

Seli Hydropower Limited

Seli Hydropower and Indigenous Peoples

Analysis of Seli communities and
international definitions of
Indigenous Peoples

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TABLE OF ABBREVIATIONS

| Abbreviation | Term |
|--------------|--|
| EIB | European Investment Bank |
| ESHIA | Environmental, Social and Health Impact Assessment |
| FPIC | Free, Prior and Informed Consent |
| IFC | International Finance Corporation |
| IFI | International Financial Institutions |
| IP | Indigenous Peoples |
| IPC | Informed Participation and Consultation |
| NEWA | Northern Early Works Area |
| PS | Performance Standard |
| SEWA | Southern Early Works Area |
| WFP | World Food Programme |

1. Introduction

1.1 Scope of this Analysis

The Environmental, Social and Health Impact Assessment (ESHIA) of the Seli Hydropower Project (hereafter 'the project') conducted by Environmental Resources Management (ERM) concluded, on the basis of social surveys and available documentation, that none of the communities are Indigenous Peoples (IPs) as defined by international financial institutions (IFIs). The ESHIA study stated:

It is not expected that the Project will trigger [Performance Standard 7 of the IFC on Indigenous Peoples] since none of the ethnic groups living in the Project area (Fula, Koranko, Mandingo and Limba, Temne, and Krio) are recognised as indigenous by the Government of Sierra Leone.

Seli Hydropower Limited has accepted this conclusion since the time of the ESHIA. However, the environmental and social due diligence conducted by Independent Environmental and Social Consultants (IESC; Mott MacDonald) required an analysis of whether the ethnic groups affected by the project do or do not meet lenders' Indigenous Peoples criteria, and the preparation of a standard response to potential queries about why or why not the project has treated the ethnic groups as IPs. It required an IP narrative to be available for explaining whether IFC Performance Standard 7 and Free, Prior and Informed Consent (FPIC) are triggered or not.

This paper provides the required analysis and narrative. It consists of:

- A summary of the definitions of Indigenous Peoples in international standards of IFIs;
- Identification of the ethnic groups affected by the project;
- Whether these ethnic groups meet the definitions of Indigenous Peoples, and whether FPIC would be required; and
- A conclusion to be used as a standard response to enquiries.

2. IFI Standards and Definitions

The IFC Performance Standard 7 recognizes that:

Indigenous Peoples, as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and vulnerable segments of the population. In many cases, their economic, social, and legal status limits their capacity to defend their rights to, and interests in, lands and natural and cultural resources, and may restrict their ability to participate in and benefit from development. Indigenous Peoples are particularly vulnerable if their lands and resources are transformed, encroached upon, or significantly degraded. Their languages, cultures, religions, spiritual beliefs, and institutions may also come under threat. As a consequence, Indigenous Peoples may be more vulnerable to the adverse impacts associated with project development than non-indigenous communities. This vulnerability may include loss of identity, culture, and natural resource-based livelihoods, as well as exposure to impoverishment and diseases. [Paragraph 1]

Affected Communities of Indigenous Peoples may be particularly vulnerable to the loss of, alienation from or exploitation of their land and access to natural and cultural resources. In recognition of this vulnerability, in addition to the General Requirements of this Performance Standard, the client will obtain the FPIC of the Affected Communities in the circumstances described in paragraphs 13–17 of this Performance Standard. [Paragraph 11]

There is no universal definition of Indigenous Peoples. Indigenous Peoples may be referred to in different countries by such terms as indigenous ethnic minorities, aboriginals, hill tribes, vulnerable and marginalised groups, minority nationalities, scheduled tribes, first nations, or tribal groups.

The following definitions (Table 2.1) are used in the IFC Performance Standard and European Investment Bank standards.

2.1 Free, Prior and Informed Consent (FPIC)

IFC PS7 requires FPIC when a project has impacts on, or relocates indigenous people from, lands and natural resources subject to *traditional ownership* or under customary use, as well as if there are significant project impacts on critical cultural heritage.

EIB requires, in all instances involving indigenous peoples, that an Indigenous Peoples Development Plan is prepared, abiding by the principle of free, prior and informed consent (FPIC) and accounting for, amongst others, (i) the recognition awarded by the state to the indigenous groups or communities affected, (ii) the duty of the state to consult them, (iii) the safeguarding of both their tangible and intangible cultural heritage, (iv) their link to resources and territories, and (v) considerations of benefit sharing arrangements with them.

