E4256

Federal Republic of Nigeria

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

For

STATE AND LOCAL GOVERNANCE REFORM (SLOGOR) PROJECT

FINAL REPORT

June, 2013

LIST OF ABREVATIONS AND ACRONYMS

AfDB	African Development Bank
ANSEPA	Anambra State Environmental Protection Agency
AU	African Union
CRSEPA	Cross River State Environmental Protection Agency
DfID	Department for International Development
EA	Environmental Assessment
EMS	Environmental Management Systems
EMP	Environmental Management Plan
EPA	Environmental Protection Agency
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Specialist
FEPA	Federal Environmental Protection Agency
FGN	Federal Government of Nigeria
FMEnv	Federal Ministry of Environment
GoN	Government of Nigeria
HSE	Health Safety and Environment
IGR	Internally Generated Revenue
ISDS	Integrated Safeguards Data Sheet
JISEPA	Jigawa State Environmental Protection Agency
KASEPPA	Kano State Environmental Planning & Protection Agency
LGAs	Local Government Authority
MDA	Ministries Department and Agencies
NEEDS	National Economic Empowerment and Development Strategies
NPCU	National Project Coordinating Unit
NGOs	Non-Governmental Organization
OSSEPA	Osun State Environmental Protection Agency
PAD	Project Appraisal Document
PC	Project Coordinator
PCN	Project Concept Notes
PEMFAR	Public Expenditure Management and Financial Accountability Review
PER	Public Expenditure Review
PFM	Public Financial Management
PPE	Personal Protective Equipment
SEEDS	State Economic Empowerment and Development Strategy
SEPA	State Environmental Protection Agency
SPCU	State Project Coordinating Unit
SGCBP	State Governance Capacity Building Project
SLOGOR	State and Local Governance Reform
SMoEnv	State Ministry of Environment
SSA	Sub-Sahara Africa
SSC	State Steering Committee
TOR	Terms of Reference
YOEPA	Yobe State Environmental Protection Agency

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EXECUTIVE SUMMARY

ES 1 Project Background and Objectives

The Federal Government of Nigeria has received a technical assistance loan from the World Bank to support the State and Local Governance Reform (SLOGOR) project operating in states of Anambra, Osun, Cross River, Kano, Jigawa and Yobe.

The project development objective is to improve transparency, accountability and quality in public finance management, with a view to strengthening governance in the participating states. The project is consistent with the development objectives of the current administration's Vision 20-2020, State Economic Empowerment and Development Strategy (SEEDS) and other state development strategies. It also contributes to the higher level objectives expressed in the second Nigeria Country Partnership Strategy (CPII) of the World Bank, the Nigeria Country Strategy Paper and national Indicative Programme, 2008-2013 of the EU, the African Development Bank (AfDB), UK Department for International Development (DfID) and United States Agency for International Development (USAID).

The program which span up to five year, is to be achieved through four components;
Component A: Public Financial Management Reforms
Component B: Support to local governance
Component C: Project Coordination
Component D: Supervision of Trust Fund activities

Scope of the ESMF
The ESMF outlines the processes and procedures to be followed when any activity that will be financed by SLOGOR has the potential to trigger any of the World Bank safeguard policies. It includes details of the existing environmental laws and regulatory framework in the country; World Bank safeguard policies, analysis of environmental and social impacts including alternatives; institutional arrangements for implementing the ESMF, capacity building needs; and public consultation carried out during project preparation. This ESMF shall clarify environmental mitigation measures, organizational arrangements and design criteria to be applied to the project. The expected output is a report that provides basic information about the scope of negative environmental and social impacts to be induced by project operations; mitigation and monitoring actions to be taken, and indicative cost implications. This ESMF covers six states in the project namely: Anambra, Cross River, Osun, Kano, Jigawa and Yobe. This ESMF will be accordingly updated, reviewed and cleared prior to re-disclosure country wide in Nigeria and InfoShop.

Safeguard policies triggered by SLOGOR project

The SLOGOR project triggered the World Bank Operational Policy (OP 4.01)-Environmental Assessment and has been assigned an Environmental Screening Category "B" as the potential impacts are likely to be small in scope, site specific, non-cumulative and easy to remediate.

Sub-project activities in component B which are likely to be associated with the renovation and rehabilitation of existing institutions that have negative impact on the environment are the potential environmental and social concerns.

ES 2 Policy, Legal and Administrative Framework

The policy, legislation and institutional procedures of Nigeria which are relevant to the SLOGOR project and therefore considered include:

Nigerian National Policy Frameworks

- The Transformation Agenda 2011 – 2015
- Constitution of the Federal Republic of Nigeria 1999

Environmental Regulatory Frameworks

- Federal Environmental Protection Agency (FEPA) Act 1988
- National Policy on Environment 1989
- Environmental Impact Assessment Act 1992
- National Guidelines on Environmental Audit in Nigeria 1999

World Bank Operational Policies

Most applicable policy of the Bank triggered by the project is:

- *OP 4.01: Environmental Assessment*

ES 3 Sub-Project Potential Environmental and Social Impacts and Mitigations

The project will improve transparency, accountability and quality in the public finance management; with a view to strengthening governance. The potential impacts depend on sub-project activities that are likely to be associated with the renovation and rehabilitation of existing institutions and their site-specific locations. Summarized below are the project potential positive and negative impacts.

Potential beneficial impacts

Potential Beneficial Impacts	
	ENVIRONMENTAL
Aesthetics and air quality	Cleaner air and aesthetics in the project area of influence
Occupational Health and Safety	Minimization in occupational health hazards
Performance and Governance	Improved environmental performance and governance
ESMP process	Increased efficiency in the ESMP process
	SOCIAL
Improved Public Finance Management	Enhanced multi-year fiscal planning, expenditure policy and budgeting Timely auditing and reporting Effective and transparent public procurement management Transparency in personnel registry and payroll controls Effective tax registration and assessment measures Enhanced delivery of civil service training

Potential adverse impacts

Potential Adverse Impacts		Recommended Mitigation Measures
ENVIRONMENTAL		
Renovation/Rehabilitation phase		
Air quality	▪ Emission of dust and particulate matter leading to the reduction of air quality; ▪ Air pollution from burning of renovation waste e.g. wood, scrap materials, paper.	▪ Introduction of dust reduction measures at rehabilitation sites(sprinkle water to reduce dust) ▪ Avoid rehabilitation activities during bad weather ▪ Adopt proper waste management strategy ▪ Prohibit waste combustion on site ▪ Service equipment regularly ▪ Workers should use PPEs (nose masks)
Water quality	▪ Potential pollution of nearby surface water or ground water though runoff of pollutants e.g. lubricating oil, paint etc from workshop areas etc ▪ Wastewater spills or run-off but with little or no adverse effect on the immediate environment.	▪ Appropriate containment measures for all operational areas and proper disposal of used lubrication oil (dedicated containers). ▪ Site storage facilities far from water bodies. ▪ Regular collection of work sites wastes for proper disposal ▪ Liquid waste discharged at designated outfalls after effluent treatment to protect water resources ▪ Regular emptying of on-site latrines and toilets ▪ Prohibit use of defunct equipment
Soil quality	▪ Point source contamination around workshop areas ▪ Contamination from waste materials e.g. cement, paints, lubricants, fuels	▪ Appropriate containment measures for all operational areas and proper disposal of used lubricants (dedicated containers, bund walls). ▪ Restrict site activities to relevant areas only

