4/MRV	Moçambique Rovuma Ventures S.p.A.		
BHS	Baseline Health Survey		
CMP	Contractor Management Plans		
EMML	ExxonMobil Moçambique Limitada (EMML) is the ExxonMobil Affiliate conducting Midstream Operations for MRV.		
DUAT	Direito de Uso e Aproveitamento da Terra (Land Use and Benefit Rights): A right to use and benefit from land. The term refers to the right as well as the documentary proof of such right.		
EEA	Eni East Africa		
EIA	Environmental Impact Assessment		
EM	ExxonMobil International Limited		
EME	Eni Mozambique Engineering Limited		
EMML	ExxonMobil Moçambique Limitada		
ENHL	Empresa Nacional de Hidrocarbonetos, E.P.		
ERB	Eni Rovuma Basin		
ESMS	Environmental and Social Management System		
IFC	International Finance Corporation		
GoM	Government of Mozambique		
LNG	Liquefied Natural Gas		
LSA	Local Study Area (as defined in the BHS)		
Operations	The Operations (or Production phase) of the Project		
Opportunist Migrants	Unskilled, semi-skilled, or skilled people seeking direct or indirect employment or entrepreneurial opportunities. Very skilled, experienced, and mobile workers often travel from project to project or with major contractors.		
Opportunistic Settlement	Settlement on the Project's DUAT by outsiders primarily for the purposes of extracting compensation or other economic benefits from the Project.		
Project Induced In- Migration (PIIM)	The movement of people into an area in anticipation of, or in response to, economic opportunities associated with the development and/or operation of a new project. ¹		
Project Industrial Zone (PIZ)	Area that non-project related people or vehicles are prohibited to enter as this is the area where the Project will be constructing the LNG Plan and other facilities. This zone also includes all of the areas where community health and safety cannot be guaranteed and where permanent residence is not allowed.		
Project	The development of the onshore and nearshore facilities for Area 4 by EMML, in conjunction with its nominated contractors.		

¹ International Finance Corporation (IFC), Projects and People: A Handbook for Addressing Project-Induced In-Migration, 2009, Page v.



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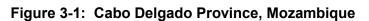
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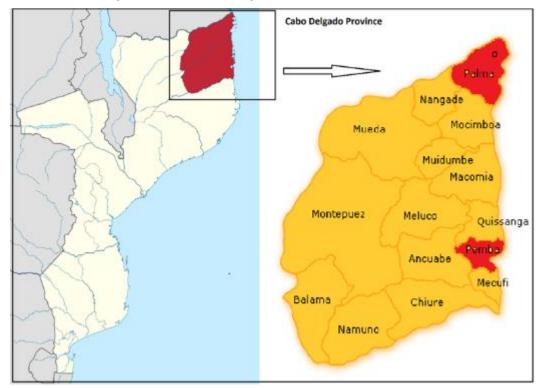
Term	Definition	
RBLL	Rovuma Basin LNG Land, Lda.	
RV	Resettlement Village	
Spontaneous Settlement	Unregulated, spontaneous growth of settlements that are typically associated with high density occupancy and poor living conditions, including inadequate housing, water, and sanitation. ² The settlements are a result of the in-migration of fortune seekers that occupy land for which they have no legal title for the purpose of establishing residence and/or livelihoods.	

² IFC, Projects and People: A Handbook for Addressing Project-Induced In-Migration, 2009, Page 99.



3. PROJECT DESCRIPTION





The on-shore Area 1 and Area 4 project elements will be developed in three distinct Project phases:

- Phase 1 Early Works. This phase will be undertaken in advance of the main construction phase and will comprise:
 - Construction of the resettlement village (to be led by Area 1, Area 4 50% partner)
 - Road improvements to increase the width of existing roads as well as establishing new roads to gain access to infrastructure
 - Development of Project support infrastructure to support construction which will include a new Palma-Afungi Road; 33kW power line; pioneer camp accommodation expansion; construction of an airstrip near Palma; and construction of administrative buildings and permanent housing
 - Demarcation and signage erection for the Project Industrial Zone
 - Work site preparation, including removal of vegetation and topsoil within the footprint of the planned construction area
 - Additional Pioneer Camp for Area 4
 - Other activities including earthworks, installation of utilities and foundations, construction of roads, and other infrastructure.



- Phase 2 Construction and Development. This is the main construction phase of the Project which involves the construction of the onshore LNG facilities and associated infrastructure (work accommodation facilities, construction work areas, access roads, utilities and control systems), including marine facilities (e.g., Materials Offloading Facility [MOF] and LNG jetties). The footprint of the current planned onshore infrastructure, including the airstrips, is approximately 3,600ha of the approximate overall 6,500ha covered by the DUAT.
- Phase 3 Operations. This phased will include the commissioning and subsequent operation of the LNG facilities and the collection of gas from offshore wells and export to market from the marine export facility. Permanent worker accommodation will be designed and constructed to accommodate 400 core operational workers.

	EMML— Total	EMML— Mozambican	AMA1— Total	AMA1— Mozambican
Early Works	150–180	~ 150	5,000	~
Construction and Development	15,000–23,000	5,000	15,860	6,030
Operations	1,000–1,600	800–1,100	1,400	600

Table 3-1: Peak Workforce Estimates

As noted in Table 3-1, it is anticipated that during construction, the EMML could require an estimated workforce of 15-23,000 people of whom more than 5,000 are expected to be Mozambican. This will be in addition to the anticipated construction workforce associated with AMA1 construction activities which is expected to have a peak total construction workforce of 16,000, and a peak Mozambican workforce of 6,000. The timing of the construction phases for the two projects are likely to overlap, however the exact schedule will depend on the financial investment decision (FID) for each project. For the purposes of this Plan, it is reasonable to assume that at peak construction, an estimated total workforce of 35,000–40,000 may be mobilized to the Afungi Peninsula, with a peak Mozambican workforce during construction of approximately 10-11,000. Importantly, the scale of workforce required for Operations will be a fraction of this size—in the order of 10% of the peak construction workforce.

During the course of the development of the Project, an airstrip and MOF will be developed in proximity to the Project, and improvements to and extensions of roads will be undertaken. Prior to the completion of these activities (mostly scheduled for Early Works) and to supplement these new facilities, the following areas will also be required to support transport and logistics requirements:

- The airport in Mocimboa de Praia will serve as the primary entry point for non-local workers to the Project
- Workers and goods will be transported by road from Mocimboa de Praia to the Afungi Project site along the R762
- EMML will utilize Pemba as a logistics hub, with a small workforce based in Pemba city
- Temporary marine offloading facilities will be utilized proximal to the planned MOF location until such time as the MOF is available for use.



4. INSTITUTIONAL AND LEGAL FRAMEWORK

4.1. Mozambican Laws and Regulation

Mozambican law does not provide specific regulation on PIIM.

4.2. EIA Conditions

The Project EIA Report identified the potential for PIIM to be generated by the Project and committed the Project to undertaking the following mitigation measures (Table 4-1).

Reference	Item	Commitment	Home
EIA - 13.2.4	The Project will undertake a PIIM Study and develop specific mitigations to reduce the likelihood, magnitude, and intensity of PIIM- related negative impacts. These will be incorporated into the relevant Project and Contractor ESMPs and Project Design.	EIA condition	PIIM
EIA - 13.4.4	Local Government Roles and Responsibilities: Engage with relevant government departments and authorities to understand their mandated roles and responsibilities for land ownership, land occupation (including allocation) and land-use planning, specifically in the Palma District	EIA condition	PIIM
EIA - 13.4.4	Share with provincial and District-level government the mitigation measures that the Project will implement to reduce the potential for PIIM.	EIA condition	PIIM
EIA - 13.4.4	 Facilitate engagement with relevant government representatives at provincial, regional and District level and the NGO and donor community to help develop spatial land-use plans, land zoning and a Palma District master plan to assist government to plan effectively for: Plan future land use Anticipate planning, infrastructure development and maintenance needs Exercise good governance and accountability in fiscal management Enable revenue distribution from central and provincial government to deliver economic and social development benefits Assist government and civil society organization capacity building Implement capacity building within the law and order, border control sector 	EIA condition	PIIM



