



**ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK (ESMF)
FOR
RURAL ACCESS AND AGRICULTURAL MARKETING
PROJECT (RAAMP)
IN
ANAMBRA, BENUE, BORNO, CROSS RIVER, GOMBE AND TARABA
STATES**

**BY
FEDERAL MINISTRY OF AGRICULTURE AND RURAL
DEVELOPMENT (FMARD) FEDERAL PROJECT MANAGEMENT
UNIT (FPMU) RURAL ACCESS AND AGRICULTURAL
MARKETING PROJECT (RAAMP)**

FINAL REPORT

SEPTEMBER 30 2019

Prepared by



**Suite DC5, Apo Sparklight Mall, Durumi Abuja
+234-8068974351
www.ecosphereconsult.com
ecosphereconsultingltd@gmail.com**

DOCUMENT VERSION CONTROL

Version No	Version Status	Date	Author	Submitted to
0	DRAFT for review and comments	18 September 2019	Ecosphere Consulting	Federal Project Management Unit, Rural Access and Marketing Programme.
0.1	DRAFT for review and comments	29 September 2019	Ecosphere Consulting	
1	FINAL	30 September 2019	Ecosphere Consulting	

TABLE OF CONTENTS

DOCUMENT VERSION CONTROL	II
LIST OF TABLES.....	6
LIST OF FIGURES.....	7
LIST OF PLATES.....	7
ACRONYMS AND ABBREVIATIONS	8
GLOSSARY OF TERMS	10
EXECUTIVE SUMMARY	12
ROLES AND RESPONSIBILITIES FOR MANAGING E&S REQUIREMENTS	ERREUR ! SIGNET NON DEFINI.
CHAPTER ONE: INTRODUCTION	1
1.1 BACKGROUND INFORMATION	1
1.2 RATIONALE FOR THE ESMF	3
1.3 OBJECTIVES OF ESMF	3
CHAPTER TWO: REGULATORY AND INSTITUTIONAL FRAMEWORK	5
2.1 INTRODUCTION	5
2.2 NATIONAL ENVIRONMENTAL & SOCIAL POLICIES AND LEGAL PROVISIONS RELATED TO ENVIRONMENTAL MANAGEMENT	5
2.2.1 National Policy on the Environment (1988)	5
2.2.2 EIA Act Cap E12 LFN 2004	5
2.2.3 National Environmental Standards and Regulations Enforcement Agency (NESREA) Act 2007	6
2.2.4 National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations, 1991.....	6
2.2.5 National Environmental (Sanitation and Wastes Control) Regulations, 2009	7
2.2.6 National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes) Regulations, 1991.....	7
2.2.8 National Environmental (Noise Standards and Control) Regulations, 2009	7
2.2.9 National Environmental (Surface & Groundwater Quality Control) Regulations 2011.....	8
2.2.10 EIA Sectoral Guidelines for Infrastructure – Transportation Development Project (Roads and Highways) 1995.....	8
2.2.11 National Environmental (Construction Sector) Regulations, 2011. (S.I No. 19)	8
2.2.12 National Environmental (Wetlands, River Banks and Lake Shores) Regulations, 2009. (S.I No. 26)	9
2.2.13 Other Applicable National E&S Legal Provisions.....	9
2.2.14 The State Legislations.....	10
2.3 TRANSPORT SECTOR POLICIES AND LEGAL PROVISIONS	11
2.3.1 National Road Traffic Regulations, 2012	11
2.3.2 Nigerian Highway Code (2016)	11
2.4 THE GENDER POLICY FRAMEWORK IN NIGERIA.....	11
2.4.1 National Gender Policy, 2006.....	12
2.5 NIGERIAN INSTITUTIONAL PROVISIONS AND ARRANGEMENT	12
2.5.1 Federal Ministry of Environment.....	12
2.5.2 National Environmental Standards and Regulations Enforcement Agency (NESREA)	13
2.5.3 Ministry of Agriculture and Rural Development	13
2.6 NATIONAL ENVIRONMENTAL & SOCIAL POLICIES AND LEGAL PROVISIONS RELATED RESETTLEMENT	13
2.6.1 Introduction	13
2.6.2 Land Use Act – 1978.....	14
2.6.3 Overview of the Land Take process in Nigeria	16
2.6.4 LEGAL MECHANISMS FOR RESOLVING LAND-RELATED GRIEVANCES	18
2.6.4.1 The Constitution	18

2.7	TRADITIONAL LAND TENURE IN NIGERIA	19
2.7.1	<i>Certificates of Occupancy</i>	20
2.8	INSTITUTIONAL FRAMEWORK	20
2.8.1	<i>Federal Government</i>	21
2.8.2	<i>State Government</i>	21
2.8.3	<i>Local Government</i>	21
2.8.4	<i>Traditional Leadership</i>	22
2.8.5	<i>International Standards and Guidelines related to Involuntary Displacement</i>	23
2.8.6	<i>The African Development Bank Group's (AfDB) Integrated Safeguard System (ISS)</i>	23
2.9	INTERNATIONAL CONVENTIONS AND AGREEMENTS APPLICABLE TO THE SECTOR	24
2.10	THE AFRICAN DEVELOPMENT BANK (AfDB).....	24
2.10.1	<i>The African Development Bank (AfDB) Integrated Safeguards System (ISS)</i>	25
2.10.2	<i>The Integrated Safeguards Policy Statement</i>	25
2.10.3	<i>Operational Safeguards (OSs)</i>	26
2.10.4	<i>Environmental and Social Assessment Procedures (ESAPs)</i>	27
2.10.5	<i>Integrated Environmental and Social Impact Assessment (IESIA) Guidance Notes</i>	29
2.10.6	<i>AfDB Project Categorization Process</i>	30
2.11	E&S ASSESSMENT OF NIGERIAN POLICIES AND LEGISLATIONS AND AfDB SAFEGUARD SYSTEMS	31
2.12	DISCLOSURE REQUIREMENTS	35
	CHAPTER THREE: PROJECT DESCRIPTION	36
3.1	INTRODUCTION	36
3.2	PROJECT OVERVIEW.....	36
	<i>Component 1: Rehabilitation/Upgrading of Rural Infrastructure</i>	37
3.4	PROJECT PHASES AND ACTIVITY SEQUENCE.....	47
	CHAPTER FOUR: ENVIRONMENTAL AND SOCIAL BASELINE INFORMATION.....	48
4.1	INTRODUCTION	48
4.2	BIO-PHYSICAL ENVIRONMENT.....	48
4.2.1	<i>Location</i>	48
4.2.2	<i>Climate</i>	49
4.2.3	<i>Air Quality and Noise</i>	51
4.2.4	<i>Geology and Soils</i>	52
4.2.5	<i>Vegetation</i>	55
4.3	SOCIAL ENVIRONMENT	57
4.3.1	<i>Land Use Pattern, Agricultural Production and Livelihoods</i>	61
4.3.2	<i>Employment, Economy and Poverty</i>	61
4.3.3.1	<i>ACCESS TO HEALTH SERVICES IN NIGERIA</i>	63
	CHAPTER FIVE: POTENTIAL ENVIRONMENTAL & SOCIAL IMPACTS AND MITIGATION	64
5.1	OVERALL CONTEXT	64
5.2	POSITIVE IMPACTS	64
5.2.1	<i>Environmental Impacts</i>	64
5.2.2	<i>Positive Social Impacts</i>	65
5.3	NEGATIVE E&S IMPACTS AND MITIGATION MEASURES	65
	CHAPTER SIX: ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES AND REQUIREMENTS.....	71
6.1	ENVIRONMENTAL, HEALTH AND SAFETY GUIDELINES TO BE IMPLEMENTED BY THE RAAMP.....	71
6.2	ENVIRONMENTAL AND SOCIAL ASSESSMENT PROCEDURE.....	72
6.3	ENVIRONMENTAL AND SOCIAL MANAGEMENT FOR THE PROGRAM	76
6.3.1	<i>Environmental and Social Impact Assessment (ESIA) Studies</i>	76
6.3.2	<i>Environmental and Social Management Plans (ESMP)</i>	80
	CHAPTER SEVEN: APPROACHES TO BE ADOPTED RELATING TO INVOLUNTARY RESETTLEMENT	
	7.1 INTRODUCTION	82
7.2	BENCHMARKING OF RELEVANT NIGERIAN LEGISLATION AND THE AfDB'S OS2.....	82
7.3	COMPENSATION FRAMEWORK	88

7.3.1	Compensation Principles	88
7.3.2	Eligibility Principles	92
7.3.3	Establishment of Entitlement Cut-off Date.....	92
7.3.4	Entitlements	93
7.3.5	Entitlement Planning	99
7.3.6	Method of Compensation	99
7.3.7	Entitlement for Compensation.....	99
7.3.8	Valuation.....	100
7.4	METHOD OF VALUATION	100
7.5	ARRANGEMENTS FOR COMPENSATION.....	102
7.5.1	Public Participation	102
7.5.2	Notification	102
7.5.3	Documentation of Holdings and Assets.....	103
7.5.4	Agreement on Compensation and Preparation of Contracts.....	103
7.5.5	Compensation Payments	103
7.5.6	Community Compensation Payments.....	103
7.5.7	Procedures for Delivery of Compensation.....	104
7.6	MONITORING AND EVALUATION	104
7.6.1	Monitoring Process	104
7.6.2	Livelihood Restoration.....	104
7.7	OUTLINE OF A RESETTLEMENT ACTION PLAN (RAP)	106
	CHAPTER EIGHT: STAKEHOLDER ENGAGEMENT AND GRIEVANCE MANAGEMENT	110
8.1	STAKEHOLDERS' CONSULTATION AND ENGAGEMENT	110
8.2	CONSULTATIONS RELATED TO INVOLUNTARY DISPLACEMENT	111
8.3	PROGRAM GRIEVANCE REDRESS MECHANISM (GRM)	113
8.4	APPOINTING MEMBERS OF GRIEVANCE REDRESS COMMITTEES (GRC)	115
8.5	PROCEDURES, COMPLAINTS CHANNELS AND TIME FRAME FOR GRIEVANCE REDRESS MECHANISMS.....	116
8.6	STAKEHOLDER ENGAGEMENT ACTIVITIES DURING THE PREPARATION OF THE ESMF.....	118
8.6.1	Stakeholders Consulted.....	118
	CHAPTER NINE: ESMF IMPLEMENTATION AND MANAGEMENT	133
9.1	ROLES AND RESPONSIBILITIES FOR MANAGING E&S REQUIREMENTS	133
9.1.1	RAAMP National Project Management Office's Role and Responsibilities	133
9.1.2	AfDB's Role and Responsibilities	133
9.2	INSTITUTIONAL ARRANGEMENTS FOR THE IMPLEMENTATION OF THE ESMF	133
9.2.1	Roles and responsibilities of Main Implementing Entity.....	133
9.3	TRAINING AND CAPACITY STRENGTHENING PLAN	136
9.4	ESMP AND RAP IMPLEMENTATION MONITORING AND REPORTING.....	139
	ENVIRONMENTAL AND SOCIAL MONITORING	140
	REFERENCES.....	142
	APPENDIX 1A. E&S SCREENING FORM.....	143
	APPENDIX 2: ATTENDANCE SHEETS FOR CONSULTATIONS.....	145

LIST OF TABLES

TABLE 2.1. OTHER RELEVANT NATIONAL E&S LAWS AND REGULATIONS	9
TABLE 2.2. SELECTED INTERNATIONAL AGREEMENTS AND CONVENTIONS TO WHICH NIGERIA IS A SIGNATORY	24
TABLE 2.3. AFDB OPERATIONAL SAFEGUARDS OS1-5.....	27
TABLE 2.4. SUMMARY OF THE AFDB PROJECT CYCLE AND E & S REQUIREMENTS	28
TABLE 2.5. AFDB PROJECT CATEGORIZATION PROCESS	31
TABLE 2.6. BENCHMARKING OF NIGERIAN LEGAL PROVISIONS AND AFDB ISS SPECIFICATIONS.....	32
TABLE 2.7. DISCLOSURE REQUIREMENTS OF THE FMENV AND AFDB	35
TABLE 3.1. LIST OF ELIGIBLE ROADS IN TARABA STATE.....	39
TABLE 3.2. LIST OF ELIGIBLE ROADS IN CROSS RIVER STATE	40
TABLE 3.3. LIST OF ELIGIBLE ROADS IN ANAMBRA	41
TABLE 3.4. LIST OF ELIGIBLE ROADS IN BORNO STATE.....	44
TABLE 3.5. LIST OF ELIGIBLE ROADS IN BENUE STATE.....	45
TABLE 4.1. LOCATION OF RAAMP STATES	48
TABLE 4.2. CLIMATE OF RAAMP STATES.....	49
TABLE 4.3. RESULT OF AIR QUALITY AND NOISE LEVEL ASSESSMENT	51
TABLE 4.4. GEOLOGY AND SOILS OF RAAMP STATES.....	52
TABLE 4.5. VEGETATION OF THE PROJECT AREAS.....	56
TABLE 4.6. SOCIOECONOMIC DATA OF THE PARTICIPATING STATES	58
TABLE 5.1. POTENTIAL E&S IMPACTS OF PROJECTS UNDER RAAMP (NON-EXHAUSTIVE) AND MITIGATION MEASURES	66
TABLE 6.1. SUMMARY OF WBG GENERAL EHS GUIDELINES.....	71
TABLE 6.2. AFDB E & S PROCESS FOR CATEGORY 1 AND 2 PROJECTS.....	74
TABLE 7.1. BENCHMARKING OF NIGERIAN LAW AND PRINCIPLES OF THE AFDB ON INVOLUNTARY DISPLACEMENT	84
TABLE 7.2. CATEGORIES OF PAPS AND COMPENSATION ACCORDING TO NIGERIA GUIDELINE AND AFDB REQUIREMENTS	89
TABLE 7.3. ELIGIBILITY CRITERIA FOR COMPENSATION	92
TABLE 7.4. EXAMPLE OF AN ENTITLEMENT MATRIX THAT COULD BE APPLIED IN SUB PROJECTS	94
TABLE 7.5. INDICATIVE VALUATION METHODS	101
TABLE 7.6. OUTLINE OF A RAP.....	107
TABLE 8.1. AFDB GRIEVANCE REDRESS MECHANISM APPROACH.....	113
TABLE 8.2. CATEGORIES OF STAKEHOLDERS CONSULTED DURING THE PREPARATION OF THE ESMF...	119
TABLE 8.3. STAKEHOLDERS CONSULTED IN EACH STATE DURING THE PREPARATION OF THE ESMF	120
TABLE 8.4. SUMMARY OF STAKEHOLDERS CONSULTATION IN ANAMBRA STATE.....	121
TABLE 8.5. SUMMARY OF STAKEHOLDERS CONSULTATION IN BENUE STATE.....	123
TABLE 8.6. SUMMARY OF STAKEHOLDERS CONSULTATION IN BORNO STATE.....	125
TABLE 8.7. SUMMARY OF STAKEHOLDERS CONSULTATION IN CROSS RIVER STATE	126
TABLE 8.8. SUMMARY OF STAKEHOLDERS CONSULTATION IN TARABA STATE.....	127
TABLE 8.9. SUMMARY OF STAKEHOLDERS CONSULTATION IN GOMBE STATE	129
TABLE 9.1. ROLES AND RESPONSIBILITIES OF THE MAIN IMPLEMENTING ENTITIES.....	134
TABLE 9.2. PROPOSED TRAINING PROGRAMS FOR ESMF IMPLEMENTATION	137
TABLE 9.3. ESMP AND RAP IMPLEMENTATION AND REPORTING INSTRUMENTS	139

LIST OF FIGURES

FIGURE 2.1: STRUCTURE OF THE AFDB ISS.....	25
FIGURE 3.1: MAP OF NIGERIA SHOWING THE LOCATIONS RAAMP PROJECT COMPONENTS	ERREUR ! SIGNET NON DEFINI.
FIGURE 4.1: GEOLOGICAL MAP OF NIGERIA	55
FIGURE 4.2: VEGETATION MAP OF NIGERIA	56
FIGURE 6.1. ESAP PROCESS	73

LIST OF PLATES

PLATE 4.1: AIR QUALITY AND NOISE LEVEL ASSESSMENT ALONG ROAD CORRIDORS (NYAHASANG, CROSS-RIVER AND IHUEZE, ANAMBRA STATES RESPECTIVELY).	51
PLATE 8.1: CONSULTATION WITH SPIU AND STAKEHOLDERS IN TARABA STATE	130
PLATE 8.2: GROUP PHOTOGRAPH WITH SPIU AND STAKEHOLDERS IN TARABA STATE	130
PLATE 8.3: ENGAGEMENT WITH THE SPIU IN CROSS-RIVER STATE	130
PLATE 8.4: GROUP PHOTOGRAPH WITH THE SPIU IN CROSS-RIVER STATE	130
PLATE 8.5: ENGAGEMENT WITH PAPS ALONG SWAMP ROAD IN CROSS-RIVER STATE	130
PLATE 8.6: ENGAGEMENT WITH PAPS BY FADAMA MARKET ALONG SWAMP ROAD IN CROSS-RIVER STATE.....	130
PLATE 8.7: ENGAGEMENT WITH PAPS ALONG SWAMP ROAD BY FADAMA MARKET IN CROSS-RIVER STATE.....	131
PLATE 8.8: ABANDONED FADAMA MARKET DUE TO FAILED ACCESS ROAD	131
PLATE 8.9: FAILED PORTION ALONG SWAMP ROAD SHOWING BUILDING FENCE THAT MAY BE AFFECTED BY CONSTRUCTION	131
PLATE 8.10: NARROW PORTION ALONG SWAMP ROAD SHOWING ECONOMIC TREES THAT MAY BE AFFECTED BY CONSTRUCTION.....	131
PLATE 8.11: ENGAGEMENT WITH SPIU AND OTHER STAKEHOLDERS IN BENUE STATE	131
PLATE 8.12: GROUP PHOTOGRAPH WITH THE SPIU, BENUE STATE	131
PLATE 8.13: CONSULTATION WITH SPIU AND OTHER STAKEHOLDERS IN ANAMBRA STATE.....	131
PLATE 8.14: GROUP PHOTOGRAPH WITH SPIU AND OTHER STAKEHOLDERS IN ANAMBRA STATE.....	131
PLATE 8.15: ENGAGEMENT WITH A RICE FARMER AT IHUEZE COMMUNITY IN ANAMBRA STATE.....	132
PLATE 8.16: ENGAGEMENT WITH A CASSAVA FARMER AT IHUEZE COMMUNITY IN ANAMBRA STATE	132
PLATE 8.17: FAILED PORTION ALONG NDIOWU - ANUMKPU – IHUEZE ROAD SHOWING SOME EROSION CONTROL PALIATIVE MEASURE BY RURAL COMMUNITIES.....	132
PLATE 8.18: VEHICLES EXPERIENCING DIFFICULTY IN NAVIGATING FAILED PORTION ALONG NDIOWU - ANUMKPU – IHUEZE ROAD IN ORUMBA LGA, ANAMBRA STATE	132

ACRONYMS AND ABBREVIATIONS

AFD	Agence Francaise de Development
AfDB	African Development Bank
ARAP	Abbreviated Resettlement Action Plan
BCS	Broad Community Support
C-ESMP	contractor's Environmental and Social Management Plan
CITIES	International Trade in Endangered Species of Fauna and Flora
CLO	Community Liaison Officer
CRMU	Compliance and Review Mechanism Unit
CSO	Civil Society Organization
CSP	Country Strategy Paper
E&S	Environmental and Social
EAR	Environmental Audit Report
EHS	Environment Health and Safety
EIA	Environmental Impact Assessment
ESA	Environmental and Social Assessment
ESAPs	AfDB Environmental and Social Assessment Procedures
ESCON	Environmental and Social Compliance Note
ESCR	Environmental and Social Completion Report
ESDD	Environmental and Social Due Diligence
ESFR	Environmental and Social Final Report
ESIA	Environmental and Social Impact Assessment
ESIS	Environmental and Social Impact Studies
ESMF	Environmental and Social Management Framework
ESMR	Environmental and Social Monitoring Report
ESMoFo	Environmental and Social Monitoring Form
ESMP	Environmental and Social Management Plan
ESS	Environmental Safeguard Specialist
ESSF	Environmental and Social Screening Form
FEPA	Federal Environmental Protection Agency
FDRD	Federal Department of Rural Development
FGN	Federal Government of Nigeria
FI	Financial Intermediary
FMARD	Federal Ministry of Agriculture and Rural Development
FMenV	Federal Ministry of Environment
FPIC	Free, Prior, Informed and Consented
FRAP	Full Resettlement Action Plan
FRSC	Federal Road Safety Corps
GDP	Gross Domestic Products
GECL	General Counsel and Legal Services Department
GHGs	Green House Gases
GoN	Government of Nigeria
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GWD	Guinea worm disease
HIV-AIDS	Human Immunodeficiency Virus-Acquired Immune Deficiency Syndrome
IDEV	Operations Evaluation Department
IEE	Initial Environmental Evaluation
IESIA	Integrated Environmental and Social Impact Assessment
IFC	International Finance Corporation
IRM	Independent Review Mechanism
ISS	Integrated Safeguards System
ISTS	Integrated Safeguards Tracking System
IUCN	International Union for the Conservation of Nature
KM	Kilometer
LFN	Laws of the Federation of Nigeria

LGA	Local Government Area
LRS	Livelihood Restoration Strategy
LRP	Livelihood Restoration Plan
M&E	Monitoring and Evaluation
MDA	Ministries, Departments and Agencies
MDB	Multilateral Development Bank
MSA	Multi-Sectoral Actions
NBS	Nigerian Bureau of statistics
NCD	Non-Communicable Diseases
NEEDS	National Economic Empowerment and Development Strategies
NESREA	National Environmental Standards & Regulations Enforcement Agency
NGO	Non-Governmental Organisation
NNLTS	Northern Nigeria Land Tenure System
NTD	Neglected Tropical Diseases
OS	Operational Safeguard
PACs	Project Affected Communities
PAP	Project Affected Persons
PAR	Project Appraisal Report
PCN	Project Concept Note
PCR	Project Completion Report
PIM	Project Implementation Manual
PIU	Project Implementation Unit
RAAMP	Rural Access and Agricultural Marketing Project
RAMP	Rural Access and Mobility Project
RAP	Resettlement Action Plan
RCM	Request for Categorization Memorandum
RISP	Regional Integration Strategy Paper
RMC	Regional Member Country
ROW	Right of Way
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SNLTS	Southern Nigeria Land Tenure System
SNSC	Safeguards and Compliance Department
SPIU	State Project Implementation Unit
SSS	Social Safeguard Specialist
STIs	Sexually Transmitted Infections
TOR	Terms of Reference
UN	United Nations
UNFCC	United Nations Framework Convention on Climate Change
VOC	Volatile Organic Compounds
WBG	World Bank Group
WHO	World Health Organization
WMP	Waste Management Plan

GLOSSARY OF TERMS

Children: all persons under the age of 18 years according to international regulatory standard (convention on the rights of Child 2002).

Community: a group of individuals broader than households, who identify themselves as a common unit due to recognized social, religious, economic and traditional government ties or shared locality.

Compensation: payment in cash or in kind for an asset or resource acquired or affected by the project.

Cut-off-Date: the date on and beyond which any person who occupies land or assets, or constructs assets on land, required for project use, will not be eligible for compensation. The date is often the day when assessment of persons and their property in the project area commences.

Economic Displacement: a loss of productive assets or usage rights or livelihood capacities because such assets / rights / capacities are located in the project area.

Entitlement: The compensation provided to a displaced person including: financial compensation; the right to participate in livelihood enhancement programs; housing sites and infrastructure; transport and temporary housing allowance; and, other short term provisions required to move from one site to another.

Female Headed Household: a household where a woman is the principal earning member of the family.

Head of the Household: a person in a household who is running the household and looking after his dependents

Household: a group of persons living together who share the same cooking and eating facilities and form a basic socio-economic and decision-making unit. One or more households often occupy a homestead.

Involuntary Resettlement: resettlement without the informed consent of the displaced persons or if they give their consent without having the power to refuse resettlement.

Lost Income Opportunities: refers to compensation to project affected persons for loss of business income, business hours/ time due to project.

Physical Displacement: a loss of residential structures and related non-residential structures and physical assets because such structures / assets are located in the project area.

Private property owners: persons who have legal title to structures, land or other assets and are accordingly entitled to compensation under the Land Act.

Project-Affected Community: a community that is affected by the project.

Project-Affected Household: all members of a household, whether related or not, operating as a single economic unit, who are affected by the project.

Project-Affected Person: any person who, as a result of the project, loses the right to own, use or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

Rehabilitation: the restoration of the PAPs resource capacity to continue with productive activities or lifestyles at a level higher or at least equal to that before the project.

Relocation: a compensation process through which physically displaced households are provided with a one-time lump-sum compensation payment for their existing residential structures and move from the area.

Replacement Cost: the amount of cash compensation and/or assistance suffices to replace lost assets and cover transaction costs, without taking into account depreciation or salvage value.

Resettlement Action Plan (RAP): Documented procedures and the actions a project proponent will take to mitigate adverse effects, compensate losses, and provide development benefits to persons and communities affected by a project.

Resettlement Assistance: support provided to people who are physically displaced by a project. This may include transportation, food, shelter, and social services that are provided to affected people during their resettlement. Assistance may also include cash allowances that compensate affected people for the inconvenience associated with resettlement and defray the expenses of a transition to a new locale, such as moving expenses and lost work days.

Resettlement: a compensation process through which physically displaced households are provided with replacement plots and residential structures at one of two designated resettlement villages in the district. Resettlement includes initiatives to restore and improve the living standards of those being resettled.

Squatters: squatters are landless household squatting within the public / private land for residential and business purposes.

Valuer: the valuer of property, land and the level of compensation for all the affected persons.

Vulnerable: people who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantages, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

EXECUTIVE SUMMARY

Introduction

The Federal Government of Nigeria has initiated the preparation of the Rural Access and Agricultural Marketing Project (RAAMP), the successor of the Rural Access and Mobility Project (RAMP). The project is being financed by the World Bank, the African Development Bank (AfDB) and the Agence Francaise de Developpment (AFD). The World Bank and AFD are supporting 13 states namely: Abia, Akwa-Ibom, Bauchi, Kano, Katsina, Kebbi, Kogi, Kwara, Ogun, Ondo, Oyo, Plateau and Sokoto while AfDB will support 6 States including Benue, Borno, Anambra, Cross River, Gombe and Taraba.

The development objective of the proposed Rural Access and Agricultural Marketing Project (RAAMP) is to improve rural access and agricultural marketing in selected participating states while strengthening the financing and institutional base for sustainable management of the rural and state roads network.

Project Justification

The Nigeria road network is relatively dense consisting of about 194,000 km of roads. This includes 34,000 km of federal roads, 30,000 km of state roads and 130,000 km of registered rural roads. The road density is about 0.21 km of roads per square kilometre. In spite of the relatively high road density, the rural accessibility index for Nigeria (defined as the proportion of the rural population living within 2 kilometres away from an all-weather road) is low, at only 25.5 percent, leaving about 92 million rural dwellers unconnected. Rural access also improves the agro economic potentials and support food security as more products will get to the market before they become bad. These considerations demand the expansion and improvement of rural road network, and, also, conservation of rural road/transport assets.

The overall goal for the Rural Access and Agricultural Marketing Project (RAAMP) is for employment generation, improve the competitiveness of commodity value chains, and increase incomes of the commodity value chain actors through improved rural road infrastructure, agricultural processing and marketing systems. Furthermore, an improved rural access will enhance the agricultural potentials and marketing opportunities for the agrarian rural communities in Nigeria and, by extension, help in the improvement of livelihoods of the rural population.

Project Overview and Description

The development objective of the proposed Rural Access and Agricultural Marketing Project (RAAMP) is to improve rural access and agricultural marketing in selected participating states while strengthening the financing and institutional base for sustainable management of the rural and state roads network. The RAAMP program includes a number of components with sub components as set out in Table A.

Table A. RAAMP components and subcomponents

Component	Sub component	
Component 1: Rehabilitation/Upgrading of Rural Infrastructure	Subcomponent 1.1 – Rehabilitation/Upgrading of Access Roads and River Crossings:	A total of 278 No of roads are currently being considered for inclusion in the RAAMP program. These includes: Taraba State 22 roads with a total of 500km, Cross River State 26 roads with a total of 238km, Anambra state 124 roads with a total of 723km, Borno state 34 roads with a total of 516.1km, Benue 23 roads with a total of 362.9km and Gombe state with 49 roads having a total of 779.84km
	Subcomponent 1.2 - Rehabilitation/Upgrading of Markets and Processing Facilities	
Component 2: Capacity Building for Value Chain Actors	n/a	
Component 3: Project Management and Coordination	n/a	

A prioritization program will be undertaken by each State to select the roads that will be considered under the program. Once these roads have been selected, appropriate environmental and social studies will be prepared in line with existing country systems.

Project Location

The project states are distributed across the major zones in Nigeria with 3 of the states located in the North, 2 in the South and 1 in the middle belt. The locations of the benefiting states are briefly described in Figure A.

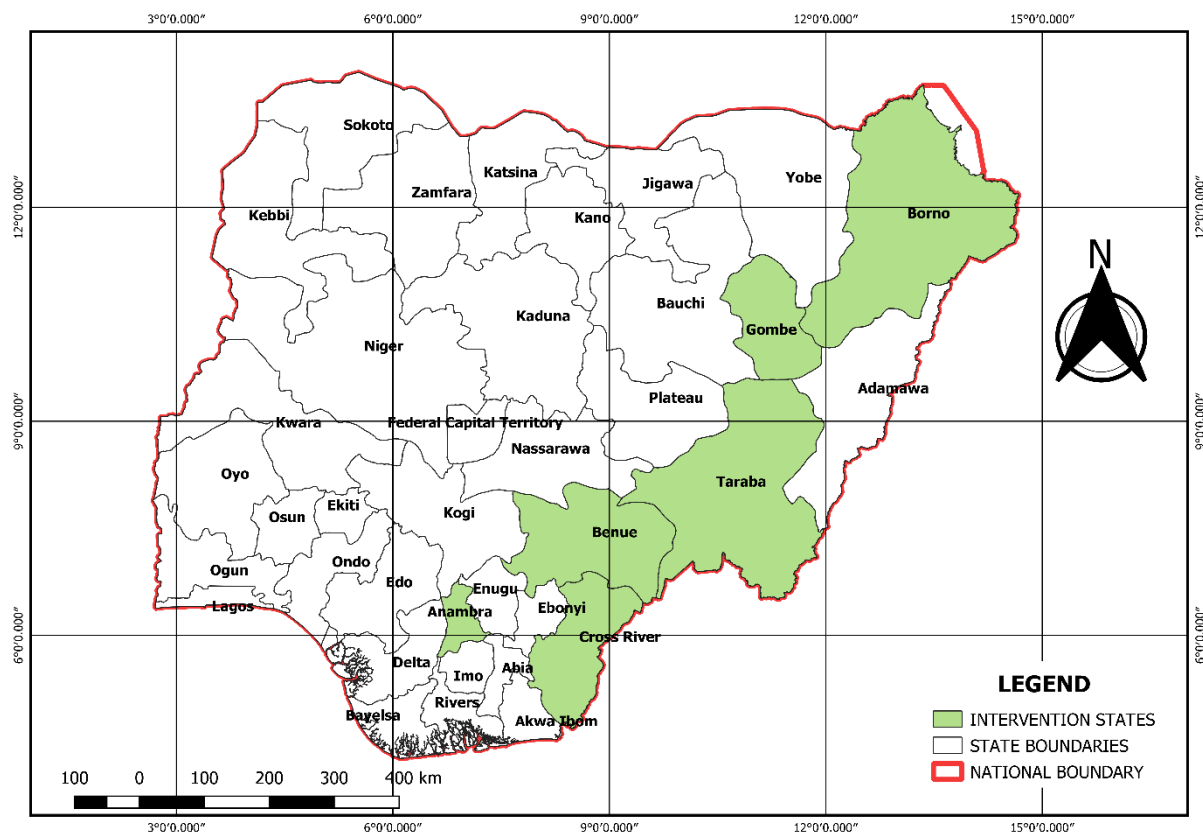


Figure A: Map of Nigeria showing the intervention states

Objectives of the ESMF

In order to manage potential environmental and social impacts related to the subprojects within the RAAMP program, an ESMF has been developed. The objectives of this ESMF are:

- To establish clear procedures and methodologies for the environmental and social planning, review, approval, and implementation of sub-projects-to be financed under RAAMP;
- To provide information about scope of adverse E&S risks and impacts expected during sub-project planning, construction and operation;

describe the approach to mitigation and monitoring actions to be taken; and cost implications;

- To provide guidance on how to deal with issues relating to land acquisition, compensation and resettlement during the implementation of sub projects within the RAAMP. This will ensure that displaced and resettled persons are compensated for their loss at replacement cost, given opportunities to share in project created benefits, and assisted with the move and during the transition period at the resettlement sites or locations as applicable.
- To provide guidance to stakeholders participating in the mitigation of adverse social impacts of the project, including rehabilitation/resettlement operations, in order to ensure that project affected persons (PAPs) will not be impoverished by the adverse social impacts of the projects within the RAAMP.
- To specify appropriate roles and responsibilities and outline the necessary reporting procedures for managing and monitoring E&S concerns related to sub-projects;
- To provide practical resources for implementing the ESMF, including general guidance on the development of sub-project specific Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plan (ESMP) and their implementation, Resettlement Action Plans (RAPs) and their implementation.

Institutional Framework, Laws and Regulations

Institutional framework, Laws and regulations/procedures that RAAMP will comply with includes the Country System starting from the EIA Act CAP 12 LFN, 2004 as amended, the Integrated Safeguard Systems of the African Development Bank, and other regulations put in place to complement the EIA act in Nigeria. Some of the laws and regulations are:

- EIA Act Cap E12 LFN 2004
- National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations, 1991
- National Environmental (Sanitation and Wastes Control) Regulations, 2009
- National Environmental (Noise Standards and Control) Regulations, 2009
- National Environmental (Surface & Groundwater Quality Control) Regulations 2011
- Harmful Wastes (Special Criminal Provisions etc.) Act CAP HI LFN 2004.
- Guidelines and Standards for Environmental Pollution Control in Nigeria, 1991
- National Environmental Protection (Effluent Limitation) Régulations, 1991
- Land Use Act CAP L5 LFN 2004
- Public Health Law Cap 103 LFN 1990
- Employee's Compensation Act, 2010

International Policies and Guidelines relevant to this intervention are that of the African Development Bank (AfDB) through the Integrated Safeguards System (ISS), The Integrated Safeguards Policy Statement and the Operational Safeguards (OSs). The Operational safeguards are presented in Table B

Table B: Operational Safeguards of the AfDB

Operational Safeguard	Description
OS 1: Environmental and social assessment	This overarching safeguard governs the process of determining a project's environmental and social category and the resulting environmental and social assessment requirements
OS 2: Involuntary Resettlement: Land Acquisition, Population Displacement and Compensation	This safeguard consolidates the policy commitments and requirements set out in the Bank's policy on involuntary resettlement and incorporates a few refinements designed to improve the operational effectiveness of those requirements. It includes comprehensive notions of livelihood and assets, accounting for their social, cultural, and economic dimensions. It also adopts a definition of community and common property that emphasizes the need to maintain social cohesion, community structures, and the social interlinkages that common property provides. It furthermore stresses the importance of improving living conditions for PAPs through a Livelihood Restoration programme.

OS 3: Biodiversity and Ecosystem Services	This safeguard aims to conserve biological diversity and promote the sustainable use of natural resources. It also translates the commitments in the Bank's policy on integrated water resources management into operational requirements.
OS 4: Pollution Prevention and Control, Greenhouse Gases, Hazardous Materials and Resource Efficiency	This safeguard covers the range of key impacts of pollution, waste, and hazardous materials for which there are agreed international conventions, as well as comprehensive industry-specific and regional standards, including greenhouse gas accounting, that other multilateral development banks follow.
OS 5: Labour Conditions, Health and Safety	This safeguard establishes the Bank's requirements for its borrowers or clients concerning workers' conditions, rights and protection from abuse or exploitation. It also ensures greater harmonization with most other multilateral development banks.

Baseline Conditions

Environmental and social baseline condition of the participating states are discussed elaborately in chapter four of this ESMF, a summary of the socio economic baseline is presented here on Table C.

Table C: Summary of socio economic baseline for participating states

S/N	PARAMETER	Anambra	Benue	Borno	Cross River	Taraba	Gombe
1	Capital City	Awka	Makurdi	Maiduguri	Calabar	Jalingo	Gombe
2	Local Govt Areas	The 21 LGAs in Anambra State: Aguata, Anambra East, Anambra West, Aniocha, Awka North, Awka South, Ayamelum, Dunukofia, Ekwusigo, Idemili North, Idemili South, Ihiala, Njikoka, Nnewi North, Nnewi South, Ogbaru, Onitsha North, Onitsha South, Orumba North, Orumba South, Oyi.	The 23 LGAs in Benue State are Ado, Agatu, Apa, Buruku, Gboko. Guma, Gwer East, Gwer West, Katsina-Ala, Konshisha, Kwande Logo, Makurdi, Obi, Ogbadibo, Ohimini, Oju, Okpokwu, Otukpo, Tarka, Ukum, Ushongo, Vandeikya	Borno state has 27 local government area, they are; Abadam, Askira/Uba, Bama, Bayo, Biu, Chibok, Damboa, Dikwa, Gubio, Guzamala, Gwoza, Hawul, Jere, Kaga, Kala/Balge, Konduga, Kukawa, Kwaya Kusar, Mafa, Magumeri, Maiduguri, Marte, Mobbar,	There are 18 LGAs- Abi, Akampu, Akpabuyo, Bakassi, Bekwara, Biase, Boki, Calabar-Municipal, Calabar South, Etung, Ikom, Obanliku, Obubra, Obudu, Odukpani, Ogoja, Yakurr and Yala	The 18 LGAs in Benue State are: Ardo Kola, Bali, Donga, Gashaka, Gassol, Ibi, Jalingo, Karim Lamido, Kurmi, Lau, Sardauna, Takum, Ussa, Wukari, Yorro, Zing	11 LGAs: Akko, Balanga, Billiri, Dukku, Kaltungo, Kwami, Shomgom, Funakaye, Gombe, Nafada/Bajoga, Yamaltu Deba.

S/N	PARAMETER	Anambra	Benue	Borno	Cross River	Taraba	Gombe
				Monguno, Ngala, Nganzai, Shani			
3	Region in Nigeria	South East	North Central	North East	South South	North East	North East
4	Major Ethnic Group	Igbo	Tiv, Idoma and Iggede	Kanuri, Other ethnic groups such as Lamang, Babur/Bura and Marghi are also found in the southern part of the state	Efik, Ejagham, Yakurr, Bette, Yala, Iggede, Ukelle and the Bekwarra.	Major ethnic groups include Fulani, Mumuye, Jukun, Jenjo, Kuteb, Chamba and Mambilla etc	Gombe State is mainly populated by Fulani People constituting more than 50% of the population. Other minor ethnic groups include the Hausa, Bolewa, Tera, Tangale, Waja and Kanuri.
5	Main Native language	Igbo	Tiv, Idoma and Iggede	Kanuri, Hausa	Boki, Ejagham and Efik	Fulfude, Hausa, Mumuye, Jukun	Hausa is the commercial language

S/N	PARAMETER	Anambra	Benue	Borno	Cross River	Taraba	Gombe
							amidst the people
6	Population*	The total population is about 5,527,809 as at 2016	The state has a total population estimate of 5,571,815 as at 2016	The total population is estimated at 5,860,183 in 2016	The state has a total population estimate of 3,866,269 as at 2016	The total population is estimated at 3,066,834 in 2016	The state has a total population estimate of 3,472,223 as at 2016
7	Population by Gender	Male: 2,819,182 Female: 2,708,626	Male: 2,928,326 Female: 2,813,489	Male: 2,988,693 Female: 2,813,489	Male: 1,971,797 Female: 1,894,472	Male: 1,564,085 Female: 1,502,789	Male: 1,770,834 Female: 1,701,389
8	Population Density	862.5 persons/ km ²	124.9 persons/km ²	72.2 persons/km ²	143.5 persons/ km	42.1 persons/km ²	7,067 persons/km ²
9	Landmass	4,844 km ²	34,059 km ²	57,799 km ²	20,156 km ²	54,473 km ²	18,768km ²
10	Major Economic Activities	Major economics activities include agriculture, manufacturing and commerce. Agriculture dominates the rural economy. Agricultural activities include farming, livestock & forestry. The state has relatively high concentration of trade/commercial activities artisans and small manufacturing. The state's economic potential lies in its	Agriculture is the mainstay of the economy as it is practiced by over 75% of the people. The popularly grown crops includes; Sweet potatoes, cassava, soya beans, guinea corn, yams, rice, groundnut etc. The state also boasts of long stretch of river systems with great potential for viable fishing industry.	The major occupation of the people in the state is agriculture with crops like sorghum, millet, maize and groundnuts. Rearing of animals is also another form of agricultural practices by the people in the state. Small percentage of the people are	Tourism and Agriculture (including fishing) are the two major economic thrust of the State. Agriculture employs about 80 percent of the State's labour force and contributes about 40 percent to the Gross State Products (GSP). The Tourism infrastructure is well developed to international standard, like the Obudu Ranch Resort, Tinapa Business Resort, etc. which currently attracts	The major occupation of the people of Taraba State is agriculture. Cash crops produced in the state include coffee, tea, groundnuts and cotton. Crops such as maize, rice, sorghum, millet, cassava, and yam are also produced in commercial quantity. In addition, cattle, sheep and goats are reared in large numbers, especially on the Mambilla Plateau, and along the Benue and Taraba	The people of Gombe state (80%) are primarily farmers producing food and cash crops, which include Cereals: Maize, Soghum, Rice and wheats: Legumes: Cowpeas, groundnuts, soya beans and bambara nuts. Fruits: Orange, Lemon, Mango, Guava, Pawpaw and grapes. Vegetables:

S/N	PARAMETER	Anambra	Benue	Borno	Cross River	Taraba	Gombe
		industrial layouts in Onitsha and Nnewi.		traders and civil servants	several tourists to the State.	valleys. Similarly, the people undertake other livestock production activities like poultry production, rabbit breeding and pig farming in fairly large scale. Communities living on the banks of River Benue, River Taraba, River Donga and Ibi engage in fishing all year round.	Tomatoes, pepper, onions, okra, pumpkin and melon. Tree Crops: Gum Arabic, Kenaf, sugar cane, sunflower and ginger.
11	Major Cultural Resources	Agulu Crocodile Lake, Ogbunike Caves, Igbo Ukwu Museum, etc.	Gurgul water fall on Katsina –Ala River, Enumabia Warm Spring, Tombs of the first Dutch Missionaries etc.	The Lake Chad	Ikom Monoliths, the Mary Slessor Tomb, Calabar Drill Monkey Sanctuary, Cross River National Park, Afi Mountain walkway canopy, Kwa falls, Agbokim waterfalls, Tinapa Business Resort etc.	Mambilla Plateau Gembu, Barup Waterfalls, Marmara Crocodile Wukari etc.	The Emir's Palace, Bima Hill, Dadin Kowa Dam, Killang hill, Tula Battlefield, Bulok warm Spring, Kalam hill, The Cham Valley, Binga Ruins, Bage hills, Tula hideout caves, kanawa forest etc.
12	HIV/AIDs Prevalence 2016/2017	2.4% 5 th Position	4.9% 2 nd Position	1.3% 17 th Position	1.7% 12 th Position	2.7% 4 th Position	1.2% 20 th Position

Potential Environmental and Social Impacts, Mitigation Measures

Some of the major environmental and social risks in the project implementation includes; displacement of business and farming activities along the ROW and removal of economic trees and crops as well as drainage problems from the rural roads causing erosion to be diverted to people's farmlands.