Table 2.1 Definition of Indigenous Peoples in IFC and European Investment Bank Standards

| IFC Performance Standard 7 – Indigenous Peoples | EIB Environmental and Social Standards 7 – Rights and Interests of Vulnerable Groups |
|---|---|
| <p>“Indigenous Peoples” is used in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees:</p> <ul style="list-style-type: none"> • Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; • Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; • Customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture; or • A distinct language or dialect, often different from the official language or languages of the country or region in which they reside. | <p>Indigenous peoples are defined as a distinct social and cultural group, possessing some or all of the following characteristics in varying degrees (based on ILO Convention 169 and the work of the UN Special Rapporteur on the situation of human rights and fundamental freedoms of indigenous peoples):</p> <ol style="list-style-type: none"> a) Self-identification as indigenous; b) A shared experience of oppression or colonisation; c) Historical continuity within a given region prior to colonisation or annexation; d) Collective entitlement and/or attachment to ancestral lands, territories and natural resources in their habitats and use thereof; e) An indigenous language, often different from the national or regional language; f) Distinct social, economic and political systems; g) Activity in non-dominant sectors of society; h) Distinct languages, spiritual traditions, culture, beliefs and knowledge; i) Land/natural resources-dependent means of existence; primarily self- sufficient production; and j) A shared wish to maintain and develop a distinctive shared identity, spirituality as well as social economic, cultural and political institutions. |

3. Peoples affected by the Seli Hydropower Project

3.1 Ethnic Groups in Sierra Leone

Sierra Leone is ethnically diverse, with 16 different ethnic groups. The predominant ethnic groups are the Temne (35%), Mende (31%), and Limba (8%). The Temne are predominant in northern Sierra Leone and areas around the capital, while the Mende live mostly in south-eastern Sierra Leone and the Kono District. Limba are present in northern Sierra Leone. The fourth group are the Fula (7%).

Other major ethnic groups include: the Mandingo (2%), who are descended from Guinean traders; the Kono (5%), who also descended from Guinean migrants; and the Krio (2%) people, who are descendants of freed African American, West Indian and liberated African slaves. Smaller ethnic groups include: the Kuranko, who arrived in the area around 1600; the Loko (2%), who are native to Sierra Leone; the Kissi, and the Sherbro.

Sierra Leone’s 1991 Constitution does not explicitly identify indigenous groups or make provision for the protection of indigenous rights and identity, aside from encouraging government to promote indigenous languages. Historically, only the Limba tribe is considered entirely indigenous to Sierra Leone, as all other groups can trace their migratory patterns from present day Guinea, Mali and Liberia.

Fula are cattle herders present across much of West Africa, migrating seasonally and therefore lacking any form of land ownership. It is thought that the Fula in Sierra Leone are descendants of migrant settlers from Guinea in the 17th and 18th centuries. Because of their nomadism, they are popularly defined as ‘foreigners’ despite having had a presence in Sierra Leone for over four centuries (EIB, Bumbuna 2 Hydroelectric Power Plant, Sierra Leone: desk-based conflict analysis). People of other ethnicities are more likely to have customary rights to the land they farm, whilst Fula pastoralists have none. In the wider region, they are often subject to violence (for example in a massacre of 150 persons in Mali in 2019), possibly due to the competition with local farmers for land for cattle. Fula people limit the time and monetary investment they make in their houses, keeping structures simple. This is attributable to the extended time that Fula communities spend away from their structures, which can range from half a year to over a year as transhumance routes evolve in accordance with climatic conditions and the availability of pasture.

3.2 Ethnic Groups in the Project Area

The project is situated in Tonkolili and Koinadugu Districts, both of which are ethnically diverse. Koinadugu is one of the most ethnically diverse districts in the country, including Koranko, Mandingo, Limba, and Fula ethnic groups. This diversity has resulted from in-migration and inter-marriage.

Limba and Koranko are the most prevalent ethnic groups in the project area, with Limba predominating in the ‘Early Works Areas’ and the western part of the inundation area, and Koranko predominating towards the eastern part of the inundation area.