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Reference	Item	Commitment	Home
EIA - 13.4.4	Develop representative community groups to discuss PIIM actively.	EIA condition	PIIM
EIA - 13.4.4	Build capacity to identify culturally appropriate and traditional methods for discouraging the arrival of outsiders into a community, including methods for land allocation and rights to engage in livelihood activities.	EIA condition	PIIM
EIA - 13.4.4	Engage with local government to understand public and private sector roles and responsibilities associated with the management of direct and indirect impacts associated with PIIM.	EIA condition	PIIM
EIA - 13.4.4	Engage with local government to encourage the establishment of areas of unoccupied land or other buffers around the Project (including resettled communities) and minimize nearby uncontrolled and spontaneous land occupation.	EIA condition	PIIM
EIA - 13.4.4	Project Design and Facilities Access: Operate a closed camp for the expatriate, other country national (OCN) and national workforce on rotational work schedules, with all accommodated contractors prohibited from direct engagement with local communities.	EIA condition	Camps and Accommodation
EIA - 13.4.4	Adopt a fly-in, fly-out transportation policy for rotational staff to limit communities' direct interaction with the Project workforce	EIA condition	Employment and Worker Relations
EIA - 13.4.4	Where possible, limit work vehicles and machinery to designated access and work site areas, and discourage the land-based transportation of Project equipment to limit vehicle traffic to the Afungi Project Site, thereby reducing the motivation for in-migrants to follow Project vehicles towards the Project Camp and work sites.	EIA condition	Road Traffic and Transport
EIA - 13.4.4	Limit the movement of employees and contractors to within Project-defined areas, using designated transport (i.e. no walking outside the Onshore Project Footprint) and transportation routes (i.e. designated Project roads).	EIA condition	Road Traffic and Transport
EIA - 13.5.4	Prevent the development of spontaneous camps or the expansion of existing communities (camp- follower communities) that are close to the Afungi Project Site and specifically the temporary workers camp (TWC), by speculative migrants	EIA condition	DUAT Encroachment PIIM
EIA - 13.5.7	PIIM mitigation measures as part of multidisciplinary planning.	EIA condition	PIIM



4.3. International Good Practice

The IFC Performance Standards require a Client to identify all social and environmental risks and impacts associated with a project. PIIM is a recognized potential impact associated with large-scale projects, and as such, the IFC Performance Standards require that it be identified, assessed, minimized, and managed. In addition to the general guidance on the management of impacts within the IFC Performance Standards, IFC's handbook on PIIM, Projects and People – A Handbook for Addressing Project-Induced (2009) has informed the development of this Plan.



5. SOCIAL CONTEXT

The Project will be developed in Palma District, a previously remote region of northern Mozambique. The area is undergoing and will continue to experience significant change with the development of the natural gas reserves, both on-shore and off-shore.

Palma District is one of sixteen districts in Cabo Delgado province, and the District itself comprises four administrative posts, six localities and several villages. The Afungi project site is located primarily in the Palma Administrative Post and in the Locality of Mute, south-east of Palma town, with a small portion of the Afungi site overlapping the Olumbi Administrative Post.

In 2012, the population of Palma District was estimated to be close to 52,000 people (reported as 48,318 in the 2007 census), with the Locality of Mute comprising 32% of that population. In 2007, the population of Palma Sede Locality (which includes Palma Town) was recorded as 15,673. It is recognized that Palma Town has grown considerably in the past eleven years, with preliminary census data from 2017 indicating a population of 35,632. It is also recognized that villages in proximity to the Project have grown in recent years, as a result of PIIM. This has been most noticeable in the villages surrounding the DUAT (e.g., Senga). Preliminary census data for 2017 for Afungi communities is summarized in Table 5-1.

Community	Total Population (2017 Census)	
Maganja	2,642	
Quitupo	1,555	
Senga	1,057	
Mondlane	2,781	
Macala	358	
Afungi Communities Total	8,393	

Table 5-1: Estimated Afungi Population (Adapted from Anadarko [2019])

The communities likely to be affected by PIIM are predominantly reliant on fishing and agriculture resources. Over-exploitation of resources, both forestry and fishing, were widely reported prior to the development of the Project. In particular, mangroves are regularly cut and plants with medicinal values are over-harvested.

A complex picture of international and national population movement exists in and around the Project area, involving regular traders from Tanzania, fishermen from Tanzania and other parts of northern Mozambique, and Mozambicans and Tanzanians passing through Palma District heading north or south respectively. Limited transport connections, and cultural factors, are understood to have historically limited the connectivity between this part of northern Mozambique and the southern and central provinces.

The villages of Palma District are largely unplanned areas, with interspersed residential and agricultural zones. Conflicts over land ownership and land use are relatively common and are reported to be increasing. The Project EIA reported that the majority of land occupied by households in the Afungi Project Site and Surrounds was acquired by occupation (42%) or inheritance (31%). It was estimated that 12% acquired land through the community authority which is inferred to mean that these households have come from other areas and have moved into the District, acquiring land through community channels. In order for the in-migrant household to secure land in this manner, the practice is for the Community Leader to present the new arrival



to the community and seek community opinion on whether they can acquire the land. While land acquisition is controlled, to an extent, as described above, the EIA also reported a growing trend of land leasing which is not subject to control by authorities or Community Leaders.

Palma Town, while considerably larger in scale, also lacks town planning and has grown organically as the population has expanded. Where development plans exist, they often lack detail and did not foresee the expansion of the towns at such a rapid pace.

Several Government-led development and land-use plans are under development or awaiting implementation. One of these is the initial stages of development of a Master Plan for the Afungi Peninsular by ENHL, covering an area of 18,000 ha around the 6,500 ha covered by the DUAT. The aim of the Master Plan is to develop an aligned growth strategy for Afungi Peninsular, capable of supporting the development of both Projects and their supporting infrastructure and industrial needs. The contract for the development of the Master Plan was awarded to Renco in October 2018, with the expectation that all proponents in the Rovuma basin will participate in the development of this plan.

At both District and Provincial levels, public services and infrastructure are deemed to be inadequate for the current population. This is evident in over-crowded schools, insufficient health facilities, and a general lack of infrastructure in both villages and towns.

As reported in the Regional Health Impact Assessment (HIA), across Palma District, sanitation services are practically non-existent with most communities practicing open defecation in the sea or the bush, and only 23% of the baseline household survey respondents indicating they had access to some form of latrine in 2013. Both Mocimboa de Praia and Palma Districts reported increases in diarrheal diseases in recent years and it remains one of the top 10 causes of morbidity. The absence of waste collection systems in both villages and towns further amplifies this health risk.

A detailed community health baseline is captured in the Regional HIA (2018), however an overview of key statistics is provided in this Plan to support comparisons conducted as part of the monitoring and evaluation activities:

- The prevalence of HIV in Palma District is estimated to be around 3% (based on statistics from local health centers collected in 2011).
- Transactional sex was present in the project area, however respondents indicated that it was not tolerated or accepted.
- The 2011 national demographic and health survey reported high rates of malnutrition in Cabo Delgado province, with 52.7% of children under 5 years having stunted growth, 5.6% had experienced wasting, and 20.6% were underweight for their age. These rates were all worse than national averages.
- Approximately 72% of male and females acknowledged that substance abuse was a problem within their community during the surveys conducted to inform the Baseline Health Survey (2013).
- The 2013 BHS reported that 73% of households in the local study area (LSA) collected their water from an improved source. Despite this, only 53% of water samples tested from community sources were compliant or within tolerable limits based on drinking water standards for fecal coliforms.



6. PROJECT INDUCED IN-MIGRATION IMPACTS

The likelihood of a project experiencing in-migration is often predicted on the basis of three factors:

- Existence of a mobile population
- Characteristics of the Project
- Capacity of the area to meet Project needs.

Taking each factor in turn:

- The Rovuma Project is being developed in a region with considerable population mobility and insufficient employment opportunities at present. The region, as described in Section 3, has a history of national and international movement for trading and resource access. Experience to date also indicates that while land acquisition practices in villages may constrain, to some extent, the sale of land to in-migrants, new leasing arrangements are likely to usurp these controls. Any such controls in towns or cities are considerably weaker.
- Palma and Pemba have experienced aspects of a boom-bust cycle, illustrating the mobility of population and real and perceived opportunities exist.
- Given the scale of the Project, it will generate considerable expectations of opportunities for local and non-local communities alike. The employment of a combined peak construction workforce of potentially 10-11,000 Mozambicans (35,000–40,000 workers in total) will represent a very significant increase from the 327 individuals recorded as being employed by private enterprise in Palma District in 2007 (as reported in the EIA). A Project of this scale is likely to attract some level of opportunistic in-migration regardless of the mitigation measures which are implemented.
- Linked to the point above, the scale of the Project, with more than 5,000 Mozambican jobs anticipated from EMML's construction activities alone, the Project demand will likely exceed the supply of work-ready labor in Palma District. In addition, the capacity of the area around the Project to meet additional demands from increased population is relatively low, with resources, services and infrastructure already constrained.

Considering each of these factors, it is highly likely that the Rovuma Project will experience significant levels of in-migration.

6.1. Identification of Anticipated Impacts

PIIM has the potential to generate both positive and negative impacts. Table 6-1 provides a highlevel summary of the key impacts potentially associated with PIIM.



