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Strategic Environmental Assessment Mining Case

Good practice for Mozambique

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1.0 Introduction

Strategic environmental assessment (SEA) is an approach for assessing the impacts of proposed policies, plans, and programs. It can enhance the mining sector's contribution to sustainable development, and it can help mining countries to avoid or reduce negative social and environmental consequences.

This publication explains how an SEA for mining can be successfully carried out in practice. It presents the SEA for the Zambezi Valley in Mozambique, where mining plays an important role in the economy. The Zambezi Valley SEA created a policy dialogue with different stakeholders and brought environmental and social aspects into the region's planning process.

The report aims to encourage mining actors to carry out SEAs in relation to their own policies, plans, and programs. Specific goals of this report are to

- show how an SEA for mining can be developed in practice
- present how an SEA can be included in decision making about plans that are key to mining
- present key elements of a good-quality SEA.

The SEA for the Zambezi Valley was one of the five cases included in the report *Strategic Environmental Assessment for the Mining Sector: Lessons From Country Case Studies* (Borrelli et al., 2024). While that report showed the potential benefits of an SEA for the mining sector, the current report gives more insights into how to carry one out. It is a strong example of how an SEA can be integrated into the decision-making process.

After setting the scene, the report describes the SEA process and content, followed by an overview of the results and a summary of

challenges and success factors. The report ends with a brief conclusion.

2.0 Background: Need for coordinated development in the Zambezi Valley

The Zambezi Valley lies in the centre of Mozambique (see Figure 1).¹ It forms 20% of the national territory and has about 5 million inhabitants. The Zambezi Valley area is extremely rich in natural resources and biodiversity and has a variety of habitats. It has abundant mineral resources (including coal), fertile soils, good potential for irrigated agriculture and opportunities for hydropower development. Developing the agricultural and mining sectors aimed to convert the Zambezi Valley into Mozambique's second socio-economic development pole. This resulted in increased pressure on land and water and posed major challenges (TPF, 2014b).

FIGURE 1. Geographical study area



Source: TPF, 2014b.

¹ The study area includes all districts of Tete Province and neighbouring districts of the Zambezi Valley.

TABLE 1. Geographical study area

Province	District	Area (km²)	Total (km²)	147,900 km²
Tete	Angónia	3,529	98,529	
	Cahora-Bassa	8,841		
	Changara	6,622		
	Chifunde	9,412		
	Chiuta	7,199		
	Cidade do Tete	287		
	Macanga	7,208		
	Magoé	8,585		
	Marávia	16,694		
	Moatize	8,430		
	Mutarara	6,384		
	Tsangano	3,670		
	Zumbo	12,018		
Manica	Guro	6,936	1,123	
	Tambara	4,287		
Sofala	Chemba	3,982	13,351	
	Caia	3,592		
	Marromeu	5,777		
Zambézia	Chinde	4,272	24,781	
	Mopeia	7,678		
	Morrumbala	12,831		

Source: TPF, 2014b.

Key critical issues related to mining included the occupation of important areas by coal megaprojects, increased pressure on energy and water resources, and informal small-scale and artisanal mining (see Box 1). Significant conflicts between the mining sector (mainly coal and gold mines) and other sectors (agriculture, conservation,

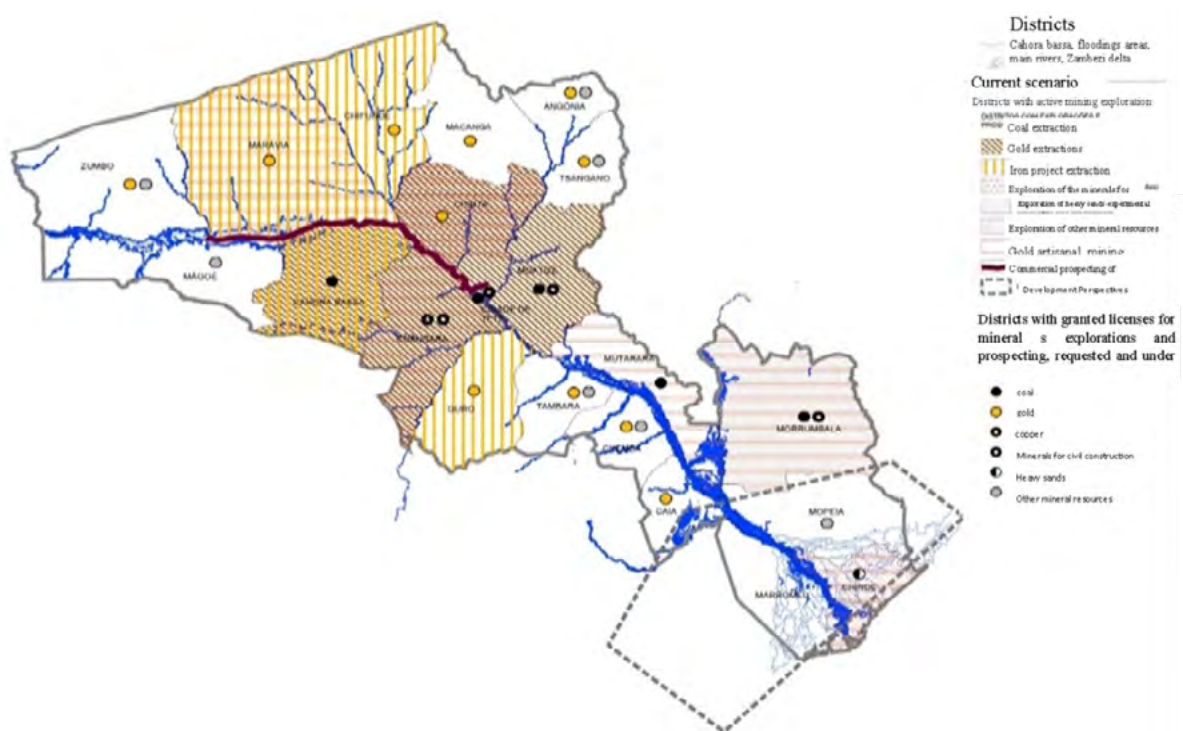
tourism) emerged, as well as conflicts between investors (mining companies) and land-owning communities (Human Rights Watch, 2013).

