

LARGE SCALE COMMERCIAL FARMING AND ITS IMPLICATIONS FOR ENVIRONMENTAL SUSTAINABILITY IN ETHIOPIA: THE CASE OF GAMBELLA REGIONAL STATE

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Abstract

The global food crisis of 2007/8 and fuel crisis of 2007/9 led many, including the Gulf States and several East Asian countries, to re-evaluate their strategies and secure land and water elsewhere, essentially to produce food and fuel and to supply their growing populations. Consequently, in Ethiopia, more than three million hectares of land has been leased to investors for large scale commercial farming, out of which, the total land area of 524,202.58 hectare has been distributed to both local and foreign investors in Gambella Regional State. Hence, the main purpose of the study was to assess the nature of large scale commercial farming in Gambella Regional State with respect to the processes adopted, and its environmental implications. In spite of the fact that the contribution of large scale commercial farming is undeniably significant to the local and national economy, the procedure pursued in allocating land to investors has not been environmentally friendly. Though local communities' tie with their natural environment is very strong, the establishment of large scale commercial farming in the region is disconnecting the environment from its dependants, the rural population, and putting the sustainability of the environment in question unless it is managed with immediate interventions of the concerned bodies.

Key Words: Large Scale Commercial Farming, Environment, Sustainability, Investment

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1. Introduction

One of the lingering effects of the food and oil prices crisis of 2007/08 and 2008/09, respectively, on the world food and oil system is the proliferating acquisition of farmland in developing countries by other countries seeking to ensure their food supplies. Food-importing countries with land and water constraints but rich in capital, such as the Gulf States, are at the forefront of new investments in farmland abroad (Joachim and Ruth, 2009). Consequently, in the past decade an area of land eight times the size of the UK has been sold off globally as land sales rapidly accelerate. In poor countries, foreign investors have been buying an area of land the size of London every six days (ILC, 2011a).

Particularly, in Africa, no matter what the prevailing terminology and ideologies are there, there is now ample evidence that large swathes of African farmland are being allocated to investors, usually on long-term leases (Future Agriculture, 2009). Though it is found to be difficult to get the clear data base of the land leased out in Africa, in 2010, World Bank released its analysis that in 2009 alone the total land under negotiation globally was 45 million hectares, where, 70 percent (about 32 million hectares) was in Africa. While, other analysis by International Land Coalition stated that the total land area under negotiation during the same year was around 80 million hectares, while 64 percent (about 50 million hectares) of these is in Africa (ILC, 2011b).

In Ethiopia studies have shown that the total large-scale land transferred to investors was 1,205,000 hectares, out of which, 49,000 hectares are under the investment by local investors, while the remaining 1,156,000 hectares which constitutes about 96 percent of the large-scale farms (i.e. farms with 2000 hectares or more) are allocated to foreign investors. However, the

Indian investors have acquired 700,000 hectares out of the 1,156,000 hectares, thereby constituting about 61 percent of the total land allocated to foreign investors and 58 percent of the total land area given to all investors. It is also to be noted that European countries are also participating as members of those who owned the land (Elias, 2011).

According to Gambella Investment Agency (GIA), out of 960 investors with investment certificate in Gambella region, 424 of them have received land for agricultural investment, out of which, 12 of them are foreign investors and the remaining are local investors. And, the GIA report of 2013, indicates that, land leasing process has been carried out in the seven woredas (Etang, Lare, Abobo, Gok, Godare, Gambella, and Dimaweredas), where the total land area of 524,202.58 hectare has been distributed to both local and foreign investors. In addition, according to EAILAA report, the total land area available under federal bank is 3.67 million hectares while a total land area of 308,015 ha was given to 19 foreign investors and to 26 local investors.

If ethical and sustainable business principles are followed, large scale commercial farming and private investments can have a positive social impact (OXFAM, 2012). [Large scale commercial farming] bring much-needed capital for agricultural development and, if structured and carried out responsibly, farmland investing can contribute to economic development in the developing world. Specifically, farmland investments have the potential to bring about tangible benefits such as job and income creation; training and skills development for local communities; the development of economic infrastructure such as roads, water supply and electricity, as well

as social infrastructure such as medical facilities, schools and housing; as well as technology and knowledge transfer (Oviedo, 2011).