Table 6-1: Identification of Positive and Negative Impacts of PIIM(Adapted from IFC, 2009)

Positive Impacts	Negative Impacts		
Increased local skills base and local labor pool	Landscape level	Increased exploitation or over-exploitation of natural resources (forestry, agricultural land, fishing resources etc.)	
Business development opportunities and increased accessibility of goods and services		Loss of biodiversity	
Employment creation		Erosion and loss of soil productivity	
Increased local tax revenues		Increased pressure on, and possible disputes over, land use and common property natural resources	
Increased individual, household, and community empowerment stemming from increased wealth and income	Infrastructure, services, and utilities	Increased use of existing roads and transportation systems	
Monetization of remote rural economics, improving purchasing power and increasing trade		Increased pressure on education and health services	
Increased household wealth from sale or leasing of land	-	Increased pressure on waste management systems	
Improved access through development of road systems		Increased demand for water supplies and sanitation (and electricity to the extent that the service is available)	
Improved information and communication		Unplanned and uncontrolled development of squatter settlements	
Increased attention and input from government agencies and NGOs etc.		Increased demand for housing and materials for housing construction	
Increased political power	-	Increased use of / demand for community, religious and recreational facilities	
	Local economy and	Increased poverty	
	Livelihood strategies	Inflation (increased cost of living)	
	Strategies	Competition or economic resources and employment	
		Reduced availability and quality of land, food, fuel and housing	
		Reduced reliance on local subsistence production systems	
		Increased dependence on broader cash- based economy to meet needs	
		Increased economic vulnerability for marginal groups	



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Positive Impacts	Negative Impacts		
	Health	Increased incidence of accidents and fatalities associated with increased traffic	
		Increased pollution (air, water, dust, noise and traffic)	
		Proliferation of communicable diseases	
		Insufficient health service resources	
		Inadequate public hygiene facilities	
		Changes in nutrition status	
	Social dynamics	Impacts on traditional beliefs, damage to cultural heritage	
		Loss of knowledge, skills and experience related to traditional livelihood activities	
		Changes to traditional leadership, behavior, customs, values and norms	
		Changes in power relationships	
		Welfare imbalances and differential wage incomes, wealth accumulation and opportunities	
		Dilution of social cohesion	
		Loss of local identity	
		Creation of land markets leading to changes in traditional land tenure systems	
		Increased tensions, disputes and conflicts between locals and migrants concerning natural resources, employment opportunities and other project benefits	
		Increased incidence of social ills, including alcoholism, drug abuse, prostitution, gambling	
		Increase in domestic violence	
		Increase in criminal activity	
		Decrease in law and order	
		Increased ethnic tension and violence	

6.2. Potential PIIM Hotspots Related to the Rovuma Project

Using experience gained from other extractive sector projects in the region and globally, potential in-migration hotpots have been identified. A "hotspot" can be defined as a location, typically a town or village, where opportunistic in-migration is anticipated. The identified hotspots have taken into consideration:

- The location of perceived opportunities (jobs, contracts, etc.)
- Restricted access to resources (e.g., loss of ocean access along the eastern coast of the Afungi Peninsular)

- Existing population centers which may be open to opportunistic settlement
- Transport and logistics routes
- Traditional / existing border crossing zones between Mozambique and Tanzania.

Using these criteria, the following potential hotspots have been identified:

- Palma Town and Afungi Area (see
- Figure 6-1):
 - Palma Town—as the largest population center in proximity to the Project, Palma Town has already experienced some in-migration and this is expected to increase as construction commences.
 - Senga and the Resettlement Village—given their proximity to the Project site, both villages are likely to experience PIIM pressure.
 - Maganja, Nsemo, M'Paia, and Nfunzi—as coastal communities along the Afungi Peninsular, these villages may experience PIIM as other Afungi communities seek to regain or improve their access to the coast following the implementation of DUAT access restrictions and during the construction period for the marine facilities, and as dormitory communities for the families of workers.
 - Mondlane, Macala, and Mangala—located to the south and north (respectively) of the demarcated replacement agricultural lands, these villages will potentially experience PIIM impacts associated with increased pressure on its resources (land, water, housing etc.). They are also in close proximity to the Project and may be seen as an entry point for jobs and business opportunities.
 - Afungi-Palma road, Manguna and Nkumbi—both along newly developed and existing access roads and at the junctions (both current and planned) of the access roads to the DUAT, these communities and areas are likely to experience PIIM effects.
 - DUAT fenceline—the fenceline around a Project has the potential to become a hotspot if not properly controlled.
 - R762 between Palma town and Afungi turn-off this road is likely to experience a growth of small commerce and business activities as enterprises seek to be close to the increased traffic flow and Project site.
- Cabo Delgado Province (see Figure 6-2):
 - Mocimboa de Praia—as the primary entry point for workers to the Project (prior to the construction of the Afungi airstrip), Mocimboa de Praia is anticipated to experience some level of PIIM in the early construction period.
 - Communities along the R762—the R762 will serve as the primary transport corridor for goods and workers between Mocimboa de Praia and the project site until such time as the airstrip is complete.
 - Pundanhar—known as a border crossing point between Tanzania and Mozambique, Pundanhar could potentially see an increase in in-migrants as the Project develops, however this will depend on the extent to which in-migrants utilize formal border crossings or cross the border informally..

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- Pemba—the Upstream Operator intends to establish a logistics base in Pemba which has the potential generate further PIIM in the area.
- Yet to be identified locations required to serve as borrow pits.

The extent of PIIM is likely to be greater in the Palma Town and Afungi zones, and these areas will be the primary focus of Project led PIIM management measures. However, PIIM will also be monitored in the identified Cabo Delgado locations as appropriate.

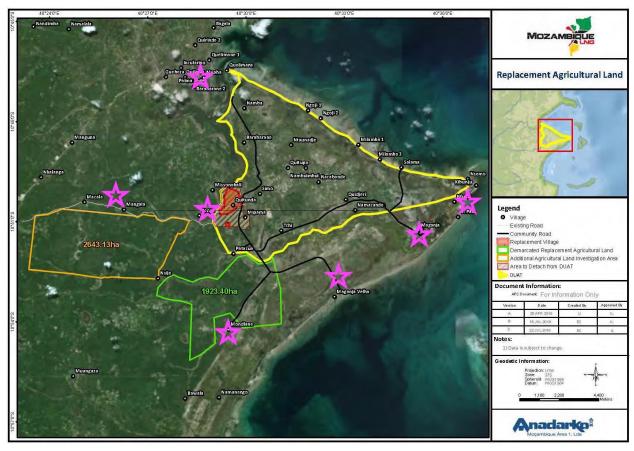


Figure 6-1: Afungi Area Potential Hotspots (Pink Stars)



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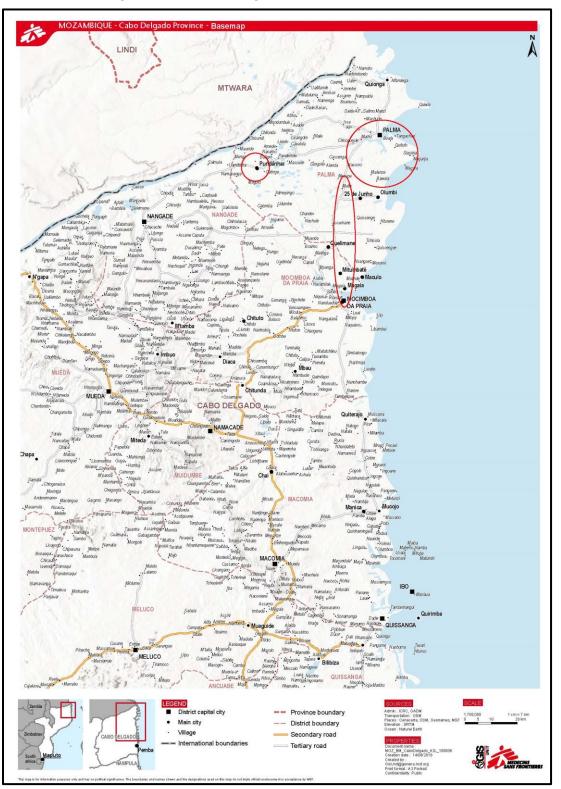


Figure 6-2: Cabo Delgado Hotspots (Red Circles)



7. PIIM STRATEGIES AND MANAGEMENT MEASURES

7.1. PIIM Strategies

EMML will manage PIIM through two distinct strategies. The first strategy seeks to minimize the level of PIIM which is generated by EMML, while the second is focused on managing the impacts of the PIIM which occurs.

