



Final Influx Management Plan



Limestone Quarry and Cement Production
Senegal

17 September 2021

Project No.: 0589781

Document details	
Document title	Final Influx Management Plan
Document subtitle	Limestone Quarry and Cement Production Senegal
Project No.	0589781
Date	17 September 2021
Version	1.0
Author	E Nunn
Client Name	Ciments de l'Afrique Sénégal

Document history

Version	Revision	Author	Reviewed by	ERM approval to issue		Comments
				Name	Date	
1	0.1	E Nunn	C Johnstone	C Johnstone	25.06.2021	
1	0.2	E Nunn	C Johnstone	C Johnstone	13.08.2021	Addressed comment

Signature Page

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Limestone Quarry and Cement Production Senegal



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Acronyms and Abbreviations

Name	Description
AIBD	Aéroport International Blaise Diagne (Blaise Diagne International Airport)
ANSD	Agence Nationale pour la Statistique et de la Démographie (National Agency for Statistics and Demographics)
ANAT	Agence Nationale pour l'Aménagement du Territoire (National Agency for Land Management)
Aol	Area of Influence
CIMAF	Ciments de l'Afrique
CSR	Corporate Social Responsibility
EHS	Environmental, Health and Safety
ERM	Environmental Resources Management
ESIA	Environmental and Social Impact Assessment
ha	Hectares
IFC	International Finance Corporation
km	Kilometres
m	Metres
N2	National Road 2
PSE	Plan Sénégal Emergent (Emerging Senegal Plan)
SDADT	Schéma Directeur d'Aménagement et de Développement Territorial (Directive Scheme for Land Management and Development)
SEN'EAU	Sénégal Eau (Senegal Water Agency)
SENELEC	Société Nationale d'Electricité du Sénégal (Senegal Energy Agency)
SSPT	Société Sénégalaise des Phosphates de Thiès (Senegal Phosphates of Thies Company)

1. INTRODUCTION

Ciments de l'Afrique (CIMAF) was established in 2011 with a mission to produce, market and develop innovative materials and services for the construction sector, while respecting national and international standards for process and environmental protection.

CIMAF is currently preparing to develop a Limestone Quarry and Cement Production Plant in the Thies Region of Senegal (hereafter referred to as "the Project").

An Environmental and Social Impact Assessment (ESIA) was undertaken for the Project in 2019 in accordance with legislative and regulatory requirements in Senegal. In order to secure financing from the International Finance Corporation (IFC), the ESIA is presently being updated in accordance with the requirements of the IFC Environmental and Social Performance Standards (hereafter referred to as "the Performance Standards").

The 2021 ESIA identified potential impacts on communities in the Project's Area of Influence (AoI) as a result of project-induced in-migration (also referred to herein as "influx"). In accordance with the recommendations of the updated ESIA, Environmental Resources Management (ERM) was engaged to prepare the present Influx Management Plan for the Project.

1.1 Objectives

The overarching goal of influx management is to identify and manage the impacts of project-induced in-migration in order to optimize positive impacts for the project and host communities while avoiding, minimizing or avoiding any negative impacts.

The present Influx Management Plan has been prepared in order to:

- Decrease incentives for speculative in-migration generated by the Project;
- Minimize potential negative impacts on communities in the Project's Direct AoI resulting from the influx of migrants;
- Support communities in the Project's AoI in capturing the economic benefits of in-migration where possible; and
- Strengthen the Project's relationship with local stakeholders and its social license to operate.

This Plan has been prepared in accordance with:

- Applicable legislative and regulatory requirements in Senegal;
- The requirements of the IFC's Environmental and Social Performance Standards of the and in alignment with the IFC Handbook for Addressing Project-Induced In-Migration (2009); and
- CIMAF's Corporate Social Responsibility (CSR) Policy.

1.2 Key Concepts

Project-induced in-migration involves 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 This can include direct opportunities (i.e. employment with the project), indirect opportunities (i.e. employment with a project supplier or contractor), or induced opportunities (i.e. jobs or other economic opportunities created as a result of the project but with no direct connection to it).

¹ Handbook for Addressing Project Induced In-Migration, IFC (2009)

A migrant's motivation will be unique to his or her personal circumstances; some may have familial or ethnic connections to the area and may intend to stay long-term, while others will be transitory and stay only as long as they can access some type of benefits.

Project-induced in-migration typically generates both positive and negative impacts for host communities, which are considered to be the existing communities where migrants settle, either temporarily or permanently. Risks and impacts associated with influx are discussed in detail in Section 3.

Influx management is a process undertaken to identify the risks and impacts expected to result from project-induced in-migration and design and implement measures that can help to manage these proactively in accordance with the Project's objectives. Typically, the measures defined in an influx management plan correspond to a project's direct area of influence (the communities or areas that will be directly affected by project activities as defined in the ESIA) and its indirect area of influence (the wider area that could be affected by project activities, either positively or negatively).

For the purposes of the present Influx Management Plan, the following definitions will be used:

- **Direct Area of Influence:** consistent with the definition of the Project's AoI in the updated ESIA (2021), this area includes the nine communities located within a 5 km radius of the Project site – Palal, Gap, Lene, Soune Serere, Soune Wolof, Thiambokh, Nangane, Thiambokh Peulh, and Palal Peulh; and
- **Indirect Area of Influence:** this area includes the larger settlements within 5 km of the intersection of the Project's access road and the National Road 2 (N2) where migrants seeking opportunities with the Project are likely to settle – specifically Pout and Thies.