Contrary to this, as the scale and pace of large-scale land acquisitions increases globally, evidence is mounting that the land rush is out of control and that the price being paid by affected communities is unacceptably high (ILC, 2011a). On the other hand, if it is poorly managed, large-scale land acquisitions can result in multiple negative results like local people losing access to the resources on which they depend for their food security, livelihoods, and their long-standing heritage; undermining access to land and control over natural resources, human right breach (the right to food and livelihood), economic costs, environmental degradation, marginalization, political costs, and other related both human and non-human costs (Catula et.al, 2009; Oviedo, 2011; Alufohai and Oyoboh, 2013). Besides it may be affecting local people by displacing them from their land without adequate consultation or compensation (The Oakland Institute, 2011a), separating people from their land without simultaneously creating opportunities in nonfarm sectors, unemployment and food insecurity (Oxfam, 2011). Moreover, it exacerbates pressures on urban migration (UN DESA, 2010) and it may entail a reallocation of resources for infrastructure to benefit large-scale investments, rather than local communities (Locke, 2009a).

Particularly, one of the international and national debates and notions of large scale commercial farming is about its impact up on the sustainability of environment. This is due to the fact that large scale commercial farming is all about the utilization of land and its content (including internal and external contents). It diffuses different chemicals and other wastes, clean out forests and leads to deforestation, misuse the soil and results in soil erosion, and leads to over irrigation and others (Alufohai and Oyoboh,

2013). In the area where large scale commercial farming is operating, the environmental impacts occur due to undue considerations given by different actors during the process of land allocations, utilization and its administrations, and the absence of frameworks for environmental concern (Desaleny, 2013).

Whereas, there is a dearth of research results up on the impact of large scale commercial farming on environmental sustainability. Thus, this article tried to fill this gap by answering questions like; 1) what is the process of land allocation in Gambella Regional State? 2) What are the impacts of large scale commercial farming on environmental sustainability in Gambella Regional state? 3) What is the community's conception of their environment and large scale commercial farming in the region? 4) Are there any guideline and framework for investors in the region?

Methodology of the Study

Different instruments were utilized to achieve the objectives and to get deep and holistic overview of the issue under study. These are, field visits as a means to observe the commercial farming areas and its environmental impacts; in-depth interview to elicit information from community leaders, investors and government officials, and Focus Group Discussion (FGD) was used to gather information from local pastoralists and semi pastoralists to assess the impacts of commercial farming on their environment. Moreover, as a sample, seven investors were selected, two of them were foreign based (KARATURI, and SAUDI STAR), while five of them were local investors situated at different woredas. And also, government related data has been collected from office representatives, such as Gambella Investment Agency Directorate - under MoARD, and the Directorate of Ethiopian Agricultural

Investment and Land Administration Agency (EAILAA) were selected, and their offices' respective data was analyzed.

Results and Analysis

Basically land acquisition system and commercialization of farming has not been an entirely new phenomenon, western food companies have owned or leased large scale lands in other countries and in Ethiopia for many years. Attempts to modernize land management systems were practiced by giving title either to the peasants who till the soil, or to large-scale farming programs (Adil, 2010). Though their land tenure system and land administration system seem to be totally different from each other, both of the past regimes in Ethiopia had tried large scale commercial farming with different justifications. Under the present government, with the backing of the constitution under Article 40 (3) *“The right to ownership of rural and urban land, as well as of all natural resources, is exclusively vested in the State and in the peoples of Ethiopia. Land is a common property of the Nations, Nationalities and Peoples of Ethiopia and shall not be subject to sale or to other means of exchange”*.

Land belongs to the government and the people, and should not be subject to sale. But, in promoting large scale commercial farming or agricultural investment, the government has been leasing land to both local and international investors. In line with that, TNCs and private investors are acquiring vast hectares of agricultural lands. Several industrialized countries, EU countries, USA, rapidly growing developing nations like China and India, Israel and oil-rich countries, especially from the Arab Gulf, including Saudi Arabia have leased large scale of land in Ethiopia (Adil, 2010). Hence, studies have shown that the total large-scale land area

transferred to investors is 1,205,000 hectares, out of which, 49,000 hectares are leased to local investors, while the remaining 1,156,000 hectares, which constitutes about 96 percent of the large-scale farms (i.e. farms with 2000 hectares or more) are allocated to foreign investors (Elias, 2011:1).

