

ENVIRONMENTAL AND SOCIAL PERFORMANCE AUDIT



PHWC

Port Harcourt Water
Corporation

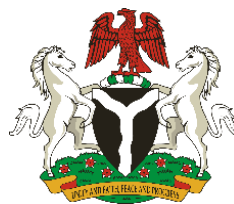
MARCH 2025



FINAL
REPORT

Environmental & Social Performance Audit

URBAN WATER SECTOR REFORM & PORT
HARCOURT WATER SUPPLY AND
SANITATION PROJECT



UWSR/PHWSSP

Urban Water Sector Reform
& Port Harcourt Water
Supply and Sanitation Project

EXECUTIVE SUMMARY

ES 1: Background

The Rivers State Government (RVSG) through the Port Harcourt Water Corporation (PHWC) is implementing the Urban Water Sector Reform and Port Harcourt Water Supply and Sanitation Project (UWSR & PHWSSP); comprising of five (5) Components - **Component 1: Water Supply & Sanitation Infrastructure in Port-Harcourt; Component 2: Institutional Support to PHWC; Component 3: Hygiene, Sanitation and Environment in Port-Harcourt; Component 4: Urban Water Reform at Federal Level and Component 5: Project Management.** The project is part of a sector wide institutional reform program embarked on by the Rivers State Government and is currently being implemented with co-financing support by the African Development Bank (AfDB) (USD 200 million) and the Rivers State Government (USD 40 million). Particularly, the PHWSSP aims to provide sustainable access to safe drinking water and sanitation to the residents of Port-Harcourt city in Rivers State (specifically, Port Harcourt and Obio/Akpor Local Government Areas {LGAs}) covering the most densely populated areas with high water and sanitation stress. The current population of the project area is about 1.47 million, out of which the population of Port-Harcourt and Obio/Akpor LGAs is 792,415 and 680,295 respectively, (*World Population Review, 2024*). As a result of the project, the citizens of Port-Harcourt will benefit from improved water supply including increased quantity, quality and service hours, which is expected to improve their health and productivity. Residents will also gain better health from improved environmental and sanitary conditions; especially those frequenting the market places and motor parks. Furthermore, benefits include formal jobs due to scaled-up services at PHWC and private operators managing water kiosks and public sanitation facilities.

ES 2: E&S Performance Responsibilities for Project Implementation

Prior to the commencement of civil works, the project prepared an Environmental and Social Impact Assessment (ESIA) which identified several potential adverse Environmental and Social (E&S) risks and impacts associated with the intervention works as well as suitable mitigation measures and monitoring responsibilities necessary for ensuring compliance of intervention works with E&S requirements of the AfDB's Integrated Safeguard Systems (ISS). In 2020, a first upgrade of the ESIA was prepared to capture new monitoring responsibilities as a result of the administrative changes in the Water, Sanitation and Hygiene (WASH) sector in Rivers state. Similarly, in 2024 an additional upgrade of the ESIA was prepared. It is noteworthy to state that a Resettlement Action Plan (RAP) was also prepared for the subprojects. Consequently, the UWSR & PHWSSP has applied part of its proceeds for consultancy services for the preparation of an Environmental and Social Performance Audit, coordinated by its Project Implementation Unit (PIU) of the PHWC. The E&S Performance Audit (ESPA) is expected to assess the level of compliance of the project (from inception till date – 2021 to 2024) with the applicable E&S requirements of the relevant Operational Safeguards (OSs 1-5; **See Chapter 2**). The ESPA specifically assesses the extent of compliance with the E&S requirements of the financing agreement, including national legislations, regulations and procedures, the Bank's ISS and Good International Industry Practices (GIIPs) of the WASH sector.

ES 3: Inventory of Sub-projects and Aligning Safeguard Instruments Prepared

The PHWSSP has designed and is currently implementing several sub-projects/intervention works, primarily under **Component 1 – Water Supply and Sanitation Infrastructure in Port Harcourt.** The total length of the transmission and distribution networks covered by these works is 23.183 km and 472.3 km, respectively. The project sites include Rumola I, Rumola II, Rumola III, Moscow, Borokiri, and Diobu. The Work Packages (WP) and description of activities for the Lots are presented as follows in the Table below:

Work Package 1: Water Production System and Ancillary Works	Work Package 2: Water Transmission and Distribution Systems
<ul style="list-style-type: none"> Lot 1 (Rumuola I): Rehabilitation and Mechanization of Boreholes, Laying of Transmission Pipelines and Rehabilitation and Construction of Miscellaneous Buildings - Rumuola I – Revised Estimated Total Cost (RETC) 1,2&3 Lot 2 (Rumuola II): Laying of Transmission and Distribution Pipelines in Rumuola, Construction of Elevated Water Tank (EWT) and Construction and Rehabilitation of Tank and Miscellaneous Buildings - Rumuola II RETC 1,2&3 Lot 3 (Rumuola III): Drilling and Mechanization of Boreholes, Laying of Raw Water Transmission Mains and Construction of Treatment Plant and Miscellaneous Buildings - Rumuola III RETC 1,2&3 	<ul style="list-style-type: none"> Lot 1 (Moscow): Laying of Transmission and Distribution Pipelines in Moscow, Construction of Elevated Water Tank (EWT) and Construction and Rehabilitation of Tank and Miscellaneous Buildings - Moscow RETC 1, 2 & 3 Lot 2 (Borokiri): Laying of Transmission and Distribution Pipelines in Borokiri, Construction of Elevated Water Tank (EWT) and Construction and Rehabilitation of Tank and Miscellaneous Buildings - Borokiri RETC 1, 2, 3 & 4 Lot 3 (Diobu): Laying of Transmission and Distribution Pipelines in Diobu, Construction of Elevated Water Tank (EWT) and Construction and Rehabilitation of Tanks and Miscellaneous Buildings - Diobu RETC 1, 2, 3 & 4

The full details on the intervention works and titles of the instruments prepared is provided in chapter 3 and Chapter 5 respectively, in this ESPA report.