BOX 1. CRITICAL ISSUES IN THE MINING SECTOR

- Prioritization of coal megaprojects over other uses of land and resources, affecting the development of other activities, such as agriculture, livestock, forestry, and tourism.
- Intensification of mining activities (mainly coal), leading to the destruction of large areas of natural habitats.
- The installation of extractive industry megaprojects forcing local populations to find new places to live, resulting in land-related conflicts.
- Increased energy consumption and pressure on surface and underground water resources, leading to changes in river environments and riparian zones, both quantitatively and qualitatively.
- Existing infrastructures (electricity, transport, export facilities) lack capacity for the disposal of coal, resulting in the accumulation of thermal coal piles.
- Management of waste and by-products resulting from the coal megaprojects.
- Informal small-scale and artisanal mining, reflecting poverty of local communities and lack of alternatives.
- Use of mercury in artisanal and small-scale gold mining, causing problems of water contamination with direct impact on human health, repercussions for water supply (human, animal and irrigation), and leading to the destruction of riparian habitats.

Source: I2A Consultoria e serviços, 2023; TPF, 2014b, 2014c, 2015.

FIGURE 2. Situation/scenario of the mining exploration in the study area, at the time the document/SEA was elaborated



Source: TPF, 2014b.

Most of the mining licences are granted for the exploration of coal, gold, and copper. To a lesser extent, there are licences for heavy sands and minerals for the construction industry (TPF, 2014b, 2014c). The region includes districts with active mineral exploration and with prospecting licences granted, applied for, and under consideration (see Figure 2).

3.0 The SEA Process

Request for an SEA

In 2011, the Ministry of Economy and Finance, in response to emerging conflicts between coal development and agriculture, requested the preparation of a spatial territorial plan for the region (Resolution n.º 38/2012) (Government of Mozambique, 2012b). The aim of the plan (the Special Spatial Territorial Plan, or PEOT in Portuguese) was to support sustainable integrated development of the Zambezi Valley. The ministry also requested the development of an SEA for managing the impacts at the strategic level in the Zambezi region (Resolution n.º 38/2012) (Government of Mozambique, 2012b). Development of the SEA was supported by the Netherlands.²

It was the first time an SEA was used in this type of planning process in Mozambique. SEAs are not legally required in Mozambique, but the Government of Mozambique is increasingly recognizing SEAs as a systematic approach for improving decision making on policies, plans, and programs.

The main reasons for carrying out the SEA for the Zambezi Valley (TPF, 2014c) are as follows:

- high potential for social, economic, and ecological development

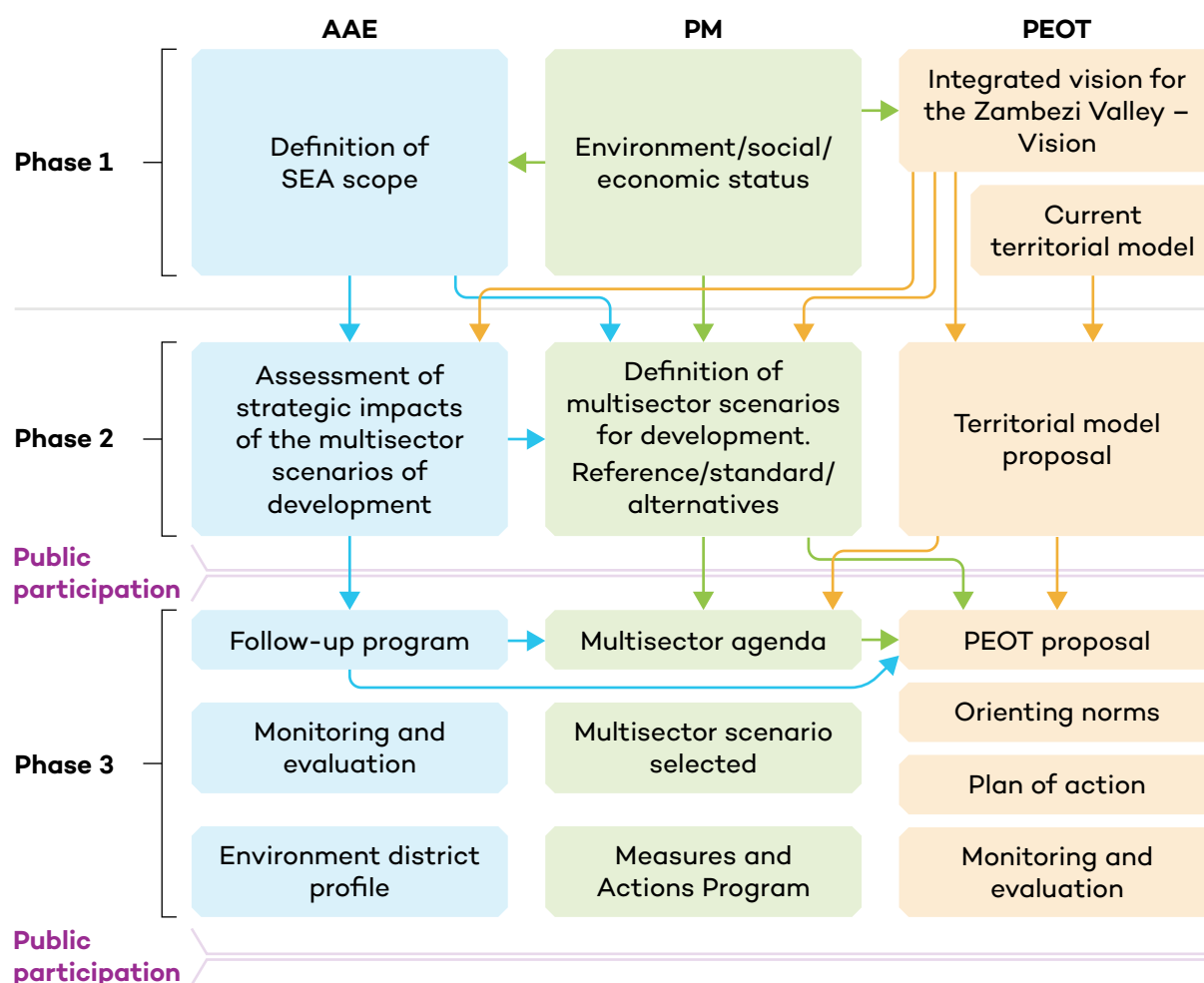
- high level of investment for the development of key sectors
- various sectoral interests with a spatial focus
- absence of a territorial framework harmonizing and conciliating diverse activities
- lack of empowerment of local communities
- need for reaching consensus on land-use planning
- need for better articulation and coordination of development initiatives by local decision-makers

Interlinked Planning and Evaluation Processes

The SEA (Avaliação Ambiental Estratégica, or AAE) was connected to two plans: a special territorial plan and a multisector plan.

- **Special Spatial Territorial Plan (Plano Especial de Ordenamento Territorial, or PEOT).** The PEOT establishes rules and criteria for land use, making efforts to resolve any conflicts in advance. It is a territorial planning instrument with legal status that, upon approval, will be binding on all public and private entities. It aimed to support a strategic vision for the Zambezi Valley (TPF, 2014b).
- **Multisector plan (Plano Multisectoral, or PM).** The PM identifies and coordinates the interests of various sectors, highlighting key questions and defining priorities. It aimed to ensure the involvement of relevant institutions at different levels with a view to creating a framework for sustainable development of the Zambezi Valley (TPF, 2014c).

² The former Ministry of Environment Affairs (MICOA), currently designated as the Ministry of Land and Environment, requested the Netherlands Commission for Environmental Assessment (NCEA) to assist in an SEA process. The NCEA provided 10 independent advisory reports with input from different expert groups. The Dutch Embassy financially supported the Government of Mozambique to develop the SEA and spatial planning for the Zambezi Valley (2011–2016).

FIGURE 3. Assessment processes

Source: TPF, 2015.

The SEA assessed strategic social and environmental impacts resulting from the planning processes in the Zambezi Valley, with the aim of promoting sustainable development by taking these impacts into consideration when finalizing the Special Spatial Territorial Plan (Resolution n.º 38/2012) (Government of Mozambique, 2012b).

The three processes were closely interlinked (see Figure 3).

The plans were supported by a digital decision support model that continuously integrated baseline information resulting from the PEOT, the PM, and the SEA. The

digital decision support model aimed to support stakeholder engagement and local technical staff (TPF, 2014a).

Institutional Arrangements and Participation Process

Responsibility for the elaboration of the plan and SEA was shared between the former Ministry of Planning and Development (MPD)³ (through the Zambezi Valley Development Authority, which is responsible for the coordination of economic interventions), and the former Ministry of Coordination of Environment Affairs (MICOA)⁴ (through the National Directorate

³ Currently the Ministry of Economy and Finance.

⁴ Currently Ministry of Lands, Environment, and Rural Development.

for Spatial Planning) (Decree n.º 23/2008) (Government of Mozambique, 2008). They contracted consultants to elaborate the plan and the SEA (see Figure 4).