As noted in Section 6, the scale of PIIM and the impacts it can cause are influenced by a wide range of EMML decisions and actions across a vast array of topics. It must also be noted that the extent to which the EMML can control and manage PIIM will be affected by the extent to which AMA1 and the Government of Mozambique are supportive of the management measures adopted by EMML and reinforce these practices in their own activities. EMML will seek to work collaboratively with AMA1 to align PIIM strategies, mitigation measures and engagement with the Government of Mozambique on these topics.

A number of the PIIM management measures identified below are also identified as management measures in other management plans. They have been included in this Plan to ensure a comprehensive presentation of PIIM management is elaborated in this Plan, and to allow for an overview of all proposed management measures. To better explain the proposed measures, each topic is described in narrative form with Table 7-2 summarizing the management measures and the persons' responsible for implementing them.

7.2. Strategy #1 – Minimizing the Incentive for In-Migration

7.2.1. Recruitment Practices

EMML is committed to maximizing work opportunities for Mozambican citizens, and will prioritize citizens from Affected Communities in all job categories where possible. However, with a peak anticipated Mozambican workforce of 5,000 during the construction phase (in addition to the demand for unskilled labor for the AMA1 project), the supply of unskilled labor will almost certainly exceed demand, even in the absence of PIIM. Management of employment expectations and clear communication of recruitment procedures and requirements will form a critical basis to reduce the incentive for PIIM. The following measures will be taken to manage employment expectations and to reduce the risk of in-migrants moving to Palma District and surrounds to seek work:

- EMML will prioritize citizens from Affected Communities for all jobs, to the extent possible. Recruitment lists will be developed by EMML, working with the District-level Government to identify individuals who are long term residents of, or originate from, Affected Communities. Specific communities in the Area of Influence (AoI) are Quitupo (Replacement Village), Senga, Mondlane, Maganga, and Palma-Sede. The next tier of communities for recruitment of unskilled labor is the communities along the National Highway (R762) down to the turnoffs to the Afungi peninsula. These lists will be validated by at least two village leaders in each community. Included in the list will be a summary of any specific skills held by the individual, e.g., driving license; ability to speak Swahili / Portuguese / English; experience working in construction on other projects etc. All EMML recruitment activities will search through these lists prior to expanding the search beyond Affected Communities.
- Recently arrived in-migrants who settle in Affected Communities will not be eligible to join the list of prioritized workers. They will receive no priority for consideration of jobs, and will be treated in the same manner as job applicants living in other parts of the country. This will be



widely communicated by EMML to increase understanding within the community. It will also be shared with communities which are understood to form "labor-sending areas". These may include the border regions of Tanzania / Mozambique and the inland districts of Cabo Delgado.

- Specific recruitment points for Mozambican workers will be established, both at national and local levels. Critically, no recruitment will be undertaken at the EMML site, or at the site of any of the contractor-led activities.
- In addition to the list of potential workers from Affected Communities, local level recruitment will be undertaken in Palma town and in Mocimboa de Praia town, on an established schedule.
- Persons residing in the Project area, and not a legal citizen of Mozambique will not be eligible for recruitment as a "Mozambican worker" despite being resident in the local area; such individuals will only be considered for work as a "foreign worker" upon approval of the Government of Mozambique for recruitment of foreign labor.
- EMML, in collaboration with AMA1, is providing support to the Government of Mozambique to issue national identity cards to current residents of Palma District.
- In the event that the level of skill available in the Affected Communities and in the local area is insufficient to meet all EMML needs, recruitment for national semi-skilled and skilled workers will be undertaken in the towns of Pemba, Tete, Beira, and Nampula, and in Maputo. Electronic applications for posted jobs will also be accepted, with applicants travelling to one of the recruitment centers for an interview, as appropriate.
- EMML will develop communication notices to be distributed throughout Cabo Delgado Province, and potentially into surrounding Provinces and countries, explaining the eligibility requirements for work on the Project, the timing of expected opportunities, the scale of potential opportunities, and the process for application. These communication notices will make it clear that in-migrants will not receive any preferential recruitment treatment by moving to the Project area.

7.2.2. Contracting Practices

EMML is committed to maximizing the participation of Mozambican suppliers. In order to minimize the risk of unsolicited and / or informal suppliers setting up businesses in proximity to the Project in the hope of gaining contracts, the following measures will be implemented:

- EMML will distribute the message that EMML required goods and services will not be purchased informally at EMML camp sites or work locations, and that goods and services will only be procured through formal contracts via approved suppliers.
- Preference will be awarded to Mozambican owned suppliers when considering contract award for identified contracting opportunities.
- No selection preference will be awarded to Mozambican contractors bidding for contracts who reside in Cabo Delgado, as compared to those who reside in other parts of Mozambique.

The measures described above are targeted towards larger contract opportunities and do not affect EMML's commitment to support local suppliers to participate in small business opportunities through small and medium scale enterprise development initiatives.

7.2.3. Camp Management and Workforce Accommodation

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Management of workforce accommodation can be a significant lever in the management of PIIM. All non-local workers (i.e. workers who were not living within an hour's drive of the Project prior to the commencement of the Project) will be required to live in camp accommodation. Local workers (i.e. workers coming from villages within a 1 hour drive from the Project) will be encouraged to continue to reside in their home village within Palma District, and will commute on a bus-in busout arrangement managed by EMML.

Large workforce camps can provide an attraction for PIIM, with in-migrants hopeful that they can conduct commercial activities with camp residents, and potentially gain preferential access to work through personal relationships. To minimize this risk, the Project's construction camp, and to the extent possible and practical, the camps of associated contractor workforces, will be located within the DUAT and will be operated as "closed" camps. Further details of accommodation measures are defined below:

- The camp required to accommodate the construction workforce will be operated as a closed camp for expatriates, other country nationals (OCNs) and national workforce on a rotational work schedule. The camp will be located within the DUAT area. Workers shall be strictly prohibited from leaving camps for non-work related activities and from interacting with the local community unless agreed by EMML and approved by the Community Relations team
- The camp will be located in such a position as to allow a clear area of land between the camp and the security fence (at least 100m). Land between the camp and the fence line of the DUAT will be developed to limit its use and to minimize the incentive for fence line communities to develop. Potential land uses for this "buffer zone" will include storage areas for camp supplies; septic systems; and / or "greenbelts"
- The camp will be designed to include adequate recreational, leisure and sporting facilities, activities and programs for workers to ensure workers have options for keeping themselves occupied during leisure time. This will reduce the temptation to leave the camp during leisure time
- All camp residents will undergo a camp induction during which time the specific meaning of a "closed camp" will be explained and the disciplinary consequences of breaking camp rules defined. Camp residents found to be leaving the camp and entering the community without authorization will be subject to a three-strike disciplinary system, after which time they will be dismissed for cause
- EMML will engage with AMA1 to progressively convert all controlled camps to closed facilities, located within the DUAT or other controlled access zones
- Workforce accommodation will be managed to ensure sufficient supply of beds and other facilities in advance of any recruitment drives for EMML. Under no circumstances will EMML allow non-local workers or contractors to live in host communities
- EMML has adopted policies to discourage the use of cash within the Project site to minimize the attractiveness for informal commercial transactions between Project workers and opportunistic business enterprises near the camp perimeter.



7.2.4. Eligibility for Resettlement and Compensation

In order to develop onshore facilities, land acquisition and resettlement activities are being undertaken by AMA1 on behalf of Area 1 and Area 4 projects. Physical and economic displacement under the approved Resettlement Action Plan is occurring within the DUAT, replacement village location, and livelihood development zone (replacement agricultural land). In addition to these areas, resettlement impacts may also be generated by road developments, quarries, borrow pits, laydown and staging yards, fabrication areas, and truck rest stops outside the DUAT. Resettlement projects can be at risk of opportunistic in-migration as individuals and families attempt to gain opportunistic eligibility to compensation measures and relocation benefits through moving to the area once it is understood that the area may be affected. The following measures have been, and will continue to be applied to reduce this risk:

- AMA1, in coordination with the GoM, have established a cut-off date for eligibility in the compensation process. Announcement of the date was made by the Palma District Administrator, with clear messages provided to communities about the meaning of the cutoff date, including the fact that after the cut-off date, new house construction, new planting of trees and perennial crops, and allocation of land for housing or agriculture to individuals or households will not be eligible for compensation.
- Once an area has been identified as requiring resettlement, efforts will be made to restrict information sharing about the location until such time as resettlement planning is ready to commence. This will reduce the risk of opportunistic in-migration in advance of the cut-off date.
- AMA1 and EMML will engage with community leaders in all host communities (i.e. communities which will host resettled populations or will allocate land for the livelihood development zone) to discuss the importance of managing their community land and limiting allocations of land to in-migrants in order to protect the well-being of their own community. This will be achieved through "social mapping" of communities in terms of land availability, food production and future population expansions if they allocate significant areas of land to in-migrants.