3.2.1 Project Early Works Areas

Out of the 24 households that will be physically-displaced from the Southern Early Works Area (SEWA), 19 are Limba, 1 Mende, and 4 Koranko. The presence of Mende and Koranko is likely the result of inward migration that the SEWA has seen in recent times. In the Northern Early Works Area (NEWA), all affected households are Limba.

Households in SEWA will be resettled to an area within the same community. Households in NEWA will be relocated to an area and village that is also a Limba community.

3.2.2 Inundation Area

During consultation conducted for the project ESHIA, 49% of villages in the inundation area stated Koranko as their primary ethnic origin, 21% Limba, and 9% Fula. Other minority ethnic groups identified in the ESHIA in the inundation area included Temne, Mandingo and Krio. Village profiles also indicated a high presence of in-migrants: approximately 50% of villages mentioned the presence of migrants or other ethnic groups.

SHPL is conducting household surveys in the inundation area for resettlement planning. To-date SHPL has surveyed 1 out of 3 geographical sections (the Kondembaia section), surveying 139 households consisting of 673 persons. The ethnicity of surveyed households is indicated in **Error! Reference source not found.** Limba predominate overall, and especially in sub-section A (97.8% of the population), while Koranko predominate in sub-sections B and D (84.4% and 77.1% respectively). Sub-section C is most diverse, including Fula and the ethnicities. Temne and Mende are present but in very low numbers.

The ESHIA identified 4 Fula communities among project-affected communities within and outside of the reservoir area – Malonde, Kaltahill, Badala 2, and Konderoh, and located them on a map (Figure H2.9, Annex H to the ESHIA). In addition, there is now a settlement known as Fula Town, on the southern outskirts of Kondembaia. These settlements are summarised in Table 3.1. Fula communities settle in the project area during the dry season, but are based around Lake Sonfon during the wet season, as it provides mountainous terrain with plenty of land for grazing, reducing the potential for conflicts with farmers.

Figure 3.1 Numbers of persons to be physically-displaced, by ethnicity in four sub-sections of the Kondembaia RAP planning section

