

Commitment to  
Practice (C2P)  
Final Report:  
**Key Learnings  
and Achievements**

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# Commitment to Practice (C2P) Final Report: Key Learnings and Achievements



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## OVERVIEW OF PROJECT



In recent years, numerous companies have made commitments to better recognize and respect land rights throughout their supply chains. For Illovo Sugar Africa (“Illovo”), Africa’s largest producer of sugar, this entailed committing to “zero tolerance for land grabs,” as well as adopting its Group Guidelines on Land and Land Rights (“Guidelines”) and Road Map on Land Rights (“Road Map”).

Although making such commitments is a critical first step towards achieving more responsible investments in land, Illovo and many other companies have struggled to implement these commitments for several reasons.

First, companies tend to not understand what it means to better recognize and respect land rights throughout their supply chain, including what international standards and best practices are for responsible investments in land. Second, company staff lacks experience regarding how to identify existing and emerging land issues, as well as how to develop strategies and work plans to mitigate such risks. Third, key stakeholders – including civil society organizations (CSOs), communities, companies, and government – lack collaborative partnerships, even though each stakeholder plays a critical role in achieving more responsible investments in land. Fourth, CSOs and companies are hesitant or unaware of how to transition from adversarial or nonexistent relationships to collaborative relationships built on trust. And fifth, companies lack management tools designed to specifically measure progress made towards better respecting land rights.

It is within this context that the United Kingdom Department for International Development’s (DFID) Land: Enhancing Governance for Economic Development (LEGEND) Program supported Landesa, with funding from Challenge Fund and in-kind contribution from Illovo, to assist Illovo in implementing its land rights policies and commitments. This initiative, titled the Commitment to Practice (“C2P”) Project, specifically focused on implementation of Illovo’s policies and commitments in Malawi,

Mozambique, and Tanzania. Illovo also committed to scaling project learnings to other countries where it operates, which include Eswatini, South Africa, and Zambia.

In order to address the barriers for implementation highlighted above and, ultimately, help Illovo move from commitment to practice, the C2P Project completed a series of activities focused on achieving five main outcomes.

The first outcome was to build the capacity and buy in of Illovo staff regarding the importance of implementing Illovo's land rights commitments and policies. This includes an understanding of what it means to achieve responsible investments in land and what practical actions company staff should take to ensure implementation.

The second outcome was to build the capacity of local CSOs in Malawi, Mozambique, and Tanzania to help promote more responsible investments by working in direct collaboration with the private sector. This often meant extending CSOs' skillsets and embracing new tools and strategies to help meet the same goals.

The third outcome was to develop partnerships between Illovo staff and CSOs, which included developing each stakeholder's understanding of the other's skillsets and the valuable role each can play to achieve more responsible investments in land.

The fourth outcome was to develop Illovo's understanding of current and emerging land risks and issues throughout its operations. This was achieved through a series of assessments of its operations in Malawi, Mozambique, and Tanzania. Such assessments helped the company to better understand how certain land issues are prevalent throughout its operations (e.g., encroachment and legacy land issues), and that addressing such issues will be a long-term and ongoing journey.

And the fifth outcome was to develop the LandAssess Tool, which is a risk assessment and management framework. The Tool provides a clear and simple set of checklists that generate a report to help companies assess and manage their efforts to better respect land rights.

## PROJECT ACHIEVEMENTS



### I. CAPACITY BUILDING

#### Selection of Land Champions

##### *Illovo Land Champions*

6 Illovo Land Champions  
60 additional staff trained

Through the Project, Landesa and Illovo learned that the buy in and participation of staff across departments is essential for understanding the extent of Illovo's land issues and ensuring implementation throughout the supply chain. Consequently, Landesa extended invitations to participate in project activities to key staff across the company.

Overall, Landesa built the capacity of over 60 additional Illovo staff members, including senior executives and in addition to the six Illovo Land Champions.

Although each Illovo country operation shares similarities, they are also distinctly different because of each country's unique context. Such differences include the business model employed, such as differences between the percentage of sugarcane produced on large-scale estate land vs. outgrower schemes. Country operations also tend to differ in terms of staff awareness of Illovo's land rights commitments and policies, as well as efforts made to implement such commitments and policies. This difference primarily stems from the fact that certain countries have experienced more land issues than others, as each country context differs in terms of its land governance framework, customs and traditions, pressure on land and natural resources, extent of legacy land issues, and level of poverty, among other factors.