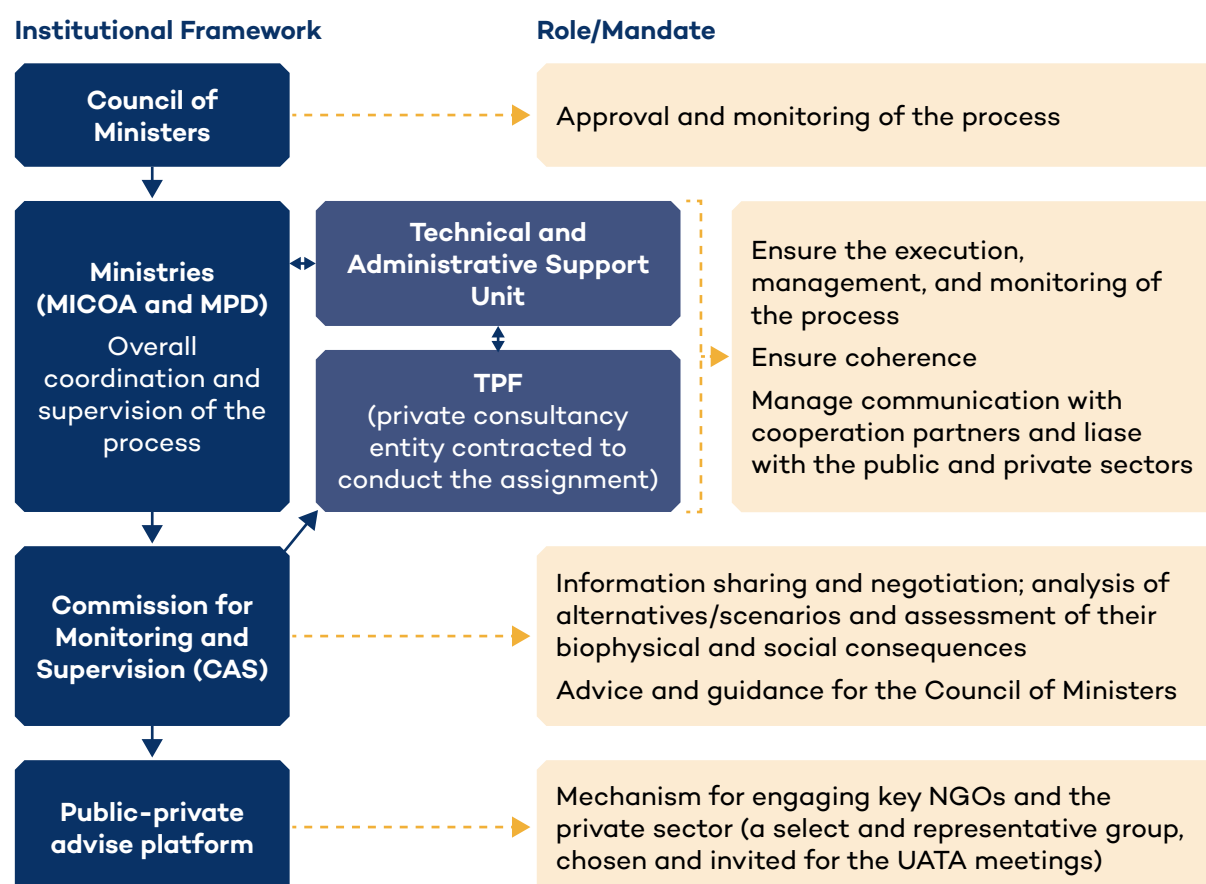
They were advised by a multisectoral Supervision and Monitoring Commission (CAS). The CAS was created through a special resolution approved by the Council of Ministers planning (Resolution n.º 38/2012) (Government of Mozambique, 2012b). The commission provided technical advice and guidance to the Minister responsible for territorial planning and issued statements of “no objection” for the PEOT proposals.

The CAS was a multisectoral structure, composed of interested and affected parties. It included ministries and local and

provincial governments, local authorities, non-governmental organizations (NGOs), miners and mining companies, as well as representatives of women and children living in mining communities (TPF, 2014b).

The SEA created a policy dialogue with different stakeholders (see Table 2 and Figure 5). The affected and interested parties were identified at an early stage. The strategy for stakeholder engagement was carried out throughout the process and included not only CAS meetings, but also several public participation meetings. Meetings involving additional actors, such as community and religious leaders, were held both at the central and at the regional level.

FIGURE 4. Institutional framework established for this process and their roles/mandates



Source: TPF, 2014b, 2014c (adapted from the Portuguese).

Note: UATA = Technical unit of administrative and technical support.

TABLE 2. Overview of stakeholders

1. Central-level public entities	• Ministry of State Administration • Ministry of Agriculture • Ministry of Energy and Mineral Resources • Ministry of Economy and Finance • Ministry of Coordination for Environment Affairs • Ministry of Women, Child and Social Affairs • Ministry of Health • Ministry of Industry and Trade • Ministry of Transport and Communication • Ministry of Public Works and Housing • Ministry of Tourism • Eduardo Mondlane University
2. Provincial and municipal public entities	• Municipalities, provincial, and district governments
3. Public–private platform	• Confederation of Mozambique Economic Enterprises • Enterprises, confederations, and mining associations • Road and transport enterprises (air, railway, maritime) • Enterprises for game reserves, forests, tourism, and fisheries • NGOs and partners

Source: TPF, 2015.