An indicative impact and Mitigation measures are presented in Table D.

Table D: Sample of Impact and Mitigation Measures

Impact	Mitigation
Geology/Hydrogeology <ul style="list-style-type: none"> • Interruption of hydrogeology and groundwater flows from excavation and ground clearance. 	<ul style="list-style-type: none"> • Detailed alignment to take account of local groundwater conditions, e.g. by avoiding areas with springs or where the water table is shallow.
<ul style="list-style-type: none"> • Pollution of soil, surface and groundwater from discharges and accidental releases. 	<ul style="list-style-type: none"> • Ensure that all forms of discharges and accidental releases are prevented.
Soils, Run-off and Flooding <ul style="list-style-type: none"> • Loss of soil / sediments and pollution of watercourses, and interruption of drainage patterns, as a result of ground clearance and earthworks. 	<ul style="list-style-type: none"> • Minimization of cleared areas and soil disturbance, with revegetation as soon as feasible, with native species.
Release of hazardous substances during construction, or operation (e.g. vehicle spills) leading to soil, surface or groundwater contamination.	<ul style="list-style-type: none"> • Materials handling and control procedures.
Air Quality <ul style="list-style-type: none"> • Dust from construction, and other emissions during construction and operation, could affect human health, vegetation (including crops) and wildlife. 	<ul style="list-style-type: none"> • Sensitive local route selection and siting of construction facilities.
Workforce-Community Interactions <ul style="list-style-type: none"> • Real or perceived disruption to normal community life, through the physical presence of a construction workforce. 	<ul style="list-style-type: none"> • Adoption of a Stakeholder Engagement Plan, as a framework for early and ongoing community consultation • Implementation of a Grievance Procedure. • Works procedures, defining a Code of Appropriate Conduct for all workers.
Labour and Working Conditions <ul style="list-style-type: none"> • Poor management of occupational health and safety could lead to accidents, injuries and illnesses among workers; mental health issues may arise due to remote or enclosed living. • Differences in nationality, ethnicity, religion, etc. may lead to discrimination and harassment, and differences (perceived or real) in working conditions between workers may lead to resentments. 	<ul style="list-style-type: none"> • Employment practices and working conditions should conform to International Labour Organization (ILO) Standards and national regulations. • Rest and recreational facilities and time should be provided, and rules on alcohol and drugs defined and clearly communicated to workers. • The basis for differences in the standard of accommodation should be non-discriminatory; it should be documented and communicated transparently to the workforce.

Improperly abandoned borrow pits	<ul style="list-style-type: none"> • Reuse excess stockpile to back fill pits during grading • Revegetate with appropriate plant species
Security Challenges during project implementation. <ul style="list-style-type: none"> • Security threats to project implementation especially in Borno and Taraba States. 	<ul style="list-style-type: none"> • Work with all security agencies to provide security for contractors during project implementation. • Consult the local communities to improve security awareness during project implementation.

As part of the Environmental and Social (E&S) safeguards documentation required to support RAAMP, an E&S Management Framework (ESMF) is required to manage the process for identifying and mitigating environmental and social risks and impacts in a consistent manner across the entire program. The ESMF also provides the necessary context to ensure that all projects under the program that will involve any form of displacement or loss of livelihoods of any people will comply with both Nigerian law and the AfDB's Operational Safeguards of the Bank.

Consultations

To ensure that the main issues associated with RAAMP were covered, consultation meetings were held at the 6 states under this intervention to discuss with the stakeholders about the project and take their views while first hand observations were also made to develop this ESMF. The stakeholders Plan covering the six states is presented on Table E.

Table E: Stakeholders consulted in the six states

State	Date of Consultation	Stakeholders Consulted
Benue State	September 5, 2019	SPIU, Min of Agric, Environment, Water Resources, Women Affairs, Farmer's Association and PAPs
Taraba State	September 6, 2019	SPIU, Min of Agric, Environment, Water Resources, Women Affairs, Land Development, Farmer's Association and PAPs
Cross River State	September 10, 2019	SPIU, Min of Agric, Environment, Farmer's Association and PAPs
Anambra State	September 11, 2019	SPIU, Min of Agric, Environment, Works, Water Resources, Women Affairs, Farmer's Association and PAPs
Borno State	September 13, 2019	SPIU, Min of Agric, Farmer's Association and PAPs

Gombe State	September 26, 2019	SPIU RAAMP Gombe State
-------------	--------------------	------------------------

The consulted stakeholders are classified in to various categories and the highlights of the consultations of all categories are presented in Table F

Table F: Highlights of consultations

	Stakeholder	Mandate	Objective of Consultation	Highlight of Consultation
1	Federal Project Management Office RAAMP	Coordinate RAAMP on behalf of Federal Ministry of Agriculture and Rural Development	Identify key project development and issues relating to implementation and management as well as capacity for E& S Management	Identification of Environmental and Social issues associated with RAAMP as well as capacities to be put in place as supports for SPIU
2	State Project Management Units for Anambra, Benue, Borno, Cross River, Gombe and Taraba State	Implement RAAMP in their states	Understanding of project components to enable the identification of potential E&S impacts	Highlight of project description and brainstorming on potential E&S Impacts as well as from engineering perspective
3	Project Affected Communities and Persons across the state		Understanding of project components to enable the identification of potential E&S impacts	Project awareness and eliciting information on how the project will affect them.
4	Other Relevant MDAs	Support project implementation	Elicit information that can help in identifying potential E&S Issues associated with RAAMP implementation	Project awareness and eliciting information on potential E&S issues that can emanate from RAAMP

Roles and Responsibilities for Managing E&S Requirements

To ensure that all potential Environmental and Social issues are properly managed, all the key actors in the implementation of the interventions have roles to play. These roles have been highlighted in table G.

Table G: Roles and Responsibilities for managing E& S requirements

No	Steps/Activities	Responsible	Collaboration	Service Provider
1.	Identification and/or siting of the sub-project	State Project Implementation Unit	<ul style="list-style-type: none"> •local authority •Relevant MDAs like Min of Agriculture, Environment, Works etc. 	
2.	Screening, categorization and identification of the required instrument (use the national EIA procedure)	Env. safeguards specialist (ESS) on the PIU	<ul style="list-style-type: none"> •beneficiary; •local authority •Social Safeguards Specialist (SSS) on the PIU 	
3.	Approval of the classification and the selected instrument by the Public EA Agency	PIU Coordinator	<ul style="list-style-type: none"> •ESS-PIU •SSS-PIU 	<ul style="list-style-type: none"> • FMEnv
4.	Preparation of the safeguard document/instrument (ESIA, Env. Audit, simple ESMP, etc.) in accordance with the national legislation/procedure (considering the Bank policies' requirements)			
	Preparation and approval of the ToRs	ESS-PIU	SPIU	<ul style="list-style-type: none"> • FMEnv
	Preparation of the report		<ul style="list-style-type: none"> •Procurement specialist (PS-PIU) •SSS-PIU •Local authority 	<ul style="list-style-type: none"> • Consultant
	Report validation and issuance of the permit (when required)		<ul style="list-style-type: none"> •Procurement specialist (PS-PIU) •SSS-PIU •Local authority 	<ul style="list-style-type: none"> • FMEnv
	Disclosure of the document		NPIU	<ul style="list-style-type: none"> • Media; • AfDB
5.	(i) Integrating the construction phase mitigation measures and E&S clauses in the bidding document prior they're advertised; (ii) ensuring that the constructor prepares his	Technical staff in charge of the sub-project (TS-PIU)	<ul style="list-style-type: none"> • ESS-PIU • PS-PIU 	<ul style="list-style-type: none"> • Control Firm (Supervisor) PEA

	ESMP (C-ESMP), gets it approved and integrates the relevant measures in the works breakdown structure (WBS) or execution plan.			
6.	Implementation of the other safeguards measures, including environmental monitoring (when relevant) and sensitization activities	ESS-PIU	<ul style="list-style-type: none"> • SSS-PIU • PS-PIU • TS-PIU • Financial Staff (FS-PIU) • Local authority 	<ul style="list-style-type: none"> • Consultant • National specialized laboratories • NGOs
7.	Oversight of safeguards implementation (internal)	SSES	<ul style="list-style-type: none"> • Monitoring and Evaluation specialist (M&E-PIU) • FS-PIU) • Local authority 	Control Firm (Supervisor)
	Reporting on project safeguards performance and disclosure	Coordinator	<ul style="list-style-type: none"> • M&E-PIU • ESS-PIU • SSS-PIU 	
	External oversight of the project safeguards compliance/performance	PEA	<ul style="list-style-type: none"> • M&E-PIU • ESS-PIU • SSS-PIU • PS-PIU • Supervisor 	
8.	Building stakeholders' capacity in safeguards management	ESS-PIE	<ul style="list-style-type: none"> • SSS-PIU • PS-PIU 	<ul style="list-style-type: none"> • Consultant • Other qualified public institutions
9.	Independent evaluation of the safeguards performance (Audit)	ESS-PIE	<ul style="list-style-type: none"> • SSS-PIU • PS-PIU 	<ul style="list-style-type: none"> • Consultant

ESMF Budgets

The project implementation will no doubt requires some costs for preparation of applicable E & S studies like ESIA and ARAP/RAP where required. The cost of these shall be determined by variables like total number of roads, length of roads, area coverage as well as distance to be covered by proposed interventions. These cost shall be borne by each state benefiting from this intervention. The budget stated in this ESMF covers capacity building only while the cost of ESMP implementation shall also be a product of the ESMP as

prepared in the ESIA. Cost of mitigation shall be part of contractor's cost. The budget covering capacity building is presented in Table H:

Table H: Budget for capacity building

Item	Unit	Unit Cost	
		Local	US\$
Capacity Building	1	9,360,000	26,000
Total = 26,000USD			

Conclusion

This ESMF has been prepared to provide a unified identification of potential Environmental and Social issues associated with RAAMP implementation in the participating states as well as providing a guide for the preparation of required E & S documentation required for the project.

CHAPTER ONE: INTRODUCTION

1.1 Background Information

The Federal Government of Nigeria has initiated the preparation of the Rural Access and Agricultural Marketing Project (RAAMP), the successor of the Rural Access and Mobility Project (RAMP). The project is being financed by the World Bank, the African Development Bank (AfDB) and the Agence Francaise de Development (AFD). At the moment, the World Bank and AFD are jointly supporting 13 states namely: Abia, Akwa-Ibom, Bauchi, Kano, Katsina, Kebbi, Kogi, Kwara, Ogun, Ondo, Oyo, Plateau and Sokoto while AfDB will support 6 States including Benue, Borno, Anambra, Cross River, Gombe and Taraba State.

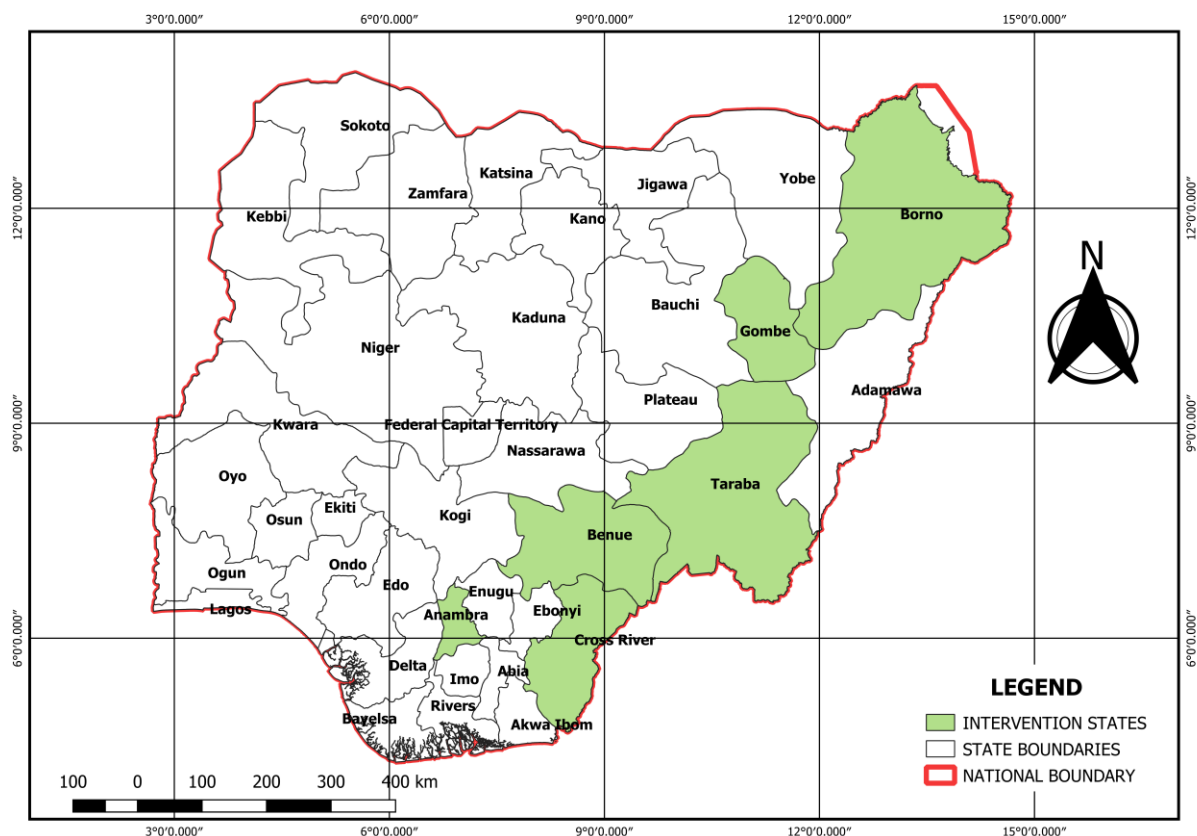


Figure 1.1: Map of Nigeria showing the six states of intervention

The 6 states covered by this ESMF will be supported with financing from the African Development Bank (AfDB). The Lead Agency for the Federal Government is the Federal Department of Rural Development (FDRD) of the Federal Ministry of Agriculture and Rural Development (FMARD). The Federal Project Management Unit (FPMU) is overseeing the project on behalf of FDRD, while the respective state government of Anambra, Benue, Borno, Cross River, Gombe and Taraba will implement it.

The overall objective of RAAMP is to improve rural access and agricultural marketing in the selected participating states, whilst enhancing sustainability of the rural and state road networks.

The Nigeria road network is relatively dense consisting of about 194,000 km of roads. This includes 34,000 km of federal roads, 30,000 km of state roads and 130,000 km of registered rural roads. The road density is about 0.21 km of roads per square kilometre. In spite of the relatively high road density, the rural accessibility index for Nigeria (defined as the proportion of the rural population living within 2 kilometres away from an all-weather road) is low, at only 25.5 percent, leaving about 92 million rural dwellers unconnected. Rural access is limited where the poor population is concentrated. These considerations demand the expansion and improvement of rural road network, and, also, conservation of rural road/transport assets. Furthermore, an improved rural access will enhance the agricultural potentials and marketing opportunities for the agrarian rural communities in Nigeria and, by extension, help in the improvement of livelihoods of the rural population.

The Project Development Objective (PDO) is to improve transport conditions and sustain access to the rural population; enhance agricultural marketing potentials through rehabilitating, installation and maintenance of key rural infrastructure in selected Nigerian states. The ultimate objective of the proposed project is to promote a diversification outside of the oil sector through increased agricultural productivity and marketing of agricultural produce/products thereby reducing rural poverty. It will thus contribute to the country's Transformation Agenda for the agriculture sector.

These productivity gains will promote the economic growth of the non-oil sectors and increase the average income of poor rural households who mostly depend on agriculture for subsistence. The RAAMP project will contribute to maintaining non-oil growth by supporting productivity gains in the agriculture sector, which accounts for the greatest share of Nigeria's non-oil economy. The proposed project will also contribute to improving governance at state level through its performance -based approach, based on the CPS governance criteria.

The development objective of the proposed RAAMP is to improve rural access and agricultural marketing in selected participating states while strengthening the financing and institutional base for sustainable management of the rural and state roads network.

1.2 Rationale for the ESMF

The ESMF is a framework tool that will be used to guide the Environmental and Social Due Diligence (ESDD) process on all projects under the RAAMP. Specifically, the ESMF will be used in guiding the design and due diligence process by ensuring that appropriate environmental and social management measures are considered across the entire lifecycle of the individual projects in the program. The ESMF provides specific details on the following:

- a. safeguards standards and requirements that would be applied to projects under the RAAMP to manage environmental and social risks on projects
- b. safeguards standards and requirements that would be applied to projects under the program that involve land acquisition and/or resettlement and loss of livelihoods of any people will comply with both Nigerian law and the Bank's Operational Safeguards, particularly Operational Safeguards OS2: Operational safeguard 2 – Involuntary resettlement: land acquisition, population displacement and compensation.
- c. the process and procedures for the conduct of the ESDD process for projects;
- d. capacity building plan including budget and
- e. other Environmental & Social requirements which may be applicable to the projects.

1.3 Objectives of ESMF

The objectives of this ESMF are:

- To establish clear procedures and methodologies for the environmental and social planning, review, approval, and implementation of sub-projects-to be financed under RAAMP;
- To provide information about scope of adverse E&S risks and impacts expected during sub-project planning, construction and operation; describe the approach to mitigation and monitoring actions to be taken; and cost implications;
- To provide guidance on how to deal with issues relating to land acquisition, compensation and resettlement during the implementation of sub projects within the RAAMP. This will ensure that displaced and resettled persons are compensated for their loss at replacement cost, given opportunities to share in project created benefits, and assisted with the move and during the transition period at the resettlement sites or locations as applicable.
- To provide guidance to stakeholders participating in the mitigation of adverse social impacts of the project, including

rehabilitation/resettlement operations, in order to ensure that project affected persons (PAPs) will not be impoverished by the adverse social impacts of the projects within the RAAMP.

- To specify appropriate roles and responsibilities and outline the necessary reporting procedures for managing and monitoring E&S concerns related to sub-projects;
- To provide practical resources for implementing the ESMF, including general guidance on the development of sub-project specific Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plan (ESMP) and their implementation, Resettlement Action Plans (RAPs) and their implementation.

This ESMF was prepared after field visits and consultations with a wide range of stakeholders across the 6 states in September 2019.

CHAPTER TWO: REGULATORY AND INSTITUTIONAL FRAMEWORK

2.1 Introduction

This chapter presents an overview of applicable national policies and regulations including the institutional provisions and arrangement that guide the development and implementation of the ESMF as well as the implementation of the sub-projects. The chapter also describes the E&S policies and procedures of AfDB which is the relevant international development agencies supporting the RAAMP in Anambra, Benue, Borno, Cross River, Gombe and Taraba States.

2.2 National Environmental & Social Policies and Legal Provisions related to Environmental Management

2.2.1 National Policy on the Environment (1988)

The National Policy on the Environment describes the conceptual framework and strategies for achieving the overall goal of sustainable development in Nigeria. Specifically, the goals of the Policy include to:

- Secure a quality of environment adequate for good health and human well-being;
- Conserve and use the environment and natural resources sustainably for the benefit of present and future generations;
- Restore, maintain and enhance ecosystems and ecological processes essential for the functioning of the biosphere to preserve biological diversity and the principle of optimum sustainable yield in the use of living natural resources and ecosystems;
- Raise public awareness and promote understanding of the essential linkages between the environment, resources and development, and encourage individual and community participation in environmental improvement efforts; and
- Co-operate with other countries, international organizations and agencies to achieve optimal use of trans-boundary natural resources and effective prevention or abatement of trans-boundary environmental degradation.

2.2.2 EIA Act Cap E12 LFN 2004

The EIA Act No. 86 of 1992 as amended by EIA Act Cap E12 LFN, 2004 is the principal legislative instrument relating to activities that may likely or to a significant extent affect the environment. The Act sets the goals and objectives of EIA and procedures including the minimum requirements for the conduct of

EIA of public or private projects. The Act makes EIA mandatory for all major development projects likely to have adverse impacts on the environment and gives specific powers to FMEnv to facilitate environmental assessment of projects in Nigeria.

FMEnv categorizes mandatory study activities into three categories: Category 3 activities have limited negative impacts and more beneficial impacts on the environment. For Category 2 activities (unless within the Environmentally Sensitive Area) full EIA is not mandatory, while Category 1 activities requires full and mandatory EIA. Projects are pre-listed into these categories based on type and whether it would involve physical intervention of the environment. Either the listing or the result of an Initial Environmental Evaluation (IEE) is used to determine projects requiring full EIA. Infrastructural development projects, including construction and rehabilitation of rural roads are mostly listed under Category 2 and are therefore required to undertake light ESIA.

2.2.3 National Environmental Standards and Regulations Enforcement Agency (NESREA) Act 2007

The Act established a body known as NESREA to be the enforcement Agency for environmental standards, regulations, rules, laws, policies and guidelines in Nigeria. The Act empowers the Agency to have responsibility for the protection and development of the environment, biodiversity conservation and sustainable development of Nigeria's natural resources in general and environmental technology, including coordination and liaison with relevant stakeholders within and outside Nigeria on matters of enforcement of environmental standards, regulations, rules, laws, policies and guidelines.

2.2.4 National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations, 1991

These Regulations address handling and management of solid, radioactive and (infectious) hazardous waste. They define the objectives of management of solid and hazardous waste, the functions of appropriate Government agencies and obligations of industries. The Regulations mandate all industries to inform FMEnv of all toxic, hazardous and radioactive substances which they keep in their premises and/or which they discharge during their production processes. Schedule 12 and 13 of the Regulations provide a comprehensive list of all waste deemed to be hazardous and dangerous. Construction and rehabilitation of rural roads will in no doubt generate solid and hazardous waste which this regulation covers.

2.2.5 National Environmental (Sanitation and Wastes Control) Regulations, 2009

The Regulations provide the legal framework for the adoption of sustainable and environment friendly practices in sanitation and control of solid wastes, hazardous wastes and effluent discharges to minimize pollution. Part 3 of the Regulations states that all owners or occupiers of premises shall provide waste receptacles for storage before collection by licensed waste managers. In addition, the Regulations make it mandatory for facilities that generate waste, to reduce, re-use, recycle and ensure safe disposal to minimize pollution. The Regulations also spell out roles and responsibilities of State and Local Government Authorities. The management of waste generated as well as sanitation conditions of contractor's camp during the interventions underscores the relevance of this regulation.

2.2.6 National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes) Regulations, 1991

The Regulations prohibit industry or facility from release of hazardous or toxic substances into the air, water of Nigeria's ecosystems beyond the permissible limits of FEPA (now FMEnv). The Regulations further charge any industry or facility to:

- Establish and maintain a pollution monitoring unit within their premises;
- Ensure on site pollution control; and
- Assign the responsibility for pollution control to a person or body accredited by the FMEnv. Section 5 of the Regulations mandate industry or facility to submit to the nearest office of FMEnv a list of chemicals used in the manufacture of its products, details of stored chemicals and storage conditions and where these chemicals were obtained, bought or sold.

2.2.8 National Environmental (Noise Standards and Control) Regulations, 2009

The purpose of these Regulations is to ensure maintenance of a healthy environment for all people in Nigeria, the tranquillity of their surroundings and their psychological wellbeing by regulating noise levels. The Regulations prescribe the maximum permissible noise levels on a facility or activity to which a person may be exposed and provide for the control of noise and for mitigating measures for the reduction of noise. Construction and rehabilitation of rural roads will increase the noise level within the immediate of project area.

2.2.9 National Environmental (Surface & Groundwater Quality Control) Regulations 2011

The purpose of these Regulations is to restore, enhance and preserve the physical, chemical and biological integrity of the nation's surface waters and to maintain existing water uses. The Regulations also seek to protect groundwater sources by regulating the discharge of hazardous wastes, fossil fuels energy and any other substances having the potential to contaminate groundwater. The Regulations also include amongst others, the application and general provisions of water quality standards for various uses such as agriculture, industrial, aquatic life and recreation.

2.2.10 EIA Sectoral Guidelines for Infrastructure – Transportation Development Project (Roads and Highways) 1995

The EIA Sectoral Guidelines for Infrastructure, specifically that for “Transportation Development Project” - (Roads and Highways) apply to this project. The guidelines were designed to assist project proponents in conducting detailed environmental assessment of roads and highways projects with emphasis on the significant associated and potential impacts of such projects on the environment. Mitigation measures for avoiding, minimizing or alleviating any adverse impacts as well as future monitoring programme for ensured sustainability of the project are also contained therein for guidance.

2.2.11 National Environmental (Construction Sector) Regulations, 2011. (S.I No. 19)

The purpose of these regulations is to prevent and minimize pollution from construction, decommissioning and demolition activities in the Nigerian environment. It stipulates that new projects in the construction sector shall apply cost-effective, up-to-date, efficient, best available technology, to minimize pollution to the barest degree practicable. In addition, every operator or facility shall carry out an EIA and submit an EMP for new projects or modification including expansion of existing ones before commencement of activity. Part II of these regulations discusses specific provisions for site waste management plans, storm water discharge, lighting activities, control of dust and fugitive emission, noise control, avoiding nuisance, hazardous substances, use of asbestos, spent oil, prevention and control of explosion hazards, radiation, polluter-pays-principle, community relations and close-out. Schedule I discusses the best practices in construction, while Schedule III outlines the guidelines in preparing an EMP. Schedule VI presents the recommended personal protective equipment according to hazard. Schedule VII presents the noise limits for various working environments, while schedule VIII presents the minimum limits for workplace illumination intensity.

Schedule IX discusses the blasting guidelines, while schedule X discusses the close-out guidelines.

2.2.12 National Environmental (Wetlands, River Banks and Lake Shores) Regulations, 2009. (S.I No. 26)

The objectives of part 1 of these regulations is to provide for the conservation and wise use of wetlands and their resources in Nigeria, to ensure catchments conservation and flood control, as well as to minimize and control pollution. It stipulates that a proponent or developer desiring to conduct a project which may have a significant negative impact on wetlands, riverbanks and lakeshores, shall be required to carry out an EIA in line with extant regulations and act. The second schedule of the regulations outlines the regulated activities in a wetland, which includes the construction of transport and communication facilities such as roads.

2.2.13 Other Applicable National E&S Legal Provisions

A summary of other relevant existing Nigerian laws and regulations is provided in Table 2.1 below.

Table 2.1. Other Relevant National E&S Laws and Regulations

Laws and Regulations	Summary of Provisions
Forestry Law CAP 51 LFN 1994	This Act provides for the preservation of forests and the setting up of forest reserves. It is an offence, punishable with up to 6 month imprisonment, to cut down trees over 2ft in height or to set fire to the forest except under special circumstances. RAAMP interventions which focuses on rural areas must ensure that the intervention does not violate the forestry act except under special circumstances as stated in the Act.
Endanger Species (Control of International Trade and Traffic) Act CAP E9 LFN 2004	This Act prohibits, except under a valid license, the hunting, capture or trade in animal species, either presently or likely to be in danger of extinction and defines the liability of any offender under this Act. It also provides for regulations to be made necessary for environmental prevention and control as regards the purposes of this Act. Preservation of endangered species under this Act shall also be a focus of RAAMP interventions most importantly where such species are encountered.
Harmful Wastes (Special Criminal Provisions etc.) Act CAP HI LFN 2004	An Act to prohibit the carrying, depositing and dumping of harmful waste on any land, territorial waters and matters relating thereto including penalty for offences for individuals and corporate bodies. The Act prohibits all activities relating to the purchase, importation, transit, transportation, deposit, storage or, sale of harmful wastes.
National Environmental (Ozone	These provisions seek to prohibit the import, manufacture, sale and the use of ozone-depleting substances as well as materials that contain these substances.

Laws and Regulations	Summary of Provisions
Layer Protection) Regulations, 2009	
National Environmental (Soil Erosion and Flood Control) Regulations, 2011	The overall objective of these Regulations is to control erosion and flooding by checking all earth-disturbing activities, practices or developments for non-agricultural, commercial, industrial and residential purposes.
Employee Compensation Act, 2010	The Act provides compensation to employees who suffer from occupational diseases or sustain injuries arising from accidents at workplace or in the course of employment. Payment of compensation (to the worker or to his dependents in case of death) by the employer is rooted in the accepted principle that the employer has a duty of care to protect the health, welfare and safety of workers at work.
Nigerian Urban and Regional Planning Act CAP 138 LFN 2004	The Act is aimed at overseeing a realistic, purposeful planning of the country to avoid overcrowding and poor environmental conditions. The Act establishes that an application for land development would be rejected if such development would harm the environment or constitute a nuisance to the community.
EIA Procedural Guidelines, 1995	Provides Procedural context and guidance for the conduct of EIA in Nigeria
Natural Resources Conservation Act CAP 268 LFN 1990	The Natural Resources Conservation Act CAP 268 LFN 1990 is the most direct existing piece of legislation on natural resources conservation. The Act establishes the Natural Resources Conservation Council, which is empowered to address soil, water, forestry, fisheries and wildlife conservation by formulating and implementing policies, programmes and projects on conservation of the country's natural resources.

2.2.14 The State Legislations

In accordance with Section 24 of the FMEnv Act, Chapter 131 of the Laws of the Federal Republic of Nigeria, 1990, the State Environmental Protection Edicts are enacted. The edict empowers the state environmental protection agency to establish such environmental criteria, guidelines/specifications or standards for the protection of the state's air, lands and waters as may be necessary to protect the health and welfare of the people. The functions of State agencies or ministries among others include:

- Routine liaison and ensuring effective harmonization with the FMEnv in order to achieve the objectives of the National Policy on the Environment;
- Co-operate with the FMEnv and other relevant regulatory agencies in the promotion of environmental education;
- Be responsible for monitoring compliance with waste management standards; and

- Monitor the implementation of the EIA and Environmental Audit Report (EAR) guidelines and procedures on all developmental policies and projects within the State.

2.3 Transport Sector Policies and Legal Provisions

2.3.1 National Road Traffic Regulations, 2012

This regulation in consonance with the FRSC (Establishment Act), 2007 enables the Commission to (1) provide operational requirements, rules and regulations for inter alia (i) the registration and licensing of vehicles, (ii) driving and general duties of drivers of vehicles or passengers on public roads, (iii) use of speed limits, traffic signs and trafficators, (iv) road crossing, (v) parking of vehicles, (vi) hindering or obstructing traffic on public road, (vii) damage to public road, (viii) pedestrian crossing, (ix) special provisions relating to use of the expressway, and (x) reporting of road crashes. (2) make provisions relating to exempted bodies, operators of transport services, operation of ambulance services and towing vehicles; and (3) provide miscellaneous motor traffic regulations to ensure road safety.

2.3.2 Nigerian Highway Code (2016)

The Highway Code is a policy framework or an official guide developed by FRSC to ensure the safe and efficient use of Nigerian roads. It sets out rules and regulations for road users to comply with for their safety.

2.4 The Gender Policy Framework in Nigeria

The 1999 Constitution of the Federal Republic of Nigeria prohibits discrimination based on places of origin, sex, religion, status, ethnic or linguistic association. Successive governments have always demonstrated commitment to upholding this and to promote gender equality and women's empowerment in varying degrees. To facilitate gender equality and women's empowerment, the FGN created favorable national legal and policy frameworks and put in place institutional mechanisms in this regard.

Moreover, Nigeria, as a member of the United Nations, signed and ratified the various relevant international instruments, treaties and conventions without reservation. These instruments have always emphasized that member nations put in place the necessary mechanisms needed to eliminate gender discriminations, ensure equality and human dignity to all men and women.

The government of Nigeria in 2000 adopted a National Policy on Women, in 2006, it was reviewed and upgraded to become the National Gender Policy.

Other key government policies with gender equality and empowerment of women frameworks include the National Economic Empowerment and Development Strategies (NEEDS) in May 2004; and the Transformation Agenda of the immediate past administration who in developing the Vision 2020, had a 'Special Interest Group on Women' to oversee –the development of policy statements that engender 'sustainable human and national development built on equitable contribution of the Nigerian women, men and children'.

2.4.1 National Gender Policy, 2006

The overall goal of the National Gender Policy of Nigeria is to promote the welfare and rights of Nigerian women and children in all aspects of life: political, social and economic. The policy seeks to plan, coordinate, implement, monitor and evaluate the development of women in the country. In concrete terms, the National Gender Policy in Nigeria focus on:

- Contribution towards women's empowerment and the eradication of unequal gender power relations in the workplace and economy, in trade unions and in broader society;
- Encouragement of the participation, support and co-operation of men in taking shared responsibility for the elimination of sexism and redefining of oppressive gender roles;
- Increase the participation of women in leadership and decision-making;
- Ensure that through labour legislation and collective bargaining, the particular circumstances of women are considered and that measures are promoted to eliminate discrimination on the basis of gender;
- Ensure that there is a gender perspective in all sectors of development.

2.5 Nigerian Institutional Provisions and Arrangement

2.5.1 Federal Ministry of Environment

The Federal Ministry of Environment (FMEnv) which was formerly known as the Federal Environmental Protection Agency (FEPA) was established in 1999 through Decree No. 58 of 1988 as amended by Decree No. 59 of 1992. The Ministry is the statutory government institution mandated to coordinate environmental protection and natural resources conservation for sustainable development in Nigeria. Some of the other mandates of the Ministry include:

- Advising the Federal Government on national environmental policies and priorities, conservation of natural resources, sustainable development as well as scientific and technological activities affecting the environment and natural resources; and

- Prescribing standards and formulating regulations on water quality, effluent limitations, air quality, atmospheric protection, ozone protection, noise control as well as the removal and control of hazardous substances.

2.5.2 National Environmental Standards and Regulations Enforcement

Agency (NESREA)

The National Environmental Standards and Regulations Enforcement Agency (NESREA) was established by the NESREA Act of 30th July 2007 as an Agency of the FMEnv. NESREA is charged with the responsibility of enforcing all environmental laws, guidelines, policies, standards and regulations in Nigeria. It also has the responsibility to enforce compliance with provisions of international agreements, protocols, conventions and treaties on the environment to which Nigeria is a party.

2.5.3 Ministry of Agriculture and Rural Development

The Federal Ministry of Agriculture and Rural Development (FMARD), is a Ministry of the Nigerian government that regulates agricultural research, agriculture and natural resources, forestry and veterinary research all over Nigeria. The vision of the Ministry is to grow Nigeria's agricultural sector. Specifically, the vision is to "achieve a hunger-free Nigeria through an agricultural sector that drives income growth, accelerates achievement of food and nutritional security, generates employment and transforms Nigeria into a leading player in global food markets to grow wealth for millions of farmers". One of the ways to achieve this is to develop rural roads that can serve as links between agricultural areas to market hubs. This will help farmers to reduce wastage occasioned by constraints of getting their goods to the market.

2.6 National Environmental & Social Policies and Legal Provisions related resettlement

2.6.1 Introduction

The legal basis for resettlement in Nigeria is the Land Use Act of 1978, modified in 1990. According to the Act, all land in Nigeria is vested in the Governor of each State, to be held in trust for the use and common benefit of all people. The administration of urban land is directly under the control and management of the Governor, whereas non-urban land is under the control and management of the Local Government Authority. The Governor has the right to grant statutory rights of occupancy to land while the Local government has the right to grant customary rights of occupancy. Since the Land use Act gives to the State ownership of all land, compensation by projects and sub-projects

is restricted to structures, installations, and improvements on the land, not the land itself. However, the Act does require the State or Local Government to provide alternative land for affected people who will lose farm land, residential (commercial/industrial) plots.

2.6.2 Land Use Act – 1978

The principal piece of legislation for the expropriation of land in Nigeria is the Land Use Act, 1978 Cap L5, and Laws of the Federation of Nigeria (LFN) 2004. The law establishes the legal framework for government expropriation of land from individuals and communities, when it is required for “overriding public interest/good”. It prescribes the circumstances under which the State can revoke rights of occupancy to the land and the compensation provisions that are required.

Before 1978, the principal land tenure systems differed in Northern Nigeria and Southern Nigeria, with the Northern Nigeria Land Tenure System [NNLTS] and the Southern Nigeria Land Tenure System [SNLTS]. Traditionally, NNLTS was based on the premise that land belongs to the Government (i.e. no private ownership), while the SNLTS was based on the premise that land belongs to communities, families and individuals.

The Land Use Act came into force on 29th March 1978 and replaced all pre-existing land tenure systems in Nigeria. The Act essentially does three things:

- It places land into two categories: urban land and non-urban land, as designated by the Governor of a state wherein the land lies.
- It redefines title in land to be a right to occupy or use the land, rather than to own it; namely:
 - a statutory right or a deemed statutory right of occupancy for land in urban areas; and
 - a customary right or a deemed customary right of occupancy for land in non-urban areas.
- It empowers the Governor of a state to revoke rights of occupancy.

There were several key repercussions as a result of the Act:

- There is now a common Land Tenure System throughout the country;
- Control and management of land is in the hands of Government;
- A system of registration of titles has been introduced and paper titles (Certificates of Occupancy) are issued; and
- The process of acquiring land is deemed to have been simplified for developers.

The most significant change in the land tenure system, brought about by the Land Use Act, is the empowerment of the Governor of a state to revoke rights

of occupancy compulsorily, for public purpose. Section 28(1) makes it lawful for the Governor to revoke a right of occupancy for “*overriding public interest*”.

Sections 28 (2) (b) and (3) (a) define this to mean, among other things, “...*the requirement of the land by the state for public purposes within the state*”. This means that a governor can revoke the right of occupancy to land (i.e. expropriate) for use either by the State, Local or Federal authority for overriding public interests. As per the provisions of the Land Use Act, this can include telecommunication, power projects, hospitals, market places, mining activities or agricultural use etc. When rights of occupancy are subject to revocation in this way, holders of rights of occupancy are, under the Land Use Act, entitled to compensation.

However, this compensation is for the value of land improvements (“*unexhausted improvements*”) at the date of revocation (section 29). Depreciation is considered when assessing the value of these improvements based on the national process of land-taking. The term “*unexhausted improvement*” is defined in Section 51 of the Land Use Act as:

“anything of any quality permanently attached to the land directly resulting from the expenditure of capital or labour by an occupier or any person acting on his behalf and increasing the productive capacity the utility or the amenity thereof and includes buildings, plantations of long lived crops or trees, fencing, wells, roads and irrigation or reclamation works, but does not include the result or ordinary cultivation other than growing produce.”

Where occupancy rights are not claimed by any one individual, the Act states that the recipient of the compensation may be:

- a. the community;
- b. the chief or leader of the community, to be disposed of by him for the benefit of the community in accordance with the applicable customary law; or
- c. a community fund, to then be utilised for the benefit of the community (section 29(3)).

All rights of occupancy whether granted by the State or Local authority are typically for a fixed tenure and not usually more than 99 years. A person may not be entitled to compensation if the leasehold has expired.

The Land Use Act has provisions for compensation in kind, rather than cash, through the provision of Resettlement Land. Section 33 of the Land Use Act stipulates that, when alternative land has been given, compensation will be deemed to have been made. The concerned party is thereby prevented by law from demanding further financial compensation.

The provision of Section 43 of the Constitution affirms the fundamental rights of persons and communities to own and hold land or property. It stipulates that any authority taking such land must do so in accordance with a law made in that regard. Importantly, such authority is required to pay the affected party compensation. Additionally, they must afford the right of access to the relevant adjudicatory forum, where any grievances regarding the amount of compensation to be paid and/or interest to the land in question, can be raised and resolved.

2.6.3 Overview of the Land Take process in Nigeria

The process involves the following steps:

Step 1: Preparation of a Survey Description

This is a preliminary survey / mapping of the property intended for land-take. The survey description is to be prepared by the Ministry of Lands and should contain the following information:

- Position and dimensions of the land parcel to be acquired;
- Spatial relation to other properties in the area; and
- A list of all the communities on the property.

The survey description provides the basis / information upon which approval for the chosen property to be acquired is provided and the property is thus surveyed or marked out with suitable marking points (see Step 3).

Based on the field visits undertaken during the preparation of the ESMF, there is the potential for economic displacement and physical displacement of shops and businesses within the RoW. Although there will be no new land expropriation as the eligible rural roads are existing with ROW already delineated. Physical and economic displacements are expected to affect economic trees, artisans, business operators and traders.

Where land is needed for contractor's base during project implementation, the contractor shall consult the land owners and pay for lease at the appropriate rate within the agreed timeline.

Step 2: Publication of a Notice of Acquisition

This is usually prepared by the Ministry of Lands and is then published in two newspapers (one national and the other local) and the government gazette, in order to enable any claims or objections to the intended acquisition to be made. These claims have to be made within the given period stated in the publication.