7.2.5. Site Access

The Project has been allocated a DUAT of approximately 6, 500 ha in the Afungi Peninsula in which the Project will be developed. Access to the site will be restricted to Project personnel only, and will be controlled through fences with appropriate security access measures and procedures. Access to the RV which is outside the DUAT boundary will not be controlled, in line with freedom of movement rights afforded to all citizens.

7.2.6. Transport and Logistics

During the construction phase, significant volumes of material will need to be transported within Cabo Delgado to support the development of the Project. This will include transport by road, docking of equipment by ship at a Marine Offloading Facility (MOF), and transport of material by plane. Many of the facilities required to support this logistical effort will need to be developed by the Project early in the Construction period (e.g., construction of the airstrip at the Project site, and development of a MOF). In advance of the development of the MOF and airstrip, the Project will be heavily reliant on existing (and improved) road infrastructure and the use of trucks to mobilize materials. While all aspects of a logistical chain can offer incentives for in-migration due



to anticipated jobs and economic opportunities, extensive trucking networks can present elevated risks due to the need to control the behaviors of numerous individual truck drivers across considerable distances. The following management measures will be adopted to minimize the incentive for PIIM generated by transport and logistics activities:

- In advance of the development of the Project airstrip, the Project will rely on an airport in Mocimboa de Praia to bring workers to the Project. EMML will avoid, to the extent possible, allowing workers to overnight in Mocimboa de Praia when making connections to and from site.
- The Project will also rely on Pemba as a logistics landing point for both workers (air) and for goods (ship). Given the greater size of Pemba, and the developed tourism infrastructure in the city, the risk of PIIM attributed to this Project alone is lower, however, EMML will also apply caution when selecting where to accommodate workers and how to manage their lodging arrangements.
- All workers undertaking vehicle journeys outside the DUAT will be required to register a journey management plan. Within this plan, the driver will be required to identify where they plan to stop for fuel, food, and sleep (as necessary) during their journey, during their rest at the arrival destination, and (as applicable) on their return journey. All journey management plans will be subject to review and approval by the Logistics team.
- Truck drivers will be required to stop at previously approved truck stops. These Project truck stops will be controlled locations, where drivers can eat, rest, and refuel. Drivers will not be permitted to leave the controlled truck stop area, and interaction with roadside communities will not be permitted.
- All truck drivers will be supplied with sufficient food and beverages to complete their journey without needing to stop at roadside convenience stalls.
- EMML employees will be required to sign and agree to operate in accordance with an EMML Code of Conduct. The Code of Conduct will specifically prohibit external fraternization of EMML workers and community members.

7.3. Strategy #2 – Managing the Impacts of PIIM

Recognizing that despite efforts to minimize PIIM, it is likely that PIIM will occur (and in connection to AMA1, PIIM already has occurred), this strategy is focused on managing the impacts generated by PIIM.

7.3.1. Managing Access in Project Controlled Areas

As outlined in Section 7.2.4, resettlement is being undertaken to support the development of the Project. The primary area to be resettled is within the DUAT, and once households have been moved to the RV, and lands have been replaced in the LDZ, access to former land holdings and houses will be prohibited. MZLN-EL-RPPLN-00-0004 – DUAT Encroachment Plan has been developed to specifically address how encroachment onto Area 4 allocated areas within the DUAT will be managed. The key management measures from that plan are captured below, along with additional measures relevant at a Project level:

• As resettlement nears completion, a perimeter fence will be installed jointly by Areas 1 and 4 on behalf of RBLL. The perimeter fence is intended to be installed as close as practical to the boundaries of the LNG Industrial Area DUAT and will run adjacent to the community



access roads that the Resettlement Team will be installing per the Resettlement Plan. The perimeter fence is intended to provide a physical barrier which will help to mitigate encroachment on the DUAT

- EMML and Contractors will steward those areas that it controls in such a manner to prevent encroachment on a cleared area. Stewardship will be undertaken in a manner consistent with the following principles:
 - Community engagement, education and awareness raising will be key tools to reduce the likelihood of encroachment, and to manage encroachment if it occurs
 - EMML will work closely with the District Administrator and the authority of that office to encourage opportunistic settlers to move out of the area voluntarily
 - Where encroachment occurs, emphasis shall be placed on voluntary relocation, with legal measures only used as a last resort
 - "Legal eviction" will be carried out in accordance with national legislative requirements, and in compliance with IFC PS5 requirements. Where eviction is required, EMML will coordinate with the Government to implement these proceedings
 - EMML will implement effective surveillance systems such that any opportunistic settlement will be identified within a seven-day window
 - Boundary markers and signage will be used by EMML to clearly delineate areas in which access is prohibited
 - Community paths will be developed and maintained by EMML around the DUAT to reduce the incentive for individuals to walk through the DUAT. New or additional paths and roads outside the DUAT will be supported by the Project through both the Resettlement and Community Development Support programs to ensure communities retain access to shoreline and agricultural areas.

7.3.2. Building Capacity in Affected Communities

Communities themselves are typically the most effective managers of PIIM, both in its scale and its impact. Typically, the smaller the community, the greater the level of control they can apply over who resides in their community and how land is allocated. This control tends to decrease as the size of the community increases. As communities reach the size of towns or cities, such as Palma and Mocimboa de Praia, population planning moves from being an activity largely controlled by village leaders to one predominantly led by administrators, with controls shifting from leadership to legal mechanisms.

EMML recognizes the critical role in PIIM management which needs to be played by affected communities, and will implement the following measures to support communities to undertake this role:

• EMML, in coordination with AMA1, will engage with the Government at District and Provincial levels to understand the development plans which have been designed for the Palma District and surrounds. Existing plans are known to include a Master Plan development, covering an area of 18,000 ha to support industrial development. Through working with the Government, EMML and AMA1 will seek to ensure that any PIIM measures which are implemented are consistent with approved Government plans.



- EMML will engage with village leaders and administrators in all Affected Communities to discuss PIIM, how it can be minimized, and how to manage it if / when it occurs. Topics to be covered are described further in Section 7.2.4, however they will specifically include the importance of controls which are held by community leaders and the risks to host communities associated with uncontrolled in-migration.
- With significant changes to a population, there is a risk that the capacity of existing physical and social services will be exceeded due to increased demand. EMML will work with Affected Communities to identify physical and social services which may be in need of additional support in each specific community. Specific services which will be considered will include: health services; education services; water and sanitation services; road and transport connections; and community infrastructure (e.g., community centers).
- Where the capacity of existing services and / or infrastructure is in need of expansion or support to meet increased demand, EMML will work with the Affected Community to determine how best to meet the increased demand without creating a "honey pot" to attract additional in-migrants. Support will be channeled through the Resettlement Team and the Community Development Support team depending on the location of the Affected Community.
- EMML will work with community leaders (both village leaders and town / district administrators) to identify additional training / planning support which could build the capacity of these leaders to manage PIIM. Opportunities to establish visits for community leaders to areas affected by PIIM related to other projects (e.g., mining areas around Tete) to gain direct experience of the impacts of PIIM will be considered.

7.3.3. Managing Specific PIIM Related Impacts

The introduction of a significant number of in-migrants into small and relatively isolated communities can have a range of adverse impacts. Primary amongst these can be impact to community health, social structures, and traditions. The following measures will be implemented to specifically address these impacts:

- EMML will implement an HIV/AIDS prevention and awareness raising program for the Project workforce (as per Mozambican law). This program will also develop "take home" messages that workers can share with their family members.
- EMML will work with health partner organizations in Palma, Mocimboa de Praia, and Pemba Districts to implement HIV/AIDS prevention, awareness, and testing programs for these areas. This will likely include support for mobile campaigns visiting rural or more remote areas outside the major population centers.
- Medical screening will be conducted for all Project workers prior to commencement of work to identify any communicable diseases which could be transmitted to the local population. Potential employees with communicable diseases will be expected to undergo treatment to restrict transmission of these diseases before commencing work on the Project.
- The introduction of new residents to a relatively remote area has the potential to increase the prevalence of existing communicable diseases and potentially introduce new diseases previously unobserved in these communities. EMML will work with the Ministry of Health and the health service providers in Palma and Mocimboa de Praia Districts to monitor disease trends and support management controls as necessary.