To ensure Illovo staff understands the importance of respecting land rights and is properly equipped with the knowledge and skills to implement the company's land policies and commitments, Illovo "Land Champions" were selected for each country of operation. Illovo Land Champions were responsible for scaling C2P trainings,

recommendations, and tools within his/her respective country office, with sustained and detailed capacity building and support from Landesa.

Each Land Champion was selected based on a set of criteria developed by Landesa and Illovo. The criteria included possession of skills and knowledge related to: past, current, and emerging land issues; social, economic, environmental, and resource dynamics and issues; relevant laws and policies; company plans to expand operations; and smallholder parcels used and not used for sugarcane production. Furthermore, Land Champions were required to demonstrate a long-term commitment to implementing Illovo's land policies, as well as possess experience developing relationships with key stakeholders, including communities, civil society, and government.

Because each country operation varies, Land Champions were selected from a range of departments to ensure adherence to the selection criteria. Such departments included Business Affairs, Agricultural Extension, and Human Resources.

### *CSO Land Champions*

Landesa distributed a questionnaire to CSO and Illovo staff who participated in trainings and workshops in the three project countries. One of the objectives of the questionnaire was to gauge comprehension of key project concepts, including Illovo's land policies and commitments, key elements of responsible land-based investment (e.g., FPIC, ESAs, etc.), and how investments impact women and men differently.

**For multiple choice questions, respondents answered correctly between 90.91 and 100 percent, depending on the question. For open-ended questions, respondent answers consistently demonstrated a high level of understanding of project concepts and engagement with project materials.**

90.91 to  
100% correct on  
multiple  
choice  
questions

A primary focus of the C2P Project was to select and build the capacity of CSO "Land Champions" to provide external, expert advice and support to Illovo and other companies committed to investing in land more responsibly. This objective recognized the fact that companies will be more effective in implementing their land policies through collaboration with CSOs and other key stakeholders, as CSOs and other

stakeholders possess different and critical skills and perspectives needed to help companies ensure farmers and communities thrive. For example, CSOs are often better positioned to assess companies' impacts on communities and whether disputes exist between a company and communities. At the same time, however, CSOs tend to have nonexistent or even adversarial relationships with the private sector, which has historically served as a barrier to developing and leveraging partnerships.

Each CSO Land Champion was selected based on criteria that included experience or willingness to develop capacity in the following areas: understanding, identifying, and recognizing land rights; assessing direct and indirect impacts of company operations on communities; consulting with communities and other key stakeholders; negotiating and contracting between key stakeholders; and resolving disputes. In addition, Land Champions were required to demonstrate openness and willingness to work collaboratively with the private sector.

Selected CSO Land Champions included LandNet (Malawi), Núcleo Académico para o Desenvolvimento das Comunidades (NADEC) (Mozambique), and Participatory Ecological Land Use Management (PELUM) (Tanzania). Each CSO Land Champion differed in terms of prior engagement with the private sector, which will be detailed later in the report.

## Trainings

A series of trainings were held with Illovo and CSO Land Champions, as well as key Illovo staff throughout the C2P Project. The first round of training entailed approximately one week of activities held in and around each of Illovo's four estates in the three project countries.



The week began with a series of presentations focused on ensuring an understanding of: prevalence of land issues occurring throughout supply chains; corporate land rights commitments and policies, including Illovo's Guidelines and Road Map; international standards and best practices for responsible investment in land; the role of key stakeholders in achieving more responsible investments in land; and the local context of the respective project country, including relevant laws and policies, socio-economic dynamics, legacy issues, etc.

Presentations were then followed by a workshop on the LandAssess Tool. The workshop focused on explaining the purpose and key features of the Tool, as well as how and when to use it. Furthermore, the workshop included exercises that applied the checklists to Illovo's operations. These exercises helped participants become experienced users of the Tool. They also helped participants to better understand the progress Illovo has made to date, where gaps in implementation remain, and what land issues the company is currently experiencing.