	and detergents	
Noise Pollution	▪ Loud noise resulting from the use of equipment during renovation and rehabilitation works.	▪ Installation of sound insulation such as silencers, mufflers, etc ▪ Schedule work periods to avoid working hours ▪ Use appropriate well serviced equipment to reduce noise output
Flora and Fauna	▪ Contamination of biota; ▪ Vegetation clearing resulting in loss of valuable habitat, species diversity and population levels	▪ No siting and excavations in sensitive habitat. ▪ Restrict site activities to relevant areas only
Solid Waste	▪ Solid waste generated from demolition and rehabilitation activities containing potentially hazardous materials (e.g asbestos)	▪ Quick sorting, collection and disposal of waste removed from the sites in accordance with applicable regulations. ▪ Employ services of registered waste management company ▪ Convert some debris to fuel wood, and dispose of the rest properly ▪ Prohibit illegal dumping of solid wastes
Operation phase		
Air quality	▪ Air pollution from burning of waste generated from project operations e.g. scrap materials, paper etc	▪ Prohibit waste combustion. ▪ Provide air/ventilation vents for better air
Waste water	▪ Waste water run-off from improper waste management	▪ Adopt proper waste management strategy
Water and soil quality	▪ Pollution from on-site sewage systems;	▪ Regular emptying of on-site latrines and toilets
Solid Waste	▪ Illegal dumping of solid waste in drains	▪ Adopt proper waste management strategy
SOCIAL AND HEALTH IMPACTS		
Renovation/Rehabilitation phase		
Noise	▪ Disturbance to the local communities from noise and vibration of civil works	▪ Schedule work periods to avoid working hours ▪ Use appropriate well serviced equipment to reduce noise output
Health and Safety	▪ Exposure to health and safety risks for the site workers and local residents	▪ Ensure that workers wear necessary PPEs ▪ Provide first aid on site ▪ Provide firefighting equipment and prepare and comply with basic EHS requirements
Public Health	▪ Contamination risk by HIV from the labour force; ▪ Transmission of diseases; ▪ Allergy resulting from chemical inhalation e.g. from paints, lubricants, fuels etc.	▪ Provide air/ventilation vents for better air ▪ Provide portable water for flashing of toilets after use ▪ Provide soap for washing of hands ▪ Collect, transport and dispose debris properly ▪ Ensure that latrines have close fitting lids
Disruptions of utility services	▪ Temporary disruptions of utility services such as electricity and water	▪ Schedule work periods to avoid working hours
Traffic	▪ Increased human traffic	▪ Schedule work periods to avoid working hours
Operation phase		
Health and Safety	▪ Risk of fire after completion	▪ Ensure that necessary PPE's, and fire extinguishers are in place.
Public Health	▪ Improper use of sanitary facilities which could attract pests and diseases	▪ Ensure that latrines have close fitting lids

ES 4 Institutional Capacity for the Implementation of the ESMF

The institutions and their implementation schedules are seen below:

Institution	Tasks/Activities
Federal Level Institutions	
National Project Coordination Unit (NPCU)	The coordination and facilitation of sub project activities in the participating states which includes the renovation and rehabilitation of existing institutions.
Federal Ministry of Environment (FMEnv)	Role of lead environmental regulator, overseeing compliance requirements, granting consent and also monitoring or providing supervisory oversight for SLOGOR project activities.
State Level Institutions	
State Project Coordinating Unit (SPCU)	Day-to-day oversight of operations, compliance with procedures and relations with the NPCU; The designated Environmental and Social safeguards consultant in the State Project Coordinating Unit will be responsible for the implementation of the ESMF and the recommendations contained in the safeguard instrument if required.
State Ministry of Environment, EPA's/ Waste Management Authorities	Enforcement of all environmental legislations in the states
Project Committees	
State Steering Committees (SCC)	Review the implementation of the State subproject activities
State Technical Committees (STC)	Review the technical progress of components, provide quality assurance to the work of consultants and AEA's and discuss and resolve cross agency technical issues
World Bank	
World Bank	Review, approve and clearance of ESMPs; Monitoring state committees

ES 5 Stakeholder Consultation

In accordance with World Bank safeguards policy 4.01 governing EA Category B projects, the GoN recognizes that stakeholder consultation is an important element of the SLOGOR project and the EA process. However, a summary of the consultations/proposed interventions are summarized as follows:

State	Summary of consultation
FCT Abuja	▪ The first- level consultation was done at the National Project Coordinating Unit (NPCU), Abuja on April 3, 2013 at National Planning Commission. ▪ The focus of the consultation was to identify stakeholders in the participating states.
Anambra	▪ The meeting was held in Awka on May 2, 2013 and subsequent communication ensued via telephone and email. ▪ The SPCU raised concern on the need for renovations and rehabilitation of SLOGOR office section within the civil service secretariat as well as upgrade of office equipment. These would involve minor civil works. ▪ Project officers noted that project activities/execution would have no discernable environmental and social impact therefore, there are no likely challenges concerning environmental management of project operations;
Cross River	▪ The meeting was held in Calabar on April 29, 2013 and subsequent communication ensued via telephone and email. ▪ The need to scale up the public sector finance reforms to the 18 LGA's was emphasised as the team would want a state wide intervention. ▪ Concerns over the rehabilitation of The Management Development Institute (MDI), the office of the auditor general were raised including training of both state and local government staff
Osun	▪ The meeting was held in Osogbo on May 6, 2013 and subsequent communication ensued via telephone and email. There were concerns about the great lapse during budget preparation which makes the budget higher than the state's IGR. ▪ The gap in ICT capacity and internal audit within civil servants was raised. ▪ Lack of depth in the public procurement process was highlighted. ▪ Need for building capacities among project staff was highlighted by the PS Finance.

	▪ Wastes are disposed through controlled tipping and are recycled; ▪ Inadequate funding and cultural practices are challenges concerning environmental management of project operations.
Kano	▪ The meeting was held in Kano on April 29, 2013 and subsequent communication ensued via telephone and email. ▪ There is an on-going reform within the state in conjunction with the Federal Government in line with the new budget code as well as E-payment in public and private transactions. ▪ Existing office to accommodate project staff need rehabilitation as well as in the LGA's ▪ Inadequate vehicles to reach out to rural areas, inadequate public advocacy equipment, low level awareness on environmental issues by the public and low level of understanding of risk and vulnerability are the challenges concerning environmental management of projects operations ▪ Government is responsible for solid waste management
Jigawa	▪ The meeting was held in Dutse on May 2, 2013 and subsequent communication ensued via telephone and email. ▪ Existing office to accommodate project staff need rehabilitation. These will also be extended to the 5 emirate councils: Hadeja, Dutse, Rimgim, Gumel and Kazaure. ▪ Solid Waste management is handled by government through JISEPA as well as private agencies. Solid wastes are disposed largely through the use of barrow pits; ▪ The project does not envisage any negative environmental impact as project output is largely on governance reforms and capacity of public expenditure and financial management issues; ▪ There is need for environmental training and awareness
Yobe	▪ The meeting was held in Damaturu on April 30, 2013 and subsequent communication ensued via telephone and email. ▪ The need for a guide to implement procurement, accounting and M&E processes as well as concerns on how to assess the effect and impacts on reform processes were discussed. ▪ Concerns on the ability of LGAs of procuring and tendering were noted. Thus, linking local Government accounts to state government accounts to improve reforms in terms of accounting and auditing were buttressed. ▪ The provision of IT centres in at least each local government to form the linkage in financial reforms to the state with minor rehabilitation works was not left out. ▪ Government is responsible for solid waste management. Solid waste management is major concern as wastes are disposed off in the open and or incinerated. ▪ Lack of enlightenment and poor mobilization as well as the general and poor approach by the public against environmental issues are the challenges concerning environmental management of projects operations.

ES 6 Indicative cost estimate and responsibility for implementing the ESMF Instruments

The table below shows a budget breakdown and responsibility of the cost for implementing the ESMF instruments.

