

ENVIRONMENTAL AND SOCIAL SAFEGUARDS AUDIT



FMARD
FEDERAL MINISTRY OF AGRICULTURE
AND RURAL DEVELOPMENT



Access for Sustainable Development

FEDERAL GOVERNMENT OF NIGERIA

SECOND RURAL ACCESS AND MOBILITY
PROJECT **(RAMP 2)**

Environmental and Social Safeguards Audit

Final Report

March 2021

EXECUTIVE SUMMARY

ES 1: Background

The Federal Government of Nigeria through the Federal Ministry of Agriculture and Rural Development (FMARD) received financing from the World Bank (WB) and French Development Agency (AFD) for the implementation of the Second Rural Access Mobility Project (RAMP 2) currently in Adamawa, Enugu, Imo, Niger and Osun States. The RAMP 2 is in line with achieving the Federal Government's Rural Travel and Transport Program (RTTP), which is aimed at improving and enhancing accessibility and mobility in the rural areas. The rural populace suffers a lot from the absence of, or poor conditions of roads, river crossings and drainages. The absence of, or the poor conditions of these facilities hinder the rural populace from easy transportation, access and conveyance of their commodities and agricultural inputs and outputs. Phase 1 sub-projects for Adamawa State were for the rehabilitation of proposed 201.4km roads, while in Enugu State (169.4km), Osun State (224.62km) and Niger State (176.7km). The proposed rehabilitation works involved layering of roads with laterite, construction of hydraulic structures, and construction of line drains. However, after subsequent engineering reviews, the road lengths were reduced to 169.4km for Adamawa, 115.315km for Enugu, 214.14km for Osun and 175.74km for Niger state. Phase 1 sub-projects were implemented from 2015-2019. RAMP2 also commenced Phase 2 of its implementation from 2019-2020. Phase 2 subproject activities for Adamawa State were for the rehabilitation of 242.7km roads, while in Enugu state was 270.059km, Osun state 307.9km and Niger state 403.54km. The proposed rehabilitation works are similar to those of Phase 1.

Another range of sub-projects were also implemented within the timeframe of the Phase 1 road implementation. These include Access/Spot Improvements to River Crossings. In Adamawa, these Access/Spot Improvements were carried out on a stretch of 65km rural roads leading to River Crossings previously constructed by the Adamawa RAMP2. Likewise, Spot Improvements to River Crossings were also implemented in Enugu State (38.665km), Osun state (37.54km) and Niger state (119km). Prior to the commencement of civil works for the sub-projects, several safeguard instruments [(Environmental and Social Impact Assessments – ESIs (3); Environmental and Social Management Plans – ESMPs (9); Resettlement Action Plans – RAPs (2); Abbreviated Resettlement Action Plans – ARAPs(9)] were prepared with management plans detailing institutional responsibilities to ensure satisfactory environmental and social performance of the sub-project during the pre-construction, construction and operation phases. The sub-projects were completed between 2015-2020, and the need to appraise the overall environmental and social performance of the RAMP 2 is essential. Consequently, the Federal Project Management Unit (FPMU) for RAMP 2 has embarked on the preparation of an Environmental and Social safeguards Audit for the Phase 1 sub-projects implemented by the Adamawa, Enugu, Niger and Osun RAMP 2 State Project Implementation Units (SPIUs).

ES 2: Inventory of Sub-projects and Aligning Safeguard Instruments Prepared

Sub-projects implemented by the respective SPIUs during Phase 1 and Phase 2 implementation were organized in "Lots". The inventory for Phase 1 and Phase 2 sub-projects are presented below, alongside the aligning safeguard instruments prepared prior to commencement of civil works. While the disclosure status for each instrument is presented in table 43 and 44.

PHASE 1

STATE: ADAMAWA STATE					
Sub-Project		Length (KM)	Safeguard Instrument	In-Country Disclosure Date	Bank Disclosure Date
LOT 1	Jambutu-Boggare	8.2	ESMP -1	September 2014	10 th November, 2015
	Njoboli-Njoboliyo Rugange	9.4			
	Kwanawaya- Namtari Manga	4.2	ARAP -1	September 2014	NIL

FINAL REPORT

	Labando-Gwakrah-Koh-Goron-Borrong	34.6	ARAP - 1	May 2015	NIL	
LOT 2	Bazza-Bestomango-Kalikasa-Kasudazah	25.0				
	Shuwa-Kwambula I-Kwambula II	8.1	ARAP – 1	May 2018	NIL	
	Koe-Koppa	8.0				
LOT 3	New Demsa-Kodomun-Kwaine	28.0				
	Kpasham-Kebali-Yanga	15.2				
	Bille -Gumari-M/Belwa	15.5				
	Gyawana-Lamurde	12.8				
TOTAL		169				
STATE: ENUGU STATE						
Sub-Project		Length (KM)	Safeguard Instrument			
LOT 1	Abor Road	3.76	ESIA -1	NIL November 2017	NIL	
	Egede – Awhum Road	6.5	ESMP -1		NIL	
	St. Mary Ngwo – Nsude Road	6.25				
	Ugwuoba – Nkwere Inyi-Inyi Road	19.88				
LOT 2	UNTH – Enuguagu Ndiagu-Umuaniagu–Obe – Amuri Road	11.88	ARAP -1	November 2017	NIL	
LOT 3	Neke – Mbu – Ogbodo Aba – Obollo Eke Road	25.38	RAP -1		December 2018	NIL
LOT 4	Ukpabi – Nimbo – Ugbene Ajima – Eziani Road	26.275				
	Ikwoka –Amagu – Ajuona – Akabusiyi – Obimo Road	5.45				
	Adani – Asaba – Igga – Ojo	9.94				
TOTAL		115.315				
STATE: NIGER STATE						
Sub-Project		Length (KM)	Safeguard Instrument			
LOT 1	Mokwa-Ja’agi-Kudu	45.24	ESMP -1	September 2014	10 th November 2015	
	Wuya Suman-Lemu	36.93				
LOT 2	Sullu Junction-Tafa	6.6	ARAP -1	November 2012	10 th November, 2015	
	Sabon-Wuse –Ijagbayi	8.37				
	Suleja-Abuchi-Izom	21.0				
LOT 3	Wawa-Malale	21.0				
	Auna-Tunganjika-Shanfini	36.6				
TOTAL		175.74				
STATE: OSUN STATE						
Sub-Project		Length (KM)	Safeguard Instrument			
LOT 1	Agbowu/Ogbaagba – Idirioko – Eleru – Bode Osi	13.74	ESMP -1	November 2015	November 2015	
	Bode – Osi Township Asa Junction (DBST)	1.4	ARAP -1	November 2015	November 2015	
	Asa – Dagbolu – Ajagunalaase (DBST)	3.2				
	Eeleke –Kanko (Ile – Ogbo Eeleke kanku and Telemu)	3.91				
	Agoro – Ikonifin	11.1				
	Ikonifin – Sade – Ajagunlaase	12.9				

FINAL REPORT

	Akinleye –Aba Ayo – Isero	5.3			
	Pataara – Ileko – Oba – Odo – Omi – Farm Settlement Road 1	4.33			
	Farm Settlement Spur	1.4			
LOT 2	Jagun Osi/ Onikoko – Osi Sooko	10.5			
	Osi- Sooko – Osi Ara/Ara – Joshua	9.5			
	Ara Joshua – Falala (Yinmi Oja)	9.3			
	Alogba (Gbengbeleku Junction) – Owode Amu	10.9			
	Owode – Amu – Oyere Fadehan	18.2			
LOT 3	Shasha Road (Lawoka Junction – Apoje Junction)	39.164			
	Spur (Elewaa, Ife tuntun, Owena)	10.00			
LOT 4	Ilesa – Odogbo – Araromi – Igbowiji	8.73			
	Ilesa – Ilo Olomo Boundary (DBST)	3			
	Ira – Ikeji – Arakeji	8.0			
	Ira Township (DBST)	0.8			
	Aikulola – Ilesa Express (DBST)	1.35			
	Araromi – Alagbe Junction	2.64			
	Ibete junction – Orisunbanre	1.15			
	Ira (Court Jct) – Araromi	3.49			
	Isale General Hospital Township– Muroko – Oke – Bode	10.55			
	Isale General Hospital Township (DBST)	1			
	Odogbo – Iwara	6.58			
TOTAL		214.144			

The full titles of the instruments prepared is provided in Chapter 5 of this report.

Note that the total road length provided in the table above is the representation of the actual road length of the roads rehabilitated and constructed by the respective SPIUs (Phase 1).