The notice must also be approved and signed by the Governor, along with the survey description, before publication. Both documents are usually forwarded to the Governor with a covering memo prepared by the Permanent Secretary and signed by the Honourable Commissioner for Lands.

Claims are then usually forwarded in writing to the Ministry of Lands within the stipulated period stated in the publication of the notice, following which the processing of claims and the negotiation of compensation can begin.

Since projects under RAAMP will not require land expropriation, this step will not be required. However, prior notice shall be given to owners of businesses and economic trees along the RoW.

Step 3: Surveying the Property

Surveying can be conducted immediately, and before the expiration of the notice period. The time that this takes to complete depends on the speed with which the survey fees are agreed and funds dispersed to the Ministry of Lands. It is understood that the Ministry of Lands has the sole right to do the surveying work when it is the State that is acquiring the land. However, this does not prevent independent surveyors from being employed by RAAMP in order to ensure compliance with international standards. This step incorporates detailed consultation with local communities on the RAP principles and the start of the direct consultation process directly with the affected individuals. Individual PAPs or their representatives will have access to the project developer to verify issues relating to their properties through GRM.

Even though it is largely not anticipated based on site visits and discussions with PIU across the states, where there is any need for additional land during implementation, RAAMP shall commission external surveyors and external consultants to carry out the survey of all properties to be affected by the projects. This will allow independent assessment from both State Governments and RAAMP to ensure that the PAP is not negatively affected by the project

Step 4: Assessment

This is essentially a State enumeration and valuation of unexhausted improvements on the land (estimates of compensation amounts due to affected individuals) to determine the compensation liability of government and for tax purposes (in cases involving private purchase of land). The compensation amounts arrived at are then discussed with the affected community or its attorney where the evaluator is present. Once agreement is reached, the compensation is paid. In some cases, direct disbursement takes place to each household. In other cases, the compensation is provided to the attorney who is then responsible for onward distribution. However, for projects in RAAMP, payments for compensation will not be made to attorney but directly to the PAPs. For land take, the Bank prefers land for land compensation

and this should be prioritized while cash compensation should be the last option.

Payment of agreed compensations should be done directly to PAPs with documented evidence

Step 5: Registration and Stamping

This process involves placing land sale agreements (including survey plans / maps clearly delineating the piece of land in the sale transaction) at the lands registry / records after they have been stamped at the office of Commissioner of Stamp Duties, upon the payment of a fee. The Certificate of Occupancy is also registered at the Lands Registry for records purposes, after stamping of the documents. In the case of compulsory land-take (as in the Project case) there are no sale documents for stamping or registration; however, the Certificate of Occupancy issued to the Project Company may be registered with the Lands Registry.

Any new land taken to upscale rural roads shall be imputed into the state infrastructural master plan after approval has been given for such land and compensation paid

Step 6: Preparation of Certificate of Occupancy

The Certificate of Occupancy is then prepared by the Ministry of Lands and signed by the Governor, after which it is issued to the applicant. The overall land acquisition process may be concluded within approximately **twelve to eighteen weeks**. It is envisaged that Certificate of Occupancy will not apply to projects under RAAMP as not land expropriation is expected.

The end product of RAP process shall ensure that there is a Certificate of Occupancy issued to the project by the Governor of states concerned. This is to prevent future encroachment as available land title will prevent double allocation. In the case of RAAMP where mainly economic crops and trees as well as few economic activities will be affected, the end product shall be a sign off list of PAPs which indicates that they have been consulted and compensated appropriately.

2.6.4 Legal Mechanisms for Resolving Land-related Grievances

2.6.4.1 The Constitution

The Constitution specifically guarantees the right of individuals to acquire and own immovable property [Section 43]. It further gives individuals the right to

dispute decisions made in the courts of the country. If any person feels that their right to own and acquire property is threatened or their entitlement to compensation has been overlooked or underestimated, they may approach the High Court of a State for necessary redress [Sections 44 (a) and (b) and 46 of the Constitution].

2.6.4.2 Land Use Act

The Land Use Act only makes provisions for a dispute in relation to compensation payable; stating that it should be referred to the relevant committees established by the governor of the concerned state. There are no provisions in place for challenges against the legitimacy of a revocation order by the governor. This may be connected to the Trusteeship position of the governor and the fact that such revocation is seen to be based on the overriding public good of the people.

An aggrieved party may approach the high court of a state in relation to compensation payable for improvements on land (Section 39 (2)). In urban areas, aggrieved persons or group of persons are to raise their grievances with the Land Use and Allocation Committee. For non-urban areas, such disputes are laid before the Land Allocation Advisory Committee. These two committees are constituted by the governor of a state.

2.6.4.3 Scope of the Land Use and Allocation Committee

The Terms of Reference of the Land Use and Allocation Committee are described in Section 2(2) (a) – (c) of the Land Use Act and includes:

- advising the governor on any matter connected with the resettlement of persons affected by revocation of right of occupancy on the grounds of overriding public interest; and
- determining disputes as to the amount of compensation payable under the Act for improvement on land.

The Committee is made up of at least two (2) people who are qualified under the civil service to be appointed estate surveyors or land officers.

2.7 Traditional Land Tenure in Nigeria

The legal context of land tenure in Nigeria is complex, resulting from the co-existence of traditional (at times with Islamic influence) and state systems, neither of which is dominant.

Traditional land tenure in Nigeria is based on traditional laws under which land is considered community property. Title to land under traditional law is vested

in the community; no individual within the unit can lay claim to any portion of it as a formal owner. Individuals only ever retain rights to use. Normally, the village chief of a community acts as the 'manager', holding the land for the use of the whole community, and they mediate disputes involving traditional landholdings.

An individual enjoys rights to the land for farming within his lineage or community area. The individual possesses the land to the extent that he uses it for his family's or society's benefit and passes the land on to heirs (i.e. traditional rights to land can be inherited) or pledges its use to satisfy a debt. The right of disposal belongs to the community only, which, acting through traditional authorities or family representatives, exercises this right in accordance with traditional law.

Where decisions about land use need to be made within a family, representative members of different branches are selected (e.g. from different branches within a polygamous family) and come to agreement about the issue. This happens most often regarding transactions between the family and third parties in conjunction with the village chief.

Under traditional land tenure women can inherit land from their fathers, but not from their husbands. While women may be "granted" plots by their husbands, often for crop production, they do not retain the right to use this land following their husband's death. Rather, the total land holdings of the husband are subdivided equally according to the number of wives, and use rights pass directly to the children. This includes passing to female children, so women are able to inherit land from their fathers, through their mothers. They are then free to pass this land on to whomever they choose.

2.7.1 Certificates of Occupancy

The Nigerian mechanism to formalise customary land ownership is a Certificate of Occupancy, which is issued by an authorised Government Office as evidence of a holder's right to occupy and use a specific piece of land under certain terms of contract. Certificates of Occupancy afford customary rights of occupancy to land in non-urban areas for agricultural, residential, grazing and other uses. Certificates of Occupancy can be granted for a period of time up to 99 years.

2.8 Institutional Framework

Compensation and resettlement issues fall under the jurisdiction of various levels of government in Nigeria. They are also governed by a range of legislation. Some of the principal government institutions and laws and their impacts are described below.

2.8.1 Federal Government

Nigeria functions under a Presidential system of government. The President, elected for a maximum of two terms of four years each, serves as both head of state and head of government. The President wields executive power through the Federal Executive Council, which is also composed of the Vice President and a representative of each state as Ministers.

Legislative power is vested in the bicameral National Assembly of Nigeria, whose members are popularly elected for four-year terms. The upper house (Senate) comprises 109 members while the lower house (House of Representatives) has 360 members. The Senate and House of Representatives have concurrent legislative functions. Bills are not deemed to be validly passed if they have not received the joint assent of both houses.

The Federal Government typically has limited involvement in land acquisition and resettlement, except in cases related to federal property, which is not the case for this Project.

2.8.2 State Government

Nigeria is a federal republic comprised of 36 states and a Federal Capital territory in Abuja. The executive powers of each state are vested in the governor, who exercises these powers directly or through the deputy governor, commissioners or other designated state officials. The legislative powers of a state are vested in the House of Assembly. The House of Assembly has power to make laws for the peace, order and good government of the state.

In light of the fact that the Land Use Act (1978) prohibits challenge to the acquisition of land and gives the Governor of the State/Local Councils authority to issue (or revoke) statutory or traditional rights of occupancy, the main focus of government engagement for land acquisition and resettlement is at the State and Local Government levels.

The ministries and parastatals at the state level that will have some input into or provide some oversight regarding land acquisition, land-take and resettlement planning include the Ministry of Land; Ministry of Agriculture; Ministry of Environment; Ministry of Water Resources; Ministry of Commerce; Ministry of Local Government; Ministry of Justice and Ministry of Women Affairs.

2.8.3 Local Government

At the local level, Project and sub projects falls within a particular Local Government. A typical LGA is headed by an Executive Chairman, and has a Vice Chairman, Secretary to the Local Government, Treasurer and a Council Manager who, together with the department supervisors, form the Executive Committee. Key departments at the local government level which are likely to

be of relevance to this Project include: Women's Affairs and Poverty Alleviation; Education (specifically the Local Government Education Authority); Agriculture and Rural Development (including Culture and Tourism, and Community Development Associations); Works and Housing; and Health (Medical Officer of Health).

Local government administrations usually have a wide variety of functions prescribed under the Constitution, including but not limited to:

- Construction and maintenance of roads, streets, street lightings, drains, parks, gardens and open spaces.
- Provision and maintenance of public conveniences, sewage and refuse disposal
- Registration of births, deaths and marriages.
- Assessment of privately owned houses or tenements for the purpose of levying such rates as prescribed by the House of Assembly of the State.
- Participation in the provision and maintenance of primary, adult and vocational education.
- The development of agriculture and natural resources, other than the exploitation of materials
- The provision and maintenance of health services.
- Establishment and maintenance of cemeteries, burial grounds and homes for the destitute or infirm.

2.8.4 Traditional Leadership

The traditional leaders are the custodians of the land who oversee day to day activities in the various communities. They are relevant for the engagement with affected persons and information dissemination. They also have local knowledge which could be relevant to the Project and are key in achieving community buy in. Their role is to facilitate stakeholder engagement at the community level, manage disputes and grievances, and provide information on community preferences and livelihood restoration options.

For each of the RAAMP project, a comprehensive Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM) will need to be developed.

The goal of the SEP shall be to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions.

Develop a Grievance Redress Mechanism and make it operational to take care of issues arising from involuntary resettlement and other E&S issues. The Grievance Redress Committee should have members of traditional leadership of communities as members

2.8.5 International Standards and Guidelines related to Involuntary Displacement

In addition to the need to adhere to Nigerian legislative requirements, RAPs of RAAMP projects will also need to be aligned to international best practice standards in involuntary land acquisition and compensation. As the main funding agency, the RAPs will need to be aligned with the requirements of the AfDB's Integrated Safeguards Standards (ISS) Operational Safeguards 2: Involuntary resettlement: land acquisition, population displacement and compensation as well as the Bank's Involuntary Resettlement Policy of 2003. The policy was developed to cover involuntary displacement and resettlement of people caused by a Bank financed project and it applies when a project results in relocation or loss of shelter by the persons residing in the project area, assets being lost or livelihoods being affected.

2.8.6 The African Development Bank Group's (AfDB) Integrated Safeguard System (ISS)

In 2013, the African Development Bank Group updated their policy on Involuntary Resettlement and created an Integrated Safeguards System (ISS) to improve clarity, coherence and consistency as well as overall operational effectiveness. Resettlement is covered under Operational Safeguard 2 (*Involuntary Resettlement: Land Acquisition, Population Displacement and Compensation*), which includes comprehensive notions of livelihood and assets, accounting for their social, cultural, and economic dimensions. It also adopts a definition of community and common property that emphasises the need to maintain social cohesion, community structures, and the social interlinkages that common property provides. It furthermore stresses the importance of improving living conditions for PAPs through a Livelihood Restoration programme.

OS 2 has the following specific objectives to:

- avoid involuntary resettlement where feasible, or minimise resettlement impacts where involuntary resettlement is deemed unavoidable after having explored all other alternative project designs;
- ensure that displaced people are meaningfully consulted and given opportunities to participate in the planning and implementation of resettlement programmes;

- ensure that displaced people receive significant resettlement assistance under the project, so that their standards of living, income-earning capacity, production levels and overall means of livelihood are improved beyond pre-project levels;
- mitigate the negative impacts of displacement and resettlement, actively facilitate social development and establish a sustainable economy and society; and
- set up a mechanism for monitoring the performance of involuntary resettlement programs and remedying problems as they arise so as to safeguard against ill-prepared and poorly implemented resettlement plans.

2.9 International Conventions and Agreements applicable to the sector

Apart from the National Laws, Acts and Regulations, Nigeria is a signatory or party to many International Environmental Conventions and Treaties that are relevant to the energy sector. A list of some of the relevant International Environmental Conventions and Treaties ratified by the Government of the Federal Republic of Nigeria are presented in Table 2.2.

Table 2.2. Selected international agreements and conventions to which Nigeria is a signatory

Regulations	Year Adopted
1. United Nations Framework Convention on Climate Change (UNFCCC)	1992
2. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal	1989
3. Montreal Protocol on Substance that Deplete the Ozone Layer	1987
4. Vienna Convention on the Ozone Layer	1985
5. Convention on Conservation of Migratory Species of Wild Animals	1979
6. Convention on the Protection of the World Cultural and Natural Heritage (world Heritage Convention), Paris	1975
7. Convention to Regulate International Trade in Endangered Species of Fauna and Flora (CITES)	1973
8. Convention on the Conservation of Migratory Species of Wild Animals (CMS or Bonn Convention) (Signatory only)	1988
9. African Convention on the Conservation of Nature and Nature Resource	1968
10. Paris Agreement	2015

2.10 The African Development Bank (AfDB)

2.10.1 The African Development Bank (AfDB) Integrated Safeguards System (ISS)

The E&S safeguards of the AfDB are a cornerstone of the Bank's support for inclusive economic growth and environmental sustainability in Africa. AfDB will apply the Integrated Safeguards System for all sub-projects considered under RAAMP. The Bank ISS is designed to promote the sustainability of project outcomes by protecting the environment and people from the potentially adverse impacts of projects. This requires that all the projects will comply with the safeguard requirements of the ISS during sub-projects preparation and implementation. The safeguards aim to:

- Avoid adverse impacts of projects on the environment and affected people, while maximising potential development benefits to the extent possible;
- Minimise, mitigate, and/ or compensate for adverse impacts on the environment and affected people when avoidance is not possible; and
- Help borrowers/clients to strengthen their safeguard systems and develop the capacity to manage E&S risks.

The ISS consists of four interrelated components as summarized in Figure 2.1 Figure below.

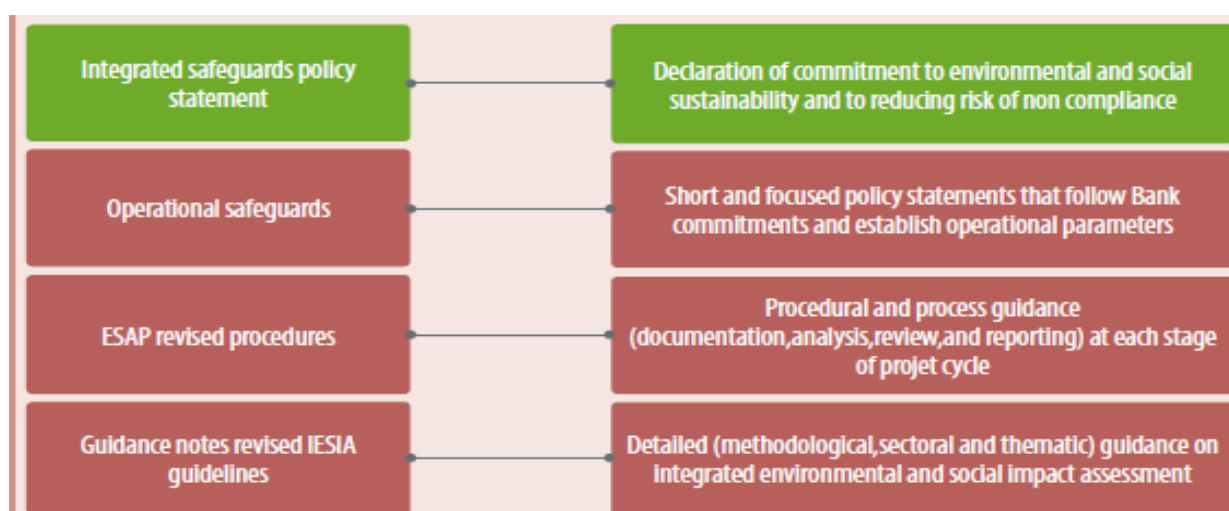


Figure 2.1: Structure of the AfDB ISS

2.10.2 The Integrated Safeguards Policy Statement

This describes common objectives of the Bank's safeguards and lays out policy principles. It is designed to be applied to current and future lending modalities, and it considers the various capacities and needs of regional member countries in both the public and private sectors. The Integrated Safeguards comprises of Policy Statement that sets out the basic tenets that guide and

underpin the Bank's approach to environmental safeguards. The Bank's Integrated Safeguards Policy Statement sets out the Bank's own commitments to and responsibilities for delivering the ISS: to

- i. ensure the systematic assessment of E&S impacts and risks;
- ii. apply the OSs to the entire portfolio of Bank operations;
- iii. support clients and countries with technical guidance and practical support in meeting the requirements;
- iv. implement an adaptive and proportionate approach to E&S management measures to be agreed with clients as a condition of project financing;
- v. ensure that clients engage in meaningful consultations with affected groups;
- vi. respect and promote the protection of vulnerable groups, in a manner appropriate to the African context.

2.10.3 Operational Safeguards (OSs)

These are a set of five safeguard requirements that Bank clients are expected to meet when addressing social and environmental impacts and risks. Bank staff use due diligence, review, and supervision to ensure that, clients comply with these requirements during project preparation and implementation. Over time the Bank may adopt additional safeguard requirements or update existing requirements to enhance effectiveness, respond to changing needs, and reflect evolving best practices. The five OSs are presented in Table 2.3.

The OSs are intended to:

- Better integrate considerations of E&S impacts into Bank operations to promote sustainability and long-term development in Africa;
- Prevent projects from adversely affecting the environment and local communities or, where prevention is not possible, minimise, mitigate and/or compensate for adverse effects and maximise development benefits;
- Systematically consider the impact of climate change on the sustainability of investment projects and the contribution of projects to global greenhouse gas emissions;
- Delineate the roles and responsibilities of the Bank and its borrowers or clients in implementing projects, achieving sustainable outcomes, and promoting local participation; and
- Assist regional member countries and borrowers/clients in strengthening their own safeguards systems and their capacity to manage E&S risks.

Table 2.3: AfDB Operational Safeguards OS1-5

Operational Safeguard	Description
OS 1: <i>Environmental and social assessment</i>	This overarching safeguard governs the process of determining a project's environmental and social category and the resulting environmental and social assessment requirements
OS 2: <i>Involuntary Resettlement: Land Acquisition, Population Displacement and Compensation</i>	This safeguard consolidates the policy commitments and requirements set out in the Bank's policy on involuntary resettlement and incorporates a few refinements designed to improve the operational effectiveness of those requirements. It includes comprehensive notions of livelihood and assets, accounting for their social, cultural, and economic dimensions. It also adopts a definition of community and common property that emphasizes the need to maintain social cohesion, community structures, and the social interlinkages that common property provides. It furthermore stresses the importance of improving living conditions for PAPs through a Livelihood Restoration programme.
OS 3: <i>Biodiversity and Ecosystem Services</i>	This safeguard aims to conserve biological diversity and promote the sustainable use of natural resources. It also translates the commitments in the Bank's policy on integrated water resources management into operational requirements.
OS 4: <i>Pollution Prevention and Control, Greenhouse Gases, Hazardous Materials and Resource Efficiency</i>	This safeguard covers the range of key impacts of pollution, waste, and hazardous materials for which there are agreed international conventions, as well as comprehensive industry-specific and regional standards, including greenhouse gas accounting, that other multilateral development banks follow.
OS 5: <i>Labour Conditions, Health and Safety</i>	This safeguard establishes the Bank's requirements for its borrowers or clients concerning workers' conditions, rights and protection from abuse or exploitation. It also ensures greater harmonization with most other multilateral development banks.

2.10.4 Environmental and Social Assessment Procedures (ESAPs)

The Bank's ESAPs details the specific procedures that the Bank and its borrowers or clients should follow to ensure that Bank operations meet the requirements of the operational safeguards (OSs) at each stage of the Bank's project cycle.

Its adoption and implementation enhance the E&S performance of the Bank's operations and improve project outcomes. The ESAPs will help to improve decision-making and project results by ensuring that Bank-financed operations conform to the requirements laid out in the operational safeguards (OS) and are thus sustainable. The ESAP describes how the Bank and its borrowers should work together to ensure that environmental, climate change and social considerations are integrated into the project cycle from country programming to post completion. It represents a coordination mechanism between the Bank, relevant government agencies and private sector entities and plays an important role in building the environmental, social and climate

change management capacity of the project's executing agency. The Environmental and Social Assessment procedures apply during the entire project cycle, with differentiated tasks to be performed, roles and responsibilities for the Bank and its borrowers and clients.

Also, the Bank has an integrated system which will be used to ensure its E & S requirements are incorporated effectively into the whole programme cycle, i.e., Integrated Safeguards Tracking System (ISTS). The ISTS constitutes an integral part of the ESAP. A summary of the key requirements of the ESAP during each project stage is presented in Table 2.4.

Table 2.4: Summary of the AfDB Project Cycle and E & S requirements

AfDB Project Cycle	Details
Country Programming Phase	<ul style="list-style-type: none"> During country programming, the key task is to develop and update baseline data on RMCs' E&S components, policies, programs, and capacities to better integrate E&S dimensions into lending priorities. These are the responsibilities of the Bank's Sector Departments and Regional Departments.
Project Identification Phase	<ul style="list-style-type: none"> At the project identification phase, the screening exercise focuses on the E&S dimensions of a project to categorize it in one out of four categories based on the potential adverse E&S impacts of the project. These tasks will be carried out by the Bank in collaboration with the clients.
Project Preparation Phase	<ul style="list-style-type: none"> During project preparation, the scoping exercise helps to define the scope of the Environmental and Social Assessments (ESA) to be completed by the Borrower based on the project category, with the assistance of staff from the operational departments. The preparation of these assessments including the development of management plans and systems requires consultations with primary and secondary stakeholders. Once ESAs are finalized, the review process allows operational departments to ensure that Bank's vision, policies, and guidelines were adequately taken into account in project design and implementation. The clients/borrower will be in charge of the preparation of the required studies and plans while the Bank will be responsible for reviewing and validating the studies and plans.
Project Appraisal Phase	<ul style="list-style-type: none"> During the appraisal phase, ESIA Summaries shall be reviewed and cleared by the Safeguards and Compliance Department (SNSC). The procedures require the public disclosure of summaries in accordance with specified deadlines. <ul style="list-style-type: none"> All Category 1 operations for private sector shall be disclosed for 60 days before Board deliberations while other Category 1 projects for public sector require a 120 day disclosure period before board consideration.

AfDB Cycle	Project	Details
		<ul style="list-style-type: none"> ○ All category 2 operations shall be disclosed for 30 days before Board deliberations. RAAMP is categorized as category 2 and will therefore require 30 days disclosure period. • The Bank will be responsible for conducting site visits and verification activities with respect to the studies, plans, and systems developed by the borrowers.
	Project Implementation Phase	<ul style="list-style-type: none"> • At the project implementation phase, the Borrowers shall ensure the implementation of E&S management plans developed to address adverse impacts, while monitoring the project impacts and results. • The Bank's operational staff shall supervise the Borrowers' work and verify compliance through supervision missions and/or E&S audits, whenever necessary. • Audits are undertaken during the completion phase, and post evaluations shall also aim to assess the E&S sustainability of the results.

2.10.5 Integrated Environmental and Social Impact Assessment (IESIA)

Guidance Notes

The IESIA Guidance Notes provide technical guidance to the Bank's borrowers or clients on standards on sector issues or on methodological approaches clients or borrowers are expected to adopt to meet OS standards. The Integrated Environmental and Social Impact Assessment (IESIA) Guidance notes provide a systematic process for addressing projects' E&S impacts with a clear understanding of the specific sector characteristics.

The IESIA Guidelines' major objective is to provide reference material to the staff of the Bank and RMCs on how to adequately consider crosscutting themes while assessing the E&S impacts of a project. Moreover, the IESIA Guidelines can greatly assist in the project design, as many potential adverse impacts can be avoided or mitigated by modifying or adding certain project components to the initial design. As well, improvements in the project design can enhance several beneficial impacts at a minimal cost. Therefore, the IESIA Guidelines provide guidance on how to adequately consider the Bank's priority crosscutting themes in both the preparation and assessment phases. Thus, the staff of the Bank and RMCs should refer to the IESIA Guidelines from the beginning of the project cycle to the end.

The IESIA Guidance notes complement the guidance and formats provided in ESAP and provide guidance to RMCs when undertaking E&S Assessments for Bank-financed projects/programs. It will also be used by the Bank's Operational staff in reviewing and clearing these studies and in project supervision. The provision of high-quality technical guidance is key to ensuring effective compliance, capacity and ownership of the ISS for Bank staff and borrowers alike.

The IESIA Guidance Notes are presented in three standalone volumes that provide guidance in the three essential components of:

- i. the Environmental and Social Assessment process,
- ii. specific topics and operational safeguard requirements, and
- iii. technical guidance on key sectors and subsectors that have been proposed by operational departments as areas where guidance is needed.

2.10.6 AfDB Project Categorization Process

The ESAP also includes procedural requirements such as the categorization of projects, disclosure and monitoring of projects during implementation and operation. The assigned AfDB project category will be aligned to the project category assigned by the existing country systems in Nigeria and it will not be less than the assigned project category in country.

All projects eligible for RAAMP intervention shall be structured to meet the country system as well as the AfDB ISS requirements. Also In accordance to AfDB ISS, each sub-project will undergo E&S appraisal in order to determine whether the project can be financed as well as ensuring that the E&S considerations are incorporated effectively in the planning, implementation, and operation of the sub-projects. Each sub-project will undergo **initial E&S screening** and be categorized accordingly at the initial stage of the project cycle, to determine the nature and level of E&S investigations, information disclosure and stakeholder engagement required. The categorization shall be done according to the guidance stipulated in the AfDB ESAPs.

Based on the categorization, the sub-projects will then be subjected to an appropriate E&S assessment and mitigation measures will be formulated to ensure E&S considerations are incorporated in the course of implementation. Projects with high environmental and social impacts will be screened out. A summary of the AfDB's project categorization process (detailed in the ESAP) is set out in Table 2.5.

Table 2.5: AfDB Project Categorization Process

AfDB Project Category	Description
Category 1	<ul style="list-style-type: none"> Projects likely to cause significant E&S impacts. Category 1 projects are likely to induce significant and/or irreversible adverse environmental and/or social impacts, or to significantly affect environmental or social components that the Bank or the borrowing country considers sensitive.
Category 2	<ul style="list-style-type: none"> Projects likely to cause less adverse E&S impacts than Category 1. Category 2 projects are likely to have detrimental site-specific environmental and/or social impacts that are less adverse than those of Category 1 projects. Likely impacts are few, site-specific, largely reversible, and readily minimized by applying appropriate management and mitigation measures or incorporating internationally recognized design criteria and standards.
Category 3	<ul style="list-style-type: none"> Projects with negligible adverse E&S risks Category 3 projects do not directly or indirectly affect the environment adversely and are unlikely to induce adverse social impacts. They do not require an E&S assessment. Beyond categorization, no action is required. Nonetheless, to design a Category 3 project properly, it may be necessary to carry out gender analyses, institutional analyses, or other studies on specific, critical social considerations to anticipate and manage unintended impacts on the affected communities.
Category FI	<ul style="list-style-type: none"> Projects involving lending to financial intermediaries (FI). Category FI projects involve lending to financial intermediaries that on-lend or invest in sub-projects that may produce adverse E&S impacts. FIs include banks, insurance, reinsurance and leasing companies, microfinance providers, private equity funds and investment funds that use the Bank's funds to lend or provide equity finance to their clients.
Subcategory FI-A	<ul style="list-style-type: none"> The financial intermediary's portfolio is considered high risk, and it may include sub-projects that have potentially significant adverse environmental, climate change, or social impacts and that are equivalent to Category 1 projects.
Subcategory FI-B	<ul style="list-style-type: none"> The financial intermediary's portfolio is deemed to be medium risk, and may include sub-projects that have potential limited adverse environmental, climate change, or social impacts and that are equivalent to Category 2 projects
Subcategory FI-C	<ul style="list-style-type: none"> The financial intermediary's portfolio is considered low risk and includes sub-projects that have minimal or no adverse environmental or social impacts and that are equivalent.

2.11 E&S Assessment of Nigerian Policies and Legislations and AfDB Safeguard Systems

The Nigerian E&S Safeguards system addresses most of the key elements of E&S Safeguards except for the preparation of ESMF for projects involving multiple subprojects, vulnerable groups and the required differentiated treatment of

vulnerable groups which are adequately addressed by the AfDB safeguard systems.

Apart from the gaps highlighted above, the main challenge facing E&S safeguarding in Nigeria is the overlapping functions of different agencies in relation to enforcement of these policies, guidelines and legislative provisions. Thus, as part of this ESMF and in order to support the due diligence process, to avoid causing harm and to ensure consistent treatment of E&S issues across the sub-project intervention areas, institutional capacity strengthening, and funding will be recommended as part of the ESMF.

To ensure E&S safeguard during sub-project implementation, both the Nigerian and AfDB E&S safeguard systems will be implemented. However, in the event of divergence and gaps the AfDB safeguard system with the more stringent requirement will take precedence.

Table 2.6. Benchmarking of Nigerian Legal Provisions and AfDB ISS specifications

Key Element	Nigerian Provisions	AfDB Integrated Safeguard System	Provision to be adopted by RAAMP
ESMF for Projects involving multiple sub-projects.	Not a national requirement	OS 1: Environmental and social assessment	OS 1: Environmental and social assessment
Screening	EIA Act Cap E12 LFN 2004	OS 1: Environmental and social assessment	OS 1: Environmental and social assessment
Scoping	EIA Act Cap E12 LFN 2004	OS 1: Environmental and social assessment	EIA Act Cap E12 LFN 2004
Environmental and Social Impact Assessment Guideline	EIA Procedural Guidelines, 1995	IESIA Guidance Notes ESAP	EIA Procedural Guidelines, 1995 and IESIA Guidance Notes ESAP
Environmental Categorization	EIA Procedural Guidelines, 1995 Categories I, II & III	OS 1 – Categories 1, 2, 3, and FI for operations involving lending to financial intermediaries.	OS 1 – Categories 1, 2, 3, and FI for operations involving lending to financial intermediaries.
Environmental and Social Assessment	EIA Act Cap E12 LFN 2004	OS 1: Environmental and social assessment	OS 1: Environmental and social assessment
Environmental and Social Management Plan	EIA Act Cap E12 LFN 2004	OS 1: Environmental and social assessment	OS 1: Environmental and social assessment
Consultation and Participation	EIA Act Cap E12 LFN 2004	OS 1 (include provision of IESIA	OS 1 (include provision of IESIA

Key Element	Nigerian Provisions	AfDB Integrated Safeguard System	Provision to be adopted by RAAMP
		Guidance Notes on consultation)	Guidance Notes on consultation)
Involuntary Resettlement	<ul style="list-style-type: none"> - Land Use Act CAP L5 LFN 2004 - Acquisition of Land Access Rights for Electricity Projects Regulations, 2012 	OS 2: Involuntary Resettlement: Land Acquisition, Population Displacement and Compensation	OS 2: Involuntary Resettlement: Land Acquisition, Population Displacement and Compensation
Compensation	Cash compensation is generally made based upon market value. Whilst in principle there is allowance for in-kind compensation or replacement of assets, cash compensation is common practice	OS 2: Affected Persons are compensated for all their losses at full replacement cost. They can be offered a range of different compensation packages, resettlement assistance & livelihood improvement options.	OS 2: Affected Persons are compensated for all their losses at full replacement cost. They can be offered a range of different compensation packages, resettlement assistance & livelihood improvement options.
Pollution Prevention and Control	National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes) Regulations, 1991; and National Environmental (Surface & Groundwater Quality Control) Regulations 2011	Operational safeguard 4 – Pollution prevention and control, hazardous materials and resource efficiency	Operational safeguard 4 – Pollution prevention and control, hazardous materials and resource efficiency
Greenhouse Gases	National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes) Regulations, 1991	Operational safeguard 4 – Pollution prevention and control, hazardous materials and resource efficiency (Special screening for GHGs is also considered under OS 1)	Operational safeguard 4 – Pollution prevention and control, hazardous materials and resource efficiency (Special screening for GHGs is also considered under OS 1)
Waste and Hazardous Materials	- National Environmental Protection (Management of Solid	Operational safeguard 4 – Pollution prevention and control,	Operational safeguard 4 – Pollution prevention and control, hazardous

Key Element	Nigerian Provisions	AfDB Integrated Safeguard System	Provision to be adopted by RAAMP
	and Hazardous Wastes) Regulations, 1991 -Harmful Wastes (Special Criminal Provisions etc.) Act CAP HI LFN 2004	hazardous materials and resource efficiency	materials and resource efficiency
Resources and Conservation	Natural Resources Conservation Act CAP 349 LFN 1990	Operational safeguard 3: Biodiversity and Ecosystem Services	Operational safeguard 3: Biodiversity and Ecosystem Services
Labour Conditions	Employee Compensation Act, 2010 Labour Act, 1990	Operational safeguard 5 – Labour conditions, health and safety	Employee Compensation Act, 2010 Labour Act, 1990
Health and Safety	Factories Act (CAP F1), 2004	Operational safeguard 5 – Labour conditions, health and safety	Operational safeguard 5 – Labour conditions, health and safety
Natural Habitat and Biodiversity	Forestry Law CAP 51 LFN 1994 Endangered Species (Control of International Trade and Traffic) Act No. 11 of 1985. Natural Resources Conservation Act CAP 349 LFN 1990	Operational safeguard 3: Biodiversity and Ecosystem Services	Operational safeguard 3: Biodiversity and Ecosystem Services
Gender	National Gender Policy 2010	Special consideration is given to the needs and rights of women. In the context of gender vulnerability, the client must consider the social and political constraints and barriers that women may face.	There is the need for the project consider the implications of the AfDB Gender Marker System and how to design and implement an appropriate Gender Action Plan for the sub projects
Vulnerable Groups	Some Nigerian policies address the needs of vulnerable people, such as the Gender Policy, Child Act or NEEDS framework. However, there are no specific provisions related to E&S Assessment.	OS 1: Environmental and social assessment. Special attention is given to vulnerable groups.	OS 1: Environmental and social assessment. Special attention is given to vulnerable groups.

Key Element	Nigerian Provisions	AfDB Integrated Safeguard System	Provision to be adopted by RAAMP
Differentiated Measures for Vulnerable Group	No provisions	Provision for differentiated measures for inclusion	(Provision for differentiated measures for inclusion)
Environmental Monitoring	EIA Act Cap E12 LFN 2004	ESAP	ESAP
Disclosure and Access to Information	EIA Act Cap E12 LFN 2004	OS 1: Environmental and social assessment	OS 1: Environmental and social assessment

A comprehensive benchmarking exercise, comparing the Nigerian regulations to the AfDB OS2 is presented in Chapter 7 of this ESMF.

2.12 Disclosure Requirements

Disclosure of information will enhance governance and accountability specifically with respect to strengthening of monitoring indicators to facilitate the monitoring of compliance with the agreements and assess impact on outcomes. The disclosure requirements of the Nigerian FMEnv and the AfDB are presented in Table 2.8. Disclosure requirements for AfDB's Category 1 projects are longer than FMEnv disclosure period of 21 days.

Table 2.7: Disclosure requirements of the FMEnv and AfDB

Entity	Project Type	Project Category	Disclosure documents	Disclosure Requirements*
FMEnv	Public and Private sector	Category 1 & 2	ESIA	21 working days with electronic and print media adverts
AfDB	Public Sector	Category 1	ESIA/ESMP, ARAP or FRAP	120
		Category 2	ESMP	30
	Private Sector	Category 1	ESIA/ESMP, FRAP	60
		Category 2	ESMP	30

CHAPTER THREE: PROJECT DESCRIPTION

3.1 Introduction

This chapter describes the key anticipated components and planned activities of the RAAMP sub-projects including design and procurement requirements, project overview, associated facilities and project components as well as construction activities.

The Nigeria road network is relatively dense consisting of about 194,000 km of roads. This includes 34,000 km of federal roads, 30,000 km of state roads and 130,000 km of registered rural roads. The road density is about 0.21 km of roads per square kilometre. In spite of the relatively high road density, the rural accessibility index for Nigeria (defined as the proportion of the rural population living within 2 kilometres away from an all-weather road) is low, at only 25.5 percent, leaving about 92 million rural dwellers unconnected. Rural access also improves the agro economic potentials and support food security as more products will get to the market before they become bad. These considerations demand the expansion and improvement of rural road network, and, also, conservation of rural road/transport assets.

The overall goal for the Rural Access and Agricultural Marketing Project (RAAMP) is for employment generation, improve the competitiveness of commodity value chains, and increase incomes of the commodity value chain actors through improved rural road infrastructure, agricultural processing and marketing systems.

Furthermore, an improved rural access will enhance the agricultural potentials and marketing opportunities for the agrarian rural communities in Nigeria and, by extension, help in the improvement of livelihoods of the rural population.

3.2 Project Overview

The development objective of the proposed Rural Access and Agricultural Marketing Project (RAAMP) is to improve rural access and agricultural marketing in selected participating states while strengthening the financing and institutional base for sustainable management of the rural and state roads network.

The RAAMP program includes a number of components with sub components as set out in Table 3.1.

Table 3.1. RAAMP components and subcomponents

Component	Sub component
Component 1: Rehabilitation/Upgrading of Rural Infrastructure	Subcomponent 1.1 – Rehabilitation/Upgrading of Access Roads and River Crossings:
	Subcomponent 1.2 - Rehabilitation/Upgrading of Markets and Processing Facilities
Component 2: Capacity Building for Value Chain Actors	n/a
Component 3: Project Management and Coordination	n/a

Component 1: Rehabilitation/Upgrading of Rural Infrastructure

This component entails the rehabilitation/upgrading of existing rural access roads and river crossings and establishment of pilot agro-logistics hubs at strategic locations in six participating states. The component is made up of two sub-components namely

- (i) Rehabilitation/Upgrading of access roads and river crossings;
- (ii) Rehabilitation/Upgrading of Markets and Processing Facilities.

Subcomponent 1.1 – Rehabilitation/Upgrading of Access Roads and River Crossings

The project will link selected rural communities and farms in prioritized agro-logistic areas, through the rehabilitation of approximately up to 1690km to all-weather access roads standard and a number of river crossings (the number is to be determined during detailed project design). Based on the amount of rainfall received in the states of intervention and traffic volume, the standard of road is a low volume sealed road (in Cross River, Anambra and Benue States) and lateritic earth (in Taraba, Gombe and Borno States).

The objective is to provide all-weather access to connect rural communities to local agricultural markets, and agro-logistics hubs in order to improve rural transportation and reduce the cost of transporting agricultural products to markets, and also post-harvest losses. The project will also provide Technical Assistance support for development and operationalization of sustainable

road maintenance and road safety strategies including the formation and equipping community labour-based road maintenance gangs.

Subcomponent 1.2 - Rehabilitation/Upgrading of Markets and Processing Facilities

The focus will be on upgrading the existing traditional markets into agro-logistics centers/hubs. The rural agro-logistics centers/hubs will be provided at two levels. Lower level centers at primary markets close to the small family farms, hereinafter, called "primary agro-logistics centers", serving as points for aggregation, storage and marketing consumables, as well as a digital platform for exchange of commodities and market information. Medium level centers/hubs serving cluster of agro-logistics areas located close to processing plants and consumer markets, hereinafter called "primary agro-logistics centers". To ensure delivery of agricultural services that require sufficient scale, the secondary agro- logistic centers also provide a platform/space for delivering agricultural inputs, agricultural technology, credit, veterinary services, market and production information, etc., while the facilities and services will be provided by the private sector.

The project will finance the establishment of pilot agro-logistics hubs and model primary markets at strategic locations within the prioritized agro-logistic areas in each State. Facilities to be provided include internal/peripheral roads, and site and services, including levelling and paving, perimeter fencing, offices, market sheds, storage facilities, processing equipment and power connection, water and sanitation; as well as connection to high speed internet. The number and locations, as well as the model facilities to be provided at the pilot agro-logistics centers shall be determined by the state level agro-logistics studies. The rural logistics hubs will serve as satellites to higher level logistics parks and be designed to link to major transport corridors.

The Project will also finance an agro-logistics chain study (for States which do not already have one) to build on the rural road periodization study already undertaken, in order to confirm the agricultural products in which the individual state has comparative marketing advantage and assess key value chain issues, including the exact location and infrastructure needs within the hubs and model markets taking into account proximity of the hubs to the small family farms and market aggregation; and develop marketing and private investment attraction strategies.

To cover sub-components 1 and 2, several roads within each of the 6 states have been identified as eligible roads, the final selection of the main roads to

benefit from RAAMP will be done from these eligible roads. The list of eligible roads is presented state by state.