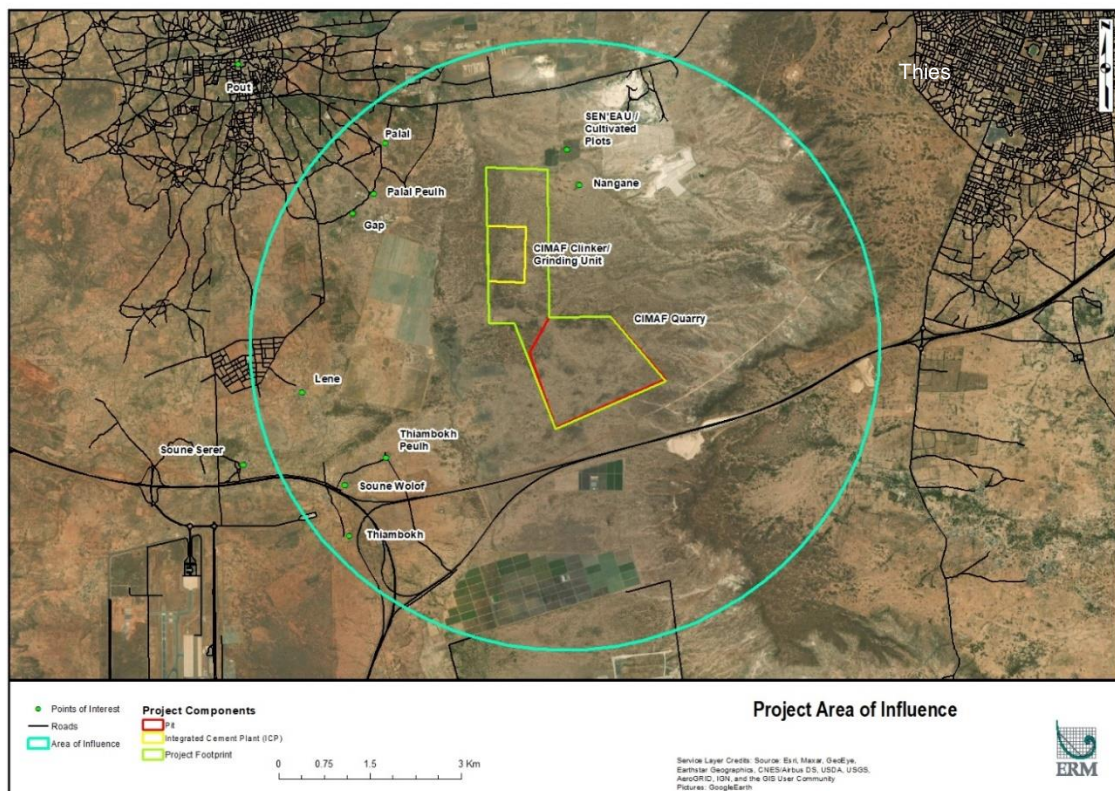


Figure 1-1 Direct Area of Influence

1.3 Contents of the Plan

This document includes the following additional sections:

- **Project Description:** presentation of the Project location, socio-economic context, and Project activities that may affect influx rates and settlement patterns;
- **Influx Risks and Impacts:** overview of potential risks and impacts associated with influx and analysis of the factors affecting the rate and significance of impacts of influx within the Project context;
- **Management Measures:** description of measures to be taken by the Project to manage the impacts of in-migration, including stakeholder engagement, local employment and procurement, worker accommodation and transportation, and social investment;
- **Monitoring:** definition of the approach the Project will take to monitoring impacts of in-migration and effectiveness of management measures; and
- **Implementation:** description of roles, responsibilities, timelines and resources required for implementation of the influx management measures.

The Project will have two (2) components:

- **Quarry:** Occupying an area of 250 ha within CIMAFA's 520 ha exploration permit, the limestone quarry will be developed through stripping to expose the limestone rock and mining to fragment the limestone into rubble (including one blasting event per week).
- **Cement Plant:** The Project will include installation a new clinker line and a new cement grinding and dispatch line. Plant facilities will include production workshops, storage halls, and an electrical supply network. The plant will be connected to the national energy grid. Cement will be packed onsite, loaded manually and transported off site by truck.

Additional facilities and infrastructure to be constructed for the Project include:

- Administrative building with a main control room and laboratory;
- Cafeteria;
- Infirmary;
- Dressing / locker room;
- Mosque;
- Security post;
- Perimeter fence;
- Concrete walkways around the production workshops;
- Internal roads and parking lots; and
- Paved access road to the site from the N2.

The Project is expected to employ approximately 800 people during the construction phase, 10% of whom will be skilled workers (i.e., engineers, managers). During the operations phase, the Project will employ approximately 280 people, including 80 CIMAFA employees and 200 contractors and their personnel. There will be no accommodation for workers built on site.

The Project's water supply will require construction of a compartmentalized basin with a water treatment system and set of pumps and devices required for operation of the plant and firefighting. The quarry's water needs are estimated at 10 l/tonne of limestone produced, and those of the plant at 80 l/tonne of clinker. The Project intends to drill a borehole from which it will draw its water; it is estimated that the water table is at a depth of 200 m.

The Project will be built in accordance with applicable legislative and regulatory requirements in Senegal pertaining to environmental, social and health and safety standards, as well as the requirements of the IFC Performance Standards and the World Bank Group's Environmental, Health and Safety (EHS) Guidelines for Construction Materials Extraction and for Cement and Lime Manufacturing. Protective measures will be put in place to minimize impacts on the environment and surrounding communities, including the use of bag filters for dust collection, construction of covered conveyors, installation of equipment to reduce noise levels, and continuous analysis of gases at the chimneys.

2.3 Socio-Economic Context

A detailed presentation of the socio-economic baseline conditions in the Project's Aol is provided in the updated ESIA (2021). The data collection process for the ESIA update included focus group discussions in six communities in the Project's Aol (Gap, Lene, Nangane, Palal, Soune Serer, and Soune Wolof), as detailed in the updated ESIA. Key information from the ESIA baseline that has particular relevance for influx management is presented below.

2.3.1 Demographics

Senegal has a total population of 13,508,715, which is roughly 51% male and 49% female. Approximately 48% of the population lives in urban areas, while 62% live in rural areas.²

Senegal has a high illiteracy rate (40%) and unemployment rate (48%), even among university graduates.³ More than 60% of Senegal's population is under the age of 25.

Approximately 46% of the population in Senegal lives below the poverty line, which in urban areas (excluding Dakar) is calculated as 1.86 USD / day; in rural areas the poverty line is calculated as 1.11 USD / day.⁴

The population of the commune of Keur Moussa is estimated to be 46,908 (2019), with a roughly equal number of men and women. More than 9,000 people live in Project's Direct AoI; population estimates are provided in the table below.

Table 2-1 Population - Direct AoI

Community	Estimated population
Gap	1 300
Lene	1 100
Nangane	150
Palal	3 000
Palal Peulh	38
Soune Serer	3 015
Soune Wolof	410
Thiambokh	N/A ⁵
Thiambokh Peulh	300
TOTAL	9 313

The dominant ethnic group in the commune of Keur Moussa is Serer (63%), followed by Wolof (30%) and Peulh (7%). The vast majority of the population of the commune is Muslim, though several important religious sites for Catholics are located in the Keur Moussa, including two monasteries and a convent. Six communities in the Project's AoI are villages that are predominantly Serer (Palal, Gap, Lene, Soune Serere, Soune Wolof, and Thiambokh); the three remaining communities are Peulh hamlets (Nangane, Thiambokh Peulh, and Palal Peulh).

The Project's Direct AoI includes two privately owned land parcels covering 15 ha total (referred to as the SEN'EAU cultivated plots given location immediately adjacent to the pumping station of the national water agency, located northeast of the Project site) that is being cultivated by 13 workers who reside on site. The workers are all male between the ages of 19 and 39 who live alone on site (i.e., without their families).

As part of the updated ESIA process, a household survey was conducted in the three Peulh hamlets and with the workers of the cultivated plots.

² <https://www.cia.gov/the-world-factbook/countries/senegal/#people-and-society>

³ <https://www.cia.gov/the-world-factbook/countries/senegal/#economy>

⁴ Mapping the Poor in Senegal: Technical Report, ANSD / World Bank (2016)

⁵ Population data unavailable as consultation could not be completed as part of the ESIA.

Focus groups were also held with the Village Chief and elders, farmers, herders, women and youth of the remaining six villages. The data presented below was collected through that process, which is detailed further in the updated ESIA (2021).

- The average household has seven members.
- The majority of households are headed by males, married with one or more spouse.
- The average age of the head of household is 39.
- All surveyed households reported to be Muslim.
- Wolof is the most widely spoken language, both as a primary and secondary language. Peulh is the second most widely spoken language.
- The majority of residents are illiterate, including one fifth of heads of household.
- The majority of residents attended Koranic school, with very few completing elementary or secondary school.