PHASE 2

STATE: ADAMAWA STATE (PHASE 2)					
Sub-Project		Length (KM)	Safeguard Instrument	In-Country Disclosure Date	Bank Disclosure Date
LOT 1	Kola Junction – Boshiri	17.31	ARAP	25 th September 2019	27 th November, 2019.
	Shelleng – Bakta	16.93			
	Numan/Biu road- Barre	7.42			
LOT 2	Daba – Mayo Belwa	16.70		25 th September 2019	27 th November, 2019.
	Polewire- Ndikong	13.14			
	Ngurore Mayo Belwa road- Ngongoshi	9.38			
LOT 3	Longa Ewa - w/Abbo- W/ Yombe	16.71			
	Toungo – Kirri	11.47			
LOT 4	Yolde Pate prison – Yadim	27.91			
	Gurin – Filingo	21.15			
	Parda -Muninga	18.09			

FINAL REPORT

LOT 6	Konan Yaji- Mijiwana- Gilanbara- Amdur	15.58			
	Hong - Mijili- Kuva Gaya	25.54			
	Wuro bokki- Uding – Pella	6.10			
LOT 7	Ribawo Junction – Muchalla	6.09			
	Mayo Gule- Manjecken – Salma	10.90			
TOTAL		242.7Km			
STATE: ENUGU STATE					
Sub-Project		Length (KM)	Safeguard Instrument		
LOT 1	Nkpologu-Uvuru-Ukpata-Adaba-AkunyiUmulokpa Road	39.221	ESIA	March 2020	30 th April 2020
	Odenigbo-Edem Ani-UgwuiyiMpi- OfuluOnu Road with Spurs to Imilike-Ubogidi Road and Catholic Parish Road	11.562	RAP	March 2020	Nil
	Nguru-Akpoto- St Mary Obimo	9.100	RAP	August 2020	Nil
LOT 2	EnyazuruOhomorba Rd	16.70	RAP		
	Umu-Ezejor-Agu-Udele-Itabor Road with Spur at Ubahor	13.14			
	OgboUmuokere-Mbanato-ImufuUmundu-Obegulgugu-Nkporogwu- Ngbede-NkwoUmunduOhullor Road	6.110			
	ObolloOgbelle-Ezimo Road with Spur to AMA-Ogbelle UNO	6.138			
	Express- Odobodo- Amalla-OkpuOrba Rd.	2.410			
	OnuaffaAmallaOrba - Amaedem-Ofuluonu - Agudele Road	3.260			
	Igogoro-Amachalla-Ikpogga-UmuagbedoAgu	9.680			
	Amufie-Ugbaike-InyiObollo Road	7.640			
	Onichadugo-Olido-Amube	6.600			
	Aku-Udueme Road	9.200			
LOT 3	Umudinwogo-Amabokwu-Useh (with Spur to UwaniAmabokwu Road)	1.500			
	UwaniOtobo-Ugwunani Oshigo-Oda Aku (with spur obie-Ugwunani-Abokwe-Umudiukwu Road)	2.944			
	AcharaOhodo through Achara Primary School to old primary school ohodo to union primary school ohodo to Lejja	9.701			
	Ohodo Express Road Junction Through St Thomas Catholic Church + Ohodo Through Central Primary School Ohodo To Central School + Ozalla Through IjoOzalla To AmaEzikeOhemjeAku	10.940			
	Ohebedim - Ozalla - Lejja Road	10.100			
LOT 4	Uhuogiri-Railway Road	3.100			
	Ogbaku-Ogugu-Owelle-Ihe Road (From Ogbaku Town)	8.580			
	Obeagu - Uguwaji with Spur to Uzamdunu Road	7.680			
	UmuajiAguobuOwa-UmuajiMgbagbuowaAgbaUmuna - Ebenebe Road (with Spur to AugobuOzom through T-Junction, Umuaji)	12.560			

FINAL REPORT

		AbonuzuOwa - Ajali Water Works	4.640			
		MTN Exp Junction-Umueze-Aguawu Farm Settlement Road-Spur to Okposi	5.657			
LOT 5		Eha Uno-EhaNdiagu	16.940			
		Owere-Umuabor-EdemUmabor-Aguudene-Mbu	23.600			
		ObiaguOhomOrba Rd - AmubeOhomOrba Rd.	0.880			
LOT 5		Ohebe-AguOrba-Agulmilike Farm Road + ImilikeEtiti-Ezimo Road	19.766			
		Neke - Umualor - Ehamufu Railway Line Road	15.400			
TOTAL			270.059km			
STATE: NIGER STATE						
Sub-Project			Length (KM)	Safeguard Instrument		
Pkg 1	Lot 1	Lunma – Shaganu Road	26.92	ESMP -1	October 2019	27 th November, 2019
		Fellegi – Shafini Road	12.17			
	Lot 2	Bangi – Kompanin Bobi	88.70	ARAP -1	August 2018	Nil
Pkg 2	Lot 1	Sullu Junction – Daku Bridge – Sabon Diko	4.62			
		Sullu Junction – Kabo	10.61			
		Old Gawu - Farindoki	21.97			
		Kuta – Kobwa - Kafa Layi Road	25.84			
	Lot 2	Wushishi – Makusidi – Bida Junction	22.85			
		Pandogari - Bassa	54.75			
Pkg 3	Lot 1	Kutigi – Dasun – Tashan – Hajija Road	55.32			
	Lot 2	Doko – Gaba – Sheshi	14.43			
		Patbokungi – Jebo – Angasa	12.02			
	Lot 3	Wuyakantin-Etsu Tasha - Kpatagi	22.65			
		Badeggi – Ebba – Kataeregi	42.14			
TOTAL			403.54Km			
STATE: OSUN STATE						
Sub-Project			Length (KM)	Safeguard Instrument		
Pkg 1	Lot 1	Oshiri – Agbonda – Kuta	10.16	ESMP -1	December 2018	25 th July, 2018
		Idi Iroko – Onigangan	15.15			
		Wakajaye Ogbaaga – Benbe	9.3			
		Odeyinka Womonile Oyere Fadehan	7.47			
	Lot 2	Idi Iroko Apomu – Igi Sidi – Idi Agbon Sunbare Oloyin	32.85	ARAP -1	July 2018	Nil
		Molarere Junction	20.07			
	Lot 3	Obajoko Market – Asipa, Foritaje – Lanite – Loogun – Agberire	13.15	ARAP -1	Nil	16 th July, 2020
		Aba Elewa – Isimosita – Odo – Oba	6.37			
		Idi Araba Agberire Market	17.49			
Pkg2	Lot 1	Trade Fair – Aduramigba - Okinni	4.74			
		Ara Obada Ayetoro (OYSB)	5.32			
		Bara Yemope	12.9			
		Olla – Isoko – Masifa	4.72			

FINAL REPORT

		Songbe – Inisa – Edo	8.82			
		Isundurin – Iwo Oke	5.99			
	Lot 2	Oke Onitea – Modogbo – Oba Oke with Spur to Housing	11.3			
		Eko Ende – Oko Oluawo Olowobori	10.47			
		Ekutu Owode – Adara (Ilie)	6.8			
		Ifon – Okiti – Idi Iya with Ibigbami	17.83			
	Lot 3	Igbajo – Edemosi with Spur to Iresi	14.11			
		Ila Farm Settlement	8.04			
		Methodist High Sch (Aagbaa) – Oore – Ibontoro	14.38			
		Elesun Junction – Idi Ogede – Aba Aro – Egbeda	5.69			
		Elesun Road – Oja Ayepe	1.43			
	Lot 4	Isolo – Ilorigbon – Oja Ejoro – Isa Obi – Eruru Junction	10.18			
		Ijaregbe – Eesun – Ilesha / Ijebu Jesa Road	8.92			
		Leventis Farm Road Network	3.32			
		Akoda Ayetoro – Baale Wajeko – Ilesha / Akure Expressway	20.99			
TOTAL		307.9Km				

The full titles of the instruments prepared is provided in Chapter 5 of this report.