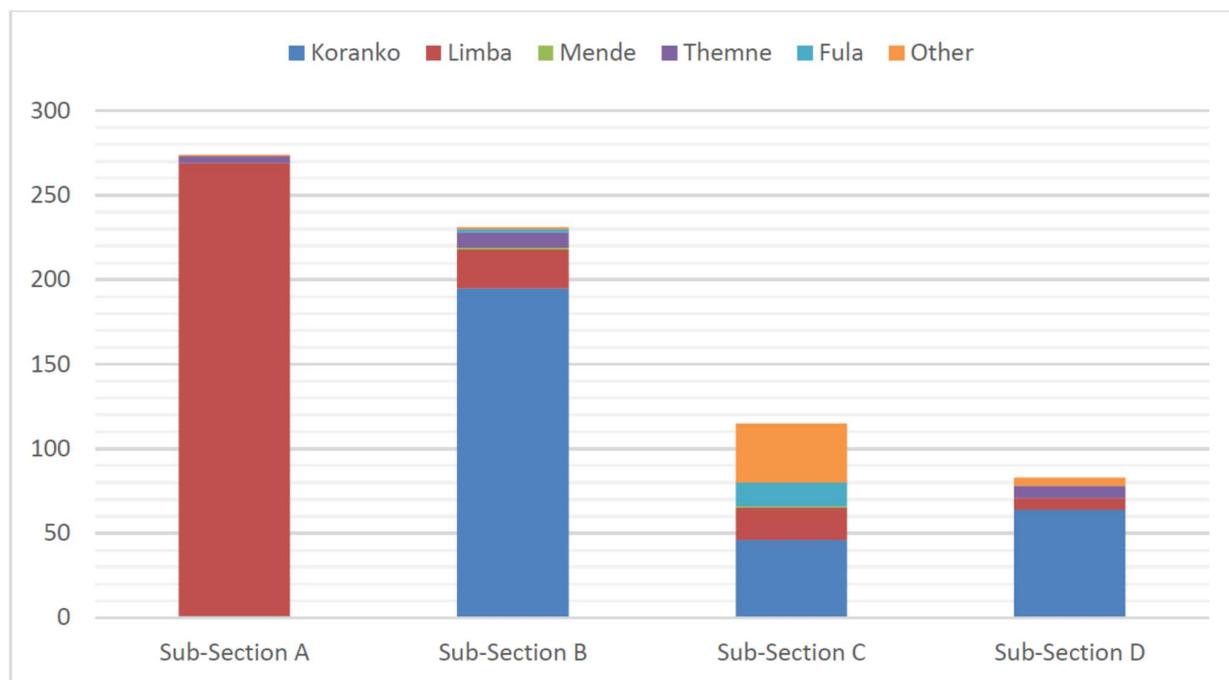


Table 3.1 Fula settlements in the project area

| Settlement | Households | Persons | Comment / How affected? |
|----------------------------------|------------|---------|---|
| Within the reservoir area | | | |
| Malondefeh | 8 | 40 | The wet season base of these households is Kenkokehma, outside of the reservoir area. They move to Malondefeh, which is around 3 miles from Kondembaia, early in the dry season in December, settle there for few months to graze their cattle, and depart early in the rainy season in May. During the ESHIA study, the Malondefeh community reported that each household sells between three and seven cattle a year for USD 1.5 to 2 million Leones (US\$ 380-400) each. They also engage in small-scale backyard gardening for subsistence. |

| | | | |
|--------------------------------------|----|----|---|
| | | | They may be economically-displaced by the loss of dry season grazing land, and will require replacement grazing land, and relocation assistance. Note that it may be possible to access their grazing lands during the dry season, as they will be in the draw-down zone of the reservoir. |
| Badala 2 | 5 | 26 | May be economically displaced if their grazing lands are within the reservoir area, and may require relocation assistance. |
| Outside of the reservoir area | | | |
| Kaltahill | 3 | 12 | May be economically displaced if their grazing lands are within the reservoir area. |
| Konderoh | 5 | 25 | May be economically displaced if their grazing lands are within the reservoir area. |
| Fula Town | 12 | 60 | Located between Kondembaia and Badala town, about 2.5 miles to the south of Kondembaia. The settlement was initially established as a temporary dry season settlement in 2005, but it had become a permanent residential town, with permanent housing, by 2017. People practise backyard gardening, and a minimal level of subsistence upland farming as well as cattle grazing. Affected indirectly by the project, in a similar manner as other residents of Kondembaia, possibly some economic displacement if any of their grazing land is within the reservoir area. |

3.3 Chiefdoms in the Project Area

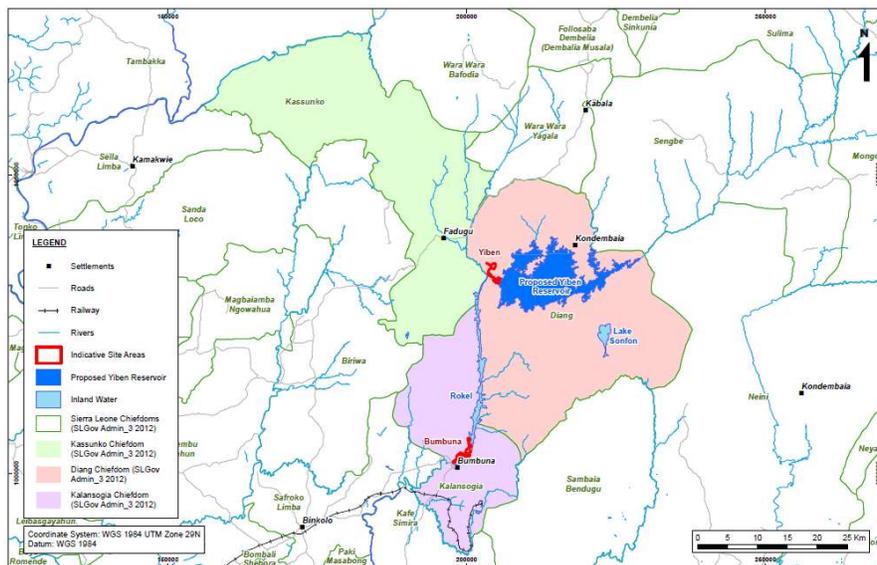
Within the districts of Tonkolili and Koinadugu, the project affects four chiefdoms:

- Diang and Kasunko Chiefdoms in Koinadugu District; and
- Kalantheta and Dasongoia in the Tonkolili District (amalgamated as Kalansongoia).

