Evidence-Based Review of Mining-Induced Resettlement and Compensation Practices in Minambe Ward of Mokambo, Mufulira Mining District, Zambia

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Executive Summary

This study examines displacement and compensation practices associated with the Changfa Resources mining project in Minambe Ward, Mokambo, Mufulira District, Zambia. It fills an evidence gap on how mining-induced displacement and cash compensation are experienced where official information is limited and livelihood impacts remain unresolved. Based on international standards such as the International Finance Corporation (IFC) Performance Standard 5, the findings suggest that the process did not meet key expectations on meaningful consultation, replacement-value compensation, livelihood restoration, overall protection of economically displaced households, and access to remedy. The report is intended to inform government authorities, mining companies, civil society organisations, traditional leaders, and development partners so they can strengthen the protection of mining-affected communities in resettlement and compensation processes.

The study finds that the compensation process was largely state-led, cash-based, and insufficiently responsive to affected households' realities. The local municipality was responsible for convening meetings, communicating with communities, verifying eligibility, coordinating valuation with the relevant department in Kitwe and facilitating payments. Company officials were reportedly largely absent from direct engagement, contributing to confusion over responsibility and accountability.

Consultation was limited. Although many households attended a limited number of meetings, respondents described them as mainly informative rather than participatory. Community members reported that they were informed after key decisions had been made and had little opportunity to influence land acquisition, displacement, valuation, or compensation decision-making. They called for earlier engagement, more time to understand displacement implications, and stronger representation by trusted local leaders.

Eligibility and compensation outcomes were uneven. Households with formal documentation for residential plots, housing structures, or farmland were more likely to be recognised and, in some cases, better compensated. By contrast, many economically displaced households, including farmland users and renters without formal documentation or with customary ownership, were excluded despite losing access to land or livelihood sources. This disadvantaged households dependent on customary or undocumented land use.

The study also identifies weaknesses in valuation transparency and compensation. Local officials indicated that valuation considered market value, structures, crops, trees, and land improvements. However, most surveyed households either did not understand or were unsure how rates were calculated, and no respondent clearly understood the process. Respondents were also offered cash only, even where land-for-land arrangements would have better supported farming livelihoods.

Livelihood impacts were significant. Compensation was commonly used for immediate needs, including farming and livestock activities, school fees, and land purchase or rental, but was insufficient to fully cover these investments and communities had to supplement it with their own resources too, when possible. By the time of the survey, most respondents reported that the cash component had been exhausted, even where some value remained in assets (livestock, land, etc.). For many farming-dependent households, compensation did not restore nor improved pre-displacement living conditions or livelihood security. Respondents predominantly reported land scarcity, reduced income, and food insecurity, leading to heightened vulnerability in the community. Women emphasised challenges linked to household survival, food insecurity, and loss of farming land, while youth highlighted issues around exclusion from decision-making, lack of jobs, dependency, and uncertainty about future livelihoods.

The absence of a formal grievance redress mechanism was another major concern. Respondents reported that they did not know where to take complaints, while CSOs indicated that concerns were raised informally through municipality offices without a clear, documented, and accessible process. This limited access to remedy and reinforced dissatisfaction, mistrust, and exclusion.

The study raises environmental and human rights concerns, including reported dust exposure linked to construction and transport, unsafe water, and close proximity of mining infrastructure to homes and community spaces. These issues suggest that displacement impacts extend beyond compensation and require further rights-based environmental, health, and social investigation.

Minambe should not be treated as a closed case. Most impacts remain unresolved, and district-level information indicates that further displacement-related processes are ongoing in Mokambo. Four priority actions are recommended: adopt and enforce a binding resettlement framework aligned with international standards; ensure early and meaningful consultation throughout the project cycle; move beyond cash compensation and include livelihood restoration, especially for land-based livelihoods; and establish formal, accessible grievance mechanisms for remedies.

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CEJ	Centre for Environment Justice
CEC	Copperbelt Energy Corporation
CSO	Civil Society Organization
DC	District Commissioner
DIHR	Danish Institute for Human Rights
DMMU	Disaster Management and Mitigation Unit
DRC	Democratic Republic of the Congo
EIA	Environmental Impact Assessment
FGDs	Focus Group Discussions
GDP	Gross Domestic Product
IFC	International Finance Corporation
KIIs	Key Informant Interviews
MIDR	Mining-Induced Displacement and Resettlement

Introduction

1.1 Mining context in Zambia and impacts of mining-induced displacement

Zambia is endowed with a diverse range of mineral resources, including copper, cobalt, lithium, manganese, gold, and platinum group metals. These resources have played a defining role in the country's economic development, positioning Zambia as an important supplier of minerals to regional and global markets. For more than a century, mining has contributed to industrial growth, infrastructure development, employment creation, government revenue, and foreign investment, while also shaping settlement patterns and land-use dynamics in mining regions such as the Copperbelt and North-Western Provinces (Sikamo et al., 2016; World Bank, 2020; Ministry of Mines and Mineral Development, 2021).

Copper remains the cornerstone of Zambia's mining economy and continues to account for the largest share of mineral export earnings. According to PwC's Zambia Mining Report 2024, copper continues to underpin government revenue and foreign exchange inflows. Recent statistics from the Zambia Statistics Agency show that refined copper export earnings increased by 31.2%, rising from K15.9 billion in September 2025 to K20.8 billion in October 2025, while export volumes grew by 26.1% during the same period (Zambia Statistics Agency, 2025). Overall, the mining sector contributes an estimated 70–80% of export earnings and more than 10% of Gross Domestic Product, with large-scale copper mining concentrated mainly in the Copperbelt and North-Western Provinces (Government of the Republic of Zambia, 2021; World Bank, 2019).

Zambia has also set an ambitious target to increase copper production to 3 million metric tonnes annually by 2031. This target, announced by the Ministry of Mines and Mineral Development in 2024, forms part of the government's broader strategy to position mining as a driver of economic growth, job creation, and industrial development. The strategy builds on current production levels of approximately 800,000–900,000 tonnes per year and seeks to attract new investment, improve infrastructure, and support policy reforms. Within this policy context and given Zambia's emphasis on foreign direct investment and strengthened economic relations with China, Chinese companies have become increasingly prominent in Zambia's mining sector, particularly on the Copperbelt (Republic of Zambia, 2022; Transparency International Australia, 2024).

However, sustained investment in mineral extraction has also been accompanied by extensive development of supporting infrastructure, including access roads, electricity transmission lines, processing plants, tailings storage facilities, and worker settlements (IIED, 2013). These developments have significant spatial, social, and livelihood implications. Mining-related displacement is not limited to the physical footprint of mines; it may also arise from ancillary infrastructure that crosses customary land, farming areas, residential settlements, and community spaces. Such displacement can disrupt livelihoods, weaken land tenure security, and alter settlement patterns, particularly in smallholder and peri-urban communities (Ndulo, Mudenda and Kasonde, 2018). Similar dynamics have been documented in mining districts such as Solwezi, Kalumbila, Mufulira, and Chingola, where land acquisition for mining expansion has resulted in both physical and economic displacement (Tiamgne et al., 2022; Kumwenda and Chileshe, 2021).

A growing body of literature on mining-induced displacement and resettlement highlights persistent challenges relating to compensation adequacy, consultation, valuation transparency, livelihood restoration, and access to remedy. For example, research on displacement linked to mining expansion in Solwezi District found that compensation packages were insufficient to restore livelihoods, particularly where compensation was not accompanied by structured resettlement planning, livelihood support, or post-compensation monitoring (University of Zambia, 2024; ACEP, 2017; Ndulo et al., 2018). Such findings are consistent with broader evidence from Zambia and the Southern African region showing that cash compensation alone often fails to restore pre-displacement living standards, especially where affected households depend on land for farming, food security, and income generation (IIED, 2013; World Bank, 2019).

These challenges are closely linked to gaps in Zambia's institutional and legal framework for land acquisition, displacement, and resettlement. Although the Constitution and the Lands Acquisition Act provide for compensation in cases of compulsory land acquisition, Zambia has lacked a dedicated and legally binding statute specifically regulating mining-induced displacement and resettlement in line with international safeguard frameworks. The revised National Resettlement Policy (2024), together with its implementation plan, provides an important policy framework for resettlement governance across sectors. However, because it operates as policy guidance rather than enforceable legislation, it does not independently create binding legal obligations for mining-induced displacement. This may contribute to inconsistent implementation across projects. The reported approval in principle of the proposed Resettlement Management Bill, 2026, signals a possible transition towards a stronger statutory framework. If enacted with robust human rights, environmental, and social safeguards, the Bill could strengthen protection for affected communities and improve alignment with international standards such as IFC Performance Standard 5 and the World Bank Environmental and Social Standards (Cabinet of the Republic of Zambia, 2026).

Resettlement and compensation processes generally involve multiple actors, including mining companies, government ministries, district councils, traditional authorities, and affected households. However, studies suggest that coordination among these actors in Zambia is often weak, while affected communities are frequently engaged late in the project cycle, limiting meaningful participation (Ndulo et al., 2018; Parliament of the Republic of Zambia, 2019). Civil Society Organisations (CSOs) have also noted that households without formal land documentation are particularly vulnerable to exclusion, undervaluation, or inadequate compensation, even where they rely on the affected land for farming, housing, or other livelihood activities (ACEP, 2017). Recent legal actions brought by communities near large-scale copper mines in North-Western Province further illustrate continuing disputes around involuntary resettlement, consultation, valuation, and compliance with social and environmental safeguards (Mining Focus Africa, 2025).

Within this broader context, mining-related displacement in Zambia is increasingly characterised by cash compensation without planned physical resettlement or comprehensive livelihood restoration. This approach often transfers the burden of rebuilding livelihoods to affected households themselves, even where access to replacement land, markets, employment, and basic services is limited. The Minambe case therefore provides an important opportunity to examine how these broader governance and implementation gaps are experienced at household level in a mining-affected community.

It is against this backdrop of mining expansion, infrastructure-driven displacement, and persistent governance gaps in resettlement and compensation practices that this monitoring study in Minambe Ward of Mokambo, Mufulira District, was conducted. The study contributes empirical evidence to policy and advocacy discussions on responsible business conduct and the protection of the rights of mining-affected communities. Its scope is deliberately focused on post-compensation household experiences, reported impacts, and community perceptions of fairness, transparency, and adequacy. It does not seek to evaluate long-term resettlement outcomes or provide a legal audit of compliance, but rather to document how affected households experienced the compensation process, how this compares to international standards, and what it reveals about gaps in consultation, livelihood restoration, grievance handling, and protection of economically displaced households.

1.2 Mokambo-Minambe study area and community description

Mokambo is a peri-urban border border settlement area in Mufulira District, Copperbelt Province, situated directly on the Zambia–Democratic Republic of the Congo (DRC) border (Figure 1). Official sources identify Mokambo Border Post as a crossing point linking Zambia to the DRC and place it about 20 kilometres from Mufulira town. Current road and border infrastructure works on the Mufulira–Mokambo route further confirm its continued importance as a transport and border-access corridor in the district (Road Development Agency, 2024). Mokambo is characterized by residential settlements, agricultural land, and open spaces. The study was conducted specifically in the Minambe Ward of the Mokambo (Figure 1).