River Crossings/Access to River Crossings/Spot Improvement/Works Emanating

ADAMAWA STATE (ACCESS TO RIVER CROSSINGS)								
Sub-Project		Length (km)	Safeguard Instrument	In-Country Disclosure Date	Bank Disclosure Date			
LOT 1	Main Road to Kenye River Crossing	0.124	ESMP - 1	25 th September 2019	27 th November 2019			
	Mbuliriga to Wuro Hausa River Crossing	11.019						
LOT 2	Hombo to Dumne Bridge River Crossing	7.841						
	Main Road to Bolki River Crossing	0.841						
	Main Road (Shuwa Kala'a) to Dilwachira River Crossing	7.760						
	Kuva Gaya to Kwalitta River Crossing	4.5						
LOT 3	Guyuk to Dukkul River Crossing	5.090						
	Shelleng to Katamberi River Crossing	0.900						
	Main road to Shima River Crossing	1.240						
LOT 4	Ribadu to Diyam Dadi River Crossing	8.8						
	District Head junction to Jada River Crossing	0.635						
	Fufore Gurin road to Beti River Crossing	5.0						
LOT 5	Toungo District head Junction to Yerima River Crossing	1.2						
	Ganye to Buwangal River Crossing	1.5						
	Sansiri to Sambang River Crossing	8.4						
	Mayo Gule- Manjeken - Salma	10.90						
TOTAL		65						
ENUGU STATE (ACCESS TO RIVER CROSSINGS)								

FINAL REPORT

Sub-Project		Length (km)	Safeguard Instrument	In-Country Disclosure Date	Bank Disclosure Date			
LOT 1	Ekwegbe Agu (Obaro Stream)	0.700	NO SAFEGUARD INSTRUMENT WAS PREPARED FOR ACCESS TO RIVER CROSSINGS IN ENUGU STATE					
	Nkwo Opi	0.700						
	Obollo Etiti (Oshenyi)	1.780						
	Umuigide (Ebonyi)	2.550						
	Ugwuanama Mbuamon	1.750						
	Umuigide (Ogba)	1.800						
LOT 2	Mpu – Ovia Oduma	1.500						
	Amacharauka – Oduma Community	1.800						
	Oke Ali River	2.800						
	Amiga Umuemem (Obese Stream)	2.500						
LOT 3	Mbu Amonu – Ojo - Ochoro	1.100						
	Ebor Ogomgo (Ebonyi Stream)	0.900						
LOT 4	Iza Akpoga – Mbulu Owo (Owuyi Stream)	1.925						
	Ihuona Ugbakwa – Amuri (Unungeneoyi Stream)	2.260						
	Atavu River	2.500						
LOT 5	Orie Engine (Ngene Egbede Stream)	2.500						
	Ezi – Ejike – Anochiard - Ugwuoba	0.600						
	Efulu – Aguaboshi – Nkwere – Akugoezi Agwu (Ogid)	1.000						
	LOT 6	Adani River				3.500		
Agu - Ukehe		4.500						
TOTAL		38.665km						
NIGER STATE (ACCESS TO RIVER CROSSINGS)								
Sub-Project		Length (km)				Safeguard Instrument	In-Country Disclosure Date	Bank Disclosure Date
	Kaboji – Adogon Mallama	19.0				ESMP - 1	6 th July, 2020	Nil
	Adogon Mallam - Mazakuka	11.6						
	Kutriko – Eyangi - Liman	16.584						
	Takuti - Kutriko	12.874						
	Shakwatu - Gunudna	2.585						
	Ibeto - Gyengi	0.792						
	Maikujere - Madaki	3.075						
	Makera – Beji – Labuda	15.95						
	Mukugi - Adako	7.412						
	Sarkin Pawa – Iga	5.595						
	Kontagora – Gangaren Sagi	2.87						
	Gbadafu – Emighimanzhi	3.146						
	Daban - Ndaruka	5.0						
	Lambata – Nyela – Baji	7.0						
	Napankuchi	2.607						
	Maikunkele - Jangaru	6.9						
TOTAL		119						
OSUN STATE (ACCESS TO RIVER CROSSINGS)								
Sub-Project		Length (km)	Safeguard Instrument	In-Country Disclosure Date	Bank Disclosure Date			
	Fidiwo – Funmilayo - Olubooku	5km	NO SAFEGUARD INSTRUMENT WAS PREPARED FOR ACCESS TO RIVER CROSSINGS IN OSUN STATE					
	A. Elewonta – Ayelaade – Oluponna DStation T Junction	5km						
	B. Additional Works	3km						
	A. Iresi – Oparinde (Ila)	8.54km						
	B. Culvert Extension							
	Araromi – Owode - Elere	3km						
	A. Sekona – Arola	13km						
	B. Uniosun Gate – Coker - Aajo							
	Ire Poly Daily Campus Rd 1, Rd 2, Rd 3							
	Olukesi Farm, Ojueri, Iresi							

FINAL REPORT

Ipon Stream, Oyan	
Agbalejere Road (Oyan Town)	
Odo Owere (Owode Ede)	
Gbalefefe Road (Modakeke)	
Oke Aho Stream (Sekona town)	
Faweri River Ogudu (Ogudu)	
Ogbagba, Ogudu	
Oagbaja Apoti Road 1 & 2 (via Bankemo)	
Odo Oroki Otan Ile – 1 Ipetu Ile Road 1 (Otan Ile)	
Odo Oroki Otan Ile Igbajo Road (Otan Ile)	
Osejere River Along Promise land (Osogbo, Kelebe)	
Powerline River Along Oke Odo (Osogbo Powerline)	
TOTAL	89.5km

ES 3: Audit Methodology

The methodology or technical approach adopted for this safeguards audit is a stepwise process involving i) Strategic Planning, Activity Scheduling and Logistics Arrangement with the FPMU and subsequently, SPIUs, ii) Stakeholder identification to ascertain what group of persons or individuals require to be consulted for the purpose of the audit iii) Inventory of Sub-projects and Documents Collections (Safeguard Instruments and other relevant documents), iv) Documents Review – precisely management plans for Preparation of SPIU-specific Audit Checklists to address compliance to Specified Safeguards Instruments v) Use of Scoring Criteria to evaluate compliance vi) Field Visits, vii) Sampling of Project Affected Persons (PAPs) compensated or displaced under the project for the purpose of assessing the resettlement program, Grievance redress under this program as well as the impacts from livelihood restoration or enhancement and viii) Gaps Identification, recommendation of Corrective Actions and Preparation of an Action Plan. Details on the work methodology for the Audit are provided in Chapter 4 of this Safeguards Audit Report.

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

- Compliance to provisions in safeguard instruments and activities that address triggered safeguard policies under RAMP 2
- Compliance to Nigerian Environmental and Social legislation including the EIA Act.
- Compliance to the WB Operational Safeguards Policies
- Compliance to environmental and social management and monitoring responsibilities
- Compliance to World Bank's Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works and Guidance Note on Labour Influx

ES 4: Audit Checklist

Checklists for each SPIU, specific to the safeguard instruments prepared for their respective sub-projects were used.

Scoring Criteria

In view of the above, the scoring criteria or rating system for the Checklists is stratified from 'compliance' to 'major non-conformance' to convey a concise and consistent method for scoring each audit finding.

