



## **Influx Management Plan**

**For**

**IEFCL-Train2  
Fertilizer Project**

**INDORAMA ELEME FERTILIZER & CHEMICALS  
LIMITED**

Description	Page no.
Index	2
Abbreviations	2
1. Definitions	2
2. Introduction	3
2.1 Proponent	3
3. Objectives	4
3.1 Scope	4
4. Legal and Other Requirements	4
4.1 National /State Legislation and Policy	4
4.2 IFC Performance Standards	4
5. Accountability and Responsibility	5
6. Impact Management	6

## Abbreviations

Abbreviation	Full Definition
ESMS	Environmental and Social Management System
ESIA	Environmental and Social Impact Assessment
IFC	International Finance Corporation
IMP	Influx Management Plan
PII	Project Induced Influx
PIIM	Project-Induced Influx Management
SSA	Social Study Area
PS	Performance Standard
LGA	Local Government Area
LG	Local Government

## 1. DEFINITIONS

The following definitions are of relevance within this report:

**Social Study Area** – the area where primary social baseline data was collected.

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

## **2. INTRODUCTION**

Indorama Eleme Fertilizer & Chemicals Limited (IEFCL), the Proponent requires an Environmental Impact Assessment (EIA) of the proposed IEFCL - Train 2 (Ammonia and Urea) project within Indorama Complex. The Proponent wishes to ensure that the project is carried out fully in line with world class policy statements on HSE, Nigerian and International legislative requirements, including World Bank/IFC standards. These standards include a requirement to assess the environmental, Social and Health consequences of any development, so that adequate measures can be taken to mitigate negative effects and to enhance opportunities. These assessments will be carried out prior to commencement of the development phases. For the environmental impact assessment of the proposed project, primary data by way of baseline data collection for the Physio-biological, social and health environmental components become necessary for the EIA process.

The Nigerian Government developed an Environmental Impact Assessment Procedural Guidelines as blueprint to protect the environment from accelerated economic growth in the country. The aspirations of the Guideline are to ensure that possible and potential effects (positive and negative) of any development project /program are determined prior to the commencement of the development project/ program/policy.

The IMP is developed to address the issues identified in the Environmental and Social Impact Assessment (ESIA) for the IEFCL-Train2 Project. Several activities associated with the Project, as well as the presence of other companies, are expected to induce influx of job and business seekers into the Social Study Area (SSA). This Influx Management Plan (IMP) has been compiled to address the specific impacts that are anticipated to occur as a result of planned developments as identified in the ESIA and associated impact assessment. This plan sets out a formal system by which IEFCL will manage mitigation measures that will reduce the impacts on Project induced by influx (PII).

### **2.1 Proponent**

The proponent of the proposed Project is the Indorama Eleme Fertilizer & Chemicals Limited, Eleme, Rivers State. It is the proponent's intent to establish IEFCL – Train 2 (Ammonia and Urea plant) from concept to design and to engineering, construction in line with the Nations Guidelines on manufacturing sector.

### **3. OBJECTIVES**

The objectives of this IMP are as follows:

- Monitor the scale of PII into the SSA;
- Avoid unplanned and unmanaged influx into the SSA; and
- Mitigate and manage any negative impacts and enhance/promote any positive impact related to PII.

#### **3.1 Scope**

The purpose of the IMP is to provide a clear set of actions and responsibilities for the control of impacts linked to within the Project's area of influence. This plan will be regularly reviewed and updated to reflect revised Project design, socio-economic changes and learning points experienced during its implementation.

This IMP should be read in the context of the Environmental and Social Management System. The ESMS provides the framework for a suite of management plans, described in Chapter 7 of the ESIA, which have been designed to address social and environmental risks and impacts associated with the Project. It is recognized that the ESMS and associated plans are living tools that will be constantly updated to accommodate changing circumstances.

### **4. LEGAL AND OTHER REQUIREMENTS**

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

#### **4.1 National/State Legislation and Policy**

Based on review of relevant National and State legislations, none of them were found to be very opportunistic to prevent influx of migration.

#### **4.2 IFC Performance Standards**

The IMP has been guided by international good practice regarding influx. This includes the International Finance Corporation's (IFC) handbook on PIIM, Projects and People: A Handbook for Addressing Project- Induced In-Migration(PIIM). IEFCL is committed to comply WITH the IFC's Performance Standards for Social and Environmental Sustainability (IFC PSs). The PS4 (Community Health Safety and Security) guide that proponent will avoid or minimize the transmission of communicable diseases that may be associated with the influx of Project labour. The commitments within the IMP have been developed to ensure that IEFCL address their social risks and impacts through a management plan as required in PS1.

## **5. ACCOUNTABILITY AND RESPONSIBILITY**

The Lead-EHS and the Head-Community Relations will be responsible for the implementation and management of all measures in relation to the IMP. All employees including contractors (and their employees) will be required to adhere to the requirements of the IMP. Construction contractor will be required to take a level of responsibility for ensuring the application of this plan to their staff.

With respect to this Plan, IEFCL has the responsibility to provide PIIM and to structure and coordinate Project induced influx management procedures for the proposed IEFCL-Train2 Project.