ES 4: Audit Methodology

The methodology or technical approach adopted for this E&S Performance Audit is a stepwise process involving; i) *Strategic Planning, Activity Scheduling and Logistics Arrangement with the PIU and subsequently, contacts at the various facilities or locations (Rumuola I, II, & III; Moscow; Borokiri; Diobu), ii) Stakeholder identification to ascertain what group of persons or individuals require to be consulted for the purpose of the audit, iii) Inventory of Subprojects and Documents Collections (E&S Instruments such as the ESIA, RAP, GRM, E&S Monitoring Reports, Aide Memoirs), iv) Documents Review – precisely management plans for preparation of site-specific Audit Checklists to assess the level of adherence to specified E&S Instruments, v) Use of Scoring Criteria to evaluate compliance, (vi) Sampling of Project Affected Persons (PAPs) compensated or resettled under the project for the purpose of assessing the resettlement program, Grievance Redress, Mechanism (GRM) under this program as well as the impacts from livelihood restoration or enhancement, vii) Field Visits, and (viii) Gaps Identification, recommendation of Corrective Actions and Preparation of an Action Plan.*

Guiding Principles and Standards on which this audit is based on, include:

- Compliance to provisions (Mitigation and Monitoring responsibilities) in safeguard instruments such as the Environmental and Social Management Plan (ESMP) contained in the Environmental and Social Impact Assessment (ESIA), Resettlement Action Plan (RAP) and Grievance Redress Mechanism (GRM).
- Compliance to the AfDB Operational Safeguards relevant to the project.
- Compliance to Nigerian Environmental and Social legislation including the Nigeria Environmental Impact Assessment (EIA) Act Cap E12 LFN, Land Use Act 1978, Nigeria Labour Act, CAP L1, LFN (2004), Employees' Compensation Act 2010, Discrimination against Persons with Disabilities (Prohibition) Act (2018).
- Compliance to general environmental and social management and monitoring responsibilities.
- Compliance to the AfDB's Advisory Note on Preventing, Mitigating, and Responding to Sexual Exploitation, Abuse and Harassment (SEAH) within AfDB Operations [2022].

ES 5: Audit Checklist

The scoring criteria or rating system for the Checklists was stratified from 'compliance' to 'major non-conformance' to convey a concise and consistent method for scoring each audit finding. At the end of the audit, the findings were transferred into an Excel spreadsheet to create charts, summary tables and trend data which have been included in this ESPA report. Additionally, where audit findings did not permit the application of the scoring criteria, an alternative criterion based on a simple "YES or "NO" was applied.

ES 6: General E&S Management & Documentation Performance (2021-2024)

The general E&S implementation and documentation performance for the Project Implementation Unit (PIU) Safeguards Unit, Supervisory Consultants and Contractors was based on a performance rating of 0 – 5 (“No Documentation”, “Poor”, “Fair”, “Good”, “Very Good” and “Excellent”). Subsequently, parameters established for the assessment were obtained from the monthly E&S supervision reports shared to the ESPA Consultant by the PIU. The findings from the assessment of general E&S management and documentation performance from 2021 to 2024 are extensively captured in Chapter 5 of the ESPA report. Nonetheless, some findings from the comparative E&S performance assessment of the PIU Safeguards Unit, Supervisory Consultants and Contractors are summarized.

The General E&S management and documentation performance differs from the Safeguards mitigation and monitoring compliance captured in Chapter 6 of the ESPA Report, which assesses compliance to responsibilities established in the project safeguards documents (ESIA, RAP and GRM).

Project Implementation Unit (PIU)

The determination of the effectiveness of general E&S management and documentation carried out by the PIU for the period of 2021 – 2024 shows interesting findings. While Contractors prepared and submitted Contractors' Environmental and Social Management Plans (C-ESMPs) which were reviewed secondarily by the PIU, the safeguards unit accepted C-ESMPs which were void of requisite management plans proffered in the ESMP necessary for Contractors to prepare/document in their respective C-ESMPs prior to civil works implementation. Significantly, the C-ESMPs do not contain Traffic Management Plans (TMPs), Waste Management Plans (WMPs), Occupational Health and Safety Management Plans (OHSMPs), Asbestos Management Plans (AMPs), Emergency Response Plans (ERPs), Labour and Employment Plans, Borrow Pit Management Plan, Community Health and Safety Management Plan, Security Management Plan, and Campsites and Staging Areas Management Plans, which in turn affects the quality of prepared C-ESMPs in demonstrating the Contractors' roadmap to ensuring E&S requirements are met. Furthermore, the PIU has shown weakness in providing adequate safeguards advisory on needed amendments necessary to improve the quality of the C-ESMPs. Such gaps have resulted in some forms of major non-conformance as regards to ESMP mitigation and monitoring responsibilities for Contractors and PIU respectively (particularly in the areas of complying to requirements for TMPs, WMPs, OHSMPs, BPMP and AMPs). Notably, there has been **“Very Good”** secondary monitoring on waste management, management of disused oils, and housekeeping. The analysis of the monitoring on Labour and Working conditions by the PIU shows a steady improvement from **“Fair”** to **“Very Good”** from 2022 – 2024.

Supervisory Consultant(s)

There are no reports for 2021 and 2024 for critical E&S performance parameters. This however does not mean that general E&S performance monitoring was not carried out but rather reflects poor document management. Remarkably, the Supervisory Consultant was able to consistently perform between **“Very Good”** and **“Excellent”** for the years 2022 and 2023, precisely in the areas of i) sampling of environmental media, ii) supervision of C-ESMP implementation, iii) waste management monitoring, iv) monitoring of PPEs procurement, distribution and use, v) Monitoring of training on E&S/Health, Safety and Environment (HSE), vi) labour and working conditions, vii) traffic management, viii) supervision of disused oil management, ix) assessment of workers GRM, x) housekeeping documentation, xi) revegetation monitoring, and xii) Occupational Health and Safety (OHS). However, there are opportunities for improvement in the areas of validating C-ESMP quality, such that C-ESMPs prepared by Contractors capture and address their plans for i) traffic management, ii) waste management, iii) OHS management iv) asbestos management, v) emergency response, and vi) labour and employment, consistent with the requirements of the ESIA/ESMP. Additionally, Supervisory Consultant performed poorly in supervising and enforcing management of asbestos where required (e.g., disused asbestos pipes were seen during field visits for the ESPA conducted in September 2024 at Diobu pumping station), and also in providing documentation showing the Contractors management of its equipment staging areas and workers campsite. As regards labour and working conditions, where supervision and monitoring has been deemed **“Very Good”** in this ESPA, the Supervisory Consultant provided details and recommendations as regards; Contractors ensuring that they provide their workers with formal letters of engagement or contracts. This is mainly applicable to unskilled personnel. Secondly, the reports on labour and working conditions also show recommendations made by the Supervisory Consultant as regards the provision of medical retainership services for workers, which in their report were not provided for staff by most of the Contractors (2022 and 2023). Notably, there is **“Good”** documentation detailing the occurrence of incidents and accidents for the years 2022 and 2023. However, accidents reports should be more detailed, probably standalone, showing pictures, a Root Cause Analysis (RCA) and a corrective action plan to prevent similar occurrences. **See Section 5.5 for more details.**