Diang and Kasunko have medium food insecurity, and Kalansongoia is one of the most food insecure chiefdoms in Sierra Leone, based on World Food Programme analysis. All lack improved access to social and economic infrastructure, and have poor livelihood opportunities.

Figure 3.2 shows the locations of the chiefdoms, and Box 3.1 provides a description of the history of the chiefdom system.

Figure 3.2 Chiefdoms in the project area



Box 3.1 Chiefdoms in Sierra Leone

Chieftaincy in Sierra Leone was established in 1896, when Governor Cardew transformed society by empowering a set of Paramount Chiefs as the sole authority of local government in the newly created Sierra Leone Protectorate. The chiefs remained effectively the only institution of local government until the World Bank sponsored creation of a system of local councils in 2004. Under the system, chiefs are elected for life by a Tribal Authority made up of local notables. Only individuals from the designated “ruling families” of a chieftaincy, the aristocracy created and given exclusive right to rule by the British at the initiation of the system in 1896, are eligible to become Paramount Chiefs.

After the declaration of the Protectorate, the colonial government established a formal system of succession in the chieftaincy. Paramount Chiefs rule for life, and are elected by vote of the “Tribal Authority”, a group comprising the members of the chiefdom elite. The authority also includes the “chiefdom speaker”, an aide to the chief. Chiefdom speakers will often temporarily take on the role of “regent” or caretaker once a

chief dies. At the turn of the 20th century these authorities were small groups of approximately 5 to 15 headmen and “sub-chiefs” of the various towns and villages within the chiefdom. Their numbers have expanded over time. By the 1950s voting roles in Paramount Chief elections comprise 40 to 60 members. The 2009 Chieftaincy Act provides that there must be one member of the Tribal Authority for every 20 taxpayers. Still, however, the tribal authority comprises mostly members of the rural elite; they are not elected by these taxpayers and neither is the chief.

3.3.1 Diang Chiefdom

Diang Chiefdom is one of eleven Chiefdoms in Koinadugu district whose inhabitants are predominantly Kuranko, and also Yalunka, Fula and other ethnic groups. The Chiefdom is comprised of seven sections including: Kondembaia, Sokurela, Sosanfeh, Kandabifeh, Foullah, Kongbailfeh and Mandrifeh Sections.

The Diang chiefdom traces its history back many centuries to the arrival of three brothers who are said to have come from what is today Bamako, Mali. The elder was named Manse Yire and the two younger were called Manse Mamuru and Manse Saramba. With them, they brought their symbol of authority the Manse Kina, or “chieftaincy stone”. They conquered the residents of the area and settled around Lake Sonfon. The brother Manse Saramba became first leader of the chiefdom.

The first chief to be recognized by the colonial British government was Ferenke Koroma, who is thought to have been descended from the three brothers. The current chief is Sheku Magba Koroma II, who was elected in 1996. The Ferenke family traces the lineage of the first paramount chief, and has its headquarters at Kondembayia. The Magba family traces the lineage of the second chief of Diang, Magba Koroma I, who was the younger brother of Ferenke. Their chiefdom headquarters is also at Kondembayia.

Table 3.2 Facts and figures of affected Chiefdoms (SSL 2015 Census)

| | Diang | Kasunko | Kalansongoia |
|--|--------|---------|--------------|
| Area (km ²) | 1,064 | 1,140 | 450 |
| Population | 29,063 | 24,796 | 35,864 |
| Male | 14,699 | 11,734 | 17,976 |
| Female | 14,364 | 13,062 | 17,888 |
| Population density (per km ²) | 27.32 | 21.75 | 79.75 |
| WFP food insecurity vulnerability ranking (2015) | 7th | 5th | 4th |

3.3.2 Kasunko Chiefdom

Kasunko chiefdom is an amalgamation of four chiefdoms, Kasunko, Thamiso, Kakaya and Kakaley. Each of these chiefdoms traces its origins to a related group of Limba warriors who conquered the Loko in the area during the 15th century. The current chief is Lamina Baio Serry II, a Limba and Muslim who was elected in 2002 at age 63. Available records indicate that Chief Sara Baio was the first Paramount Chief of Kasunko Chiefdom. The chiefdom is now comprised of eight sections: Kasunko, Kakelay, Kagbokobo, Kayaka, Tamiso I, Tamiso II, Mandingo, and Fullah.