- To reduce reliance on existing health care facilities, all Project workers will have access to the Project's medicine and occupational health facilities for their health needs. This will not, however, cover the family members of resident workers, nor in-migrants who move into the Project area. To the extent that health service delivery demand expands and service capacity is exceeded, EMML will work with the Ministry of Health and the health service providers in Palma and Mocimboa de Praia Districts to support service expansion through the Community Development Support programs.
- As populations expand, water quality and quantity in communities can be affected. This can
 occur both through increased demand for a limited supply and through inadequate hygiene
 and sanitation practices affecting existing water quality. EMML, through the Community
 Development Support program will work with Affected Communities to increase water supply
 as necessary and to raise awareness about sanitation and hygiene practices. This
 awareness will specifically target topics related to the prevention of open defecation,
 separation of animals from potable water sources, and management of putrescible and hard
 waste.
- As the population expands, increased pressure may be exerted on ecosystem services and existing natural resources, e.g., agricultural land, forest areas, fishing areas, shoreline seafood collection zones and land or resources supporting or providing ecosystem services, including sourcing of fuelwood and / or charcoal. EMML will engage with Affected Communities to help them understand the need to protect their food producing land (and to understand the long-term community costs of selling or renting land or marine resources to in-migrants) and ecosystem services. A reduction in available land is inevitable due to the footprint of the Project and the PIIM which has already occurred, and EMML will seek to support communities to increase their productivity from existing resources through the Community Development Support program. PIIM considerations will inform the design of EMML's approach to biodiversity protection and required offsets. EMML will also work with livelihood development initiatives and community organisations to support natural resources management activities targeting the roll-out of sustainable cooking fuel methods and sources.
- All EMML workers and visitors will be required to sign a Code of Conduct committing them to certain behaviors when on the Project site and when travelling for the Project. These behaviors will include, but not be limited to:
 - Prohibition of external fraternization with non-resident Project employees, contractors and visitors with the local communities
 - Prohibition of open defecation / urination by Project workers when working at a distance from fixed toilet facilities
 - Prohibition of violence (including domestic violence) and other threatening behavior both on site and in the broader community
 - Acknowledgement of and respect for traditional leadership, customs, values, scared sites, and practices within host communities.
- EMML will develop specific anti-domestic violence programs and other initiatives to reduce the emergence of social ills. These programs will be developed to incorporate "take home" messages for workers to transmit back to their families and friends.



- The introductions of both a large non-local workforce and non-local in-migrants collectively
 have the potential to affect traditional roles and cultural practices within communities. The
 Code of Conduct referenced above will reduce the direct impact caused by Project workers
 on these roles and practices, however shifting community dynamics are anticipated from the
 introduction of a significant younger generation earning incomes in predominantly
 subsistence communities. To manage these impacts, EMML will engage with traditional
 community leaders to help them understand the changes which are likely to occur and how
 to best manage those changes. This is likely to include providing support for the development
 or capacity building of youth committees, and women's committees within village structures.
- To the extent that PIIM hotspots develop, with a concentration of in-migrants grouping together in a specific area, the Project will engage with the in-migrants to ensure they understand their rights and EMML policy in terms of access to employment and contracting opportunities.

7.3.4. Stakeholder Engagement

Engagement with stakeholders is vital in effectively managing PIIM. A key element to the management of PIIM will be supporting the establishment of a multi-stakeholder forum (MSF), in which EMML, AMA1, district and provincial government representatives and the donor community, amongst others, will be able to discuss PIIM and agree plans to manage it in a coordinated manner. The MSF will be the primary vehicle to address urban and spatial planning considerations in Palma Town and District and broader economic development initiatives in Cabo Delgado.

EMML will also work with AMA1 to define areas of PIIM management which can be implemented jointly, and will seek to align PIIM mitigation measures and approaches.

Specific critical stakeholders will include local communities as identified in the scope of this Plan, District, Provincial, and National level Government, AMA1, and in-migrant groups (to the extent that such groups have formed in the area). Table 7-1 summarizes the key messages to be conveyed to each stakeholder group.



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Stakeholder Group	Topics for Engagement	Tools	Frequency
Project-affected Communities	 Awareness raising about PIIM, potential impacts, and avoidance / reduction / mitigation requirements Encouraging awareness of community members and their leaders on land law and community custody and control of territory Encouraging community self- policing and leadership on PIIM by community leaders Approaches to avoid / reduce / mitigate adverse PIIM impacts Appropriate traditional methods for discouraging the arrival of outsiders into a community Clarification on 'local' in Project local hiring and the dilution of opportunity by allowing others to settle in the community The usefulness of village population registers Traditional leadership and the resolution of tensions within the community Raising awareness of local culture, promoting inter- cultural understanding of in- migrants Attractiveness of informal types of work, including sex work Community health messaging around communicable disease, hygiene and sanitation, and social ills Monitoring of PIIM impacts. 	 Meetings with village leadership / Community Development Associations / Committees / Households Public meetings Focus Group Discussions Newsletters Road show campaigns in the communities; Use of community radios / newsletters / community engagement to disseminate information on encroachment implications, etc. 	Quarterly, or, as needed

Table 7-1: Topics Covered in Stakeholder Engagement



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Stakeholder Group	Topics for Engagement	Tools	Frequency
Palma Town, Mocimboa de Praia Town and Pemba	 Awareness raising about PIIM, potential impacts, and avoidance / reduction / mitigation requirements Working with community administrators to support town planning and engage in Master Plan development Approaches to avoid / reduce / mitigate adverse PIIM impacts Appropriate traditional and administrative methods for discouraging the arrival of outsiders into a community Clarification on 'local' in Project local hiring and the dilution of opportunity by allowing others to settle in the community Development of national ID cards for Palma District residents Raising awareness of local culture, promoting inter- cultural understanding of in- migrants Attractiveness of informal types of work, including sex work Community health messaging around communicable disease, hygiene and sanitation, and social ills Monitoring of PIIM impacts, including local inflation and service availability. 	 Public meetings Focus Group Discussions Newsletters Road show campaigns in the communities Use of community radios / newsletters / community engagement to disseminate information on encroachment implications, etc. 	



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Stakeholder Group	Topics for Engagement	Tools	Frequency
Palma District and Cabo Delgado Provincial Governments	 Awareness raising about PIIM, potential impacts, and avoidance / reduction / mitigation requirements Monitoring of PIIM impacts (e.g., inflationary prices, availability of government services, housing density, etc.), their assessment, and potential responses to adverse impacts Discussion of the observed extent and actual impacts of PIIM Land use planning in Palma District – in particular Palma Town and the Palma-Afungi Access Road – this may also include topics such as the monitoring and necessity of growth of social services, in particular education, health, security; and the availability of plots of land for new arrivals Delineation of responsibilities to manage PIIM including individual and joint approaches to address PIIM impacts, mitigations, and management. 	 Presentations Meetings and discussions Multi-stakeholder forum 	Quarterly or as needed
Central Government	 Awareness raising about PIIM, impacts and avoidance / reduction / mitigation requirements 	 Presentations Meetings and discussions 	Annually
Multi- stakeholder forum	 Regional development planning for Cabo Delgado and Palma District specifically 	 Meetings and discussions 	Quarterly or as needed
	 Spatial planning initiatives in the Palma Town and Afungi areas 		
	 Urban planning for Palma Town, including impacts assessments for services and utilities based upon anticipated population growth. 		



In addition to the key stakeholders identified in Table 7-1, EMML will also engage with organizations focused on immigration assessments (including cross-border movements) and town planning. These will include, but not be limited to the following organizations:

- International Organization for Migration (IOM)
- Cities Alliance
- World Bank

7.3.5. Monitoring PIIM Impacts

Monitoring of impacts is generally not considered to be a "management measure" but rather a tool to observe the effectiveness of a management measure. However, in managing PIIM, it can be argued that due to the level of uncertainty around how impacts will unfold, and therefore where to target responses, monitoring plays a critical role as a management measure in its own right. For this reason, it is included as a management measure in this Plan. A specific PIIM monitoring and evaluation procedure will be developed in collaboration with AMA1 to accompany this Plan, however the key areas in which monitoring will occur are identified below. Specific indicators for each area will be defined in the Monitoring and Evaluation Procedure, as will the frequency and duration of monitoring and evaluation campaigns.

- Population changes:
 - Observations from community reports
 - Observations from community relations team members
 - Aerial photography which identifies houses and settlement expansions
 - Population changes as recorded through community surveys
 - Vehicle counts along key access roads
 - Observations of changes in ethnic groups / proportions as reported by Community Relations team.
- Land-use changes:
 - Aerial photography and identifiable changes to land-use
 - Security reports identifying attempted encroachment on the DUAT and general reports on law and order statistics
 - Number of road-side stalls which have developed along the fenceline of the Project area and along specific Project access roads
 - Physical expansion of towns and cities.
- Community health:
 - Disease trends recorded and reported at both the Project clinic and also at health clinics and hospitals in the AoI. Specific diseases of interest will include:
 - HIV/AIDS and other STDs
 - Tuberculosis



- Outbreaks of new / previously low-level communicable diseases
- Changes to the trend of sanitation related illnesses (e.g., cholera, dysentery, diarrhea etc.).
- Number of patients presenting to identified clinics and hospitals and the nature of their health complaints.
- Education:

Statistics relating to student attendance at identified schools.