Furthermore, IEFCL management has the responsibility for ensuring that specific PIIM functions are allocated to Lead-EHS and the Head-Community Relations and are organized for proper implementation.. IEFCL has the responsibility to ensure that their employees and contracted third parties are trained and aware of all required PIIM procedures.

## **6. IMPACT MANAGEMENT**

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

The following sections will:

- Identify potential impacts associated with each phase of the Project;
- Identify the objectives and targets related to the impacts;
- Describe the management measure(s) to minimize the impact; and
- Assign responsibilities for the management measures.

### **Summary of Impacts to be managed**

The IMP has been developed to manage, avoid and mitigate and / or optimize a number of in-migration related impacts that are likely to result from the IEFCL-Train2 Project. These include:

- High cost of living due to the arrival of business opportunity and job seekers in to the area.
- Increased demand for utilities due to increased population.
- Acculturation leading to break down of local culture and tradition.
- Increase land speculation for various uses.
- Community unrest sparked up by due to change in the local economy.
- Increased potential for the transmission of communicable diseases from in-migrant populations to local communities, with potential for epidemics.
- Increased disposable income resulting in increased incidences of prostitution and casual sexual relations. These sexual relations could lead to an increase in STIs and an increased incidence of HIV/AIDS.

Management measures to control project induced in-migration during the different phases of the project are described in the table below:

## Management Measures for PIIM during Construction, Operation, Decommissioning and Closure

Phase			Objective	Mitigation/Management Measures	Monitoring Plan	Responsibility
Construction	Operation	Decommissioning and Closure				
<b>IN-MIGRATION PLAN</b>						
√	√	√	Develop and implement a PIIM Plan for the management of influx of people's into the project area.	Develop and implement a Management Plan covering the following: <ul style="list-style-type: none"> <li>• Communication and Engagement;</li> <li>• Minimizing potential for influx;</li> <li>• Enhancing physical infrastructure;</li> <li>• Building human capacity to manage influx;</li> <li>• Monitoring and evaluation of influx; and</li> <li>• Consideration of Project closure.</li> </ul>	<ul style="list-style-type: none"> <li>• Presence of an PIIM management plan</li> <li>• Implementation of the PIIM Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Lead-EHS</li> <li>• Head - Community Relations</li> </ul>
<b>MONITORING IN-MIGRATION</b>						
√	√	√	Monitor the rate of population expansion in project area.	<ul style="list-style-type: none"> <li>• Administer household survey bi-annual during construction for the purpose of analyzing changing dynamics in migration pattern in host communities.</li> <li>• Carry out random informal interviews within the host communities to evaluate perception of migration pattern, adequacy of related local infrastructure and related sources of potential conflict.</li> </ul>	<ul style="list-style-type: none"> <li>• Interview notes</li> <li>• Inclusion of summary of analysis derived from questionnaire</li> </ul>	<ul style="list-style-type: none"> <li>• Lead-EHS</li> <li>• Head - Community Relations</li> </ul>
<b>STAKEHOLDER ENGAGEMENT</b>						
√	√	√	Develop and implement a detailed Stakeholder engagement plan aimed at government/ traditional leaders and communities focused on communicating the risks associated with in-migration.	<ul style="list-style-type: none"> <li>• Dissemination of Information relating to increase of workers/influx of job seekers for IEFCL Train2, is captured in stakeholders engagement plan of section 7.3</li> <li>• Engage with Government authorities on issues, risks, and opportunities regarding in-migration.</li> <li>• Engage with local communities to understand their concerns, raise awareness of risk and opportunities, and identify solutions to issues relating to in-migration.</li> <li>• Operate feedback and grievance mechanism relating to influx of</li> </ul>	<ul style="list-style-type: none"> <li>• Records of engagement Undertaken, Stakeholder engagement minutes</li> <li>• Records of feedback and grievances</li> <li>• Presence of a feedback and grievance mechanism</li> <li>• Feedback and grievances accepted and responded within timeframe</li> </ul>	<ul style="list-style-type: none"> <li>• Lead-EHS</li> <li>• Head - Community Relations</li> </ul>