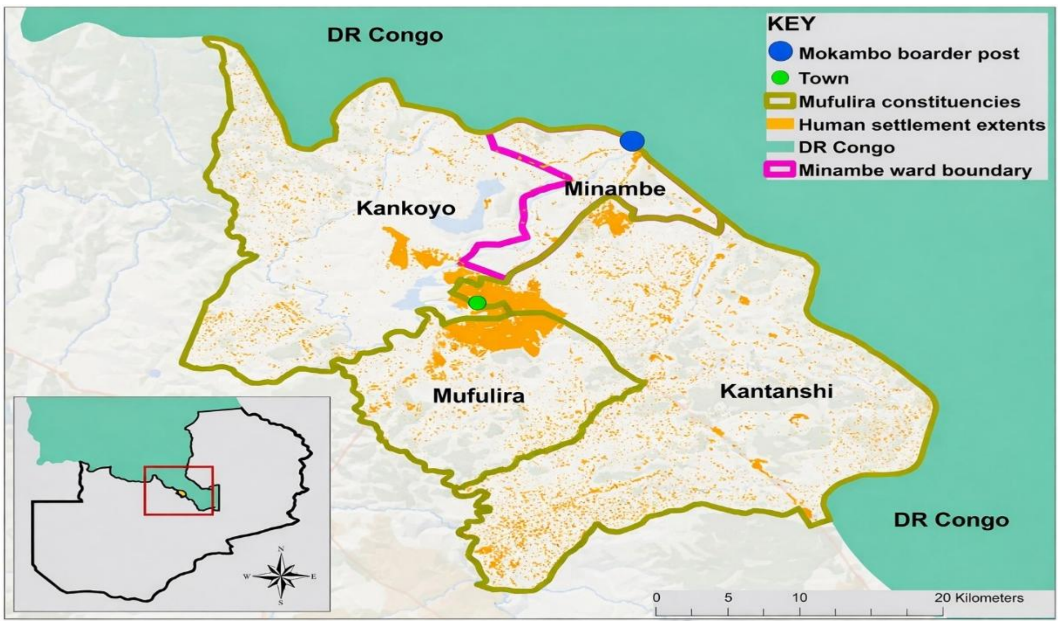

Figure 1: Showing the location of the study area (Minambe) in Mokambo, Mufulira district

Source: Author's own compilation using data from Zambia Statistics Agency (2022)

The Mokambo–Minambe area has in recent years become a site of mining development associated with the operations of Changfa Resources Company. As the wider Copperbelt has a mining history of more than a century, with major exploration beginning in the 1920s and the development of Mufulira mine by Mopani Copper Mining starting in 1933, the Mokambo–Minambe area presents a case of recent mining expansion. Public mining sector documents identify the Mokambo copper/cobalt project in Mufulira as a project of Changfa Resources Limited, and public reporting indicates that Changfa has reportedly pursued an underground copper project around Mokambo in Mufulira's Minambe Ward since August 2014 (Mining News Zambia, 2014; Kříbek et al., 2023; Banda, 2015; Mumba, 2014). In the present study, the focus was on households directly affected by the displacement and compensation process associated with mine-site development in the Mokambo–Minambe area.

According to field observations and community accounts collected for this study, the terrain in Mokambo and Minambe is relatively flat, with gravel roads and increasing construction activity linked to mining. Field observations further indicate that social infrastructure in Mokambo remains limited. Access to basic services, particularly clean water, remains inadequate, and many households rely on shallow wells due to the limited availability of boreholes. The area nevertheless has basic public service infrastructure, including a primary school, a secondary school, and a government-built clinic.

The community in Minambe Ward has a diverse population of approximately 5,226 residents (Central Statistical Office, 2022). The community engage in mainly subsistence maize farming, small-scale trading and artisanal copper mining, and maintain strong cultural and economic ties with neighboring community on the Congo side of the boarder, fostering a unique blend of Zambian and Congolese relationships.

1.3 Changfa Resources' operations in Zambia

Based on open-source information and documentation from the Zambia Revenue Authority gathered for this report, Changfa Resources Company ('Changfa') appears to be a 100% Chinese-owned entity operating in Zambia under its own name. Zambia Revenue Authority records reviewed for this report indicate that the business is registered for tax purposes in Zambia as a sole proprietor. However, no further information could be found on this company. This limitation is significant, as public access to comprehensive ownership details remains restricted. Ongoing reforms in beneficial ownership disclosure in Zambia have not fully resolved this issue and available open-source information does not provide more clarity on the company's ownership structure.

More broadly, Chinese-owned mining companies' operations in Zambia have raised recurring concerns regarding environmental management, labour and environmental compliance, transparency, and community relations (Human Rights Watch, 2011). Similar concerns arose during the Centre for Environmental Justice's (CEJ) efforts to obtain information on Changfa's structure and operations during fieldwork in Mufulira. Despite being given a direct contact by the District Commissioner of Mufulira, the CEJ team could not exchange or meet with a company representative. Field observations also indicated a minimal company presence on site. These challenges hindered CEJ's ability to obtain detailed information on Changfa's ownership and operations in Zambia, highlighting broader issues of corporate transparency and communication regarding its activities.

1.4 Minambe displacement and compensation process status

Minambe Ward was selected for this monitoring study because it presents a recent and ongoing case of mining-induced displacement that has attracted local public attention and raised concerns about the fairness, transparency, and adequacy of compensation. The site was considered particularly relevant because the displacement and compensation process is still unfolding and some impacts and complaints raised by the displaced community remained unresolved. As such, Minambe provided an important opportunity to examine how displacement and compensation are being managed in practice and how affected households are experiencing the process.

Minambe Ward covers a large geographic area and has a population of 5,226 people (Central Statistical Office, 2022). Results from the study show that the local municipality, as the district's land custodian, played a central role in communicating about displacement, identifying affected households, and facilitating compensation between the company and the community. The municipality also organised and led meetings on land acquisition and displacement, serving as the principal intermediary between Changfa Resources and the local community.

CEJ research team spoke to affected community members that are established in a broad settlement in Minambe Ward, settlement that was not impacted by physical displacement and that is located less than 10 meters from the mine infrastructure. With regard to the displacement process under study, according to community accounts, more than 500 households of this settlement were affected by an **economic displacement process**, as they lost land located near the mine boundary, that they used for farming and cultivating or acquired to build future housing structures. Out of these 500 households, a few households were also affected by **physical displacement** as they had to give up their newly built houses on the residential plots they had recently acquired near the mine border, in which they had just moved and started living. There are no official records of how many households were physically displaced and CEJ team could not get an estimate, as some of these households moved back to the broader settlement Minambe Ward but others moved to other settlements in the area or across the border with DRC. None of them were physically resettled by the company or the government. In addition, only about 200 out of the 500 affected households reportedly received compensation, in cash. These households were mostly those with residential structures or plots directly affected by mine site development, leaving many households that lost farmland excluded from compensation. Many respondents relied on local leadership structures to access alternative farmland or residential plots. To summarise, the displacement process therefore resulted mainly in the loss of farmland and some undeveloped or partially developed residential plots.

According to community accounts, the consultation process led by the local municipality started in 2024 and compensation packages were received (for those with residential plots) around mid-2025. Many other households who used land for farming have not received any compensation. At the time of this study, the Mufulira municipality indicated that they were still considering how to help those displaced from farming land. It is hoped that this case will be addressed by local authorities, together with displacement issues currently happening in other areas in Mokambo area, for instance in Ulasho.

2. Methodology

2.1 Analytical framework for assessing adequacy of resettlement and compensation practices

The purpose was not to conduct a legal compliance audit of the Minambe displacement, but to assess whether the process, as described by stakeholders and affected households, aligned with internationally recognised principles of fairness, transparency, adequacy, participation, livelihood restoration, and access to remedy.

The analysis was guided by relevant Zambian legal and policy frameworks, together with international standards on land acquisition, displacement, compensation, livelihood restoration, stakeholder engagement, and access to remedy. At national level, the study considered constitutional protections on property rights, the Lands Acquisition Act, and Zambia's National Resettlement Policy (2024). These frameworks were used to assess whether the compensation process reflected principles of lawful acquisition, fair compensation, consultation, and protection of affected persons.

At the international level, among various international standards, the study drew on IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement, which outlines standards and good practice regarding consultation, compensation, livelihood restoration, and grievance mechanisms for persons affected by land acquisition and involuntary resettlement. This standard notably emphasises meaningful stakeholder consultation, disclosure of information, compensation at replacement cost, assistance to physically and economically displaced persons, livelihood restoration programme and monitoring, specific protection of vulnerable groups, and accessible grievance mechanisms.

2.2 Study design and methodological approach

This monitoring study, conducted over a week in November 2025 by CEJ staff, was carried out by a team of researchers comprised of 1 man and 3 women. The study adopted a mixed-methods approach, combining quantitative data from household surveys with qualitative data from Focus Group Discussions (FGDs), Key Informant Interviews (KIIs), and direct field observations. A mixed-methods design was selected to enable triangulation of findings and to capture both measurable socio-economic outcomes and lived experiences related to displacement, compensation, and environmental impacts. This method is often suggested in research on mining-related displacement and resettlement because it gives a more complete picture of complicated social processes and power dynamics that cannot be fully understood through numbers alone (Cernea, 2000; World Bank, 2019).

Household survey respondents captured during fieldwork (identities concealed for ethical compliance).

2.3 Study population and definition of "directly impacted households"

The study population comprised households in Minambe Ward of Mokambo that were directly impacted by the Changfa Resources mining project. For the purposes of this study, *directly impacted households* were defined as households that met at least one of the following criteria:

- Lost residential land, housing structures, or agricultural land due to land acquisition for mining or related infrastructure.
- Received monetary compensation from the mining project because of displacement or land acquisition.
- Experienced loss of livelihood activities (e.g. farming, gardening, brickmaking) due to mining-related land take or restricted access.

2.4 Sampling strategy and survey limitations

The initial study design targeted 105 households, based on preliminary lists of affected households in Minambe. However, only 50 households were ultimately surveyed. This reduction reflects field constraints rather than a change in research intent. The households surveyed were all located in Minambe, and all had received compensation at the time of the study. Notably, the majority of respondents were women. The factors that contributed to the reduced sample and to the broader limitations of the survey include:

- **High levels of out-migration**: Following compensation, many affected households relocated to other towns, rural areas, or across the border into the Democratic Republic of Congo (DRC), making them inaccessible at the time of data collection.

- **Household dispersion**: Compensation in cash without physical resettlement resulted in scattered settlement patterns, complicating tracing and follow-up.

- **Daytime absence of adult men**: Many male household heads were absent during the day due to casual labour, cross-border trading, or farming activities, resulting in a higher availability of women respondents at the time of visits.

Given these constraints, purposive and availability-based sampling was employed, focusing on households that could be physically located and that met the criteria for direct impact. While this approach limits statistical representativeness, it is consistent with qualitative-dominant monitoring study in highly mobile, post-displacement contexts.