2.3.2 Vulnerable Groups

Overall, the communities in the Project's Direct Aol demonstrate characteristics suggesting a high level of vulnerability to any significant economic shocks, including low levels of literacy and formal education and a dependence on seasonal and land-based livelihood activities. Households surveyed in March 2021 reported low levels of savings and relatively low levels of social capital or organization.

Two specific groups within the communities in the Project's Direct Aol have the potential to be differentially or disproportionately affected by the Project because of their marginalized status within the dominant social structure: women and Peulh communities. This vulnerability is heightened by the dependence of these groups on access to the Classified Forest for their livelihood activities, which will be affected as a result of the Project's land acquisition. Detailed descriptions of the vulnerability status of each group are provided in the updated ESIA (2021), from which the following points are drawn that have particular relevance to influx management planning.

Women

- The Senegal Emerging Plan (PSE), which serves as the country's policy framework for development, specifically commits the country to the goals of non-discrimination and equality of opportunity for men and women.⁶
- Despite the presence of a strong legal and political framework, gender equality is hampered in Senegal due to a prevailing patriarchal culture and women's continued exclusion from formal education, traditional governance structures, decision-making, and formalized economic opportunities.
- Women are often excluded from formal decision-making bodies, are impeded in their economic activities due to their domestic burden, and overall are attributed a lower social status than men.
- Women in rural areas in Senegal are often active in the cultivation and resale of agricultural products, however, they are typically unable to own land.⁷ This was reported to be the case for many women in the Project's Direct Aol.

Peulh communities

- Traditionally, Peulh communities were largely nomadic, traveling with their livestock along established migration routes in accordance with the seasons. Conflict arose along these routes

⁶ Plan Emergent du Sénégal (2019)

⁷ <https://africa.unwomen.org/en/where-we-are/west-and-central-africa/senegal>

between local residents and Peulh herders who cut trees or branches to feed their livestock or whose livestock entered agricultural fields and destroyed crops. This in turn led to mistrust and prejudice against the Peulh in many cases.

- Recently, Peulh communities who have been able to access consistent sources of fodder for livestock have built semi-permanent or permanent structures and live in the same location year-round. This is the case in the Project's Direct AoI where the Peulh communities of Nangane, Thiambokh Peulh and Palal Peulh have settled and graze their livestock exclusively in the Classified Forest.
- All three communities depend on pastoralism as their primary livelihood activities.
- The three communities are hamlets of larger villages – Daral Peulh in the case of Nangane, Soune Wolof in the case of Thiambokh Peulh, and Palal in the case of Palal Peulh – and are represented by those villages' hereditary Chiefs.
- No inter-community conflict or security issues were reported during the March 2021 consultation, however, Peulh hamlets were not necessarily represented among village leadership (i.e., Village Chief and elders) and special arrangements had to be made to ensure their participation in the consultation.

2.3.3 Infrastructure

Infrastructure in the Project's Direct AoI is limited, and community members reported challenges in access public services during consultations in March 2021. There are few public facilities in the Project's Direct AoI and access to those that do exist is made more difficult by the absence of any paved roads between the N2 and A1 Highway or public transportation.

The infrastructure identified in each community consulted in March 2021 is presented in the table below.

Table 2-2 Infrastructure - Direct AoI

Community	Health	Education	Water	Electricity	Waste Management
Gap	None	Primary School	Well, SEN-EAU piped water	Streetlights only	None
Lene	None	Primary School	2 wells, 3 public taps (only 1 functions), SEN-EAU piped water	Streetlights only	None
Nangane	None	None	None (use well at SEN-EAU pumping station)	None	None
Palal	None	Primary School	SEN-EAU piped water, private taps on large concessions	Available but very few houses connected	None
Soune Serer	Health Post	Primary School, College	Well (broken), public taps, SEN-EAU piped water	Yes (in 10 out of 12 hamlets)	None
Soune Wolof	None	None	SEN-EAU piped water	Streetlights only	None

Thiambokh Peulh	None	None	Public tap	None	None
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2.3.4 Economy and Livelihoods

Primary livelihood activities reported during the consultation carried out in March 2021 were seasonal (rain-fed) agriculture and pastoralism (herding). Environmental changes, specifically desertification, have contributed to increasing challenges for both activities in recent years. Many participants in focus group discussions commented on the gradual reduction in agricultural yields and fruit trees production. These challenges are perceived to be compounded by the presence of numerous industrial projects in the area, which residents claim have their affected access to water (due to a lowering of the water table), agricultural land and grazing land. Dust generated by industrial projects in the area, specifically the quarry of Société Sénégalaise des Phosphates de Thiès (SSPT), is also perceived to be contributing to lower yields, as well as health problems among livestock and residents.

Farmers in the Project's Direct Aol noted worsening growing conditions, specifically due to unpredictable rainfall and lack of access to water for irrigation. Some farmers in the Project's Direct Aol explained they have chosen to convert their agricultural land to urban land (i.e., registering their land parcels as urban land with the Commune so it can be sold and used for residential purposes) due to limited income from rain-fed agriculture, though they continue to cultivate the land up until the moment it is sold.

All pastoralist activities were reported to depend in part of in full on the Classified Forest, meaning all herders reported to graze their animals occasionally – if not exclusively - within the Classified Forest. A former quarry located northeast of the Peulh hamlet of Nangane was cited as the only waterpoint remaining for livestock within the Classified Forest.

The Project's Direct Aol includes 15 ha of cultivated parcels, located next to a SEN'EAU facility between the N2 and the community of Nangane.

The primary – and almost exclusive – livelihood activity of women in the Project's Direct Aol is small-scale commerce. Among women in Peulh communities, this is specifically the sale of milk from livestock. Women in other communities report collecting forest products or buying small goods such as vegetables and sugar and reselling them in surrounding villages or along the N2. Women's activities are directly linked to communities' access to ecosystem services in the Classified Forest, where they collect products including fruit, wood for burning, wood for construction and medicinal plants. Women in the Project's Aol also participate in traditional rotating savings and credit programs between the members of their groups and associations.

Youth consulted in March 2021 reported high levels of unemployment; the training and recruitment of youth was the most common request made by community members in terms of their expectations of the Project. Youth cited having diverse and advanced qualifications, but claimed they are unable to find any employment opportunities in the area. Recent projects, including construction of the A1 Highway and the AIBD, reportedly hired only a small number of labourers from the Project's Aol and even then, only as day labourers for short periods of time.

More than 70% of households surveyed in March 2021 reported their revenue being sufficient to meet household needs. Low levels of savings were reported among surveyed households; only 35% of households reported having any type of savings and of those almost all save within their households as opposed to through a microcredit or formal banking system.

2.3.5 Access to Land

Land in Senegal is commonly accessed through formal, traditional and informal ownership structures. The majority of residents in rural communities do not have a formal land title but have customary rights to their residential and agricultural lands, allocated by traditional community leaders. Customary land

ownership is passed down to male heirs; women in the Project's Direct Aol do not typically own land, though it is reportedly possible in exceptional circumstances.

Under national regulations, construction of any kind is prohibited within the Classified Forest unless authorization has been granted by the Directorate of Water and Forests. This includes construction of any buildings; the Peulh community of Nangane reports to have been given authorisation to build non-permanent structures at its current site in 1994. National regulations allow residents to use the Classified Forest for non-intensive traditional livelihood activities – such as grazing livestock, collecting fallen wood (cutting of trees is not permitted), and collecting fruit and plants – but agriculture is not permitted without authorization.