Item	Responsibility	Cost Breakdown	Cost Estimate in Nigerian Naira (N)	Cost Estimate in Us Dollars (US$)
Mitigation	NPCU/SPCU/ State's Ministry of Environment/EPA		25,600,000	160,000
Management	NPCU/SPCU/EPAs	5% of Mitigation Cost	1,280,000	8,000
Capacity Building	NPCU/SPCU/ Consultants/State's EPA	25% of Mitigation Cost	6,400,000	40,000
Monitoring	NPCU/SPCU/State's EPA	25% of Mitigation Cost	6,400,000	40,000
Sub- Total			39,680,000	248,000
Contingency		10% of Sub- Total	3,968,800	24,800
Total			**43,668,000**	**272,800**

The total cost for implementing the ESMF is estimated at **Two Hundred and Seventy Two Thousand and Eight Hundred US Dollars only ($272,800)**.

CHAPTER ONE: INTRODUCTION

1.1 Background

The Federal Government of Nigeria has received a technical assistance loan from the World Bank to support the State and Local Governance Reform (SLOGOR) project operating in states of Anambra, Osun, Cross River, Kano, Jigawa and Yobe.

The project is consistent with the development objectives of the current administration's Vision 20-2020, State Economic Empowerment and Development Strategy (SEEDS) and other state development strategies. It also contributes to the higher level objectives expressed in the second Nigeria Country Partnership Strategy (CPII) of the World Bank, the Nigeria Country Strategy Paper and national Indicative Programme, 2008-2013 of the EU, the African Development Bank (AfDB), UK Department for International Development (DfID) and United States Agency for International Development (USAID).

Good governance improvements are expected to lead to transparency, accountability, effective performance of the public sector and invariably, increased service delivery in each participating state. Specifically, the project is expected to achieve the following results across the six states:

- Improved quality and transparency in the use of public funds
- Improved accounting, financial reporting and effectiveness of personnel payroll controls;
- Improved revenue collection efficiency;
- Improved value for money in the procurement of public goods and services
- Development of a road map for devolution of functions and authority to local governments

1.2 Overview of project components

The program which span up to five year, is to be achieved through four components;

- Component A: Public Financial Management Reforms
- Component B: Support to local governance
- Component C: Project Coordination
- Component D: Supervision of Trust Fund activities

1.3 Rationale for an Environmental and Social Management Framework (ESMF)

The World Bank's Operational Policy (OP) 4.01 when triggered, requires that an Environmental and Social Management Framework (ESMF) be prepared which will establish a mechanism to determine and assess future potential environmental and social impacts of project investments and set out mitigation, monitoring and institutional measures to be taken during design, implementation and operation of the subproject's activities to minimize negative environmental and social impacts to acceptable levels.

Sub-project activities in Component B of SLOGOR will involve activities that are likely to be associated with the renovation and rehabilitation of existing institutions. These activities could potentially lead to negative environmental and social impacts, which must be mitigated in accordance with World Bank Operational Policy 4.01 (Environmental Assessment) in order to ensure environmental and social sustainability.

However, at this stage the exact sub-project's locations and/or designs are yet to be determined, therefore the appropriate EA instrument to be used is the ESMF. The ESMF provides general environmental and social policies, guidelines and best practices to be integrated into the implementation of the World Bank supported SLOGOR project.

1.4 Objective of the ESMF

The primary goal of this ESMF is to improve decision making and to ensure that the design, construction, expansion, upgrading or rehabilitation of existing institutions being considered under the proposed project are undertaken in an environmentally sound and sustainable manner. The secondary goal is to ensure that in-country capacity, regulatory framework; principles and procedures are established to provide a basis for environmental assessments of all sub-projects to be carried out under this restructured project. This ESMF covers six states in the project namely: Anambra, Cross River, Osun, Ekiti, Kano, Jigawa and Yobe. This ESMF will be accordingly updated, reviewed and cleared prior to re-disclosure country wide in Nigeria and InfoShop.

More specifically, the purpose of the ESMF is to:

- Assess the potential environmental and social impacts of the sub-projects (rehabilitation, up-grading, or new constructions), whether positive or negative and propose mitigation measures;
- Inform the project preparation team and the Nigerian Government of the potential impacts of different anticipated sub-projects and relevant mitigation measures and strategies;
- Establish clear directives and methodologies for the environmental and social screening of sub-projects to be financed by the project; and
- Identify potential environmental policies, legal and institutional framework pertaining to the project.

1.5 Study Approach and Methodology

The ESMF study was prepared in accordance with applicable World Bank safeguard policies and Nigerian environmental impact assessment guidelines. The phases of the study include:

- Literature review;
- Data Gathering;
- Reconnaissance Surveys and visits to potential sub-projects sites;
- Characterization of the baseline conditions;
- Identification of potential impacts;
- Identification of impact mitigation measures;
- Preparation of an Environmental and Social Management Plan; and
- Preparation of sub-project guidelines.

1.5.1 Literature Review

The approach was based on review of available literature and other strategic planning documents at the national and state level.
Documents consulted in the process of preparing the ESMF study include:

- The Project Appraisal Document (PAD);
- Project Concept Notes (PCN);
- The Constitution of the Federal Republic of Nigeria;
- General environmental management conditions for construction contracts;
- Federal and state environmental laws regulations, decrees, acts, policies and guidelines;
- The draft general environmental management conditions for construction contracts;
- World Bank Safeguards Policies
- Immediate past EU funded PFM project (Support to Reforming Institutions Programme) under the EU-FGN Country Strategy Paper and National Indicative Programme, 2002-2007.
- ESMF's prepared by other World Bank projects in other parts of the world e.g. State Governance Capacity Building (SGCB) Project and the State Employment and Expenditure for Results (SEEFOR) Project and other relevant documents

1.5.2 Data Gathering

Data on the details of internal (non-tax and tax) revenue, and the environmental management policies and regulations were sourced from different institutions, including federal and state ministries of economic planning and budget, internal revenue service and the federal and state ministries of environment. Information gathered was reviewed to obtain detailed descriptive, qualitative and quantitative data on the physical environmental, sociological, and economic laws, regulations, standards, and policies relating to the project. Subsequently, baseline data of the six visited participating states were reviewed.

In addition, environmental screening and scoping of the project's field of influence and activities were undertaken in line with the World Bank and federal ministry of environment guidelines.

1.5.3 Field Survey

Field visits/stakeholder consultations were made to the following states; Anambra, Osun, Cross River, Kano, Jigawa, and Yobe. During this activity, discussions were held with officials of SLOGOR and relevant selected ministries, departments and agencies (MDA's) which include offices and staff of Ministries of Budget, and / or Economic Planning, Finance, Local Government, Accountant General, Due Process/ Public Procurement, Board of Internal Revenue and State House of Assembly, as well as officials from 3 local Governments from each state who served the purpose of eliciting baseline data of the proposed project. All consulted were officials from the State Ministries of Environment and waste management authorities. (See Annex 5 for complete list).

Using the specific circumstances of each state visited, the particular technical operations of each state project coordinating unit, including related agencies such as environmental protection agencies/authorities were studied, their capacity to implement the proposed environmental and social management process and mitigation measures was assessed, and discussions held to determine appropriate recommendations for improvement in service delivery, mitigation, monitoring, institutional requirements and their training and capacity building needs.