FINAL REPORT

ES 5: Description of the Key Environmental and Social Audit Findings

Assessment of Mitigation and Monitoring Responsibilities for ESMP Implementation

Assessment of Mitigation and Monitoring Responsibilities (Phase 1)	Assessment of Mitigation and Monitoring Responsibilities (Phase 2)
<p>Adamawa RAMP2 SPIU- The ESMP for Prioritized 169Km of Rural Roads to be Constructed/Rehabilitated, is the only ESMP prepared for Phase 1 sub-projects. The instrument assigned responsibilities for mitigation and monitoring of adverse environmental and social impacts arising from sub-project activities. Generally, the audit findings showed that in areas where compliance to carrying out mitigation responsibilities was expected, there are huge opportunities for improvement. Some of the key areas for improvement include:</p> <ul style="list-style-type: none"> i) Mitigation responsibilities such as air quality, noise control etc., were not performed to required expectations; ii) Mitigation not conducted as at when due, iii) Unavailability of documentation (progress reports, checklists, log-books to show compliance especially by Contractors etc. Importantly, Minor non-conformance was recorded for some mitigation responsibilities (Such as borrow pit reclamation and waste management). <p>The audit revealed that there were large gaps in fulfilling monitoring responsibilities especially by the Safeguards Unit and Supervisory Consultant, therefore resulting in Major non-conformance in critical areas such as air quality monitoring (this is very crucial even in the present, as dust generation on roads is very severe especially when driving on the roads) and management of security risks (Note that Lot -2 roads are in areas prone to insurgency by Boko Haram).</p>	<p>For Phase 2 RAMP2 sub-project implementation, Adamawa SPIU prepared an Environmental and Social Impact Assessment (ESIA) for 361.7km of Rural Roads and an Environmental and Social Management Plan (ESMP) for Spot Improvement of 65km Access Roads to 19 Nos River Crossings in Adamawa State. No instrument was prepared for the River Crossings as a stand-alone sub-project. Following audit findings for the ESIA, compliance was seen in adherence to mitigation measures such as i) watering of roads during pre-construction and construction phases to reduce dust levels, ii) adequate and timely sensitization of PAPs, and iii) managing security risks in project locations (Boko Haram insurgency, attacks by herdsmen, etc.). Notable compliance was also seen in the engagement of a GBV Consultant and an NGO [Global Health and Social Awareness Foundation (GHASAF)] to provide technical assistance and support respectively, in the implementation of awareness campaigns and training programs for PAPs, communities, SPIU Safeguard Unit, Supervisory Consultants and Contractors on GBV, SEA/SH and VAC issues.</p>
<p>Enugu RAMP 2 SPIU – Similarly as in Adamawa State, only one ESMP was prepared (ESMP for Prioritized 115Km of Rural Roads to be Constructed/Rehabilitated under RAMP2 in Enugu State Lot 1,2,3, & 4). While a huge opportunity for improvement exists in implementation of mitigation and monitoring responsibilities for air and water quality management, erosion control, waste management and Occupational Health and Safety (OHS), areas of minor non-conformance were uncovered. The major issues include;</p> <ul style="list-style-type: none"> • Inadequate reclamation of vegetation in cleared areas prior to and during construction, • Total neglect for noise pollution management and control • Inadequate construction of drainages in some roads to avert flooding • Poor waste management practices and • Poor adherence to OHS etc. <p>There was a minor non-conformance in the aspect of Borrow Pit Management. Specifically, Contractors embarked on reclamation of borrow pits but did not prepare Borrow Pit Management/Reclamation Plans prior to reclamation (the proactive preparation of these plans would have informed Contractors, Supervisory Consultants and the SPIUs on peculiar conditions associated with the use of Borrow Pits in the state i.e a) Pre-existence of commercial Borrow Pits and b) Availability of suitable materials for road surfacing mostly in highlands (hills). Enugu is a highland state, most of the sites where materials for road surface works were obtained were hills. After entering agreements with owners of lands in hilly areas, these hills where materials were sourced for road rehabilitation and reconstruction, were levelled. However, there were areas of uneven depth at spots where reclamation was done. (see Chapter Seven – Corrective Actions and Action Plan). In instances where Contractors dug up borrow pits; some borrow pits were reclaimed and re-vegetated specifically in Lot 3 (Neke-Mbu-Ogbodo-Aba-Obollo Eke Road). The subject of commercial borrow pits is discussed elaborately in Chapter 5 of this safeguard audit report. Areas of major non-conformance include: i) Mitigation of security risks such as a) developing security response procedures, and b)</p>	<p>Enugu RAMP 2 SPIU – One ESIA (Environmental and Social Impact Assessment (ESIA) for 270.059km of Rural Roads in Enugu State) was prepared for the Phase 2 sub-projects by the SPIU. No Safeguard Instrument was prepared for both river crossings and access to river crossings. When compared to the Phase 1, the Phase 2 audit findings revealed an improved compliance by the SPIU, Supervisory Consultant and Contractors especially in the areas of mitigation and monitoring responsibilities. Exemplary aspects include; i.) Flood and Erosion control – Where the SPIU ensured stabilization of road sections to avert the issues of erosion caused by flooding (Lots 4 and 6). ii.) GBV sensitization - SPIU engaged the services of an NGO specialized in GBV (Tamar_SARC) to provide technical support for GBV sensitization and awareness. iii.) Engagement of Security Personnel- A security group known as the Neighbourhood Watch was engaged by Contractors for the safeguarding of project sites and management of security issues. iv.) Labour management- In a bid to manage the surge of migrant workers from nearby communities, SPIU monitored the sourcing of local workforce from host communities through Community Road Construction Committees thus reducing cases of conflicts and grievances by stakeholders which may arise from hiring and engagement of migrant workers. v.) Stakeholder Consultation with Enugu Electricity Distribution Company (EEDC) and Enugu State Water Corporation (ESWC) prior to relocation of public infrastructures for electricity and water supply respectively.</p>

FINAL REPORT

<p>ensuring regular security briefings ii) Inadequate road safety infrastructure. This act of major-non-conformance requires proper and prompt corrective responses especially for future developments if required (See Chapter 7 – Corrective Action and Action Plan). This is crucial considering that during the implementation of the sub-projects (2014-2018), kidnapping was a routinely established criminal practice in South-Eastern Nigeria (Nonetheless there are no reported cases of kidnapping by the SPIU).</p>	
<p>Niger RAMP2 SPIU – One ESMP for Prioritized 200km Rural Roads to be Constructed/Rehabilitated under Lot 1, 2, 3 was prepared for Phase 1 sub-projects by the SPIU. There is a wide range of opportunities for improvement in mitigation and monitoring responsibilities such as i) occupational health and safety- with regards to improved incident and accident reporting ii) Efficiency in implementation of proffered security response measures and iii) Proper conceptualization and inclusion/adaptation of erosion and flood control/mitigation measures in reviewed designs. Importantly, major non-conformance to monitoring responsibilities occurred in monitoring responsibilities requiring i) monitoring of air pollution and dust generation especially in the construction and operation phases, ii) stakeholder engagement with herdsman throughout sub-projects implementation, iii) establishment of warning systems to alert vulnerable persons in cases of security emergency. Currently, it is important to note that banditry is a sporadic occurrence on Wawa-Malale and Auna-Tunganjika-Shanfini roads in Lot 3; a major reason for which these roads could not be visited during the fields visit as early information was made available to the SPIUs security Consultant and security detail with regards the unsafe situation on the roads.</p>	<p>Niger RAMP 2 SPIU – Three (3) ESMPs were prepared for the sub-projects implemented under RAMP2 (Phase 2 Rural Roads and River Crossings). The First, Environmental & Social Management Plan (ESMP) for Rehabilitation of Rural Roads in Niger State was prepared for the roads constructed under phase 2. The later, Spot Improvement Of 119km Rural Road in Niger State (July, 2019) was prepared to capture and address sub-projects under the River Crossings. The ESMP, (Environmental and Social Management Plan (ESMP) For the Construction Of 3x15m Span Bridge at Km 25+025 Along Badeggi-Ebba-Kataregi Road In Niger State [October, 2020]) was prepared by the SPIU to address safeguard issues that were triggered from the reconstruction of the collapsed river crossing along Badeggi-Ebba-Kataregi road. Based on the audit findings, Compliance was observed in the management of GBV as SPIU engaged the services of a Raise Foundation¹ for the provision of GBV sensitization and awareness. Compliance was also recorded in Traffic control and installation of road furniture for management traffic flow during project implementation. SPIU also ensured wastes generated from construction sites were appropriately managed by liaising with the Niger State Environmental Protection Agency as well as other waste vendors for the evacuation and management of construction and demolition wastes generated during sub-project implementation. Nonetheless, opportunities for improvement exists in monitoring the preparation and implementation of management plans such as Waste Management Plans, Traffic Management Plans, Noise control plans, etc. Of critical importance, a major non-conformance was established in incident/accident reporting as well as monitoring of environmental parameters particularly noise levels in and around the project corridors.</p>
<p>Osun RAMP2 SPIU – The ESMP for the Construction/Rehabilitation of Prioritized Rural Roads and River Crossings was the only ESMP prepared by the SPIU for Phase 1 sub-projects implementation. Note, that inasmuch as the title includes “River Crossings”, no civil works for river crossings were enumerated in the ESMP report neither were there any identified adverse environmental and social impacts associated with river crossing nor assigned institutional responsibilities for mitigation and monitoring of adverse environmental and social impacts associated with river crossings. The Osun RAMP 2 SPIU, exhibited an appreciable level of compliance in implementation of mitigation measures and monitoring responsibilities for air pollution management, noise control, erosion control and traffic management (these were verifiable through evident documentation such as monitoring reports, photographs, videos, etc). The major issues identified in ESMP implementation include: i) Non-conduct of OHS trainings for workers and ii) Inadequate installation of road safety signages/sign post and furniture (speed breakers, kilometer posts, etc.).</p>	<p>Notably, compliance was observed in the general community-level sensitization and awareness program designed for Phase 2 implementation. Interestingly, the SPIU ensured Contractors’ produced flyers and other IEC materials to aid effective communication of sub-project activities. Contractors also liaised with the Federal Road Safety Corps (FRSC) of the Osun State Command to assist in the traffic sensitization program. The flyers designed addressed HIV/AIDS, GBV/SH/SEA, restricted access to work areas etc. Compliance was also recorded in the areas of gender inclusion (hiring of both male and female workers), non-engagement of children and minors, installation of caution signs and other safety furniture etc. Several opportunities for improvement exist; summarily, these were noted in the area of GBV sensitization and awareness where the SPIU was advised in the ESMP to engage and leverage on the expertise and services of NGOs in the state that are specialized in gender issues. Additionally, opportunities for improvement exist in the area of providing adequate social amenities in the Contractors’ campsites, where there is need to aid and improve psychosocial soundness of workers by providing spots for recreation and other modes of entertainment.</p>

¹ An NGO based in Niger State and primarily involved in the GBV sensitization, awareness, mapping and management of SEA/SH issues.