The workshop was then followed by a targeted field assessment of Illovo's operations, which was carried out by a combination of Landesa, Illovo and CSO Land Champions, and key Illovo staff. The field assessments entailed key informant and focus group interviews with company staff, outgrower management bodies and farmers, government officials, traditional and community leaders, and community members. The field assessment provided an opportunity to build capacity to consult and build relationships with various stakeholders, as well as to better understand stakeholders' respective opinions, grievances, and expectations regarding Illovo's land rights and uses.







## II. RELATIONSHIP BUILDING

“

The Project managed to bridge the gap that existed between us and civil society... through this project we are partners now.

- Illovo Land Champion on the C2P Project's relationship building activities.

A primary objective of the C2P Project was to build collaborative partnerships between Illovo and local CSOs in each of the three project countries to achieve more responsible investments in land. Although the value of different stakeholders working together to achieve a shared goal is long established, developing and leveraging such partnerships is impossible without building trust and a mutual understanding between both parties. This entails identifying areas where both parties share common ground, even despite the fact that they also share many differences.

Although Illovo, LandNet, NADEC, and PELUM expressed an openness and willingness to put their differences aside and work together to achieve more responsible investments in land, hesitation and skepticism were still present. Each CSO also varied in terms of its prior engagement with and opinion towards the private sector.

For example, in one case, the CSO Land Champion had previously released adversarial publications against Illovo and was not open to sitting at the same table as the company. In fact, a staff member from this CSO revealed that when she arrived at the first training between Illovo and the CSO, she came with a “*purely negative attitude toward the private sector.*” Another CSO had no level of experience engaging with Illovo or the private sector, as they had difficulty reconciling how a mission-based organization could find common ground with a for-profit company. The other CSO had engaged with Illovo indirectly and on a discrete basis, working primarily with smallholder farmers that

supply sugarcane to the company and with communities that live in close proximity to its operations. However, this CSO had minimal direct engagement with Illovo.

Similarly, Illovo staff also varied in terms of their openness and perceived value of working with CSOs. For example, one staff member stated that the company’s “*default perception of CSOs*” is one of skepticism and “*to be careful.*” Another staff member stated that the company believed that CSOs “*only wrote negative things*” about the private sector, and therefore, the company “*was not comfortable*” to meet and work with CSOs.

Despite these initial doubts, Illovo and CSO staff members were able to develop relationships built on trust and mutual understanding. The first and most important step that was taken to achieve this was for Landesa to facilitate an in-person introductory meeting between the parties, prior to officially beginning the project activities. This meeting provided an opportunity for both parties to display good will and express their interests for participating in the project. This meeting also laid the foundation for both parties to feel comfortable sharing their opinions and perspectives – even if they differed – throughout the trainings and other project activities. It was also valuable for Landesa to share its experience as a CSO working with the private sector, which provided a helpful case study for how to develop and leverage such partnerships to achieve outcomes in favor of both parties, such as improving the livelihoods of communities CSOs seek to serve and companies depend on.

In addition to this introductory meeting, Illovo and CSO staff jointly participated in a majority of project activities, including trainings, workshops, and assessments. These activities provided opportunities for both



stakeholders to become comfortable with sharing information and ideas and developing strategies and solutions that met both group’s needs and expectations.

At times, it was appropriate for certain activities to be carried out by only the CSO partner, such as community consultations and fieldwork focused on independently assessing the impacts of Illovo’s operations, as well as potential disputes between Illovo, farmers, and communities. When the need for CSOs to work independently was identified, it was clearly communicated to Illovo to ensure their understanding and support. As a result of these efforts made to build a relationship between Illovo and local CSOs, a significant shift was made in terms of their comfort working together and how they valued the other’s skillset and role in promoting more responsible investments in land.

Although Illovo, LandNet, NADEC, and PELUM built collaborative partnerships throughout the course of the C2P Project, which in some cases meant overcoming adversarial relationships, it is important to note that all parties still need to work hard to maintain such partnerships beyond the Project.

“

In the past, Illovo was not willing to hear from us, and we were not willing to hear from Illovo... to date we have seen that there is a change... **we are able to directly communicate**, liaise on issues of land governance... and **we are willing to hear the other side**, instead of quickly rushing to judge and reach a hasty conclusion.