Community members consulted in March 2021 reported intense land pressure in the Project's Direct Aol as a result of an increasing number of private sector projects with large land use footprints. The figure below identifies the location of projects that were cited by residents in March 2021 as having affected their access to land – notably the SEN'EAU cultivated plots, SSPT, the Fruta Italia project, multiple private sector agricultural projects, construction of the A1 Highway, and construction of the AIBD and the related resettlement constructed to the east of the Project's Direct Aol.

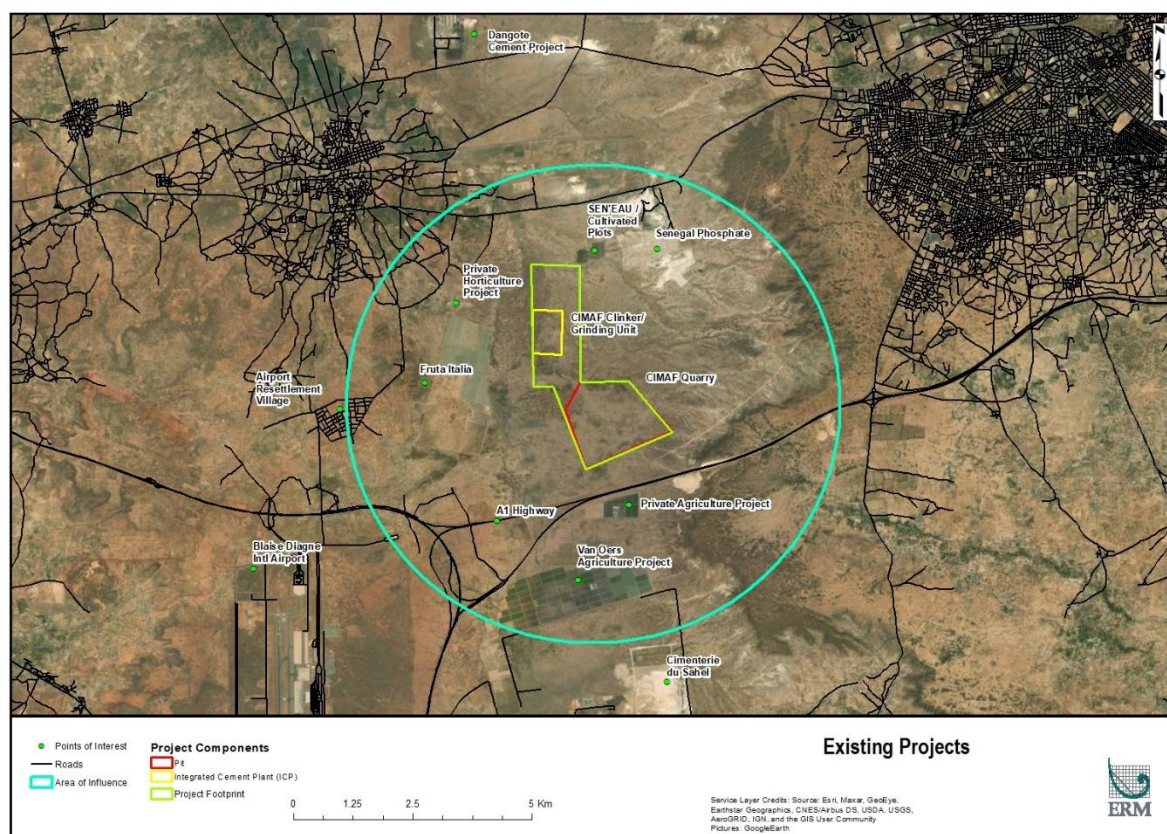


Figure 2-2 Existing Projects

Within the Classified Forest specifically, multiple private sector projects have been allocated land by the Government through a process of declassification administered by the Directorate of Water and Forests. In 2013, the total area of the Classified Forest was 11 081.2 ha; at that time 474.3 ha had been declassified.⁸ Today, the total area of the CF is reported to be 8 700 ha, suggesting more than 2,300 ha has been declassified in the last eight years.

⁸ <https://www.ansd.sn/ressources/ses/chapitres/8-ressources-forestieres-Thiès2013.pdf>

During the consultation process, residents in multiple villages - specifically Village Chiefs, elders and youth - expressed frustration over the declassification of land in the Classified Forest for private sector projects, without any allocation of lands to the local population for their own agricultural use.

Villages on the southern edge of the Project's Direct Aol also voiced frustration and disappointment over the management of the resettlement process for the construction of the AIBD and the A1 Highway, completed in 2017 and 2018 respectively. Their concerns included claims of displacement from agricultural land and the inability to acquire replacement land due to scarcity of arable land in the area, as well as partial or outstanding compensation payments.

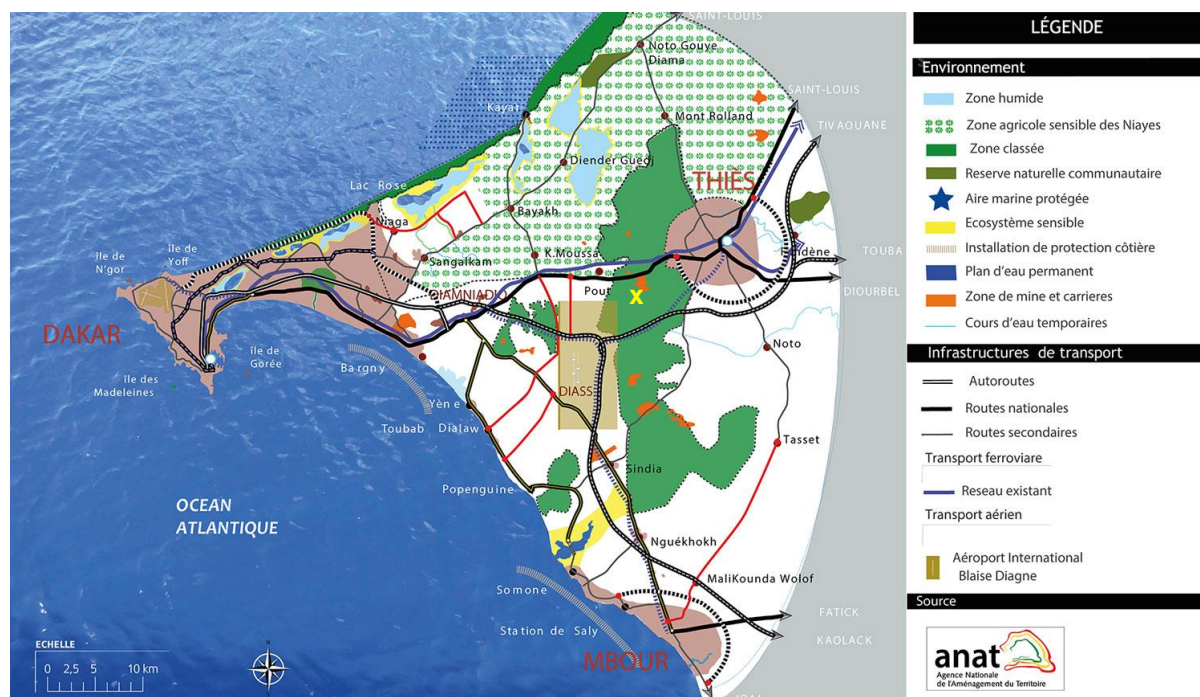
2.3.6 Regional Development

The area between the cities of Dakar, Thies and Mbour has been targeted by the Government of Senegal for urban, commercial, and industrial development. This triangle is recognized as having rich natural resources ideal for mining, agriculture, and fishing activities. This area has become a hub for the extractive sector, with multiple quarries and cement factories in production and under development. The area has also seen the construction of the AIBD, the extension of the A1 Highway, and the development of the Diamniadio industrial zone, and further investments are planned in projects including a train line from Dakar to the AIBD, a Special Integrated Economic Zone, and the second university of Dakar. One objective of this development is to reduce urbanisation rates in Dakar and associated pressure on its strained infrastructure by encouraging more settlement in surrounding areas.