Table 3.1: List of Eligible roads in Taraba State

S/N	ROAD CODE	ROAD NAME	LENGTH (KM)	LOCAL GOV'T AREA
1	AK. 101	Main road -Alin Gora - Tau	28.80	Ardo/Kola
2	KL. 102	Bandawa-Munga Dosso - Munga Lelao	24.4	Karim/Lamido
3	KL. 104	Mutum Daya - Zelani	17.0	Karim/Lamido
4	LA. 105	Mayo-Lope -Kunini	22.0	Lau
5	JG. 201	Jalingo - Wuro Musa	10.0	Jalingo
6	YR. 205	Pantisawa - Kassa	18.20	Yorro
7	ZG. 207	Zing - Monkin	18.8	Zing
8	ZG. 210	Zing - Lamma	20.70	Zing
9	GS. 303	Sabon Gida -Nanguru-Yaku Shamaki	10.0	Gassol
10	BL. 304	Pamanga - Dakka	32.90	Bali
11	WK. 404	Wukari - Numa – Abyei'-ban	18.0	Wukari
12	IB. 402	Sarkin Kudu -Dampar	57.80	Ibi
13	TK. 502	Pyeri – Sabon Gida- Yukuben	28.0	Takum
14	TK. 501	Tati - Kpashimbe	9.80	Takum
15	US. 505	Rufu – Kpakya	15.50	Ussa
16	US. 504	Takum – Fikyu	23.0	Takum/Ussa
17	DG. 506	Kumbo/Nwuhwa- Ude - Ruwan Sanyi	32.70	Donga
18	DG	Donga-Tunari	35.0	Donga
19	SD. 604	Lekitaba – Kakara	11.20	Sardauna
20	SD. 601	Gembu - Ngeah - Vakude	12.60	Sardauna
21	KM. 606	Nyido-Manya	32.70	Kurmi

S/N	ROAD CODE	ROAD NAME	LENGTH (KM)	LOCAL GOV'T AREA
22	GK. 608	Gayam - Shunam	20.90	Gashaka
		GRAND TOTAL	500KM	

Table 3.2: List of Eligible roads in Cross River State

S/N	Road Code	Road Name	Length (km)
1	OG103	Fsc-Ukpagada - Ibil - Ekwarror - Mbok junction	10.2
2	BR103	Bekwara-Oweche-Bewo	6.0
3	BR105	Nyanya Ulim-Otukpuru-Afaa	4.7
4	OG105	Ntunop-Esham-Nwang with a Spur	22.4
5	OK207	Shikpeshe-Obudu	3.3
6	OK206	Sankwala-Basan	10.3
7	OD207	Obudu-Dam	5.0
8	OD210	Ukwuel-Obudu-Meat factory	5.0
9	OD205	Highway-Ngokpu	9.5
10	IK304	Mankono - Otere	5.5
11	IK306	Nde - Etanwan	6.8
12	IK305	Nde - 3 Corners - Etakor	16.9
13	ET303	Etomi - Effraya	4.4
14	IK301	Atimaka - Yala Nkum	18.5
15	BK301	Kakwagom - Asaba - Egoja Ndim	7.7
16	OR402	Nysc-Ogada	6.1
17	AB402	Adim-Ebom-LowerIgonigoni-Upper Igonigoni	20.0
18	YK405	Ugep-Usumurtong	8.3
19	ON502	Akpap-Ifako-Ekenghe	17.0
20	ON503	Ata-Ekpene Obom Afiisong-Ukpi	11.5
21	CM605	Onoyom Mbuk	0.4
22	CM604	Ikot Ekpo Okon - Ikot Nkebere	2.2
23	CM603	Edim Akimbri-Ikwo Nkibong-Dr Edem-Ferma Market-Swamp-Presbyterian church	5.6
24	BS702	Ikot Okon- Ekpritwong	1.5
25	AY703	Urua Ntifot Market-Esuk-Ewa okon	18.5
26	AY702	Esuk mba Market-Ikong - Ikot Edem odo	10.7
		Total Length	238

Table 3.3: List of Eligible Roads in Anambra

S/N	<u>Road Name</u>	KM
1	Oromaetiti - Umuidiora - Umuikwu - Onono Rd	8.00
3	Okpamgbume farm settlement, Ezi to Anam to Oromaetiti	7.50
4	Umuenwelum from Nkwo-Oji to Obor Farms	10.00
5	Umuikwu via Umueze Anam - Nzam Road to Onono	8.00
6	Nzam - Inoma Road	18.00
8	Onono Anam Farm settlement	12.00
10	Ezi - Anam Ifite - Ogwari pumping station	10.00
11	Onitsha / Adani Federal road junction, Omor - Umumbo Road	17.50
13	Omasi Agu - Excel Farm	9.00
14	Nkwo-Nando market - Achara Isu Junction Rd	3.20
16	Umuatulu Umuleri - Nando - Ikem - Onitsha / Adani Road Junction	10.00
19	Omor - Enugwu Otu Road	6.00
20	Omasi - Enugwu Otu Road	20.00
21	Umueje Ponton River Port to Nkpunado	15.00
22	Anambra River Port Aguleri out - Enugu out - Nkpunando Farm Settlement	20.00
27	Olu Ika - Enugu Otu Road	12.00
28	Ochudo enugu otu road	10.00
29	Ovi Road - Eziagulu Aguleri	4.00
30	Ifite by Roman Foods Junction - Ezi Agu Ifite Rd	1.00
31	Aguleri Junction - Omor - Ayioji Rd	6.00
32	Ugwu-Igbakwu - Enugu Otu Rd	5.00
38	St Christopher Rd - Odonjosi 3-3 Onitsha	3.00
42	Ezi - Beigwe Junction - Nawgu - Isu -Ngboku- Spur To Uru Rd	10.40
43	Achalla - Umuogbe -Aguezu -Ugbene	19.00
45	Ozudaa - Youth Development Centre - Amanuke - Ugbene Rd	18.00
46	Ugbenu-Mgboko Rd	10.00

S/N	<u>Road Name</u>	KM
48	Awba Ofemili from Agunenu to Ozume Farm to Omor	12.50
49	Uchakwu - Iyinta Road, Achalla	10.00
52	Farm road Amanuke	9.00
53	Chuwuneye mill - Ezike - Akpulanu Across Okoye Swamp - Awba Ofemili	10.00
55	Village Center - Uno Iloka - Ofufu River, Awba Ofemili	11.00
61	Ihuagu - Obaofemili Road	15.00
62	Mgbakwu-Ebenebe Rd	17.00
63	Ugbene - Amanuke - Urum - Isuanocha - Mgbakwu Rd	18.00
64	Okpuno - Ezinifite Hall - Okochime -Obibia Stream - Mgbakwu Rd	10.00
65	Ndiora-Ntoko-Ndikpa Isiagu Road	14.00
68	Umuawulu - Awa - Amaetiti to Mgboko Rd	25.00
69	Haba/Mgboko Farm Settlement Umuenu-Enugu Rd, Uwuawulu	5.00
70	Frankster Comprehensive School Road, Maryland Layout, Amawbia.	4.00
71	Alex Ekweme/State Secretariat - Okpuno Okochi - Ifite Rd	6.50
72	Nwafia Street, Umueze, Amawbia	2.00
73	Maryland Udu Street- Maryland - Amawbia	3.00
74	Omogho - Obinikpa-Nike - Umuochu - Okpaeze Rd with Spur to Novtec Farm	10.00
75	Ndiowu - Anumkpu - Ihueze with spur to Ndikelonwo rd	7.50
76	Ugwu Ovu, Enugu Nanka	15.70
77	Ogboji - Agbudu - Oneh - Achina Rd	15.00
78	Enugwu - Umuonyia - Umuomaku Rd	4.50
79	Okpobe Umuikpa Umuokpulukpu Nalda Oil Palm Plantation Umuomaku	12.00
80	Ibighibu Cooperatve Farm Road, Ibughibu Cassava/Oil Palm Farm Road Lolonwu Umuchu	10.00
81	Nwafija - Umuoma-Umuezeogbu - Umunebo -Ogbunka - Ogbunabo Rd	15.00
82	Nwafija Ogbunka Rd	5.00
83	Umunobe - Eziagu - Odo Achala Rd	8.00

S/N	<u>Road Name</u>	KM
84	Owerre Ezukalla - Awlaw - Enugu State Border	5.20
85	Akpu - Umuezeilo - Ikpankwa- Farm Rd	7.00
86	Umueze - Eziagu - Isi Ulo - Nwafija Rd	8.00
87	Umueze - Umumomaku - Umuchu Rd	5.00
88	Amihie Umuchu-Umunambu-Eke Market Rd	7.00
89	Umualeke - Amahkwu Rd	5.00
90	Amankwu - Nkwere Mmiri -Agbudu	6.00
91	Nwagwazi-Akabo Farm Road Umueze Uga	8.00
92	Akpo Junction - Uhuala - Ogboji	3.00
93	Isioji - Akpo - Agbelu - Ogbo - Achina Rd	3.00
94	Ezeigbo Junction - Uhuhu - Esingbo - Akabaubahi Rd	6.00
95	Mbosi – Nmuka - Umuezeogu Rd	8.50
100	Osomala – Obeagwe - Ntaja - Akili Ogidi - Ogwuikpele	13.90
101	Amiyi Junction - Umuzu - Ulasi	18.00
102	Umuzu Ogbaru Road	20.00
106	Abor-Atani-Amiyi Feeder Road Ogaru	6.00
111	Center Nnokwa - Idemili Nnokwa - Ogunzele Awka Etit - - Eke Awka Etit	15.00
112	Eke Nnokwa - Isimbede Nnokwa - Ogunzele Etit - Eke Awka Etit Road	3.00
113	Ilo Enuagu Road Umezeochua Umudioka	6.00
114	Obinagu - Makwun - Eke Market	2.50
115	Okwolisa - Amorgbue - Ogbeoweri - Anusi - Okoma- Akwasi	4.20
116	Obinagu - Ezeiweka	1.50
121	Nkwo Adazi Enu - Mbowe Akwaeze Rd	3.00
122	St Jude Junction Umuogu - Uru Ezeama - Alor Rd	4.30
123	Ezeumuanumanu Junction - Alor Rd	1.60
124	Dim Nam Junction - Neni Adazi - Nkpuota Neni	5.00
	<u>Total Length (km)</u>	<u>723</u>

Table 3.4: List of Eligible Roads in Borno State

S/no	L.G.A	Road Name	Road ID	Length (KM)
1	Jere	Gongulon –Zabarmari	JR101	6.1
2	Jere	Muna-----Dusman	JR102	11.8
3	Biu	Biu – Kabura	BU201	1.4
4	Bayo	Buryel-Jaragwal-Gwaljara-Kunun Gayya-Jaradali-Zange-Yalwa-Laro-Chibra-Sarkadiya Road	BY202	65
5	Shani	OffmainRoad -Kubodaino(Gasi HQ)	SH203	17.4
6	Shani	Kimtir.....Pajala	SH204	5.3
7	Shani	Bargu – Kubo	SH205	8
8	Shani	Mainroad-Burashika-Gundiri	SH206	3
9	Kwaya Kusar	Gussi----Kutuki - Dayar - Dzalhu	KK207	9.9
10	Kwaya Kusar	Wada – Kogu	KK208	6.7
11	Kwaya Kusar	K/Kusar –Jaffi	KK209	7.1
12	Askira Uba	Uba – Muffa	AU304	4.9
13	Askira Uba	Uba - Tilban – Gusara	AU305	6.3
14	Askira Uba	Wandio - Chul - Mussa--Huyum	AU306	29.1
15	Askira Uba	Lassa - Dille - Huyum - Mussa	AU307	18.5
16	Askira Uba	Lassa – Tampul	AU308	4.1
17	Askira Uba	Askira – Ngohi	AU309	28.8
18	Askira Uba	Sabon Gari – Njoma	AU310	2.9
19	Hawul	Manjaffa – Kwajjafa	HW301	12.1
20	Hawul	Yimirshika ---Kida---Bwalikato	HW302	4.7
21	Hawul	Tashan Alade---Debro..... Ngulde	HW303	11.5
22	Dambo	Azir---Kauchi----Wobi	DB311	18.3
23	Chibok	Chibok – Kaltikare	CH312	18.2
24	Chibok	Wantagu – Bolagyan	CH313	5.9
25	Gubio	GubioArdimini	GB401	21.6
26	Gubio	Gubio ...Ngetira--Jilli	GB402	36.3
27	Magumeri	Magaumeri ...Gajiganna	MM403	32.7
28	Magumeri	Magumeri - Ngaura - Karizoroma Lawanti	MM404	14.2
29	Magumeri	Magumeri- Changowa-Ngaura	MM405	8.5
30	Magumeri	Magumeri-Awanari-Abatcha Fandiri	MM406	14.1
31	Magumeri	Magumeri - Kachallari	MM407	9
32	Kaga	Benisheik - Wajuro - Guwo - Dongo	KG501	33
33	Kaga	Tomsu Kawu - Burguma	KG502	21.6
34	Kaga	Wasaram - Kudowu - Dongo	KG503	18.1
				516.1

Table 3.5: List of Eligible Roads in Benue State

S/N	Road Name	LENGHT
1	Pose - Ortese Ugee – Ashibe - Adiwa Tyowanye	22.4
2	Awume - Ajegbe – Ondo – Ejule - Onyagede	18.3
3	Akpagher – Ikpengegh Road	13
4	Ekeh Olengbecho – Ogodumu – Ojigo Ojapo	14.8
5	Tse – Agberagba – Tyough Gbanya – Selagi Road	18
6	North Bank – Zongo – Anter	11
7	Tyowanye – Tomanyiin – Uga	19.8
8	Naa – Tyokase – Uka Road	12.7
9	Obarike – Ameke – Ijegwu	20.3
10	Ujegbe – Otumche – Ukpila Road	17
11	Ugbokpo – Adijah – Ijaha – Ochumekwu – Bini – Akpanta – Ugbobi – Ikobi	17
12	Utonkon – Ujol – Ikpafri – Wrukpo	10
13	Oshigbudu – Ogbaulu – Odugbeho	21.2
14	Gbagir – Chito	12.5
15	Olakpoga – Ipepe – Iwili	20
16	Ugba – Asom – Akaa – Sakera – Agbungu Road Yonov Ward	16.6
17	Ikowe – Aye – Erlia	8
18	Annune – Ikyaior – Agunogo Market	15
19	Agagbe – Abian – Gbaji	13
20	Gwarche – Kontien – Avande Road	15.4
21	Shamyough – Tomatar – Aperu	20.6
22	Jiwunde – Gbache – Mbayom	10
23	Orokam – Ipole – Adupi – Okalegwu – Ade	16.3
TOTAL		362.9

Table 3.6: List of eligible roads in Gombe State

S/No	Road Name	LGA	Distance (km)
1	Mararhaba Damba Dukku-Damba Dukku	Dukku	6.02
2	Tumpure-Gasakahe Daminiya	Dukku	21.0
3	Tumpure-Zangala birni Mamman Kamo	Dukku	11.8
4	Gadum Duggi-Kari-Wawa	Dukku/funakaye	31.8
5	Fha Qtrs-Shango Sarkin Yaki Manori Ibba-Abuja bula	Kwami	15.0
6	Bojude Dirriwuro Bundu	Kwami	8.0
	Mararhaban Tappi-Tappi Shuwari	Kwami	4.0
8	Sabon Garin Kwami- Yaya Adda	Kwami	6.4
9	Birin Fulani Nahuta Ndaba- Nafada	Nafada	29.0
10	Barwon Nasarawo-Wakaltu Peshingo	Nafada	9.0
11	Bajoga-Bakari-Zagaina Magaba Madakiri	Funakaye	10.0
12	Bajoga-Garin Alkaki Munda	Funakaye	10.7
13	Danjola Wakaltu	Funakaye	2.9
14	Wuro Dole Saleri Wakaltu	Funakaye	7.1
15	Tilde-Siddikiyyo	Funakaye	5.0
16	Dukul-Gafara shani	Kwami	8.0

17	Kupto Kuka Bakwai jagabari Mangada	Funakaye	22.6
18	Abuja Bula Jamji	Akko/kwami	12.7
19	Bojude Jore	Kwami	15.0
20	Jakkum Gode	Dukku	10.0
21	Dadin Kowa Garin Bukar-kurjale	Yamaltu deba	16.32
22	Jagali Garin Nabawa Jangargari-Garin Bukar	Yamaltu deba	37.6
23	Spur Rd off Shinga/Gwani Dukul Tera	Yamaltu deba	1.8
24	Shinga Tsafe Alhazawa Rayi	Yamaltu deba	9.9
25	Kubu-Lafiya Garin Koshi Shinga	Yamaltu deba	14.4
26	Wajari Soroje Deba	Yamaltu deba	8.3
27	Jarawa Maikaho Tsando Talasse Road	Yamaltu deba	11.9
28	Kashere Garin Guda Garin Waziri-futuk Yalo (Spur to Badara)	Akko	21.0
29	Tulmi Bakin Kogi Wuro Yaya Gamawa Weddare Barambu Garin Garba Lergo	Akko	13.5
30	Lawanti Lambu Daji Tukulma	Akko	35.3
31	Jauro Malam Wuro Yaya Gamawa Weddare Barambu Garin Garba Lergo	Akko	17.1
32	Kumo Bappa Ibrahima Luggeroyol-Papa	Akko	17.2
33	Difa Gwani(west)	Yamaltu deba	9.6
34	Lawanti Dolli	Akko	7.3
35	Ture Kaltin Balamusa Lafiya Jalingo	Kaltungo	29.9
36	Gelengu Bakasi Balan Sami	Balanga	13.4
37	Balan Sami Wadachajangara	Balanga	7.7
38	Kembu Pokwaka Gujuba Kaltungo	Akko/billiri/kaltungo	29.2
39	Ladongor Sansani Amuta Kayal Baga Junction (Maiganga Road)	Billiri	90
40	Lapan Labarya Lasanjang	Shongon	21.3
41	Jauro Sajo Sakin Fulani Ayanshari	Shongon/billiri	11.6
42	Poshereng Purmai Banguji	Shongon	22.6
43	Sabon Layi Jesu Duara Spur to Heme	Balanga	6.2
44	Sanon Layin Fulani Lekelembu Pandimpe	Billiri	8.9
45	Ayaba Langa Panguru	Billiri	8.1
46	Dongol Ayaba	Billiri	4.1
47	Ayaba Latede Kwaya Tudu	Billiri	15.4
48	Latan Kuran Mota Panguru	Billiri	17.0
49	Tudu Daja Gundali Filiyaa	Shongon	27.2
	Total		779.84

Component 2: Capacity Building for Value Chain Actors

This component aims at capacity development to strengthen the sector institutions (public, private and community –based institutions) to deliver quality services to the prioritized commodity value chain actors. Activities will include

training of beneficiaries (farmer groups, processors, marketers) including women and youth in methodologies for post-harvest losses reduction, food processing, business and entrepreneurship; and access to financial services, capacity development for Agricultural Extension Agents and Technical Officer of the Ministries responsible for development and maintenance of rural roads, farmer groups, private (MFIs, agro-dealers, etc.) and community – based organisations (producers' organizations, cooperatives, inter-professional bodies, etc.; infrastructure maintenance, environmental and climate change awareness, youth attachment/training and community tree planting scheme.

Component 3: Project Management and Coordination

This component entails the day to day management of the project based on adequate results measurement framework. The component will finance State Project Implementation Units (PIU) and a Federal Project Coordinating Unit. The staff will include Coordinator, Infrastructure Engineer, Monitoring and Evaluation Officer, Environmental and Climate Change Safeguards officer, social safeguards/gender officer, Development Communication Officer, Agro-logistics Officer, Project Accountant and Procurement Officer. The Accountant and Procurement Officer will be recruited competitively. The rest of the staff will be appointed by the relevant state Agencies. Both the appointments and the recruitments will be based on Terms of Reference and Criteria acceptable to the Bank. The component will also include procurement of transport and office equipment, technical assistance, technical and financial audits, ESIA, ARAP, ESMP Monitoring and Auditing, studies (baseline, evaluations etc.). These activities shall be funded by the State PIUs.

3.4 Project Phases and Activity Sequence

RAAMP implementation may include activities involving:

- Establishing temporary access to work and ancillary areas, demarcating clearance zones, establishing access control.
- For road upgrading, erection of temporary diversions where needed to manage existing traffic.
- Clearance and levelling of the corridor, and major earthworks where required (e.g. cutting and filling of earth roads).
- Location and development of borrow pits (and possibly quarries).
- Improvement of existing drainage and introduction of new road drainage, including culverts if required.
- Surfacing and sealing of the carriageway, including use of bitumen mixing plants where the road is to be sealed i.e. Anambra, Benue and Cross River.
- Water crossings, e.g. construction or upgrading of and culverts,

CHAPTER FOUR: ENVIRONMENTAL AND SOCIAL BASELINE INFORMATION

4.1 Introduction

This Chapter presents a concise description of the physical, biological and social environment of the 6 states (Anambra, Cross-River, Benue, Taraba, Gombe and Borno) where RAAMP will be supported by the African Development Bank in Nigeria.

4.2 Bio-Physical Environment

4.2.1 Location

The project states are distributed across the major zones in Nigeria with 3 of the states located in the North, 2 in the South and 1 in the middle belt. The locations of the benefiting states are briefly described in Table 4.1.

Table 4.1: Location of RAAMP States

S/N	State	Description
1	Anambra	Anambra is in south-eastern part of Nigeria between 6° 20'N; 7° 00'E and 6.3330N; 7.0000 E. The state occupies 4,844 km ² of land and borders Delta State to the west, Imo and Rivers States to the south, Enugu State to the east and Kogi State to the north. The prioritised roads and intervention areas cover a total of 18 out of the total 21 LGAs in the state.
2	Cross-River	Cross River State is in the south-south geopolitical zone, and within the tropical rainforest belt of Nigeria. It lies between latitude 4° 28' and 6° 55' North of the Equator and longitude 7° 50' and 9° 28' East of the Greenwich meridian. It shares common boundaries with the Republic of Cameroun in the East, Benue State in the North, Ebonyi and Abia States in the West, Akwa Ibom State in the South West and the Atlantic Ocean in the South. It has a land area of 20,156 km ² , and it is a coastal region covered with bodies of water from the tributaries of Cross River and the Atlantic Ocean.
3	Benue	Benue state lies in the lower river Benue trough in the North-central region of Nigeria between 7° 20'N; 8° 45'E and 7.333N; 8.750 E. The state occupies 34,059 km ² of land and shares boundaries with 5 states; Nasarawa state to the North, Cross River state to the South, Taraba state to the East, Enugu state to the South-west and Kogi state to the West.
4	Taraba	Taraba is a state in the North-eastern Nigeria located between 8° 00'N; 10° 30'E and 8.000N; 10.5000 E and occupies a total of 54,473km ² of land. The state is bounded on the West by Nasarawa and Benue states, on the North West by Plateau state, on the North by Bauchi and Gombe States, on the North East by Adamawa state and on the East and South by Cameroon
5	Borno	Borno is a state in the North-eastern Nigeria located between 11° 30'N; 13° 00'E and 11.500N; 13.000 E and occupies a total of 57,799km ² of land. The State occupies the greatest part of the Chad Basin and shares borders with the Republics of Niger to the North, Chad to the North – East and Cameroon to the East. Within the country, it is bordered by Adamawa to the South, Yobe to the West and Gombe to the Southwest.

6	Gombe	Gombe state is located in the centre of North East Nigeria on latitude 9°30' and 12°30'N, Longitude 8°5' and 11°45'E. The state was carved out of the old Bauchi State on 1st October 1996. It shares boundaries with Yobe state to the North, Borno and Adamawa states to the East and Bauchi state to the West and Taraba State to the South with a land mass of 20,265 km ² .
---	-------	---

Map of Nigeria showing the 6 RAAMP states is presented in Figure 4.1

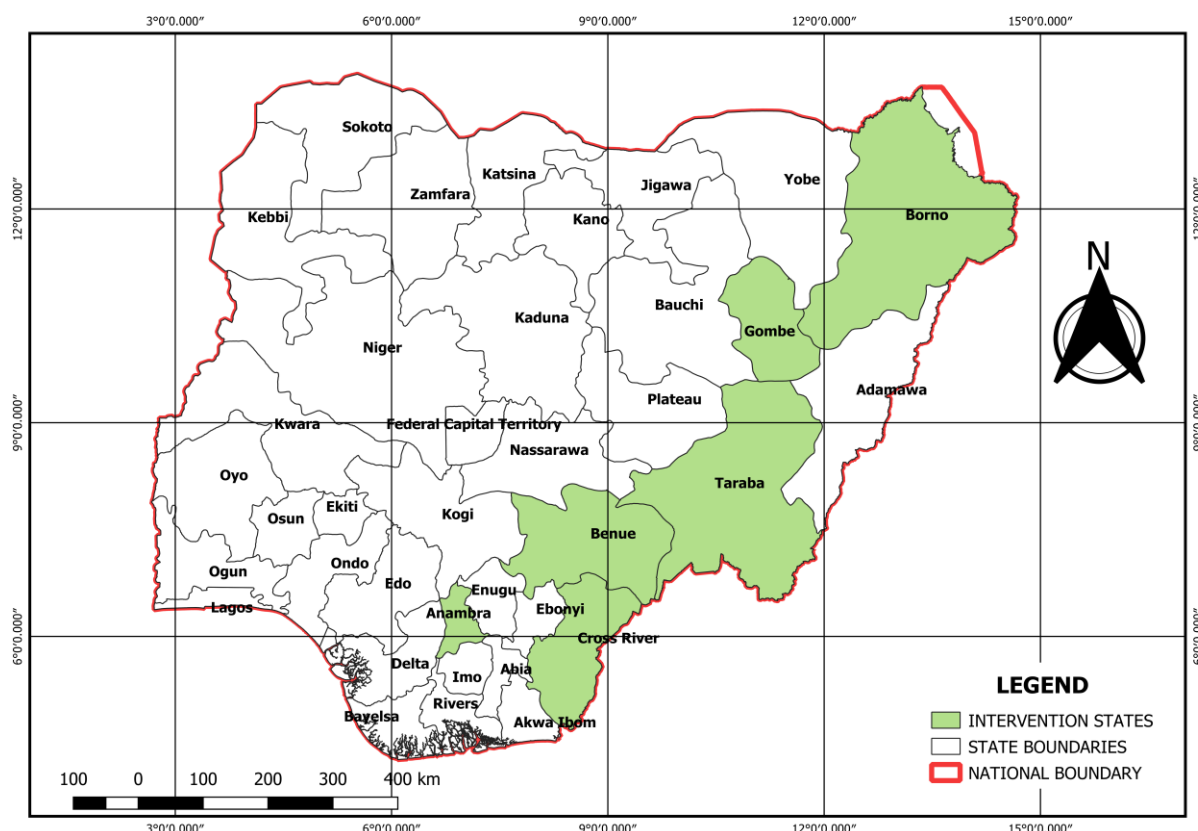


Figure 4.1: Map of Nigeria showing the intervention states

4.2.2 Climate

The climatic conditions of the RAAMP states are presented in Table 4.2.

Table 4.2: Climate of RAAMP States

S/N	State	Description of Climate
1	Anambra	Anambra state is in the tropical rainforest zone of Nigeria and experiences two distinct seasons brought about by the two predominant winds that rule the area: the southwestern monsoon winds from the Atlantic Ocean and the north-eastern dry winds from across the Sahara Desert. The monsoon winds from the Atlantic creates six months of heavy tropical rains, which occur between April and July, followed by a short dry period in August lasting two to three weeks with the rain resuming in September and October. This is followed by five months of dryness (November - March) marked by a Harmattan wind, which is a particularly dry and dusty. This wind is also characterized by a grey

		haze limiting visibility and blocking the sun's rays before dissipating and leading to extreme dry heat in the latter months of February and March. The temperature in Anambra is generally 27-30°C between June and December but rises to 32-34 °C between January and April, with the last few months of the dry season marked by intense heat. Average Rainfall in Anambra state is around 1,991mm.
2	Cross-River	High mountains generally surround the state. Ambient temperature ranges from 28 °C- 37 °C. It rests in a coastal region covered with bodies of water from the tributaries of Cross River and the Atlantic Ocean. Similar stratigraphic sequences of thick cohesion-less sand strata overlain by a red clayey sand stratum and surface earth of sandy loam or silty loam, are predominant in the area. Cross River state receives abundant amount of rainfall averaging 2,179mm annually.
3	Benue	Benue State has a tropical sub-humid climate with two distinct seasons. The wet season which lasts for seven months starts from April and ends in October. There is however, usually one or more heavy early rains in January, February or March. It is this early rainstorm that enables farmers to hoe their farms in preparation for the planting season that starts in March. The annual total rainfall ranges from 1200 – 2000 mm. Temperatures are generally very high in the day. Makurdi, the state capital, for example records average maximum and minimum daily temperatures of 35°C and 21°C respectively.
4	Taraba	Like most parts of northern Nigeria, Taraba State has a wet and dry climate. The wet season lasts, on the average, from April to October. Mean annual rainfall varies between 1058mm in the north around Jalingo and Zing, to over 1300mm in the South around Serti and Takum. The wettest months are August and September. The dry season lasts from November to March. The driest months are December and January with relative humidity dropping to about 15 percent. The mean annual temperature around Jalingo is about 28°C with maximum temperatures varying between 30°C and 39.4°C.
5	Borno	Raining season in Borno state begins in June and ends in September (4 months) while the dry season lasts for 8 months beginning from October – May. Dusty windstorms with very hot weather conditions are some of the characteristics of the beginning of rainy season. The state is characteristics with extreme weather conditions, very hot up to even 40°C during the hot dry season and also as cool as 5°C during the cool dry season. The rainfall range decreases as you move north ward. The vegetation is made up of short thorny tree species and short annual grasses. With shorter rainfall season, Borno state receives average of 1.200mm of rainfall annually.
6	Gombe	Gombe has two distinct climates, the dry season (November–March) and the rainy season (April–October) with an average rainfall of 850mm. Temperatures are generally high in the state with the mean monthly maximum temperature of the study area is between 29.7°C – 37.2°C with the hottest period usually occurring in the months of March and April. The mean monthly minimum temperature ranged between 13.6°C – 23.7°C with the lowest mean monthly temperature recorded in the month of December. The state is in the tropical zone where the average range of sunshine hours is between 5.25 hours per day in July to about 7.68 hours per day in December.

4.2.3 Air Quality and Noise

As part of site visits undertaken during the preparation of the ESMF, some baseline ambient air quality and noise level data were collected at a number of sensitive receptors to generate initial data on baseline conditions across the 6 RAAMP states.

Table 4.3: Result of Air Quality and Noise Level Assessment

	Anambra	Cross-River	Benue	Taraba	Borno	FMEEnv Limit
Location	Ihueze, Orumba North LGA	Nyahasang, Calabar Municipal LGA	Ugbokpo, Apa LGA	Jalingo LGA	Jere LGA	
Coordinates	N06°03'28.5" E007°08'24.0"	N04°58'42.2" E008°21'57.2"	N07°40'52.2" E007°55'11.2"	N08°53'43.3" E011°22'35.2"	N14°48'36" E013°11'14"	
Temperature (°C)	26.9	27.9	28.3	27.2	30.2	--
Relative Humidity (%)	78.1	80.6	78.7	72.5	68.7	--
NH ₃	0.0	0.0	0.0	0.0	0.0	
H ₂ S (mg/m ³)	0.0	0.0	0.0	0.0	0.0	0.008
NO ₂ (ppm)	0.0	0.0	0.0	0.0	0.0	0.04 – 0.06
SO ₂ (ppm)	0.0	0.0	0.0	0.0	0.0	0.1
CO (ppm)	0.0	0.0	0.0	0.0	0.0	10
CO ₂ (ppm)	952	921	843	933	922	--
O ₂ (ppm)	20.9	20.9	20.9	20.9	20.9	--
VOC	0.0	0.0	0.0	0.0	0.0	--
Particulate Matter (ug/m ³)	9.6	30.9	32.6	40.3	41.0	250
Weed Speed (m/s)	0.1	0.2	0.2	0.3	0.3	--
Noise Level dB(A)	44.7	54.4	54.3	38.9	52.6	90



Plate 4.1: Air Quality and Noise Level Assessment along road corridors (Nyahasang, Cross-River and Ihueze, Anambra States respectively).

The result of air quality assessment along selected prioritised roads in the 5 states indicates that all pollutants measured were either not detected or within acceptable FMEnv limits. Consequently, the ambient air quality in the area can be adjudged to be good. Specifically, air shed within the project area of influence is not degraded as the areas are rural in nature with the major anthropogenic activity being peasant farming.

The ambient daytime noise levels recorded within the sampling locations ranged between 38.9 – 54.4 dB indicating the values were below the FMEnv permissible Noise Exposure Limits of 90 dB.

However, noise level and the concentration of some of these pollutants, particularly, SO₂, H₂S, NH₃, CO, VOC and Particulate Matter may be elevated beyond threshold levels during road construction due to ground disturbing activities and use of heavy duty vehicles and other equipment. Indicative mitigation measures to mitigate the effect of noise and air pollution have been included in the ESMF. Detailed site specific mitigation measures will be presented in the sub project ESIA and ESMPs.

4.2.4 Geology and Soils

The key geological features of the 5 states implementing RAAMP are presented in Table 4.4.

Table 4.4: Geology and soils of RAAMP States

S/N	State	Description
1	Anambra	<p>Anambra State lies in the Anambra Basin, the first region where intensive oil exploration was carried out in Nigeria. The Anambra basin has about 6,000 m of sedimentary rocks. The sedimentary rocks comprise ancient Cretaceous deltas, somewhat similar to the Niger Delta, with the Nkporo Shale, the Mamu Formation, the Ajali sandstone and the Nsukka Formation as the main deposits. On the surface the dominant sedimentary rocks are the Imo Shale a sequence of grey shales, occasional clay ironstones and Sandstone beds.</p> <p>Three soil types are found in Anambra State, namely (i) alluvial soils, (ii) hydromorphic soils, and (iii) ferallitic soils. The prioritized roads and intervention areas cover 18 out of the 21 LGAs indicating that the construction will be taking place on the 3 soil types. Adequate attention should thus be given to soil types particularly in LGAs such as Orumba North, Orumba South and Aguata where there are alluvial, loose and unconsolidated soils that are highly prone to erosion. On the other hand, in LGAs such as Ogbaru, Anambra West, Ayamelum, the predominant soil type is hydromorphic with subsurface water saturation which might make construction very challenging during the wet period. The soils in the riverine areas are highly ferallitic soils with high clay and iron contents.</p>
2	Cross-River	Cross River State is composed of sedimentary rocks which constitute the Calabar Flank and metamorphic and intrusive rocks which crop out in the Oban massif and Obudu Plateau. The origin of the

		<p>Calabar flank is intimately associated with the development of the Benue rift system. After the initial rifting episode, this area underwent a somewhat different tectonic and stratigraphic development compared to the adjacent Anambra and Southern Benue through sedimentary basin. The initial rifting of the Southern Nigerian margin produced two principal sets of faults, NE-SW and NW-SE system. The former set of faults bond the Benue depression, while the latter sets were more prominent and active in the Calabar Flank.</p> <p>The soils in most parts of the state where RAAMP roads are located are generally deep, sandy at the surface and clayey at the sub-surface layers. In addition, the soils are friable when moist, well-drained and susceptible to erosion. Consequently, unsealed rural roads in the state usually failed within a few years as the top-soil layers are easily washed away by sheet erosion leaving the sub-surface clayey layer degraded by gully erosion.</p>
3	Benue	<p>The geology of the state may be broadly grouped into two: (a) Metasediments occurring in the Benue and Katsina Ala river valleys; and (b) Basement complex rocks occur on higher ground further away. The sedimentary formations are rich in limestone, coal and mineral salt.</p> <p>The soils are mainly tropical ferruginous soils with hydromorphic soils along the flood plains. Deep-seated lateritic crust also occurs over extensive areas on the plains. The agronomic significance of this sub-soil crust is that it often produces a perched water table which is an important source of capillary water which keeps the surface moist long after the end of the rainy season. Consequently, the soils in most parts of the state are poorly drained especially those around the flood plains in areas such as Ikpayongo, Aliade, Katsina-Ala, Abinsi Guma and Oturkpa making them suitable for rice farming. For these areas, adequate drainage should be considered which should be properly terminated in a river system to prevent flooding of communities and farmlands downstream.</p> <p>There are also areas with well-drained soils and reasonable angle of slope with predominant loamy sandy and gravelly sand textures. These soil types are found in areas such as Gboko, Uchongo, Okpokwu, Ohimini, Gwer East, Ado and Obi. Roads in these areas should be sealed immediately after construction to prevent erosion of loose top-soils.</p>
4	Taraba	<p>The state may be divided into three topographic regions, namely, the extensive Fadama swamps of the Muri plains, hills on sedimentary formation and the Plateau developed on basement complex rocks. The Mambilla Plateau forms the watershed from which the major drainage systems in Taraba State take their source.</p> <p>The locations of RAAMP roads are characterized predominantly by both hydromorphic and ferruginous tropical soils which over the years have been greatly influenced by altitude and human interference. The soil type is predominantly a mixture of loams and sands on the hilly terrain and clay loamy along the riverbanks supporting a wide range of crops cultivated in the state.</p> <p>The soils around the hilly terrain are particularly prone to erosion. This is not surprising as the soils are made up mainly of sandy loam</p>

		<p>textures, generally low in organic content and are thus well drained. The erosion menace in the state is further compounded by the topography which in some part is on a hill with varying degree of slope thus predisposing top-soils to erosion. The flat lands are also not left out by erosion due to the friable, loose and unconsolidated nature of soils. RAAMP roads in the state should be sealed with appropriate drainage included to prevent erosion.</p>
5	Borno	<p>Greater part of the states lies on the Chad formation. The Chad formation is separated by Cretaceous Bima and Kerri sandstones. The volcanic areas of the Biu Plateau and the basement complex areas of the mandara mountains are found in the south and south eastern part of the state. Physiographically Borno State could be divided into 2 broad relied regions; Hilly/mountainous area over 600m about sea level and the plains of less than 600m above sea level. Southern and south eastern Borno is predominately hilly, geologically underlain by the basement complex.</p>
6	Gombe	<p>Gombe State is geologically a part of the Upper Benue Trough, although the state is an entity of its own, the Gongola Trough. As such, the state constitutes a major sedimentary basin, with a fill of about 6,000m of Cretaceous Tertiary Sedimentary rocks. These rocks are well exposed throughout the state. The eastern part of Gombe State is geologically older than the west.</p> <p>Gombe State lies mostly within the poor groundwater provinces in the Gombe Sandstones, the Pindiga shales; Kerri-Kerri Formation of Tertiary Age and the isolated hills region of the northern central and southern parts. Groundwater occurs between 0180m depth on the sandstones. In the Gongola River Basin sedimentaries, because of the cretaceous sandstones and shales, groundwater is generally erratic and meagre.</p> <p>On the Chad Formation in the northern part of the state, the soils are deep but sandy, and developed on clays and silty clays; but are mostly blanketed by sand dunes. Soils in the eastern part of Gombe State are shallow to deep loamy, sandy clay, loam and vertisols with cracking clays that have weathered from shales.</p>

Source: MMSD, 2019; FPMU (RAAMP), 2018

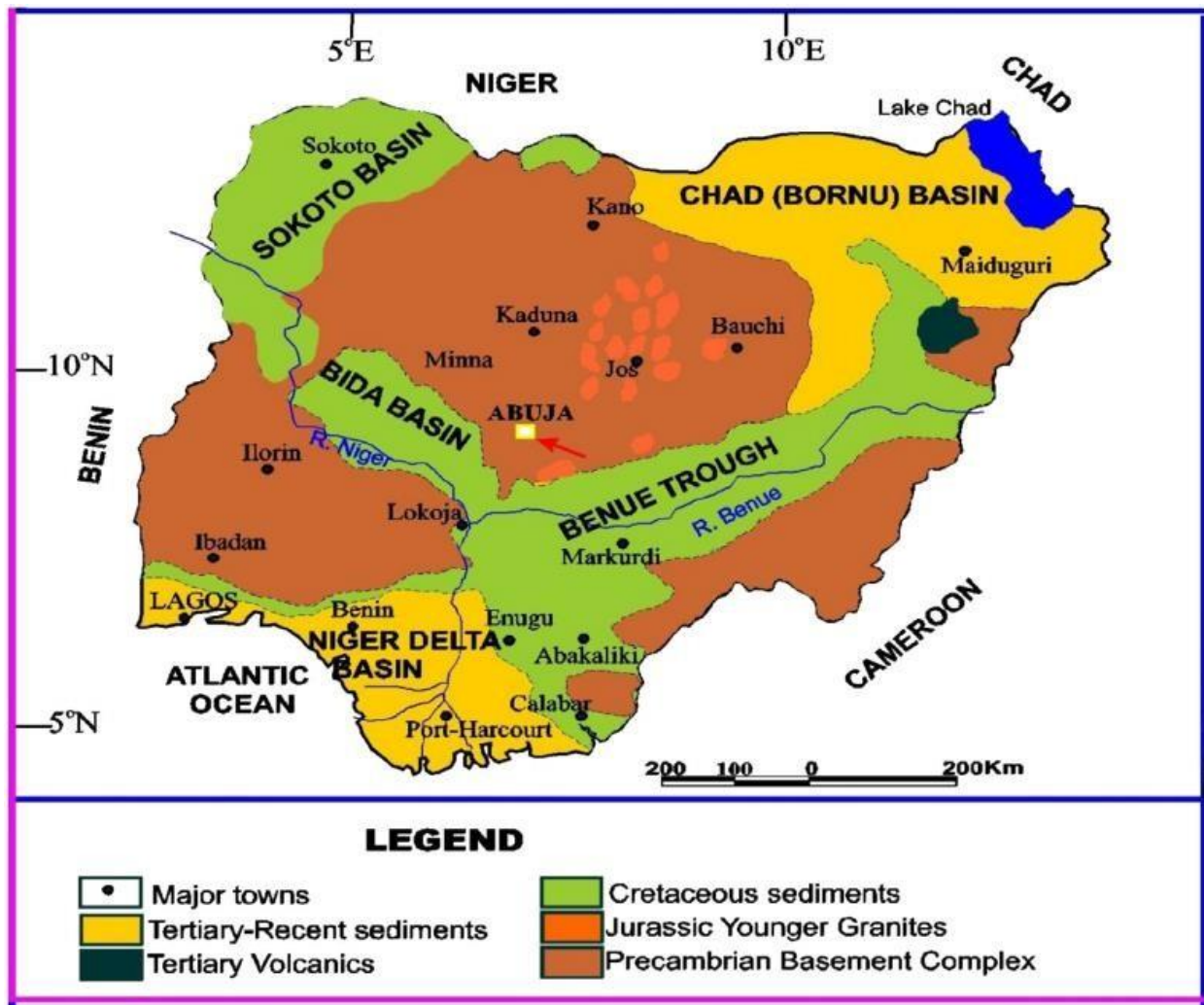


Figure 4.1: Geological Map of Nigeria

Source: Omeje (2013)

4.2.5 Vegetation

The vegetation of Benue, Cross-River and Anambra is predominantly tropical rainforest with swampy areas in cross-River state and guinea savanna in Benue State. Taraba and Borno States are covered mainly by savanna type vegetation. The sahel savanna predominates Borno while guinea savanna predominates Taraba State as shown in Figure 4.2 and described in Table 4.5.