According to Gambella Investment Agency (GIA), out of 960 investors with investment certificate in Gambella region, 424 of them have received land for agricultural investment, out of which 12 were foreign investors. And, the GIA report of 2013, indicates that, land leasing process has been carried out in the seven woredas (Etang, Lare, Abobo, Gok, Godare, Gambella, and Dimawereda) of Gambella, where the total land area of 524,202.58 hectare has been distributed to both local and foreign investors. In addition, according to EAILAA report, the total land available under federal bank was 3.67 million hectare of which the total land area of 308,015ha was leased to 19 foreign and 26 local investors.

The Process of Land Allocation

According to MOFED (1993), during the first decade, the intention of the present government was deep rooted with the policy of Agricultural Development Led Industrialization where small holder farmers were given major emphasis supported by the government and also considered as critical and front runner in fostering national economic development. But, during the second decade, the focus has been shifted to the promotion and development of Large Scale Commercial Farming. Specially, from the early years 2000s, lowland areas including Gambella region have been given due emphasis for large scale commercial farming (Desalegn, 2011). Accordingly, after 2007, the flow of investors' to Gambella region has

shown dramatic increase. The Gambella Investment Agency has been delegated to undertake land leasing process in the region by following two approaches, depending upon the size of land area requested.

In the first case, especially after the year 2007, the flow of investors to Gambella region has shown dramatic increase with the flow of foreign investors has shown significant growth between 2007 and 2009. Due to the increasing number of investors, the regional office capacity could not provide the necessary services demanded by investors. In order to cope up with the problem the regional government has requested MoARD to create a special department, referred to as “Agricultural Investment Support Directorate (AISD)” for handling land leasing process. From 2009-2013, AISD has allocated over 5000 ha of land from Federal Land Bank to both local and foreign investors. Later, the function and responsibility of Agricultural Investment Supportive Directorate (AISD) has been transferred to Ethiopian Agricultural Investment and Land Administration Agency (EAILAA). In this arrangement, the authority to allocate land area to investors from Federal Bank was delegated to EAILAA while curtailing the power of Gambella Investment Agency to decide on this type of land.

With regard to land allocation, Gambella Investment Agency and Ethiopian Agricultural Investment and Land Administration Agency (EAILAA) **directorates** had agreed to work together as stated below:

"... in principle it is the mandate of regional government to process land lease , but by the request of regional government to help them in land lease process we (Regional Government and Ethiopian Agricultural Investment And Land Administration Agency) have entered an agreement with memorandum of understanding on land leasing which has no constitutional and legal ground, and

not binding agreement...rather the agreement serves only for a short period of time until the agency clarifies the role of each office” .

Accordingly, the process of land leasing at federal level, as stated by EAILAA directorate, follows the procedure described below. First, land requisition form must be submitted by the investor to EAILAA , then information will be provided by EAILAA directorate about the land types available for investment. But, if the investor is not a new comer, i.e., he/she is already investing in the region and coming to acquire additional land for extension, the investor must state the size of additional land area needed.

Then, in either of the cases, investors will be asked to submit project document to MoARD along with business plan. If the investor is a new comer, only land available in the federal Bank will be indicated, but if the investor has come with identified land, the office will check whether the land is within the scope of federal Bank or not. After checking, investor's business plan will be evaluated as per the offices' criteria which include financial capability, citizenship, and past financial statement.

If investor's business plan is believed to be sound, EAILAA will write a letter to the regional investment office to demarcate the land and hand-over to the investor. The investor will enter an agreement with the Woreda administration and will pay land lease fee to the same administration. At the end, a copy of the receipt of lease payment and the map of land demarcation will be submitted to EAILAA.

The following sample is taken from one of the orders sent to local government (GRIA) from federal government (EAILAA) to provide land to investors.

Ethiopian Agricultural Investment and Land Administration Agency

No.xxxxDate.xxxxx.

To: Gambella Region investment Agency

Subject: Giving Investment license

As per his request to be engaged in agricultural investment, Mr. xxxx is already accepted by the office (Ethiopia Agricultural Investment and Land Administration Agency) by fulfilling all the necessary criteria's needed to be fulfilled for becoming an investor and also, he has presented his business plan. Therefore, 10,000hect of land is allocated to him by the office (Ethiopia Agricultural Investment and Land Administration Agency) in xxxxWoreda. Hence, hereby the office would like to request you to provide him with investment certificate and to demarcate the land for him.