				persons as contained in stakeholder engagement plan section 12.0.		
<b>RECRUITMENT</b>						
√	√		Minimize influx of job seekers to the SSA through clear communication of employment opportunities and human resources procedures.	In addition to mitigation measures in IEFCL EMP, Implement the following: <ul style="list-style-type: none"> <li>Enforce IEFCL equal opportunity recruitment and procurement policies to minimize migration/influx of job seekers.</li> <li>Engage job seekers from catchment areas when possible.</li> </ul>	<ul style="list-style-type: none"> <li>Refer to Stakeholder Management Plan</li> </ul>	<ul style="list-style-type: none"> <li>Manager - Human Resources</li> <li>Lead-EHS</li> <li>Head - Community Relations</li> </ul>
<b>SPATIAL PLANNING AND PUBLIC</b>						
√	√		Collaborate with local partners and government to provide education and awareness programmes focused on diseases and health practices related to sanitation and hygiene.	Develop information, education and communication campaigns around diseases and health practices related to sanitation and hygiene.  Desire support from mitigation measures under social cultural aspects of project ESIA.	<ul style="list-style-type: none"> <li>Presence of Education Health and Awareness Programmes</li> <li>Record of engagements</li> <li>Availability of programme materials</li> </ul>	<ul style="list-style-type: none"> <li>Lead-EHS</li> <li>Head - Community Relations</li> <li>Head-Medical Indorama Clinic</li> </ul>
<b>GOVERNMENT CAPACITY BUILDING</b>						
√	√		Develop and implement an integrated capacity building programme designed to educate to how to manage in-migration.	<ul style="list-style-type: none"> <li>Provide technical support to relevant government authorities with the aim of assisting them in effectively administering land development and land use changes as appropriate.</li> <li>Provide support for promoting good relations between local people and in-migrants.</li> <li>Work with local authorities and village leaders to actively manage in-migration and its impacts,</li> <li>Provide opportunities for local authorities and host communities to plan, priorities, build and maintain necessary infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Presence of capacity building programme</li> <li>Record of training and development activities</li> <li>Record of government officials in attendance</li> <li>Record of engagements with communities</li> <li>Qualitative feedback from Beneficiaries</li> </ul>	<ul style="list-style-type: none"> <li>Lead-EHS</li> <li>Head - Community Relations</li> </ul>
<b>CULTURAL HERITAGE</b>						
√	√	√	Promote traditional conflict resolution methods where appropriate.	Work with the traditional governance network and the relevant LGA to promote traditional conflict resolution programmes through a consultation process, including sponsoring discussion between different communities where necessary.	<ul style="list-style-type: none"> <li>Engagement records of cases resolved with the assistance of formal and traditional leaders</li> <li>Records on incidence of conflict</li> </ul>	<ul style="list-style-type: none"> <li>Lead-EHS</li> <li>Head - Community Relations</li> </ul>
√	√	√	Ensure the continued utilization of traditional governance to address key stakeholder issues and concerns linked to the	Include traditional governance networks within stakeholder engagement activities in the SSA. The opinions and views of women, youth and the elderly will be ensured stakeholder engagement activities.	<ul style="list-style-type: none"> <li>Engagement records showing the utilization of formal and traditional leaders</li> <li>Records of programmes supported</li> </ul>	<ul style="list-style-type: none"> <li>Lead-EHS</li> <li>Head - Community Relations</li> </ul>

			proposed Project.			
√	√	√	Support/ organize a series of cultural activities to help strengthen local culture and encourage the current social ties and networks.	<ul style="list-style-type: none"> <li>Support the annual cultural festival and competition held at the LGA level. Such support which it is provided will be discussed and agreed with communities involved, to ensure that it reflects their preferences.</li> <li>Attend key cultural/ traditional festivities and celebrations to which they are invited.</li> <li>Support projects / educational programmes in local schools on culture.</li> <li>Work with local leaders and community groups to support integrated youth programmes related to sport, arts and culture seeking to build bonds and coordination between different ethnic groups. Funding may be presented as grants, sponsorship or through partnership with relevant organizations.</li> </ul>	<ul style="list-style-type: none"> <li>Records of grants issued and programmes supported</li> <li>Record of number of cultural events invited to and attended Indorama representatives</li> <li>Qualitative feedback from beneficiaries</li> </ul>	<ul style="list-style-type: none"> <li>Lead-EHS</li> <li>Head - Community Relations</li> </ul>
<b>WORKFORCE MANAGEMENT</b>						
√	√	√	Ensure that the IEFCL in-migrant workforce (including contractors) respects the cultural heritage of the both LG.	Develop and implement an induction programme. The induction programme will include a section on the culture and heritage. The programme will enhance in- migrants' sensitivity to local norms and customs and will ensure that contractors and employees are aware of appropriate and acceptable behaviors.	<ul style="list-style-type: none"> <li>Presence of Induction programmes</li> <li>Attendance records induction programmes</li> </ul>	<ul style="list-style-type: none"> <li>Manager – Human Resources</li> <li>Lead-EHS</li> <li>Head - Community Relations</li> </ul>
√	√	√	Develop and implement a camp management procedure, to limit in-migrant workforce interaction with local population/ Expatriates.	Develop a camp management procedure stating and ensuring that the operations camp is a closed camp. This will prohibit unauthorized visitors. This will be supported by appropriate engagement with workforce, signage and security / sign-in /out procedures. <b>CAMP MANAGEMENT PROCEDURE SHALL BE DEVELOPED SUBSEQUENT TO CONSTRUCTION CONTRACTOR ON BOARD AS PART OF ESAP</b>	<ul style="list-style-type: none"> <li>Presence of camp management procedure stating closed camp</li> </ul>	<ul style="list-style-type: none"> <li>Lead-EHS</li> <li>Head - Community Relations</li> </ul>
√	√	√	Develop measures to screen and test worker health to manage potential health impact related to community-worker force interactions.	Refer to Indorama QHSE Policy.	Indorama QHSE Policy	<ul style="list-style-type: none"> <li>Lead-EHS</li> <li>Head - Community Relations</li> <li>Head-Medical Indorama Clinic</li> </ul>