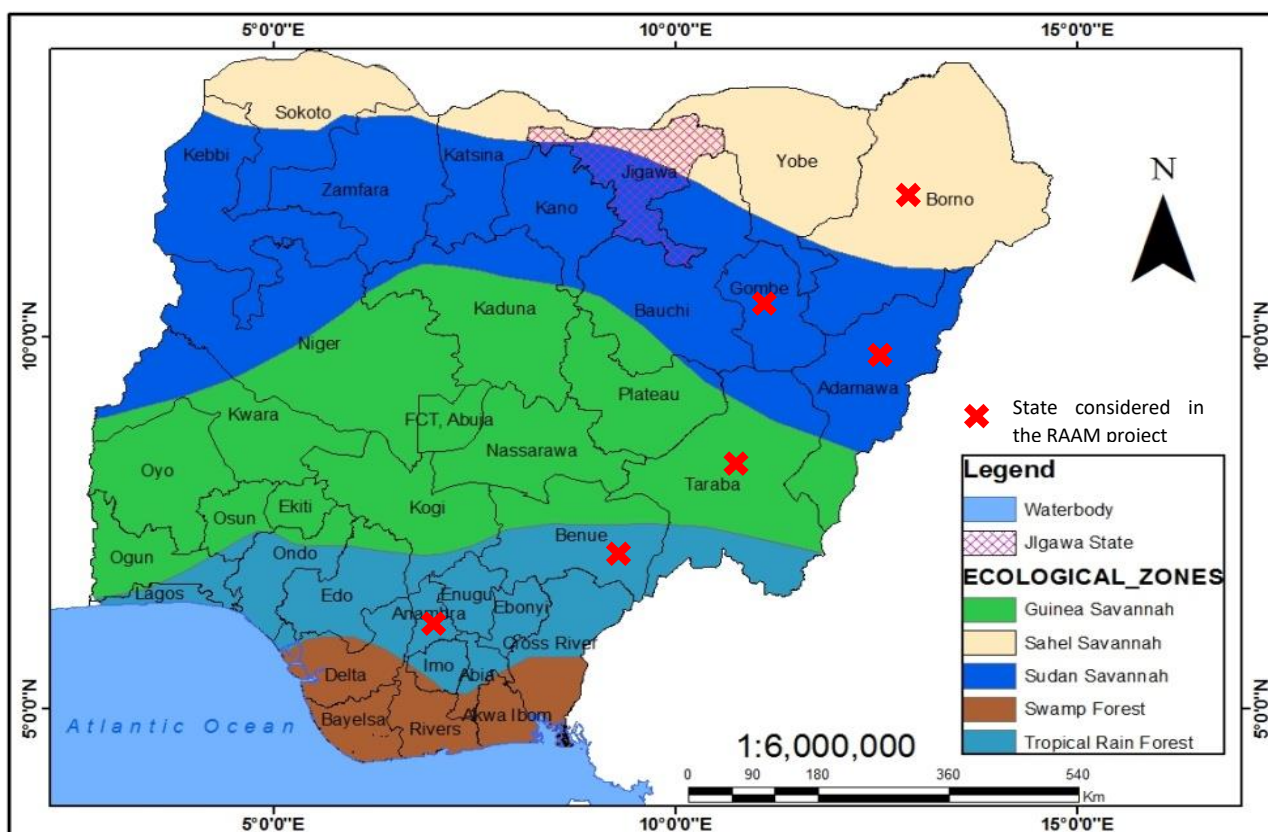


Figure 4.2: Vegetation map of Nigeria

Table 4.5: Vegetation of the Project Areas

S/N	State	Description
1	Anambra	<p>Anambra State is in the rainforest vegetation zone in Nigeria. The natural vegetation in the greater part of Anambra State is tropical dry or deciduous forest, which, in its original form, comprised tall trees with thick under growth and numerous climbers.</p> <p>RAAMP activities in the state will affect some of these trees, particularly economic trees including oil palm, mango, coconut etc. It is therefore imperative to avoid removal of trees as much as possible during construction, particularly because the most parts of the state are prone to erosion including gully formation due to the alluvial, loose and unconsolidated nature of soils in the state.</p>
2	Cross-River	<p>Cross River is the main river in the Cross-River State. The Cross-River drains into the Bight of Biafra in the extreme south-eastern corner of Nigeria's coastline. The Cross River forms a boundary between two tropical moist forest ecoregions, the Cross-Niger transition forests which lie west of the river, between the Cross and Niger Rivers, and the Cross-Sanaga-Bioko coastal forests, which lie to the east between the Cross River and the Sanaga River of Cameroon.</p>
3	Benue	<p>Benue State lies in the Southern Guinea Savannah to the north and tropical rain forest to the south of the state. Persistent clearance of the vegetation has led to the development of regrowth vegetation at various levels of seral development but more importantly, parklands with grasses ideal for animal grazing during their early growth. These succulent grasses can be cut with machinery, dried and baled for dry season livestock feeding. The grasses however</p>

		<p>grow tall, coarse and tough on maturity. The scattered trees are mainly those of economic value and include locust bean, shea butter, mango, silk cotton et cetera. These trees produce valuable fruits and wood which can be utilized for small scale cottage industries.</p> <p>River Benue is the dominant geographical feature of the state. It is one of the few large rivers in Nigeria that is not plagued with water falls or rapids. The Katsina Ala is the largest tributary while the smaller rivers include the Loko, Itobi Aya, Amile, Dura, Konshisha, Ogede and Ombi. The flood plains which are characterised by extensive swamps are good for dry season irrigated farming. Elsewhere, surface drainage is generally good.</p>
4	Taraba	<p>The vegetation may be classified into three broad types: The Northern Guinea, the Southern Guinea and the Mountain Grassland and forest vegetation. The boundary between the Northern Guinea and Southern Guinea corresponds fairly closely with the 1400mm mean annual rainfall isohyet, while the mountain forest and grassland vegetation occur mainly on the Mambilla plateau.</p> <p>Rivers Benue, Donga and Taraba (from which the state derives its name) are the dominant drainage systems which flow across the Muri plains to drain the entire state. Together with the minor ones, such as the Lamorde and Mayo Randewo, they form extensive flood plains in the central part of the state, providing sufficiently fertile agricultural land which is presently underutilized.</p>
5	Borno	<p>Generally, two vegetation zones are identified in the state: Sudan savannah in the southern part and Sahel savanna in the northern areas. Although the vegetation is predominantly grassland, however, in the wetter south, the shrub vegetation is interspersed with tall trees and woodland.</p>
6	Gombe	<p>Gombe state falls within the Sudan Savannah vegetation belt of Nigeria characterised by a mixture of grasses and low growing shrubs and trees. The grasses and shrubs are found across the entire state while wood lands are concentrated in the South East and South West parts of the state. The state is currently experiencing desert encroachment which is greatly exacerbated by human activities such as over cultivation, overgrazing, etc.</p> <p>The Sudan Savannah vegetation belt is found in the north-west, stretching from the Sokoto plains in the west, through the northern sections of the central highland. It spans almost the entire northern states bordering the Niger Republic and covers over one quarter of Nigeria's total area.</p>

4.3 Social Environment

The summary of the socioeconomic setting of the participating states are presented in Table 4.6.

Table 4.6: Socioeconomic Data of the Participating States

S/N	PARAMETER	Anambra	Benue	Borno	Cross River	Taraba	Gombe
1	Capital City	Awka	Makurdi	Maiduguri	Calabar	Jalingo	Gombe
2	Local Govt Areas	The 21 LGAs in Anambra State: Aguata, Anambra East, Anambra West, Aniocha, Awka North, Awka South, Ayamelum, Dunukofia, Ekwusigo, Idemili North, Idemili South, Ihiala, Njikoka, Nnewi North, Nnewi South, Ogbaru, Onitsha North, Onitsha South, Orumba North, Orumba South, Oyi.	The 23 LGAs in Benue State are Ado, Agatu, Apa, Buruku, Gboko. Guma, Gwer East, Gwer West, Katsina-Ala, Konshisha, Kwande Logo, Makurdi, Obi, Ogbadibo, Ohimini, Oju, Okpokwu, Otukpo, Tarka, Ukum, Ushongo, Vandeikya	Borno state has 27 local government area, they are; Abadam, Askira/Uba, Bama, Bayo, Biu, Chibok, Damboa, Dikwa, Gubio, Guzamala, Gwoza, Hawul, Jere, Kaga, Kala/Balge, Konduga, Kukawa, Kwaya Kusar, Mafa, Magumeri, Maiduguri, Marte, Mobbar, Monguno, Ngala, Nganzai, Shani	There are 18 LGAs- Abi, Akamp, Akpabuyo, Bakassi, Bekwara, Biase, Boki, Calabar-Municipal, Calabar South, Etung, Ikom, Obanliku, Obubra, Obudu, Odukpani, Ogoja, Yakurr and Yala	The 18 LGAs in Benue State are: Ardo Kola, Bali, Donga, Gashaka, Gassol, Ibi, Jalingo, Karim Lamido, Kurmi, Lau, Sardauna, Takum, Ussa, Wukari, Yorro, Zing	11 LGAs: Akko, Balanga, Billiri, Dukku, Kaltungo, Kwami, Shomgom, Funakaye, Gombe, Nafada/Bajoga, Yamaltu Deba.
3	Region in Nigeria	South East	North Central	North East	South South	North East	North East
4	Major Ethnic Group	Igbo	Tiv, Idoma and Iggede	Kanuri, Other ethnic groups such as Lamang, Babur/Bura and Marghi are also found in the southern part of the state	Efik, Ejagham, Yakurr, Bette, Yala, Iggede, Ukelle and the Bekwarra.	Major ethnic groups include Fulani, Mumuye, Jukun, Jenjo, Kuteb, Chamba and Mambilla etc	Gombe State is mainly populated by Fulani People constituting more than 50% of the population. Other minor ethnic groups include the Hausa, Bolewa, Tera, Tangale, Waja and Kanuri.

S/N	PARAMETER	Anambra	Benue	Borno	Cross River	Taraba	Gombe
5	Main Native language	Igbo	Tiv, Idoma and Igede	Kanuri, Hausa	Boki, Ejagham and Efik	Fulfude, Hausa, Mumuye, Jukun	Hausa is the commercial language amidst the people
6	Population*	The total population is about 5,527,809 as at 2016	The state has a total population estimate of 5,571,815 as at 2016	The total population is estimated at 5,860,183 in 2016	The state has a total population estimate of 3,866,269 as at 2016	The total population is estimated at 3,066,834 in 2016	The state has a total population estimate of 3,472,223 as at 2016
7	Population by Gender	Male: 2,819,182 Female: 2,708,626	Male: 2,928,326 Female: 2,813,489	Male: 2,988,693 Female: 2,813,489	Male: 1,971,797 Female: 1,894,472	Male: 1,564,085 Female: 1,502,789	Male: 1,770,834 Female: 1,701,389
8	Population Density	862.5 persons/ km ²	124.9 persons/km ²	72.2 persons/km ²	143.5 persons/ km	42.1 persons/km ²	7,067 persons/km ²
9	Landmass	4,844 km ²	34,059 km ²	57,799 km ²	20,156 km ²	54,473 km ²	18,768km ²
10	Major Economic Activities	Major economics activities include agriculture, manufacturing and commerce. Agriculture dominates the rural economy. Agricultural activities include farming, livestock & forestry. The state has relatively high concentration of trade/commercial activities artisans and small manufacturing. The state's economic potential lies in its	Agriculture is the mainstay of the economy as it is practiced by over 75% of the people. The popularly grown crops includes; Sweet potatoes, cassava, soya beans, guinea corn, yams, rice, groundnut etc. The state also boasts of long stretch of river systems with great potential for viable fishing industry.	The major occupation of the people in the state is agriculture with crops like sorghum, millet, maize and groundnuts. Rearing of animals is also another form of agricultural practices by the people in the state. Small percentage of the people are traders and civil servants	Tourism and Agriculture (including fishing) are the two major economic thrust of the State. Agriculture employs about 80 percent of the State's labour force and contributes about 40 percent to the Gross State Products (GSP). The Tourism infrastructure is well developed to international standard, like the Obudu Ranch Resort, Tinapa Business Resort, etc. which currently attracts	The major occupation of the people of Taraba State is agriculture. Cash crops produced in the state include coffee, tea, groundnuts and cotton. Crops such as maize, rice, sorghum, millet, cassava, and yam are also produced in commercial quantity. In addition, cattle, sheep and goats are reared in large numbers, especially on the Mambilla Plateau, and along the Benue and Taraba	The people of Gombe state (80%) are primarily farmers producing food and cash crops, which include Cereals: Maize, Soghum, Rice and wheats: Legumes: Cowpeas, groundnuts, soya beans and bambara nuts. Fruits: Orange, Lemon, Mango, Guava, Pawpaw and grapes. Vegetables: Tomatoes, pepper,

S/N	PARAMETER	Anambra	Benue	Borno	Cross River	Taraba	Gombe
		industrial layouts in Onitsha and Nnewi.			several tourists to the State.	valleys. Similarly, the people undertake other livestock production activities like poultry production, rabbit breeding and pig farming in fairly large scale. Communities living on the banks of River Benue, River Taraba, River Donga and Ibi engage in fishing all year round.	onions, okra, pumpkin and melon. Tree Crops: Gum Arabic, Kenaf, sugar cane, sunflower and ginger.
11	Major Cultural Resources	Agulu Crocodile Lake, Ogbunike Caves, Igbo Ukwu Museum, etc.	Gurgul water fall on Katsina –Ala River, Enumabia Warm Spring, Tombs of the first Dutch Missionaries etc.	The Lake Chad	Ikom Monoliths, the Mary Slessor Tomb, Calabar Drill Monkey Sanctuary, Cross River National Park, Afi Mountain walkway canopy, Kwa falls, Agbokim waterfalls, Tinapa Business Resort etc.	Mambilla Plateau Gembu, Barup Waterfalls, Marmara Crocodile Wukari etc.	The Emir's Palace, Bima Hill, Dadin Kowa Dam, Killang hill, Tula Battlefield, Bulok warm Spring, Kalam hill, The Cham Valley, Binga Ruins, Bage hills, Tula hideout caves, kanawa forest etc.
12	HIV/AIDs Prevalence 2016/2017	2.4% 5 th Position	4.9% 2 nd Position	1.3% 17 th Position	1.7% 12 th Position	2.7% 4 th Position	1.2% 20 th Position

Source: National Population Commission and National Bureau of Statistics Estimates (2017) & FPMU (RAAMP), 2018
NAIIS (2019)

4.3.1 Land Use Pattern, Agricultural Production and Livelihoods

The estimated land area of Nigeria is 923,768 km². Land use varies based on location and the needs of the community. However, the different uses of land revolve around agriculture, industry and social needs such as the provision of infrastructure. Recent data shows that between 50%- 60% of the land area of Nigeria is under various forms of intensive rain fed small holder agriculture (crop and animal) production and forest plantation.

Agriculture in Nigeria is largely subsistence and is characterized by intensive small holder rain fed and extensive grazing. Various schemes have been put in place to further boost agricultural production, these includes the Irrigation system, FADAMA projects, grazing zones/routes, and Agro-allied business such as fertilizer production. In addition to fish farming activity, some coastal/riverine communities also engage in fishing activities and other aquatic resources. RAAMP is another program aimed at boosting agriculture as access to market will encourage farmers to do more when their losses due to transportation bottlenecks have been reduced.

Agricultural produce in Nigeria vary from one region to the other. Major produce in the north are cereals ((such as millet, millet), rice, maize, beans, soya beans and vegetables. Irish potato, yam, potato are the main agricultural produce in the middle and southern Nigeria belt while cassava, cash crops such as cocoa, coffee, cola nuts and cashew nuts are grown in the south-western Nigeria, also, red oil production and cassava are exceptionally produced at the south-eastern region.

4.3.2 Employment, Economy and Poverty

Estimate from the Nigerian Bureau of statistics (NBS) indicates that unemployment rate in Nigeria within the period is 14.2% from 13.3% in (2Q 2016), while youth unemployment stands at 24.0%. It is therefore well conceived that the inclusion of the agricultural marketing component to the existing rural access function of RAAMP will unlock the agro sectoral constraints and stimulate the potentials of the agro value chains to support massive employment in Nigeria. The Nigerian economy rests on two pillars: oil/gas and agriculture. Both sectors contributes 65% - 70% of GDP, while the secondary sector (manufacturing contributes about 7% and the tertiary sector (transport, trade, housing etc) contributes about 25%.

Nigeria's major industries are located in Lagos, Agbara and Sango Otta (Ogun State), Port Harcourt, Ibadan, Aba, Onitsha, Calabar, Kano, Jos and Kaduna.

From a GDP growth rate of 6.3% in 2014, Nigerian economy shrank 1.3% year-on-year in the fourth quarter of 2016, following a 2.24% decline in the previous

period. Inflation rate in Nigeria as at September 2016 was 17.91% (NBS, 2016). According to the World Bank national account data file, the latest value for GNI per capita, Atlas method in Nigeria fell from US\$2,970.00 as of 2014 to US\$2820 in 2015 as against US\$6050 for South Africa in the same period

It is estimated that 60% of the total population of Nigeria live below the poverty line. The average percentage of the urban poor (i.e. % of population below national poverty line) is a staggering 45% compared with the USA average of 32%.

4.3.3 Communicable and Non-Communicable Diseases in Nigeria

Communicable diseases along with maternal, parental and nutritional conditions in Nigeria accounted for an estimated 67 per cent of all mortality in 2008 (Common wealth online, 2018). Communicable diseases spread from one person to another or from an animal to a person. The spread often happens via airborne viruses or bacteria, but also through blood or other body fluid. The terms infectious and contagious are also used to describe Communicable disease.

In Nigeria, as in other African countries, the challenge is to develop or reinforce mechanisms to detect, verify and respond rapidly and effectively to unexpected outbreaks and epidemics. WHO supports the government, working with Ministries, National Emergency Management Agency and other stakeholders to strengthen the national communicable disease surveillance and response systems through existing surveillance structures in the States and Local Government Areas (LGAs).

- WHO has supported Nigeria in the prevention, control and eradication of communicable diseases over several years. WHO support has mainly been for: Neglected Tropical Diseases (NTDs);
- *Dracunculiasis* (Guinea worm disease (GWD)),
- Human African *Trypanosomiasis* (HAT),
- *Buruli Ulcer* (BU),
- Lymphatic *filariasis* (LF),
- *Onchocerciasis*,
- *Schistosomiasis* and
- Leprosy.

Non-Communicable Diseases (NCDs), mainly cardiovascular diseases, cancers, chronic respiratory diseases and diabetes, are leading threats to human health and development in Nigeria. Africa's most populous country contributes substantially to the global burden. Four modifiable risk factors are

linked with these diseases, and primary prevention strategies are key to tackling them. The World Health Organization (WHO) developed the 2013-2020 Global Action Plan for the Prevention and Control of NCDs, which recommends multi-sectoral actions (MSA) as an overarching principle to underpin formulation and implementation of NCD policies. The document also stresses the need to integrate highly cost- effective, feasible and culturally acceptable interventions – termed ‘best buys’ – into country-level NCD prevention, control policies and plans, to accelerate results in terms of lives saved, diseases prevented, and costs averted. Nigeria developed some NCD policies in line with this global recommendation.

4.3.3.1 Access to Health Services in Nigeria

Healthcare provision in Nigeria is a concurrent responsibility of the three tiers of government in the country; Federal, States and Local Governments. Private providers of healthcare have a visible role to play in health care delivery.

The Federal government's role is mostly limited to coordinating the affairs of the university Teaching Hospitals, Federal Medical Centre (tertiary healthcare) while the state government manages the various general hospitals (secondary healthcare) and the local government focus on dispensaries (primary healthcare), which are regulated by the federal government through the NPHCDA.

The total expenditure on healthcare as % of GDP is 4.6, while the percentage of federal government expenditure on healthcare is about 1.5% (Oladimeji et al 2017). A long run indicator of the ability of the country to provide food sustenance and avoid malnutrition is the rate of growth of per capita food production; from 1970–1990, the rate for Nigeria was 0.25% (Oladimeji et al 2017). Though small, the positive rate of per capita may be due to Nigeria's importation of food products.

CHAPTER FIVE: POTENTIAL ENVIRONMENTAL & SOCIAL IMPACTS AND MITIGATION

5.1 Overall Context

The development of projects under RAAMP will improve the accessibility of farmers to the market while they will also be encouraged to increase their seed planting in order to increase yield. In addition, the amount of farm produce that becomes spoilt before getting the market due to lack of good road access will reduce drastically. Given these positive impacts and many more, the developments of projects under RAAMP will also have some negative impacts.

These adverse negative impacts are to be identified, assessed and managed through the application of appropriate mitigation measures, good E&S practice, sound design, good construction practices, effective maintenance, adequate supervision and enforcement during the project life cycle. As part of each project in the Program, E&S impact analysis of a sub-project (or project options) consists of comparing the expected changes in the biophysical and socioeconomic environment with and without the project. The potential impacts associated with the RAAMP projects across the states were identified using the ISS guidance materials on sector key sheets as well as observations and consultation during the ESMF field data collection.

5.2 Positive Impacts

5.2.1 Environmental Impacts

The following are some of the potential positive environmental benefits that could arise from the implementation of sub projects:

- Implementation of the RAAMP interventions across the selected states will improve physical landscape around farm settlements and markets, reduce erosions and help to improve soil stability.
- Rural road improvements will reduce the tear and wear on vehicles. The effect on overall vehicle operational costs will be positive and significant. This will significantly reflect in improved travel and waiting times, increased frequency of transport services and reduced transport costs along farms and market routes.
- RAAMP will help to improve the welfare and general well-being of beneficiary communities through increased access to health care, education and other social services, rendered closer due to enhanced accessibility during all seasons. It will provide benefits in

- respect of road safety or reduced accidents.
- The transportation of people and products between the communities will become faster and safer.
- The sub projects will bring new economic openings for women with the community based road maintenance scheme as well as improvement in the agriculture and trading sectors.
- Developing new roads or rehabilitating existing roads often improve personal well-being. Access to farmlands and markets to sell farm produce will help improve the economic wellbeing of farmers and market traders.

5.2.2 Positive Social Impacts

- Road improvement provides socio-economic benefits as accessibility and commercial activities are enhanced to facilitate economic integration at all levels. It helps in the development of various economic activities due to open access.
- Enhanced agricultural marketing potentials and access to agro processing centres will lead to increased agricultural production which in turn will lead to increase in employment opportunities. It will also reduce out- migration in search of jobs in the urban centres. In the construction phase, opportunities for skilled as well as unskilled labour will be available to earn income.
- At the local level, trading in farm produce will improve as production levels are increased and diversified and access is gained to wider markets. This will contribute to GDP growth. The construction of new and motorable roads will bring development along the road corridors, including the development of small and medium scale enterprises such as cassava processing factories, rice mills, palm oil factories and many others. Incomes earned directly or indirectly will bring improvements in the standard of living of the people involved with the sub projects.
- As more settlements spring up following the new road intervention, women will expand their opportunities for catering and trading, since there will be increased demand for food, goods and services, both in the construction and operation phases. Road availability will indirectly benefit women by easing the drudgery of long distance walking with children to health care centres, etc.

5.3 Negative E&S Impacts and Mitigation Measures

The envisaged negative impacts of the sub-projects are presented in Table 5.1 with the recommended mitigation measures.

Table 5.1. Potential E&S Impacts of Projects under RAAMP (non-exhaustive) and Mitigation Measures

Impact	Mitigation
Geology/Hydrogeology <ul style="list-style-type: none"> • Interruption of hydrogeology and groundwater flows from excavation and ground clearance. 	<ul style="list-style-type: none"> • Detailed alignment to take account of local groundwater conditions, e.g. by avoiding areas with springs or where the water table is shallow. • Limit sealed or compacted areas as much as possible, to maintain natural recharge of the water table • Avoid removing material below the water table.
<ul style="list-style-type: none"> • Pollution of soil, surface and groundwater from discharges and accidental releases. 	<ul style="list-style-type: none"> • Ensure that all forms of discharges and accidental releases are prevented. • Installation of sewage treatment to treat storm water and effluents from contractor's camp.
Soils, Run-off and Flooding <ul style="list-style-type: none"> • Loss of soil / sediments and pollution of watercourses, and interruption of drainage patterns, as a result of ground clearance and earthworks. 	<ul style="list-style-type: none"> • Minimization of cleared areas and soil disturbance, with revegetation as soon as feasible, with native species. • Early installation and regular maintenance of drainage and diversion structures, silt traps, etc.; drainage outlets to discharge into vegetated areas if possible; vegetation along watercourses and drainage lines to be retained if possible. • Avoidance of areas liable to flooding, slope instability, and water crossings where possible. • Retention of topsoil for restoration (including tilling and revegetation) as soon as practicable. • Restrictions on work and other activities around waterbodies (e.g. vehicle washing), and minimization measures around water crossings where this not possible. • Careful design: e.g. alignment, minimal diversion, timing of works (overall duration and seasonality).
<p>Release of hazardous substances during construction, or operation (e.g. vehicle spills) leading to soil, surface or groundwater contamination.</p>	<ul style="list-style-type: none"> • Materials handling and control procedures. • Control of construction vehicle movements and prohibition of vehicle washing in watercourses, and similar practices. • Emergency response plans during construction (contractors and local authorities) and operation (local authorities).
Air Quality <ul style="list-style-type: none"> • Dust from construction, and other emissions during construction and operation, could affect human health, vegetation (including crops) and wildlife. 	<ul style="list-style-type: none"> • Sensitive local route selection and siting of construction facilities. • Implement dust control and suppression measures like water sprinklers. This should be done during operational phase of the • No use of ozone depleting substances during construction

Emissions from vehicles and other earth moving equipment can affect sensitive receptors (human and flora/fauna).	<ul style="list-style-type: none"> • Sensitive route selection, grading of inclines, etc. • Speed controls and other traffic calming measures to reduce excessive acceleration around towns. • Use modern equipment with appropriate emissions standards, and regular preventative maintenance
Noise and Vibration <ul style="list-style-type: none"> • Noise and vibration from equipment, traffic and activities during construction (and maintenance) at worksites and associated facilities, may disturb sensitive noise receptors (human and fauna). 	<ul style="list-style-type: none"> • Sensitive local route selection, grading of inclines, etc. and siting of construction facilities. • Use of modern equipment fitted with abatement devices (e.g. mufflers, noise enclosures); good maintenance regime. • Strict controls of timing of activities, e.g. blasting and other high noise emissions; prohibition on night working if possible depending on their location. • Observance of seasonal sensitivities (e.g. breeding seasons), and alteration of activity to reduce noise levels at that time. • Speed controls and other traffic calming measures to reduce excessive acceleration around settlements/sensitive receptors.
Noise and vibration from traffic during operation may disturb sensitive noise receptors (human and fauna).	<ul style="list-style-type: none"> • Sensitive local route selection (e.g. by-passes around communities, grading of inclines), and siting of permanent facilities. • Speed controls and other traffic calming measures to reduce excessive acceleration near settlements/sensitive receptors
Resources and Waste <ul style="list-style-type: none"> • Construction (and possibly operation) will require supply of water from surface or groundwater, which could affect existing supply for human communities and ecosystems. 	<ul style="list-style-type: none"> • Water study prior to any abstraction, to inform a Sustainable Water Management Plan. • No abstraction without prior approval of relevant authorities at all locations. • Promotion of water efficiency (including leak detection, preventative maintenance of equipment) and water recycling.
<ul style="list-style-type: none"> • Inefficient waste management during construction and maintenance leading to excess materials consumption, generation of wastes/emissions, soils and water pollution. 	<ul style="list-style-type: none"> • Preparation of Waste Management Plan following the waste hierarchy, supported by staff training. • Earthworks to be designed to achieve a balance between cut and fill wherever possible. • Use of authorized contractors for hazardous and any other wastes which the project cannot dispose of safely.
<p>Loss, fragmentation and degradation of habitat, and severance of animal migration routes and pathways</p> <ul style="list-style-type: none"> • Land clearance for new roads and upgrading of existing roads may cause loss or fragmentation of 	<ul style="list-style-type: none"> • Careful route selection and siting of all project components, with advice from biodiversity authorities/wildlife specialists. • Wherever feasible, establishment of buffer zones around conservation areas, watercourses, and other locations identified as ecologically sensitive and avoidance or minimization of activity within these zones.

protected areas and other areas of conservation interest, and degradation following poorly managed rehabilitation.	<ul style="list-style-type: none"> Rehabilitation of cleared areas with native species, and ecosystem restoration in habitats of conservation value, using specialist advice and input, backed up by a long-term monitoring programme and corrective actions as necessary.
<ul style="list-style-type: none"> Severance of terrestrial routes and watercourses used for migration or for access to feeding and breeding areas. 	<ul style="list-style-type: none"> Sensitive planning of road alignments. Wildlife crossings for terrestrial animals, and design of culverts/
<ul style="list-style-type: none"> Construction impacts on habitats and species (e.g. from changes in drainage, soil erosion, pollution of water, soils or air, introduction of invasive species, and general human disturbance). 	<p>Where development in sensitive areas cannot be avoided, mitigation may include:</p> <ul style="list-style-type: none"> Minimization of area impacted, clear demarcation of remaining intact areas of habitat, and prohibition of activity into those areas for any purpose; maintenance of wildlife corridors between fragmented areas wherever possible. No ground clearance upstream of sensitive areas unless appropriately engineered drainage installed. Habitat rehabilitation and ecosystem restoration of areas no longer required after construction, as soon as possible. If loss of Critical Habitat is inevitable, development/implementation of an Offsets Programme.
<p>Impacts from Induced Access</p> <ul style="list-style-type: none"> Road developments into remote areas will facilitate access, and can lead to land clearance for agriculture, and increased disturbance and pressure on natural resources through bush meat hunting, logging, fire, etc. 	<ul style="list-style-type: none"> Careful route selection and siting of all project components, with advice from biodiversity authorities/wildlife specialists to avoid remote and previously inaccessible areas where possible. A construction camp siting strategy regarding siting to avoid attracting people towards more remote areas, where possible. Restrictions on access to all temporary access roads, and their removal after construction. Prohibition on workforce hunting, selling, or purchasing bush meat, and training to support this requirement.
<p>Direct Impacts on Flora and Fauna</p> <ul style="list-style-type: none"> Clearance of vegetation may lead to loss of plant species and habitat of conservation interest 	<ul style="list-style-type: none"> Careful route selection and siting of all project components, with advice from biodiversity authorities/wildlife specialists. Careful planning of phasing and timing of construction activities. Demarcation and avoidance of areas of conservation interest (high value species, feeding or breeding sites, migration routes, etc.) where possible, and wildlife rescue and translocation where appropriate, under expert supervision.
Invasive Species	<ul style="list-style-type: none"> Staff training and awareness raising in communities.

<ul style="list-style-type: none"> • Introduction of invasive species during rehabilitation of burrow pit and contractor's camp which can adversely impact fauna, flora, ecosystems, and crops. 	<ul style="list-style-type: none"> • No introduction of exotic species (e.g. for site rehabilitation) without specialist vetting and government approval.
<p>Physical and Economic Displacement of People, Property, Assets and Resources</p> <ul style="list-style-type: none"> • Development or upgrading of roads may physically displace people, or lead to the loss of assets. 	<ul style="list-style-type: none"> • Careful route selection and siting of all project components, and avoid occupation of areas which are inhabited or regarded as of high value by communities (e.g. horticulture, community orchards) where possible. • Early development and sensitive implementation of resettlement planning, in accordance with national regulations and international good practice to compensate for any losses (both physical and economic).
<p>Economic Development and Employment</p> <ul style="list-style-type: none"> • Direct employment of local population in workforce, and stimulation of local economy through demand for goods and services will enhance livelihoods and economic activity in local communities, but potentially adverse effects if community relations are not well managed. 	<ul style="list-style-type: none"> • Development of an Employment Plan, with clear employment requirements and procedures for the construction workforce. • Transparent and culturally appropriate communication with communities regarding employment opportunities. • Fair and transparent hiring and staff management procedures. • Employment requirements and vocational training plan to be agreed with local institutions, so that local people can be trained to meet the project's needs in a timely fashion. • Development of measures to manage the transition after construction is complete, including SME development, ongoing opportunities for the workforce in road management and maintenance, reskilling and alternative employment.
<p>Community Health, Safety and Security</p> <ul style="list-style-type: none"> • Poor construction management practices may lead to adverse effects on safety, human health and wellbeing. 	<ul style="list-style-type: none"> • Good construction site "housekeeping" and management procedures (including site access). • Disease control measures, e.g. no pools of standing water, rodent control, treatment of water. • Risk assessments and emergency response planning to consider impacts on local communities.
<ul style="list-style-type: none"> • Interaction between workforce and local communities may increase occurrence of communicable diseases, including HIV/AIDS and sexually transmitted diseases (STDs). 	<ul style="list-style-type: none"> • Implementation of a health management system for the construction workforce, to ensure it is fit for work and that it will not introduce disease into local communities. • Training and awareness training for workforce and their dependents on HIV/AIDS and other STDs, and communicable diseases including malaria; health awareness raising campaigns for communities on similar topics
<p>Workforce-Community Interactions</p> <ul style="list-style-type: none"> • Real or perceived disruption to normal community life, through the 	<ul style="list-style-type: none"> • Adoption of a Stakeholder Engagement Plan, as a framework for early and ongoing community consultation • Implementation of a Grievance Procedure.

physical presence of a construction workforce.	<ul style="list-style-type: none"> • Works procedures, defining a Code of Appropriate Conduct for all workers. • Training for all staff in acceptable behaviour with respect to community interactions.
Increased security risks due to storage of materials and equipment on site	<ul style="list-style-type: none"> • Deploy competent security personnel to secure project site. • Provide adequate training of security personnel. • Disclose site security arrangements to the Police and host communities
Labour and Working Conditions <ul style="list-style-type: none"> • Poor management of occupational health and safety could lead to accidents, injuries and illnesses among workers; mental health issues may arise due to remote or enclosed living. • Differences in nationality, ethnicity, religion, etc. may lead to discrimination and harassment, and differences (perceived or real) in working conditions between workers may lead to resentments. 	<ul style="list-style-type: none"> • Employment practices and working conditions should conform to International Labour Organization (ILO) Standards and national regulations. • Rest and recreational facilities and time should be provided, and rules on alcohol and drugs defined and clearly communicated to workers. • The basis for differences in the standard of accommodation should be non-discriminatory; it should be documented and communicated transparently to the workforce. • Clear and comprehensive health and safety reporting and grievance procedure system should be established, and be freely available to all of the workforce.
Improperly abandoned borrow pits	<ul style="list-style-type: none"> • Reuse excess stockpile to back fill pits during grading • Revegetate with appropriate plant species
Security Challenges during project implementation. <ul style="list-style-type: none"> • Security threats to project implementation especially in Borno and Taraba States. 	<ul style="list-style-type: none"> • Work with all security agencies to provide security for contractors during project implementation. • Consult the local communities to improve security awareness during project implementation.

CHAPTER SIX: ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES AND REQUIREMENTS

6.1 Environmental, Health and Safety Guidelines to be implemented by the RAAMP

In order to ensure E & S considerations are carefully identified and mainstreamed in all the sub-projects of the RAAMP, both the requirements of the Nigerian legislation as well as the AfDB Operational Safeguards will be adopted. In addition, the internationally accepted guidance on environmental, social, health and safety mitigation measures for infrastructural development projects as detailed in the World Bank Group (WBG) EHS Guidelines will also be mainstreamed. To ensure adequate implementation, the operational safeguards and other EHS guidelines will be incorporated into the design and implementation of the ESIAs/ESMPs, as well as other applicable E & S risk management tools for all sub-projects considered under the Program.

The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable at reasonable cost by commercially available technology. The discharged effluent, air emissions, and other numerical guidelines and performance indicators, as well as other prevention and control approaches included in the EHS Guidelines, are considered to be default values applicable to new projects, though the application of alternative performance levels and measures may also be considered.

The General EHS Guidelines include guidance on a comprehensive range of environmental, occupational health and safety, community health and safety and construction and decommissioning topics. They should be used in parallel with the accompanying Industry Sector EHS Guidelines. The General EHS Guidelines are summarized in Table 6.1 below.

Table 6.1. Summary of WBG General EHS Guidelines

1	Environmental	2	Occupational Health and Safety
1.1	Air Emissions and Ambient Air Quality	2.1	General Facility Design and Operation
1.2	Energy Conservation	2.2	Communication and Training
1.3	Wastewater and Ambient Water Quality	2.3	Physical Hazards
1.4	Water Conservation	2.4	Chemical Hazards
1.5	Hazardous Waste Management	2.5	Biological Hazards

1.6	Waste Management	2.6	Radiological Hazards
1.7	Noise	2.7	Personal Protective Equipment (PPE)
1.8	Contaminated Land	2.8	Special Hazard Environments
		2.9	Monitoring
3	Community Health and Safety	4	Construction and Decommissioning
3.1	Water Quality and Availability	4.1	Environment
3.2	Structural Safety of Project Infrastructure	4.2	Occupational Health & Safety
3.3	Life and Fire Safety (L&FS)	4.3	Community Health & Safety
3.4	Traffic Safety		
3.5	Transport of Hazardous Materials		
3.6	Disease Prevention		
3.7	Emergency Preparedness and Response		

Source: IFC/WBG (2007)¹

6.2 Environmental and Social Assessment Procedure

The AfDB ESAP describes how the Bank and its borrowers should work together to ensure that E & S and climate change considerations are integrated into the project cycle from country programming to post project completion. It represents a coordination mechanism between the Bank, relevant government agencies and private sector entities and plays an important role in building the E & S and climate change management capacity of the project's executing agency. The adoption and implementation of this ESAP for the RAAMP will enhance the E & S performance and improve project outcomes.

Reliance on the provisions of the ESAP will help to improve decision-making and project results by ensuring that sub-projects under the program conform to the requirements laid out in the operational safeguards (OS) and are thus sustainable. Effective implementation of the ESAP will help to avoid incurring costs and implementation delays as a result of unanticipated problems. It will also reduce the need for project conditionality as remedial measures can be taken in advance and incorporated into project design or project alternatives can be considered.

More specifically, adopting and implementing ESAP for RAAMP will ensure the observed gaps with regards to the Nigerian E&S requirements are adequately

¹ Environmental, Health, and Safety General Guidelines. 30 April 2007. Available at <https://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final+-+General+EHS+Guidelines.pdf?MOD=AJPERES> [Accessed 26/04/18]

managed by AfDB ISS requirements in accordance with internationally recognized E&S risk management standards to ensure project sustainability.

The AfDB E&S Assessment Procedures for categories 1 & 2 projects are summarized in Figure 6.1. A detailed description of the approaches to be adopted in relation of E & S management at each stage of the overall project cycle (i.e. project identification, preparation, appraisal, implementation and completion and post completion) is presented in Table 6.2.