Contractors

Similarly, as in the case of general E&S management and documentation performance for the PIU safeguards unit and Supervisory Consultant(s), no reports for Contractors were submitted for 2021. There were also no reports for 2022 – 2024. Documentation provided by Contractors, were mainly progress reports containing technical details of the milestones achieved in their civil works implementation, and excerpts of HSE trainings/toolbox meetings. No details on E&S safeguards were provided in the progress reports. The performance rating was achieved by reviewing Contractors' performance captured in the Supervisory Consultant's Monthly **E&S Safeguard Compliance Reports** and PIU's **Monthly E&S Implementation Monitoring Reports**. Summarily, accessing E&S documentation was difficult even for the HSE officers of the respective Contractors who are assigned E&S responsibility. This is because the E&S documentation for their intervention works is in custody of top-level management. Furthermore, there has also been difficulty in sharing any type of E&S documentation owned by the Contractor due to stringent internal organizational bottlenecks. However, available documentation from the Supervisory Consultant's reports shows progressive improvement ("Very Good" to "Excellent") in waste management from 2022 – 2024. This also applies for management of disused oils, ("Poor" to "Good" to "Very Good" for 2022, 2023 and 2024 respectively). Additionally, there is also progressive improvement in the management of other hazardous wastes such as E-wastes and batteries. It may be proper to state that areas such as traffic management and asbestos management where performance was poor may be as a result of failure to develop plans in their respective C-ESMPs, to address these issues. Contractors did not provide E&S trainings for their workforce, although this is also dependent on if the PIU safeguards unit empowered Contractors with requisite knowledge on the Operational Safeguards relevant to the PHWSSP and national E&S regulatory provisions. It is noteworthy to state that in March 2022 and September 2024, the AfDB delivered a training on safeguards organized by the PHWC PIU. The training was administered to requisite personnel of the PIU, Supervisory Consultants and Contractors in the AfDB office in Abuja, Nigeria. Additionally, AfDB organized a virtual training for all AfDB funded projects in the Water and Sanitation sector in Nigeria from 15 to 16 July 2021. PHWSSP PIU benefitted from training.

ES 7: Assessment of Mitigation and Monitoring Responsibilities Compliance to Safeguards Instruments Requirements

Following the rating system captured in the checklist with a stratification for i) Compliance ii) OFI, iii) Minor Non-Conformance and iv) Major Non-Conformance, the details of ESMP Mitigation and Monitoring compliance are provided in the Table below:

ESMP Mitigation and Monitoring Compliance

Compliance	OFI	Minor Non-Conformance	Major Non-Conformance
<ul style="list-style-type: none"> Provision and enforcement of the use of PPEs Use of RIWAMA approved waste vendors for evacuation, processing and disposal of construction wastes Training/sensitization of workers on GBV (including SEAH) and STIs/STDs Hiring and deployment of competent security to project sites Hiring of unskilled locals for labour and prohibition of child/forced labour Application of a phased approach to pipe laying activity Responding promptly to noise complaints Ensuring strict controls of timing of activities, e.g. 	<ul style="list-style-type: none"> Noise control Provision of basic amenities at workers campsites/lodging areas Management of hazardous wastes e.g. disused asbestos pipes Establishment and functionality of workers GRM Evacuation of mobile toilets Regular maintenance of vehicles to avoid leakages and potential soil contamination Developing an induction program including a code of conduct for all workers Use of appropriate road safety signage and on-site trained flagman with high-visibility vests to direct 	<ul style="list-style-type: none"> Ensure construction of effective drainage system and use erosion protection structures such as sediment traps, riprap, gabions etc., where required. 	<ul style="list-style-type: none"> Preparation and implementation of requisite ESMP management plans such as Labour and Employment Plans (LEMPs), WMPs, TMPs, OHSMPs, Emergency Response Plan (ERP); RAP implementation and compensation of PAPs (discussed in Subsection 6.2.3) Rehabilitation of blocked drains to channel wastewater to receiving bodies Undertaking a water study prior to abstraction of groundwater Signing of Code of Conduct (CoCs) Implementing measures to ensure smooth transitioning of project workers post-construction Conducting washout pipes to discharge water to existing

Compliance	OFI	Minor Non-Conformance	Major Non-Conformance
<p>blasting and other high noise emissions, prohibition on night working</p> <ul style="list-style-type: none"> Protection of all vegetation not required to be removed against damage Ensuring retention of topsoil for restoration (including tilling and revegetation) as soon as practicable. (See Chapter 6, Section 6.2.2 for the aspects where there are Compliances to the ESMP provisions). 	<p>traffic and warn of dangerous conditions</p> <ul style="list-style-type: none"> Ensuring adequate notice was given to the general public to enable commuters make appropriate time saving decisions Sourcing of local materials where possible to minimize transport distances. See Chapter 6, Section 6.2.2 for the aspects where there are OFIs to the ESMP provisions). 		<p>drainage system at a rate the drainage can carry to prevent flooding</p> <ul style="list-style-type: none"> Ensuring rehabilitation of blocked drainage system in Port-Harcourt metropolis to channel wastewater to receiving water bodies Ensuring water study prior to any abstraction, to inform a Sustainable Water Management Plan Providing gender-based awareness campaign within the communities See Chapter 6, Section 6.2.2 for the aspects where there are Major Non-Conformances to the ESMP provisions

RAP Implementation Compliance

- In as much as Livelihood Improvement Support was proposed in the RAP, there was no budget allocated for the actualization of these activities.
- No liaison and collaboration with other stakeholders such as Witness NGOs, State Ministry of Land, Public Complaints Commission, Ministry of Finance, and Rivers State Ministry of Environment (RSMEnv), who are also assigned responsibilities according to the RAP.
- PHWSSP has not yet carried out formal compensation for Project Affected Persons (PAPs) as outlined in the RAP prepared for the project (in other words, the project has not implemented the RAP). To date, compensation has only been provided to a limited number of PAPs (5 in total). Although very few PAPs have received compensation, payments were not made on time, as they should have been completed before the start of civil works. Additionally, key provisions of the RAP, such as PAP sensitization and capacity building, have not yet been implemented.
- Compliance was noted in the setup of the Resettlement Implementation Committee (RIC) following the completion of the first RAP in 2021. This committee included leaders from affected communities, such as Rumuogba, Rumuodumaya, Rumuomoi, Rumuola, Diobu/Rumuwoji, and Borokiri/Marine Base/Old GRA, along with other stakeholders like the project coordinator, PIU Safeguards Unit, PAP representatives, and the Resettlement Implementation Consultant. However, although the Resettlement Implementation Consultant was meant to be part of the RIC, they were not procured at that time, and the RIC has since been dissolved and is currently non-functional. Non-compliance was observed in the failure of the RIC to compile the list of PAPs, as proposed in the RAP. Currently, the project is in the process of engaging a RAP implementation consultant for the RAP implementation.
- Public disclosure for the updated 2024 RAP was carried out in accordance with the extant laws of the land on the 16th of October 2024.