BOX 2. TESTIMONIAL FOR THE ADVOCACY FOR THE RIGHTS OF WOMEN AND OTHER SOCIALLY VULNERABLE GROUPS IN MINING INVESTMENT

“I think it was a very participatory approach; I witnessed many CSOs [civil society organizations] involved in the public consultation meetings; we recognized that public participation was a good tool to mobilize and create awareness among women and other vulnerable groups. It was an opportunity to hear women’s opinions and concerns, but there is still room for improvement. The gender issues were not properly addressed in the SEA process for the Zambezi Valley, specifically the culture and gender stereotypes still prevailing regarding women empowerment, which affect and seriously impact the quality of the participation of women and other vulnerable groups—its “culture norms” that the men’s domination over women in terms of decision making.”

By Nzira de Deus, Executive Director for Women’s Forum Network

There was also criticism: while the SEA was an opportunity to hear women's opinions and concerns, questions were raised about the meaningful participation of female and male stakeholders from different socio-economic and user groups (see Box 2). There were

also pessimists who viewed the SEA as just another tool developed by environmentalists for environmentalists (Nzira de Deus, personal communication, 2024).

FIGURE 5. The participation process

	Phase 0	Phase 1	Phase 2	Phase 3	Phase 4
UATA meetings	Meetings with a UATA				
Institutional consultation	Zambezi River Basin organizations	District governments			
	Meetings with provincial and national directorates; meetings with the private sector				
Public hearings			First public hearing meeting		Second public hearing meeting
Public consultations					Public consultation
Interactive workshops			Interactive workshop in land use		
CAS meeting			Meetings with CAS Commission for monitoring and supervision		Meetings with CAS
Training sessions	Training sessions to local government officers		Training sessions to local government officers		Training sessions to local government officers

Source: TPF, 2015.

4.0 Contents of the SEA

Basic Information

The region is characterized by three main structuring systems:

- hydrological system
- land use and land suitability system: agriculture, forestry, multiple use, and extractives
- natural resources conservation use and suitability system

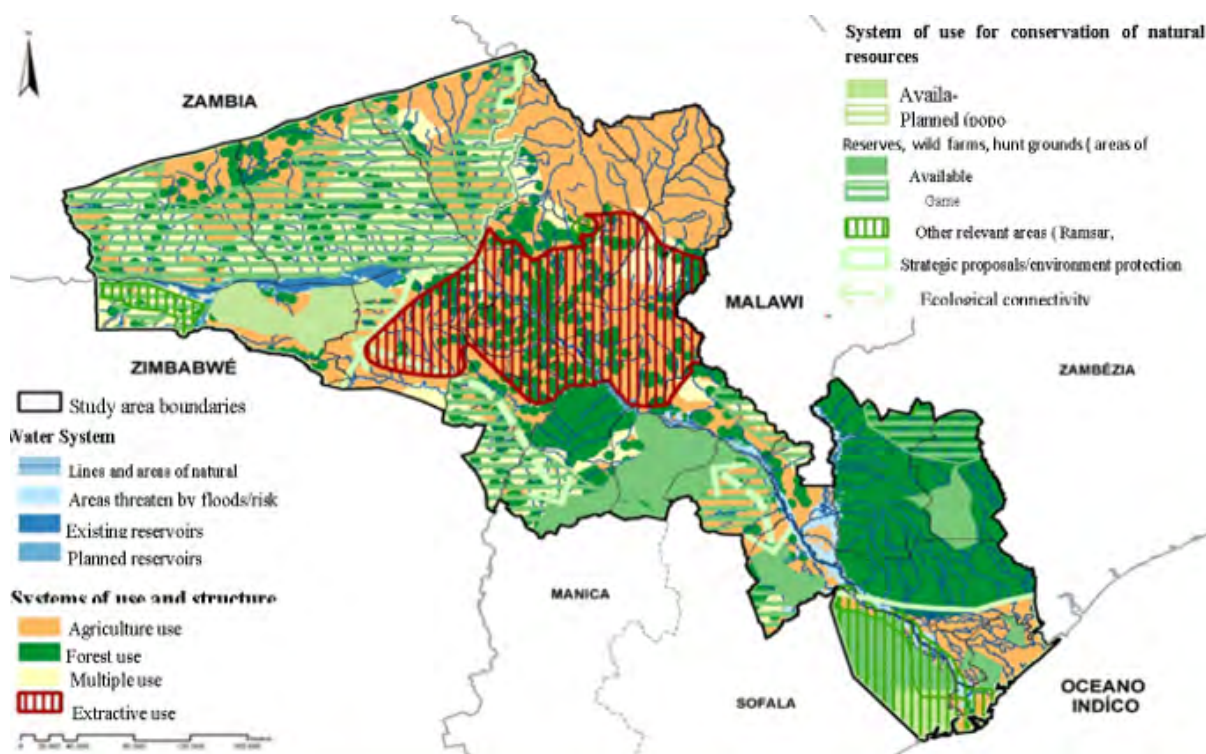
The SEA presented the three structuring systems on one map to show their overlays. This helped to get an overview of existing and potential challenges between these systems (Figure 6) (NCEA, 2011).