3.3.3 Kalanthuba and Dasongoia Chiefdoms (Kalansongoia)

Kalanthuba and Dasongoia are two of the nineteen chiefdoms in Tonkolili district. The two chiefdoms, were amalgamated as Kalansongoia, but have recently been re-designated as separate chiefdoms. The chiefdom is comprised of nine sections: Kasokira, Kamakila, Kamatha, Kakaylain, Fuladugu (all in Kalanthuba), Lower Section, Upper Section, Kemadugu and Bassaia (Dasongoia).

Kalantuba traces its origins to a warrior called Baio Yembah. It is said that he came from Biriwa and was supported with arms and warriors that were a gift of the powerful Chief Suluku of Biriwa. He was the first person to be recognized as chief of Kalantuba. Dansogia traces its origin to a hunter called Dansogo, which in Koranko is a greeting for a hunter who has killed a great amount of game. He is said to have come much earlier than Yembah, from a place called Gberh Tubakoh in Mali. On his way, he arrived in the area and found people in a cave hiding from battle. He volunteered and protected them, serving as something of a caretaker chief until his grandson was made paramount chief of the chiefdom.

The current chief is Alimamy Yallah Koroma III, a Koranko elected in 2002. The chiefdom is notable for being both the host of the Bumbuna I hydroelectric project, and the African Minerals iron ore mine. The chiefdom is supposed to receive rents from both projects, but officials claim not to have been paid for the latter.

4. Are these Peoples Indigenous Peoples?

4.1 Limba, Koranko and Others

The Limba and Koranko are the majority of people affected by the project, with the Fula being the next largest group. People in the affected communities of a number of other ethnicities – Mandingo, Krio, Yalunka, Loko, Temne, and Mende – together form a larger group than Fula, but the numbers of people of each ethnicity are very small.

The Limba, Koranko and these other ethnicities are not considered to have customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture in Sierra Leone (i.e. the third characteristic in the IFC definition, and the sixth in the EIB definition). They share economic, social and political institutions, including the chiefdom system. Broadly, very few ethnic groups in Africa are considered to meet international definitions of indigenous peoples, and those that do have a highly distinct livelihood or culture.

4.2 Fula

Fula or Fulani are considered indigenous in Burkina Faso, the Central African Republic, Mali, and Niger (International Working Group on Indigenous Affairs – The Indigenous World 2020)¹. Whether they should be considered as Indigenous Peoples in the project area in Sierra Leone is therefore considered further in this section.

The following table (Table 4.1) presents a brief analysis of whether the Fula in the project area meet the criteria in the definition of Indigenous Peoples in IFC PS7 and the EIB Environmental and Social Standard 7. On the basis of this analysis, the Fula people in the project area do not meet the definition of Indigenous Peoples. This is principally because the Fula as a people do not have a collective attachment to geographically distinct habitats or ancestral territories in the project area, and they do not have political institutions that are separate from those of the mainstream. In most of the cases where the Fula do meet the definitions' criteria, the same can be said of other ethnic groups – self-identification, language, and experience of colonialism.

Furthermore, if we were to assume that Fula meet the definition, FPIC would not be required under PS-7, as the lands and natural resources they use that will be project-affected are not under their traditional ownership or customary use, and there are no project impacts on critical cultural heritage. The Fula in the project area are relatively recent in-migrants, and pay an in-kind rental payment to the Diang chief. They would be displaced from dry season grazing lands used for approximately 5 months per year on a transactional basis.