CHAPTER TWO: DESCRIPTION OF SLOGOR

2.1. Context and Objectives of SLOGOR

To better understand the issues and challenges in governance and Public Finance Management (PFM) in the six participating states which relies on a number of analytical works, including state level Public Expenditure Review (PERs), Public Expenditure and Financial Accountability Review (PEFA), and Public Expenditure Management and Financial Accountability Review (PEMFAR) that have been undertaken in participating states in the last four years. These studies and formulation study undertaken for this project in 2010 highlight a number of challenges and vulnerabilities in Public Finance Management in the six participating states through varying degrees. In the reports of the PEFA studies conducted in the six states in 2011, it is evident that the challenges in PFM cut across the six main dimensions of the PEFA Performance Measurement Framework namely (i) Credibility of the budget, (ii) comprehensiveness and transparency, (iii) policy based budgeting, (iv) predictability and control in budget execution, (v) accounting, recording and reporting, and (vi) external scrutiny and audit.

2.2 Project Development Objective (PDO)

The project development objective is to improve transparency, accountability and quality in the public finance management, with a view to strengthening governance in the participating states.

2.3 Project Components

The project is designed around four components which include:

Component A: Public Financial Management Reforms ($42.05 million)

This component aims to develop and modernize the Public Finance Management (PFM) systems of participating states, with an objective of improving its efficacy and quality in managing public financial resources. To enhance the quality of public expenditure in states, the component will support fiscal planning and standardization of PFM procedures, processes and reporting among participating state governments for consistency with the federal government. Summary of activities includes:

- Review of existing financial management legislation and regulations, drafting of new legislation and regulations were necessary, and organisation of sensitization seminars on public finance reforms;
- Strengthen budget execution, institution of multi- year budget frameworks, and institutions for budgeting in the public service; review and modernization of the accounting and financial reporting system and revenue and expenditure forecasting;
- Review and restructuring of the office of the state auditor-general, consolidation of the state external audit function and capacity building for members of the public accounts committee of the state legislature.
- Support the development of social accountability mechanisms in key areas such as planning, budgeting and public procurement, which will involve the public in the oversight for use of public resources.
- Review and strengthen systems of control and functionality in public financial management with support to state integrated financial management information systems (SIFMIS) in states that are assessed to be capable of implementing SIFMIS;
- Review and strengthening of public procurement processes and practises; institutions and engagement with civil society; and strengthening of state tax administration in participating states;
- Strengthening training provision, personnel and payroll systems to minimize abuse and redirect potential savings to improve services. Specific activities include the conduct of a

thorough assessment of existing skills and training needs of Ministries, Departments and Agencies (MDAs); targeted short to medium term trainings, provision of logistic support and development of service standards for selected MDAs and modernization of personnel records in each state's public service; and

The PFM component will mainstream independent monitoring into budget, procurement, audit and other PFM activities. Activities under this component are in line with the follow-up action plans in the reports of the 2011 PEMFAR in the six participating states. The PFM component will coordinate with other development partners' support in the participating states where applicable (DFID's SPARC in Kano and Jigawa states).

Component B: Support to local governance ($5.28 million)

Activities foreseen under this component include: (i) support each state to carry out studies on devotion of authority to local Government (LGs) or groups of Local Governments, disseminate and validate the outcome of these studies organised across each state (ii) provide technical assistance to each state government to develop and implement a road map for devolution of authority by state government to selected agencies responsible for local governance; (iii) review curricula along the training policy re-defined needs and (iv) strengthen in each state , 3 Local Governments, the Office of Auditor General for Local Governments and Ministry of Local Governments in the areas of accounting, auditing budgeting procurements, tax administration and M&E. There is no direct linkage between components A and B of the project. Whereas Component A plans to support the modernisation of the processes and systems of public finance management at the state level; Component B will provide limited support for budget planning and monitoring in selected local government and agencies responsible for service delivery at local government level. There is no plan to replicate state level PFM activities at the local government level; it is not feasible to do considering the wide disparity between the conditions of public finance management at these two levels of government across the participating states. Secondly, activities foreseen under Component B will depend on each government's willingness and initiative to develop a road map for devolution of functions to local governments; even where such road map is developed in each state through support from the project, the adoption of the road map by each state government is crucial for achieving the results of this sub-component. Therefore e the expected results for components A and B are divergent and may not impact on each other.

Component C: Project Coordination ($14.21 million)

This component will provide technical and logistical support required for the coordination of the project both at the federal and state levels. At the federal level, a National Project Coordination Unit (NPCU), located at the National Planning Commission (NPC) will be responsible for : providing technical and quality assurance support to states based on need and/or request; monitoring implementation progress and producing an annual progress report; coordinating, consolidating and circulating information from various states and facilitating knowledge sharing; coordinating mid-term reviews and post-evaluations, for each state, providing technical support on procurement, financial management, monitoring and evaluation activities; The NPCU will also carry out selected number of priority and relevant cross-state studies, including baseline studies on social and macro-economic indicators in the states, to be agreed with IDA at the beginning of project implementation. For effective project management, the NPCU will completely engage a full time Project Manager and Procurement Officer to be supported by a team of consultants on public finance management and procurement who will be engaged on a needs basis to provide technical support and quality assurance to the states. At the state level, a State Project Coordination Unit (SPCU) will be established, responsible for the day-to-day project management and monitoring (i.e. collate annual work programs, budgets, procurement plans etc based on inputs from the Activities Executing Agencies (AEA's), prepare semester progress reports, provide technical support to AEA's on procurement, M&E etc.). It will be headed and

managed by a full-time and experienced Project Coordinator (PC) with the rank of Director in the Civil Service or equivalent.

Component D: Supervision of Trust Fund activities

This component will provide funding for operational costs incurred by the Bank in implementing the project activities. Such costs include: operational costs for the recruitment of additional staff (two term staff and other short-term consultants) for the World Bank' operational costs in the form of travel expenses incurred by relevant World Bank Staff (including the STC) in supervising TF activities and travel expenses to accompany state officials on study tour on needs basis; and expenses incurred for knowledge sharing, i e. Workshops and the like; and for the implementation completion report, at the end of the project.

2.4 Purpose of the Safeguards Policies

The project will comply with the World Bank Safeguard Policies and applicable Federal, State and local laws of Nigeria.

The World Bank Safeguard Policies are as follows;

1. Environmental Assessment (OP4.01)
2. Natural Habitats (OP 4.04)
3. Forests (OP 4.36)
4. Pest Management (OP 4.09)
5. Physical Cultural Resources (OP 4.11)
6. Indigenous Peoples (OP 4.10)
7. Involuntary Resettlement (OP 4.12)
8. Safety of Dams (OP 4.37)
9. Projects on International Waters (OP 7.50)
10. Projects in Disputed Areas (OP 7.60)
11. Public Disclosure (BP 17.50)

A complete description of the safeguard policies and their triggers can be found on the World Bank's official web site *www.worldbank.org* and summarized in Annex 1.0

2.4.1 Safeguards Policies Triggered by SLOGOR Project

1. Environmental Assessment (OP4.01)

- **Environmental Assessment (OP4.01, BP 4.01, GP 4.01)**
  OP 4.01 (Environmental Assessment) is triggered under component B in which sub-project activities that are likely to be associated with the renovation and rehabilitation of existing institutions that have negative impact on the environment. The World Bank undertakes environmental screening of each proposed project to determine the appropriate extent and type of EA process required in order to avoid adverse impacts, or mitigate them where avoidance is not possible.

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CHAPTER THREE: DESCRIPTION OF PROJECT ENVIRONMENT

3.1 Project Area and Location

The Federal Republic of Nigeria is situated in West Africa lying between latitudes 4°00 N and 14°00N and longitudes 2°500 W and 14°45 E, bordered to its south by the Gulf of Guinea for about 850km, by the Republic of Benin to the West for 773km, Republic of Niger to its North for 1497km, Chad at its North Eastern Boundary (water boundary) for 87km and Cameroon to its East for 1,690km.