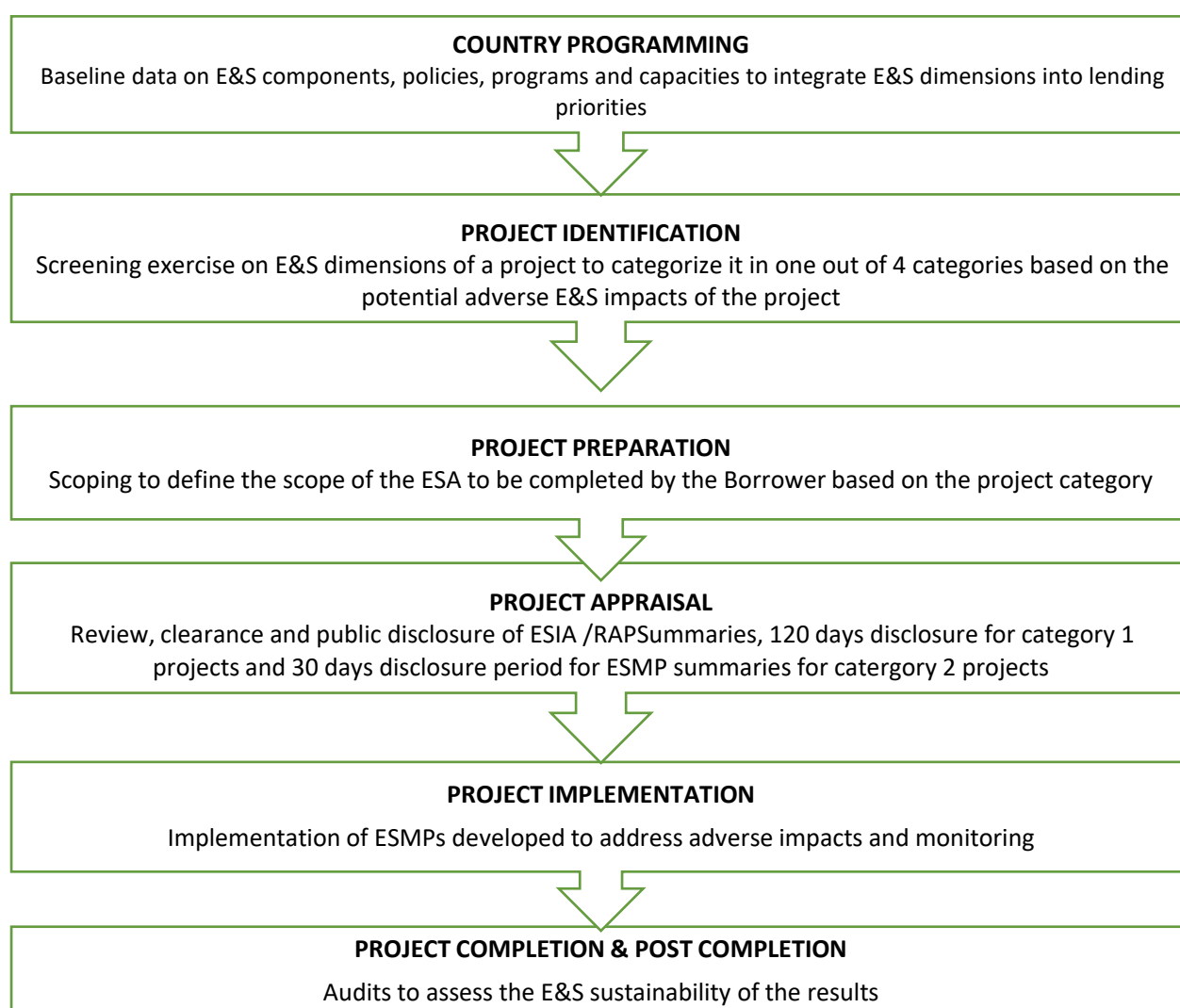


Figure 6.1. ESAP Process

Table 6.2: AfDB E & S Process for Category 1 and 2 Projects

Step	Responsibility	Output
Project Cycle Phase 1: Country Programming		
Country/Regional Departments, with Sector Department support, develop and update Country Strategy Paper (CSP) and Regional Integration Strategy Paper (RISP) to mainstream E&S and climate change considerations. Relevant E&S concerns are inserted into the Integrated Safeguards Tracking System (ISTS).	Country / Regional Departments	<ul style="list-style-type: none"> E&S and climate change content in CSPs and RISPs Initiate ISTS
Project Cycle Phase 2: Project Identification		
Regional Member Country (RMC), with Sector Department support, provides baseline data for screening/scoping. In addition, the RMC shall provide internal screening/ scoping.	RMC (supported by Sector Departments)	<ul style="list-style-type: none"> E&S and climate change baseline data Screening information based on national systems
Sector Departments conduct screening/scoping to determine the project category	Sector Departments	Draft Request for Categorization Memorandum (RCM)
The Compliance and Safeguards Division reviews Category, revises if necessary and validates Category	The Compliance and Safeguards Division	<ul style="list-style-type: none"> Categorization of project Updated ISTS
Project Cycle Phase 3: Project Preparation		
Sector Departments notify borrower of Category and specify ESA studies required.	Sector Departments and Borrower	Project category notification
RAAMP prepares TOR for ESIA studies.	RAAMP (supported by Sector Departments)	Draft TOR for ESIA studies
Sector Departments review TOR for ESIA studies and provide comments to borrower	RAAMP (supported by Sector Departments)	Finalized TOR for ESIA studies
RAAMP begins to prepare ESIA studies	RAAMP (supported by Sector Departments)	Initial work to prepare draft ESA Studies
Sector Departments integrate relevant information from TOR of ESIA studies into Project Concept Note (PCN).	Sector Departments	Integration of relevant information from TOR of ESIA studies into (PCN)
PCN is subject to Readiness Review (for public sector projects). The Compliance and Safeguards Department engages in compliance check	Compliance and Safeguards Department	<ul style="list-style-type: none"> Satisfactory rating Satisfactory compliance check and updated ISTS
Project Cycle Phase 4: Project Appraisal		
Once ESIA studies have been prepared, Sector Departments review them and provide comments to RAAMP.	Sector Departments	Comments on ESIA studies
RAAMP finalizes ESA studies.	RAAMP	Final ESIA studies

Step	Responsibility	Output
Sector Departments review final ESIA studies, prepare summaries and submit summaries and main ESIA to the Compliance and Safeguards Division for clearance.	Sector Departments	<ul style="list-style-type: none"> ESIA studies and summaries Request for Review and Clearance
ESIA studies are disclosed in Nigeria by RAAMP	RAAMP	Disclosure of ESIA in Nigeria
The Compliance and Safeguards Department reviews and clears ESIA studies summaries and issue Environmental and Social Compliance Note (ESCON) to Sector Department including conditions for loan agreements.	Safeguards and Compliance Department	<ul style="list-style-type: none"> Clearance of ESA Studies Memorandum ESCON
Sector Departments provide synopses of ESIA studies for Project Appraisal Report (PAR) compliance check and disclose summaries after clearance from the Compliance and Safeguards Division	Sector Departments	<ul style="list-style-type: none"> Integration of summaries into PAR Disclosure of summaries in AfDB's website
PAR is subject to Readiness Review (for public sector projects). For both public and private sector projects, the Compliance and Safeguards Department engages in compliance check, prior to PAR being submitted to Country Team Meeting and for Ops Com approval. The Compliance and Safeguards Department also checks issuance of ESCON and updates the ISTS as applicable.	The Safeguards Compliance Department (SNSC)	<ul style="list-style-type: none"> Satisfactory rating in appropriate section of Readiness Review Satisfactory compliance check Updated ISTS
Project Cycle Phase 5: Loan Negotiations, Board Presentation and Loan Signature		
Sector Departments prepare loan conditions and covenants.	Sector Departments	Draft E&S loan conditions and Covenants
General Counsel and Legal Services Department (GECL) integrates E&S loan conditions and covenants into the project loan agreements.	Sector Departments and GECL	Integration of loan conditions and covenants into Project Loan Agreement
The borrower enters loan negotiation with AfDB		Project loan agreements
Project Cycle Phase 6: Project Implementation and Supervision		
Sector Departments review Quarterly Implementation Reports, engage in supervision missions, and request borrower to revise ESMP/ESMS (if required) with clearance from the Compliance and Safeguards Division.	RAAMP	ESMP/ESMS implementation information in Quarterly Implementation Reports
If complaints are received from non-compliance, the Bank's mediation process is triggered through the Office of Compliance and Review Mechanism (CRMU). The Compliance and Safeguards Division prepares the Management Response and updates the ISTS.	Sector Departments, the Safeguards and Compliance Department, and CRMU	<ul style="list-style-type: none"> Management responses Updated ISTS
Project Cycle Phase 7: Project Completion		

Step	Responsibility	Output
Sector Departments prepare E&S content of PCR and integrate into ISTS for Compliance and Safeguards Department to review	Sector Departments, Safeguards and Compliance Department	<ul style="list-style-type: none"> Updated ISTS E&S contents reviewed
Project Cycle Phase 8: Post Completion		
For selected projects or sector operations, Operations Evaluation Department (IDEV) evaluates E&S dimensions of medium-term outcomes and long-term impacts after project completion.	IDEV	Project Performance Evaluation Report

6.3 Environmental and Social Management for the Program

There are several institutions regulating E&S matters in the country in general and the sector in particular, this divergence undermines Nigeria's ability regulate and enforce environmental, social and climate matters effectively, therefore the AfDB ISS which is assessed to be more robust than the country systems shall be used to compliment the country system and where there are disparities, the AfDB ISS shall take precedence in the RAAMP E&S studies. The sub-projects under RAAMP are all likely to be Category 2 projects with the requirements for the preparation of an ESIA/ESMP and abbreviated RAP (FRAP/ARAP). This ESMF provides the framework for which the E & S studies will be undertaken once all roads and agro logistics hubs have been identified and design considerations have been finalized to a sufficient detail, to enable the preparation of the ESIA, ESMPs and FRAP/ARAPs

The Program will use the ESMF as the tool for ensuring that E&S aspects are considered during decision making by influencing design to avoid /minimize, and where unavoidable mitigating the residual adverse impacts and/or enhancing positive impacts. The outline contents for each ESIA, ESMP, RAP as well as other plans under the sub-projects shall be in accordance with local legislation and also adhere to AfDB requirements.

6.3.1 Environmental and Social Impact Assessment (ESIA) Studies

The ESIA studies will take into accounts the AfDB's safeguard as well as the country system requirements as outlined in the Nigerian Environmental legislations. The typical scope of work for the preparation of ESIA and related studies include the following:

- i. Defining the scope and contents of ESIA study in line with the already completed screening, and the lender requirements

- ii. Development of Scoping Report (including detailed constraints mapping) and Stakeholders Engagement Plan
- iii. Obtaining information from primary or secondary sources regarding the current conditions of E&S features within the influence area of the sub-project (review of baseline).
- iv. Carrying out effective stakeholder consultations, including along the proposed sub-project impact zone. This shall also include affected communities whose livelihood may be impacted due to the sub-projects in the RAAMP.
- v. Identifying feasible alternatives for proposed layout changes, use of alternative technologies, etc. in close collaboration with the Design team.
- vi. Identifying and estimating quantitatively (to the extent possible), key impacts and classify these for ease of understanding and determination of significance (by severity, duration, project phase, etc.)
- vii. Selecting measures that can help manage these impacts in cost effective manner – reduce the negative ones; and enhance positive ones and estimate the residual impacts, including those that may need further study.
- viii. Clarifying the institutional arrangements, any capacity building needs, and resource requirements including grievance redress mechanism and budget as part of the preparation of E&S management plan.

Having identified the probable adverse impacts, the next step shall involve quantification of the impacts and develop E&S action plans to mitigate such adverse impacts.

The typical content an ESIA should be as per Annex 7 of the AfDB ESAP². All ESIA's and ESMPs prepared for subprojects under the RAAMP will need to adhere to the guidance in the AfDB ESAP.

2

https://www.afdb.org/fileadmin/uploads/afdb/Documents/Publications/SSS_%E2%80%93vol1_%E2%80%93Issue4_-_EN_-_Environmental_and_Social_Assessment_Procedures_ESAP_.pdf

6.3.1.1 Key E&S issues to be addressed during ESIA and RAP studies

This section outlines key issues with potential to lead to major E&S impacts during implementation and operation of the program sub-projects. It should be emphasized that these are potential issues only, the probability of leading to an impact, severity of the E&S outcomes, and the level of significance should be assessed further during the ESIA studies of individual sub-projects. In addition, feasible and cost-effective mitigation measures should also be included for all impacts identified to be significant. The emphasis placed on these issues is necessary in view of the preliminary assessment of sub-project locations and envisaged project activities especially during the pre-construction and construction phases of project implementation.

Major E&S Issues

Based on field visits for data collection in September 2019, the following Environmental and social issues were identified in the indicative project area of influence and will need to be assessed in the ESIAs for individual subprojects.

- **Displacement along ROW and Compensation**

Inevitably, rehabilitation of rural roads will require displacement of people farming or doing business along the right of Way. Based on field visits and consultations, few crops and economic trees will be encountered along the ROW of some of the roads and this will require compensation. Also as part of site specific E & S studies, the potential for physical and economic displacement should be investigated in details and appropriate mitigation measures proposed.

Key Environmental Considerations

Release of Dust during construction most importantly if done during dry season. Since the roads will require cutting and filling as well as surface dressing for 3 states, dust release is inevitable.

Loss of trees contributing to carbon sequestration: Clearing the ROW for the rural roads will require the removal of some trees that are contributing to carbon sequestration. The removal of trees has climate change impacts and will require replacements at nearby locations. So as part of E & S studies,

mature trees along the RoW shall be enumerated and information obtained shall be used to ensure that any future tree planting program can deliver net biodiversity gains.

There are drainage issues leading to localized erosion. Road designs will need to consider this and ensure that drainages from rural roads are channeled to link with bigger drains where runoff from the roads will not end up within farmlands.

- **Stakeholder Engagement**

The project affected persons and communities (PAPs/PACs) should be adequately engaged with as part of the ESIA and RAP processes. The consultation needs to be detailed and broad based with all Project Affected Persons and Communities and ensure that their concerns are addressed in a timely manner. All consultation undertaken must be Free, Prior and Informed and Consented (FPIC) with PAPs/PACs having an understanding of the Grievance Redress Process for the project. Federal, State and Local Governments are also important to be included in the consultations.

For each of the subprojects in the RAAMP, there is also the need to develop detailed **Stakeholder Engagement Plans (SEPs)** that will inform the planning and preparation for any field works related to engagement with PAPs. The SEP should be a live document, which will be implemented continuously throughout the life of RAAMP. In addition, as part of SEP implementation, the ESIA should include a fit and proper Grievance Redress Mechanism (GRM) for the project, which is known to all PAPs/PAC and can be used by all stakeholders to express their concerns. This should include addressing issues of use of land in selected project sites, impacts on livelihoods, community engagements, encroachment, etc.

- **Gender Considerations**

Gender issues including GBV and SEA should be duly considered during ESIA study as women are more prone to the effects of economic displacements. Roadside farming are mainly done by women because of its proximity. Therefore women are more likely to be more displaced than men hence the need of gender consideration especially for the project in Northern region. Efforts should be made to hold consultations with women group and document their concerns and needs. Gender disaggregated data should be

collected during the socio-economic survey. Issues affecting women should be documented including poverty, child labour, illiteracy/ignorance, child marriage, religious practices and social stratification/family background. Opportunities for women during project implementation and operation should be explored and recommended.

This is in view of the fact that Nigeria is now ranked 125 out of 145 on the 2015 Gender Gap Index countries with a score of 0.638. On the AfDB Gender Equality Index 2015, Nigeria is ranked 23rd out of 52 countries. The AfDB Index reflects women's status in three dimensions of equality: economic opportunity, social development and law and institutions. Generally, women, compared to men, lack access to employment opportunities because of low investment in their human capital, especially their low level of education and lack of skills appropriate for formal labour employment.

- **Hazardous Waste**

The ESIA should provide details of all envisaged waste to be generated during construction particularly hazardous waste. It is envisaged that waste stream will include spent oils which is a very potent environmental pollutant. Other hazardous waste streams may include batteries, lubricants, hazardous containers amongst others. It is crucial to design appropriate Waste Management Plans (WMP) as part of ESIA to guide contractors in the management of these class of waste to prevent environmental pollution and attendant public health catastrophe.

6.3.2 Environmental and Social Management Plans (ESMP)

Environmental and Social Management Plans (ESMPs) are the key tools to structure projects to ensure that E & S impact mitigation measures are effectively implemented during the construction, operational and decommissioning phases of the project. They are also a key tool to support the process of monitoring the environmental performance of a project throughout its lifecycle. RAAMP is required to take into account the findings of the E&S assessment process and the outcomes of stakeholder engagement in order to develop and implement a program of actions to address the identified E&S impacts and issues of the project as well as to determine any performance improvement measures to meet the required E&S standards.

Based on the field visits undertaken during the preparation of this ESMF, it is expected that the ESIA covering the roads and agro-logistics hubs in each state will result in the preparation of ESMPs that will include the following specialized management plans:

- Emergency and Spill Response Plans
- Traffic Management Plans
- Chance Find Procedure
- Health & Safety Management plan.

NB: this is a non-exhaustive list and the specialized management plans must be developed as determined by the outcomes of the ESIA process.

CHAPTER SEVEN: APPROACHES TO BE ADOPTED RELATING TO INVOLUNTARY RESETTLEMENT

7.1 Introduction

The roads associated with the RAAMP project are rural roads with a RoW covering up to a maximum of 12m width. Based on the field visits undertaken during the preparation of this ESMF, there is the potential for economic and physical displacement to enable construction of the road. Economic and physical displacements will be related to removal of some economic trees and crops while few business activities involving makeshift shops will be required to shift backward.

In accordance with Nigerian regulations (Land Use Act of 1978 as amended in 2004) and the AfDB's ISS Operational Safeguards 2 (OS2), there is the need to compensate project affected persons (PAPs) whose livelihood depend on the land taken up for road construction.

7.2 Benchmarking of Relevant Nigerian Legislation and the AfDB's OS2.

The primary difference between national legislation and AfDB's resettlement standards is that Nigerian law concentrates on compensation for lost assets, whereas the AfDB Safeguard have an additional focus on livelihood enhancement (or, as a minimum, restoration). Emphasis is not only on compensation for lost assets but also on assisting people to improve (or at least restore) standards of living, incomes, and livelihoods. This includes providing access to income-earning opportunities such as agricultural production or to natural resources deemed critical for subsistence.

Nigerian legislation does not provide any compensation for the value of lost land (except for reimbursement of any rent paid by the occupier during the year in which the right of occupancy was revoked). **OS2 of the AfDB stipulates that affected people are compensated for all their losses at full replacement costs before their actual move; before land and related assets are taken; and, if the project is implemented in phases, before project activities begin for each particular phase.** The borrower or client gives preference to land-based resettlement strategies and as a matter of priority offers land-to-land compensation and/ or compensation-in-kind in lieu of cash compensation where feasible; further, the borrower or client clearly explains to affected people that cash compensation very often leads to rapid impoverishment.

With regard to loss of access to commonly held resources, Nigerian legislation provides that, where a right of occupancy of land owned by the community is revoked for public purposes, compensation for unexhausted improvements on the land, taking account of depreciation, may be paid to the community at the relevant governor's discretion and such payment may be to the relevant chief on behalf of the community or into a specially designated fund

for the benefit of the community. OS2 on the other hand provides for compensation to offset restrictions on access to communal resources. Assistance measures may include initiatives to enhance the productivity of the remaining resources, to which the community will continue to have access, in-kind or cash compensation for the loss of access, or access to alternative sources of the lost resource.

RAAMP will follow the Nigerian legislation and will also implement such additional measures as necessary to achieve outcomes that are consistent with AfDB OS2 requirements.

Table 7.1 below compares the AfDB Operational Safeguard 2 (OS2) and to Nigerian legislation for those categories of displacement impacts that Project activities are expected to incur. The table also prescribed what will be adopted for RAAMP.

Table 7.1: Benchmarking of Nigerian Law and principles of the AfDB on Involuntary Displacement

Category	Nigerian Legislation (Land Use Act)	AfDB OS 2	To be adopted by the RAAMP
Minimise Land Take and Involuntary Displacement	Explore all viable alternative project design options to ensure minimisation of impacts (Land Use Act of 1978)	Project proponent to consider feasible alternative project designs, including re-siting and re-routing, to avoid or minimise physical or economic displacement.	AfDB OS 2
Consultation and Disclosure	A notice of acquisition is usually prepared by the Ministry of Lands, in conjunction with the survey description. This notice is then published in two newspapers (one national and one local and the government gazette	Open, inclusive and effective consultation with local communities is required	AfDB OS 2 and Land use Act
Eligibility	Under Nigerian legislation, all land rights constitute occupancy rights rather than ownership rights and accordingly eligibility for compensation for loss of land is not provided for. Anyone possessing a statutory or customary right of occupancy to affected land is entitled to compensation for unexhausted improvements made to that land. Encroachers are not recognised as an eligible group, and are thus not entitled to any compensation provisions.	<p>AfDB identifies three groups of displaced people that shall be entitled to compensation or resettlement assistance for loss of land or other assets taken for project purposes:</p> <ul style="list-style-type: none"> • Those who have formal legal rights to land or other assets recognised under the laws of the country concerned. • Those who may not have formal legal rights to land or other assets at the time of the census / asset survey but can prove that they have a claim that would be recognised under the customary laws of the country. <p>Those who have no recognisable legal right or claim to the land they are occupying in the project area of influence, and who do not fall into either of the two categories described above, but are entitled to resettlement assistance in lieu of compensation for land to improve their former living standards (compensation for loss of livelihood activities, common property resources, improvements (structures and crops) etc.).</p>	AfDB OS 2

Category	Nigerian Legislation (Land Use Act)	AfDB OS 2	To be adopted by the RAAMP
		provided that they themselves or witnesses can demonstrate that they occupied the project area of influence for a reasonable time (at least six months) prior to a cut-off date established by the borrower or client and acceptable to the Bank.	
Census and Asset Inventory	A survey to record the dimensions of the affected land parcels needs to be carried out. The enumeration process is asset driven and not household driven. There is no particular format which is currently used by the Land Department. The process mostly comprises of generic questions that are administered orally.	A census, asset inventory and comprehensive socioeconomic survey is required with gender disaggregated information.	AfDB OS 2
Livelihood	No provisions	Strategies to improve livelihoods of PAPs are required.	AfDB OS 2
Gender	No provisions	Special consideration has to be paid to the needs and rights of women. In the context of gender vulnerability, the client must give careful consideration to actively facilitating consultation with both women and men in ways that are sensitive to the social and political constraints and barriers that women and men may face. The land-taking report (RAP or LRF/LRP) must include a specific protocol specifying safeguards for the quality and quantity of land to be allocated to women, especially widows and divorcees, to ensure their means to generate income and achieve food security. Specifically, applicable to resettlement, land titles at the resettlement site are to be in the name of both spouses or of single heads of household, regardless of gender, if this does not conflict with the borrower or client's own laws and legislation. Compensation payments to families are made to both husbands and wives when this is	AfDB OS 2

Category	Nigerian Legislation (Land Use Act)	AfDB OS 2	To be adopted by the RAAMP
		technically feasible and socially acceptable.	
Cut-off date	Though a cut-off date is not defined by Nigerian legislation, there is a six-week notice period given for land to be acquired by a Project. This is not, however, a formal cut-off date.	There is a requirement to establish a cut-off date for eligibility that is acceptable to project financiers/lenders. The borrower or client documents the cut-off date and disseminates information about it throughout the project area of influence in a culturally appropriate and accessible manner, before taking any action on clearing land or restricting local community access to land.	AfDB OS 2
Timing of Compensation	Once the compensation amounts have been discussed with the affected people.	Compensation is to be made before land and related assets are taken; and, if the project is implemented in phases, before project activities begin for each particular phase.	AfDB OS 2
Compensation	Cash compensation is generally made based upon government rate as well as depreciation value. Whilst in principle there is allowance for in-kind compensation or replacement of assets, cash compensation is common practice	PAPs are compensated for all their losses at full replacement cost. PAPs can be offered a range of different compensation packages, resettlement assistance, and livelihood improvement options. Engagement is key to determine the appropriate compensation packages.	AfDB OS 2
Communal resources	Section 29 sub section 3 only provides for compensation where the holder or the occupier of land entitled to compensation is a community	Page 32 of the ISS mentions compensation for the loss of communal resources.	AfDB OS 2
Livelihood Assistance	No provisions	Displaced people are provided with targeted assistance with the aim of ensuring that their standards of living, income-earning capacity, production levels and overall means of livelihood are improved beyond pre-project levels.	AfDB OS 2
Vulnerable People	Many Nigerian policies address the needs of vulnerable people, such as the Gender Policy, Child Act or NEEDS	Special attention needs to be paid to vulnerable groups and special provisions required in the livelihood restoration process.	AfDB OS 2

Category	Nigerian Legislation (Land Use Act)	AfDB OS 2	To be adopted by the RAAMP
	framework. However, there are no specific provisions related to physical or economic displacement.		
Grievances	Section 30 of the Land Use Act 1990 6 v: "Where there arises any dispute as to the amount of compensation calculated in accordance with the provisions of section 29, such dispute shall be referred to the appropriate Land Use and Allocation Committee."	There is a requirement to establish a culturally appropriate and accessible grievance and redress mechanism to resolve, in an impartial and timely manner, any disputes arising from the land-taking process and compensation procedures. PAPs must be informed about the mechanism.	AfDB OS 2
Monitoring	No provisions	An independent third party is required to monitor the implementation of large-scale or complicated resettlement or livelihood restoration plans, with regular feedback from PAPs. For largescale displacement operations quarterly reviews are recommended, and in-depth reviews of 6 months progress, consistent with the overall project scheduling, are critical.	AfDB OS 2

7.3 Compensation Framework

Compensation refers to payment in cash or in kind for loss of land, access to land, and immoveable asset or resources that is acquired or affected by a project.

7.3.1 Compensation Principles

The main compensation principles include the following:

- Provide transparent, fair and timely compensation (prior to land clearance or taking land) for displacement, including compensation for assets in accordance with national regulations and international standards, specifically the AfDB OS2;
- Compensate for lost assets at full replacement value; and
- Restore the livelihoods and welfare of PAPs and local communities such that their well-being is at the least, equal to their pre-resettlement conditions, or that they are better off.

Table 7.2. Categories of PAPs and compensation according to Nigeria guideline and AfDB requirements

S/N	Category of PAPs	Nigeria Law (Land Use Act)	AfDB OS2	What will the RAAMP do
1	Land owners	Cash compensation based upon market value.	Entitled to compensation for land, priority is given to land-to-land compensation and/or compensation-in-kind in lieu of cash compensation. When cash payments are made, the affected people should be provided with counselling to ensure that they have the knowledge to use the compensation wisely. Compensation for other assets at full replacement costs.	This may not be applicable to RAAMP as ownership of the ROW belongs to Government. However, where applicable RAAMP shall adopt the provisions of AfDB OS2
2	Land Tenants	Entitled to compensation based upon the amount of rights they hold upon land	Entitled to resettlement assistance and compensation for all their assets such as crops, structures and other livelihood activities at full replacement cost.	Adopt the provisions of AfDB OS2
3	Land users/Squatters	Not entitled to compensation for land, entitled to compensation for crops	Not entitled to compensation for land but are entitled to resettlement assistance including compensation for loss of livelihood activities, structures, crops etc to improve their former living Standards.	Adopt the provisions of AfDB OS2
4	Owners of "Non-permanent" Buildings	Cash compensation based on market value.	These groups are entitled to resettlement assistance to improve their former living standards (compensation for loss of livelihood activities, structures, crops etc.).	Adopt the provisions of AfDB OS2
5	Owners of "Permanent" buildings	Cash Compensation is based on market value. (that means depreciation is allowed)	Entitled to resettlement assistance and compensation for all their losses at full replacement costs before their actual move.	Adopt the provisions of AfDB OS2
6	Losers of livelihoods	No consideration other than cash values for	Compensation factors in the "total economic cost" including the social, health, environmental and	Adopt the provisions of AfDB OS2

S/N	Category of PAPs	Nigeria Law (Land Use Act)	AfDB OS2	What will the RAAMP do
	(farmers, business people, employees)	assets as described above by asset category	psychological impacts of the project and the displacement, which may disrupt productivity and social cohesion. Considerations are given to the loss of livelihood and earning potential of the affected people. Affected people are provided with targeted resettlement assistance with the aim of ensuring that their standards of living, income-earning capacity, production levels and overall means of livelihood are improved beyond pre-project levels.	
7	Grievance Procedure	No specific requirement for establishing an independent grievance mechanism	Requires the establishment of a culturally appropriate and accessible grievance redress mechanism to resolve, in an impartial and timely manner, any disputes arising from the resettlement process and compensation procedure as early as possible in the resettlement process. The borrower or client is required to work with informally constituted local committees made up of representatives from key stakeholder groups and, in particular, vulnerable communities to establish the grievance and redress mechanism. The grievance redress mechanism, which should be monitored by an independent third party should not impede access to judicial or administrative remedies but must inform affected people about the Bank's Independent Review Mechanism (IRM).	Adopt the provisions of AfDB OS2
8	Rejection of Compensation	No categorical statement	No categorical statement	Put the compensation value in an ESCROW account and continue to negotiate using the GRM to

S/N	Category of PAPs	Nigeria Law (Land Use Act)	AfDB OS2	What will the RAAMP do
				resolve issues before proceeding with take over

7.3.2 Eligibility Principles

PAPs are eligible for compensation entitlements if they are the owners or users of immovable built or planted assets within the Project site footprint. This includes structures (such as fences or sheds), land, crops, trees, and other natural resources. PAPs are eligible for compensation for their assets if they have formal or recognisable rights to these assets.

The typical eligibility criteria for compensation which may be implemented on subprojects is presented in Table 7.3.

Table 7.3: Eligibility Criteria for Compensation

PAP Classification	Eligible for		
	Compensation	No Compensation	Assistance
Those with legal right	Land or asset at replacement cost	For land, assets, and structure on the land after the cut-off date	Assistance needed
Those with temporary or leased rights at cut-off date	Land and assets at replacement cost	For land, assets, and structure on the land after the cut-off date	Assistance needed
Those who use land without any form of right	Assets on land at replacement cost	Assets on land after cut-off date	Assistance needed
Those with no legally recognized right but arrived before cut-off date.	Assets at replacement cost except that compensation may be "topped off" to allow the PAP to acquire a new residence.	Assets on land after cut-off date	Assistance needed
Those who arrived after Cut-off-date	None	None	None
Those with business located within the Community	Assets and lost income as a result of lost business during project duration	For business located in community after the cut-off date and outside the affected area.	Assistance needed

7.3.3 Establishment of Entitlement Cut-off Date

Prior to the commencement of a census survey during the RAP preparation, consultations will be conducted to explain to PAPs that a last day of a census survey (to be carried out during the LRP stage) will constitute **a cut-off date**, after which any individual or a family who moved into the project area but is not listed in the census list of PAPs, will not be entitled to compensation.

To ensure smooth running of the RAP process, each affected community should have a CLO from the community appointed through active consultations with the communities. The CLO shall be the link between the project and the community.

The Cut-off date will be communicated officially to the community in writing as well as in print media and radio advert.

7.3.4 Entitlements

Each project within the RAAMP will have defined range of appropriate compensation entitlements and suggested livelihood restoration measures. Based on the preliminary findings of site visits undertaken within the six states in September 2019, the categories of assets that are likely to be affected are:

- Crops and economic trees.
- Community facilities such as boreholes and hand dug wells.
- Livelihood/Business premises

An example of an entitlement matrix which may be applicable to each of the sub projects is presented the table below:

Table 7.4. Example of an entitlement matrix that could be applied in sub projects

Asset	Impact	PAPs	Nigeria Requirement	Additional compensation or measures in line with AfDB OS2	Livelihoods Support
Land	Permanent/ Temporary land take	Registered owners with title deed for land	<ul style="list-style-type: none"> • Compensation at state rates or support to find replacement land of similar size and quality. 	<ul style="list-style-type: none"> • PAPs are consulted to confirm their compensation preferences (land-for-land or cash). • Compensation at replacement value (in-cash) or where possible, replacement land of the same quality and close to the location of the original land plot. • Livelihood restoration and alternative income earning opportunities e.g. skills training offered. • Support before, during and after taking cultivated land plots to cover a reasonable period of time necessary for PAPs to re-establish their new land plots (which they either were allocated, or 	<ul style="list-style-type: none"> • Livelihood restoration options to affected farmers: continuous crop cultivation on alternative plots, agricultural skills improvement training, or small livestock package • Land Plot Transfer allowance - 10 % of market value payment (as one-off) in cash, to cover all administrative fees related to the purchase or provision of replacement land.
Crops and Economic Trees		Non-registered occupants of land who either cultivate such land based on customary ownership rights	<ul style="list-style-type: none"> • Compensated for lost assets other than land (such as crops and structures) at replacement value. 		

Asset	Impact	PAPs	Nigeria Requirement	Additional compensation or measures in line with AfDB OS2	Livelihoods Support
				bought with the received cash compensation).	
	Loss of crops and productive trees (fruit/nut)	All PAPs regardless of legal status	<ul style="list-style-type: none"> • None (crops are typically harvested prior to displacement) • Compensation for perennial crops at existing compensation rates • Trees are categorised as: saplings, productive, or old. 	<ul style="list-style-type: none"> • Cash compensation at replacement value on the basis of type, age and market price of tree and crops (the compensation amounts to be determined by a certified evaluator during the LRP stage) 	<ul style="list-style-type: none"> • Crops-Training in improved agriculture methods and seeds provided for three seasons (18 months) • Trees-Training in improved agriculture methods and saplings provided for fruit trees and perennial crops
Permanent loss of Structure	Loss of homes / dwellings Tenants	<p>Tenants and original owners of the house and land</p> <p>Physically displaced</p> <p>Economically displaced</p>	<ul style="list-style-type: none"> • Cash compensation for loss of built-up structures at full replacement costs. • Owners of affected structures will be allowed to take and reuse their salvageable materials for rebuilding and 	<ul style="list-style-type: none"> • Housing unit at chosen relocation site; or • Cash compensation at replacement cost value; • Relocation assistance such as transport of belongings within 25 km radius, etc. • One-time cash 	<ul style="list-style-type: none"> • Compensation for loss of livelihood or livelihood development support for economically displaced • Transfer allowance to cover cost of shifting (transport plus loading/unloading)

Asset	Impact	PAPs	Nigeria Requirement	Additional compensation or measures in line with AfDB OS2	Livelihoods Support
	Owners of the structure other than house, whether or not the land on which the structure stands is legally occupied. Tenants	Tenants and original owners of the structure and land	rehabilitation of structure. <ul style="list-style-type: none"> In case of relocation, transfer allowance to cover cost of shift (transport plus loading/unloading) the effect and material will be paid on actual cost basis or on current market rates 	assistance equivalent to 4-month rent moving to alternate premise.	personal effects paid on actual cost basis or on current market rates
Cultural, Religious and community structure facilities	School, church, Mosque, water channels, pathways, and other community structures	All PAPs regardless of their legal status	Complete rehabilitation/ restoration by the project; cash compensation for restoring affected cultural/community structures and installation to the recognize patron/ custodian.	<ul style="list-style-type: none"> Construction of structure as other forms of compensation by the project where possible. 	<ul style="list-style-type: none"> Additional monetary incentives to succour losses

Asset	Impact	PAPs	Nigeria Requirement	Additional compensation or measures in line with AfDB OS2	Livelihoods Support
Special provision for vulnerable PAPs Re-establishing and/or enhancing livelihood	Women headed household, disabled or elderly persons and the landless	Women headed household, disabled or elderly persons	<ul style="list-style-type: none"> Needs based special assistance to be provided either in cash or in kind. 	<ul style="list-style-type: none"> Empowerment training to be carried out alongside cash support. 	<ul style="list-style-type: none"> Support before, during and after training.
Change in livelihood for women and other vulnerable Aps that need to substitute their income because of adverse impact Loss of grazing area	Vulnerable PAPs , particularly women. Owners whose landholding has been reduced to less than 5 acres Cattle Rearers	Vulnerable PAPs particularly women Cattle Rearers	Restoration of livelihood (Vocational training) and subsistence allowance at agreed rate per day for a total of 6 month while enrolled in a vocational training facility Relocation to new grazing area where possible assist the cattle herdsman to locate new grazing field.	Needs based special assistance to be provided as incentives. Consider possible compensation for loss income for the period of locating new grazing area	Support before, during and after training. Same as additional compensation or measures.

Asset	Impact	PAPs	Nigeria Requirement	Additional compensation or measures in line with AfDB OS2	Livelihoods Support

7.3.5 Entitlement Planning

The entitlement planning process entailed two primary tasks:

- Preliminary identify the appropriate cash compensation rates at replacement value to compensate for specific impacts to eligible households, including crop compensation rates; and
- Design of complementary supportive measures to further mitigate the impacts of land-take, including livelihoods restoration initiatives, and vulnerable person assistance measures.

To establish the applicable rates (which will be confirmed and verified by a **certified evaluator** during the RAP stage), an independent valuation expert will be contracted at the RAP stage to advise on the market values of affected land, crops and economic trees in the Project area. The evaluator will be requested to prepare a Valuation Report which will be presented as part of the RAP and included as an Annex in the main report.

7.3.6 Method of Compensation

Individual and household compensation will be made in cash, in kind, and/or through assistance in the knowledge and presence of both man and wife and adult children or other relevant stakeholders where applicable. The type of compensation will be an individual choice although every effort will be made to instil the importance and preference of accepting in-kind compensation especially when the loss amounts to more than 20% of the total loss of productive assets.

It should be noted that when land holdings necessary for the livelihood of affected persons are taken away or reduced in size by project works, the preferred form of compensation is to offer an equivalent parcel of land elsewhere, i.e. "land for land." Where such land is not available, cash payment can be an option even though cash compensation is not the preferred form of compensation in such cases. It should be noted that, under this framework, cash compensation is only appropriate where there is a market for land or other lost assets in the area of the impact. It is unacceptable to offer cash compensation to, say, a farmer, when he/she has no possibility of acquiring new land in the same area.

7.3.7 Entitlement for Compensation

Entitlements for compensation shall be based on the eligibility criteria and the various categories of losses identified in this ESMF and the actual field consultations during the preparation of the RAP. Unless otherwise indicated, payment of compensation and other entitlements and the extension of assistance will be made to PAP households and individual PAPs, as the case may be. In dealing with compensation, preference shall be given to land based resettlement strategies for PAPs whose livelihoods are land-based

Where sufficient land is not available at a reasonable price, non-land based options centered on opportunities for employment or self-re-employment should be provided in addition to cash compensation for land and other assets lost. However, this lack of land shall be documented and justified. Palliative assistance should be avoided, i.e. assistance that is not sustainable such as temporary payments or food donations.

7.3.8 Valuation

Valuation methods for affected land and assets will depend on the type of asset. The following land asset types identified under Nigeria law in this policy framework include:

7.3.8.1 State (urban and non-urban) owned Land

State owned land is usually allocated free by the Governor or Local Government (perhaps except for processing and registration fees). The State Agency will be expected to pay compensation to acquire land in this category in cases where the state-owned land is being used by landlords or squatters, settled upon or otherwise being used. However in this case, the ROW are already in the development plan (Master Plan) for each state.

7.3.8.2 Privately owned Land

Where the need arises for privately owned land, privately owned property, will be acquired at replacement value. The guiding principle is that whoever was using the land to be acquired will be provided other land of equal size and quality or compensation.

7.3.8.3 Assets held under Customary Law

According to Nigeria law, assets held under customary rights are in the Local Government jurisdictions only and will be valued according to the following method and compensation paid for. The project will compensate assets and investments, including buildings, and other improvements, according to the provisions of the resettlement plan. Compensation rates will be replacement cost as determined by surveys of recent transactions of similar assets in the same area as of the date and time that the replacement is to be provided. Under customary law land belongs to chiefdoms, towns and villages. The permanent loss of any such land will be covered by community compensation, which will be in-kind only. A customary land-owner or land user on state owned land will be compensated for land, assets, investments, loss of access etc. at replacement rates at the time of the loss.

7.4 Method of Valuation

In ensuring that during the project implementation, PAPs will be provided full replacement cost of lost structures and other impacted assets and are able to rebuild or replace their structures/assets without difficulties. The valuation will estimate asset compensation rates based on full replacement cost without depreciation. The replacement cost approach is based on the premise that

the costs of replacing productive assets is based on damages caused by project operations.

Relevant data to be captured during valuation will include:

- Location details of the land, boundaries of the area/section of the land to be affected. Affected immovable properties: detailed measurement of buildings, shops, other assets, and structures;
- Property details including noting accommodation, constructional details of affected property external works (fence walls, gates, pavements) affected details etc. were relevant.
- Categorizing temporary structures based on constructional details (wall materials), size of structure and use of structure (business/residential/institutional/agricultural); and, Data on households affected (tenants, owners, relative apprentices/trainees and livelihood).

Valuation shall be based on comparisons to recent comparable transactions/costs and comparable assets or land and not simply on general tables that may be out of date and may be based on non-comparable assets or land.

An indicative table with the Valuation Methods that could be used on sub projects is presented in Table below.

Table 7.5. Indicative Valuation Methods

S/N	Loss of Land	Comparative Method Sales	Based on the open market value of comparable recent land transactions
1	Loss of Buildings, structures and other civil works	Replacement Cost Method or Comparative Sales Method (which ever gives a commensurate value)	Full replacement cost value as if new, recent construction cost rates
2	Loss of Business Income and Loss of Business Good will	Comparative Method	Based on the average monthly net profit
3	Loss of Income from Rent and Expenditure Incurred for Alternative Accommodation during reinstatement period	Comparative Method Sales	Based on the comparable rent passing, rent advance paid
4	Expenditure incurred for Transfer of movable properties and temporary structures	Comparative Method	Based on truck/transport hiring charges

S/N	Loss of Land	Comparative Method Sales	Based on the open market value of comparable recent land transactions
5	Loss of Wages, -Loss of Fees from Apprentice, - Loss of Job Training	Comparative Method	Based on Current Fees and Wages
6	Loss of access to land used for agriculture	Comparative Method	Based on Crop compensation Resettlement assistance: Economic Rehabilitation assistance:

The regular or unpredictable fluctuations of Naira due to inflation, the RAP process shall consider inflation when calculating the rates.

7.5 Arrangements for Compensation

A **Compensation and Relocation Committee** will be set up and be responsible for planning, coordinating and monitoring of compensation and relocation activities. The compensation process for the subproject will involve several steps to be carried out in accordance with the resettlement and compensation plan and the RAP. This will be in accordance with the individual project resettlement and compensation plans as outlined below:

7.5.1 Public Participation

This process seeks the involvement and concerns of the PAPs and the communities in a participatory approach with the project, from the beginning to implementation. Public participation with local communities is an ongoing process throughout resettlement planning and this will have taken off at the screening stage. PAPs will be notified as early as possible and consulted throughout the ESIA and RAP process. The subsequent socio-economic survey will record all relevant information about the PAPs and ensure that this is accurately reflected in the RAP in order to allocate the appropriate compensation. Periodic monitoring will ensure that PAPs have been consulted and that compensation and relocation has been carried out satisfactorily. This will ensure that no affected individual household is simply “notified” one day that they are affected in this way.

7.5.2 Notification

Land users will be notified by the RAAMP that the property they are using is required for development of the subproject. The user will be informed through both a formal notification, both written and verbal, to be delivered in the presence of the community heads and the Coordination Committee. To ensure that any sensitive areas are accurately identified during this procedure,

all necessary community heads, religious leaders, other elders and individuals will accompany the project team to the site.

Prior development of Stakeholders Engagement Plan will help in this stage of the process. The community leaders and PAPs who have already been identified and included in the SEP shall have good understanding of the process thereby making it easy for notification to be disseminated.

7.5.3 Documentation of Holdings and Assets

RAAMP and the local community will arrange meetings with the project affected persons in the presence of the agency of government in charge of land to discuss the compensation process. For each individual or household affected, the project officials complete a compensation dossier containing necessary personal information on, the affected party and those individuals considered as household members, total land holdings, inventory of assets affected, and information for monitoring future arrangements. The dossier shall be confirmed and witnessed by village/community officials and will be kept up-to-date. This is necessary because it ensures monitoring of an individual over time. All claims and assets should be documented in writing.