In addition, the data collected lack detailed information on land ownership, income, and livelihood prior to displacement, which restricts direct comparisons of ownership structure, income changes, and livelihood options before and after displacement. This limitation results from the absence of systematically documented baseline records and the prevalence of informal or customary tenure arrangements among households. However, based on the local context, the study assumes that land ownership was predominantly customary and that livelihoods primarily involved farming and trading activities at the Mokambo border.

2.5 Study themes and focus of data collection

The study focused on key themes considered central to understanding displacement and compensation experiences in Minambe Ward. These themes guided data collection across the household survey, focus group discussions, and key informant interviews in order to capture both household-level experiences and institutional perspectives on the compensation process. The areas of inquiry included:

- Consultation and participation of community members
- Compensation and valuation process
- Community situation after compensation (i.e. land ownership, housing conditions, use of compensation funds, income and livelihood)
- Environmental impacts, particularly dust exposure
- Complaints and available channels for raising concerns

These themes were selected because they reflect the main social, economic, governance, and environmental issues generally associated with displacement and compensation practices in the area. They also provided a basis for examining not only how compensation was determined and used, but also how affected households understood the process, experienced its consequences, and sought to raise concerns where problems arose.

2.5.1 Household survey

Household surveys were administered to 50 directly impacted households using structured questionnaires deployed through the Kobo data collection platform. The survey covered the core themes outlined above and generated quantitative and descriptive data. All households surveyed had received compensation at the time of data collection.

Table 1: Gender distribution of survey respondents

Gender of respondents	*Frequency*	*Percentage (%)*
Male	11	22
Female	39	78
Total	**50**	**100**

As shown in Table 1, females constituted the majority of respondents (78%, n = 39), reflecting the field realities in Minambe Ward discussed in the preceding paragraphs. This respondent profile is relevant to the study because it reflects the perspectives of participants closely involved in day-to-day household and livelihood concerns. The education profile further informs the interpretation of the findings. As shown in Figure 2, most respondents, regardless of gender, had no formal education or only primary education (90% of the total respondents, n = 45), while relatively few had reached secondary level. This indicates that many participants may have had limited capacity to engage with technical or written information concerning compensation valuation, legal rights, and consultation processes. Such constraints likely reduced their ability to fully understand, assess, and challenge the compensation process.

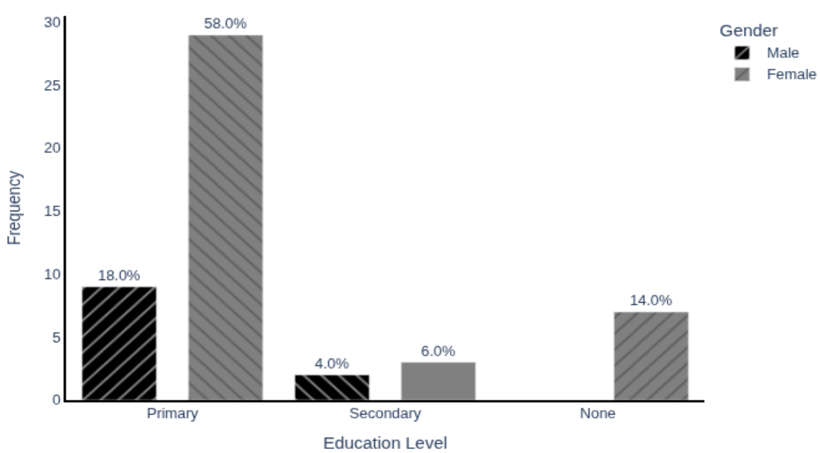

Figure 2: Distribution of respondents by gender and education

The age distribution of respondents in Figure 3 shows that the largest respondent group falls within the 20–29 years category, accounting for 34.0% (n=17). Overall, the survey population is concentrated among younger and middle-aged groups, which is consistent with broader patterns of livelihood participation in peri urban communities.

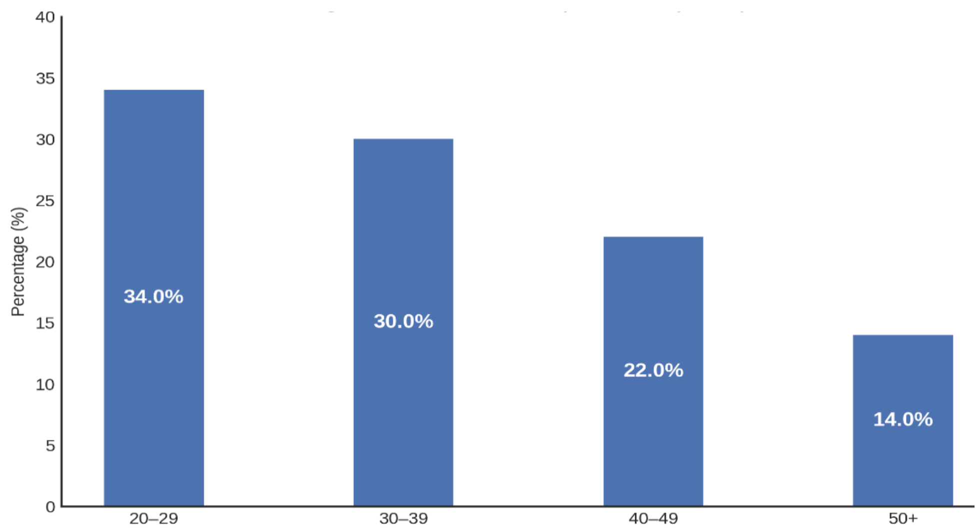

Figure 3:Distribution of respondents by age range

2.5.2 Focus Group Discussions (FGDs)

Three FGDs were conducted in Minambe. The sessions were disaggregated by gender and age to ensure inclusion of perspectives of marginalised groups in displacement processes, comprising adult women, adult men, and youth participants. This disaggregation is consistent with best practice in displacement research, which recognises differentiated impacts across gender and age groups (Cernea, 2000; World Bank, 2019). Unlike the household survey, the FGDs included both affected households that had received compensation and those that had not, allowing the study to capture wider community experiences of exclusion, adequacy, and unresolved impacts.

Each FGD comprised between 8 and 12 participants and explored themes including compensation adequacy, consultation processes, leadership representation, grievance mechanisms, livelihood impacts, environmental concerns, and future expectations.

Community members actively participate in the FGD in Minambe Ward, sharing perspectives on displacement and compensation.

2.5.3 Key Informant Interviews (KIIs)

A total of 14 key informant interviews were conducted with representatives from:

- District-level government departments (Mufulira Municipality, Disaster Management and Mitigation Unit (DMMU), and Agriculture.
- Civil society organizations working on extractives and human rights.
- Community and traditional leadership structures.

Key informants were selected based on their institutional role and involvement in the displacement and compensation process. Attempts were made to speak with company representatives, but Changfa Resources did not grant CEJ an official interview.

2.5.4 Field Observations

Direct field observations were conducted to document housing conditions, settlement patterns, environmental conditions (particularly dust exposure), and infrastructure related to mining activities. Observations complemented survey and qualitative data and helped contextualize reported impacts. These observations were qualitative and descriptive in nature and did not include scientific or laboratory-based environmental sampling or technical measurements.

2.6 Data analysis

Data collected through household surveys was analysed using SPSS and Microsoft Excel to generate descriptive statistics, frequency distributions, and cross-tabulations, providing quantitative insights into compensation adequacy, livelihood changes, and socio-economic impacts. SPSS facilitated rigorous statistical analysis, while Excel supported data cleaning and visualization for clarity in reporting. Qualitative data from FGDs and KIIs were examined using thematic content analysis, enabling identification and cross-checking of recurring patterns, themes, and narratives related to consultation processes, grievance mechanisms, and institutional roles. This dual approach ensured robust triangulation of findings, combining numerical trends with contextual understanding for comprehensive interpretation.

2.7 Ethical Considerations

Ethical standards were upheld throughout the study. Verbal informed consent was obtained from all participants in line with local cultural norms. Respondents were informed of the voluntary nature of participation and their right to withdraw at any stage without consequence. No personal identifiers were recorded, and all data were handled in a confidential and secure manner.

3 Results and Discussion

This section presents the findings from the monitoring study conducted in Minambe Ward of Mokambo, Mufulira district, following the displacement and compensation process linked to mining activities of Changfa Resources.

3.1 Community consultation and participation

Household involvement in the compensation consultation process was limited and primarily informational rather than genuinely participatory. Survey data indicates that 60% of respondents (n = 30; Figure 4) reported that they attended regular meetings while 32% declared they only attended a one-off meeting. Those meetings were primarily organized by the local municipality, as understood from the KIIs, that served as the principal intermediary between the government, the company, and affected households during the compensation and displacement process. Evidence from interviews and focus group discussions suggests that these meetings took place only after key decisions regarding land sale, displacement planning, and compensation arrangements had already been made by government authorities and the company, as a way to communicate the decisions to the community through the local municipality. Consequently, although many households attended the meetings, they were not substantively involved in the decision-making process; instead, they were primarily informed about developments and the type of compensation to be provided. Respondents distinguished between mere attendance at meetings and genuine consultation, defining the latter as an early, iterative and participatory engagement that would have enabled households to express their views and influence decisions prior to implementation.