FINAL REPORT

Assessment of Responsibilities for ARAP Implementation

Assessment of Responsibilities for ARAP Implementation (Phase 1)	Assessment of Responsibilities for ARAP Implementation (Phase 2)
<p>Adamawa RAMP 2 SPIU - Three versions of the ARAP were prepared for Adamawa RAMP 2. The first two Abbreviated Resettlement Action Plan for Prioritized Construction/Rehabilitation of 200 km Rural Roads to be constructed/rehabilitated (Lot 1 & Lot 3) - September 2014 and Abbreviated Resettlement Action Plan for Prioritized Construction/Rehabilitation of 200 km Rural Roads to be constructed/rehabilitated (Lot 1 & Lot 3) -May 2015 – Final Reports cover Lot 1 and Lot 3 roads only. The later being an upgrade or revised version of the former. The third version, Abbreviated Resettlement Action Plan for Prioritized Construction/Rehabilitation of 200 km Rural Roads to be constructed/rehabilitated under RAMP-2 Adamawa State LOT 2 - May 2018 – Final Report was prepared for only Lot 2 roads. Lot 2 roads were not covered in the previous ARAPs due to the heavy insurgency by Boko Haram, which stalled conducting PAPs identification and other requisite ARAP activities at the time. Compliance was seen in the establishment of resettlement committees, for effective coordination of ARAP implementation . The same is applicable for set-up of Grievance Redress Committees (GRCs) at the communities and SPIU levels for the uptake and effective redressal or feedback on complaints, concerns, suggestions etc. There was compliance to PAPs sensitization and compensation to the indicative budget for compensation (especially for Lot 2 roads as payment vouchers were readily available for verification. Compliance to the indicative budget was not verifiable for Lot 1 and Lot 3 as voucher documentation on the ARAPs was not retrieved from the previous safeguards officer who oversaw implementation, and is currently not engaged with the Adamawa RAMP 2.</p>	<p>Adamawa RAMP 2 SPIU An ARAP was prepared for the phase 2 Roads in Adamawa State. It was prepared in June 2019 and disclosed in the national dailies on 25th September, 2019. Compliance was recorded in the establishment of Resettlement Committees for effective coordination of ARAP implementation. The same is applicable for set-up of a Grievance Redress Committees (GRCs) at the state level (includes Permanent Secretary Adamawa State Ministry of Local Government, Permanent Secretary Adamawa State Ministry of Agriculture, President Adamawa Farmers Association, President National Council for Women's Societies), SPIU levels (Safeguard Officers, Communication Officer and M&E Officer) and 4 persons per communities (inclusive of one female). Whereas a larger percentage of compliance was observed for Resettlement Committees, GRC, Sensitization of PAPs and Compensation. Compliance to the indicative budget was verifiable as voucher documentation on the ARAP as well as ARAP Implementation Report were provided. However, there was major non-conformance to capacity building/training on ARAP implementation. Livelihood restoration was not implemented. because funds were not approved by the state.</p>
<p>Enugu RAMP 2 SPIU- One ARAP Revised and Updated Abbreviated Resettlement Action Plan for the Prioritized 143.5km Rural Roads to be Constructed/Rehabilitated under LOT 1,2, 3 & 4 was prepared by the SPIU. Compliance was seen in the establishment of resettlement committees. The same is applicable for set-up of a Grievance Redress Committees(GRCs), PAPs sensitization and compensation. 60% major non-conformance was recorded for livelihood restoration responsibilities.</p>	<p>Enugu RAMP 2 SPIU- Two versions of RAP were prepared for Enugu RAMP 2 (Phase 2) rural roads construction. The first, Resettlement Action Plan for the Rehabilitation of 270km Phase 2 Roads (January, 2020) covered Lots 1 to 6. The later, Addendum to the Resettlement Action Plan for the construction of 270.59km phase 2 rural roads in Enugu State (May, 2020) was prepared as an upgrade or revised version to the former, for the purpose of identifying and capturing the additional 145 PAPs (specifically in Lot 3 roads)who were omitted during the preparation of the RAP. The Addendum also addressed additional budgetary requirement for the implementation of cleared RAP. While Resettlement Committee was formed at the SPIU level, there was no constitution of a community based resettlement committee to aid effective ARAP implementation.</p>
<p>Niger RAMP 2 SPIU- One ARAP was prepared by the SPIU. Compliance was seen in the area of PAPs sensitization, with a 63% and 50% major non-conformance establishment of GRCs and implementation of livelihood restoration activities respectively. There are opportunities for improvement in several areas; remarkable in the compliance to resettlement committee set-up and operationalization.</p>	<p>Niger RAMP 2 SPIU- One ARAP, The Abbreviated Resettlement Action Plan for the 403.5km rural roads was prepared on (June, 2018), and disclosed on (August, 2018) by the Niger SPIU to capture and address 23 PAPs. While Compliance to the formation of a Resettlement Committee was observed, no resettlement was implemented as none was proposed. The Audit session revealed compliance to the indicative budget for compensation as well as proper sensitization of PAPs prior to compensation. SPIU operated a functional and effective Grievance Redress Mechanism as grievance boxes were stationed at strategic and centralized locations accessible to local community members where sub-projects were implemented. A committee constituting of the traditional/community leaders, Imams, women and youth leaders as well as other selected distinguished members of the community was established at the different project communities for the resolution of issues and grievances during the project implementation. PAPs were satisfied with the compensation they received and displayed a good perception of the project.</p>
<p>Osun RAMP 2 SPIU- One ARAP Abbreviated Resettlement Action Plan for the Construction/Rehabilitation of Prioritized Rural Roads and River Crossings was prepared by the SPIU. Compliance was seen in the area of PAPs sensitization and complete compliance payment of compensation according to the compensation budget. There was a complete major non-conformance of livelihood restoration activities and levels of minor non-conformance with regards resettlement committee and GRC operationalization.</p>	<p>Osun RAMP 2 SPIU -Two versions of the ARAPs were prepared for Osun RAMP2, Phase 2 implementation. The first, Abbreviated Resettlement Action Plan for the Construction of 307.9km Rural Roads in Osun State which was prepared and disclosed in-country in June and July 2018 respectively. It addresses a total of 188 PAPs. The second is an addendum to the previous ARAP titled: Addendum to Resettlement Action Plan for the Construction of 307.9km Rural Roads in Osun State. This version was prepared (May 2019) and disclosed in-country in July 2020. The ARAP Addendum was prepared to record and include additional three (3) PAPs who were eligible for compensation on account of the impact to their assets which emerged due to road realignment in the construction designs of the a) Oshiri – Agbonda – Kuta road, b) Leventis Network Roads and c) the proposed road extension along Ekutu – Owode – Adara road. Therefore, the overall total of PAPs compensated is 191. The set-up of Grievance Redress Committees (GRCs), was done according to the specifications in the ARAP (at the State, SPIU and community levels). Grievance boxes were set up in all the "Lots" for the uptake of grievances. Also, grievances and responses are logged on a grievance log. However, there is an opportunity for improvement in the community level GRCs majorly in the proper positioning of grievance boxes in strategic locations (markets, religious centers, parks etc.) especially in Ifon-Okiti Iduya.</p>

ES 6: Emphatic Highlights of ESMP and ARAP Implementation

Capacity Building

A lack of, or inadequate capacity building on implementation of environmental and social (E&S) mitigation measures, and monitoring on E&S performance of sub-projects for SPIU staff/MDAs/Contractors/Supervisory Consultant ranks as the highest, and most critical set-back and limitation in ensuring effective safeguard responsibilities are undertaken during sub-project implementation. Generally, capacity building on ESMP and ARAP/RAP implementation was not conducted effectively by the Enugu and Niger RAMP 2 SPIUs (for Phase 1 Sub-projects). No capacity building for Phase 1 implementation was conducted by Adamawa and Osun RAMP 2 SPIUs. For Phase 2 roads and Access Improvements to River Crossings, the issue of “No Capacity Building” to support ESMP and ARAP/RAP implementation is broadly evident, except for Osun and Enugu State SPIUs, where ESMP implementation training was conducted by the E&S Focal Persons of the Supervisory Consultant, and the FPMU/Enugu State TA for Environment, respectively. The core adverse impact of not implementing capacity building as recommended in safeguard instruments is a failure to fulfilling E&S obligations as proffered, satisfactorily. The lack of capacity building is a major reason for poor E&S performance, in that during the audit process, it was obvious that measures were not implemented as required because most parties were ignorant of their institutional responsibilities either for mitigation or monitoring.