- Livelihood Restoration and Inflation:
 - Indicators developed to measure livelihood restoration as part of the Resettlement program
 - Pricing changes for standard basket of goods
 - Number of new trade stores of shops which develop within specific communities
 - Changes in the availability of rental accommodation in towns, and the value of the rent
 - Changes in the land market in the AoI and in the towns of Palma and Mocimboa de Praia.
- Social trends:
 - Law and order complaints registered by Police or through EMML grievance mechanism
 - Changes to the prevalence of illegal activities occurring in the communities (e.g., prostitution).
- Grievances:
 - Specific grievances related to PIIM
 - Grievances related to land availability and food security
 - Grievances related to community health challenges
 - Grievances related to social ills and / or community tensions with in-migrants
 - Grievances related to concerns over recruitment and contracting selection processes and eligibility of applicants.

7.3.6. Summary of Mitigation Measures

Table 7-2 provides a summary of all mitigation measures with responsibility for implementation identified for each measure.



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Strategic Theme and Sub-theme	Risk / Impact to the community	Mitigation Measure	Responsibility	
Minimizing the incentive for in-migration				
Practices		Prioritization of citizens from Affected Communities for all jobs.	Contractor	
		Development and regular updating of "recruitment lists" to identify individuals who are long-term residents of or originate from Affected Communities. Recently arrived in-migrants who settle in Affected Communities will not be eligible to join the list of prioritized workers.	EMML Community Relations Team	
		Establishment of specific recruitment points for Mozambican workers at local and national levels, with no recruitment undertaken at the Project site or at any of the contractor-led activities.	Contractor	
		Provision of support to the Government of Mozambique to issue national identity cards to residents of Palm District.	EMML Community Relations Team	
		Establishment of electronic job application process for semi-skilled and skilled positions, accessible by all Mozambican citizens, with recruitment centers in Pemba, Tete, Beira, Nampula, and Maputo.	Contractor	
		Communication notices will be distributed throughout Cabo Delgado Province explaining eligibility requirements, processes, and opportunities for work on the Project.	EMML Community Relations Team	
Contracting Practices	Potential for unsolicited or informal suppliers setting up businesses in proximity to the project in the hope of gaining contracts.	Communication notices will be distributed throughout Cabo Delgado Province and other Provinces (as necessary) explaining that project goods and services will not be purchased informally at Project camp sites or work locations and that goods and services will only be procured through formal contracts via approved suppliers.	Contractor and EMML Community Relations Team	
		Preference will be awarded to Mozambican owned suppliers when considering contract award	Contractor	
		No selection preference will be awarded to Mozambican contractors bidding for contracts who reside in Cabo Delgado, as compared to those who reside in other parts of Mozambique	Contractor	

Table 7-2: Summary of PIIM Mitigation Measures



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Strategic Theme and Sub-theme	Risk / Impact to the community	Mitigation Measure	Responsibility
Camp Management and Workforce Accommodation	Large workforce camps can provide an attraction for PIIM, with in-migrants hopeful they can conduct commercial activities with camp residents and potentially gain preferential access to work through personal relationships.	All non-local workers will be required to live in camp accommodation and camps will be operated as "closed camps." Workers will be prohibited from leaving camps for non-work related activities and from interacting with local communities unless agreed by the Project and approved by the Community Relations Team.	Contractor
		Project will provide bus-in bus-out transport arrangements for all local workers (residing within 1 hour of the Project site).	Contractor
		Workforce accommodation for workers and major contractors will be provided in a camp located within the DUAT areas. The camp will be located to allow a clear area of land of at least 100 m between the camp and the security fence.	Contractor
		The camp will be designed to include adequate recreational, leisure and sporting facilities, activities and programs for workers.	Contractors
		Camp inductions will be mandatory for all camp residents and disciplinary consequences of breaking camp rules will be explained in the camp induction.	Contractor
		Project will engage with AMA1 to progressively convert all controlled camps to closed facilities, located within the DUAT or other controlled access zones.	EMML
Eligibility for Resettlement and Compensation	Opportunistic in-migration or encroachment seeking to gain compensation for physical and / or economic displacement.	Cut-off date for eligibility in the compensation process has been established, and the date was announced by the Palma District Administrator. Houses or assets built or grown post the cut-off date will not be eligible for compensation.	Resettlement Team
		Information sharing about replacement land options will be restricted until such time as land ownership is secured to minimize speculative activity.	Resettlement Team
		AMA1 and EMML will engage with community leaders in all host communities to discuss the importance of managing their community land and limiting allocations of land to in-migrants.	Resettlement Team



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Strategic Theme and Sub-theme	Risk / Impact to the community	Mitigation Measure	Responsibility
Site Access	Opportunistic in-migration and re-development of cleared areas if cleared land is not secured.	Access to the fenced site area within the DUAT will be restricted to Project personnel only and will be controlled through fences with appropriate security access measures and procedures.	Security
Transport and Logistics	In advance of the development of the MOF and the airstrip, the project will be heavily reliant on existing (and improved) road infrastructure and the use of trucks to mobilize	EMML will avoid, to the extent possible, allowing workers to overnight in Mocimboa de Praia when making connections to and from the site.	Contractor
		The Project will apply precautionary principles when accommodating workers in Pemba.	Contractor and EMML
to the presence of numerous truck drivers	trucking networks can present elevated risks due to the presence of numerous truck drivers and an extended footprint of	All workers undertaking vehicle journeys will be required to register a journey management plan, identifying where they plan to stop for fuel, food and lodging (as necessary). All journey management plans will be subject to review and approval by the Logistics team.	Contractor and EMML
		Truck drivers will only be permitted to stop at approved truck stops, which will be controlled locations where drivers can eat, rest and refuel. Interaction with roadside communities will not be permitted.	Contractor
		All truck drivers will be supplied with sufficient food and beverages to complete their journey without needing to stop at roadside convenience stalls.	Contractor
		All Project employees and contractors will be required to sign and agree to operate in accordance with a Project Code of Conduct, which specifically prohibits external fraternization of Project workers and community members.	Contractor and EMML
Managing the Imp	acts of PIIM		
Managing access in Project controlled areas	Potential encroachment onto the DUAT fenced areas post-resettlement.	Construction of a perimeter fence around the LNG Industrial Area in line with the specifications outlined in the Resettlement Action Plan (RAP)	Resettlement Team
		Community engagement, education and awareness raising will be undertaken to reduce the likelihood of encroachment and to manage encroachment if it occurs	EMML Community Relations Team
		Project will work closely with the District Administrator and the authority of that office to encourage opportunistic settlers to move out of the area voluntarily	Resettlement Team
		Where encroachment occurs, emphasis shall be placed on voluntary relocation with legal measures only used as a last resort	Resettlement Team



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Strategic Theme and Sub-theme	Risk / Impact to the community	Mitigation Measure	Responsibility
		"Legal Eviction" will be carried out in accordance with national legislative requirements and in compliance with IFC PS 5 requirements. Any eviction proceedings will be coordinated with the Government.	Resettlement Team
		The Project will implement effective surveillance systems such that any opportunistic settlement will be identified within a seven-day window	Security and Community Relations Team
		Boundary markers and signage will be used by the Project to clearly delineate areas in which access is prohibited.	Contractor
		Community paths will be developed and maintained by the Project around the DUAT to reduce the incentive for individuals to walk through the DUAT. New or additional paths and roads outside the DUAT will be supported by the Project through both the Resettlement and Community Development Support programs to ensure communities retain access to shoreline and agricultural areas.	Resettlement Team and EMML Community Development Support Team
Building Capacity in Affected Communities	Communities are typically the most effective managers of PIIM, hence through building community capacity, PIIM management efforts can be enhanced.	Project, in coordination with AMA1, will engage with the Government at District and Provincial levels through a Multi- stakeholder forum to understand the development plans which have been designed for the Palma District and Cabo Delgado Province.	EMML Community Relations Team
		Project will engage with village leaders and administrators in all Affected Communities to discuss PIIM, how it can be minimized, and how to manage it if / when it occurs.	EMML Community Relations Team
		The Project will work with Affected Communities to identify physical and social services which may be in need of additional support as a result of PIIM in each specific community. Specific services which will be considered will include: health services, education services, water and sanitation services, road and transport connections, and community infrastructure.	EMML Community Development Support Team
		The Project will work with District Administrators and donors through the MSF to determine how best to meet increased demand for services or infrastructure whilst avoiding the creation of a "honey pot" to attract additional in- migrants.	EMML Community Development Support Team