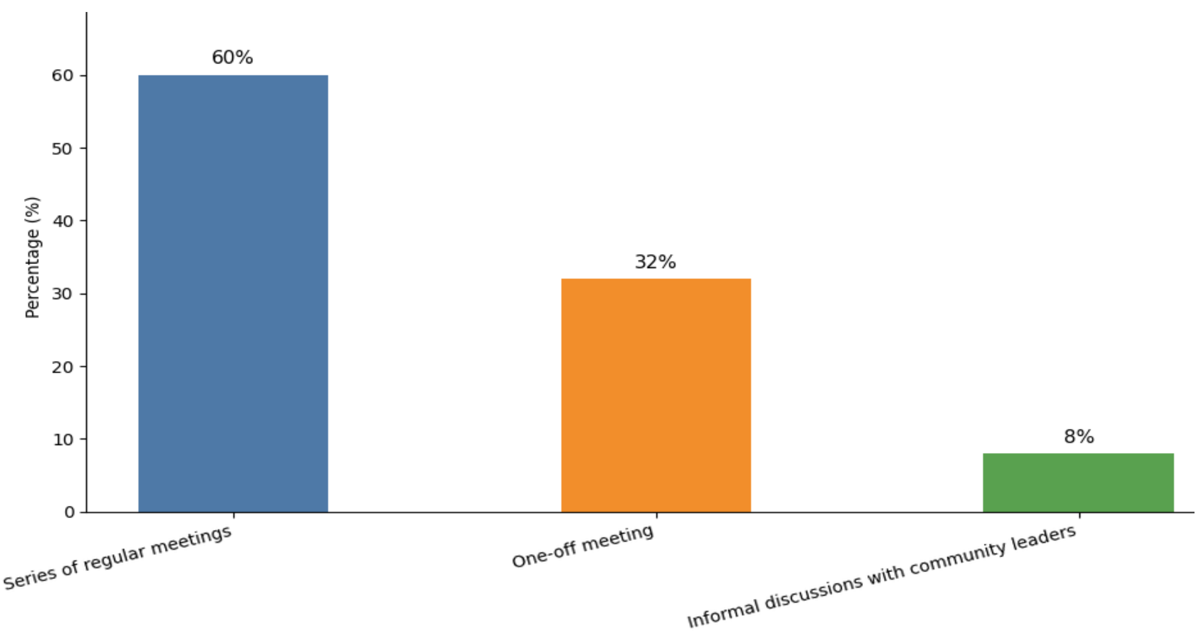

Figure 4: Analysis of household involvement in compensation consultation process

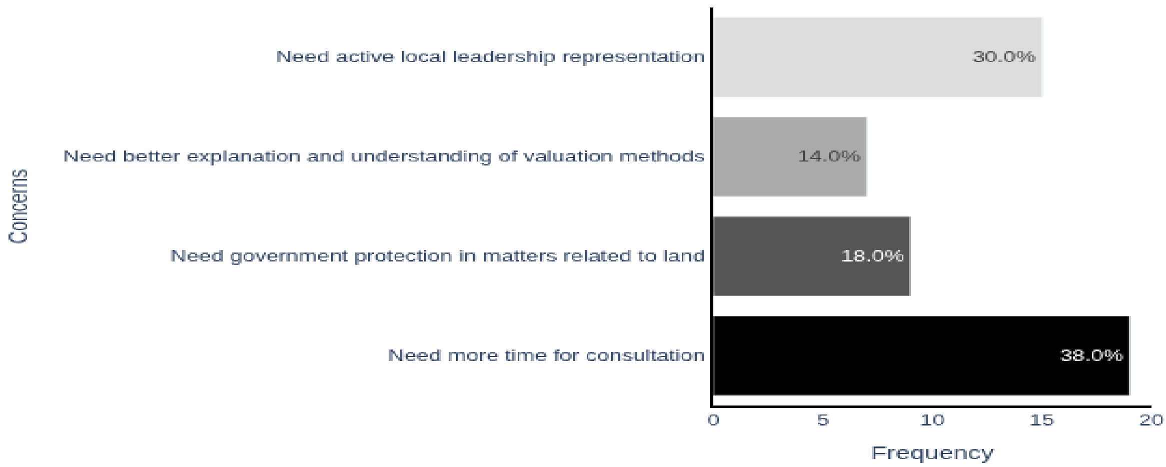

Figure 5:Respondents' views and demands regarding consultation, valuation, leadership, and land protection

Figure 5 highlights some of the respondents' views and concerns regarding the consultation and compensation process. The demand for more consultation time, highlighted as the first concern of the respondents, suggests that communities felt decisions were imposed rather than negotiated, leaving them little room to prepare, exchange and influence outcomes. As one respondent explained, *"They rushed everything; we needed more time to understand and discuss"* (**Annex, Table B1**).

Respondents' call for stronger local leadership representation during the consultation highlight the importance of trusted intermediaries who can articulate community interests and ensure accountability. A participant noted, "*Our leaders should have been there to speak for us, but we were left alone.*" According to information gathered during interviews and focus group discussions, the meetings were convened and led by government representatives through the local Municipality. Respondents consistently reported that company officials were not present during these sessions, and the messages delivered by municipal officials were understood by households as representing both the government and the mining company, since the municipality was perceived to be speaking on behalf of both parties, leaving local leadership structures out of the decision-making process.

Key informants from other government departments expressed similar views, noting that the local municipality effectively served as the main intermediary between the government and the company by channeling information, facilitating communication, leading consultation meetings, verifying eligibility for compensation, and coordinating with the relevant government valuation department in Kitwe and the local municipality in Mufulira (also referred to as Mufulira Town council) on valuation matters. Other district-level departments appear to have played more limited, supportive roles: DMMU collaborated with other offices to support the government-led process, the Agriculture Department contributed mainly on agricultural and livelihood-related matters, and the District Commissioner's office provided overall oversight and guidance across the process. These responses indicate that the compensation and displacement process was largely state-led at district level, with the municipality at the centre of implementation. Despite the fact that this arrangement appeared to be clear on the part of the local authorities, the reported lack of clear communication around it contributed to a sense of ambiguity among displaced households, as they were never certain whether the information provided reflected government policy alone or the company's position as well.

The absence of direct company participation reinforced perceptions that households were excluded from genuine dialogue with all stakeholders, and that their role was limited to receiving information rather than shaping decisions. In addition, the respondents' wish for government protection in land matters points to fears of dispossession and a perception that state institutions prioritise investors over citizens in land- and mining-related issues. This sentiment was captured in the statement of a community member: "*The government protects investors more than us, the citizens.*"

These findings suggest shortcomings in stakeholder engagement when assessed against IFC Performance Standard 5, which emphasises early, meaningful, and ongoing consultation with affected persons throughout the land acquisition and displacement process. Rather than limiting engagement to communicating decisions that had already been made, the standard expects affected communities to have opportunities to participate in decision-making and influence outcomes before implementation. The consultation process in Minambe is therefore not aligned with these expectations.

3.2 Compensation process

The compensation process in Minambe was uneven in both eligibility and compensation packages. The accounts from affected households indicate that, out of more than 500 displaced households, only about 200 reportedly received compensation, mostly those with residential plots, housing structures, or supporting official land documentation. The majority of households received between ZMW 14,200 and ZMW 32,000. Less than five households reportedly received above ZMW 100,000, mainly because they had legal documents for their land.

3.2.1 Respondents' views on compensation decision-makers

As discussed in the section above and based on the results illustrated in Figure 6, respondents' identification of decision-makers in defining compensation packages shows a clear dominance of government officials, with 68.8% (n = 34) citing them as the primary actors.

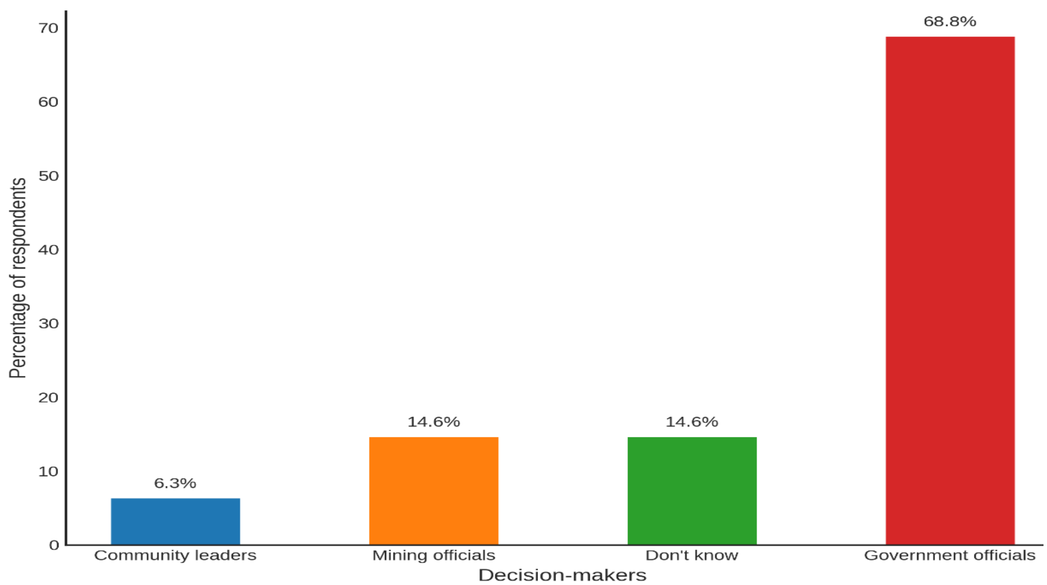

Figure 6:Respondents' perceptions of decision-makers for compensation packages.

Evidence from interviews with the local municipality demonstrates that government agencies, operating through Mufulira Municipality, assumed a central role in coordinating displacement with the mining company, disseminating information about land acquisition to affected individuals, and verifying eligibility for compensation. The municipality said that it relied on formal supporting documents, such as legally issued land allocation or ownership certificates, to substantiate compensation claims to residential plots and farmland. Individuals able to present such documentation were generally recognised as eligible for compensation and, in some instances, received higher compensation packages than those lacking formal proof of land rights. Conversely, households whose land use was agricultural and who lacked formal documentation were frequently not recognised as eligible and were consequently excluded from compensation. Many of these households occupied land under customary tenure arrangements, which were not formally recognised in the compensation process because eligibility was based on statutory land allocation or title deeds.

From a standards perspective, this approach is inadequate as it results in the exclusion of affected households whose land rights or livelihood losses were not formally documented. IFC Performance Standard 5 recognises that project-related land acquisition and restrictions on land use may cause both physical and economic displacement, including loss of assets, access to assets, income sources, or means of livelihood (International Finance Corporation, 2012). It further requires compensation and assistance for affected persons, including those without formal legal title, where project-related land acquisition or restrictions on land use affect their assets, improvements, or livelihoods. In the Zambian context, reliance on formal documentation alone therefore risks leaving customary land users and farming-dependent households without adequate protection.

The mining company's involvement was apparently limited to providing compensation funds, in cash, as determined by the relevant government structures, while the municipality served as the principal intermediary in verifying claims and facilitating payments.

In addition, evidence from focus group discussions and interviews as well as the fact that 14.6% (n=7) of respondents did not know who made compensation decisions, highlight limited transparency and poor communication from decision-makers, both widely recognised risk factors in resettlement and compensation processes (OECD, 2018; World Bank, 2019). When households cannot clearly identify responsible actors, accountability is undermined, and access to remedy becomes more difficult. While government involvement in land acquisition and valuation is expected, research showed that compensation processes dominated by state authorities often lead to procedural exclusion, particularly when consultation is treated as an administrative formality rather than a participatory and ongoing process (Cernea, 2000; World Bank, 2019). The very low proportion of respondents identifying community leaders as decision-makers further underscores weak local representation, which has been linked in research to reduced legitimacy and heightened dissatisfaction. Overall, the results suggest that the compensation process in Minambe Ward was driven primarily by institutional decision-making rather than inclusive, community-centred engagement, reinforcing perceptions of unfairness and exclusion.

3.2.2 Cash payments and household understanding of compensation rate calculation

Households reported that they were offered cash payments only, without the option to choose alternative forms of compensation, which many felt limited their ability to sustain livelihoods. This is significant when assessed against applicable legal and international standards. Under Zambia's Lands Acquisition Act, compensation for compulsory acquisition is mainly framed as monetary compensation for acquired property, assessed largely by reference to open-market value. However, IFC Performance Standard 5 sets a broader standard by requiring compensation at full replacement cost, together with assistance to improve or restore livelihoods and standards of living. It also provides that where livelihoods are land-based, land-based compensation should be offered where feasible. In this regard, the cash-only approach in Minambe was inadequate, particularly for households whose livelihoods depended on farming land.

Households that lost residential plots or housing also reported that they were not provided with replacement land, replacement houses, or planned resettlement sites. Several participants emphasised that, given the choice, they would have preferred land over cash. As one respondent remarked, "*If they had given us land instead of money, we could have continued farming and supporting our families*." Another added, "*Cash finishes quickly, but land stays with you*."