- CSO Land Champion on the C2P Project’s relationship building activities

For example, one CSO mentioned that prior to the C2P Project, zero trust existed between them and Illovo; and that after the Project, the CSO ranked its trust for Illovo as a six, on a scale of one to ten. The CSO explained that Illovo is now at a place where “they are open to listening and receiving” recommendations and opinions from the CSO; however, the company still hesitates to communicate with the CSO when it decides not to act on recommendations because of a difference of opinion or other constraints. This lack of communication is viewed as a barrier to building greater trust between the two parties.

In order to overcome this barrier and ensure consistent communication, it is important for both parties to recognize that disagreement is inevitable between any two parties, let alone between a CSO and a private company. It is not about whether both parties will disagree, it is about how they chose to disagree. In the example noted above, the CSO explained that an absence of or a pause in communication is what erodes trust in a company, not necessarily what the company is communicating. In other words, if Illovo or another company cannot or will not carry out a CSO's recommendations, it should clearly express why it cannot (e.g., cost, time, lack of staff capacity, etc.). Without providing an explanation, CSOs are left to assume bad will or intent on behalf of the company, which will ultimately damage relations and the possibility of both parties working collaboratively in the future.

*Additional quotes from Illovo and CSO Land Champions regarding the C2P Project's relationship building activities.*

*Illovo Land Champions:*

- “[When we began] the Project it was difficult to understand why we would need a CSO to work with... [however] through this project we have come to learn that **CSOs are there for a good cause... and as long as you respect your stakeholders and do your best, you have nothing to worry about.**”
- “It has been a **radical change at a personal, management, and business level** [to work with CSOs].”

*CSO Land Champions:*

- “**When we were outside, we know less about companies.** After this engagement we have come to understand them better and come to see there are things we have in common. **We may have different angels, but there some points where we come together.**”
- “Coming into this [project], Illovo did not trust our intentions we did not trust their intentions, but we said ‘let’s see what this Project has to offer.’ **Without an intermediary or a Landesa... it might take longer... but I hope over time that perception will change.**”



### III. DEVELOPMENT OF THE LANDASSESS TOOL

A major achievement of the C2P Project is the development of the LandAssess Tool – a due diligence tool that allows companies to assess risks and manage efforts to more responsibly invest in land. It provides a clear and simple set of checklists that generate a report to help companies assess and manage how they respect land rights. The LandAssess Tool responds to the gap between companies’ commitments to recognize land rights and their ability to give life to that commitment throughout their operations.

Using the New Alliance for Food Security and Nutrition’s *Analytical Framework for Land-Based Investments in African Agriculture* (“Analytical Framework”) as a starting point, Landesa created the LandAssess Tool over a two-year period that entailed piloting the Tool throughout Illovo’s operations in Malawi, Mozambique, and Tanzania.



My key job is to use the Tool to identify the most risky areas... and put in actions to address them. That is the job we have started; it is a long way, but **with the guidance of the Tool, I’m sure we will get to where we intend to be.**

- Illovo Land Champion regarding the utility and potential future impact of the LandAssess Tool

#### Piloting Process

In each project country, Landesa held a workshop with Illovo and CSO Land Champions, as well as key Illovo staff and management, to run through the current prototype of the Tool. The goal of the workshop was to assess users’ understanding of the Tool’s content and objective, as well as satisfaction with its main features and level

of detail. Workshop participants' feedback was collected throughout the workshop, as well as through a survey distributed after to the workshop to ensure candid feedback.

Between project country visits, Landesa reviewed workshop participant feedback and revised the Tool accordingly. Once the Tool was revised, Landesa held the same workshop in the next project country. Although this meant that Illovo and CSO Land Champions in each country were presented a different version of the Tool, all parties were kept updated of changes to the Tool through remote trainings. Furthermore, during the C2P Project Close-Out Workshop, all Illovo and CSO Land Champions, as well as key company staff, received a presentation on the final version of the Tool.

### **LandAssess Tool Features**

The LandAssess Tool is comprised of a series of checklists that one can use to measure whether a company's operations align with the key elements of responsible land-based investments. Such key elements range from consulting and engaging with communities impacted by operations to ensuring a company enters into fair and equitable contracts to obtain or use land. Separate checklists are provided depending on whether the company is assessing its own estate landholdings or outgrower farming arrangements.