ES 8: Emphatic Highlights of ESMP and RAP Implementation

<p>Capacity Building Significantly, the AfDB conducted a training on E&S safeguards for the PIU, Supervisory Consultant(s) and Contractors in July 2021, March 2022 and September 2024. It is expected that this training will enhance the technical capacity of the PIU safeguards unit in carrying out their E&S obligations of the project effectively, satisfactorily and in line with the national environmental and social regulatory framework as well as the Bank's Integrated Safeguards System (ISS). More so, it is apt to state that more and intensive training is required for the E&S unit, particularly for personnel responsible for ensuring social safeguards. The unit requires training on the Bank's Advisory Note on Preventing, Mitigating, and Responding to Sexual Exploitation, Abuse and Harassment (SEAH) within AfDB Operations (2022) to build capacity of the social/Gender Officer. It is obvious that such training will enable the safeguards unit integrate GBV-related grievances into the overall project GRM and ensure a GBV accountability system, where Focal Persons for GBV are not only seconded from the Rivers State Ministry of Women's Affairs (RSMWA) but are also part of the Supervisory Consultant and Contractors teams; so that GBV reporting and referral of GBV cases to service providers is seamless and properly coordinated. Additionally, further training on coordinating Code of Conduct (CoC) awareness and signing by the workforce is required. Notably, the fact that the safeguards unit carried out more general E&S management activities rather than conforming more with the mitigation and monitoring responsibilities proffered in the ESMP, demonstrates the need for continuous capacity building on ESMP implementation taking into cognizance that there are still other civil works to be implemented by the PHWSSP in the coming months (However, it is worthy to note that the Bank conducts capacity building on ESMP implementation monitoring during Implementation Support Missions). The safeguards unit needs to understand that ESMP implementation is a participatory function, involving a multi-stakeholder collaboration, monitoring, recording of lessons learnt and effecting new mitigation measures for potential cumulative or residual impacts.</p>	<p>Strengthening Stakeholder Engagement Stakeholder engagement under the PHWSSP requires strengthening; stakeholder engagement should be an intentional and continuous process. The Safeguards Unit should make stakeholder engagement an inclusive process, particularly in the aspects of collaborating with interested parties deemed relevant for ESMP/RAP/GRM implementation. This audit uncovered a lapse in the PIU's inability to establish and sustain effective working relations with institutions such as the RSMEnv, RIWAMA, FRSC and Rivers State Ministry of Health (RSMoH). Although intervention works are more or less completed, the ESMP still describes an operation phase which will require mitigation and monitoring of adverse E&S risks and impacts. In this regard, the project should initiate the necessary liaisons with stakeholders who may be involved in the operation phase e.g., RSMEnv, RIWAMA and the authorities of both Port Harcourt and Obio/Akpor LGAs. In as much as the E&S aspects of the project were built on the 2013 ISS, it is advisable for the project to borrow some requirements captured in OS 10: Stakeholder Engagement and Information Disclosure (2023 ISS), which are believed to add better stakeholder engagement performance to the project in future interventions. With this in view, the project may need to prepare a Stakeholder Engagement Plan (SEP) which will outline the project's framework, plan and strategy to ensuring sustained engagement of stakeholders post this ESPA, till its completion in 2026.</p>
<p>Communication, Sensitization and Awareness Sensitization and awareness campaigns serve to inform, educate, and raise awareness among a target audience about specific issues, causes, or social concerns. They are pivotal in fostering understanding and promoting engagement with development programs. The project has carried out sensitization and awareness campaigns particularly on GBV, STIs/STDs and HIV/AIDS, but there is much more communication and information sharing on project activities that needs to be received by the populace in Port Harcourt city. The project needs to adopt the use of billboards, Information, Education and Communication (IEC) materials, signposts and signages, gazettes, magazines, short adverts on social media handles (X, Facebook, Instagram, Thread, LinkedIn, etc.) to give itself a face, which residents of Port Harcourt city can associate with and in turn, appreciate the level of implementation achieved so far. In this regard, it may be suitable for the project to consider procuring a communication officer/specialist to handle communication related responsibilities. This is an opportunity for improvement considering that the project does not have a communication plan and Communication Specialist which should have set out the modalities for information sharing, collaborations with the media and the provision of periodic sensitization on project implementation status to the Port Harcourt and Obio/Akpor Local Government Offices.</p>	<p>Performance of HSE Officers in Carrying Out E&S Responsibilities for Contractors It is not clear why the project encouraged the recruitment of HSE officers to carry out E&S responsibilities on behalf of Contractors, rather than persons with qualifications in environment, social sciences, other related fields or having safeguards experience on donor funded development projects (Supervisory Consultants did well to ensure that they have core E&S officers on their teams). While it is only fair to commend the effort of HSE officers especially in implementing some aspects of Occupational Health and Safety Management Systems (OHSMSs) in the course of civil works implementation; One-on-One interviews and Focus Group Discussions (FGDs) with Contractors' HSE officers reveal that their knowledge and skills were mainly limited to basic aspects of HSE/OHS (safety toolbox meetings, enforcing use of PPEs, checking for near misses, incidents and accidents), therefore establishing a basis for their inability to provide technical guidance in ensuring Contractors' complied with certain requirements in the ESMP (e.g. development of WMPs, TMPs, LEMPs, OHSMPs, ERPs, etc.; and in the implementation of some E&S mitigation measures proffered such as signing of workers CoCs to better provide clarity on E&S staffing in Contractors' bidding documents; taking into cognizance environmental and social obligations that must be met. Furthermore, the current practice of the PIU in sharing E&S documents with only top management of the Supervisory Consultant(s) and Contractor firms, rather than with the requisite officers has proven to weaken the capacity of HSE Officers in particular, to comply with ESMP implementation satisfactorily (in other words the people who need E&S documents to work with, do not have access to them).</p>
<p>Assessment of Document Control Procedures An enormous opportunity for improvement is required in the area of document availability and accessibility, record keeping, information recovery, sharing and management of safeguards documents and associated reports specifically at the level of the Contractors. The project did not avail E&S reports for 2021 at the level of the PIU, Supervisory Consultant and Contractors. No reports were prepared for 2021 (<i>According to the PIU, the Supervisory Consultant and Contractors were procured in 2021, but full construction phase implementation kicked-in from 2022. Because of this, there are no E&S monitoring reports for 2021 since the</i></p>	<p>Sanitation and Hygiene Infrastructure Despite significant progress in water supply infrastructure, the sanitation and hygiene components are lagging behind. Key sanitation activities, including the construction of public sanitation facilities, waste management systems, and hygiene promotion, have not yet commenced:</p>