Source: Gambella region investment agency

After receiving the letter, the Gambella Regional Investment Agency will immediately issue orderto woreda administration to allocatethe requested piece of land to the investor.

, According to the second approach, the regional government has been given power to handle the land lease process where the land areas less than 5000 hectare and in areas outside the jurisdiction of Federal Land Bank. In this case, the regional investment agency administers land lease cases and investment related processes in parallel with the federal government. According to Gambella Regional Investment Agency Directorate, with regard to providing land to investors,the regional office adopts the following procedures:

"As a first step, the investorhimself/herself identifyfavorable and fertile land for the type of investment and the size of land needed (must be less or equal to 5000ha). Then, the requesting investor is expected to submit investment proposal. This investment proposal would be evaluated by Regional investment agency Investment Board in terms of employment opportunity, capital formation, technological development, future development plan, food security and bank financial statement. After assessment, the investment board of the region will permit or reject the invertors' investment proposal. If the board permits to proceed with the investment, the investor will be issued permission letter and will present toworeda administration. Finally, a contract of agreement will be signed betweenworeda administration and the investor."

The Impact of Commercial Farming on Environmental Sustainability

According to Article (44) (1) of the policy document of the Ministry of Work and Urban Development (2008), all persons have the right to a clean and healthy environment. And also Under Art (92), it is stated that:

- (1)Government shall endeavor to ensure that all Ethiopians live in a clean and healthy environment.
- (2)The design and implementation of programmes and projects of development shall not damage or destroy the environment.
- (3) People have the right to full consultation and to the expression of views in the planning and implementations of environmental policies and projects that affect them directly.
- 4) Government and citizens shall have the duty to protect the environment.

Hence, in any context (developmental or non-developmental) it is the right of the people to deserve clean and healthy environment, and to be consulted and express of their views in any decision regarding their environment.

The goal of the Environmental Policy of Ethiopia is to improve and enhance the health and quality of life of all Ethiopians and to promote sustainable social and economic development. In addition, there is constitutional provisions for environmental protection in achieving any kind of developmental projects, because environment is the factor that can affect the present and the future generations' fate at the same time (Ministry of Work and Urban Development, 2008).

In Gambella regional state, a large number of commercial farming is operational and most of them seem to have engaged in unfriendly environmental practices. As per a statement by Ato Dirriba (Directorate of Investment Agency of Gambella):

“.....We have tried to observe what investors were doing in different woredas. On this trip, we noted that investors were cleaning their products with less regard to the environment... “

Also, the Abobo Zonal Administrator stated,

“..... The bad practices we were observing from investors was that they were giving less focus and minimal structured treatment to the environment. Especially, the chemicals they were utilizing for different purposes were washed down to the rivers and has been polluting water, and also they were clearing the forest unhindered”.

All woreda administrators who participated in key informant interview confirmed the view of the above statement. The common understanding of local government officials is that investors are focusing only on their profit, and giving minimal focus for forest and water resources, wild animals and other natural habitat. Moreover, woreda administrators and

Gambella Regional State investment officer had claimed that the EAIAA has never developed a guideline and code of conduct with regard to environmental protection whereby investors are required to comply. They have never created an office for the purpose of monitoring the progress of investors in adopting the set of rules and regulations. Likewise, EAIAA's Land administration directorate confirmed that there is no code of conduct even at Federal level except organizing training for investors on how to protect the environment. But now, due to the existing depletion of natural resources around investment areas, they have a plan to open one department at federal level to design a guideline and code of conduct. In discussion with local residents living around the investment area, one farmer has stated that:

“In our culture the Forest is everything, for us it is our food from where we find roots and leaves for eating, it is our medicine that we use for treatment, it is a source of wood for building our homes.....so our land and its forest is a life line for us But today they have focused over clearing this forest without any consideration for our wellbeing”.

Another resident of the area has stated that:

“.....our forest has a social, cultural, economical and spiritual meaning for us. But now, we lost it , and me and my brothers are working as daily laborers for KARATURI, by abandoning farming that we had practiced before..... so , investors are good and bad at the same time. I do not know how I can tell you. Because, I am just benefited from the road provided by KARATURI, also, working for them. And, I know too, how much they are harming our environment, and I fear for the fate of my children.”