Local municipality officials reported that the government's approach to compensation valuation is primarily based on the property's market value, which is defined as the amount a willing seller might expect to realise in an open market transaction (Republic of Zambia, 1970). They further indicated that the valuation process was undertaken in coordination with the local council and the relevant government valuation department in Kitwe. This suggests that the valuation exercise followed a government-led administrative process and was broadly consistent with Zambia's legal framework for compulsory acquisition (Cap. 189 of the Laws of Zambia), which provides for compensation to be assessed and paid where property is acquired (Republic of Zambia, 1970). However, government involvement does not by itself establish that the compensation was adequate, transparent, or consistent with international resettlement standards. IFC Performance Standard 5 requires compensation at full replacement cost, meaningful consultation with affected persons, and livelihood restoration assistance where land acquisition or restrictions on land use affect communities' assets, access to land, income sources, or means of livelihood. Therefore, while the involvement of the local council and government valuation department may support procedural compliance with national valuation practice, the lack of clear explanation to affected households raises concerns about transparency and adequacy when assessed against international standards.

According to interviews conducted during the study, the valuation process led by the municipality reportedly considered factors such as the replacement cost of structures, the value of standing crops and trees, and improvements made to the land, in addition to market value. Yet, household understanding of compensation rate calculation, as shown in Figure 7, reveals a significant lack of clarity in practice. More than half (51.7%, n = 31) reported that they did not understand the process, while the remainder were unsure about it. Notably, no respondent indicated a clear understanding of how compensation rates were determined. These findings underscore a major gap in transparency, communication, and consultation regarding compensation procedures and valuation methodology. CSOs also echoed these concerns, stressing that communities must be given time and support to understand the valuation process rather than being rushed through. As one representative noted, *"Communities must be given time to understand how compensation is calculated; otherwise, mistrust will continue."*

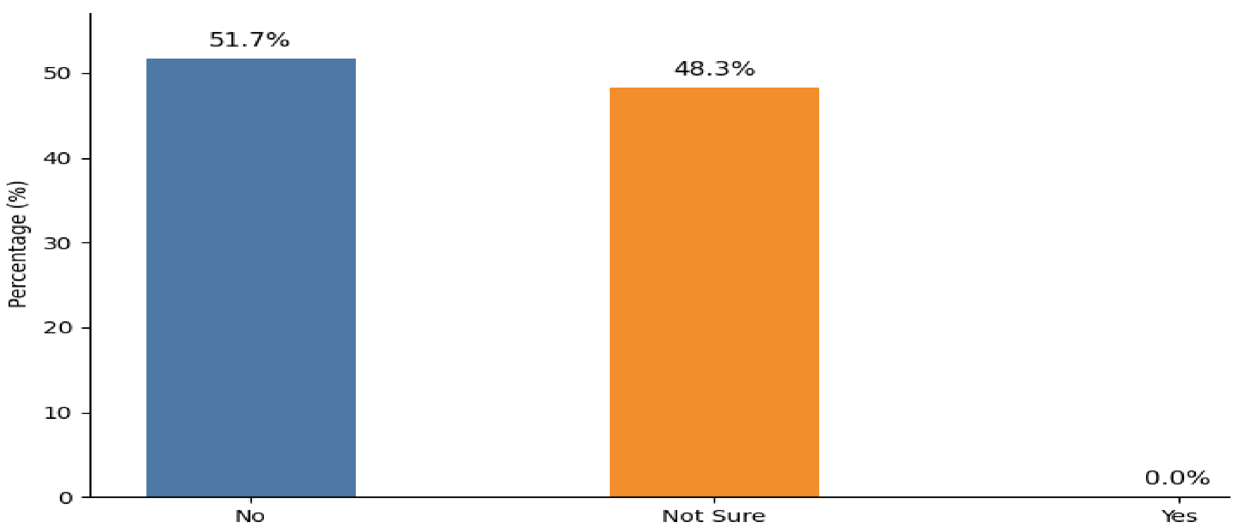

Figure 7:Household understanding of compensation rate calculation analysis

The findings do not necessarily show that no valuation method existed; rather, they show that the valuation approach was not clearly communicated to, or understood by, affected households, which is contrary to IFC Performance Standard 5 practice. This lack of explanation weakened affected households' ability to assess whether the compensation reflected the value of their land, crops, structures, and livelihood losses. It also contributed to perceptions of unfairness and inadequacy, particularly where households received similar amounts despite different losses or where they felt the compensation was too low. As one respondent remarked, "*We don't know how they calculated the money; it was never explained.*" CSOs further emphasised that land *"is not just an asset; but a foundation of livelihoods, identity, and community belonging. Without land, families become vulnerable; they lose their source of food, income, and even social standing" (*Annex, Table B1). The need for clearer valuation methods underscores the lack of transparency, which eroded trust and fueled suspicions of unfairness. One respondent remarked, *"We don't know how they calculated the money; it was never explained."*

Youth voices added another dimension to these concerns, with one young participant stressing, *"We are the future, but if land is taken away without fairness, what will we inherit?"* This highlights the intergenerational impact of displacement and the fear that inadequate compensation undermines the prospects of younger generations.

3.2.3 Households' utilisation of compensation package

Household use of compensation packages shows that the largest share of respondents allocated compensation to farming and livestock (34%, n = 17) and to purchasing or renting land (30%, n = 15), with other uses detailed in Figure 8. Further probing with respondents indicated that, by the time of the survey, most declared that the cash they had received as compensation had already been exhausted. This, however, referred mainly to the liquid cash component rather than to the full value of the compensation package, since some respondents had already converted part of it into assets and livelihood investments such as land, livestock, and inputs for farming activities.

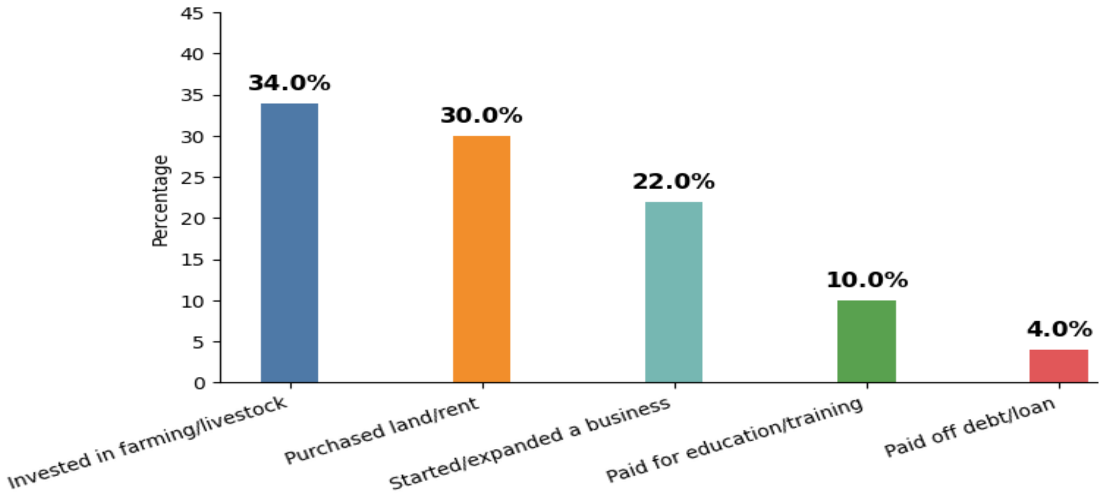

Figure 8:Analysis of Household use of Compensation Packages

Insights from focus group discussions further revealed that households generally viewed compensation as a finite resource that they fully utilised to meet pressing needs. As one participant explained, *"We could not keep the money aside; it was too little, so we had to use it immediately for land and farming inputs."* Another participant emphasised the importance of investing in education, noting, *"Even if the package was small, we thought it better to put something into school fees so our children can benefit in the future (***Annex, Table B1***)."*

These voices indicate that, in a context where there was no livelihood restoration program established by the company in addition to the compensation process, households treated compensation as an opportunity to restore livelihoods and address vulnerabilities, directing funds toward immediate needs such as farming, land, and education. This points to a key gap in the compensation process, as both IFC Performance Standard 5 and Zambia's National Resettlement Policy (2024) emphasize the importance of restoration or improvement of affected persons' livelihoods rather than reliance on one-off cash compensation alone.

3.2.4 Household satisfaction with compensation outcomes

The majority of households expressed dissatisfaction with the compensation process, with 54% (*n* = 27) reporting they were "very unsatisfied." In contrast, only 8% (*n* = 4) indicated satisfaction, and none reported being "very satisfied" (Figure 9). Moreover, information from a CSO indicated that the compensation process also generated tensions within families and the wider community, particularly where compensation amounts were seen as inadequate or where payments were received and used by relatives representing absent family members without their consent. The compensation process therefore created new disputes over representation, control, and use of the funds.

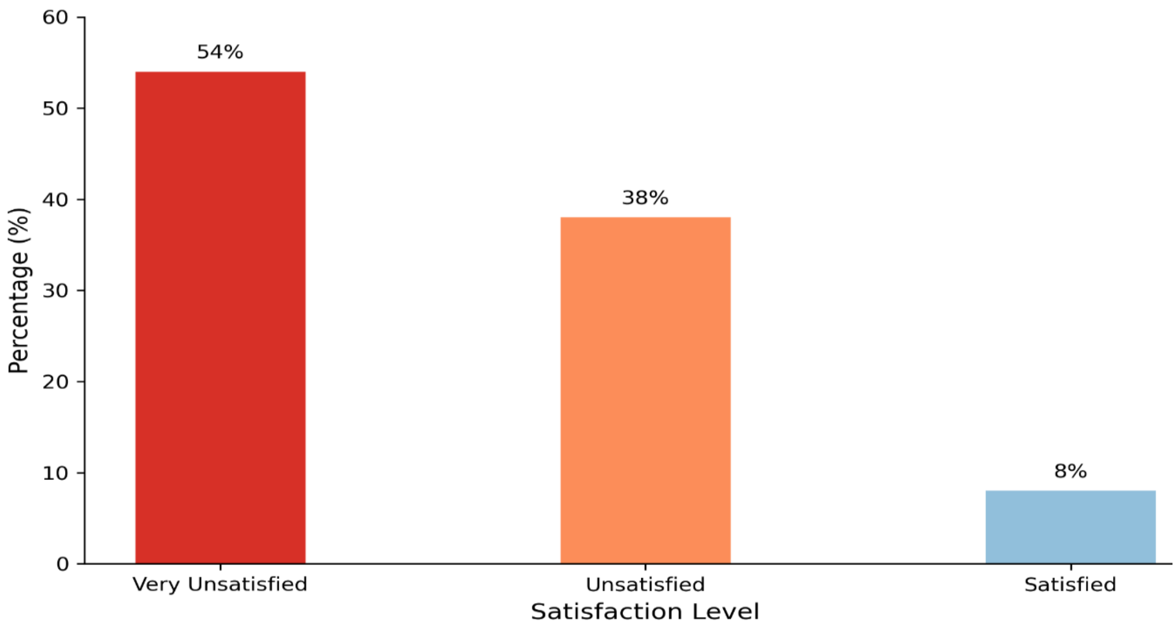

Figure 9:Household levels of satisfaction with compensation process

Insights from focus group discussions further illuminate the reasons behind this dissatisfaction, beyond the inadequacy of the amounts of the compensation packages and the absence of options for land and housing replacement as highlighted above. To summarise, respondents described feeling excluded and uncertain about who the actual decision-makers were, reinforcing a sense of disempowerment. As one participant explained, "*We were never told how they calculated the money, and we don't know who decided it.*" A female respondent further appealed for stronger state protection, noting that "*the mine is very close to our settlement, and we fear the same thing will happen again, displacement without proper compensation or resettlement (***Annex, Table B1)***.*"

Overall, these findings point to shortcomings in the compensation process relating to transparency, meaningful participation, inclusiveness, and access to information. The lack of involvement of affected communities in decision-making and the limited clarity regarding compensation procedures suggest gaps in alignment with the principles of stakeholder engagement and livelihood restoration reflected in IFC Performance Standard 5 and Zambia's National Resettlement Policy (2024). The shortcomings highlight the need for improvements in transparency, fairness, and communication.