Instead of responding "yes" or "no," or "complete" or "incomplete" to each checklist item, users designate a "status" that indicates the percentage of progress the company has made for each category. Furthermore, users can provide links to documentations or provide commentary to support the status selected. For each checklist item, users also assign a level of risk, which can entail a variety of different risks to the company, farmers, and communities. The level of risk may or may not correlate with the status.

After completion of each checklist, a report will automatically generate for all categories assigned a status of completion of < 51% or any category assigned a risk of 2 (medium) or 3 (high). In the report, users are then asked to detail what follow-up actions the company will take to make progress towards completing the checklist item and to mitigate the risk. Furthermore, users must also indicate which internal and external

actors will be responsible for carrying out the follow-up actions, as well as detail a timeline for completion of each follow-up action.

While the checklists help companies ascertain where they are in relation to their land rights commitments, the reporting section of the LandAssess Tool supports short- and medium-term planning by highlighting and prioritizing areas for improvement and providing space for the company to plan next steps.

For an in depth explanation of the Tool's functions and features, see the Tool User Guide and Training.



The Tool helps you to **[understand] your operation from a land rights point of view...** and how to prioritize issues, so you earn the social license to operate in the community.

- Illovo Land Champion regarding the utility of the LandAssess Tool

### **LandAssess Tool vs. Analytical Framework**

The Analytical Framework provided a valuable starting point for the development of the LandAssess Tool because its primary intended users are agribusinesses operating in Africa. This differs from other international and regional standards and guidance documents, which are tailored more toward government and civil society users.

Throughout the piloting process, however, significant additions and changes were made that make the LandAssess Tool materially differ from the Analytical Framework.

First, although the LandAssess Tool checklists contain the same content as the Analytical Framework, the content was modified to ensure companies are thoroughly assessing compliance with the key elements of responsible land-based investment. For

example, for certain checklists, additional questions or explanation were included, such as assessing land rights and carrying out consultations and engagement with communities. Furthermore, additional checklists were added for key topics, such as encroachment and land use risk, as these risks were prevalent throughout Illovo's operations.

Second, unlike the Analytical Framework, which requires users to answer "yes" or "no" to checklist questions, users of the LandAssess Tool are asked to designate a "status" that indicates the percentage of progress the company has made for each category. Users are also unable to mark any checklist item as 100% complete. This omission was intentional because a company's efforts to responsibly invest in land are dynamic and ongoing. Therefore, compliance with the key elements of responsible land-based investment should never be considered a one-time exercise.

Third, the LandAssess Tool replaced the Analytical Framework "red lines" (no-go thresholds) with a risk level of 1-3, with 1 meaning low risk, 2 meaning medium risk, and 3 meaning high risk. Although Landesa agrees that in certain scenarios a risk may be present that requires a company to cease operations until it is resolved, what constitutes a red line will vary depending on the circumstance and context in which a company is operating. As such, it is important for users to determine the risk level based on circumstance and context, as opposed to it being prescribed. Additionally, although a company may be able to adhere to "red lines" for greenfield investments, it may be unrealistic for a company to do so for a brownfield investment, as the company is already in operation and therefore it may be unrealistic for it to cease operations until the issue is resolved. Instead, it is more realistic to require a company to develop an action plan to address the land risk while maintaining operations.

Fourth, unlike the Analytical Framework, the LandAssess Tool auto generates and populates a report with checklist items assigned a status of completion of < 51% or any category assigned a risk of 2 (medium) or 3 (high). In the report, users are then asked to detail what follow-up actions the company will take to make progress towards completing the checklist item and to mitigate the risk, as well as indicate which internal



and external actors will be responsible for carrying out the follow-up actions within a certain timeline. Through inclusion of the report feature, the Tool becomes a dynamic resource that can be used on an ongoing basis to help companies assess and manage risk.

Fifth, the LandAssess Tool expands the reach of the Analytical Framework by explicitly applying to both new and existing operations, as well as a range of business models schemes (e.g., large-scale estate landholdings and contract farming arrangements). For example, separate sets of checklists are provided for estate land and outgrower schemes.

And sixth, the LandAssess Tool and User Guide is available in English, Portuguese, and Swahili to ensure key company staff and local CSOs in all three project countries are able to use it to achieve more responsible investments in land.