Project and Contractors’ Adherence to Environmental Due Diligence

The auditing of safeguard responsibilities assigned to Supervisory Consultants in Adamawa and Enugu SPIUs showed a good performance in some monitoring responsibilities, as there was verifiable documentation provided by the Supervisory Consultants respectively, demonstrating monitoring responsibilities on matters such as i) siting of camp sites, ii) provision of mobile toilets iii) waste management iv) occupational health and safety, etc. However, instances also exist where monitoring responsibilities were not carried out, thus a minor or major non-conformance. For Osun and Niger SPIUs inadequate documentation available nor substantial means of verifying their level of compliance. (See Chapters 5 and 6 for information on compliance/non-conformance, and specific strengths and gaps respectively). Interestingly, for Phase 2 sub-projects, much improvements in E&S responsibilities for Supervisory Consultants was observed (documentation, pictures, videos, progress reports, defined roles for E&S Focal persons and GBV focal persons etc). On the aspect of documentation, Supervisory Consultants from Adamawa, Osun and Enugu SPIUs were able to provide stimulating and analytical evidence supporting their E&S mitigation/monitoring responsibilities. Specifically, such documentation included accident investigation forms, work place risk assessment forms, E&S monitoring checklists etc.

General Safeguard Issues & Adequacy of Appropriate Measures taken in Safeguard Monitoring

One of the most effective mitigation measures, shown by appropriate documentation and feedback from communities were the information, education and communication (IEC) approaches implemented during project implementation. A reasonable level of awareness was established before, during and after sub-project(s) implementation which minimised conflicts, negative perceptions from PAPs. Essentially, ARAP implementation was conducted prior to commencement of civil works (except for Enugu state), which gave PAPs a sense of confidence on RAMP2 in the respective project states. In Phase 2 sub-project implementation, there are opportunities for improvement for the Adamawa SPIU Safeguard Unit in i) incident and accident reporting, specifically in the sharing and availability of accident and incidents logs, ii) preparation of Traffic Management Plans which address specific traffic management issues as per the Lots assigned to Contractors and not generic mitigation measures. In Enugu RAMP2, better monitoring on waste management is required, especially to avoid waste burning which was practiced by two (2) of the Contractors. This also narrows down to effective review of the Contractors’ Waste Management Plan to ensure waste types, waste streams, treatment and final disposal approaches are captured, shared with the SPIU and guidelines/approval obtained from SWMAs. Matters on other SPIUs are discussed in Chapter 6 of this report.

Gender Base Violence/Sexual Harassment

The ESMPs for the four (4) project states were prepared prior to the publishing of the World Bank, Good Practice Note, Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, (September 2018). Following on this background, issues concerning GBV, SH, SEA, and VAC were not addressed in the safeguard instruments, prepared for the Phase 1 sub-projects. Inasmuch as strong emphasis on the subject matter, was not a major requirement at the time, current practices in Bank funded projects require the inclusion

FINAL REPORT

GBV/SH/SEA mitigation measures for projects likely to cause labour influx. The E&S Audit for Phase 2 sub-projects, shows measurable improvements in compliance to GBV/SH/SEA management approaches. Throughout the RAMP2 States, some of the attained landmarks in addressing GBV/SH/SEA include: i) Effective stakeholder sensitization and awareness creation, ii) Mapping for GBV services and liaisons with NGOs specialized in GBV/SH/SEA to serve as referral centres for survivors of GBV, iii) Early preparation and signing of COCs by Contractors including staff and inclusion of appropriate clauses on GBV in COCs, etc.

Labour Influx

The ESMPs prepared for phase 1 sub-projects, except for that prepared by the Osun RAMP 2 SPIU did not address the issues of labour influx. A major limitation/gap uncovered in the ESMPs for the project states, was the lack of mitigation measures addressing the management of labour influx, or a Labour Influx Management Plan as part of the annexure. No documented evidence could be provided with regards to labour influx management, however some stakeholder consultations (See Chapter 6) showed that labour influx did not result in issues of SH/SEA in both Phase 1 and Phase 2 implementation. For the Phase 2 safeguard instruments, Labour Influx Management Plans were proffered as suitable mitigation measures (for some States) for ESMP implementation alongside templates provided in the annexures. However, Contractors did not prepare independent Labour Influx Management Plans to address labour influx. Nonetheless, they ensure mitigation of adverse impacts associated with labour influx by i) hiring locals (unskilled labour) from communities along the project corridors ii) Not hiring at the “gate” but used recruitment offices, iii) ensuring workers signed CoCs and iv) requesting birth certificates/age declarations to avoid hiring workers beneath the required minimum age (18 years Nigeria; 14 years WB). Additionally, a very poor practice in Phase 1 implementation was the late signing of CoCs in 2019 for sub-projects that were completed in 2017 and 2018.

Livelihood Restoration Strategies

According to instructions from the ARAPs prepared for the sub-projects at the level of the SPIUs, Livelihood restoration is proposed specifically for Adamawa and Niger RAMP2 SPIUs. The livelihood restoration is projected to restore the livelihood of some PAPs who were economically displaced or livelihood sources were halted as a result of civil works. Additionally, the concept of the livelihood restoration is also to promote positive reception of the proposed sub-projects and foster collaborative linkages between the SPIU and the project communities. Nonetheless, due to the small allocation of funds for livelihood restoration in Niger State, the implementation of livelihood restoration strategies in the SPIU was forestalled. The Adamawa SPIU could not provide substantial reasons for an increase (by NGN 370,000) in the planned budget (NGN 300,000) for livelihood restoration.

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 safeguard documents and associated reports especially at the level of the SPIUs. In the course of the audit, difficulty was experienced in promptly accessing crucial documents such as vouchers for payment of compensation for PAPs, monitoring reports, progress reports etc. Of primary significance, was the issue of proper handing over of documents from previous/disengaged safeguard officers to currently engaged safeguard officers, as well as availability of these documents with the MIS Officer(s). This is particular in Adamawa and Niger RAMP2 SPIUs. Some safeguard officers are ignorant of the fact that monitoring reports are essential to the success of ESMP and ARAP implementation. Furthermore, in instances where documentation is available, the practice is to secure documents in hard copies rather than readily available hard and soft copies. Summarily, the unavailability of documentation especially as evidence to carrying out mitigation or monitoring responsibilities, justifies the opportunity for improvement in this crucial area. A better attitude and approach to documentation and document management was established in Phase 2 sub- projects' implementation.

Occupational Health and Safety Evaluation

In both Phase 1 and Phase 2 sub-project implementation, including Access/Spot improvements to River Crossings, there is opportunity for improvement as regards OHS Management. The Contractors did not prepare or submit OHSM Plans and SPIUs did not monitor to ascertain the level of compliance towards issues relating to Occupational Health and Safety. Inasmuch as accidents were reported, there was no organized system for

FINAL REPORT

accident/incident reporting. This limited proper evaluation/assessment of accident/incident reporting procedures and other OHS issues.

ES 7: Site-Specific Conditions of Roads

The site-specific conditions of Phase 1, Phase 2, River Crossings and Access/Spot Improvement to River Crossings are highlighted in Chapter 5 of this document. Nonetheless, some of the significant environmental and social conditions which cut across the roads rehabilitated by the respective SPIUs are listed below

Phase 1 Roads

SPIU	LOTS	Name of Roads	Current conditions of Roads	
			Environmental	Social
Adamawa	LOT 1	Jambutu-Boggare	Has not undergone routine maintenance in a while. Hence, presence of weeds and potholes Heavy generation of Fugitive dust. Accumulation of solid wastes and silts in line drains	No Safety Signages No Speed Bumps. Increase/influx of residents after road construction
	LOT 1	Labando-Gwakrah-Koh-Goron-Borrang	Heavy generation of Fugitive dust. Erosion prone sites Poor river training 5 New borrow pits were dug and none was reclaimed	There are Km posts Community recommends surface dressed roads
Enugu	LOT 2	UNTH – Enuguagu Ndiagu-Umuaniagu–Obe – Amuri Road	Fugitive dust. Poor maintenance (Weeds encroaching to the roads). Poor drainage channels have created erosion ravine.	No Safety Signages No Speed Bumps
	LOT 4	Ikwoka –Amagu – Ajuona – Akabusiye – Obimo Road	Due to the topography of the project area (slopy) some of the earth line drains are completely covered by slit because of run-off which has exacerbated risks of erosion ravine on constructed road.	
Niger	LOT 1	Wuya Suman-Lemu	No dust was observed as road was surface dressed No or poorly designed drainage systems exacerbating erosion occurrences Erosion prone sites	No Speed Bumps aggravating incidences of livestock road kills. (Local community made speed control designs to manage this issue)
	LOT 2	Sullu Junction-Tafa	Fugitive dust. Poor road maintenance. (weeds, pot holes etc) Accumulation of silts in line drains and culverts Improper decommissioning of staging area (No revegetation, equipment and materials are not properly cleared and evacuated from staging area).	No Speed Bumps. Increase/influx of residents after road construction Flooding of shops lying on a low terrain close to the road
Osun	LOT 1	Ikonifin – Sade - Ajagunlaase	Road susceptible to flooding as a result of non-construction of drainage system Weed encroachment due to poor maintenance Road in deplorable state resulting from poor maintenance	Loss of travel time resulting from bad road. Increase in transportation fare resulting from time