3.3. Land and livelihood impacts of displacement

3.3.1. Status of land ownership among respondents

In relation to land ownership among respondents after compensation, 30% (n=15) reported owning land, while the majority, 70% (n=35), do not own land and are currently renting (see Figure A1 in Annex). The landownership should not be interpreted as a simple indication that these households were wealthier or that compensation alone enabled them to acquire land. Follow-up information suggests mixed pathways into land ownership. Some respondents already had access to residential land through inheritance, while others had acquired land earlier when land was still relatively affordable. A smaller number used part of their compensation package, sometimes with additional personal funds, to acquire land elsewhere. This means that post-compensation land ownership reflected a combination of pre-existing family assets, earlier land acquisition, and limited reinvestment of compensation, rather than the compensation package alone. While most respondents were women (who historically face greater challenges in accessing property (Kilic et al., 2020), the survey captured household-level ownership, meaning the reported status reflects collective household arrangements rather than individual women's access to land. Importantly, the land ownership reflected in Figure A1 refers primarily to residential plots or housing units in the current established settlement, not farmland. FDGs participants interviewed further indicated that they no longer own farmland following the displacement process; instead, many households rent farmland across the border in the Democratic Republic of Congo.

The displacement process affected included both landholders and renters. Most landholders had accessed land through customary tenure arrangements, under which they could rent land to others or subdivide and sell plots to prospective builders. However, despite long-term occupation and use, most households lacked formal legal documentation to prove ownership, and their claims were not recognised by the local authority, Mufulira Municipality. The renters were not recognised as eligible for compensation either, despite their long-term use of the land. This is contrary to IFC

Performance Standard 5, which recognises affected persons without formal legal rights to land and calls for compensation and livelihood assistance for those experiencing economic displacement. It also underscores the insecurity of customary land tenure and use in areas where mineral extraction is expanding, as in Minambe.

Many households that previously owned farmland now find themselves renting. This shift is linked to inadequate compensation relative to land values, limited availability of land for purchase, the absence of replacement land arranged by the municipality, and competing household priorities. This finding is derived from both the questionnaire survey and the FGDs where respondents reported that the compensation received was insufficient to secure new farmland and that household immediate needs often diverted resources away from land acquisition.

3.3.2. Household income and effects of displacement and cash compensation on livelihood

Figure 10 shows the main sources of income of households surveyed, after the 2025 compensation process. Farming emerges as the leading source, reported by 52% (n=26) of respondents, followed by business activities at 22% (n=11).

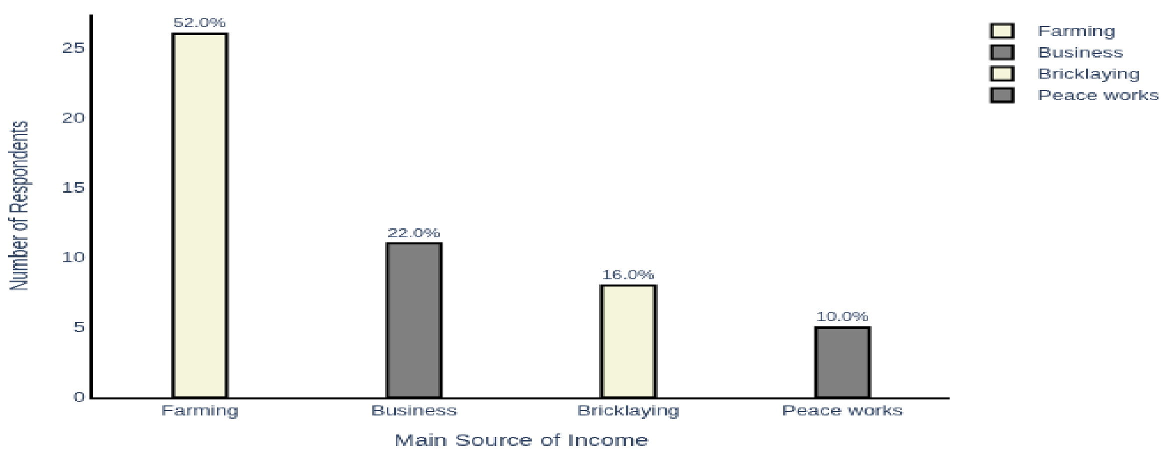

Figure 10:Main Sources of income among respondents after compensation

Farming is largely subsistence, with households growing maize, cassava, and sweet potatoes for family consumption and limited sale. Business activities include selling farm produce, reared chickens, soft drinks, and other small items at the Mokambo border. Bricklaying involves constructing houses and shops within Mokambo and Mufulira town, while peace workstypically consists of assisting in agricultural fields, transporting goods, or cleaning household surroundings for cash. Qualitative evidence from FGDs and household interviews indicates that many respondents relied on subsistence farming and small informal businesses before displacement. As one female respondent in an FGD explained, *"Before we were moved, I survived by growing maize and selling vegetables at the local market" (***Annex, Table B2)***."* Following compensation, some households used the money to recapitalise existing businesses or start new ventures, reinforcing the role of farming and small trade as dominant sources of income, with other activities providing supplementary livelihoods.

Figure 11 shows that, at the time of data collection, most households fell within the lower income categories after displacement and compensation. Specifically, 64% of respondents (n = 32) reported a monthly income below K2,000, equivalent to approximately USD 83 at the November 2025 exchange rate. Since the study did not collect comparable pre-compensation income data, these results should not be interpreted as evidence of a change in income attributable to compensation. Rather, they provide an indication of the post-compensation economic circumstances of affected households and help contextualise their continued livelihood vulnerability.

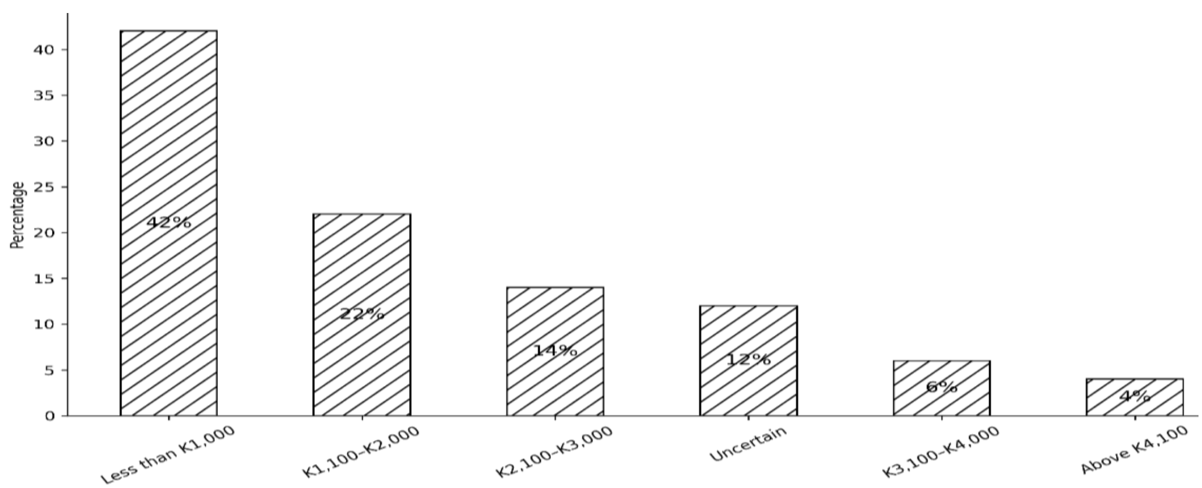

Figure 11:Analysis of estimated monthly household income after compensation

The effect of displacement and the use of cash compensation on household income and livelihoods is illustrated in Figure 12. Half of the respondents (50%, n =25) reported decreased income or a loss of livelihood opportunities, primarily due to the loss of land that had supported farming as their major source of livelihoods.

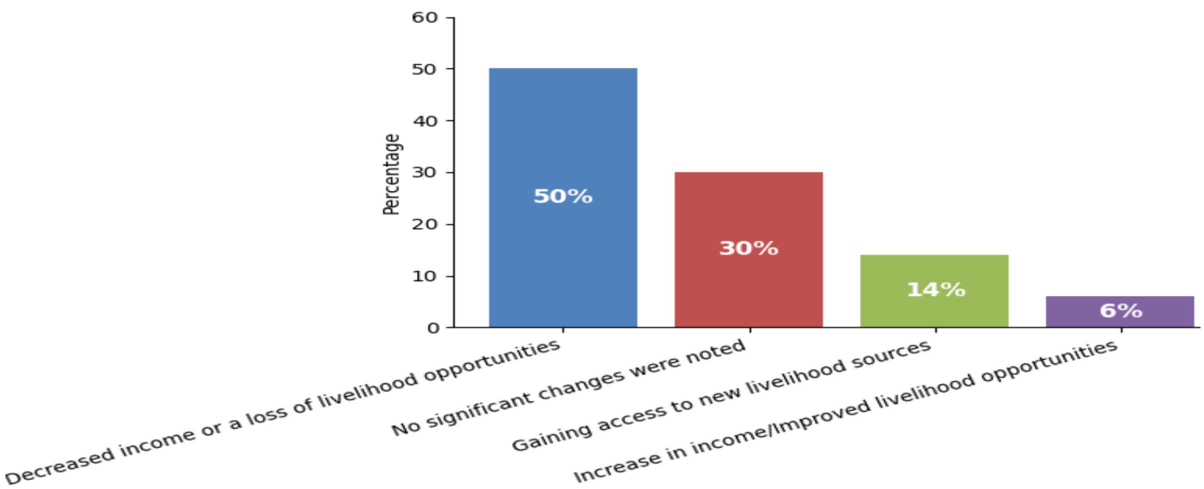

Figure 12:Effect of Compensation on Households income and livelihoods

These findings suggest that displacement and the use of cash compensation had largely different impacts across households, leaving at least half of the respondents worse off in terms of income stability and livelihood opportunities, while a smaller share benefited (20%) or remained unaffected (30%). This variation underscores the uneven consequences of cash compensation processes, where the loss of productive land undermined agricultural-based livelihoods for many, even as others were able to adapt or diversify into new sources of income, such as charcoal production and selling secondhand clothes.