Table 4.1 Fula and the Criteria Defining Indigenous Peoples

| Criteria | Yes/No | Conclusions |
|---|--------|---|
| IFC: Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; EIB: Self-identification as indigenous. | Yes | Fula do self-identify as members of a distinct group, and this identity is recognised by others, formally in other countries in the region but informally only in Sierra Leone. However, Fula are not formally recognised as indigenous in Sierra Leone, as the Government of Sierra Leone has not identified any ethnic groups as Indigenous Peoples. |
| IFC: Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories. EIB: Collective entitlement and/or attachment to ancestral lands, territories and natural resources in their habitats and use thereof. | No | While there may be ancestral territories of the Fula in other parts of the region, lands in the project area are not geographically distinct or Fula ancestral territories. The presence of Fula in the project area is relatively recent: the first Fula to settle in Malondefeh did so in the late 1990s; Fula Town was initially settled in 2005. This is further underlined by the transactional relationship the Fula in the project have with the land and the Diang chiefdom. Fula obtain permission from the Chief to settle for a period of time at a certain cost. For example, in Malondefeh, the Fula community has an agreed area of land use of seven square miles at a price of one cow per year. |
| IFC: Customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture. EIB: Distinct social, economic and political systems. | No | Fula in the project area access and use the same institutions as others in the chiefdom. They report to the Section Chief for the area and when necessary revert to the Paramount Chief of Diang Chiefdom to resolve disputes (which most often relate to their cattle grazing on people's farmlands or theft of cattle). They have access to the same social infrastructure, including health facilities, community health centres, and the markets in Kondembaia. |
| IFC: A distinct language or dialect, often different from the official language or languages of the country or region in which they reside. EIB: An indigenous language, often different from the national or regional language; Distinct languages, spiritual traditions, culture, beliefs and knowledge. | Yes | Fula have their own language and culture. However, this is true of all ethnicities in the project area and Sierra Leone, and is not unique to the Fula. |
| EIB: A shared experience of oppression or colonisation; historical continuity within a given region prior to colonisation or annexation. | No | Fula do not have a shared experience of oppression or colonisation in Sierra Leone that is separate from the experience of all ethnic groups. |
| EIB: Activity in non-dominant sectors of society; Land/natural resources-dependent means of existence; primarily self-sufficient production. | Yes | Fula are dependent on natural resources and practice a system of production that is distinct from all other ethnic groups in Sierra Leone, i.e. transhumant cattle-raising. |

¹ 'Fula' is the term used in Manding languages in area of Mali and west to Guinea and Sierra Leone. 'Fulani' in English is borrowed from the language of Hausa peoples (in Niger and northern Nigeria).

| | | |
|---|----|--|
| EIB: A shared wish to maintain and develop a distinctive shared identity, spirituality as well as social economic, cultural and political institutions. | No | Fula people may have a shared wish to maintain their distinctive identity, but they do not have separate political institutions in Sierra Leone. |
|---|----|--|

5. Conclusion

This paper has considered whether people affected by the Seli Hydropower Project may be considered as belonging to any Indigenous Peoples, based on the definitions of Indigenous Peoples applied in international environmental and social standards, specifically those of IFC and EIB. In conclusion:

- The Limba and Koranko, to which the majority of project-affected people belong, and a number of other ethnic groups to which some other project-affected belong, do not have customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture in Sierra Leone, and are not Indigenous Peoples.
- A number of project-affected people are Fula (a little over 30 households including those that may be economically-displaced), but they are relatively recent arrivals in the project area, so the project does not displace them from their traditional or customary lands, and they share social and political institutions such as the chiefdom system with other ethnic groups.
- For most of the criteria used to define Indigenous Peoples, the Fula are not distinguished from other ethnicities, which also self-identify as a distinct group, have a distinct language and cultural and wish to maintain these, and a shared experience of colonisation. For these reasons, Fula in the project area, and possibly Sierra Leone, are not Indigenous Peoples.
- If it was assumed that Fula are Indigenous Peoples, it still would not be necessary for the project to achieve Free, Prior and Informed Consent (FPIC) because the land that will be affected by the project are not ancestral or historical lands under Fula traditional ownership or customary use.
- The project has applied, and will continue to apply, Informed Consultation and Participation, for all ethnic groups.
- The key area in which Fula, including those in the project area, are different from other ethnic groups, is their transhumant livestock-raising system. This will make them more vulnerable to project impacts, especially the loss of grazing land. This underlines the need to apply international standards on vulnerable people – especially EIB Standard 7 on the Rights and Interests of Vulnerable Groups.
- This requires that resettlement planning, implementation, and monitoring take full account of the livelihoods of affected Fula people, for example in ensuring that replacement grazing land is made available. It requires that the risk of conflict between Fula and settled farmers of other ethnicities is given sufficient attention and managed effectively through land allocation and access planning. It also requires that benefit-sharing, through the project's Community Development Action Plan (CDAP), is extended to Fula people and does not exclude them due to their distinct language and migratory lifestyle.