In addition to the three main structuring systems, the region has three key assets relevant to mining and other sectors. The SEA used a similar methodology to present these assets (Government of Mozambique, 2021):

- Main networks (three maps: roads, railways, and rivers)
- Strategic points (six maps: border points, maritime-river, airport, health points, education points, hydroelectric developments)
- Important urban centres (six maps: provincial headquarters, district, municipality, etc.)

The resulting maps provided a reference for land use, infrastructure, and natural resources assets of the Zambezi Valley.

FIGURE 6. Structuring systems in the Zambezi Valley



Source: TPF, 2014b.

Alternatives

The consultants identified four alternative scenarios for the future development of the region. They were based on current and planned activities in agriculture, mining, and other industries, as well as on vision, opportunities, constraints, and development prospects of these sectors (TPF, 2014a). The alternatives were: a) maintaining the identity of the region, b) creation of profits for the local population, c) protection of natural resources, and d) large-scale exploration of natural resources.

The SEA assessed the four alternative scenarios against key environmental and social issues:

- deforestation and erosion: fire risk and forest felling
- water resources: risk of flooding, water availability, water use, and contamination of surface and groundwater
- biodiversity conservation
- poverty and social vulnerability: increase in employment, increased productivity, and increased coverage of infrastructure and basic social services
- climate change: floods, droughts, or cyclone effects

The chosen scenario was a mix of elements of the four alternatives. Critical issues that were identified in the SEA process related to resettlement, land-related conflicts, management plans for coal exploration, and climate change. There are increased risks of flooding, more intense cyclones, and rising mean sea levels as a result of climate change, as well as increased risks of drought around the Zambezi Valley (Government of Mozambique, 2019). To effectively address these issues, the SEA recommends the adoption of specific measures.

The resulting PEOT elaborates the chosen scenario. It also includes mitigation measures to reduce negative impacts on communities and the environment (TPF, 2014). It is accompanied by a program of 200 actions and measures and so-called “orienting norms” (e.g., specific conditions for the use of natural resources) that have to be translated into lower-level spatial planning instruments (see Figure 7). Responsibility for implementation, monitoring and evaluation is assigned to specific actors: 20 ministries, four provincial governments, 25 district governments, and five municipal governments (Government of Mozambique, 2020, 2021). An SEA monitoring plan is set up under PEOT to regularly assess the implementation of recommendations and guidelines.

Mining

The SEA was fundamental for creating an enabling environment for mining sector governance. It identified environmental and social priorities in the mining sector and assessed existing capacities for addressing these priorities (see Box 3).

BOX 3. ENVIRONMENTAL AND SOCIAL PRIORITIES IN THE MINING SECTOR

Mozambique has enormous and diversified mineral resources potential. Environmental and social priorities in the mining sector are as follows:

- Ensuring the growth of the mining sector in accordance with principles of sustainable management and exploration of natural resources. Specific measures and actions are to
 - set up geologic database mapping
 - improve information system management
 - develop strategic plans for the sub-sectors of coal, metal resources, and industrial mining
 - reinforce monitoring and compliance mechanisms (investments monitoring and prospecting data collection)
- Promotion of building infrastructure to support the mining industry in coordination and alignment with activities in other sectors to enhance investment and increase the exploration and commercialization of mineral resource goods.
- Ensuring the benefits of mineral resources comply with justice and equity principles for all Mozambican citizens, through the application of legal mechanisms for sharing economic gains and shareholding of large-scale projects, involvement of the local communities in mining investment, compliance with best practices in the resettlement process, job creation, capacity building, and preservation of the cultural heritage.
- Disseminating the fiscal incentives and public–private partnership opportunities in the mining sector.
- Providing technical assistance to improve the practice of artisanal mining.

Source: Government of Mozambique, 2021.

5.0 Results

Results from the SEA process were already visible during the initial stages. Government institutions showed an increased environmental commitment. In 2012, many ministries created environment units responsible for coordination, management, and articulation of all issues related to the environment, including EIA/SEA and climate change. Initial results on the social front included the adoption of a decree by the Mozambican government to regulate resettlements by economic projects (August 2012), establishing basic requirements for housing and social services infrastructure (Government of Mozambique, 2012a).

Main outcomes for mining relate to deepening the dialogue around mining policy and legal reforms (see Box 4). The PEOT was approved by the CAS in October 2016. Five years later, parliament approved the SEA-PEOT in 2021, which now makes it a mandatory instrument that requires the implementation of all recommendations and actions contained in the document, especially in the region (Resolution n.º 9/2021 of the Government of Mozambique, 2021).

After its legal approval, government officials working on territorial planning disseminated the SEA-PEOT at national and sub-national levels, and parliamentarians discussed the law proposal with their constituencies. They travelled all over the country for

consultation, collecting contributions from different spheres of society, including public servants, CSOs, the private sector, and local authorities, in order to improve the PEOT/SEA Act. This allowed for fruitful dialogue and feedback from affected people and provided a sense of belonging to the process

for the communities that are affected by the investments made in their regions.