In general, it is possible to conclude that land lease process carried out in the region has multifaceted impacts on local people. The first issue that they

raised with due consideration is about the environment. According to them during the discussion, more than any resource inherited from their fathers and grandfathers in this ecosystem are the forests. But, now, due to promotion of various kinds of investment in the region, the forest resource has been depleted from time to time, the water is being polluted, and also, the wild animal population has been dwindling due to change in the ecosystem. Thus, as investors focus more and more on clearing the forest land for investment the end result would obviously be negatively changing the ecosystem of the region.

Secondly, most peasants residing in the surrounding areas are engaged as daily laborers for the investors by abandoning their own farms.¹ As per the view of Oviedo's (2011), this practice can be stated as "action which may undermine community right over communal resources and deprive local communities of full access to vital resources such as water, forest, and other natural resource. In other words, it is described as "Marginalization of Community Right".

When inquired about *caution they are taking to reduce the negative impact of their investment on the environment*, a manager of one project has stated the following:

" We believe that, in the process of extending land for investment we may affect the environment, we never lie by saying there is no chemical releasing, no forest clearing , and related impacts'. ...we do not have a guideline and code of conduct to be followed, but our project have developed our own guideline based on the training given to us by the government. But, in the future, as much as possible, we will try to improve our practice".

¹ by abandoning their own plot of land, not by displacement/resettlement

Also, another manager of a different project stated as follows:

"... Previously it is true that we have been extremely affecting the environment, especially during the inception period of our investment. But, right now, we are engaged in the previously prepared land for investment. However, presently except the pesticide application on our crop we barely involved ourselves in deforestation. In the future, we do have a plan to launch the second phase of our investment. Hopefully, we will focus on environmental protection in our practices, even though we were not issued with code of conduct and guideline for environmental protection and for other related issues".

The environmental problem and marginalization of local people are the boldly raised issue of agricultural investments established in Gambella regional state. With respect to the impact of commercial farming on environmental sustainability, Gambella Regional State's investment agency had stated that investors in the region come (especially those with the capacity to invest in more than 5000 hectare of land) to regional office with approved and finished process. So, it is not the regional office's mandate to request the assessment aspect of their investment.

Also, The Land Administration Department Directorate within the Ethiopian Agricultural Investment and Land Administration Agency had stated that, the economic, social and environmental impact assessments are undertaken after the land is taken over by the investors. The fact is that investors would not be expected to present assessment report for the land area they took over for farming. From the investors' point of view, there seems to be a misunderstanding. They have submitted a business plan, and they are operating according to the business plan.

Therefore, even if EAILAA claims that there was an assessment no common understanding reached what social, economic and environmental assessment constitutes and the difference between these factors and the business plan.

On the basis of the survey undertaken, some of the investments were on the way to be collapsed due to environmental difficulties and other unexpected factors. More than half of them have never become operational. Surprisingly, some others were dangerously engaged in the destruction of natural resources, like forest and water bodies which have direct relationship with the health, social, economic, and environmental aspect of the society living in the area.



Figure1. Forest destruction in Gambella region

Source: Own field observation

Implications for Environmental Sustainability

The kind of balanced environment sustained prior to large scale investment in agriculture has been replaced with unstable condition. Due to clearing land for farming the bare land is exposed to erosion and as a result the fertile top soil is washed away to rivers and devastating flood is of common occurrence. Some investors, such as "Karaturi" confirmed unexpected flood and a rise in temperature in the region, and due to flood from Baroriver the company lost maize farmed over very large hectare of land.

Deforestation has affected the livelihood of peasants as the forests were everything to them, their home, food, source of materials, without it they become food insecure. Besides, clearing the land for farming definitely brings about climate change which affects nature's equilibrium to sustain life, both for fauna and flora. It may give rise to unforeseen pests and diseases which affect both animals and crops.

Investors had stated that a wide range of agricultural chemicals are used to combat pests and diseases, and some become water pollutants through use, misuse, or ignorance.

The effect on the loss of bio-diversity due to large scale farming by clearing the forest is largely undermined. Due to clearing the land for farming valuable species of wild animals and plants are lost forever from the region.