In order to manage development in this area, the National Agency for Land Management (ANAT) prepared a Directive Scheme for Land Management and Development (SDADT) of the Dakar-Thies-Mbour triangle in 2015.⁹ The SDADT recognizes the area's challenges associated with land pressure, industrial risks, degradation of forests, unplanned settlements, and lack of infrastructure. It aims to, among other things, improve land use by equipping local communities with the necessary planning tools and by surveying and securing land reserves. In terms of economic development, the SDADT commits to strengthening the agricultural value chain and protecting agricultural areas; creating modern farms to promote intensive herding; and promoting the knowledge economy by creating a hub of professional training in line with economic activities of the region.

The figure below identifies the key zones demarcated within the SDADT for the Dakar-Thies-Mbour triangle. The Project site (indicated with a yellow "x") is located within a Classified Zone, immediately east of the northeast corner of the area demarcated for the AIBD and south of a zone demarcated for mining and quarries.

⁹ <http://www.anat.sn/triangle-dtm/>



Source: National Agency for Land Management (2015)

Figure 2-3 Regional Development Plan

The planned expansion of the AIBD includes construction of logistics and training facilities, an international exposition hall, hotels, and leisure centres. It is expected this development will occur to the west of the Project site and in close proximity to numerous communities in the Project's Direct AoI, though no definitive plans have been made public. In addition, the construction of a paved road connecting the A1 Highway and the N2 road at Pout has been announced, which will lead to increased traffic in the area.

2.4 Associated Project Activities

In addition to construction and operations of the quarry and cement plant, the Project activities presented in this section have the potential to inform migrant settlement patterns and the significance of influx impacts.

2.4.1 Local Employment

During the original ESIA process in 2019, CIMAFA representatives made a commitment to prioritizing the recruitment of local residents for employment with the Project. Stakeholders consulted in March 2021 expressed high expectations in this regard, particularly for youth who experience high rates of unemployment. Many stakeholders consulted also expressed frustration with other private sector projects in the area that failed to hire or create meaningful economic opportunities for local communities.

The Project is expected to create 800 jobs during construction and up to 250 jobs during operations. In accordance with the management measures set out in the updated ESIA (2021), the Project will prepare a Local Content Plan that will formalize the Project's commitment to prioritizing local recruitment where possible and define the application and selection procedures. It is expected that local recruitment – or at least the collection of applications from residents of the Direct AoI – will be managed in coordination

with relevant government authorities (such as the Mayor and Sub-Prefect of Keur Moussa) and there will be no hiring done at the gate of the Project.

As such, promotion of the Local Content Plan will help to deter influx to the Project's Aol by job seekers (see more details in Section 4.2).

2.4.2 Local Procurement

As outlined in the updated ESIA, the Project's Local Content Plan will commit the Project to prioritizing the purchase of goods and services from local providers (i.e., those with established businesses in the Project Area – with specific geographic boundaries to be defined) where competitive quality and pricing requirements can be met. Broad dissemination of the commitment to local procurement will help to increase the benefits of influx by encouraging new businesses to establish themselves in the Project's Aol, generating new employment opportunities and contributing to the local economy.

2.4.3 Access Road Construction

The Project site is located approximately 5 km south of the N2. In order to access the site, the Project will utilize an existing road that runs between the N2 and the SEN'EAU pumping station. The initial 605 m of the road running south from the N2 is paved but in poor condition and will require rehabilitation prior to use by the Project. The remainder of the road will have to be widened and paved in order to reach the quarry, located approximately 2.3 km south of the SEN'EAU pumping station. A new 500 m road will have to be constructed to connect the access road (between the N2 and the quarry) with the site of the cement plant.

The existing access road is approximately 200 m west of the community of Nangane. Access to Nangane will be improved as a result of the Project's roadworks. Nangane is the only community located along the access road and within the Classified Forest; it is a Peulh community with semi-permanent structures and no infrastructure. It is therefore unlikely – though not impossible - that improvement / construction of the access road will attract migrants to settle in Nangane.

Improvement / construction of the access road will make it easier for people to reach the Project site, underscoring the importance of ensuring the Project does not do any hiring at the gate, but follows the procedure set out in the Local Content Plan (see details in Section 4.2).

2.4.4 Social Investment

In accordance with CIMAF's CSR Policy and the management measures set out in the 2021 ESIA, the Project will develop and implement a Social Investment Plan. The Plan will set the criteria and procedure that will be used to select community development initiatives that will receive financial or in-kind support from the Project during the construction and operations phases. The level and type of support to be provided by the Project are not yet defined, however, any investments in public infrastructure or community development can make areas appealing to migrants who are looking to settle – temporarily or permanently – in the area.

3. INFLUX RISKS AND IMPACTS

Project-induced in-migration can benefit a project and host communities in a number of ways, including:

- Increasing the availability of skilled workers;
- Increased demand for local goods and services;
- Introducing of new products into the local market;
- Creating employment opportunities with existing and new businesses;
- Improving local wages, income levels, and purchasing power;
- Increasing local tax revenue;
- Community empowerment stemming from increased income and wealth;
- New training and skills development opportunities;
- Increasing attention of and investment by government in infrastructure and public services; and
- Bolstering population numbers in areas with aging or declining populations.

At the same time, there are significant environmental and social risks that come with the arrival of a large group of migrants in an area with low levels of infrastructure, essential services, and government capacity. Some of the most significant risks can include:

- Rising tension and the potential for conflict between existing populations and newcomers;
- Increased rates of deforestation, degradation of habitats and biodiversity loss, overhunting and overfishing, and housing, food and water shortages;
- Increased pressure on agricultural land;
- Increased cost of living (inflation) and decreased access to basic goods and services by the poor and vulnerable;
- Overwhelming of public services, including healthcare, schools, water, electricity, police and fire services, green spaces, community areas, public transport, and other infrastructure;
- Proliferation of diseases, particularly HIV/AIDS, STIs, respiratory infections and vector- and water-borne diseases;
- Increased occurrences of criminal behavior and increased public insecurity;
- Destruction or desecration of sites with cultural significance and loss of cultural heritage;
- A breakdown of cultural norms and traditional structures, leading to social ills such as alcoholism, drugs, gambling, and prostitution; and
- Strained relationships between the company and project proponent.