Kano and Jigawa states are located in the north-west zone of Nigeria; Yobe in the North East zone of Nigeria; Cross River state is located in the south -south part of Nigeria; state of Osun in the south-west of Nigeria and Anambra state in the south-east part of Nigeria (Figure 3.1)

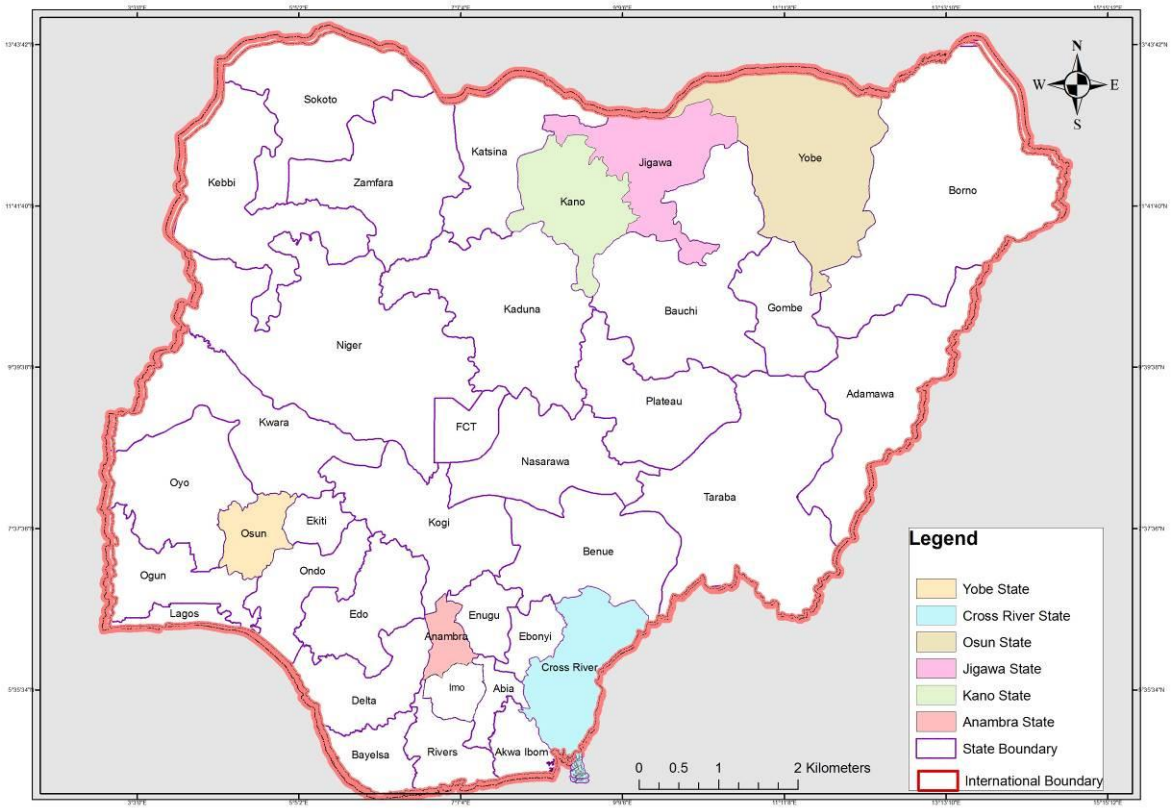


Figure 3.1: Map of Nigeria showing project states

3.2 Description of Anambra State

3.2.1 History

The original Anambra State was created in 1976 when East Central State was broken into Anambra and Imo States. Then it comprised the present Anambra State and Enugu State including the Abakaliki part of Ebonyi State, with Enugu as its capital. The state derives its name from the Anambra River, the largest, most southerly, left bank tributary of the River Niger with a total land area of 4,416 sq. km, Anambra State, situated on a generally low elevation on the eastern side of the River Niger, shares boundaries with Kogi, Enugu, Imo, Abia, Rivers, Delta and Edo states.

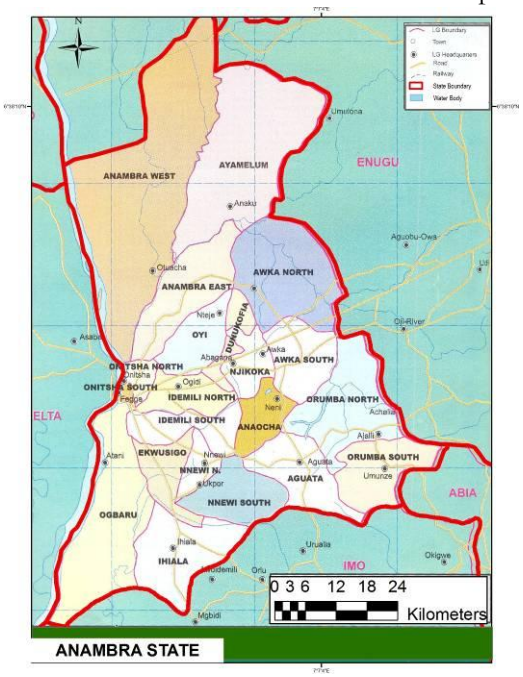


Figure 3.2: Map of Anambra State

3.2.2 Local Government Areas

There are 21 local government areas in the state. These include: Aguata, Awka North, Awka South, Anambra East, Anambra West, Anaocha, Ayamelum, Dunukofia, Ekwusigo, Idemili North, Idemili South, Ihiala, Njikoka, Nnewi North, Nnewi South, Ogbaru, Onitsha North, Onitsha South, Orumba North, Orumba South and Oyi

3.2.3 Resources

Anambra is rich in natural gas, crude oil, bauxite, ceramic and has an almost 100 percent arable soil. Anambra state is a state that has many other resources in terms of agro-based activities like fishery and farming, as well as land cultivated for pasturing and animal husbandry.

3.2.4 Population

The state is one of the most densely populated states in Nigeria. According to the 2006 National population census, Anambra State has a population of of 4,177,828 million persons, made up of 2,117,948 million males and 2,059,844 million females.

3.2.5 Environmental Issues

The main ecological hazards in the state are accelerated gully erosion and flooding. Extensive forest clearing, often by bush burning, and continuous cropping with little or no replenishment of soil nutrients, resulted in the disruption of the ecological equilibrium of the natural forest ecosystem. Such a situation in a region of loosely consolidated friable soils is prone to erosion, giving rise to extensive gully formation.

3.3 Description of State of Osun

3.3.1 History

State of Osun is an inland state in south-western Nigeria. Its capital is Osogbo. It is bounded in the north by Kwara State, in the east partly by Ekiti State and partly by Ondo State, in the south by Ogun State and in the west by Oyo State. The modern Osun State was created in 1991 from part of the old Oyo State. The state's name is derived from the River Osun.

Figure 3.3: Map of Osun State

3.3.2 Local Government Areas

The state is divided into three federal senatorial districts, each of which is composed of two administrative zones. Osun State's 30 Local Government Areas are listed below with their headquarters in parentheses: Aiyedaade (Gbongan), Aiyedire (Ile Ogbo), Atakunmosa East (Iperindo), Atakunmosa West (Osu), Boluwaduro (Otan-Ayegbaju), Boripe (Iragbiji), Ede North (Oja Timi), Ede South (Ede), Egbedore (Awo), Ejigbo (Ejigbo), Ife Central (Ile-Ife), Ife East (Oke-Ogbo),Ife North (Ipetumodu), Ife South (Ifetedo), Ifedayo (Oke-Ila Orangun), Ifelodun (Ikirun), Ila (Ila Orangun), Ilesa East (Ilesa), Ilesa West (Ereja Square), Irepodun (Ilobu), Irewole (Ikire), Isokan (Apomu), Iwo (Iwo), Obokun (Ibokun), Odo Otin (Okuku), Ola Oluwa (Bode Osi), Olorunda (Igbonna, Osogbo), Oriade (Ijebu-Jesa), Orolu (Ifon-Osun), Osogbo (Osogbo)

3.3.3 Population

According to the 2006 National population census, State of Osun has a population of 3,416,959 million persons, made up of 1,734,149 million males and 1,682,810 million females.