<p><i>preparation of E&S monitoring reports commenced in 2022 after civil works implementation had kicked-off. This is also the reason why the safeguards unit does not have E&S monitoring reports for the year 2021). Difficulty was experienced in promptly accessing crucial documents such as entitlement matrix for payment of compensation for PAPs from Hotel De Excellence and Assemblies of God Church, as well as Contractors E&S monitoring reports. Of primary significance, was the issue of not handing over documents from the previous/disengaged Supervisory Consultant to the currently engaged Supervisory Consultant. All actors in this regard require establishing a document management system to ease access to data, and information sharing. Even in situations where documents were available, the narration is poorly written (e.g., GRM Implementation Report), sometimes inconsistent and unclear (PIU E&S Report, in particular gender capture).</i></p>	<ul style="list-style-type: none"> • Public Sanitation Facilities: The delays to design and supervise the sanitation works has postponed construction. Addressing public sanitation, particularly in markets and public places, is crucial for improving hygiene conditions and reducing the spread of waterborne diseases. • Hygiene Promotion: Activities such as hygiene training for community leaders, teachers, and local government authorities specific to infrastructure under the project are also pending as a result of delays in construction. These activities are essential to ensure behaviour change around hygiene practices, which complement the infrastructure improvements. <p>Given the high population density in the project areas, these sanitation facilities are essential to improving hygiene standards and preventing disease outbreaks. The design of these facilities must prioritize accessibility, gender-specific needs, and sustainability. Inclusively, the project should conduct E&S screening for these sub-projects (water kiosks, public sanitation facilities, connection of households to distribution network, etc.) to determine what type of environmental and social assessment is most appropriate prior to the commencement of civil works. The civil works as well should undergo an ESPA at a preferred timeline.</p>
<p>Gap Analysis on Project's Current Actions on Gender Based Violence/Sexual Exploitation, Abuse and Harassment</p> <p>Based on the documents provided by the PIU's Social and GBV Officer (GBV action plan guide, gender mainstreaming and GBV workplan), gaps identified are as follows:</p> <ul style="list-style-type: none"> • The project's GBV action plan focuses mainly on advocacy, gender equality and social inclusion with little or no details on GBV/SEAH prevention and response • Measures to promote accountability or ensuring GBV/SEAH is prevented are not captured • Referral systems for victims/survivors are not considered nor put in place • There is absence of reporting channels for incidences of GBV/SEAH. There is no existing GBV/GRM as a standalone or linked to the project's GRM. • No existing documents on reporting and monitoring of GBV/SEAH incidences within the PIU and communities. • The roles and responsibilities of the GBV Officer captured in the documents listed above are not clearly outlined and defined for proper implementation. • GBV focal persons have been trained but have not been deployed. GBV Focal persons should be trained on best practices on survivor centred approach for handling GBV cases. It is preferable that the procurement process for Supervisory Consultants and Contractors mandates the parties to include GBV Focal persons as part of their workforce. This will make implementation of the plan and coordination of reporting channels for incidences of SEAH easier and more accountable. The current GBV focal persons are ministry staff who are not co-staff of the PHWSSP (like the Social and GBV Officer) and as such, assuring their participation and commitment to GBV responsibilities under the project is unlikely (during the audit, not one of them was seen or even part of any of the meetings). The PIU should note that the Social and GBV Officer has been seconded to the PHWSSP and not the "Focal Persons" from the ministry. It is best that the parties responsible for reporting can be easily monitored by the PIU and this will be better achieved when the Supervisory Consultant and Contractors have GBV focal persons reporting to the Safeguards Unit (as they are already contracted by the project and also have E&S obligations to comply with). The updated GBV action plan should therefore include that GBV focal persons are to be provided by Supervisory Consultants and Contractors. <p>N/B: Replicate the gender mainstreaming and GBV action plan in the staffing structure of Contractors and Supervisory Consultant.</p>	

ES 9: Assessment of the Bank's Performance in terms of Effectiveness and Quality of Assistance it has provided to the Borrower

An assessment of the Bank's performance in terms of effectiveness and quality of assistance was carried out as part of the ESPA. Recommendations to ensure E&S compliance of the PHWSSP and complementary actions required to improve the Bank's oversight functions and E&S performance of the PHWSSP have also been provided.