The SEA is used as a guiding instrument for designing the long-term strategic plan of the Zambezi Development Agency, the Zambezi Valley Region Development Plan.

BOX 4. INFLUENCE ON MINING

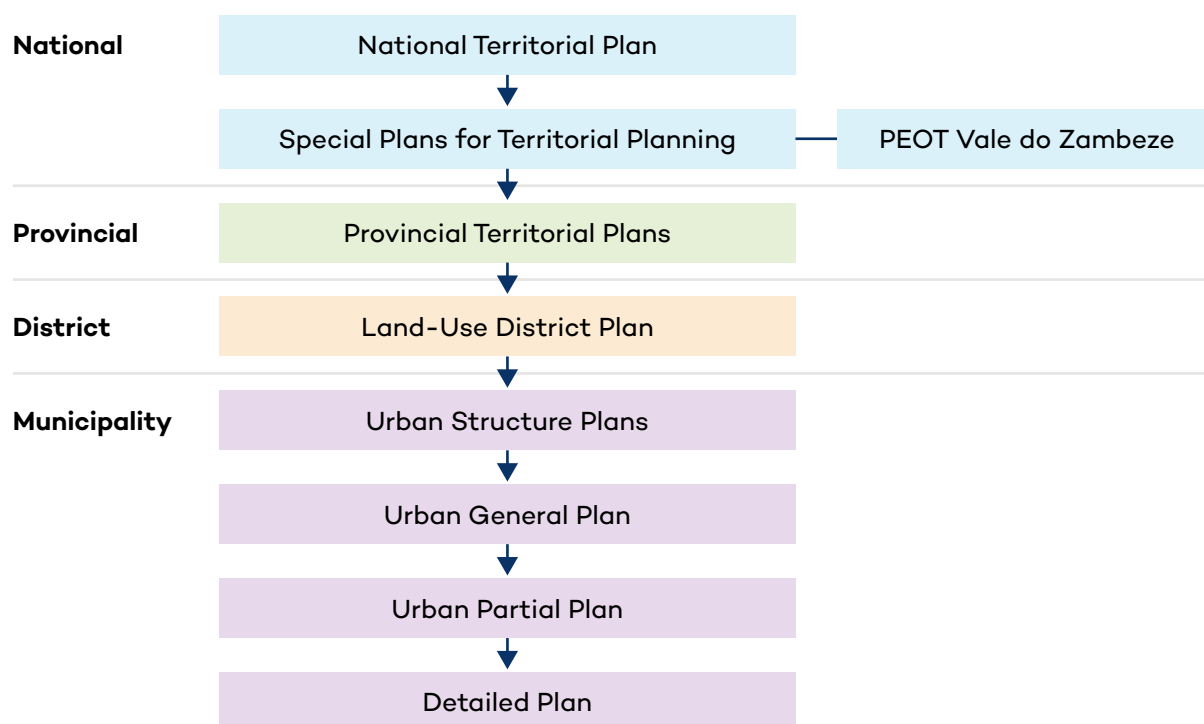
The SEA created conditions for ensuring greater transparency, enhanced participation of local government, and CSOs. A specific result was the creation of the **National Platform for the Extractive Industry**, composed of government institutions, CSOs, and the private sector. The platform discusses issues related to good governance and transparency of the mining sector. It still exists (Centro de Integridade Pública, 2022; I2A Consultoria e serviços, 2023).

Other concrete results relate to the integration of environmental and social considerations in the 20-year-old mining law framework, the Lei de Minas. The law is currently being updated and reflects many elements that were also included in the SEA for the Zambezi Valley (Government of Mozambique, 2021):

- The new mining law includes an article on protected areas stating that to guarantee the harmonious development of the national economy, and to protect interests related to national defence, biodiversity, and the environment, certain areas may be excluded from or subject to restrictions on mining activities.
- The new law stipulates that mining activities should be carried out in accordance with good mining and socio-environmental practices and respect for local communities.
- The new law also defines that 10% of the revenue generated for the state by mining is channelled toward the development of the communities in the areas where the respective mining enterprises are located, as set out in the State Budget Law (Government of Mozambique, 2020).

BOX 5. SEA ZAMBEZI IMPACT- TESTIMONIAL FROM ANASTACIO MAGUMANE, FORMER GEOGRAPHIC INFORMATION SYSTEM TECHNICIAN, ZAMBEZI VALLEY

“Nowadays, the Zambezi Valley Agency, before implementing any activity, looks at the Strategic Environmental Plan (PEOT) and sees what it stipulates, whether the proposed activity will constitute an environmental shock according to what the plan proposes ... we have more sensitivity before making decisions on the ground, which is an asset because in this way we reduce what could constitute alarming environmental issues in the future” (Impacto, 2020).

FIGURE 7. Territorial planning instruments for Mozambique

Source: TPF, 2014b.