Causes of Environmental Damages

a) Undefined authority of land administration: Constitutionally, Article 52 (d) of FDRE, states that the state is given with the power to administer land and other natural resources in accordance with federal laws. Hence, legally, Gambella Regional State is responsible for managing the land and

other natural resource of the region. But, it seems Gambella Regional State has forfeited this authority to Federal Government. Hence, the region is mandated to allocate only less than 5000 hectare of land to investors, while the land constituting beyond that size could only be processed by Federal Government. Hence, this undefined power between the federal and regional governments led to the confusion of who would be responsible to manage the impact of commercial farming on environment and on other aspects.

- b) Myths of Free Land:** Worldwide, the areas designated for large-scale investment are being portrayed as ‘empty’, ‘marginal’, ‘idle’ or ‘degraded’ land, largely unpopulated, unused, unproductive, and unlikely to compete with local food production (TNI, 2012:4). Accordingly, all federal and regional officials stated that the land area allotted to all investors was a land which has not been utilized by anybody for a long time. Moreover, investors also believed and consider that the land was never belonged to anybody, and it was unused for production.

The purpose of promotion of investment all over the country is four fold: to achieve food security, to make use idle land for production, to create employment opportunity, and to attract Foreign Direct Investment. However, the dominating myth in promoting investment in Gambella Regional State is the "myth of idle land". But the reality is that pastoralists shift from place to place and graze their animals, as such, there is no empty, idle, or unused land among pastoral and semi-pastoral communities.

- c) Absence of Framework and Code of Conduct:** Generally, there are no laws, regulations or directives that oblige benefit-sharing between the investor and the public (Tamrat 2010: 16). For

instance, in Oromia, any investor is obliged to plant native tree species in at least 2% of the project land, whereas the federal contracts do not impose such obligations but require projects to ‘conserve tree plantations that have not been cleared for earth works’ (Genet, 2012). But, in Gambella Regional State there is no well framed code of conduct for investors or a framework guiding the broader large scale commercial farming with regard to environmental protection.

- d) Investors profile:** According to GIA's official report of 2013, out of 960 investors investing in Gambella region 424 of them have been leasedland for agricultural investment in six woredas , out of which 12 of them were foreign investors and the remaining 380 were local investors. In addition to the land area provided by regional office, EAIAA has provided 308,015 hectare of land for a total of 45 investors, out of which 19 were foreign investors. Thus, the number of local investors who acquired land in the region was greater than the number of foreign investors. But, in terms of capital invested and land area taken in hectare, foreign investors had larger share than the local investors. Among the foreign investors, Indian investors take the major portion. When it comes to local investors, Sindayigaya (2012) had stated that in developing countries domestic investors and elite governing bodies are claimed to be the major land grabbers. And also backing this argument, Tinyade (2012) had also stated that governments and their elites are active land grabbers of such land themselves and government elites may have stakes in the "investment project".
- e) Absence of Communal Participation;** Article 43 (2) of Ethiopian constitution under the title “the right to development” states that

“...*Nationals have the right to participate in national development and, in particular, to be consulted with respect to policies and projects affecting their community...*” Therefore, based upon Ethiopian constitution and other scientific approaches, peoples’ participation in development project or program which affects their life is very important. But, the data gathered from the local people stated that they had no clue about the process of land allocation, and they were always surprised and strangers when new projects start operation within their locality. Moreover, the regional officials stated that the absence of participation was not only for local residents around the project area, but also for regional administrative bodies. Thus, absence of participation of local communities in the process of land allocation for agricultural investment aggravate enmity towards commercial farming in the region and had resulted in the absence of commitment to manage the impacts of the investments on environmental sustainability of the region.

Conclusion

Large scale commercial farming has been encouraged in the country, especially, after the 2007/08 and 2008/9 of food and oil crisis, respectively, in the world. . The rush for global free and farmable land also made Ethiopia one of the targets of local and international investors. As a result large scale of land has been leased out to investors, especially in Gambella Regional State. Hence, the study articulated that, in most cases, development of large scale commercial farming has drastically contributed to climate change, deforestation, pollution, and soil degradation, reduction in biodiversity and food insecurity. Hence,for a country like Ethiopia where food insecurity is a big problem throughout the year,involvement in large scale commercial farming is unavoidable. But it is mandatory, at least, to minimize the level

of negative impacts by developing a framework whereby concerned government bodies produce enforceable guideline and code of conduct with regard to protection of the environment in the establishment of large scale commercial farming.

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