What the Bank is Doing to Ensure E&S Compliance on the PHWSSP	Complementary Actions to Improve Bank's Oversight Functions and E&S Performance of the PHWSSP
<p>The Bank has ensured that E&S clauses are incorporated early in project planning, particularly in Contractors' bidding documents and contracts. This ensures that Contractors can effectively implement the E&S mitigation measures outlined in the safeguard instruments (e.g., ESIA) prepared for the intervention works. The project has been diligent in incorporating E&S clauses and defining responsibilities for both Supervisory Consultant(s) and Contractors through the Bank support and oversight functions.</p> <p>The Bank is also increasing its pressure on the PHWSSP and the Rivers State Government to implement compensation of PAPs. This delay has already resulted in the situation of Rumudumaya, where the Contractor had to choose an alternative route simply because compensation has not been done for PAPs in the approved routes for layering of pipes.</p>	<p>The Bank should facilitate capacity building for the PIU on proper computation of E&S mitigation and monitoring costs in bidding documents for Contractors and Supervisory Consultants respectively. Contracts sighted for Contractors contained full ESMP costs (mitigation, monitoring, disclosure, PIU capacity building) rather than mitigation costs required for Contractors only. Furthermore, where management plans are recommended as mitigation measures, the details and cost of these management plans should be broken down in the Annexure so that Contractors understand the details to be taken care of in implementing these plans and how to disburse funds.</p> <p>The Bank needs to continue to pressure the project to implement the RAP fully. From a social accountability point of view, and taking into account GIIPs, the current practice does not give the project a good outlook, in that civil works have been completed and RAP implementation has not been carried out.</p>
<p>The Bank support has enabled the engagement of the; (i) Project Coordinator, (ii) Procurement Specialist; (iii) Sanitation and Hygiene Specialist; (iv) Environmental and Social Safeguards Expert and (iv) Institutional Development Technical Assistant. The Technical Assistants/Specialists are working side by side with water corporation staff providing on the job training and building the utility's capacity to manage the project including future expansion.</p>	<p>In particular, to E&S performance, findings from the ESPA affirm that the recruitment of the Environmental and Social Safeguards Expert is adding measurable advantage to the effectiveness and efficiency of the safeguards unit, particularly with regards to other teammates understanding the "thumb rules" in applying the requirements of the OSs and country systems to the project interventions. However, from what is seen on ground, the Bank may need to guide the project in procuring the services of a Social Safeguards Specialist to support the weaknesses in fulfilling responsibilities as seen for the Social and GBV Officer, and the GRM Officer of the PHWSSP. Furthermore, it is better that the project has a Social Officer and a separate GBV Officer. This arrangement will allow for better performance in the aspect of social safeguards compliance and in meeting the project's responsibilities to preventing SEAH.</p>
<p>The Bank has consistently urged the PIU to expedite the recruitment of consultants to carry out the activities listed below. Additionally, the Bank has advised the PIU to engage and consult with stakeholders at the State and Local Government levels to foster collaboration and secure stakeholder buy-in for the intervention works (many of which have since been completed with a poor level of stakeholder engagement).</p> <p>The activities yet to commence under Component 3 include:</p> <ul style="list-style-type: none"> (i) Knowledge, Attitudes, and Practices (KAP) Study for hygiene, sanitation, and Solid Waste Management (SWM); (ii) Development of Information, Education, and Communication (IEC) materials; (iii) Training of Trainers (e.g., teachers and community-based organizations) in hygiene and sanitation promotion; (iv) Promotion of environmental sanitation and SWM in schools and among residents to support groundwater protection and water conservation, including waste reuse; (v) Capacity building for Local Governments, State Ministries, and Agencies to manage hygiene, sanitation, and SWM activities, and to enforce environmental regulations within the city; (vi) Small-scale Public-Private Partnerships for public sanitation facilities; 	<p>It may be useful for the Bank to support the project in preparing a Stakeholder Engagement Plan (SEP) which will make stakeholder engagement more coordinated, effective, accountable, monitored, evaluated, appraised, sustainable and inclusive. The SEP will also support E&S performance especially in the areas of collaborative monitoring through better stakeholder involvement and liaison, etc.</p> <p>For development of IEC materials, the project will require procurement of a Communication Specialist as it is not doing too well in publicizing its activities, achievements and proposed works.</p> <p>Furthermore, the Bank should increase its oversight in ensuring the project develops a Sanitation and Waste Water Management Plan. This will support the project's E&S performance in areas such as promoting water conservation and ensuring sustainable water management in Port Harcourt City.</p>

What the Bank is Doing to Ensure E&S Compliance on the PHWSSP	Complementary Actions to Improve Bank's Oversight Functions and E&S Performance of the PHWSSP
(vii) Development of a Sanitation and Waste Water Management Plan.	
<p>Key E&S recommendations made by the Bank based on the August 2023 Aide Memoire</p> <p>Following the Bank support missions, the following recommendations have been made for the project to comply with:</p> <p>Expedite implementation of power substation and dedicated power line for the project through:</p> <ol style="list-style-type: none"> 1. Bid Evaluation Report (BER) review and approval 2. Start of construction works 	<p>It is imperative for the Bank to guide the PHWSSP in screening this activity so as to ascertain its eligibility for E&S assessment. If an E&S assessment is required, the Bank as expected, will provide guidance as to the most suitable E&S assessment to be prepared taking into consideration, the concept of proportionality.</p>
Obtain ESIA Certification from the FMEnv	Follow-up with the PIU on the current status of ESIA certification issuance by the FMEnv.
Prepare 2023 3 rd party annual E&S Audit covering the period 2020 - 2023	Ongoing
Ensure the CESMPs (TIEC, CGC and MotherCat) are updated and shared with the Bank	According to the PIU, CESMPs have been updated. However, the ESPA Consultant has not received nor sighted the updated versions. Importantly, CESMPs should reflect management plans in ESMPs. Besides being a primary responsibility for Supervisory Consultants to account for CESMPs preparation by Contractors; the Bank should strictly ensure the PIU safeguards unit participates fully in the review of CESMPs.
Provide evidence of compensation of PAPs (temporary loss of livelihoods to small businesses in the right of way) during the laying of water pipes.	Inasmuch as some PAPs were compensated during the pipe layering activities, evidence of compensation provided by the PIU lacks i) pictures of PAPs compensated, ii) type of structure compensated for, iii) signature of compensated PAPs. The Bank conducted an E&S training in September 2024, however, it is necessary that the Bank carries out a refresher capacity building on RAP implementation for the Social Officers and ensures that the RAP is implemented in its fullness.
Recruit an organization to provide referral services for victims of GBV/SH/SEA from the project	Bank support is required for the preparation of an updated GBV Action Plan and incorporation of a GBV-GRM into the project GRM. Furthermore, it is strongly advised that GBV Focal Persons identified to support the project in the implementation of the GBV Action Plan are part of the Contractors and Supervisory Consultants workforce. This staffing requirements should be included in the bidding documents; and the safeguards unit must be represented during bid evaluation to check and provide quality assurance in the aspect of Contractors and Supervisory Consultants including GBV Focal Persons as part of their key or non-key staff. Likewise, they should also have E&S Focal Persons to support E&S compliance and not HSE Officers who by virtue of their training, will be more biased to only HSE compliance. See Figure 18 below for proposed organogram for E&S implementation and reporting.
Ensure all workers including casual workers have contracts complying with the national requirements (working hours, wages and benefits, rest periods, overtime arrangements, leave entitlement for illness and maternity/paternity, and grievance mechanisms)	The Bank should adopt a major requirement of the new OS 2 (Labour and Working Conditions) to support the application of OS 5 (Labour Conditions, Health and Safety) which is currently relevant to the project based on the old 2013 ISS on which the projects safeguards foundations are based. The requirement in particular is the preparation of an LMP; which will largely solve the current problems in labour and working conditions observed in the project from 2021 – 2024.
Provide the investigation report of all the 4 incidents that occurred at TIEC and CGC sites in May 2023 in the revised June 2023 E&S report	If the Bank has its own accident investigation and reporting framework or tool kit, it is recommended that the PIU is trained on it, likewise Supervisory Consultants and Contractors, so that there is uniformity in the preparation of accident/incidence reports. Moreover, the reports should include an RCA and a set of corrective actions to the minimum.