Influx can present a significant risk to project development and operations when not properly managed. Rapid in-migration can lead to escalating demands being made on projects for jobs and social supports and the presence of unsatisfied migrants and frustrated communities at the project gate. While these risks require proactive management, project proponents should not only focus on mitigating negative impacts; influx can bring with it significant opportunities for economic growth in otherwise underdeveloped areas. Strategies for managing project-induced in-migration must therefore take into account in equal measure the potential risks and opportunities of influx.

3.1 Project Context

Specific factors affecting the probability of project-induced in-migration and the significance of associated impacts (as set out in the IFC Handbook for Addressing Project-Induced In-Migration) are presented in the table below. Each factor has been analysis within the Project context and a probability rating of low, medium or high assigned.

Table 3-1 Influx Probability Analysis

FACTOR	DESCRIPTION	PROJECT CONTEXT	PROBABILITY
Population mobility	Countries and regions with a large rural population reliant on agriculture subsistence-based livelihoods, high unemployment or under-employment rates, highly concentrated development, and a low per capita GDP are likely to experience significant internal migration towards economic opportunities. This same trend is common in regions where neighbouring countries share similar characteristics and allow uncontrolled movement across borders by their residents.	Senegal exhibits many of the criteria that lead to high rates of population mobility, including dependence on subsistence agriculture in rural communities, high unemployment – especially among youth, concreted development in urban areas – particularly the Dakar-Thies-Mbour triangle, and low per capita GDP. Migration of rural residents of Senegal towards urban areas is a well-documented phenomenon consistent with urbanization trends across Africa. ¹⁰ Cross-border movement between Senegal, Guinea and Mali is also well documented, though typically concentrated in the southeast gold mining region of Senegal. ¹¹	High
Project characteristics	Specific attributes of a project that contribute to the “pull factors” include its demand for labour, goods and services. High construction phase labour requirements are likely to exceed local capacity and therefore require in-migration. The associated impacts are increased when the construction phase is extended over a long period. High labour demands during the operations phase require similar inputs from the workforce and lead to longer periods of residence for workers and higher levels of investment by and dependency on the project.	The Project is expected to have an 18-month construction phase during which 800 jobs will be created. The operations phase may extend up to 100 years and will create 250 jobs. While the Project is committed to hiring locally where possible, it is likely that some positions – particularly those of skilled workers – will need to be filled from outside the Project’s Aol. The Project will not be constructing any worker housing, meaning the labour force will be accommodated locally.	Moderate
Area capacity to meet project needs	The project area may not have the capacity to meet the workforce and supply needs of the project during the construction and operations phases. In such cases, in-migration is not only likely but a necessity. Similarly, the existing infrastructure, services and utilities in an area may not be sufficient for the project’s needs; project investment in this regard can make the local area more attractive to migrants and contribute to increased in-migration.	The Project will put in place a Local Content Plan to manage the recruitment of workers and purchase of goods and services during the construction and operations phases. Where needs cannot be met locally, they can be met through the cities of Dakar, Thies and Mbour. The Project will improve/construct an access road connecting its site to the N2. The Project will be connected to the existing energy network and will dig its own borehole, suggesting the area has	Low

¹⁰ Perspectives Urbaines: Villes Emergentes pour un Senegal Emergent , World Bank (2016)

¹¹ Gold Fevers in Senegal: An Analysis of Migration Profiles and Dynamics in the Kedougou Region, IOM (2019)

		sufficient capacity to meet project needs in this regard. Support for community development initiatives provided through the Project's Social Investment Plan could make the area more attractive to migrants.	
Tendency toward dependency and concentration	Areas with high levels of economic activity within or across sectors and with established infrastructure, services and utilities are less likely to depend on one project as an economic driver. Areas with integrated economies can more easily absorb migrants and diffuse the population over a broader economic base. This reduces the risk of migrants concentrating settlements around the project site or at its gate.	The Project is being constructed in the Dakar-Thies-Mbour triangle, marked for industrial development by the Government of Senegal. The proximity of these cities (and of the town of Pout) to the Project site suggests the area will be able to absorb new migrants and there will be little risk of migrants settling in concentrated areas around the site (which would be impeded further by restrictions on settlements within the Classified Forest). The presence of multiple other industrial projects in the area suggests the Project is unlikely to be seen as a primary economic driver in the region, though local residents' expectations for employment will remain high.	Low
Rate and magnitude of in-migration	Rapid influx of large numbers of migrants can cause issues for host communities, even in economically integrated areas that have higher absorptive capacity. When influx occurs steadily over a longer period, host communities are better able to adapt and capture associated benefits.	The Project's creation of 800 jobs during the construction phase is likely to attract a large number of job seekers; proactive steps will be taken to discourage in-migration for direct employment by disseminating a policy of prioritizing local recruitment. Planned investment in additional projects (such as the expansion of the AIBD) and infrastructure to the west of the Project's Direct AoI have the potential to contribute to in-migration rates and the significance of impacts on communities in this area, however, these investments are unlikely to be made for several years.	Moderate
Assimilative capacity	The rate and nature of project-induced increases in population that an area can absorb without significant environmental or social impacts depends on a number of factors, including: the ability of physical resources to accommodate increased resource use without degradation; the ability of infrastructure, services and utilities to meet higher demand; and social factors such as politics, government capacity, security, and culture.	Low levels of existing infrastructure, access to services, and access to land in the Project's Direct AoI suggest that it would have limited assimilative capacity if faced with high level of in-migration. However, proximity of the area to major urban centres indicates the broader region will be able to absorb migrants. It is unlikely a significant number of migrants would attempt to settle within the Project's Direct AoI given its limited infrastructure, however, proactive measures should be taken to minimize this risk while supporting communities in capturing the benefits of in-migration to the extent possible.	Low

On the basis of the above and in accordance with the assessment tool provided in the IFC Handbook for Addressing Project-Induced In-Migration, it is expected there would be a moderate probability of influx impacts associated with the Project. However, implementation of the management measures outlined in the following section is expected to reduce the probability from moderate to low.

3.2 Influx Hotspots

Influx hotspots are the areas to which new arrivals are expected to be attracted and to settle. Hotspots experience the highest and most rapid rates of in-migration. Awareness and preparation are therefore critical to managing the negative impacts and capturing the benefits of in-migration in these areas specifically. This section identifies the Project's potential influx hotspots in the Direct and Indirect AoI.