The implications of these results are significant. First, they highlight that cash compensation alone does not guarantee livelihood restoration, especially when households are heavily dependent on farming and land-based activities. Without access to productive land and adequate support through livelihood restoration programs, households face long-term vulnerability, reduced food security, and diminished income-generating capacity. Second, the smaller proportion of households that reported improved or diversified livelihoods suggests that compensation may create opportunities for adaptation. In interpreting this pattern, the study argues that such opportunities are more likely to benefit households that already have the resources, skills, or social networks necessary to make effective use of compensation. Third, the uneven outcomes point to structural inequalities in how compensation is defined, accessed and utilised, raising questions about the adequacy and valuation of the compensation packages and the support systems available to displaced households.

Overall, the evidence indicates that while compensation provided some households with opportunities to rebuild or diversify, for the majority, it failed to remedy the economic and livelihood losses tied to displacement. This underscores the need for compensation programmes to go beyond cash payments and include measures that strengthen livelihood resilience, such as access to land, agricultural inputs, training, or alternative employment opportunities, through a dedicated livelihood restoration programme. This is also consistent with IFC Performance Standard 5, which requires that the livelihoods and standards of living of economically displaced persons be improved or, at a minimum, restored following land acquisition or restrictions on land use (International Finance Corporation, 2012b).

3.4. Remedy avenues

Access to remedy is a key requirement in displacement and compensation processes because affected households need a clear way to raise concerns, challenge decisions, and seek correction where consultation, valuation, compensation, or livelihood restoration is disputed. This is consistent with IFC Performance Standard 5, which expects projects affecting communities to establish accessible grievance mechanisms to receive and facilitate resolution of affected people's concerns as early as possible in the process (International Finance Corporation, 2012a; International Finance Corporation, 2012b).

Respondents consistently emphasised in the FGDs that formal grievance redress mechanisms were either absent or unknown to them, pointing to significant gaps in transparency and accountability. Many participants stated that they were not aware of any established channel through which grievances could be formally reported or addressed, either by the company or through the municipality. As one participant remarked, "*We did not know where to take our complaints; there was no office or person to listen to us.*" This lack of clarity on how to raise complaints extended across all stages of the process, including consultation, displacement, valuation, and compensation package determination, leaving affected households without a reliable formal avenue to voice concerns and get remediation. As another FGD respondent explained, "*Even when the land was valued, we had no chance to question or appeal; everything was decided for us*." Information from a CSO confirmed that no formal grievance redress mechanism was in place and that community members could only go to the municipality offices to raise concerns informally. However, this process appears to have been an ad hoc option rather than a clear, accessible, and structured grievance mechanism. Consequently, most grievances were raised verbally and remained undocumented, and it appears that they were not effectively communicated to the responsible authorities or the company, contributing to widespread dissatisfaction and a sense of exclusion. More importantly, the absence of a formal, accessible and transparent grievance mechanism limited communities' ability to seek remedy and reinforce their vulnerability. FGD participants further noted that this contributed to feelings of neglect and mistrust, with one group stressing, "*We were left in the dark, and our problems remained with us only*." This situation not only undermined confidence in the process but also reinforced perceptions of unfairness and impunity, as communities felt that their voices were overlooked. Respondents therefore stressed that meaningful participation requires accessible, transparent, and effective grievance redress systems.

3.5. Dust exposure and environmental impacts

As illustrated in Figure 13, 74% (n =37) of respondents raised that they experience dust occasionally, and 20% (n =10) several times a week. Most dust was attributed by the respondents not directly to operations at the mine site but to vehicles associated with mine construction activities passing through the community. This underscores the significant impact of ongoing-mine construction activities on household environments and daily living conditions. The respondents also highlighted that the mining infrastructures are located dangerously close to community spaces, including for instance a church, situated only five meters from the mine boundary, suggesting risks in continued dust emissions after the construction is finalised.

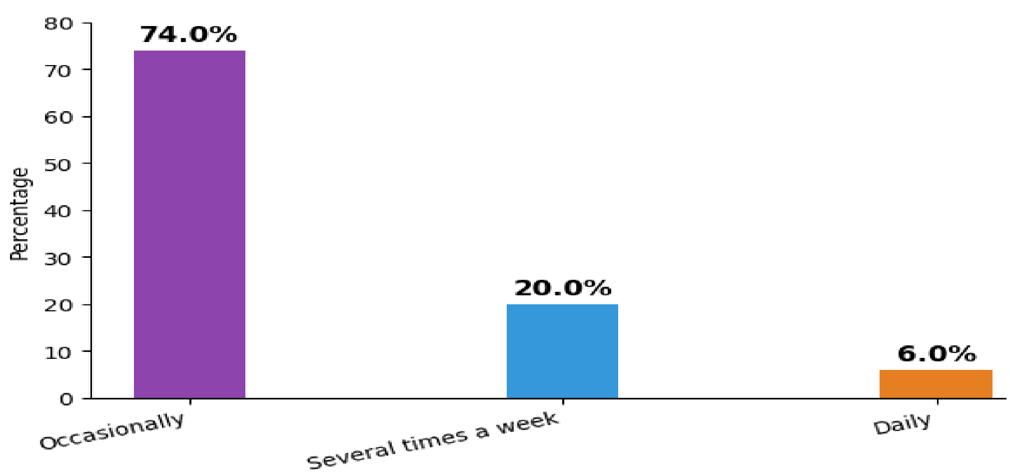

Figure 13: How often do households experience mining-related dust?

Beyond household discomfort, respondents expressed heightened concern for vulnerable groups, particularly children and women who draw water at the borehole situated directly along the busy road. The borehole, a vital source of clean water, has become a site of exposure where clouds of dust settle on containers, clothing, and even the water itself. Women reported that children often cough or rub their eyes while waiting for water as trucks speed past, raising fears of short- and long-term respiratory problems.

One male participant in the FGDs vividly demonstrated the situation as vehicles passed during the discussion: "*Look at this, every time a truck goes by, the dust rises like smoke. Our wives and children are here at the borehole, breathing this in. Even the water we collect is not safe anymore*." **(Annex, Table B2)**. Another respondent added: "*We worry most for the little ones. They cannot protect themselves, and yet they are here every day with their mothers.*"

These testimonies indicate that dust exposure may be more than an environmental nuisance and could have implications for community health and wellbeing, particularly for women and children who regularly travel to access water. However, as the study did not include scientific air-quality testing or health assessments, these reported concerns should be treated as community-level evidence that warrants further environmental and health investigation.

3.6. Specific concerns of women and youth in the compensation process

The comparative FGD results show that women and youth experienced the compensation process in distinct but overlapping ways. Female respondents' concerns centred on the immediate effects of displacement on household survival, particularly the insufficiency of compensation to buy land or rebuild homes, the loss of farming land and related food insecurity, and the sense that vulnerable groups were overlooked in eligibility and valuation decisions. One female respondent stated that "*Without land, it is difficult to feed the family because farming is what we depended on. The money was not enough to buy another piece of land or rebuild properly.*" Women also linked the process to environmental health risks, especially dust exposure affecting women and children in their daily activities.

Youth perspectives in the FDG, by contrast, highlighted exclusion from leadership and decision-making spaces, lack of transparency in eligibility and compensation package determination, and frustration that displacement was not accompanied by employment or livelihood opportunities. As one youth participant explained, *"We were not involved in the decisions, and after the land was taken, there were no jobs or skills training for us. We now depend more on our parents, yet we are the ones who need a future."* Youth participants associated the process with joblessness, increased dependency on parents, and concerns about their future prospects, while also stressing the need for skills training and work opportunities.

Generally, these findings suggest that the compensation process had differentiated impacts across social groups, with women bearing heavier household and food security burdens, and youth experiencing exclusion, unemployment, and uncertainty about future livelihoods.

4. Conclusion

This study of displacement and compensation practices in Minambe Ward of Mokambo, Mufulira District, shows that the process was largely state-led, cash-based, and insufficiently responsive to the living conditions and livelihood realities of affected households. Although compensation was provided, the process was characterised by limited meaningful consultation, weak transparency in valuation, poor household understanding of how compensation rates were determined and inequitable compensation packages, the exclusion of many economically displaced households from the compensation process, particularly renters and farmland users who lacked formal documentation, despite losing access to land or livelihood sources. For many households, especially those dependent on farming and land-based livelihoods, cash compensation did not restore or improve pre-displacement living conditions or livelihood security. Instead, the process contributed to land scarcity, reduced income-generating capacity, food insecurity, and heightened vulnerability. At the same time, environmental concerns, including dust exposure, unsafe water conditions, and the proximity of mining activities to community spaces, point to broader and continuing human rights impacts associated with the displacement process, including risks to the rights to an adequate standard of living, water, land, and property. These findings indicate that the resettlement process in Minambe was neither complying with national and international standards on involuntary displacement, such as Zambia's National Resettlement Policy (2024) and IFC Performance Standard 5, nor aiming to restore or improve the living conditions of the communities.

The findings further highlight important governance and institutional challenges in the management of mining-induced displacement in Zambia. The central role played by government structures, particularly the local municipality, suggests that the State was not only an intermediary but also a key actor in organising, guiding, and implementing the process, in collaboration with the company. At the same time, the findings point to broader institutional weaknesses, including the absence of a binding resettlement framework aligned with international standards, which has contributed to inadequate compensation practices and limited livelihood restoration. In this regard, government and company responsibility for displacement-related impacts does not end with the payment of compensation. Evidence from the study indicates that some impacts remain unresolved in Minambe Ward, which should urgently be addressed by the government and the company, especially as compensations processes of other affected communities are currently taking place in surrounding areas, for instance in Ulasho in Mokambo. This shows that the Minambe case is not an isolate, closed episode, but is part of wider and continuing displacement processes as mining operations continue to grow in Zambia. Governmental authorities and mining companies still have an opportunity, and responsibility, to address the gaps identified in this study based on international standards and through a human rights-based approach. This includes improving consultation, strengthening transparency and accountability, ensuring fair and understandable eligibility and valuation processes, providing effective grievance redress, and supporting livelihood restoration. The lessons from Minambe are therefore relevant not only to this community, but also to ongoing and future displacement processes in Mokambo and other mining-affected areas in Zambia, where a fairer, rights-compatible, and more participatory approach remains urgently needed.

Recommendations

Based on the evidence presented and the perspectives of displaced communities, the following actionable recommendations are advanced to strengthen governance, accountability, and social justice in mining-induced displacement.

1. The Government of the Republic of Zambia:

- should enact a binding national resettlement law that establishes legislation aligned with international standards, including avoiding or minimising displacement as well as ensuring meaningful consultation and engagement, clarity on setting of compensation rates, adequate livelihood restoration, and available and effective grievance mechanisms, to ensure consistency and fairness across resettlement and compensation practices for all mining projects in Zambia.
- should include clear and enforceable provisions on early, meaningful, and non-coercive consultation of mining-affected communities in the Cabinet-approved Resettlement Management Bill, 2026, and related mining and environmental impact assessment regulations. Consultation should occur before decisions on land acquisition, displacement, and compensation are finalised and be conducted throughout the project cycle to take into account community voices and concerns in decision-making. It should be based on adequate and accessible information and be inclusive of women, youth, and other vulnerable groups.
- should require that compensation packages of mining companies for displaced households include livelihood restoration measures in addition to cash compensation where livelihood assets and activities are affected. These measures may include land-for-land options, restoration or replacement of affected assets, agricultural support, vocational training, and improved access to markets to support the rebuilding of sustainable livelihoods.
- should empower its district and provincial authorities with adequate financial, technical, and human resources to strengthen monitoring and enforcement of mining-related resettlement, compensation, and environmental obligations. This should include oversight of consultation processes, eligibility verification, valuation procedures, compensation payments, livelihood restoration measures, grievance redress mechanisms, environmental management plans, and compliance with

licence or permit conditions. Such oversight would enable authorities to detect non-compliance early, require corrective action, and hold mining companies accountable where displacement, compensation, or environmental safeguards are not properly implemented.