3.3.4 Investment Opportunities

Yam, Maize, Cassava, Millet, Plantain and Rice are the major cash crops in the State. Lumbering and the growing and marketing of cocoa and kolanut are carried out on a large scale. The living spring minerals promotion Co.Ltd, formed with the backing of the government of Osun state is involved in mining activities in various parts of Nigeria.

3.3.5 Environmental Issues

Environmental problems includes flooding, erosion, water and air pollution, soil degradation, rain storms, solid wastes and communicable health related problems.

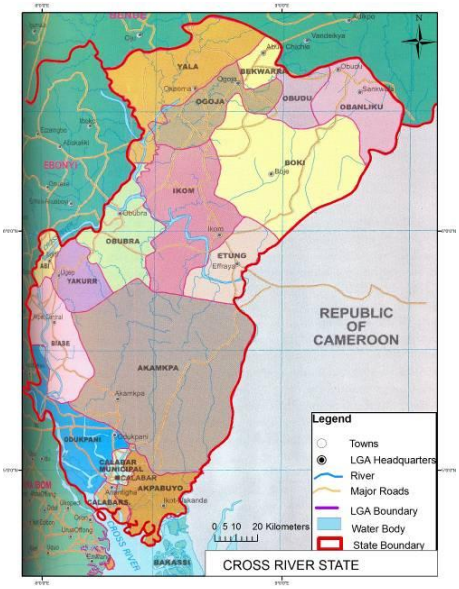


Figure 3.4: Map of Cross River State

3.4 Description of Cross River State

3.4.1 History

Cross River State is a coastal state in South Eastern Nigeria, created in May 1967 from the former Eastern Region. The State which occupies 20,156m² is located on latitude 05^0 53.083'N and longitude 8^0 8.25'E, and shares boundaries with Benue State in the north, Enugu and Abia States to the west, Cameroon Republic to the east and Akwa-Ibom and the Atlantic Ocean to the south.

3.4.2 Local Government Areas

Cross River State is divided into 18 Local Government Areas. They are: Abi, Akamkpa, Akpabuyo, Bakassi, Bekwarra, Biase, Boki, Calabar Municipal, Calabar South, Etung, Ikom, Obanliku, Obubra, Obudu, Odukpani, Ogoja, Yakuur, Yala.

3.4.3 Population

Cross River State has a total population of 2,888,966 million persons (2006 population census) made up of 1,492,565 million males and 1,421,021 million females spread across the 18 local government areas

3.4.4 Resources

Cross River State is one of the most richly endowed agricultural lands in Nigeria. Forestry accounts for about 22.4 percent of the total land areas. The state also has great potential for marine fisheries and freshwater aquaculture as well as metallic minerals.

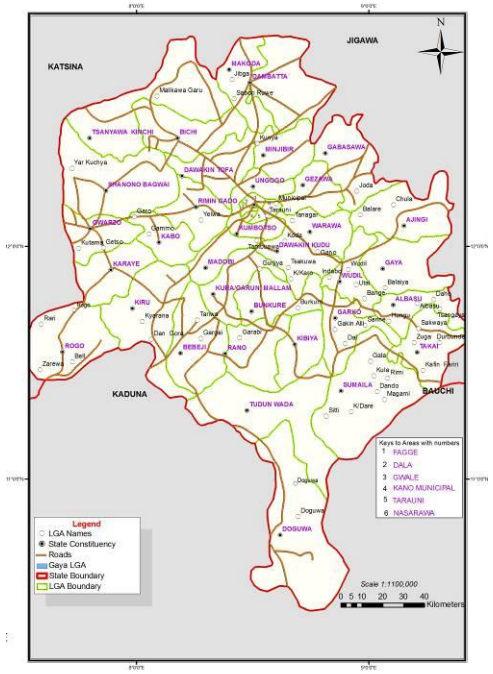
3.4.5 Environmental Issues

As in most part of Southern Nigeria, the major environmental problems are soil degradation, urban air and water pollution, and rapid urbanization.

3.5 Description of Kano State

3.5.1 History

Kano state was created in July 1967 out of the defunct Northern region. The state has a location advantage as the centre of commerce and terminus of trade with some African regions as well as the Arab world. It is located between Latitude 12^0 40' and 10^0 30' and longitude 7^0 40' and 9^0 30'.



3.5.2 Economy

Historically, Kano State has been a commercial and agricultural state, which is known for the production of groundnuts as well as for its solid mineral deposits. The state has more than 18,684 square kilometers (7,214 sq mi) of cultivable land and is the most extensively irrigated state in the country

It is the second largest state in terms of commercial activity within Nigeria and the second most populous state in the country. Kano also has traditionally received the largest proportion of centrally collected (mostly oil) revenues. From 1990- Figure 3.5: Map of Kano State 96 Kano received 10.9% of allocated revenue

3.5.3 Population

According to the 2006 national Population and housing Census conducted throughout the country, Kano was rated as the most populated State in the federation with a population of 9,401,288 million persons (4,947,952 males and 4,453,336 females).

3.5.4 Environmental Issues

The major environmental problems are soil degradation, rapid deforestation, urban air and water pollution, gully erosion, Slop wash, desertification, loss of arable land and rapid urbanization.

3.6 Description of Jigawa State

3.6.1 History

The state was created on Tuesday August 27, 1991, Excised from Kano State, it covers a total land area of about 22,410sq Km. It is bordered on the West by Kano State, on the East by Bauchi and Yobe States and on the North by Katsina States and the Republic of Niger.

3.6.2 Local Government Areas

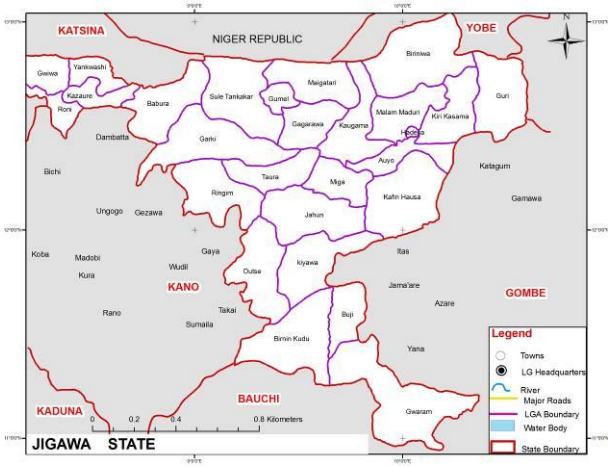


Figure 3.6: Map of Jigawa State

Jigawa State has 27 LGAs namely: Auyo, Babura, Biriniwa, Birnin Kudu, Buji, Dutse, Gagarawa, Garki, Gumel, Guri, Gwaram, Gwiwa, Hadejia, Jahun, Kafin Hausa, Kaugama, Kazaure, Kiri Kasama, Kiyawa, Maigatari, Malam Madori, Miga, Ringim, Roni, Sule Tankarkar, Taura and Yankwashi

3.6.3 Population

According to the 2006 census, the State has a total population of 4,348,649 million inhabitants which comprises of 2,198,076 males and 2,162,926 females.

3.6.4 Political economy

This is largely characterized by informal sector activities with agriculture as the major economic activity. Over 80% of the population is engaged in subsistence farming and animal husbandry. Trade and commerce are undertaken on small and medium scale, especially in agric goods, livestock and other consumer goods. Other informal sector activities include blacksmithing, leather-works, tailoring services, auto repairs, metal works, carpentry, tanning, dyeing, food processing, masonry etc.