*Additional quotes from Illovo and CSO Land Champions regarding the utility and potential future impact of the LandAssess Tool:*

- ***“The Tool has allowed us “to understand [land] issues in a more engaging way; engagement has been a key lesson from the Tool. [The Tool] is creating a new way for us to relate to stakeholders and earn a better license to operate in the community.”***
- ***“As a next step after the C2P Project, “we should use the Tool as a way to bring together key stakeholders towards a common goal” and to “raise awareness.”***



#### IV. INCREASED UNDERSTANDING OF LAND ISSUES & RISKS



There has been a positive change and a positive focus towards land rights. I think previously it was like another issue, and we at least thought that it [didn't] affect us until this project. And now, **through this project, issues of land rights and land tenure have been elevated to another level in the business agenda.**

- Illovo Land Champion regarding how the C2P Project has changed Illovo

A primary objective of the C2P Project was to assist Illovo in assessing its operations in Malawi, Mozambique, and Tanzania to better understand the type and extent of land issues and risks present throughout its operations.

##### Targeted Assessments of Country Operations

As a first steps towards assessing Illovo's land issues and risks, Landesa carried out targeted assessments of Illovo's operations in each project country and in collaboration with CSO and Illovo Land Champions. Each assessment entailed a series of key informant and focus group interviews and discussion with key Illovo staff, including managers of the respective country operation; outgrower management bodies (e.g., trusts and associations); local CSOs; women and men outgrower farmers, including smallholder farmers; local government officials; traditional leaders; and women and men who are members of communities located in close proximity to Illovo's operations.

These interviews and discussions focused on understanding whether and to what extent Illovo had begun implementing its land policies and commitments; key stakeholder perceptions regarding Illovo's reputation as a responsible company, with particular emphasis given to whether the company was viewed as one that properly recognizes and respects land rights; Illovo and its suppliers rights to land it currently (e.g., duration and

terms of leasehold); past, present, and emerging land issues involving Illovo, the government, outgrower schemes, and neighboring communities; any potential land use changes or expansion plans that could present a high risk of land issues; impacts of operations on women vs. men farmers and community members; and the general socio-economic dynamics of the area in which Illovo operates to better understand underlying pressures on land and natural resources (e.g., rate of population growth, land and natural resource scarcity, etc.).



Findings from each targeted assessment were documented in a report and shared with Illovo staff in the relevant country of operation and at the group level. In addition to the findings, a series of recommendations were included in the report, which laid out proposed next steps for responding to present and emerging land disputes, developing strategies to mitigate the risk of future land issues, strengthening relationships with key stakeholders (e.g., government, farmers, CSOs, communities, etc.); carrying out follow-up assessments or targeted research to better understand the extent of land issues and risks; and building staff capacity to better address and mitigate land issues and risks. Overall, these assessment reports provided a baseline understanding for each project country regarding where it stood on its journey to better respect land rights, as well as what are the major land issues and risks are that the company should be prioritizing.

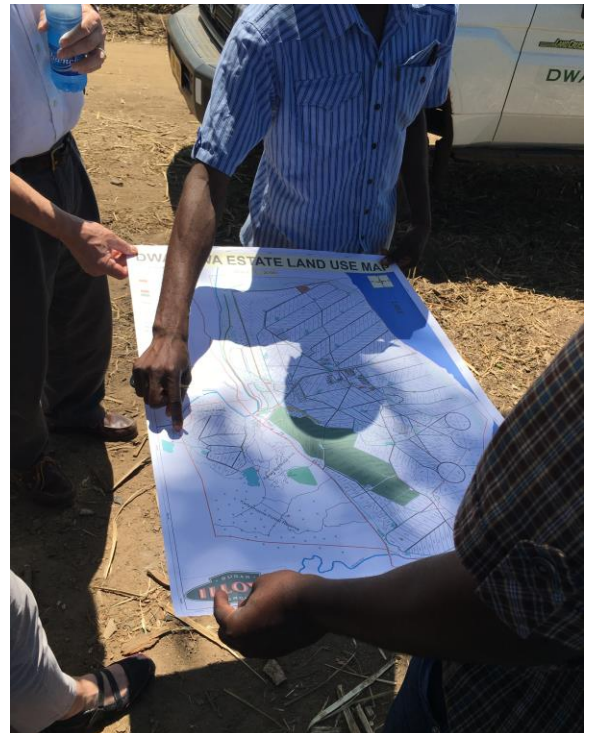
The assessment reports revealed the fact that each project country shares many of the same land risks and issues, although they vary in terms of the degree of intensity and seriousness. Regardless, land issues and risks shared among countries provided support for the need to develop group-level action plans to address and mitigate such risks (e.g., encroachment, need for boundary clarification and grievance mechanism, etc.).