ES 10: Corrective Actions

Some corrective actions proffered to PHWSSP to address weaknesses in overall E&S performance and compliance include:

- Establish a mandatory joint review (cross-functional) between the Safeguards Unit and Procurement Office to verify ESMP mitigation costs before finalizing Contractors' BOQ for future interventions.
- Conduct refresher training sessions for both units (i.e., Safeguards and Procurement Units) on ESMP cost allocation requirements to ensure accurate budgeting/computing.
- Establish a comprehensive training program for Supervisory Consultants, Contractors, and PIU Safeguards Unit on ESMP implementation, with a focus on mitigation, monitoring, reporting, and compliance.
- Develop Standard Operating Procedures (SOPs) for undertaking E&S monitoring responsibilities. The SOPs shall emphasize procedures for regular, structured field visits to assess compliance with ESMP mitigation measures.
- Prepare an ESMP monitoring checklist, which shall be reviewed and updated to be in alignment with ESMP requirements for sub-projects. This checklist shall be used for E&S monitoring in future intervention activities.
- Prepare monthly ESMP mitigation and monitoring reports that are specific to the ESMP. These reports should clearly demonstrate compliance with the mitigation measures and monitoring responsibilities outlined in the ESMP matrix table.
- Develop and implement a Stakeholder Engagement Plan (SEP).
- Liaise and establish structured and regular meetings with MDAs and project stakeholders to align E&S monitoring roles assigned in safeguards instruments prepared for the project.
- Conduct a comprehensive review and update of the RAP in accordance with the loan agreement requirements and current market rates (i.e., November 2024). Ensure all identified PAPs are compensated or resettled prior to any further civil works.
- Establish and sensitize/communicate a clear RAP implementation and compensation timeline to all PAPs, including stakeholders.
- Develop and implement a Livelihood Restoration Program (LRP) to support PAPs in regaining or enhancing their pre-project income levels.
- Implement a standardized E&S monitoring and reporting framework for Safeguards Unit, Supervisory Consultants, and Contractors.
- Develop a unified monitoring checklist and documentation template, ensuring all relevant E&S parameters are covered (e.g., noise, waste, social impacts) according to the ESMP.
- Establish a central electronic documentation system (accessible to all E&S teams) for serially tracking all reports and E&S monitoring data across years.
- Implement a centralized, cloud-based Document Management System (DMS) and platforms (such as Google Cloud, Microsoft SharePoint, good intranets—e.g., Guru, Workvivo, Bitrix24, etc.) to standardize and control document handling, sharing, and access permissions.
- Train all relevant staff on DMS usage and establish routine audits to ensure compliance.
- Review and finalize the draft GRM with input from relevant stakeholders, ensuring it covers all grievances (including GBV-GRM) and align with the AfDB's SEAH redressal requirements.
- Implement procedures and actions set out in the Final GRM Report in the current and future interventions.
- Conduct training and sensitization workshops for project personnel, PIU Staff, Contractors, and community representatives on GRM usage and access.
- Adequate documentation of grievances logged on a daily, weekly and monthly basis in a dedicated grievance logbook.
- Follow through with redressal and feedback in a timely manner.

Implementation Schedule

The activities related to achieving implementation of the action plan captured in this ESPA report have to be integrated in the overall implementation schedule. The implementation of corrective actions will be completed over a three (3) months period. The implementation schedule is presented in Table below.

Schedule for the Implementation of Corrective Actions

S/N	Activity Description	Responsibility	APRIL 2025				MAY 2025				JUNE 2025				JULY 2025	
			1	2	3	4	5	6	7	8	9	10	11	12	13	14
1	Capacity Building on Environmental and Social Safeguard Monitoring	Bank/PIU.														
2	Coordination for collaboration with MDAs	PIU, Safeguards Unit.														
3.	RAP Implementation and Livelihood Restoration.	PIU, RAP Consultant, RIC, NGOs, etc.														
4.	Procurement of Firm for Asbestos Waste Management and Implementation of requisite activities under the AWMP	PIU, Waste Management Firm														
5	Procurement of Consultancy Services for Update of Project GRM, GBV Action Plan, SEP, LMP, Communication Plan.	PIU and procured Consultant														
6	Training on GRM, GBV and Accidents/Incidents Reporting	Bank and PIU														
7	Implementation of other corrective actions	PIU														
8	Submission of progress reports for implementation of corrective actions	PIU					1 st PR				2 nd PR				3 rd PR	

ES 11: Action Plan Estimated Implementation Budget

Estimated Implementation Budget

The total estimated cost for implementation of the action plan is One Hundred and Thirty-One Thousand, Three Hundred and Eighteen US Dollars Only (**USD 131,318**). This is equivalent to Two Hundred and Fifteen Million, Two Hundred and Thirty-Six Thousand and Seven Hundred Naira Only (**NGN 215,236,700**). See Table below.

Estimated Implementation Budget

S/N	Corrective Actions for	Responsibility	Estimated Cost (USD)	Estimated Cost (NGN)
1.	ESMP Implementation	PHWSSP PIU; Safeguards Unit, Contractors, Procurement Unit Office, Independent Consultant, Federal Ministry of Environment (FMEEnv) Accredited Laboratory, Independent Contractor—Rivers State Ministry of Environment/Rivers State Waste Management Agency(RSMEnv/RIWAMA) Licensed Waste Vendor, Supervisory Consultants, Contractors,	88,617	145,228,947
2	RAP Implementation	PIU Safeguards Unit, Resettlement Implementation Committee (RIC), RAP Implementation Consultant; None Governmental Organization (NGOs), Local Leaders, Independent Consultant, MDAs (FMEEnv, National Environmental Standards and Regulatory Enforcement Agency [NESREA], RIWAMA, Rivers State Ministry of Women Affairs [RSMWA])	N/A	N/A
3.	Stakeholder's Engagement and Collaboration	PIU, Safeguards Unit, Independent Consultant, MDAs (FMEEnv, NESREA, RIWAMA, RSMWA, etc.)	10,000	16,437,789.6