7.5.4 Agreement on Compensation and Preparation of Contracts

Based on the RAP/ARAP prepared by consultant to RAAMP, the types of compensation shall be clearly explained to the individual or household involved. RAAMP will draw up a contract, listing all property and/or land being surrendered, and the types of compensation (cash and/or in-kind). A person selecting in-kind compensation has an order form, which is signed and witnessed. The compensation contract and the grievance redress mechanisms are to be read aloud in the presence of the affected party and the representative of the local government chairman (or his/her representative), the project officials, and other community leaders prior to signing.

7.5.5 Compensation Payments

All handing over of property such as land and buildings and compensation payments will be made in the presence of the affected party, representative of the state environmental agency and the community officials. Inflation rate shall be considered during valuation and implemented during payment.

7.5.6 Community Compensation Payments

Where applicable, community compensation will be in-kind only for a community as a whole in the form of Corporate Social Responsibilities. Examples of community compensation include; School Building (public or religious), Public Toilets, Well or borehole, Market Place, Taxi Park, Road, Storage warehouse, etc. Community compensation may in itself require land

take and people may be affected, thus a change of impacts which will be compensated.

7.5.7 Procedures for Delivery of Compensation

The procedure for delivery of compensation will be detailed in each RAP. RAAMP will follow approved procedures ensuring that:

- Full payment of compensation is carried out before possession of acquired sites and before works begin.
- RAAMP formally make offers to affected persons and allow persons to accept or reject offer, offer a counter claim and seek redress under the grievance procedures established
- Land/Asset valuation committee communicates the amount to be paid to the acquiring agency and the Ministry of lands will ensure that the amounts are fair and adequate.
- Cheques in the name of the beneficiary or deposits to the beneficiary's bank account shall be the preferred and first mode of payment.
- Payments are made to the affected person personally in the presence of Land/Asset Valuation Committee and an independent witness of the affected person/opinion leader
- Proper receipts are issued and copies given to the affected person, the Finance Department of the State Agency and the Land/Asset Valuation committee;
- Comprehensive reports on payment made are submitted for review by Management of the RAAMP Project Implementation Unit (PIU) and the Land/Asset Valuation committee.

7.6 Monitoring and Evaluation

Monitoring is a crucial element for the success of any resettlement project as it is important to accurately verify the information related to implementation of the Resettlement Plan, and should be planned and costed as early as possible in the project. The monitoring will provide feedback to project management which will help keep the programs on schedule and successful.

7.6.1 Monitoring Process

In order to comply with the AfDB requirements, the overall internal monitoring procedures will include internal performance monitoring, Impact monitoring and final external evaluation.

7.6.2 Livelihood Restoration

The Livelihood Restoration Strategy (LRS) is to prevent and mitigate the potential adverse impacts to the vulnerable PAPs as a direct result of the resettlement process.

7.6.2.1 Key Principles Guiding Livelihood Restoration Planning

The sustainable approach to livelihood restoration is based on the following principles:

- Livelihoods are multi-faceted strategies and a combination of approaches is therefore required to support restoration of income and the reestablishment of community support networks;
- Active participation of intended beneficiaries in planning and decision making to ensure proposed support reflects local realities / priorities and have PAPs active buy-in;
- PAPs should be provided with choices so that they can self-determine how their household will best benefit from the livelihood restoration options;
- Vulnerable households are, by definition, less able to adapt to changes and therefore require targeted support through the planning and implementation of livelihood restoration;
- Transition allowances are necessary, but require clear eligibility and end points;
- Capacity building should be incorporated into livelihood restoration activities to develop PAPs skills, including in agricultural practices. Capacity building acknowledges the different needs of women, men, youth and vulnerable groups with respect to skills development.

7.6.2.2 Process for Determining Livelihood Restoration Options

The livelihood restoration options shall be based on the information gathered from the socio-economic baseline interviews undertaken for the Project. From these activities, the following key subjects may emerge.

- Livelihood options and roles varying for women, men and youth.
- PAP welcome livelihood options and view them as part of their expectations of the Project's development.

Continuous Engagement should continue with PAPs and local communities throughout the project life-cycle, and with traditional leadership and the relevant authorities to discuss the livelihood programmes to make sure that they are meeting the needs of PAPs.

7.6.2.3 Livelihood Restoration Plans

To recognize the potential and magnitude of adverse impacts and develop Livelihood Restoration Plans, the following approach should be considered:

1. LRP for vulnerable PAPs should refer to the ecological conditions, livelihoods and socio-cultural characteristics possessed by PAPs.
2. The LRP should be able to support the PAPs to gain a similar or even better livelihood, independently. It is important that the land acquisition and resettlement process will not cause a dependency to the project which eventually would make more problems in the future.
3. The LRP should be focused on the characteristics of the vulnerability and potential sources of livelihood assets owned by each household, either in the form of Natural Capital, Human Capital, Financial Capital, Social Capital and Physical Capital.
4. Involving representatives of both communities, the project-affected people and host populations, in the consultation process to build familiarity and to resolve disputes that are expected to arise during and after the resettlement process.

7.7 Outline of a Resettlement Action Plan (RAP)

Introduction

The OS 2 requires the borrower or client prepares an Abbreviated Resettlement Action Plan (ARAP) or Full Resettlement Action Plan (FRAP) which is compliant with OS2 and the Bank's Resettlement Policy of 2003 for the following nature of displacement:

- i. any project that involves 200 or more persons (as defined by the involuntary resettlement policy), or
- ii. any project that is likely to have adverse effects on vulnerable groups.

The outline of a typical RAP can be found in Annex A of the Involuntary Resettlement policy and the related IESIA Guidance Note³.

For any project in which the number of people to be displaced is fewer than 200 people and land acquisition and potential displacement and disruption of livelihoods are less significant, the borrower or client prepares an Abbreviated Resettlement Action Plan (ARAP). Annex B of the Involuntary Resettlement policy describes an ARAP, and related guidance can also be found in the relevant IESIA Guidance Note.

As per AfDB guidance, the expected content of each ARAP/RAP of the subprojects within the RAAMP will be as set out in Table 7.6 below.

³ See Annex 13 (Format of a Full/Abbreviated Resettlement Action Plan, A/FRAP) of the AfDB ESAP.
https://www.afdb.org/fileadmin/uploads/afdb/Documents/Publications/SSS_%E2%80%93vol1_%E2%80%93Issue4_-_EN_-_Environmental_and_Social_Assessment_Procedures_ESAP_.pdf

Table 7.6: Outline of a RAP

S/No	Chapter	Description
	Executive Summary	<ul style="list-style-type: none"> Summary of the RAP report
	Introduction	<ul style="list-style-type: none"> Introduce the need for RAP. The RAP should be in line with the AfDB OS 2 and the Bank's resettlement policy of 2003.⁴
1	Description of the Project	<ul style="list-style-type: none"> Define the Project, and its components and the Project Site (s) Determine whether the Project will require land acquisition and relocation of persons Describe the amount of land acquisition and resettlement required Identify options of reducing amount of resettlement Quantify the options of minimizing resettlement
2	Potential Impacts	<ul style="list-style-type: none"> Description of project components that can give rise to resettlement Detailed description of impacts and alternatives considered to minimize resettlement
3	Organizational responsibility	<ul style="list-style-type: none"> Identification of institutions for execution of the RAP Evaluation of capacity and commitment of such institutions to carry out resettlement plan Consideration for strengthening institutions and steps to be taken together with timetable for implementation and budget Involvement of local people and CSOs in planning implementation and monitoring of resettlement
4	Community Participation	<ul style="list-style-type: none"> Detailed description of consultation and participation of displaced and host communities in design and implementation of the resettlement activities. Details of views expressed and how they were taken into account during preparation of resettlement plan A review of resettlement alternatives presented and choices made by displaced person including compensation and resettlement assistance Description of procedure for redress of grievances by project affected people which shall be accessible throughout planning and implementation
5	Integration with Host Community	<ul style="list-style-type: none"> Details of consultations with host communities and local governments and arrangements for prompt tendering of any payments due to host for land and other assets Details of addressing any conflict between resettlers and host community (if any) Details of efforts made to augment public services e.g. water, education, health etc.
6	Socio-Economic Studies/Census	<ul style="list-style-type: none"> Population census covering affected community/individual and their assets. Baseline information on livelihoods and standards of living of the displaced population Inventory of assets of displaced households, extent of physical and economic displacement. Information on disadvantaged groups or persons whom special provisions may have to be made Updated information on displaced person's livelihood and standards of living at regular intervals

⁴ <https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/10000009-EN-BANK-GROUP-INVOLUNTARY-RESETTLEMENT-POLICY.PDF>

S/No	Chapter	Description
		<ul style="list-style-type: none"> • Description of land tenure system in place, lot sizes and any cultural heritages/values that may be restricted by the project • Description of type and size of infrastructure and other services that may be impacted • Summarize impacts of the project for each categories of affected groups • Social and cultural characteristics of displace communities
7	Legal/Institutional Framework, including mechanisms for conflict resolution and appeal	<ul style="list-style-type: none"> • Details of local agencies responsible for resettlement • Details of applicable legal and administrative procedures including a description of the remedies available to displaced persons in the judicial process • Details of laws and regulations relating to agencies responsible for implementing resettlement activities. • Details of legal steps necessary to ensure the effective implementation of resettlement activities
8	Institutional framework	<ul style="list-style-type: none"> • Details of agencies responsible for resettlement activities and NGOs that may have role in project • Details of institutional capacity of agencies and CSOs
9	Eligibility and Entitlements	<ul style="list-style-type: none"> • Definition of displaced persons and criteria for determining eligibility for compensation and other resettlement assistance. • Details of cut-off date
10	Valuation of, and compensation for losses	<ul style="list-style-type: none"> • Appoint Registered/District Valuer for compensation purposes • Carry out consultation with affected persons • Identify and inspect affected assets for valuation • Process Valuation Report and prepare Compensation Schedule • Determine whether additional income assistance is necessary • Details of methodology used for valuation
11	Identification and selection of resettlement site, site preparation and relocation.	<ul style="list-style-type: none"> • Determine need for relocation and discuss with affected person • Select site for relocation and make arrangement for land titling in favour of resettlers • In consultation with respective District Settlement Planning Department, prepare Resettlement Plan • Discuss outsourced services if any and draw up cost implications • Ensure Plan comply with environmental consideration • Evaluate the impact of the Plan on host community • Determine any special assistance measures necessary to vulnerable groups • Identify risks associated with the Plan and chart out ways of overcoming them • Provide information on updating of the Plan • Details of legal arrangements for regularizing tenure and transferring titles to resettlers
12	Shelter, Infrastructure and social services	<ul style="list-style-type: none"> • Details of social development services planned to be implemented for host communities
13	Environmental protection	<ul style="list-style-type: none"> • Details of environmental impacts of proposed resettlement and mitigation measures
14	Implementation schedules	<ul style="list-style-type: none"> • Details of implementation schedule for resettlement from preparation to final implementation including target dates for achievement of expected benefits to resettlers

S/No	Chapter	Description
15	Costs and Budget	<ul style="list-style-type: none"> • Prepare a financial plan with emphasis on responsibilities and accountability • List sources of funds • Identify components of the sub-project that may require additional external funding • Discuss provisions for handling price fluctuations, contingencies and excess expenditure • Prepare a template for Project Cost Estimate/budget
16	Monitoring and Evaluation	<ul style="list-style-type: none"> • Discuss measures for external and internal monitoring • Define monitoring indicators • Determine mode and frequency of reporting and content of internal monitoring • Discuss feedback mechanism
	Annex	<ul style="list-style-type: none"> • Compensation Valuation Rate for Project based on their location • Checklist of Resettlement Screening • Affected Plot sheet • Affected Building Sheet • Affected Household Sheet • Sample of Grievance Log • List of Stakeholders Consulted

CHAPTER EIGHT: STAKEHOLDER ENGAGEMENT AND GRIEVANCE MANAGEMENT

8.1 Stakeholders' Consultation and Engagement

The AfDB recognize the importance of open and transparent engagement between clients, workers, local communities directly affected by projects and, where appropriate, other stakeholders as an essential element of Good International Practice and corporate citizenship. Such engagement is also a way of improving the E&S sustainability of projects. In particular, effective community engagement, appropriate to the nature and scale of the project, promotes sound and sustainable E&S performance and can lead to improved financial, social and environmental outcomes, together with enhanced community benefits.

Stakeholder engagement is central to building strong, constructive and responsive relationships which are essential for the successful management of a project's E&S impacts and issues.

In RAAMP implementation, consultation shall be tailored to the language preferences of the affected communities, their decision-making process, and the needs of disadvantaged or vulnerable individuals or groups. The emphasis will be whether the affected communities are "in support of the project" and not about whether there is a lack of opposition to a project. Consultation will be expected to provide opportunities for affected communities to express their views on project risks, impacts and mitigation and management measures, and shall allow the borrower or client to consider and respond to them in ways that facilitate the realization of community support.

As part of the realization of the sub-projects under the program, RAAMP will engage mechanisms to ensure *Free, Prior and Informed Consultation (FPIC)* has been conducted, and *Informed Consultation* has been enabled throughout the project cycle. FPIC and Informed Consultation shall be assessed through a number of factors and indicators including:

- i. RAAMP's strategy and principles of community engagement
- ii. stakeholders' identification and analysis
- iii. mechanism of community engagement
- iv. consultation FPIC

- v. information disclosure
- vi. informed participation
- vii. vulnerable groups consultation and mitigation
- viii. grievance mechanism-structure, procedure, and application
- ix. feedback to the affected parties

Consultation will be considered an ongoing process, not just as a step in the procedures for obtaining project approval. It shall begin at the project identification stage, or at least at an early stage during project preparation, and shall continue throughout the life of the project through to construction, operation and decommissioning. As the Bank recognizes local requirements in addressing E & S considerations, stakeholders' consultation and engagement will also incorporate the requirements of consultations when undertaking the ESA studies as prescribed by Nigerian environmental legislation such as the EIA Act Cap E12 LFN of 2004.

The results of the consultation should be adequately reflected in the project design and in the project documentation. The affected communities are given the opportunity to participate in key stages of project design and implementation. Consultations will be conducted with the objective of ensuring that the project has broad community support and that affected people endorse the proposed mitigation and management measures. When the borrower or client has identified vulnerable communities that would potentially be affected by the project, the borrower/client engages in meaningful informed consultation and participation with the vulnerable communities, beginning as early as possible in the project cycle before the project is submitted for approving the project for financing.

The client, the AfDB will make available to the public the ESIA documents. The procedures require the public disclosure of summaries in accordance with specified deadlines. The disclosure requirements for AfDB, which must be met by the sub-projects are presented in Section 2.9.

8.2 Consultations Related to Involuntary Displacement

A Resettlement Action Plan (RAP) should be prepared under a development approach that addresses the livelihoods and living standards of displaced persons, as well as compensation for loss of assets, using a participatory approach at all stages of project design and implementation. As highlighted before, the sub projects within RAAMP are expected to have significant

displacement and thus RAP is anticipated to be used to address issues of involuntary displacement.

Displaced persons and host communities should be meaningfully consulted early in the planning process and encouraged to participate in the planning and implementation of resettlement programs. The displaced persons should be informed about their options and rights pertaining to resettlement. They should be given genuine choices among technically and economically feasible resettlement alternatives. In this regard, particular attention should be paid to the location and scheduling of activities. In order for consultation to be meaningful, information about the proposed project and the plans regarding resettlement and rehabilitation must be made available to local people and national civil society organizations in a timely manner and in a form and manner that is appropriate and understandable to local people. As well, careful attention should be given to the organization of meetings. The feasibility of holding separate women's meetings and fair representation of female heads of households, in addition to mixed meetings, should be explored. Also, the way in which information is disseminated should be cautiously planned as levels of literacy and networking may differ along gender lines.

Particular attention should be paid to the needs of disadvantaged groups among those displaced, especially those below the poverty line, the landless, the elderly, women and children, and ethnic, religious and linguistic minorities; including those without legal title to assets, female-headed households. Appropriate assistance must be provided to help these disadvantaged groups cope with the dislocation and to improve their status. Provision of health care services, particularly for pregnant women and infants, may be important during and after relocation to prevent increases in morbidity and mortality due to malnutrition, the psychological stress of being uprooted, and the increased risk of disease.

AfDB will support RAAMP's efforts on sub-projects involving involuntary resettlement through assistance to the executing agencies to adopt and operationalize objectives and principles of this policy;

AfDB will also support the capacity building, as required of executing agencies to plan and implement involuntary resettlement in all projects and provide technical assistance to strengthen the organizational, managerial and

implementation capacity of agencies responsible for resettlement including strengthening the environmental, social, economic and technical expertise of these agencies.

8.3 Program Grievance Redress Mechanism (GRM)

The Program will adopt the AfDB's approach to resolving grievances on project interventions. This is described in Table 8.1 below:

Table 8.1. AfDB Grievance Redress Mechanism Approach

The AfDB defines project GRM as a systematic process for receiving, evaluating and facilitating resolution of affected people's project-related concerns, complaints and grievances about the borrower's/client's social and environmental performance on a project. AfDB requires its clients to be aware of and respond to stakeholders' concerns related to the project in a timely manner. For this purpose, the client will establish an effective grievance mechanism, process, or procedure to receive and facilitate resolution of stakeholders' concerns and grievances, in particular, about the client's E&S performance.

In OS 1, the Bank requires the borrower/client to establish a "credible, independent and empowered local grievance and redress mechanism to receive, facilitate and follow up on the resolution of the affected people's grievances and concerns regarding the E&S performance of the project. The local grievance mechanism needs to be sufficiently independent, empowered and accessible to the stakeholders at all times during project cycle and all responses to grievances shall be recorded and included in project supervision formats and reports."

Some Bank operations may inevitably have the potential to impact the local population's well-being. The aim of a project GRM is, therefore, to enable people fearing or suffering adverse impacts to be able to be heard and assisted. People potentially or actually affected by a Bank-funded project need a trusted way to voice and resolve project related concerns and the project needs an effective way to address affected people's concerns. The GRM provides a structured and managed way of allowing the concerns of affected people to be heard and addressed, including by the borrower's/client's project management staff and in certain circumstances, by Bank staff.

The main advantages of establishing and maintaining an appropriate GRM linked to a Bank-funded project are:

- Helping maintain good development conditions in the field, conducive to harmonious, sustainable development.*
- Minimising the risk of violent or otherwise destructive behaviors, and the associated economic and social costs.*
- Helping to protect the most vulnerable local groups and individuals.*
- Alleviating the risk of dispute or conflict escalation, such as cases being brought to the Bank's Independent Review Mechanism.*

The process by which the GRM is designed should be integrated into the overall approach to project preparation as prescribed in the Bank's ISS. The Bank ISS through its (IESIA) Guidelines

Notes provides guidance on development and Implementation of GRM. It should also be included in the concrete actions required in the ESMP for Category 1 projects and on a case by case basis, for Category 2 projects that exhibit specific potential social tensions, in particular risks of mismanagement of compensation/resettlement schemes or the presence of particularly vulnerable groups in the project's area of influence.

a. Independent Review Mechanism (IRM)

AfDB has also established its own accountability mechanism, the Independent Review Mechanism (IRM). The IRM seeks to assess whether a Bank approved project complies with relevant the AfDB's ISS. The IRM makes itself accessible to any group (a minimum of 2 persons living in the project's area of influence) actually or potentially negatively affected by a Bank-funded project. The IRM reports to the Bank's Board of Directors and is thus independent of Bank management. So far, the IRM has received approximately six requests for intervention. Based on the World Bank's Inspection Panel experience, dating back to 1993, which has processed 80 requests since then, the IRM is likely to intensify its activities during the coming years.

The IRM has been set up by the Bank to achieve more transparency. It is also a costly mechanism to trigger. The establishment of local GRMs can help to alleviate the need for plaintiffs to resort to the IRM, while problem-solving can be more rapidly and cost-effectively done locally. The cultural context in which GRMs operate also helps to defuse complaints and to find appropriate and commensurate solutions.

b. GRM at project level

The GRM in the Program will be established under the guidance provided in the Bank's ISS through its IESIA Guidelines Notes. The first step is to determine the primary goal of the GRM which would generally be to resolve specific grievances in a manner that meets both project management and community needs, but with important local variations. The scope of the grievances that may legitimately be brought forward by the communities and/or individuals affected shall be defined in advance. That scope will generally cover most, if not all, of the issues raised in a typical E&S Assessment: natural resources, pollution, cultural property, land acquisition, the income of resettled/displaced populations, the welfare of vulnerable groups, etc.

The second step is to design the GRM by:

1. Preparing a preliminary design.
2. Selecting ways and means to receive, register, assess and respond to grievances.
3. Select grievance resolution approaches.
4. Design a means to track and monitor grievances.
5. Develop the grievance mechanism infrastructure.
6. Review and refine the design.

At sub project level, with in the RAAMP, the design of GRM may be done with the assistance of the specialized Independent consulting team as part of the ESIA or associated studies and assessments. The GRM shall be designed based on the following principles:

- Involvement of individuals of mixed levels and functions from the entity (e.g., operations, environmental affairs, community relations, legal affairs, contractors). Staffing the design team from just one function such as community relations or human resources is unwise.

- *The inclusion of a balanced group of representatives from the community, representing the range of constituencies and demographics that will be using the grievance mechanism, while keeping the team small enough to be responsive.*
- *GRM Relying upon clear terms of reference and a work plan that outlines team goals, roles, and responsibilities, level of decision-making authority, reporting lines, tasks, time frame, and products.*
- *Making the use of multiple channels (e.g., face to face, phone conversation, mail, text or e-mail, message on a dedicated website), sensitive to cultural customs and traditional methods that may influence or impede the expression of grievances.*
- *The existence of a central point of contact that will receive complaints and log them into a central register.*
- *Existence and operation of designated complaint resolution staff.*
- *Processes for acknowledging the receipt of a grievance and informing the complainant about the time frame in which a response can be expected.*

8.4 Appointing members of Grievance Redress Committees (GRC)

The Program will involve the formulation of a Grievance Redress Committee (GRC) at project level, i.e. GRM staff, for handling grievances. Generally, all project staff, the management staff of agencies involved in the project, and government administrators will take on grievance handling as a responsibility. The GRC members should be qualified, experienced, and competent personnel who can win respect and confidence of the affected communities. It is also important to maintain a gender balance within the GRMs. Criteria for selecting members of GRCs could include the following:

- Knowledge of the project, its objectives, and outcomes
- Technical knowledge and expertise to understand project design and requirements;
- Understanding of the social, economic, and cultural environments and the dynamics of the communities;
- Capacity to absorb the issues dealt with and to contribute actively to decision-making processes;
- Social recognition and standing; and
- equitable representation of males and females.

The GRC at project level shall constitute among other members, an officer from the Local Government Authority, Village or Community Heads, Project Coordinator, a member from a recognized Non-Government Organization and a community representative. The GRC shall have the right to request the project technical staff, and officers from relevant state or non-state institutions to attend the meetings and provide information. A complainant has the right to appear in person, to be accompanied by a community member, and/or to

request to be represented by a community elder. GRCs shall be established at the project level to assure accessibility for Project Affected Persons.

8.5 Procedures, complaints channels and time frame for Grievance Redress Mechanisms

As there is no ideal model or one-size-fits-all approach to grievance resolution, the best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs, and project conditions and scale. The process by which a complaint will be accepted or rejected needs shall be carefully designed and shall maximize interactivity and cultural sensitivity. The acceptance/rejection of a complaint will go through a discussion stage where the plaintiff and the GRM staff interact on the grounds and motives of the complaint, after which the plaintiff should clearly and transparently be told whether or not the complaint is eligible and will be processed. The acceptance/rejection of the complaint shall be based on objective criteria that are posted by the GRC, including a written copy displayed in the public access area of the GRM in an appropriate language.

The processing of the complaint, if accepted should go through various phases:

- Filing of the complaint and labeling with an identification code communicated immediately to the plaintiff.
- Assessment of the complaint (including severity of the risk/impact).
- Formulation of the response.

Selection of the grievance resolution approach is a key. There are four general approaches to choose from:

- The project's management proposes a solution.
- The community and the project's management decide together.
- The project's management and the community defer to a third party to decide.
- The project's management and the community utilize traditional or customary practices to reach a solution.

AfDB's ISS recommends the application of a “**Decide together**” approach that is usually the most accessible, natural and unthreatening ways for communities and a project's management to resolve differences. With the potential to resolve perhaps the majority of all grievances, “decide together” should be

the center-piece of any grievance mechanism's resolution options. In its simplest form, a grievance mechanism can be broken down into the following primary components:

1. Receive and register a complaint.
2. Screen and validate the complaint (based on the nature and type of a complaint).
3. Formulate a response.
4. Select a resolution approach, based on consultation with affected person/group.
5. Implement the approach.
6. Settle the issues.
7. Track and evaluate results.
8. Learn from the experience and communicate back to all parties involved.

The time for the Grievance Redress Committees to be held shall be agreed and documented, depending on the nature and severity of the complaint.

A number of mechanisms will be available to aggrieved parties to access redress. These shall include institutions specific (**internal**) to a project and set up from its inception or others that might have emerged over time in response to needs identified while the project evolved. Other institutions which are already established within a country's judicial, administrative, and/or political systems and exist outside a project shall also be used. These include the government bureaucracy; judicial institutions; and political institutions such as Local Government Authorities, etc.

In addition, the Bank itself sometimes shall provide a forum for grievance redress. GRMs shall include avenues for resolving conflicts between Affected Persons or other stakeholders and can provide information sought by the public on the project.

The channels of presenting complaints could include the presentation of complaints via third parties (e.g., village elites/traditional leaders, community-based organizations, lawyers, non-government organizations [NGOs], etc.); face-to-face meetings; facsimile, telephone, and email communications; written complaints; etc.

The projects to be implemented under the Program are mainly in the Northern and Southern parts of Nigeria with diverse E&S contexts. It is therefore expected that as part of the implementation of these projects, the projects shall develop GRM which will bring simpler means of addressing complaints. If the complainant is not satisfied, the complainer will have to appeal to the Project Manager of the AfDB PIU. The projects shall also develop robust SEP which will bring together all stakeholders. These shall be prepared and included in the scoping report.

8.6 Stakeholder Engagement Activities during the preparation of the ESMF

8.6.1 Stakeholders Consulted

As part of the preparation of the ESMF, stakeholder engagement activities were undertaken with a number of stakeholders at Federal, Regional and local level across the States involved in the RAAMP intervention. This is in addition to detailed site walkover to the potential project sites to engage with PAPs/PACs throughout the field visits.

A summary of the stakeholders consulted is provided in Table 8.2 while minutes of proceedings at the consultation meetings for each state is provided on tables 8.4-8.9.

Table 8.2: Categories of stakeholders consulted during the preparation of the ESMF

	Stakeholder	Mandate	Objective of Consultation	Highlight of Consultation	Dates Consultation Undertaken
	Government Agencies				
1	Federal Project Management Office RAAMP	Coordinate RAAMP on behalf of Federal Ministry of Agriculture and Rural Development	Identify key project development and issues relating to implementation and management as well as capacity for E& S Management	Identification of Environmental and Social issues associated with RAAMP as well as capacities to be put in place as supports for SPIU	<ul style="list-style-type: none"> Tuesday September 3, 2019
2	State Project Management Units for Anambra, Benue, Borno, Cross River, Gombe and Taraba State	Implement RAAMP in their states	Understanding of project components to enable the identification of potential E&S impacts	Highlight of project description and brainstorming on potential E&S Impacts as well as from engineering perspective	<ul style="list-style-type: none"> 4th – 26th September, 2019:
3	Project Affected Communities and Persons across the state		Understanding of project components to enable the identification of potential E&S impacts	Project awareness and eliciting information on how the project will affect them.	<ul style="list-style-type: none"> 4th – 26th September, 2019:
4	Other Relevant MDAs	Support project implementation	Elicit information that can help in identifying potential E&S Issues associated with RAAMP implementation	Project awareness and eliciting information on potential E&S issues that can emanate from RAAMP	<ul style="list-style-type: none"> 4th – 26th September, 2019:

Table 8.3: Stakeholders consulted in each state during the preparation of the ESMF

State	Date of Consultation	Stakeholders Consulted
Benue State	September 5, 2019	SPIU, Min of Agric, Environment, Water Resources, Women Affairs, Farmer's Association and PAPs
Taraba State	September 6, 2019	SPIU, Min of Agric, Environment, Water Resources, Women Affairs, Land Development, Farmer's Association and PAPs
Cross River State	September 10, 2019	SPIU, Min of Agric, Environment, Farmer's Association and PAPs
Anambra State	September 11, 2019	SPIU, Min of Agric, Environment, Works, Water Resources, Women Affairs, Farmer's Association and PAPs
Borno State	September 13, 2019	SPIU, Min of Agric, Farmer's Association and PAPs
Gombe State	September 26, 2019	SPIU RAAMP Gombe State

Table 8.4: Summary of Stakeholders Consultation in Anambra State

ITEM	DESCRIPTION
Venue of Meeting	Conference Hall, RAAMP Office, Ministry of Works Headquarters, Anambra State
Date of Meeting	11 September, 2019
Language	English
Participation	<ol style="list-style-type: none"> 1. SPIU 2. Commissioner for Works 3. Permanent Secretary (PS), Ministry of Works 4. Representatives of MDAs including Ministries of Agriculture, Environment, Lands, etc. 5. Representatives of Farmers Association and Cooperatives 6. President Generals of Benefitting Communities 7. ESMF Consultant and his Team <p>Full attendance is attached as Appendix 2.</p>
Introduction and Remarks	<p>The SPC welcomed participants and introduced members of the SPIU and the Consultant to the participants. Thereafter the participants took turn to introduce themselves. The SPC informed the participants that Anambra State government is working with the African Development Bank (AfDB) to open up rural roads in order to provide access to farmers and rural people for easy movement of produce to markets. He enumerated the steps taken by the state government so far including the setting up of the SPIU, provision of counterpart funding, prioritization of roads and intervention areas in 18 LGAs as well as sensitization of traditional rulers, farmers, women and youths in all affected LGAs. He emphasized that the SPIU has met all the requirements of AfDB so far and the next stage is the engagement of E&S Consultants for safeguard instruments (ESIA, ESMP and RAP).</p> <p>The Consultant informed participants about the objectives of ESMF and the integrated safeguard systems of AfDB. He reiterated the importance of taking cognisance of E&S issues to ensure adverse E&S impacts on the environment and the rural people who are beneficiaries are avoided or reduced to acceptable levels. He further appreciated the participation of a wide range of stakeholders and encouraged them to freely expressed their enthusiasm, perception and concerns especially peculiar E&S issues as concerned civil works and rural settings in Anambra State so that such issues will be captured in the ESMF and mainstreamed into subsequent ESIA/RAP to ensure project sustainability.</p>
Information, Concerns and Questions from Stakeholders	<p>The stakeholders took turn to express overwhelming joy about the RAAMP as the existing condition of most rural roads in the state have been making life difficult for farmers and rural dwellers. They observed that the approach by the AfDB to ensure E&S issues are adequately addressed before construction as a development that will ensure project benefits are maximised and negative impacts drastically reduced. The key information provided, and concerns expressed by stakeholders are presented below:</p> <ol style="list-style-type: none"> 1. The representative of the Ministry of Agric informed participants that due to the difficulty being experienced due to bad road, some of the major commercial farmers are relocating their farms from the state. He enumerated some of the major impacts resulting from lack of good access roads to include post-harvest loses and high cost of transportation. 2. He recommended that the SPIU should ensure that all roads to be constructed under RAAMP include drainages which are properly channelled to empty flood water into down river. He shared experience of similar rural roads with improperly channelled drainage system emptying flood water into farmlands resulting in flooding and destruction of crops and assets of farmers. He advised the SPIU to ensure adequate consideration of the nature of soil across the state particularly

	<p>at Orumba North, Orumba South and Aguata LGAs where the soils are loose and sandy loam and can be easily washed away by erosion.</p> <ol style="list-style-type: none"> 3. He also advised the SPIU to ensure contractors are adequately mobilised and paid as at when due to ensure all projects initiated are completed promptly as there are many abandoned road projects in the state. He remarked that once road projects are not completed, the investment will go to waste, culverts and bridges will deteriorate and the condition of the road may worsen. 4. The representative of the Ministry of Environment also reiterated the danger of abrupt termination of drainages to include erosion and flooding of communities and farmlands. 5. He also advised the SPIU to provide adequate monitoring of contractors to ensure no borrow pit is improperly abandoned to prevent environmental degradation and risk to community health and safety. 6. He also advocated for considerations of climate change by avoiding indiscriminate felling of trees. He advised that every tree removed should be replanted to ensure carbon sequestration. 7. The President General of Uguese Community highlighted the plight of farmers in his community due to the bad nature of road network. He remarked that most of the produce perished during the past few months of the raining season and farmers lost most of their investment. He commends the AfDB for the initiative of RAAMP which will ensure such loss will not be experienced again. 8. He assured of community support for the projects but emphasised that all affected assets and economic trees should be adequately compensated as they are the major source of livelihood of the rural people. 9. A community leader from Ndiowu town believed that construction activities will bring direct employment to youths and labour influx will also lead to boost in economic activities. He however emphasised that rape, sexual exploitative behaviours and abuse will not be tolerated. He appealed to the SPIU to ensure local youths are engaged for construction activities. 10. Stakeholders also overwhelmingly advised that roads under RAAMP should be sealed to ensure sustainability. They believe that similar projects under FADAMA failed because the roads were not sealed and adequate drainages not provided. 11. Other recommendations from stakeholder include <ul style="list-style-type: none"> - sensitisation and continuous engagement of rural populations particularly the youths to prevent restiveness. - Development of grievance redress mechanism to promptly and proactively manage grievance. - The community leaders were advised to set up committee to act as liaison between the SPIU/ Contractors and the community. - SPIU to ensure contractors are duly introduced to host communities prior to commencement of construction. - Engagement of youths for construction activities to limit influx of foreign workers and to boost economic prosperity of rural communities. - Compensation for assets and economic trees.
<p>Consultation with Farmers along Ndiowu – Anukpo – Ihueze Spur to Ndikilonwo Road</p>	<p>The road which is about 7.5km was observed to have failed and impassable by vehicles due to erosion menace including deep gullies observed along the road. Currently, most of the farmers in the areas have abandoned their farms as there is no access. The road traverses farming communities and major rice plantations which the people believe can sustain the entire state if an improved access is provided.</p> <p>The farmers consulted expressed delight about the RAAMP and promised adequate cooperation for the SPIU and the contractors. They are willing to allow some of their economic trees be removed, if need be, even without compensation to show their desperation for a good road. They stated that the previous initiative of AfDB in the area (Agricultural Transformation Agenda Support Program [ATASP-1]) is failing due to</p>

	the nature of the road. The farmers also advocated for provision of irrigation facilities to increase yields and productivity. The rice farmers remarked that the crop can be planted 3 times a year with irrigation as a rice cycle is about 3 months.
Reactions from SPIU and Consultant	All concerns and issues raised were adequately addressed by the SPIU with support from the Consultant and stakeholders who provided expert supports in key areas. All recommendations from stakeholders were noted and documented.
Remark by Honourable Commissioner, Ministry of Works	The Commissioner for Works emphasized the importance of taking cognisance of E&S issues before a project takes off and promised that he will ensure all issues raised by stakeholders are addressed. He also assured that all E&S assessment studies including ESIA/ESMP and RAP as well as robust community engagement will be undertaken before construction.
Closing Remarks	The SPC thanked participants for freely expressing their concerns and for raising salient issues to ensure successful implementation of RAAMP in Anambra State. He promised continuous engagement with all stakeholders throughout RAAMP implementation and assured that all issues raised have been noted and will be addressed.

Table 8.5: Summary of Stakeholders Consultation in Benue State

ITEM	DESCRIPTION
Venue of Meeting	Conference Hall, Ministry of Agriculture, Benue State
Date of Meeting	5 September, 2019
Language	English
Participation	<ol style="list-style-type: none"> 1. SPIU 2. Permanent Secretary (PS), Ministry of Agriculture 3. Chairman, House Committee on Agriculture, Benue State House of Assembly. 4. Representatives of MDAs including Ministries of Agriculture, Women Affairs, Lands, Communication, Rural Development etc. 5. Representatives of All Farmers Association of Nigeria (AFAN), Benue State. 6. Civil Society Organisations 7. Religion Organisations 8. ESMF Consultant and his Team <p>Full attendance is attached as Appendix 2</p>
Introduction and Remarks	<p>The SPC welcomed participants and introduced members of the SPIU and the Consultant to the participants. Thereafter the participants took turn to introduce themselves. The PS informed the participants that Benue State government is working with the African Development Bank (AfDB) to open up rural roads in order to provide access to farmers and rural people for easy movement of produce to markets. She expressed delight that the State is making progress towards the implementation of the project with proactive steps taken so far including the setting up of the SPIU, provision of 1.5 Billion counterpart funding, initiation and attendance of several meetings with the National Project Management Unit and the AfDB, engagement of E&S Consultants for safeguard instruments (ESIA, ESMP and RAP).</p> <p>The Consultant informed participants about the objectives of ESMF and the integrated safeguard systems of AfDB. He reiterated the importance of taking cognisance of E&S issues to ensure adverse E&S impacts on the environment and the rural people who are beneficiaries are avoided or reduced to acceptable levels. He further appreciated the participation of a wide range of stakeholders and encouraged them to freely expressed their enthusiasm, perception and concerns especially peculiar E&S issues as concerned civil works and rural settings in Benue State so that such issues will be captured in the ESMF and mainstreamed into subsequent ESIA/RAP to ensure project sustainability.</p>

<p>Information, Concerns and Questions from Stakeholders</p>	<p>The stakeholders expressed delight that RAAMP is being implemented in Benue State and lauded the initiative of AfDB to ensure E&S issues are adequately addressed in the process. The key information provided, and concerns expressed by stakeholders are presented below:</p> <ol style="list-style-type: none"> 1. The representative of CSO encouraged the SPIU to ensure involvement of all stakeholders and ensure engagement of local labour during construction. He also sought to know the project descriptions – type of roads, surfacing and drainages. 2. Representatives of Min. of Women Affairs advocated for the involvement of in all aspects of the project including construction. 3. Rep of Ministry of Lands advised the SPIU to ensure adequate soil testing is carried out before construction to ensure appropriate construction techniques are used to guarantee sustainability. 4. The ESIA/RAP consultant provided update on his work as field work is currently ongoing. He also expressed a concern that road design ought to have been done before E&S assessment and not the other way around as it is currently been done. 5. Representative of the Engineering firm engaged for prioritization of roads and intervention areas, briefed on the method used for his studies and emphasized it was devoid of political influence but based on connectivity, major produce and value addition, processing centres, government interventions (silos, fertilizer plants etc.) and other key considerations. He recommended that the road should be sealed immediately after construction as delay may allow erosion to destroy the surface. 6. He also reiterated the prevalence of HIV/AIDS in Benue state and expressed concerns regarding how labour influx can exacerbate the menace in rural areas. 7. Another representative of Min of Lands suggested that workers should be screened for STDs before engagement by contractors as a means of safeguarding the rural population. He also expressed sadness about the proliferation of abandoned borrow pits which is endangering the health and safety of rural dwellers. Other concerns include exploitation or rural farmers (inadequate compensation which is impoverishing the rural people). 8. Representative of the religion sector advocated for considerations of climate change. He maintained that every tree cut should be replanted to ensure carbon sequestration. 9. A representative of the Planning Commission sought to know what kind of investment the State is getting from the AfDB (loan, grant etc.). She also encouraged the SPIU to investigate why roads are easily damaged in Benue state and mainstream findings into the new roads under RAAMP. 10. Representative of Min. of Rural Development suggested that road should be sealed and laterite used to protect the roads from erosion. 11. Representative of AFAN, appealed that compensation should be paid to farmers for affected assets and economic trees. 12. Representative of Min. of Information advised the SPIU to ensure rural people are carried along from the beginning and all through the process to ensure they participate and take ownership of the project as this will enhance sustainability. 13. Rep of Bureau of Local Government Affairs advised the SPIU to carry the LGAs along as they can provide specific information and help coordinate engagement with rural people within their jurisdiction. 14. A stakeholder suggested that if the SPIU provides timely information to farmers regarding construction, they can harvest their perennials crops and halt planting new ones along the RoW such that the cost of compensation will be drastically reduced.
--	--

Reactions from SPIU and Consultant	All concerns and issues raised were adequately addressed by the SPIU with support from the Consultant and stakeholders who provided expert supports in key areas. The ESMF Consultant also took time to encourage the ESIA/RAP consultant to note all observations from stakeholders and mainstream them into his studies. He was also reminded to adhere strictly to the AfDB Integrated Safeguard System (ISS) and review the ESMF being prepared to enrich his report. All recommendations from stakeholders were noted and documented.
Closing Remarks	The House Committee Chairman on Agriculture thanked participants for freely expressing their concerns and for raising salient issues regarding RAAMP in Benue State. He promised continuous engagement with all stakeholders throughout RAAMP implementation. He further assured due diligent and adequate oversight supervision of the SPIU and contractors to ensure RAAMP is well implemented and all projects are sustainable, and the people of the state reap the full benefits.

Table 8.6: Summary of Stakeholders Consultation in Borno State

ITEM	DESCRIPTION
Mode of Consultation	Telephone Conversation and Email
Date of Meeting	13 September, 2019
Language	English
Participation	<ol style="list-style-type: none"> 1. SPC 2. Tujjani A. Ladan (ESO) - 08037535876 3. Francis Bala (SSO) – 07039720484 4. ESMF Consultant and his Team
Introduction and Remarks	<p>The SPC welcomed the Consultant and his team and introduced members of the SPIU. Thereafter the Consultant introduced his team.</p> <p>The Consultant informed the SPIU about the objectives of ESMF and the integrated safeguard systems of AfDB. He reiterated the importance of taking cognisance of E&S issues to ensure adverse E&S impacts on the environment and the rural people who are beneficiaries are avoided or reduced to acceptable levels. He encouraged the SPIU to provide information and express their perception and concerns especially peculiar E&S issues as concerned civil works and rural settings in Borno State so that such issues will be captured in the ESMF and mainstreamed into subsequent ESIA/RAP to ensure project sustainability.</p>
Information, Concerns and Questions from SPIU	<ul style="list-style-type: none"> • The SPC informed the Consultant that prioritization of 516km of roads and intervention areas across 11 LGAs of the state have been completed. • In addition, the state was divided into 5 Agro-Logistic Areas (ALA) with a total of 7 Agro-logistic Hubs to be constructed in the following selected LGAs: Konduga, Dikwa, Kwaya Kusar, Askira Uba, Gubio, Monguno and Kaga. • E&S Consultants for safeguard instruments, specifically ESIA/ESMP and RAP have been engaged. So far field studies have been concluded and the SPIU is awaiting a draft Report. • No form of E&S training or capacity building programme has been undertaken by the Environmental and Social safeguard Officers. • The SPC informed the Consultant that road constructions will be carried out on both new and existing roads. • Particularly for roads through new routes, removal of trees (including economic trees) and Passage through existing farms are being envisaged. • The State RAAMP SPIU is considering Land conservation measures through afforestation, specifically by planting trees at both sides of the roads at appropriate spacing to control erosion and also combat climate change.