For greater detail on the assessment findings and recommendations, see the assessment reports.

## Activities to Further Assess or Mitigate Specific Land Issues and Risks

Based on the assessment findings, Landesa, Illovo, and the local CSO partners carried out follow-on activities to further assess or mitigate specific land issues or risks. These activities were primarily carried out by the local CSO partners, with Landesa providing high-level support and oversight in terms of designing the activities, ensuring quality of work products, and managing relationship dynamics between local CSOs and Illovo.

In Malawi, LandNet carried out stakeholder mapping of communities encroaching on areas of land within Illovo's Dwangwa Estate. The purpose of the stakeholder mapping was to better understand who made up the communities, the driving forces of encroachment, and the community leadership structures in place that the company could engage with to help resolve such disputes. In addition to documenting findings on these topics, LandNet provided recommendations for what government departments Illovo should consult with to better address and mitigate ongoing issues of encroachment in Malawi. Although encroachment still remains an issue throughout Illovo's operations in Malawi, the C2P assessment and activities provided valuable insights into the need to systematically address this issue through development of group-level strategy and action plan, as well as through collaboration with key stakeholders.



In Mozambique, the assessment revealed that municipal government in the district where Illovo operates is a key stakeholder for implementing Illovo's land policies and commitments. As such, NADEC and Illovo staff in Mozambique conducted a series of government consultations to sensitize the government on the company's land policies and commitments, and to brainstorm ways to coordinate and collaborate towards

achieving implementation. In addition, the targeted assessment revealed that Illovo staff in Mozambique had less of an understanding of past, present, and emerging land issues and community perceptions in the area in which it operates. This triggered the need to carry out additional key informant and focus group discussions and interviews, as well as to provide additional guidance and support towards ensuring Illovo's internal capacity was at a point where it was ready to begin implementation of its land policies and commitments.

In Tanzania, the assessment revealed that Illovo is exploring the possibility of approximately doubling the number of growers it sources sugarcane from, which has the potential to affect women and men in 20 villages and 7 townships. To help Illovo better understand the potential impacts of the expansion on women and men's land rights and uses,



intra-household dynamics, food security, and sources of livelihood, PELUM conducted research in the proposed expansion zone. Through a series of key informant interviews and focus group discussions with women and men in all villages and townships within the proposed expansion zone, PELUM was able to identify areas of risk and to propose recommendations to mitigate or avoid such risks. This research has since been used to inform next steps taken by Illovo to further explore the feasibility of expanding its grower base and has helped shape procedures and measures to further assess and mitigate risks associated with the expansion. Landesa, Illovo, and PELUM are also actively exploring opportunities to continue their engagement around the expansion beyond the C2P Project.

## V. CHANGE IN COMPANY CULTURE

“

[Through the project], our behavior has changed. We have come to understand that listening to and understanding stakeholders is important.

- Illovo Land Champion regarding how the C2P Project has changed Illovo for the better

Throughout the C2P Project, Illovo has made significant progress towards implementing its commitments and policies to better respect land rights throughout its operations.

### **Additional Resources Dedicated to Land**

Although Illovo Land Champions continue to serve as important focal points for coordinating and managing implementation efforts, the Project revealed that the participation of various staff across departments is also required for responding to and resolving land issues, depending on the nature of the issue.



As such, Illovo’s operations in Tanzania established a seven-person Land Committee comprised of staff across key departments, such as Corporate Affairs and Agricultural Extension. Each committee member is responsible for implementing certain aspects of Illovo’s land policies, with specific tasks and responsibilities assigned to each member in line with his or her experience, skills, and responsibilities.

Based on the success of Tanzania’s Land Committee model, Illovo’s operation in Mozambique is now in the process of also establishing a Land Committee. Illovo’s operation in Malawi has yet to establish a Land Committee; however, it now has a separate fund dedicated to preventing and addressing land issues and risks.