FINAL REPORT

SPIU	LOTS	Name of Roads	Current conditions of Roads	
			Environmental	Social
				taken to reach destination
	LOT 4	Ilesa – Ilo Olomo Boundary (DBST)	Waste accumulation in drainages Weed sprouted in drainages due to poor maintenance	Non-installation of road signs and construction of speed bumps

Phase 2 Roads

SPIU	LOTS	Name of Roads	Current conditions of Roads	
			Environmental	Social
Adamawa	LOT 1	Numan/Biu road - Barre	Heavy Generation of Fugitive dust Accumulation of silts in line drains and culverts	No Signages No Speed Bumps.
	LOT 2	Polewire - Ndikong	Increased fugitive dust Eroded sides of one of the new installed hydraulic structures due to lack of stone pitching features	No speed bumps No signages
	LOT 2	Umu – Ezejor – Agu – Udele – Itabor Road with Spur at Ubahor	Aggravated fugitive dust generation from vehicles on transit. Roads constructed with good laterite and good width. Line drains starting to wear away as a result of shallow depth.	Safety Signages and Kilometre Posts Installed Speed Bumps constructed
Enugu	LOT 5	Owere-Umuabor-EdemUmabor-Aguudene-Mbu	Increased dust generation exacerbated by vehicles on transit. Good width of constructed roads	Speed bumps and safety signages installed especially in built up areas. Safety signals and traffic signs
Niger	PHASE 2 ROADS NOT VISITED DUE TO EXTREME BANDITRY AND SECURITY THREATS (Nationwide Alert)			
Osun	LOT 2	Ifon – Okiti – Idi Iya with Ibigbami	Fugitive dust waste accumulation on drainage channel	Likely occurrence of frequent accidents as a result of over-speeding by drivers due to no construction of speed bumps
	LOT 3	Ila Farm Settlement	Fugitive Dust Increased infiltration/overflow of laterite into line drains causing blockage of culverts	Likely occurrence of frequent accidents as a result of over-speeding by drivers due to no construction of speed bumps

FINAL REPORT

River Crossings/Access to River Crossings

SPIU	LOTS	Name of Roads	Current conditions of Roads	
			Environmental	Social
Adamawa	LOT 3	Kalambare-Asabe	Fugitive dust in access to river crossings	Nil
	LOT 5	Buwangal and Gardona	Poor maintenance of river crossing	Nil
Enugu		Ekwegbe Agu –Ekwegbe	Increased fugitive dust observed on the access roads leading to the river crossing Partial dilapidation of stone pitch works done as a result of inadequate construction materials. Partial clearance of vegetation around the watershed could predispose surface water to silt accumulation from run-off	Safety signages are installed on the access roads to river crossing.
		Oke Ali (Oke Ali stream)	Increased dust generation especially during use of roads. Well-constructed and widened access road leading to river crossing.	No safety signages along the spot improved access to river crossing.
Niger	LOT 1			
	LOT 2			
Osun	LOT 5	Asejere River	No erosion control works (rip raps, stone pitching) leading to accumulation of silt	Nil
	LOT 5	Powerline River	Poor maintenance leading to waste accumulation in river	Nil

ES 8: State-Specific Conditions

Workers Health and Safety - The major occupational health and safety (OHS) issues in implementation of Phase 1 and Phase 2 sub-projects including Access/Spot Improvement, were in the establishment of site-specific OHS plans, and Safe Work Procedures. In Enugu State, there was an incident where, a worker from one of the Contractors, lost his hand during work. An understanding on the application of the “Hierarchy of Controls” approach would have provided guidance in averting this accident. Specifically, where machinery and equipment running on conveyor belt systems are in use, Elimination², Substitution³, Engineering Controls⁴ and/or Administrative Controls⁵ will be the most appropriate approach. Also, in Adamawa State, a fatality was recorded during an offloading activity, where metal poles and bars fell on, and crushed a worker. Although these accidents can not be averted with the use of PPEs, the audit suggests that if a Job Hazard Analysis (JHA) was conducted for the respective activities, Safe Work Procedures (Administrative Controls) would have been prepared, and averted the incident/accident by 60% (International Labour Organization). Overall, there needs to be a behaviour change towards OHS at both the FPMU and SPIU levels. The FPMU might consider procuring services of OHS officers to provide technical assistance on OHS matters for SPIUs. Additionally, a robust training program on OHS is required for FPMU and SPIUs. A poor compliance to the use of PPEs was recorded during the audit, likewise SPIU personnel do not use appropriate PPEs as required, especially during field visits.

Community Health and Safety – The major community health and safety issue attributed to the sub-projects is road safety, precisely where there is absence of speed bumps and signages on certain roads.

² Elimination is aimed at totally removing the source of the hazards thus greatly reducing the probability or chance of an accident.

³ Substitution basically involves replacing the hazard with a less hazardous condition, process or method.

⁴ Engineering Controls involves designing and/or redesigning the work environment and the job itself to reduce or eliminate exposure to hazards.

⁵ Administrative Control are aimed at reducing employee exposure to hazards that engineering controls fail to eliminate. Administrative Controls work by designing safe work practices into job procedures and adjusting work schedules. Ultimately, effective administrative controls will successfully eliminate the human behaviours that result in about 95% of all workplace accidents.

FINAL REPORT**Assessment of Sanitation and Waste Management Procedures and Effectiveness**

In the area of workers sanitation, mobile toilets were provided in some instances by Contractors while there was a major non-conformance by other Contractors in this regard. Additionally, even where sanitation facilities were provided, workers preferred open-defaecation, thus exposing themselves to risks of snake bites, or attacks by hoodlums or criminals. With regards waste management, an opportunity for improvement is required for the general approach to waste management as seen in the implementation of Phase 1 and Phase 2 sub-projects. There was no liaison with the respective State Environmental Protection Agencies (SEPA's) in some cases, neither was construction waste managed according to state regulations and standard procedures. Some Contractors reported that waste generated during their civil work activities, were disposed of in borrow pits.

Borrow Pit Management and Key Safeguard Concerns

There is a peculiar issue as regards borrow pit management in all RAMP 2 states. However, Safeguard Units require improvement in their E&S commitment to monitoring the borrow pit acquisition and reclamation process. In several states, there are portions of unreclaimed borrow pits; many of which were unknown to the safeguards Units up until this environmental and social safeguards audit (Phase 1). Interestingly, the Osun RAMP 2 SPIU reclaimed all its borrow pits. Niger RAMP 2 was unable to provide details with regards GPS coordinates of borrow pits for Phase 1, while Enugu used some commercial borrow pits which was managed by other persons and thus not reclaimed completely. Primarily, the Contractors were responsible for negotiating with persons or communities for the lease of land for the purpose of use as borrow pits. In many occasions, evidence of negotiations, lease and payments were provided and sighted during the audit. The major reason affecting borrow pit reclamation, is that private persons, entities or communities who own the land used for borrow pits, request the Contractors to leave the borrow pits uncovered after road rehabilitation, so that they can use them for personnel, commercial and domestic purposes (such as, further leasing to other Contractors, a place for watering cattle and other small ruminants etc). Chapter 5 of this report provides more details on the status of borrow pits used for Phase 1 and Phase 2 sub-projects.

ES 9: Corrective Actions

Some corrective actions proffered in the audit report include:

Adamawa SPIU

1. In areas prone to flooding engineering design should consider design above flood level. Flooding assessment should be done both during dry and wet seasons in order to ascertain height of flood water. This will help in the design, and help avert subsequent flood issues
2. Ensure all compensation pay slips captures all identified PAPs and contain passports of PAPs, as well as amount and signatures
3. SPIU should ensure Contractors submits a Borrow-Pit Reclamation Plan prior to implementation of sub-projects. Also, for subsequent sub-projects, SPIU procurement officer, safeguards officers and IE, should factor in the amount for borrow-pit reclamation in the contractors bidding document. There should also be a documented agreement between the land owner and the contractor on complete reclamation of borrow-pit when decommissioning.
4. Ensure proper documentation of all safeguard activities and make a calculated shift from hard to soft documentation
5. Develop a complete handover system to be carried out prior to the exit of each Safeguard Officer. This is to ensure a smooth transition of information and documentation from old employees to new hires
6. Ensure all unreclaimed borrow pits are reclaimed before the end of the defect liability period.