Currently, SEA recommendations are integrated into the central and local planning-level, provincial, and district territorial plans (see Figure 7) (District Governance of Mecúfi, n.d.). At the district level, this happens through the incorporation of environmental guidelines into development plans and district land-use plans, aiming to prevent conflicts over resource use. This process involves institutional and public consultations, cumulative impact analysis, and the definition of sustainable management standards, adapting national strategies to local and administrative realities. At the district level, SEA also establishes rules to avoid overlapping activities and to promote the sustainable use of resources, mitigating the impacts of large projects. The process includes environmental diagnosis, participatory consultation (meetings with

district governments and communities), cumulative impact analysis, and the proposal of mitigating measures and land-use planning.

The SEA has created the basis for lower-level physical plans, such as water management plans, integrated development plans, and management plans for conservation areas. Local regional plans for climate adaptation followed the SEA.

The influence of the SEA-PEOT reached beyond the Zambezi Valley. The SEA was very influential in drafting the SEA for heavy sands investment in Gaza Province. Other SEAs are being considered for the oil and gas and mining sectors⁵ and for Maputo province, linked to the Provincial Territorial development plan (Government of the Province of Maputo, 2026).

⁵ Here we are referring to hydrocarbons such as oil & gas for Zambezi Delta and Rovuma basin, which are under the responsibility of the Ministry of Mineral Resources and Energy; they expressed intention to conduct SEA but still in theory, there has been limited progress.

6.0 Challenges and Success Factors

Both the development and implementation of the SEA face a range of challenges. The SEA-PEOT was developed in the context of limited capacity and knowledge of SEA. Key stakeholders in territorial planning had little understanding and experience in implementing SEA in Mozambique. Local communities and decision-makers at both central and local levels expected the SEA for PEOT to be a tool to address social and economic issues. SEA was seen as a source of funding for implementing several social projects which affected the local population. It was perceived as a magical solution to address the complexity of economic and social issues. The lack of experience resulted in consultants playing a strong role in developing the SEA: according to the NCEA (2025), “the sectoral scenarios were formulated by the consultants and not by sectoral ministries.” The SEA could have benefited from a much stronger public sector involvement.

The current challenge of the PEOT-SEA is its implementation. Important challenges are institutional instability and lack of a legal framework. Institutional instability relates to changes in institutions and to government officers who are familiar with the processes being assigned to other duties (S. Chambe, personal communication, 2024). Additionally, the lack of a legal framework for SEA poses challenges for monitoring the implementation of recommendations (Impacto, n.d.).

Raising awareness and building capacity have been key to addressing some of these challenges. This included discussion of the SEA at the ministerial level, training for high-level decision-makers and many other formal and informal trainings. A success factor in the SEA process was the engagement of stakeholders, including the creation of a dialogue platform early in the planning process. All key mining stakeholders were involved, including traditionally sidelined interest groups like villagers, CSOs, and NGOs.

Another success factor was the internal support for the process. In contrast to other planning processes at the time, the Zambezi process was demand driven, responding to a real need to address urgent problems, and had a clear institutional anchor. The process enjoyed the support of MICOA. The Ministry of Environment played a key role by establishing an SEA-dedicated team, which contributed to promoting SEA knowledge within sector ministries.⁶ The Ministry of Mineral Resources and Energy was also strongly involved, not only through its active participation in the CAS and public hearing meetings, but also through regular dialogue with stakeholders, such as the association of miners and coal producers. The Zambezi Development Agency⁷ was fundamental to ensure the SEA considerations were considered when new national and sectoral policies and strategies were developed/ designed.

⁶ We are referring here to the ministries that played a key role in the development of the SEA for the Zambezi Valley, which include the former Ministries of Environment and Planning & Development (coordination and leadership roles of the process):

- Ministry of Public Works, Housing, and Water Resources
- Ministry of Culture and Tourism
- Ministry of Industry and Trade
- Ministry of Agriculture and Rural Development
- Transport and Communication
- Ministry of State Administration

⁷ Under the auspices of the Ministry of Economy and Finance.

7.0 Conclusion

The SEA for the Zambezi Valley in Mozambique is a good example of how an SEA can be carried out. While there are no blueprints for completing an SEA, the SEA for the Zambezi Valley shows key elements that can provide inspiration for other SEAs, both for a specific area and for a specific sector, such as mining.

The design of the process was critical. It covered a region where the rapid development of mining and other sectors created competition over limited resources. The development of the SEA was carried out in close relation to two other processes: the development of a spatial plan and a multisectoral plan.

The strategy for stakeholder participation began early and was carried out throughout the process. The Council of Ministers established a multisectoral commission responsible for supervising and monitoring the process. The SEA had a clear institutional anchor. Two ministries were responsible for coordination and supervision, and both the regional development authority and the Ministry of Mining were involved throughout the process.

The process resulted in a plan that included both environmental and social considerations. A multisector plan highlighted key questions, defined priorities, and coordinated the interests of mining and other sectors. A special spatial plan formed the spatial translation of activities in the region, aiming to minimize conflicts. Four alternatives were identified that were assessed against a range of social and environmental issues. The final plan included a program of actions for reducing negative impacts on communities and the environment. There are clear actors identified that are responsible for carrying out the plan, and an SEA monitoring plan will keep track of implementation.

The plan and its SEA were approved by parliament, which makes it legally binding. The next challenge lies in its implementation.

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