S/N	Corrective Actions for	Responsibility	Estimated Cost (USD)	Estimated Cost (NGN)
4.	Reporting, Document Management and Information Sharing	PIU Safeguards Unit, Supervisory, Consultant and Contractors, PIU Management Information System {MIS} Department, PIU; Independent Occupational Health and Safety {OHS} Consultant	1,222	2,001,282
5.	GRM Implementation	AfDB E&S Compliance Team PIU; Safeguards Unit, Social/Gender Based Violence {GBV} Officer, GRM Officer.	2,748	4,500,427
6.	C-ESMP Preparation and Implementation	PIU Safeguards Unit; Supervisory Consultant; Contractors	N/A	N/A
7.	Staffing Gaps/Deficiencies	PIU Safeguards Unit; Supervisory Consultant; Contractors, PIU Management	N/A	N/A
8.	Site-Specific Findings (Emergency Response Planning and Housekeeping)	PHWSSP PIU, Safeguards Unit, PHWC Management and Staff, Supervisory Consultant, Contractor.	1,527	2,500,000
9.	GBV Action Plan Review	AfDB E&S Team PIU; Independent GBV Consultant; Safeguards Unit.	15,266	25,001,281
10.	Contingency	10% of Corrective action Implementation cost.	11, 938	19,566,972.7
	TOTAL		131,318	215,236,700

Estimates are based on the CBN USD to Naira rates for the Month of November, 2024 (i.e., 1 USD = NGN1,637.71)

ES 12: Stakeholder Engagement

The rationale for stakeholder engagement (PAPs, GRCs, Resettlement Committees, Contractors, etc.) was based on the need to verify claims for which documentation was unavailable and to also access the general perception of sub-project performance in the respective benefiting communities. Since some E&S performance aspects such as labour influx (which could result in VAC, conflicts with communities, etc.), grievances due to lack of RAP implementation, could not be verified, considering that sub-projects were mostly completed; responses from stakeholders in communities proved to be a useful performance indicator.

Excerpts of Key Consultation Comments, Concerns and Suggestions from PAPs

Comments/Concerns	Responses by Stakeholders	Suggestions/Remarks	Responses by Stakeholders/Consultants
PAPs			
<ul style="list-style-type: none"> The Consultant inquired about what the "Hotel de Excellence" was compensated for and how the issue was raised to the project. The Consultant asked a follow-up question to determine if the compensation made to the hotel was provided in full, what method was used for the payment, and the timeline for when the payment was made. The Consultant inquired whether the compensation 	<ul style="list-style-type: none"> The Manager of Hotel de Excellence explained that the hotel was compensated for the disruption to its business operations caused by the excavation work on Timothy Lane in Rumuola. He stated that on December 6, 2022, a letter was sent to the PHWC requesting compensation to the amount of 500,000 naira. He further confirmed that the full amount was compensated through a bank transfer, which was made towards the end of December 2022. The manager affirmed that the compensation was 	<ul style="list-style-type: none"> Inasmuch as the project is yet to implement its RAP formally, it was proper that they compensated the hotel, even though compensation should have been done prior to the commencement of civil works. Importantly, some communities and areas in Port Harcourt and Obio-Akpor have in the recent past, been violent and destructive, especially where Contractors or strangers are carrying out similar intervention 	

Comments/Concerns	Responses by Stakeholders	Suggestions/Remarks	Responses by Stakeholders/Consultants
was adequate to cover the economic losses incurred by the hotel due to restricted access to its premises during the Contractor's pipe-laying activities that traversed the hotel entrance.	adequate. He elaborated that a comprehensive evaluation was conducted, taking into account several key factors, including i) average number of guests the hotel received daily, ii) the total number of days the hotel would be closed due to the civil works, and iii) the average lodging costs per room. He further stated that it was on this basis that they calculated the compensation amount, and they believe it was sufficient.	works. With this historical background, it is good that the PIU addressed the issue of compensation, so as not to escalate any uncertainties.	
Contractors			
<ul style="list-style-type: none"> The Consultant inquired to know if the Contractors have E&S officers on their teams for managing E&S issues that arise before and during intervention works. The Consultant inquired about the number of Contractors engaged by the Project. The Consultant requested to know the Packages and Lots each Contractor was assigned and the percentage of completion for each intervention works. The Consultant inquired to know if Contractors prepared monthly E&S reports 	<ul style="list-style-type: none"> Each Contractor stated that they have HSE officers on their teams who have undergone health and safety training. They stated that these officers are responsible for managing any E&S issues that arise throughout the project implementation. It was clarified that three (3) Contractors have been engaged since the inception of the project to date for the implementation of the intervention works. It was clarified that one Contractor was responsible for intervention works in Rumuola I (WP-1, Lot 1), Rumuola II (WP-1, Lot 2), Borokiri (WP-2, Lot 2), and Diobu (WP-2, Lot 3). A second contractor handled Rumuola III (WP-1, Lot 3), while a third contractor was assigned to Moscow (WP-2, Lot 1). Additionally, at the time of the audit, it was stated that civil works have been completed in all locations, except for Moscow Road, which is nearing completion. However, currently, they have been completed. The Contractors stated that they do not prepare monthly E&S reports as standalone documents. Instead, they 	<ul style="list-style-type: none"> The Consultant emphasized the importance of engaging qualified E&S officers for future projects. While acknowledging that the HSE officers are well-trained in health and safety, he noted that having dedicated E&S officers on the team would significantly improve the management of E&S issues and concerns. 	<ul style="list-style-type: none"> The Contractors expressed their gratitude to the Consultant for the suggestion and affirmed their commitment to adhering to these recommendations in future projects.

Comments/Concerns	Responses by Stakeholders	Suggestions/Remarks	Responses by Stakeholders/Consultants
<ul style="list-style-type: none"> The Consultant requested the monthly progress reports prepared by each Contractor from 2021 till present. The Consultant inquired about the gender distribution among the Contractor's workers during the civil works. The Consultant inquired about the grievance logs maintained by the Contractors during the intervention works. 	<p>include Environmental and Social matters within their monthly progress reports, where HSE issues are addressed as part of the overall project updates.</p> <ul style="list-style-type: none"> The Contractors indicated that the monthly progress reports from 2021 to 2024 are currently held by the PIU. They advised the Consultant to request these reports directly from the PIU. Alternatively, they stated that if granted permission by the PIU, the Contractors can facilitate access to the documents for the Consultant. The Contractors responded, stating that, on average, 95% of the workers were male, while 5% were female, engaged in the intervention works. The Contractors responded that grievances were addressed on-site, and therefore, no formal grievance logs were kept. 		