2. Mining companies:

- should take responsibility for designing and implementing resettlement and compensation processes in line with international standards, including IFC Performance Standard 5, even where national legislation is not yet sufficiently detailed or enforceable. In collaboration with relevant government authorities, companies should ensure that resettlement action plans, valuation methods, eligibility criteria, compensation rates, livelihood restoration measures, consultation records, and grievance mechanisms are developed through a participatory process, publicly disclosed, and clearly explained to affected households before displacement takes place. This responsibility should not be limited to providing funds for compensation; it should include ensuring that affected communities are meaningfully consulted, that compensation is provided at replacement value, that land-based and other livelihoods are restored where possible, and that vulnerable groups are not excluded. Upholding these higher standards would strengthen accountability, reduce conflict, and help companies secure a genuine social license to operate based on trust, transparency, and respect for affected communities.
- should establish, in coordination with local authorities, operational-level grievance mechanisms in accordance with the effectiveness criteria that are established in the United Nations Guiding Principles on Business and Human Rights, thereby ensuring that mining-affected communities have access to effective, gender and age sensitive and culturally appropriate channels for complaints and dispute resolution, with independent oversight to guarantee fairness and trust in the process.

3. Investors and financial institutions

- should require mining projects they finance to conduct impact assessments, management plans, and resettlement planning that respect human rights and meet at least applicable international standards. These standards represent the minimum requirement and must be supported by ongoing monitoring, disclosure, and corrective action when deficiencies are found.

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Annex A

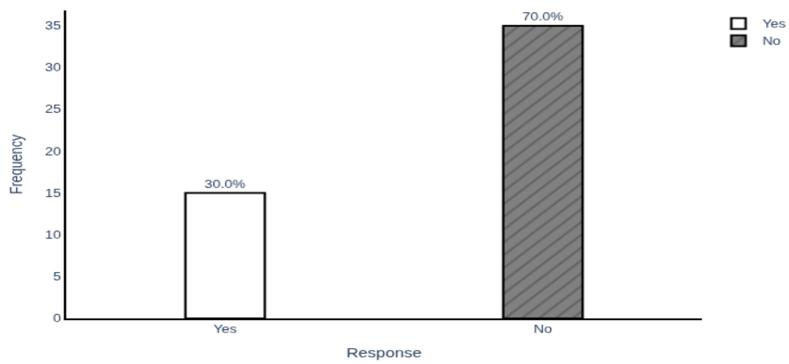

Figure A1: Land Ownership after compensation among respondents affected by mining in Minambe Ward

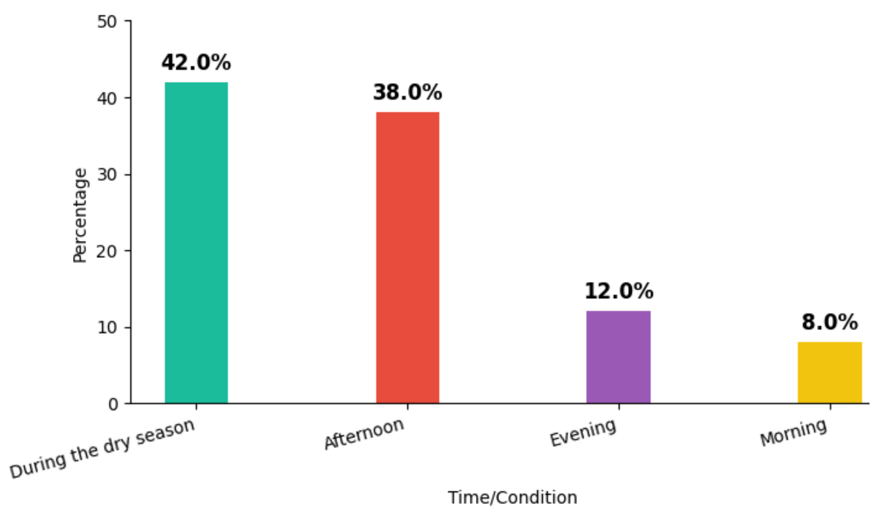

Figure A2: Respondents' experiences of dust exposure and related time/condition

Note: *This figure presents respondents' reported experiences of dust exposure during the dry season only, as the study did not collect comparable data for the rainy season. This limitation should be considered when interpreting seasonal patterns of exposure.*

Annex B

Table B1: Key Informant Responses: Civil Society Organisations

Theme	CSO 1	CSO 2
Organisation's view on community consultation	Affected community was not fully consulted; process pre-determined by government office	Community was not fully consulted; directives given without options
Who carried out valuation and determined packages	Government working with valuation department in Kitwe and the council	Government, the mine, and the council; CSOs were left out
Complaints raised towards valuation	Several complaints; only those with legal documents were properly compensated	Almost everyone complained; communities did not understand valuation criteria; most received same amount
Compensation adequacy	Compensation package was small; expressed concerns, reinforced by local rumors, that compensation packages were subject to hidden deductions.	Money was little and cannot sustain households even for a year
Community involvement in compensation discussion	Displacement came as a shock; minimal engagement except unclear valuation meetings	No involvement; only directives given to the community
Who spoke on behalf of the community	Not clear who spoke; even if they did, they were not heard as process was pre-arranged	Not sure; municipality played major role
Transparency of the process	No transparency; CSOs excluded and provided no input	No transparency; communities do not understand what happened to their land
Specific interventions by organisations	Tried to intervene to some extent; no specific interventions to point at	Did some community sensitization but engagement was limited due to capacity
Presence of grievance mechanism	No grievance mechanism; company representatives absent	No formal grievance redress mechanism was made available; communities could only go to municipality offices.

Grievances raised by the community	Complaints around land grabbing, lack of consultation, inadequate compensation package	Lack of alternative land, lack of understanding of valuation, lack of grievance mechanism; farm owners without legal documents not compensated
Inter-community or family tensions resulting from the process	Tensions were obvious due to inadequate compensation and use of same small amounts by families	Some family members were far away and could have been represented by others; money could have been received by someone else
Improvements suggested by CSOs	Government should put the interest of local people first, secure land for resettlement for affected communities, and conduct community sensitization for effective participation	Community involvement at inception is key, ensure adequate compensation, strengthen legal framework on compensation and resettlement, and conduct Free Prior Informed Consent

Table B2: Comparative FGD results Table

Theme	FGD 1 (Women)	FGD 2 (Men)	FGD 3 (Youth)
Compensation Adequacy	Packages too low to buy land or rebuild homes	Felt compensation unfair and inconsistent	Frustrated over lack of job opportunities
Consultation Process	Minimal engagement; meetings mostly informative	No involvement in decision-making	No consultation; only informed after decisions
Grievance Mechanism	No clear channel to raise complaints	Mechanisms absent; fear of victimization	No grievance system; felt powerless
Leadership & Representation	Weak local leadership; the headman was not recognized and not consulted properly.	Councilors absent during key decisions.	Youth excluded from leadership discussions.
Package Determination	Unclear valuation; no explanation given.	Perceived government and company collusion.	No transparency; rumors about favoritism.
Eligibility & Valuation	Criteria unclear; vulnerable groups overlooked	Suspected favoritism in eligibility	Youth felt excluded from eligibility considerations
Impacts on Livelihoods & Social Life	Loss of farming land; food insecurity	Reduced income; social tensions in community	Joblessness; increased dependency on parents.
Future Expectations & Recommendations	Desire for fair compensation and livelihood support	Call for transparency and local leadership inclusion	Need for skills training and employment opportunities
Perceptions of Fairness	Felt process was rushed and biased	Compensation seen as benefiting a few elites	Viewed process as corrupt and discriminatory
Human Rights Concerns	Right to shelter violated; fear of homelessness	Right to food and livelihood undermined	Right to safe environment and work opportunities
Dust Exposure	Increased dust during dry season; health concerns	Dust from trucks affecting crops and water sources	Dust exposure frequent; linked to unsafe environment

Table B3: Key Informant Responses: Government representatives at district level

Theme / Question	Municipality	DMMU	Agriculture
Role in Mokambo displacement & compensation	Facilitated compensation on behalf of the government; negotiated for community; provided backup documents	Collaborated with other departments to support govt initiative	Limited role; supported departments actively working with communities
Were communities adequately consulted?	Yes, through several meetings	Municipality officials engaged communities on behalf of government.	Aware of consultations through meetings with municipality officials.
Criteria for eligibility	Everyone with a residential plot was eligible, even without documents	All affected individuals were eligible and compensated	Households eligible; farms required legal documents; residential plots eligible
Valuation methods applied	Govt-approved valuation methods; Kitwe valuation department involved	Approved govt methods applied	Council worked with government valuation department
Communication of cut-off dates	No cut-off dates; ensured ample time for all affected	Not much known; enough time was given	Municipality spearheaded; details not clear
Complaints on eligibility, valuation, cut-off dates	Complaints mainly on valuation; people wanted more money	Complaints expected; money never enough	Complaints common on valuation; people unaware of process
Engagement with Changfa	Effectively engaged Changfa; issues resolved including compensation	Changfa engaged by govt; cooperated fully	Changfa collaborative; smooth process with municipality officers
Role of District Commissioner	Oversaw entire process; monitored and guided municipality administration and community	Provided support to all offices from onset	Ensured careful handling between company and communities
Govt responsibility for unresolved impacts	Still working to compensate other affected communities; addressing complaints	Ongoing support; plans for boreholes and development	Ensuring conclusion of process; company starts operating to benefit community
Support to displaced & vulnerable	Ensured compensation; provided cash-for-work opportunities	Provided boreholes and food-for-work programs	Farmer input support program: seeds and fertiliser

Adequacy of compensation packages	Yes; residential plots were illegal and compensation exceeded acquisition cost	Yes; govt-mandated valuation applied	Yes; standard procedures followed
Grievance redress mechanism	Not formalised; municipality officials resolved grievances and informed relevant offices[1]	Possibly through meetings with municipality officials	Not sure; municipality officials were actively involved
Grievances raised so far	Complaints on inadequate packages and exclusion of some farmers	Small packages; unclear calculations	Complaints on small packages (cash only).
Socio-economic impacts reported	Land shortage affecting livelihoods; dependency on agriculture	Land scarcity impacting income and food security	Lack of land for farming; major concern for future.

[1] CEJ found that no formal grievance redress mechanism was established during the compensation and displacement process. As explained in interviews and FGDs, affected households raised complaints informally by approaching officials at the local municipality (whom they interacted with throughout the process) since these officials were the most visible representatives managing the process. Complaints were therefore received verbally and handled on an ad hoc basis, without systematic documentation and resolution, nor communication to higher offices.