- **Palal:** As discussed above, it is unlikely that large numbers of migrants will settle in the communities in the Project's Direct AoI due to the low levels of infrastructure and access to services. However, the proximity of the village of Palal to the N2 (less than 1 km) may make it attractive to migrants seeking basic accommodation outside of denser urban areas. During the ESIA consultation (March 2021), residents of Palal reported challenges in accessing water, public services and land for residential development and livelihood activities. The arrival of large numbers of migrants would likely compound these challenges, though it would result in the generation of revenue for some households through the provision of rental accommodation and related services. Influx is less likely to impact the Peulh hamlet of Palal Peulh, as it is located south of the village of Palal (approximately 1.5 km from the N2), though the arrival of new migrants in Palal could have an influence on the relationship between the Serer and Peulh residents. Other communities in the Project's Direct AoI may become more attractive to migrants if the Project provides transportation for workers to and from the Project site (see Section 4.4) and makes investments in infrastructure through its Social Investment Plan (see Section 4.5), though these communities would still be unlikely to constitute influx hotspots.
- **Pout:** The town of Pout is located 4.5 km west of the intersection of the Project's access road and the N2. The intersection can be reached from the eastern edge of Pout within 5 minutes by vehicle, making it the most accessible urban area to the Project site. The population of Pout has grown steadily as a result of industrialization of the area – specifically the Dangote Cement project, which falls in the geographic boundaries of Pout – such that the town was given Commune status in 1990. The Commune of Pout has a population of over 29 000.¹² While infrastructure issues in Pout are likely comparable to those in other urban areas of Senegal outside of Dakar (e.g., regular power cuts, poor water quality, limited public transport, no waste management, etc.), the town would be attractive to new arrivals looking for accommodation and services near the Project site. Depending on the availability of rental accommodation in Pout, it is expected that migrants would be likely to settle here.
- **Thies:** The city of Thies is the departmental capital and the third largest city of Senegal, with a population of more than 660 000.¹³ Thies' population is growing steadily, with urban sprawl so extensive that the city has been divided into three parts, each given Commune status: Thies North, East and West (Thies South remains an Arrondissement). Thies West is approximately 6 km from the intersection of the Project's access road and the N2: a trip of less than 10 minutes by vehicle. The city of Thies offers improved infrastructure and access to services for residents, particularly in comparison to communities in the Project's Direct AoI. Rental accommodation is easily found at varying price points and related services (e.g., meals, cleaning, etc.) are easy to arrange. As a result, it is likely that migrants moving into the area in search of employment or other opportunities with the Project will choose to settle in Thies. Of all the communities in the Project's Direct and Indirect AoI, Thies has the greatest absorptive capacity and the influx of migrants due to the Project is unlikely to have any significant – if noticeable – impacts.

¹² The population of Pout was 27 189 in 2018 with an annual growth rate of 2.8%. See Situation Economique et Sociale Régionale 2017-2018, ANSD (2020).

¹³ The population of Thies was 608 938 in 2018 with an annual growth rate of 2.8%. See Situation Economique et Sociale Régionale 2017-2018, ANSD (2020).

4. MANAGEMENT MEASURES

This section presents the measures that will be implemented by the Project in order to manage the risks and impacts of in-migration and to maximize associated benefits for communities in the Project's Direct Aol. To the extent possible, all influx management measures supported by the Project will align with and contribute to existing plans and priorities for regional development, including the SDADT for the Dakar-Thies-Mbour triangle and the Commune Development Plan for Keur Moussa. Implementation arrangements for management measures are presented in Section 6.

4.1 Stakeholder Engagement

The successful mitigation of influx impacts often depends on how early the Project takes action on this issue. Based on consultation with stakeholders in the context of the updated ESIA (2021), a priority action for the Project will be to conduct more formal engagement with local authorities and community leaders on the likelihood and potential impacts of project-induced in-migration.

This engagement should be carried out through the Project's Monitoring Committee, the multi-stakeholder body that will be set up to support communication and consultation between the Project and local stakeholders (see details in the Project's Stakeholder Engagement Plan – June 2021). The Project will share the measures it will undertake to manage and monitor influx and discuss any necessary adjustments, including ensuring alignment of influx management measures with the SDADT for the Dakar-Thies-Mbour triangle and the Commune Development Plan for Keur Moussa. As part of engagement on the topic of influx, it will be important for the Project to share its understanding of its own scope of responsibility towards the management of associated impacts. This will help to manage the expectations and demands of local authorities in this regard. Feedback from the Monitoring Committee will be integrated into the present Influx Management Plan, which will then be finalized.

Once the Influx Management Plan is finalized, key content will be integrated into the Project's engagement with broader stakeholder groups, including vulnerable groups, to ensure they are aware of the potential risks, impacts and opportunities associated with influx. In particular, consultation will include consideration of any necessary adjustments to influx management measures to minimize risks to community health and safety (see community health and safety management measures in the updated ESIA – 2021). Implementation of influx management measures will be monitored and reported on as per the procedures defined in the Project's Stakeholder Engagement Plan (June 2021).

4.2 Local Employment

During the public audience of the original ESIA process in 2019, Project representatives made a commitment to prioritizing local recruitment. This commitment will be formalized in a Local Content Plan that will be prepared by the Project and rolled out prior to the start of construction. The Plan will define the procedure for the application and selection of skilled and unskilled workers for the Project, as per CIMAF's Human Resources procedures. It will outline the communication and engagement mechanisms that will be used to ensure recruitment priorities and procedures are broadly disseminated. These mechanisms are expected to include radio announcements, notices on public notice boards (such as those at the offices of the Mayor and Sub-Prefect in Keur Moussa), and public forums at a minimum. Dissemination of this message will be critical to deterring in-migration by individuals seeking direct employment with the Project.

The number, type and timeline for jobs that will be created by the Project will also be communicated to stakeholders in the Direct Aol in order to manage expectations. As part of preparation of the Local Content Plan, the Project may conduct a skills inventory – surveying residents of the communities in the Project's Direct Aol to establish a registry of available skills and qualifications. This registry would be used to identify semi-skilled or skilled workers from the Project's Direct Aol, who would be encouraged to apply for open positions through the established application and selection procedure.

The procedure for the application and selection of workers will be validated with the Project's Monitoring Committee prior to finalization to ensure it is locally appropriate. To the extent possible, the procedure will involve relevant government authorities (such as the Mayor or Sub-Prefect) who can assist with the collection of applications at a minimum. This measure will help to deter applicants from arriving at the Project gate in search of work and minimize associated health and safety risks.

Under no circumstances will the Project hire any workers at the Project gate; this practice would undermine the procedure for local recruitment causing frustration among communities in the Project's Direct Aol and jeopardize the Project's social license to operate. It could also cause health and safety risks to nearby communities (specifically Nangane) as well as violations of the regulations governing activities in the Classified Forest should applicants erect shelters in the hopes of being first at the gate each morning.

Recruitment procedures will apply to all Project contractors.

4.3 Local Procurement

The Project will prepare a Local Content Plan in order to manage its purchase of goods and services from local suppliers. The Plan will be prepared prior to the start of construction in order to give businesses in the Project's Direct and Indirect Aol time to prepare for and secure procurement contracts. Preparation of the Plan may include carrying out a supplier inventory to identify the goods and services available locally and assess potential supply gaps against the Project's needs. The inventory would be conducted through a process of consultation with local associations and business sector actors. The supplier inventory would be used by the Project to ensure local suppliers are aware of and invited to participate in the bidding process for relevant procurement opportunities. Where supply gaps are identified, the Project would work to encourage existing businesses who can provide the necessary goods and services to establish a fixed presence in the Project area, creating new employment opportunities for residents and diversifying the local economy.

The Local Content Plan will be broadly disseminated through various communication and engagement mechanisms in order to make existing businesses aware of opportunities and to entice new business to relocate or expand into the area.

4.4 Worker Accommodation & Transportation

The Project will not construct any worker housing, meaning all workers, contractors and their personnel will be accommodated in nearby communities.