3.6.5 Environmental Issues

The major ecological problems in Jigawa state are drought, desertification and the menace of soil and wind erosion. The sparse vegetation renders the bare surface deposits very susceptible to erosion. Gullies are rampant, resulting in soil removal from farm lands and the collapse of roads, bridges and other structures. The other ecological hazard, desertification, is more pronounced in the northern fringes of the state.

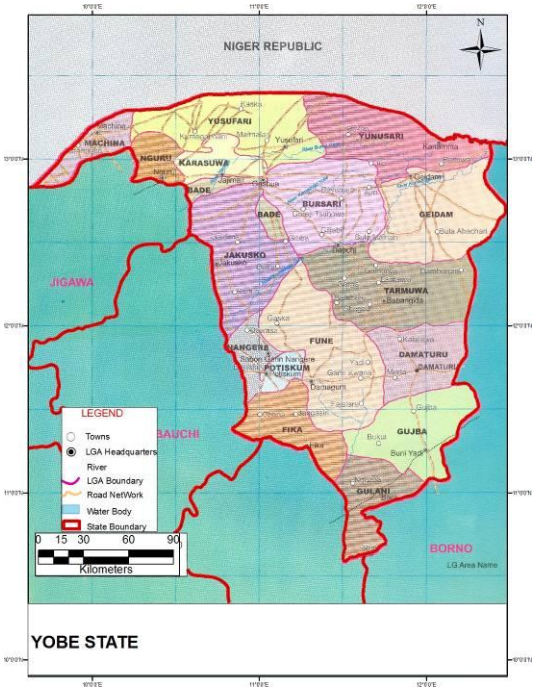


Figure 3.7: Map of Yobe State

3.7 Description of Yobe State

3.7.1 History

Yobe State was created on the 27th of August, 1991. The State covers an estimated area of 47,153 Square Ki1ometres and share International Border with the Republic of Niger to the North. The State also share borders with Jigawa, Bauchi and Gombe States to the West, Borno to the East as well as Gombe and Borno States to the South.

3.7.2 Local Government Areas

Yobe State consists of 17 local government areas, or LGAs. They are: Bursari, Damaturu, Geidam, Bade, Gujba, Gulani, Fika, Fune, Jakusko, Karasuwa, Machina, Nangere, Nguru, Potiskum, Tarmuwa, Yunusari, Yusufari

3.7.3 Population

According to the census conducted by the National Population Commission in November 2006, Yobe State has an estimated population of 2,321,339 million persons comprising of 1,205,034 males and 1,205,034 females.

3.7.4 Economy

Potash which is a basic raw material for soap production is found in commercial quantity in the northern parts of the state. Gum Arabic of high grade is also available especially in Bursari, Tarmuwa and Damaturu Local Government Areas of the state. Equally, produced in commercial quantities are cotton, Groundnuts, and Beans. In the chemical and mineral sector, Gypsum is found in commercial quantity in Fika, Gujba and Fune Local Government areas, Diatomite and Limestone also in Gujba while the presence of substantial deposit of Kaolin, and Quartz have been confirmed in the other parts of the state. The state is also the largest supplier of livestock.

3.7.5 Environmental Issues

The increasing incidence of desertification is the most disturbing ecological problem. Wind erosion is found to aggravate the problem by creating sand dunes in the northern parts of the state, especially in Yunusari, Yusufari, Geidam, Nguru and Machina areas. Today, the lives of the people living in these areas are seriously threatened such that the trend in migration is southwards. The poor management of the fragile land resources through deforestation, overgrazing, over cultivation, bush burning, and adverse climatic conditions are identified as some of the factors responsible for the growing menace of desert encroachment.

CHAPTER FOUR: ENVIRONMENTAL POLICY AND REGULATORY FRAMEWORK

This section presents an overview of applicable national and international policies and regulations that guides the ESMF of SLOGOR project in addition to an assessment of the institutional framework for the implementation of the project.

The major national policies and regulations that are considered relevant to the project are summarized in this section.

4.1 National Policies

4.1.1 National Policy on the Environment (1988)

The National Policy on the Environment aims to achieve sustainable development in Nigeria, and in particular to:

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

4.2 Regulatory Framework

4.2.1 Federal Legislation

Federal Environmental Protection Agency Decree No 58 (1988)

The Federal Environmental Protection Agency (FEPA) was established by Decree No. 58 of 1988 and charged with the responsibility for environmental protection. Following the upgrading of the agency to a Federal Ministry of Environment (FMEnv) in January 2007, the Ministry was mandated to coordinate environmental protection and natural resources conservation for sustainable development.

FMEnv has developed statutory documents to aid in the monitoring, control and abatement of industrial waste. These guidelines stipulate standards for industrial effluent, gaseous emissions and hazardous wastes. Table 4.1 summarizes the existing regulations applicable to environmental protection while Table 4.2 presents a list of proposed legislations.

Table 4.1: Existing National Environmental Protection Regulations

S/N	Regulations	Year	Provisions
1	National Environmental Protection (Effluent Limitation) Regulations	1991	The regulation makes it mandatory for industrial facilities to install anti-pollution equipment, makes provision for effluent treatment and prescribes a maximum limit of effluent parameters allowed.
2	National Environmental Protection (Pollution and Abatement in Industries in Facilities Producing Waste) Regulations	1991	Imposes restrictions on the release of toxic substances and stipulates requirements for monitoring of pollution. It also makes it mandatory for existing industries and facilities to conduct periodic environmental audits.
3	National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations.	1991	Regulates the collections, treatment and disposal of solid and hazardous wastes from municipal and industrial sources.
4	Harmful Wastes (Special Criminal Provisions etc) Decree No. 42	1988	Provides the legal framework for the effective control of the disposal of toxic and hazardous waste into any environment within the confines of Nigeria
5	Environmental Impact Assessment Act (Decree No. 86).	1992	The decree makes it mandatory for an EIA to be carried out prior to any industrial project development
6	National Guideline and Standard for Environmental Pollution Control	1991	The regulations provide guidelines for management of pollution control measures.
7	Workmen Compensation Act	1987	Occupational health and safety
8	Urban and Regional Planning Decree No 88	1992	Planned development of urban areas (to include and manage waste sites)
9	Environmental Sanitation edicts, laws and enforcement agencies		General environmental health and sanitation. Enforcing necessary laws
10	State waste management laws		Ensure proper disposal and clearing of wastes
11	Public Health Law		Covering public health matters
12	National Guidelines on Environmental Management Systems (EMS)	1999	Recognizes the value of EMS to EIA and sets out objectives and guideline on general scope and content of an EMS
13	National Policy on the Environment	1989	The policy identifies key sectors requiring integration of environmental concerns and sustainability with development and presents their specific guidelines
14	National Guidelines and Standards for Water Quality	1999	It deals with the quality of water to be discharged into the environment, sets standards and discharge measures for for a wide range of parameters in water discharged from various industries. It also sets out the minimum/maximum limits for parameters in drinking water
15	National Environmental Standards and Regulations Enforcement Agency (NESREA)	2007	Established to ensure compliance with environmental standards, guidelines and regulations.