Reactions Consultant	The consultant advised the SPIU to ensure their E&S Consultant adhere strictly to the AfDB Integrated Safeguard System (ISS) and review the ESMF being prepared to enrich his report. He also encouraged the SPIU to ensure robust consultations with affected persons and communities particularly in areas where assets and economic trees will be affected and ensure adequate compensation in line with the AfDB's OS 2. All other concerns and issues raised were adequately addressed in this ESMF.
Closing Remarks	The SPC thanked the consultant and assured that all issues raised have been noted and will be addressed.

Table 8.7: Summary of Stakeholders Consultation in Cross River State

ITEM	DESCRIPTION
Venue of Meeting	Conference Room, Cross-River State RAAMP Office
Date of Meeting	10 September, 2019
Language	English
Participation	5. SPIU 6. Representatives of Farmers 7. ESMF Consultant and his Team Full attendance is attached as Appendix 2
Introduction and Remarks	<p>The SPC welcomed the Consultant and his team and introduced members of the SPIU. Thereafter the Consultant introduced his team.</p> <p>The Consultant informed the SPIU about the objectives of ESMF and the integrated safeguard systems of AfDB. He reiterated the importance of taking cognisance of E&S issues to ensure adverse E&S impacts on the environment and the rural people who are beneficiaries are avoided or reduced to acceptable levels. He encouraged the SPIU to provide information and express their perception and concerns especially peculiar E&S issues as concerned civil works and rural settings in Cross-River State so that such issues will be captured in the ESMF and mainstreamed into subsequent ESIA/RAP to ensure project sustainability.</p>
Information, Concerns and Questions from SPIU	<ul style="list-style-type: none"> The SPC informed the Consultant about the success of the previous RAMP activities culminating in the construction of several rural roads in the State. Building on the success of RAMP, the state is now participating in RAAMP with sponsorship from the AfDB. The state is hereby using the existing structure of the SPIU but some critical staff who were relieved after the conclusion of RAMP have not been reengaged as funds are yet to be made available by the state government. The prioritization of 500km of roads and intervention areas across the state have been completed and the next stage is the engagement of E&S Consultants for safeguard instruments (ESIA, ESMP and RAP). The informed consultant that all prioritised roads will be sealed as some of the roads are in swampy areas and the entire state is prone to erosion. However, the materials for sealing have not been decided. The road width will range from 5m to 8m with 1m shoulder on both sides. The SPIU sought clarification on the issues of compensation as only economic trees and buildings were compensated during RAMP but not graves and shrines. They either tried as much as possible to avoid these cultural properties or avoid the road altogether in places where people refused to relocate their shrines and graves.
Consultation with Farmers along Nyahasang – Swamp Road	The road was observed to be very narrow with an average of 5m width, characterised by failed and impassable portion due to erosion menace including deep gullies observed along the road. Construction of the road will entail removal of assets including building fences and economic trees. Currently, most of the farmers in the areas have abandoned their farms as there is no access. The road traverses farming communities and a Fadama Market which has also been

	<p>abandoned due to poor access. The road terminates at a swampy areas where multiple commercial fishponds and abattoirs are located.</p> <p>The farmers consulted expressed delight about RAAMP and promised adequate cooperation with the SPIU and the contractors. They are willing to allow some of their economic trees be removed, if need be, even without compensation. According to them, they are willing to sacrifice whatever it takes to ensure their road is constructed. Their only appeal to the SPIU is to ensure their youths are engaged during construction.</p>
Reactions Consultant	All concerns and issues raised were adequately addressed by the Consultant and all recommendations from stakeholders were noted and documented.
Closing Remarks	The SPC thanked the consultant and assured that all issues raised have been noted and will be addressed.

Table 8.8: Summary of Stakeholders Consultation in Taraba State

ITEM	DESCRIPTION
Venue of Meeting	Conference Hall, RAAMP Office, Ministry of Rural Development, Jalingo
Date of Meeting	6 September, 2019
Language	English
Participation	<ol style="list-style-type: none"> 1. SPIU 2. Representatives of State MDAs including Ministries of Women Affairs, Works, Rural Development, Lands and Survey, etc. 3. ESMF Consultant and his Team <p>Full attendance is attached as Appendix 2</p>
Introduction and Remarks by SPIU	<p>The SPC welcomed participants and introduced members of the SPIU and the Consultant to the participants. Thereafter the participants took turn to introduce themselves.</p> <p>The SPC informed the participants that Taraba State government is partnering with the African Development Bank (AfDB) to improve rural access and agricultural marketing in Taraba State. He enumerated some of the steps taken by the state government so far to ensure participation of Taraba State, including setting up of the SPIU and engagement of all required personnel as well as provision of counterpart funding since 2017. So far the SPIU has carried out prioritization of 22 roads of total length of about 500km, agro-logistics studies (extensive studies on agro value chains), construction of pilot roads, training of key staff as well as sensitization of traditional rulers, farmers, women and youths in all affected LGAs. He also remarked that in line with the ToR and schedule of activities by the AfDB, the SPIU has invited potential E&S consultants to bid for the ESIA/ESMP and RAP consultancy. He emphasized that the SPIU has met all the requirements of AfDB so far and the next stage will be the engagement of E&S Consultants to undertake ESIA, ESMP and RAP.</p>
Introduction and Remarks by ESMF Consultant	<p>The Consultant informed participants about the objectives of ESMF which is to provide a unified process to address all E&S safeguard issues of construction activities under RAAMP to ensure compliance with the integrated safeguard system of AfDB. He reiterated the importance of taking cognisance of E&S issues to ensure adverse E&S impacts on the environment and the rural people who are beneficiaries are avoided or reduced to acceptable levels. He further appreciated the participation of a wide range of stakeholders and encouraged them to freely expressed their enthusiasm, perception and concerns especially peculiar E&S issues as concerned civil works and rural settings in Taraba State so that such issues will be captured in the ESMF and mainstreamed into subsequent ESIA/RAP to ensure project sustainability.</p>

Information, Concerns and Questions from Stakeholders	<p>The stakeholders expressed delight about RAAMP as they believe the project will open up rural areas, provide access for farmers and make life better for farmers and rural dwellers. They were happy that Taraba State is participating and also benefiting from the AfDB sponsorship. Some of the key information provided, and concerns expressed by stakeholders are presented below:</p> <ol style="list-style-type: none"> 1. The representative of the Ministry of Rural Development advocated for robust engagement with all benefitting communities to obtain vital information that can add value to RAAMP. He also emphasised that all roads to be constructed under RAAMP to be sealed as rural roads not sealed are easily washed away with gullies created making the road impassable after a few years of construction. 2. The representative of the Ministry of Women Affairs advised the SPIU to educate rural women on RAAMP activities so they can derive maximum benefits from the project. 3. She advocated sensitization of women about the impacts of labour influx. She highlighted that due to prevailing poverty in rural areas, women are easily lured by money. They can also be exploited, abused and harassed in a number of ways. 4. She further advocated for the involvement of women in all aspects of RAAMP including construction. She advised the SPIU to ensure women are deliberately targeted and empowered through RAAMP so that the benefits of the project can be maximized. 5. The representative of Ministry of Lands advised the SPIU to involve the ministry right from design stages to ensure they provide inputs and professional advice that can improve RAAMP given the peculiarity of the state as relates to road construction. 6. He informed the SPIU that women producing hand crushed rocks in the state should be patronised for construction materials as this will improve their livelihood and boost the economy of the state. He also suggested that the SPIU can empower them by organising them into cooperatives and provide crushers and other tools to increase their productivity. 7. The SSO (SPIU) remarked that now that all activities of the SPIU will be in line with the AfDB's requirements, trainings are required to familiarise them with the AfDB's E&S safeguards so they can add value to the process. 8. The representative of Permanent Secretary, Ministry of Rural Development expressed delight about RAAMP being implemented in Taraba State. He assured continuous support for the SPIU to ensure the success of the project.
Reactions from SPIU and Consultant	<p>All concerns and issues raised were adequately addressed by the SPIU with support from the Consultant and stakeholders who provided expert supports in key areas. All recommendations from stakeholders were noted and documented.</p>
Closing Remarks	<p>The SPC thanked participants for freely expressing their concerns and for raising salient issues to ensure successful implementation of RAAMP in Taraba State. He promised continuous engagement with all stakeholders throughout RAAMP implementation and assured that all issues raised have been noted and will be addressed.</p>

Table 8.9: Summary of Stakeholders Consultation in Gombe State

ITEM	DESCRIPTION
Venue of Meeting	Telephone Conversation and Email
Date of Meeting	26 September, 2019
Language	English
Participation	8. Engr. Salisu Abdullai (SPC) – 08028688229 9. Members of SPIU 10. Engr Abubakar Bappa (Permanent Secretary, Ministry of Rural Development) - 08033693427 11. ESMF Consultant and his Team
Introduction and Remarks	<p>The SPC welcomed the Consultant and his team. He introduced himself and a Senior Engineer and Permanent Secretary in the Ministry of Rural Development, which is the parent ministry coordinating RAAMP in the state. Thereafter the Consultant introduced his team.</p> <p>The Consultant informed the SPIU about the objectives of ESMF and the integrated safeguard systems of AfDB. He reiterated the importance of taking cognisance of E&S issues to ensure adverse E&S impacts on the environment and the rural people who are beneficiaries are avoided or reduced to acceptable levels. He encouraged the SPIU to provide information and express their perception and concerns especially peculiar E&S issues as concerned civil works and rural settings in Gombe State so that such issues will be captured in the ESMF and mainstreamed into subsequent ESIA/RAP to ensure project sustainability in the state.</p>
Information, Concerns and Questions from SPIU	<ul style="list-style-type: none"> • The PS informed the Consultant that the state just concluded the prioritization of about 702km of roads and intervention areas across 11 LGAs of the state. • Currently, the SPIU is in the process of further reducing the cumulative length of roads from 700km to the required 500km. • In addition, Agro-Logistics Studies has just been concluded with reports being compiled for the SPIU. The study covers farm centres, processing plants, farm trading centres, dams etc across the state. • Subsequently, the The state will be divided into Agro-Logistic Areas (ALA) to determine the locations where Agro-logistic Hubs will be constructed across the state. • The SPC informed the consultant that their team include an Environmental Safeguard Officer (ESO) and the Social Safeguard Officer. • The next step for the SPIU is to complete road prioritization and Agro-Logistics Studies and submit the Reports through the FPMU to the AfDB. • Removal of trees (including economic trees) and Passage through existing farms are being envisaged particularly where existing roads are narrow.
Reactions Consultant	<p>The consultant advised the SPIU to ensure their E&S Consultant adhere strictly to the AfDB Integrated Safeguard System (ISS) and review the ESMF being prepared to enrich his report. He also encouraged the SPIU to ensure robust consultations with affected persons and communities particularly in areas where assets and economic trees will be affected and ensure adequate compensation in line with the AfDB's OS 2. All other concerns and issues raised were adequately addressed in this ESMF.</p>
Closing Remarks	<p>The SPC thanked the consultant and assured that all issues raised have been noted and will be addressed.</p>



Plate 8.1: Consultation with SPIU and Stakeholders in Taraba state



Plate 8.2: Group Photograph with SPIU and stakeholders in Taraba State



Plate 8.3: Engagement with the SPIU in Cross-River State



Plate 8.4: Group Photograph with the SPIU in Cross-River State



Plate 8.5: Engagement with PAPs along Swamp Road in Cross-River State



Plate 8.6: Engagement with PAPs by Fadama Market along swamp road in Cross-River State.



Plate 8.7: Engagement with PAPs along Swamp Road by Fadama Market in Cross-River State.



Plate 8.8: Abandoned Fadama Market due to failed access road



Plate 8.9: Failed portion along Swamp road showing building fence that may be affected by construction



Plate 8.10: Narrow portion along Swamp road showing economic trees that may be affected by construction



Plate 8.11: Engagement with SPIU and other stakeholders in Benue State



Plate 8.12: Group Photograph with the SPIU, Benue State



Plate 8.13: Consultation with SPIU and other stakeholders in Anambra State.

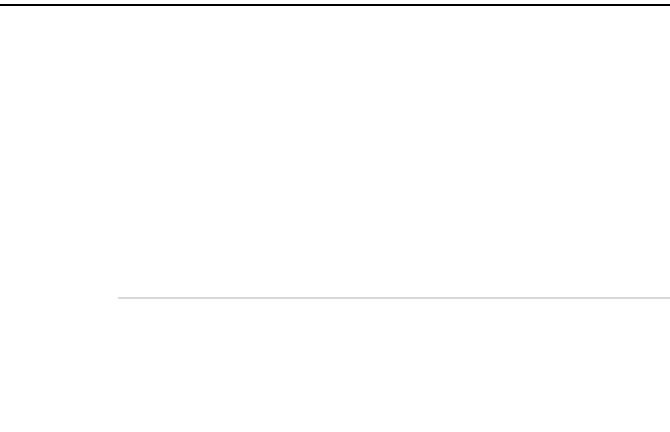


Plate 8.14: Group Photograph with SPIU and other stakeholders in Anambra State.





Plate 8.15: Engagement with a rice farmer at Ihueze community in Anambra State



Plate 8.16: Engagement with a cassava farmer at Ihueze community in Anambra State



Plate 8.17: Failed portion along Ndiowu - Anumkpu - Ihueze Road showing some erosion control paliative measure by rural communities



Plate 8.18: Vehicles experiencing difficulty in navigating failed portion along Ndiowu - Anumkpu - Ihueze Road in Orumba LGA, Anambra State

CHAPTER NINE: ESMF IMPLEMENTATION AND MANAGEMENT

9.1 Roles and Responsibilities for Managing E&S Requirements

9.1.1 RAAMP National Project Management Office's Role and Responsibilities

The Project Managements office of RAAMP at National level expected to coordinate the state and ensure proper management of the E&S issues associated with the sub-projects to meet the safeguard requirements detailed in this ESMF throughout the entire project lifecycle.

Each state will be required to commission appropriate E&S studies and conduct stakeholder engagement and cover the costs of these. It is also the Project office's responsibility to ensure that adequate information is provided so that the AfDB can review the E & S documentation prepared by the borrower and comment on compliance with the Bank's safeguard requirements. The states are also expected to allow AfDB representatives and independent consultants to access project information and records.

9.1.2 AfDB's Role and Responsibilities

AfDB support the States involved in the RAAMP project to ensure that the documentation prepared by the States (e.g. ESIA, ESMP and RAP) are aligned with the requirements of national country systems as well as the Bank's safeguard requirements.

In relation to E & S risk management for the subprojects under RAAMP, the AfDB will assign E & S officers to support the projects through all phases and ensure that there is general compliance with the requirements of this ESMF and the Bank's E & S safeguards requirements.

9.2 Institutional arrangements for the implementation of the ESMF

For the implementation of the ESMF, institutional arrangements will be required. The organizational framework for implementing the ESMF measures are set out below in terms of defined roles and responsibilities.

9.2.1 Roles and responsibilities of Main Implementing Entity

The key players are the FMEEnv, state governments and local authorities, PIU of RAAMP, the affected communities, Contractors as well as

independent/external E&S Consultants. They each have different roles and responsibilities:

- Setting applicable E&S requirements (E&S requirement setting)
- Screening for E&S risk and impacts (E&S screening)
- E&S due diligence and risk management (E&S due diligence)
- E&S monitoring
- E&S reporting
- Independent E&S audit

The functions of the individual entities that are likely to be involved in the implementation of the ESMP are summarized in Table 9.1.

Table 9.1. Roles and Responsibilities of the Main Implementing entities

No	Steps/Activities	Responsible	Collaboration	Service Provider
1.	Identification and/or siting of the sub-project	State Project Implementation Unit	<ul style="list-style-type: none"> •local authority •Relevant MDAs like Min of Agriculture, Environment, Works etc. 	
2.	Screening, categorization and identification of the required instrument (use the national EIA procedure)	Env. safeguards specialist (ESS) on the PIU	<ul style="list-style-type: none"> •beneficiary; •local authority •Social Safeguards Specialist (SSS) on the PIU 	
3.	Approval of the classification and the selected instrument by the Public EA Agency	PIU Coordinator	<ul style="list-style-type: none"> •ESS-PIU •SSS-PIU 	<ul style="list-style-type: none"> • FMEnv •
4.	Preparation of the safeguard document/instrument (ESIA, Env. Audit, simple ESMP, etc.) in accordance with the national legislation/procedure (considering the Bank policies' requirements)			
	Preparation and approval of the ToRs	ESS-PIU	SPIU	
	Preparation of the report		<ul style="list-style-type: none"> •Procurement specialist (PS-PIU) •SSS-PIU •Local authority 	• Consultant
	Report validation and issuance of the permit (when required)		<ul style="list-style-type: none"> •Procurement specialist (PS-PIU) •SSS-PIU •Local authority 	• FMEnv
	Disclosure of the document		NPIU	<ul style="list-style-type: none"> • Media; • AfDB
5.	(i) Integrating the construction phase		<ul style="list-style-type: none"> • ESS-PIU 	<ul style="list-style-type: none"> • Control Firm (Supervisor) PEA

	mitigation measures and E&S clauses in the bidding document prior they're advertised; (ii) ensuring that the constructor prepares his ESMP (C-ESMP), gets it approved and integrates the relevant measures in the works breakdown structure (WBS) or execution plan.	Technical staff in charge of the sub-project (TS-PIU)	<ul style="list-style-type: none"> • PS-PIU 	
6.	Implementation of the other safeguards measures, including environmental monitoring (when relevant) and sensitization activities	ESS-PIU	<ul style="list-style-type: none"> • SSS-PIU • PS-PIU • TS-PIU • Financial Staff (FS-PIU) • Local authority 	<ul style="list-style-type: none"> • Consultant • National specialized laboratories • NGOs
7.	Oversight of safeguards implementation (internal)	SSES	<ul style="list-style-type: none"> • Monitoring and Evaluation specialist (M&E-PIU) • FS-PIU) • Local authority 	Control Firm (Supervisor)
	Reporting on project safeguards performance and disclosure	Coordinator	<ul style="list-style-type: none"> • M&E-PIU • ESS-PIU • SSS-PIU 	
	External oversight of the project safeguards compliance/performance	PEA	<ul style="list-style-type: none"> • M&E-PIU • ESS-PIU • SSS-PIU • PS-PIU • Supervisor 	
8.	Building stakeholders' capacity in safeguards management	ESS-PIE	<ul style="list-style-type: none"> • SSS-PIU • PS-PIU 	<ul style="list-style-type: none"> • Consultant • Other qualified public institutions
9.	Independent evaluation of the safeguards performance (Audit)	ESS-PIE	<ul style="list-style-type: none"> • SSS-PIU • PS-PIU 	<ul style="list-style-type: none"> • Consultant

The Project Implementing Unit (PIU), and any institution participating in the implementation, will not issue a Request for Proposal (RFP) of any activity subject to Environmental and Social Impact Assessment (ESIA), without the construction phase's Environmental and Social Management Plan (ESMP) inserted in, and will not authorize the works to commence before the contractor's ESMP (C-ESMP) has been approved and integrated into the overall planning of the works.

This abovementioned section, on the roles and responsibilities for the implementation of the Framework ESMP, are inserted in the E&S safeguards management section the project implementation manual (PIM).

9.3 Training and Capacity Strengthening Plan

Based on the capacity assessment of the relevant Nigerian Federal and State level MDAs, Civil Society Organizations, as well as other stakeholders carried out during consultations, effective delivery of the sub-projects in relation to the implementation and monitoring of the E & S risk mitigation measures throughout the lifecycle of sub-projects may be hampered by limited technical skills and resource constraints. Institutional barriers to effective delivery that are anticipated include:

- i. Limited knowledge on E&S Safeguards Systems;
- ii. Limited knowledge on E&S issues relating to the Energy sector;
- iii. Limited knowledge on ESMF implementation as well as project specific ESIAs and ESMPs especially during construction of sub-projects;
- iv. Limited knowledge on Gender and vulnerability issues;
- v. Limited knowledge of participatory governance and stakeholder's engagement.

For effective implementation of the ESMF, there will be need for technical capacity in the human resource base of implementing institutions as well as logistical facilitation. Implementers need to identify and understand the E&S issues as concerns the implementation of sub-projects. Thus, to strengthen the respective roles and enhance robust collaboration with the relevant stakeholders, the following areas for capacity building have been identified as deserving attention for effective implementation of the ESMF.

The specific areas for effective training and institutional capacity needs are given in Table 9.2 below. An indication of the anticipated **costs for the implementation** of the capacity building program is also included in the table.

Table 9.2. Proposed Training Programs for ESMF Implementation

Training Description	Participants	Form of Training	Duration	When	Training to be conducted by who	Training Organizing Agency	Training Costs USD
AfDB's Integrated Safeguard System. Training on Operational Safeguards Policies triggered	Federal and State Ministries of Environment, RAAMP Project Implementation Unit, NESREA and other project affiliated MDAs in host States.	Workshop	2 Working days	During project preparatory stage	E & S Safeguard Consultant	AfDB	10,000
Gender Considerations (Equity, Environmental, Social and other project specific issues of concern affecting Women, Children and other Vulnerable groups)	Gender specialists from Federal and State Ministries of Environment, RAAMP Project Implementation Unit, NESREA and other project affiliated MDAs in host States.	Workshop	1 Working day	During project preparatory stage	E & S Safeguard Consultant	AfDB	6,000
Environment and Social Assessment: E & S Process, E & S Considerations in sub-project activities, Environmental components affected during construction and operation stages; Environmental management and Best practice; Stakeholder participation Project Screening & Scoping Physical Cultural Resources, SESA, HIA e.t.c	RAAMP Project Implementation Units at Federal and State Levels	Workshop	1 Working day	During project preparatory stage	E & S Safeguard Consultant	AfDB	6,000

Training Description	Participants	Form of Training	Duration	When	Training to be conducted by who	Training Organizing Agency	Training Costs USD
Environmental due diligence: ESMF/ESIA/ESMP Implementation, Monitoring, Evaluation and Reporting during construction of sub-projects,	RAAMP Project Implementation Units at Federal and State Levels	Workshop	1 Working day	During project preparatory stage	E & S Consultant	AfDB	4,000
Total							26,000

* Training cost is tentative, the actual training cost will be prevailing exchange rate

* It has been considered that all training will be delivered in Abuja over a 5 day period in one location. The indicative training costs, do not include the costs of delegate's travel from their states to Abuja as well as daily per diems. These will be borne by the States.

9.4 ESMP and RAP implementation monitoring and reporting

A series of E&S instruments (templates) have been designed for use to manage the E&S activities that will be developed along the project cycle, organize the processes, and keep records of the process.

The management instruments identified for the different stages of the project cycle are the:

- i. Environmental and Social Screening Form (ESSF);
- ii. Environmental and Social Monitoring Report (ESMR) ;
- iii. Environmental and Social Final Report (ESFR);
- iv. Quarterly Environmental and Social Implementation reports.

The ESSF, ESMR, and ESFR are internal tools to be used in daily routine activities, while the Quarterly Implementation reports are external documents to be shared with AfDB. **Annex 1** contains templates of these internal management instruments including screening and categorization.

The specific details of each of these reporting instruments are presented in Table 9.3 below.

Table 9.3. ESMP and RAP implementation and reporting Instruments

Project Stage	Reporting Instrument	Description
Identification Stage	Environmental and Social Screening Form	The ESSF is the first management instrument to be created by the developers during the first stage of the project cycle (Identification Stage) to identify the potential E&S risks, their categorization, and the level of E&S studies required by the sub-project to be conducted during the assessment stage.
Implementation Stage	Environmental and Social Monitoring Report	The report can be during works execution to follow up and monitor the implementation of the E&S measures identified in the ESMPs. The ESMR contains basic information about the periodic field visits, the persons who visited the sub-project, the E&S aspects observed during the site visit, and recommendations for the developers/contractor.
	Quarterly Implementation Reports	The Client will be required to prepare Quarterly Implementation reports on the E&S performance of the project, including updates on the

Project Stage	Reporting Instrument	Description
		implementation of the E&S Management and/or Action Plans. The reports will be submitted to the AfDB for review purposes.
	Environmental and Social Final Report	The ESFR is the fourth and final management instrument and can also be used once the sub-project's works execution has ended to verify compliance with the E&S measures agreed upon in the plans.

Environmental and Social Monitoring

This section of the ESMF outlines the approach to be used by AfDB for monitoring E&S performance on sub-projects considered in the Program.

As the project developer, RAAMP will have overall responsibility for the application for the risk management tools detailed in this ESMF to the sub-projects under RAAMP. The E & S tools to be applied will be appropriate to the project category, once it has been assessed and assigned.

RAAMP is responsible for the implementation of the ESMP / RAP and shall diligently monitor their implementation by:

- i) ensuring that the indicators identified in the project implementation documents are respected;
- ii) ensuring compliance with the Bank's ISS;
- iii) ensuring adherence to the E&S covenants of the financing agreement.

RAAMP project implementation unit shall then report the implementation of the ESMP/RAP to AfDB as part of the **Quarterly Implementation Reports** that it submits to the Bank. These reports shall clearly identify the results achieved in implementing the ESMP and key management and monitoring tasks.

The monitoring activities for each sub-project are determined on the basis of the E&S risks and impacts associated with the project identified during the E&S assessment. They may also reflect any significant stakeholder concerns and include an E&S project completion review or audit, where relevant. As a minimum, AfDB reviews the Quarterly Implementation reports prepared by clients on the E&S performance of the project, including updates on the implementation of the E&S Management and/or Action Plans. AfDB may also, as necessary, undertake site visits to review the compliance of the project with agreed E&S requirements. Under the program, external consultants may also

be used to ensure compliance with the ESMF requirements as well as the safeguard requirements of the AfDB.

The AfDB shall review the Quarterly Implementation Reports and engage in implementation support missions, through which they shall assess and report on ESMP/ RAP implementation. Whenever non-compliance is observed or unexpected impacts arise, AfDB shall request RAAMP to review the ESMP / RAP in collaboration with relevant stakeholders, as appropriate. Changes to the ESMP / RAP must be cleared by AfDB before being implemented.

If the client fails to comply with its E&S commitments, as set out in the legal agreements, the AfDB may agree with the client remedial measures to be taken by the client to achieve compliance. If the client fails to comply with the agreed remedial measures, AfDB may take such action and/or exercise such remedies contained in the financing agreements that it deems appropriate. AfDB will also review with the client any performance improvement opportunities related to projects. On the other hand, monitoring arrangements for sub-projects proponents will be categorized into two categories.

- i. Firstly, routine E&S Monitoring reports which will be prepared during the works execution to gauge for implementation of agreed parameters/aspects in the mitigation plans.
- ii. Secondly, Quarterly Monitoring reports, will be used.

REFERENCES

African Development Bank Group. (2013). Integrated Safeguard System: Policy statement and operational safeguards. Safeguards and Sustainability Series. Volume 1 - Issue 1 (Dec. 2013)

African Development Bank Group. (2015). Environmental & Social Assessment Procedures (ESAP). Safeguards and Sustainability Series. Volume 1 - Issue 4 (November 2015)

Federal Project Management Unit (2018). Environmental and Social Management Framework (ESMF) For Rural Access and Agricultural Marketing Project (RAAMP).

Imhangulaya, Catherine. (2016). Geomorphology and Hydrology of the Benin Region, Edo State, Nigeria. International Journal of Geosciences. 07. 144-157. 10.4236/ijg.2016.72012.

International Union for the Conservation of Nature (IUCN, 2015) Red List of Threatened Species, Version 2.

Ministry of Mines and Steel Development (2019). Nationwide Baseline Studies of Heavy Metal Pollution at Selected Mining Sites.

National Bureau of Statistics. (2017). National Population Estimates based on National Population Commission (NBC) Population Census of 2006.

National Population Commission (2006). PHC Priority Tables – National Population Commission". Population.gov.ng. Retrieved 2019-03-07.

Obaje, N.G. (2009). Geology and Mineral Resources of Nigeria. Springer-Verlay Berlin.pp 19-20.

Omeje, K. (2013). Avoiding the natural resource curse: Lessons from Nigeria and Policy Implementation. African Journals Online. Vol 42 (4).

APPENDIX 1A. E&S Screening Form

PART A: GENERAL INFORMATION

Project Name	
Estimated Cost ()	
Project Site	
Project Objectives	
Proposed Main Project Activities	
Name of Evaluator/s	
Date of Field Appraisal	

PART B: BRIEF DESCRIPTION OF THE PROPOSED ACTIVITIES

--

Provide information on the type and scale of the construction/rehabilitation activity (e.g., area, land required and approximate size of structures)

Provide information on the construction activities including support/ancillary structures and activities required to build them, e.g., need to quarry or excavate borrow materials, water source, access roads, etc.

Describe how the construction/reconstruction activities will be carried out. Include a description of support/activities and resources required for the construction/rehabilitation.

PART C: E&S ELIGIBILITY CRITERIA

Criterion	Yes or No
1. Would the project displace or involve relocation of more than 50 homes or a population of 200 or more?	
2. Would the project encroach or be located inside a protected area of natural habitat?	
3. Would the project displace, modify or render inaccessible a Cultural Heritage site or structure?	
4. Would the project be located in the territory of any historically underserved traditional ethnic community or indigenous people (as defined by World Bank OP 4.10) territory, but that the project would not benefit them in terms of access to electricity or in terms of some other plans?	
5. Is the project assessed to be Category A based on Part E of this form?	

If the answer to at least one of these questions is yes, then the project would not qualify for funding under the program. (The project may be returned to the proponent for modification to meet with the criteria.)

PART D: SCREENING FORM FOR IDENTIFICATION OF AfDB OSS TRIGGERED AND IDENTIFICATION OF APPROPRIATE SAFEGUARD INSTRUMENT

AfDB OSS	Triggered		If YES (Reason/details)	Safeguard Instrument/Docu- ment Needed
	YES	NO		
OS1- Environmental Assessment and Mgt of ES Risks and Impacts				
OS5 – Labor and Working Conditions				
OS4 – Resource Efficiency and Pollution				
OS2 – Land Acquisition and Involuntary Resettlement				
OS3 -Biodiversity Conservation and Sustainable Mgt of Living Natural Res.				

PART E. RISK CATEGORIZATION

Check the one that applies	If answer is yes,
Would the Project involve: activities with potential significant adverse environmental and/or social risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented?	Project is Category 1:
Would the project involve: activities with potential limited adverse environmental and/or social risks and impacts that individually or cumulatively, are few, generally site-specific, largely reversible, and readily addressed through mitigation measures?	The project is Category 2 -
Would the project involve: only activities with minimal or no adverse environmental and/or social risks and/or impacts?	Category 3

Guidance: The guidance for sub-project categorization and triggering OSs is available in the AfDB ESAP document, Category 1, 2, 3.

Conclusion and Safeguards Instruments Required

The sub-project is classified as a Category _____ project as per AfDB's ESAP, and the following safeguard instruments will be prepared:


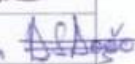
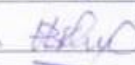
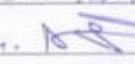


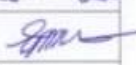
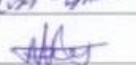

1. _____
2. _____
3. _____
4. _____

APPENDIX 2: ATTENDANCE SHEETS FOR CONSULTATIONS

ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF) AND RESETTLEMENT POLICY FRAMEWORK (RPF)

FOR RURAL ACCESS & AGRICULTURAL MARKETING PROJECT (RAAMP) IN TARABA STATE

ATTENDANCE SHEET

S/N	NAME	PHONE NUMBER	ORGANISATION	E-MAIL	SIGNATURE
1	Moses Orume	08065488004	RAAMP	mosespruma@gmail.com	
2	DAVID SAMUEL DOGO	07068161981	MOW & T	daviddogo4dopejo@gmail.com	
3	Sarah Richard	08068695113	ITW/ABC	sarahrichard@yahoo.com	
4	David N/ah	09032865543	RAAMP	davidn/ah@gmail.com	
5	Brunel A Yaro	08135091685	RAAMP	brunel@yahoo.com	
6	DANLADI IKE	0803857957	RAAMP	ikodan/kumbar@gmail.com	
7	Eng. Finlek Emmanuel	08069658075	RAAMP	finlekemmanuel@yahoo.com	
8	Adesiyen Turde	08062832449	Ecosphere Consulting Ltd.	babatundeadesiyen@gmail.com	
9	Semayo Adebayo	08173711313	Ecosphere Consulting Ltd.	Semadebayo@gmail.com	

FOR RURAL ACCESS & AGRICULTURAL MARKETING PROJECT (RAAMP) IN TARABA STATE

ATTENDANCE SHEET

[illegible]

ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF) AND RESETTLEMENT POLICY FRAMEWORK (RPF)

FOR RURAL ACCESS & AGRICULTURAL MARKETING PROJECT (RAAMP) IN ANAMBRA STATE

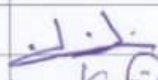
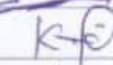

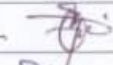




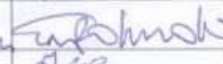
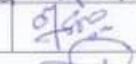
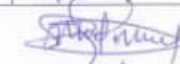
ATTENDANCE SHEET

S/N	NAME	PHONE NUMBER	ORGANISATION	E-MAIL	SIGNATURE
1.	Ezeanolue Sylvester	08035450274	HD (P.Fenu)	Sschezanolue@gmail.com	[Signature]
2	Okoli Abiodun	08034510714	PG Ndriawa Town	ndriawatown@nigeria.com	[Signature]
3.	Nkale Lyke	08033906088	P.S. Umunah	Saggslyke@yahoo.com	[Signature]
4	Joe Onyejekwe	08036536170	P.C (Anambra)	joeonyejekwe@gmail.com	[Signature]
5	Obianom Kenechutim	08063719465	Min of Env.	kaccychnis@gmail.com	[Signature]
6	Odeegun A.U.	08033712862	Mu. J. Sun	odeegunam@gmail.com	[Signature]
7	Nwafor Chibuike	08161287713	Ernest Uko Farms	Nwafor 294@gmail.com	[Signature]
8	Okoli Enaka	08068489060	Min. of Agric	enakaokoli@gmail.com	[Signature]
9	Okoli Oliver	07037833373	Min. of Agric	Oliver Okoli	[Signature]
10	Engr. Ifeanyi Anarado	08068908586	AN- RAAMP	ifeanyianarado@gmail.com	[Signature]
11	Nwae Margaret-U	08060650078	AN- RAAMP	margaretnwae@gmail.com	[Signature]
12	Okoli Angela O.	08034305378	AN RAAMP	ujire2019@gmail.com	[Signature]
13	Ani Rachael O	07063028081	AN RAAMP	enirachaelchyp@gmail.com	[Signature]

ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF) AND RESETTLEMENT POLICY FRAMEWORK (RPF)

FOR RURAL ACCESS & AGRICULTURAL MARKETING PROJECT (RAAMP) IN ANAMBRA STATE

ATTENDANCE SHEET

S/N	NAME	PHONE NUMBER	ORGANISATION	E-MAIL	SIGNATURE
1	EZEANI C C	0803503922	RAAMP		
2	Obianom Kenechukwu	08063719465	MAN OF ENV	Kecychn@gmail.com	
3	Odiegwu A-U.	08033712862	Man of Env	adiegwuand@gmail.com	AA
4	Nwafor Chibueze	08161287713	Ernest Uko Farms	Nwafor294@gmail.com	
5	Okoli Eneke	08068489000	Ministry of Agric	enekaokoli6@gmail.com	A. E. Okoli
6	Okoli Oliver	07037833375	Min. of Agric	oliverokoli58@gmail.com	
7	IFEJI ODERA VALENTINE	08037332841	RAAMP	deravalen@gmail.com	
8	NWAFOR CHIBUEZE	07067925757	Chibueze Nwafor	chibuezenwafor@gmail.com	
9	Adesiyin Babatunde	08062832449	ECOSPHERE CONSULTING LTD	babatundeadesiyin@gmail.com	
10	Seunayo Adedayo	08173711313	ECOSPHERE CONSULTING LTD	seunadebayo2@gmail.com	
11	Engr. M. A. IFEJANA		MOA		
12	Engr. EMEKA CHIJIOKA	08089779310	PS WKS	emekechijioka@yahoo.com	
13	Festus NWOSU	08083004610	Community Elder		
14	Sunday Ugochuku	08033400989	Farmer		

ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF) AND RESETTLEMENT POLICY FRAMEWORK (RPF)

FOR RURAL ACCESS & AGRICULTURAL MARKETING PROJECT (RAAMP) IN CROSS-RIVER STATE

ATTENDANCE SHEET

S/N	NAME	PHONE NUMBER	ORGANISATION	E-MAIL	SIGNATURE
1	Usani Otu	08062876059	CR-Ramp	usanio1@gmail.com	Utu
2	Gabriel Ugar	08067504981	✓	gabseogare@gmail.com	Ugar
3	Eng. Benson Ogburn	08035493335	CR Ramp	ogburnbenson1@gmail.com	Ogburn
4	Eng. Charles N. Okongeh	08037029993	✓	engrchonubi@yahoo.co.uk	Okongeh
5	Adesijan Babatunde	08062832449	Ecosphere Consulting Ltd	babatundadesija@gmail.com	Adesijan
6	Semayo Adelayo	08173711313	Ecosphere Consulting Ltd.	semadelayo@gmail.com	Semayo
7	Bassey Francis Otu	08129840181			Bassey
8	Mrs Ruth Daniel Jacob	08138237340			Ruth
9	Terry Boco	07068653644		terryn33@gmail.com	Boco
10	Udeme Sunday Akpan	08161539863			Udeme
11	Michael Bassy	08128676404			Bassy
12	Beauty Odeme	08066531051			Beauty
13	Nkechere, A. O.	08063922517			Nkechere

ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF) AND RESETTLEMENT POLICY FRAMEWORK (RPF)

FOR RURAL ACCESS & AGRICULTURAL MARKETING PROJECT (RAAMP) IN BENUE STATE

ATTENDANCE SHEET

S/N	NAME	PHONE NUMBER	ORGANISATION	E-MAIL	SIGNATURE
1	ESU Idikwu Paul	0805939688	Min. of Lands	PaulIdikwu78@gmail.com	Paul
2	Ir. Solomon Shamee, C.sip.	08061596029	Religious (JPIC)	shameesolomon@gmail.com	Shamee
3	Engr. Olofu Emmanuel	08039459487	Min. of Agric.	emmanuelolo19@gmail.com	Emmanuel
4	IZOBO, LUCKY E	08028327447	Min. of Agric.	izobolucky@gmail.com	Lucky
5	Thomas Unongo	08065013192	MANR	unongoatt@hotmail.com	Thomas
6	Ikum Terungwa	07031249847	Bureau of LG & CA	terungwaikum@gmail.com	Ikum
7	ISHUWA, NOM	0706706659	INFORMATION	ishuwanom@gmail.com	Nom
8	Lady Helen Afam	07030696350	MOA & NR (PS)	helenafam00@gmail.com	Helen
9	Engr. Nathan Dweem	08087333329	" " (PC)	nathan.dweem90@yahoo.com	Nathan
10	hon Terwase Anabakaa	07030775971	House of Assembly	terwaseanabakaa@gmail.com	Terwase
11	Abakuma Bibiana O	07030401130	BENSTEN (SPU)	abakumabibiana@gmail.com	Bibiana
12	TONDO TERYIMA	08092485061	Youth Leader		T.T
13	Semayo Aalebayo	08173711313	ECOSPHERE CONSULTING LTD.	semayoalebayo@gmail.com	Semayo

ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF) AND RESETTLEMENT POLICY FRAMEWORK (RPF)

FOR RURAL ACCESS & AGRICULTURAL MARKETING PROJECT (RAAMP) IN BENUE STATE

ATTENDANCE SHEET

S/N	NAME	PHONE NUMBER	ORGANISATION	E-MAIL	SIGNATURE
1.	Imedeechia Utile	08037050949	Principal Consultant	utillebe@gmail.com	
2	ADONGU SAAKU	08168404515	AFAN	saakuaadongu@gmail.com	
3	EMR D.T. UYE	08082758777	Viable Engin	uye4dte@gmail.com	
4	Engr. Sende, I.T.	08065507566	M.O.W.T & E	sendeigat@gmail.com	
5	Engr. Wilam Terkura	07038180928	MRDC MKd	engrterkura@gmail.com	
6	SIMON O. KWAGHZA	08069817688	Agribusiness Ltd	kwaghaos@gmail.com	
7	Tutu U-T	08065103185	M.O.A	thutit@yahoo.com	
8	TERSO AGUA	08034765204	Civil Society Org. - Benue (CSO-E)	terteragwa@gmail.com	
9	Tor-Wombo Jacynthe	07037779571	Benue State Planning Com.	torwombojacynthe@gmail.com	
10	IGBA MOSES AONDOKAA	07036190173	MIN. OF WOMEN AFFAIRS	igbamoses82@gmail.com	
11	DR. GABRIEL T. AMUSE	0503509555	MIN. OF AGRIC. & LAND OFFICER	masgabriel@yahoo.com	
12	Adum Awar O.	080-28599487	MAWR	awaradum@gmail.com	
13	DOUGLAS ORATA	08065971661	HIGHER IRRIGATION SUPT (MAWR)	ddorata2@yahoo.com	
14	Stephen Ijoh	08138121237	MAWR	ijohstephen@gmail.com	