There are nine communities within the Project's Direct Aol, all of which have limited infrastructure and access to services. This includes a lack of any paved roads or public transportation. As a result, it is unlikely that many migrants will choose to seek accommodation in these communities, and if they do, they will likely settle in the community of Palal, which is located within walking distance (less than 1 km) of the N2. It is more likely that migrants will seek accommodation in the town of Pout or the city of Thies where there is greater access to infrastructure and services. Pout and Thies are located approximately 4.5 and 6 km from the intersection of the Project's access road and the N2 respectively, meaning the intersection can be reached from both communities in less than 10 minutes by vehicle.

While the low probability of influx to communities in the Project's Direct Aol reduces the likelihood of associated negative impacts – such as strain on existing infrastructure, degradation of natural resources, negative socio-cultural influences, it may also be perceived by local residents as a missed opportunity. The provision of rental accommodation and associated services (cleaning, meal preparation, laundry, etc.) is often considered an opportunity for revenue generation within communities close to a project site. Failure to capitalize on this opportunity may generate frustration on the part of local stakeholders and strain relationships with the Project.

In order to minimize the risks and optimize the opportunities associated with influx for host communities, the Project will:

- Allow residents from the Project's Direct Aol to post notices about available accommodation and related services on a notice board for workers at the Project gate;
- Provide transportation for employees residing in any of the nine communities in the Project's Direct Aol to and from the Project site each morning and evening, setting fixed pick-up and drop-off points within 1 km of all communities;
- Encourage contractors to engage with local authorities and community leaders to identify available accommodation for their personnel within the Project's Direct Aol and to provide associated services; and
- Include public infrastructure as a priority area for support through the Project's Social Investment Plan in order to increase the attractiveness of communities in the Direct Aol to migrant workers and offset the additional demand their presence may create.

4.5 Social Investment

The Project will prepare a Social Investment Plan that defines the criteria and procedure for the selection of initiatives that will receive financial or in-kind support from the Project during the construction and operations phases. The Plan will focus on projects that contribute to sustainable development of communities in the Project's Direct Aol and align with the Keur Moussa Commune Development Plan where possible. The Plan will help the Project ensure its investments are aligned with local needs and priorities, thereby increasing the likelihood of sustainable outcomes.

Specific criteria for the selection of community development initiatives to be supported by the Project will be defined in consultation with local stakeholders but are expected to include improvements in public infrastructure and access to services. These investments can help to not only improve living conditions for local residents but also to make the area more appealing to migrants (including Project employees) and offset any additional strain project-induced in-migration could have on host communities. Other initiatives that may be supported by the Project could include measures to help communities benefit from additional opportunities associated with in-migration, such as capacity-building and the provision of capital or materials for the creation of small businesses.

The Social Investment Plan will be finalized prior to the start of construction but should be reviewed and updated over the life of the Project as necessary. This includes potential adjustments required in accordance with changing migration patterns as a result of other economic development in the region, such as the expansion of the AIBD.

5. MONITORING

Given the expected scale of in-migration and associated risks, the Project will not endeavour to assess migration rates and settlement patterns against socio-economic baseline data. However, prior to the start of construction, the Project will undertake a local market study in order to establish a baseline for common household products. The study will be undertaken by the CLO, who will consult women's groups within the Project's Aol on the list of products to be included and who will also provide input on current prices. In order to track changes within the Project's Aol, the products will include only those that are available locally (i.e., can be purchased within the Aol) and not those more commonly purchased in the market in Pout (where prices will be affected by a range of economic factors). The same market data will be collected by the CLO at the same time every year during the Project's construction and operations phases to allow for a year-over-year comparison.

The Project will also utilize the engagement mechanisms outlined in its Stakeholder Engagement Plan (June 2021) to undertake a qualitative monitoring process of influx impacts and the effectiveness of management measures based on stakeholder feedback. This will include:

- Consultation with local and regional government authorities (i.e., Prefect, Sub-Prefect, Mayor, Technical Services) on an as needed basis to share information on the Project, including implementation of influx management measures, and seek input on any necessary adjustments to increase effectiveness and ensure alignment with regional development plans and priorities;
- Engagement with the Monitoring Committee at regular meetings on any observations they have made, concerns they may have, issues that have been reported to them related to influx, or revised/additional management measures they recommend;
- Discussion with community members in the Project's Direct Aol – including identified vulnerable groups specifically - on settlement rates and patterns of new arrivals, effectiveness of associated management measures, and management of risks to community health and safety during periodic focus group discussions and key informant interviews; and
- Monitoring of the Project's Grievance Management System (GMS) and tracking any grievances related to influx to proactively identify and manage any recurring issues or trends.

The tasks above will be carried out by the Project's CLO, who will be responsible for implementation of the Plan and adjustments of the measures herein as required. Engagement and grievance management will be reported on internally and externally, as per the procedures and timelines defined in the Project's Stakeholder Engagement Plan.

6. IMPLEMENTATION

6.1 Roles & Responsibilities

Implementation of the Influx Management Plan and the management and monitoring measures defined herein will be the responsibility of the Project's CLO. This role will be filled by a qualified practitioner who has experience in the design and management of stakeholder engagement programs and social management measures for the private sector in Senegal. He/she will be hired by the Project to work full-time during the construction phase; his/her responsibilities may be reduced during the operations phase depending on the strength of the Project's relationship with local stakeholders and the stability of its social license to operate.

With regards to influx management, the CLO's responsibilities will include the following:

- Engagement with the Monitoring Committee on the proposed management and monitoring measures and incorporation of their feedback into the final Influx Management Plan;
- Ongoing engagement with local stakeholders – including vulnerable groups – on the risks, impacts and opportunities associated with influx and continuous consultation as part of the monitoring process;
- Coordination and roll-out of the management mechanisms defined in the final Influx Management Plan, including dissemination of the Local Content Plan, support of measures related to worker accommodation and transport, and finalization and implementation of the Social Investment Plan;
- Implementation and monitoring of the GMS, including registering and resolving grievances related to influx and identifying any recurrent issues or trends in stakeholder complaints; and
- Reporting to internal and external stakeholders on influx management and monitoring in accordance with procedures outlined in the Stakeholder Engagement Plan.

The CLO will work closely with other members of the Project team and contractors who may have a role in influx management and monitoring measures.

6.2 Timeline

The Influx Management Plan must be finalized prior to the start of construction. This process will involve consultation with key external stakeholders to validate the measures proposed herein prior to finalization. Key management measures – such as the Local Content Plan, Social Investment Plan, and worker accommodation and transportation arrangements – must also be finalized prior to the start of construction. As a result, this process should be initiated as soon as possible to avoid delays to the Project schedule.

Key milestones are as follows:

- Hiring of CLO – no less than 3 months from start of construction;
- Stakeholder consultation on design of social management plans – to be initiated immediately following hiring of CLO and within no less than 2 months from start of construction;
- Finalization of Influx Management Plan, Stakeholder Engagement Plan, Local Content Plan, Social Investment Plan, and worker accommodation and transportation arrangements – no less than 1 month from start of construction; and

Dissemination of and ongoing engagement related to social management plans – immediately following finalization of plans and within no less than 1 month from start of construction. Implementation of the influx management and monitoring measures will continue throughout the construction and operations phases.

6.3 Resources

Costs associated with influx management are expected to include the compensation, transportation, technology and meeting costs associated with the work of the CLO, as detailed in the Stakeholder Engagement Plan, as well as implementation of the Social Investment Plan. Implementation of the Influx Management Plan is not expected to result in any specific costs for the Project.

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