ENUGU SPIU

1. The SPIU should be mandated to utilise a screening checklist for screening of subprojects, to ascertain appropriate instruments relevant for that subproject
2. There should be adequate liaison between SPIU procurement unit and the safeguard unit during preparation of contractor's scope of works and bidding documents

FINAL REPORT

3. In subsequent projects, the SPIU safeguards unit should ensure to formally obtain Social License to Operate (SLO) prior to kick-off of subprojects
4. SPIU/safeguards should monitor the development and implementation of a site-specific Occupational Health and Safety Management Plan and Procedures equivalent to the nature and scale of the subprojects and proportionate to the health and safety risks.
5. Ensure proper documentation of all safeguard activities and make a calculated shift from hard to soft documentation.
6. Develop a complete handover system to be carried out prior to the exit of each Safeguard Officer to ensure smooth transition of information and documentation from old employees to new hires.
7. Ensure all unreclaimed borrow pits are reclaimed before the end of the defect liability period.

NIGER SPIU

1. Design an effective communication system and strategy that will address synergy among all relevant stakeholders, SPIU units, MDAs and developmental organizations
2. Employ the services of a GBV specialist to handle the SEA / VAC/ GBV activities relating to the implementation of sub-projects.
3. Ensure accuracy in the details and payments of PAPs for accountability and transparency.
4. Ensure proper documentation of all safeguard activities and make a calculated shift from hard to soft documentation.
5. Develop a complete handover system to be carried out prior to the exit of each Safeguard Officer. This is to ensure a smooth transition of information and documentation from old employees to new hires.
6. Ensure all unreclaimed borrow pits are reclaimed before the end of the defect liability period.

OSUN SPIU

1. SPIU should ensure that screening and scoping are done for sub-projects prior to the preparation of safeguard instruments to foster better environmental planning and design.
2. In subsequent projects, SPIU should ensure proofreading of disclosure documents (Letters and Newspaper adverts) are done prior to public disclosure and advertisement.
3. Regular capacity buildings on ESMP implementation should be conducted for the SPIU/safeguards to foster improved practices with regards to environmental and social performance of sub-projects.
4. Constitute community-based Grievance Redress Committees and Resettlement Committee. Also ensure Feedback boxes are located at strategic and centralized points to foster accessibility to local community members.
7. Ensure proper documentation of all safeguard activities and make a calculated shift from hard to soft documentation.
5. Develop a complete handover system to be carried out prior to the exit of each Safeguard Officer. This is to ensure a smooth transition of information and documentation from old employees to new hires
6. Ensure all unreclaimed borrow pits are reclaimed before the end of the defect liability period.

Implementation Schedule

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

FINAL REPORT

S/N	Activity Description	Responsibility	DEC 2020				JAN 2021				FEB 2021				MAR 2021	
			1	2	3	4	1	2	3	4	5	6	7	8	9	10
1	Capacity Building on Environmental and Social Safeguard Monitoring	FPMU, SPIUs														
2	Review and Approval of Budget for Implementation of corrective actions (counterpart funding)	State Government														
3	Implementation of corrective actions (counterpart funding)	State Government														
4	Submission of progress reports for implementation of corrective actions	Contractors procured by State Governments														

Note: Since the RAMP 2 Project is scheduled to end in March, 2021, implementation responsibilities that exceed this date are to be carried out by the State Government through their counterpart funding.

ES 10: Action Plan Cost Estimates

The total estimated cost for implementation of the action plan for all the SPIUs (Phase 1) is Fifty-Seven Million, Nine Hundred and Seventy Thousand Naira (N57,970,000) only. Likewise, the total estimated cost for implementation of the action plan for all the SPIUs (Phase 2) is Fifty-One Million, Two Hundred and Five Thousand Naira (N51,205,000) only. The cost is significant due to amount required for outstanding borrow pit reclamation, reconstruction of drainages, installation of road and bridge safety infrastructure.

ES 11: 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 issues associated with labour influx could not be verified, especially considering that sub-projects were mostly completed; responses from stakeholders in communities proved to be a useful performance indicator.

Summary of Key Consultation Comments, Concerns and Suggestions from PAPs

State	Comments, Concerns, Suggestions	Responses by SPIU and Consultant
Adamawa	<ul style="list-style-type: none"> General good conduct and behaviour of Contractors during sub-projects' implementation at the respective lots Negative impacts associated with labour influx were not identified (SH/SEA/VAC). Exacerbated dust generation during the operation phase of the sub-projects Road conditions have begun to worsen (groove and rill formation) making manoeuvring of motorcycles a bit difficult (one accident occurred in Demsa (Lot 3). Some houses and homes have become prone to flooding (Demsa) Community members stated they prefer the borrow pits being left as dug, so that they can use them to support livelihood activities. But at Labando-Gwakrah-Koh-Goron-Borrong Road with 5 borrow pits, the community requested for these pits to be reclaimed since they are farmers and do not need the water accumulated in the pits to water cattle. Also, possibilities of community member(s) falling into deep pits filled with water. 	<ul style="list-style-type: none"> The SPIU responded by saying it was not within their capacity to asphalt the road as it was not included in the design. Nonetheless, the Road Maintenance Group will be instructed to construct earthen speed breakers in built-up areas to reduce the issue of aggravated dust. The SPIU assured the E&S Consultant that the issue of grooves and rills formation making manoeuvring of motorcycles a bit difficult, as seen at Demsa in lot 3, will be taken care of by the Road Maintenance Group. The also assured that the Road Maintenance Group will construct speed breakers to avert the issue of accidents The SPIU assured the PAPs that they will meet with the owners of the borrow pits and ensure that the borrow pits are reclaimed, as specified by the Bank.

FINAL REPORT

State	Comments, Concerns, Suggestions	Responses by SPIU and Consultant
Enugu	<ul style="list-style-type: none"> Aggravated dust generation during the operation phase of the sub-projects Road conditions have begun to deteriorate Most borrow pits are elevated/ hilly lands and stakeholders are not too concerned about the health and safety risks associated with borrow pit non-reclamation. Rather they prefer the borrowing to continue, so that they can use the low/ levelled hills to build houses. Routine road maintenance is strongly required and should be monitored. Additionally, RAMP might want to consider layering other roads with asphalt or better non-dust generating surface dressing, as this will remarkably reduce the adverse impacts of dust generation. 	<ul style="list-style-type: none"> The SPIU responded by saying it was not within their capacity to asphalt the road as it was not included in the design. However, the Maintenance Gang will be instructed to construct earthen speed breakers in built-up areas to reduce the issue of aggravated dust. The SPIU assured the E&S Consultant that the deteriorating conditions of the road will be taken care of by the Road Maintenance Gang
Niger	<ul style="list-style-type: none"> Suleja Abuchi Izom – Local Community members resorted to the use of large tree stems, woods and stones to block roads at intervals to reduce the speed of moving vehicles. Some engaged stakeholders disclosed their animals have been killed on several occasions as a result of speedy vehicles along the road, thus construction of speed bumps would be well appreciated. Suma Lemu (Lot 1) and parts of Suleja Abuchi Izom (Lot 2) that was surface dressed. Sabon Wuse Ijagwari-Stakeholders suggested better drainage as; <ol style="list-style-type: none"> Laterite overflow from roads into drainage systems has caused blockages in almost all sub-projects locations. Community dumpsite sited very close to the road has encroached into the drainage channels constructed thus blocking it and aggravating incidences of flooding around the area. 	<ul style="list-style-type: none"> The SPIU stated that the community led Road Maintenance Group will be instructed to construct lateritic base speed breakers to avert the issues of accidents and aggravated dust impacts in built-up areas, and also ensure proper sanitation of the drainage channels. The SPIU buttressed on the need for the community to participate in waste management and dumpsite reclamation, as this was as a result incessant dumping of waste on that location by the community members.
Osun	<ul style="list-style-type: none"> A stakeholder was identified in Odogbo Iwara stated that a child had an accident on the road as a result of no speed bumps and reckless driving of a motor cyclist Exposure to health issues (cough) as a result of fugitive dust A Food vendor identified on the project corridor in Agoro – Ikonifin. Complained of low sales in business as a result of fugitive dust. The chairman of the maintenance group of Agbowu Eleru expressed his satisfaction on the project. Chairman of maintenance group identified in igbowiwi stated he expressed his preference for compensation in cash Additionally 	<ul style="list-style-type: none"> The SPIU stated that the Maintenance Group has not been keeping up with their own part of the bargain, thus, the reason for the delay in payment since September 2020, as payment is based on performance. Nonetheless, negotiations are on-going between the SPIU and the Maintenance Group to resume routine maintenance of the roads. The SPIU stated that it was not within their capacity to asphalt the road to avert the issue of aggravated dust, as it was not included in the design. However, the SPIU implored the E&S Consultant to factor the issue of aggravated dust in its recommendation