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Strategic Theme and Sub-theme	Risk / Impact to the community	Mitigation Measure	Responsibility
		The Project will work, through the MSF, with community leaders and town / district administrators to identify additional training / planning support which could build the capacity of these leaders to manage PIIM.	EMML Community Development Support Team
Managing Specific PIIM Related Impacts	Introduction of a new and expanded population due to the arrival of project induced in-migrants	The project will implement an HIV/AIDS prevention and awareness raising program for the Project workforce (as per Mozambican law). This program will include "take home" messages that workers can share with their family members.	Contractor
		The Project will work with health partner organizations in Palma, Mocimboa de Praia, and Pemba Districts to implement HIV/AIDS prevention, awareness, and testing programs for these areas.	EMML Community Development Support Team
		Medical screening will be conducted for all Project workers prior to commencement of work to identify any communicable diseases which could be transmitted to the local population.	Contractor
		The Project will work with the Ministry of Health and the health service providers in Palma and Mocimboa de Praia Districts to monitor disease trends and support management controls as necessary.	EMML Community Development Support Team
Managing Specific PIIM Related Impacts (cont'd)		All Project workers will have access to the Project's medicine and occupational health facilities for their health needs.	Contractor
		The Project will work with the Ministry of Health and the health service providers in Palma and Mocimboa de Praia Districts to support service expansion for areas where health service capacity is exceeded due to in-migration.	EMML Community Development Support Team
		The Project will work with Affected Communities to increase water supply as necessary and to raise awareness about sanitation and hygiene practices in areas affected by PIIM.	EMML Community Development Support Team



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Strategic Theme and Sub-theme	Risk / Impact to the community	Mitigation Measure	Responsibility
		The Project will engage with Affected Communities to help them understand the need to protect their food producing land and ecosystem services, and to support communities to increase the productivity of existing land and protect areas of ecosystem service or biodiversity value. The Project will also support efforts to minimize adverse impacts to areas of high biodiversity value in onshore, nearshore and offshore zones. This will likely involve supporting livelihood development initiatives targeting sustainable natural resource management and supporting alternate sustainable fuel sources.	EMML Environment Team
		 All Project workers and visitors will be required to sign a Code of Conduct committing them to certain behaviors when on the Project site and when travelling for the Project. These behaviors will include, but not be limited to: Prohibition of external fraternization with non-resident Project employees, contractors and visitors with the local communities; Prohibition of open defecation / urination by Project workers when working at a distance from fixed toilet facilities; Prohibition of violence (including domestic violence) and other threatening behavior both on site and in the broader community; and Acknowledgement of and respect for traditional leadership, customs, values, scared sites and practices within host communities 	Contractor and EMML
		The Project will develop specific anti- domestic violence programs and other initiatives to reduce the emergence of social ills.	Contractor and EMML
Managing Specific PIIM Related Impacts (cont'd)		The Project will engage with traditional community leaders to help them understand the social changes which are likely to occur as a result of PIIM and how best to manage those changes.	EMML Community Relations Team
		To the extent that PIIM hotspots develop, the Project will engage with the in-migrants to ensure they understand their rights in terms of access to employment and contracting opportunities.	EMML Community Relations Team



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Strategic Theme and Sub-theme	Risk / Impact to the community	Mitigation Measure	Responsibility
Stakeholder Engagement	Effective engagement with stakeholders has the potential to deliver improved PIIM management outcomes	Establishment of a multi-stakeholder forum.	EMML Community Relations Team
		Effective engagement as defined in Table 7-1	EMML Community Relations Team
Monitoring PIIM Impacts	Monitoring of impacts and of social changes allows for time efficient and targeted responses to PIIM effects as they manifest.	Development of a specific PIIM Monitoring and Evaluation procedure	EMML Community Development Support Team



8. ORGANIZATION – ROLES AND RESPONSIBILITIES

8.1. Community Relations Team

The Community Relations Team will own this Plan and will be responsible for its updating and revision. They will also be responsible for ensuring the other teams indicated in this Plan are aware of their responsibilities to ensure it is fully implemented.

The Community Relations Team will be tasked with leading both Strategy # 1 – Minimizing the Incentive for In-migration and Strategy #2 – Managing the impacts associated with PIIM. This will specifically include the responsibility to conduct monitoring and engage with affected communities and other stakeholders (as identified in Section 7) in relation to PIIM on a regular basis. The Community Relations Team will be heavily reliant upon the other teams identified in this Plan to support / facilitate the implementation of these strategies.

8.2. Human Resources Team

The Contractor Human Resources Team, or equivalent, will be responsible for the implementation of recruitment practices which will minimize the incentive for in-migration. This will include prioritization of workers who can demonstrate long-term residency in, or originate from, Project Affected Communities, and the establishment of recruitment centers distant from the Project's physical location. The Human Resources Team will also be responsible for ensuring that Contractors apply the same standards when undertaking recruitment.

8.3. Procurement Team

The Contractor Procurement Team will be responsible for the implementation of contracting practices and purchasing arrangements in such a manner as to minimize the risk of unsolicited or informal suppliers establishing businesses in proximity to the Project.

8.4. Camp Management Team

The Contractor Camp Management Team will be responsible for the management of workforce accommodation in such a manner as to ensure sufficient beds for workers, to control access to workforce accommodation and to ensure non-local workers are not required to reside in villages or towns. This team will also work closely with the Human Resources Team and the Transport and Logistics Teams to ensure local workers have access to sufficient transport services to allow them to reside at home and commute to the Project on a daily basis.

8.5. Transport and Logistics Team

The Contractor Transport and Logistics Team will be responsible for the implementation of journey management policies which will define the designated "stopping points" on long-distance trips and set the conditions for interactions between drivers and local communities.

8.6. Medicine and Occupational Health Team

The Medicine and Occupational Health team will be the technical lead in all community health considerations related to PIIM management. They will coordinate the collection and sharing of health data with local health services and administrators, working with the Community Relations Team as necessary.



8.7. Resettlement Team

The Resettlement Team, in coordination with the Security Team, will be responsible for managing potential encroachment onto the DUAT, forced evictions (as necessary) and engaging with host communities to ensure they understand the risks of selling or leasing excessive areas of land.

8.8. Security Team

The Security Team, in coordination with the Community Relations Team, will monitor changes to the population size and profile in hotspot communities. The Security Team will also be responsible for managing and reporting on any security events and will be expected to identify any PIIM related reasons if they are relevant to the conflict.

5.1. Community Development Support Team

The Community Development Support Team will work with the Community Relations Team to identify projects which can increase the capacity of affected communities to manage PIIM.

5.2. Environment Team

The Environment Team, in coordination with the Community Relations Team, will be responsible for the mitigation of direct Project impacts to ecosystems services and biodiversity and will engage with communities and government representatives to seek to minimize indirect impacts on these values associated with PIIM. The Environment Team will also lead work related to the design of residual impact mitigation measures including offset calculations.



9. TRAINING – AWARENESS AND COMPETENCY

All Project personnel that have the responsibility for execution of tasks and requirements in this Plan shall have the necessary competencies, skills, and experience to perform their work. These competencies shall include:

- Knowledge and understanding of PIIM and its associated impacts
- Knowledge and understanding of the Project and activities which may generate opportunistic in-migration
- Language skills across the team to ensure clear communication in Portuguese, Swahili, English, and relevant local languages.

PIIM awareness raising will be included as part of the Project Induction, to ensure all workers (employees and contractors) are aware of their responsibilities to minimize PIIM impacts and reduce the incentive for PIIM to occur. The Project will provide PIIM briefings for Contractors on an as needs basis. Contractors will be required to identify a dedicated point of contact with ultimate responsibility for ensuring they have correctly implemented the requirements of this Plan.



10. **REPORTING**

The EMML's' Community Relations Manager will report PIIM data collected a monthly basis internally. This data will likely include:

- Trends in vehicle reports along key roads
- Observational reports on population changes and service / infrastructure pressure generated by increased population (as reported by the Community Relations team)
- Community grievances related to PIIM
- Security incidents in relation to encroachment and a selection of statistics captured through the Encroachment Management Plan
- Crime statistics for Palma town (if available)
- Health statistics from the Palma Hospital and Senga health center (if available)
- Trend analysis for the price of a "standard basket of goods"—in both Palma town and hotspot villages
- A summary of any actions taken, solely or jointly, to reduce or mitigate PIIM impacts
- A summary of the Project's understanding of PIIM trends and the current hotspots.

A quarterly PIIM report will be prepared for public distribution (to be shared with AMA1 and the Governor of Palma District, amongst others). It will report on similar data to that captured in the monthly report, as well as any additional monitoring indicators as are available (as defined in Section 7). The report will identify areas where collaborative efforts are required to address PIIM challenges.