After Illovo developed its land guidelines, **the project helped us turn the commitment to practice** – not just rhetoric, but to put it into practice...

- Illovo Land Champion regarding how the C2P Project has changed Illovo for the better

### Development of New Policies and Action Plans

Illovo is currently in the process of finalizing its new Group Land Strategy, which will replace its Road Map on Land. Based on learnings from the C2P Project, Illovo realized that the Road Map was too general and prescriptive. Therefore, the Land Strategy seeks to fill this gap by applying a standard to all countries of operation, while also allowing each country to create its own action plan that is based on the local context, dynamics, and priorities.

The three main principles of the Land Strategy are:

- Land management: to ensure land stewardship across operations;
- Community engagement: in order to build strong relationships with surrounding communities and to promote awareness of land rights; and
- Grower land practices: to support growers to establish secure land rights that will sustain continuous yield improvements

Using these principles, each country is invited to design its own action plan, using tools, recommendations, and strategies developed with the support of the C2P Project. For example, countries are encouraged to map its land, infrastructure, and resources, as well

as ensure its boundaries are clearly defined. Furthermore, Illovo supports the establishment of Land Committees at the country level and the use of the LandAssess Tool to identify and monitor land issues and risks.

In addition to the Land Strategy, Illovo is also in the process of finalizing a grievance mechanism policy and guidance document. This policy and guidance will be coordinated across all countries of operation.

Lastly, Illovo is in the process of developing group- and country-level strategy and action plans for responding to and mitigating encroachment, as encroachment was found to be an issue occurring across all countries of operation.

### **Commitment to the LandAssess Tool**

During the final presentation of the LandAssess Tool to Illovo and CSO Land Champions, as well as key Illovo staff, the company announced that it will be encouraging all countries of operation to use the LandAssess Tool to manage its efforts to invest in land more responsibly. More specifically, each country is encouraged to complete or update the LandAssess Tool on an annual basis to assess the status of land issues and risks occurring at the estate and grower level.

Tanzania is already using the Tool to manage its efforts to better respect land rights, and it is likely that the other countries of operation will follow suit, as staff in Tanzania provided positive feedback regarding the utility and helpfulness of the LandAssess Tool.



We should continue this momentum using the Guidelines and the Tool to help resolve our current land issues and to help guide us through the issues that may emerge in the future... work on the ground needs to get done.



## **Scaling project learnings to Eswatini, Zambia, and South Africa**

Throughout the C2P Project, several steps were taken to ensure that project learnings, activities, and tools were scaled to countries of operation that were not officially part of the project. For example, Illovo staff from Eswatini, Zambia, and South Africa participated in several project activities, including trainings and workshops. Through this participation, Illovo was able to learn that non-project countries of operation are experiencing similar land issues and risks, such as encroachment and lack of community engagement. By learning this, Illovo was able to identify the need for additional group-level policies and strategies, as well as better understand how valuable it is for staff across its countries of operation to communicate and collaborate.

Illovo also shared project learnings and strategies with non-project countries through company-wide communication. For example, Illovo has highlighted the relationship between its operation in Tanzania and PELUM as one that should be replicated in all countries of operation to help better understand dynamics throughout grower and non-grower communities. For example, through research conducted by PELUM, Illovo has a better understanding of gender and food security dynamics in the areas where it operates, and is therefore, able to more effectively engage with communities. Through this experience, Illovo now has an increased understanding of the value of CSOs like PELUM, and will seek to establish and maintain such relationships throughout its operations.

*Additional quotes from Illovo Land Champions regarding how the C2P Project has changed Illovo for the better:*

- *“Since starting this project, the understanding and realization that we are a big company who depends on land to thrive is more evident and understood than before... there are lessons to be learned about business engaging with stakeholders, for their own existence and [for] the sustainability of the communities [where] they operate.”*
- *“The legal compliance on its own is not enough, it requires the backup of the social compliance as well... it is not only about the legal, it is about the social.”*
- *“For a fact, land is a resource that never expands, but population still grows and continues to grow. So issues of land...will still be contentious issues for the future... we need to be vigilant in all that we do in terms of land.”*