Table 4.2: List of Proposed Environmental Legislation

Nos	Regulation	Year
1	Waste Prevention and Recycling Bill	1999
2	Response, Compensation and Liability For Environmental Damage Bill	1999
3	Waste Prevention and Recycling Bill	2000
4	Federal Environmental Protection Agency (Amendment) Bill	2001
5	Pollution Abatement and Waste Generation Facilities (control) Bill	2001
6	Federal Environmental Protection Agency Bill	2003
7	Industrial Wastewater Pollution and Control Bill	2003
8	Environmental Managers Registration Council of Nigeria Bill	2003
9	Amendment of EIA Decree No. 86 of 1992 Bill	2005

4.2.2 State Environmental Protection Agencies (SEPA) Act

By virtue of Section 25 of the FEPA Act, States in Nigeria are given the power to set up their individual Ministries of Environment and Environmental Protection Authorities (SEPA). The following SEPAs laws were reviewed:

Table 4.3 SEPA Laws

State	SEPA Law
Anambra	Anambra State Ministry of Environment Law
Cross River	Cross River State Environmental Protection Agency law 1996 and Environmental Sanitation &Protection Task Force Law, 1984
Osun	Osun State Environmental Protection laws CAP 101, part 2 (Establishment, Functions and Powers of Osun State Environmental Protection Agency) section 10 sub-section (m)
Kano	Kano State Draft Environmental Protection Agency (KASEPA) Act 2011
Jigawa	Jigawa State Environmental Protection Agency Law
Yobe	Yobe State Environmental Protection Agency Law

4.2.3 National Air Quality Standard

The World Health Organization (WHO) air quality standards were adopted by the then Federal Ministry of Environment (FMEnv) in 1991 as the national standards. These standards define the levels of air pollutants that should not be exceeded in order to protect public health.

Table 4.4: National Ambient Air Quality Standards (NAAQS)

Air Pollutants	Emission Limits
Particulates	250 (ug/m3)
SO_2	0.1 (ppm)
Non-methane Hydrocarbon	160 (ug/m3)
CO	11 (ug/m3) or 10 (ppm)
NO_X	0.04-0.06 (ppm)
Photochemical Oxidant	0.06 (ppm)

Source: EPA, 1990

4.2.4 Land Use: (Land Use Act (1978)

This act provides a legal basis for land acquisition in Nigeria. The major provisions include:

- Section 1: all land comprised in the territory of each state in the Federation is vested in the Governor of the state and such land shall be held in trust and administered for the use and common benefit of all.
- Section 2: (a) all land in urban areas shall be under the control and management of the Governor of each State; and
- Section 2 (b) all other land shall be under the control and management of the local government within the area of jurisdiction in which the land is situated.

State governments have the right to grant statutory rights of occupancy to any person for any purpose; and the Local Government has the right to grant customary rights of occupancy to any person or organization for agricultural, residential and other purposes.

4.2.5 Workmen Compensation Act (1987)

The law provides for the payment of compensation to employees for injuries suffered in the course of their employment.

4.3 Assessment of the Policy and Regulatory Framework

The existing legal framework for environmental assessment in Nigeria is considered adequate. Detailed laws, regulations and guidelines have been developed and serve as the framework for environmental protection. The implementation has been poor due to poor enforcement.

4.3.1 Environmental Impact Assessment (EIA) Act

The Environmental Impact Assessment (EIA) Act does not encourage the participation of people whose lives are likely to be affected by a project; rather, it encourages the collection and documentation of technical information which is confusing to most people.

4.3.2. Federal Environmental Protection Agency (FEPA) Sectoral Guideline

FEPA's Guideline covering infrastructural projects deals with both the procedural and technical aspects of EIA for construction projects. The guideline stresses the need to carry out an EIA at the earliest stage possible. Infrastructure Project EIAs have been conducted in rather loose form, and often taken as a supplementary requirement to overall economic and engineering issues.

4.3.3 National Policy on Environment

The policy and its institutional arrangements have not yielded the desired results. This is principally due to weak enforcement; inadequate manpower in the area of integrated environment management; insufficient political will; inadequate and mismanaged funding; low degree of public awareness of environmental issues; and a top–down approach to the planning and implementation of environmental Programme.

4.4 International Environmental Agreements

Nigeria is also a signatory to the following relevant international conventions:

- Basel Convention on the control of hazardous wastes and their disposal
- Bonn Convention on conservation of Migratory Species
- Stockholm Convention on Persistent Organic Pollutants
- The African Convention on the Conservation of Nature and Natural Resources, The African Convention, 1968;
- The Convention Concerning the Protection of the World Cultural and Natural Heritage, The World Heritage Convention, 1972;
- The Convention on International Trade in Endangered Species of Wild Fauna and Flora, CITES, 1973;
- The Framework Convention on Climate Change, Kyoto Protocol, 1995;
- The Convention on Biological Diversity, 1992;
- The Convention on the Prevention of Marine Pollution by Dumping of Waste, MARPOL, 1972;

In addition, Nigeria also has obligations to protect the environment through various commitments to the African Union (AU), the Economic Community of West African States (ECOWAS) and the Commonwealth. It is also committed through relations with the European Community under the Lome IV Convention.

4.5 Institutional Framework

The framework for the EA of the SLOGOR project involves the following in conjunction with the implementing MDAs:

The following institutions and agencies are responsible for regulating and monitoring environmental issues, information and waste management standards applicable to the SLOGOR project.

4.5.1 Federal Ministry of Environment

The ministry in accordance with its mandatory functions will ensure that the project implementation conforms to the Environmental (Impact) Assessment Act 1992.

The Federal Ministry of Environment (FMEnv) has responsibility to administrate and enforce environmental laws in Nigeria. The specific responsibilities of the ministry include:

- Monitoring and enforcing environmental protection measures;
- Enforcing international laws, conventions, protocols and treaties on the environment

- Prescribing standards for and making regulations on air quality, water quality, pollution and effluent limitations, atmosphere and ozone protection, control of toxic and hazardous substances; and
- Promoting cooperation with similar bodies in other countries and international agencies connected with environmental protection.

4.5.2 State Ministries of Environment (SMoEnv) /Environmental Protection Agencies or Authorities (SEPA's)

The respective *SMoEnv* is charged with establishing guidelines and standards for the management and monitoring of the environment in their states. Furthermore, the ministry is responsible for managing environmental problems caused by or arose within the project areas of influence including waste management and environmental guidance.

Decree No. 58 of 1958, as amended by Decree No. 59 of 1992, which established FEPA, also issued a federal directive to the states to establish State Environmental Protection Authorities or Agencies

The broad functions of SEPAs include:

- Enforcement of all environmental legislations and policies;
- Coordination and supervision of environmental assessment studies;
- Minimization of impacts of physical development on the ecosystem;
- Preservation, conservation and restoration to pre-impact status of all ecological processes essential to the preservation of biological diversity;
- Protection of air, water, land, forest and wildlife within the states;
- Pollution control and environmental health in the states; and
- Co-operation with FMEnv and other agencies to achieve effective prevention of abatement of trans-boundary movement of waste.

Excerpts of the applicable state ministries of environment/environmental protection agencies are stated below:

- Anambra Ministry of Environment

The Ministry of Environment pursues the broad goals of environmental sustainability evidenced by safe, clean and green environment. Specifically, the following sub-goals are pursued.

  - Develop an effective and efficient waste management system
  - Develop an effective and efficient sanitation system and pollution control
  - Promote aggressive afforestation programme to achieve green environment
  - Promote inter-sectoral linkages to reduce environmental degradation
  - Promote the preservation and enhancement of the bio-diversity

- Osun State Ministry of Environment and Sanitation

The objectives and policy thrusts of the Ministry of Environment and Sanitation are to:

  - Formulate, monitor and evaluate government policy on environment;
  - Control and monitor all forms of environmental degradation and pollution
  - Conserve, protect and enhance the environment, the ecosystem and ecological process essential for preservation and development of both flora and fauna with a view to ensuring the richness of biodiversity;
  - Supervise and monitor and evaluate all projects by donor Agency relating to the environment;

- Cross River Ministry of Environment (Environmental Protection and Assessment Department-(EPAD)

  The mandate of the Environmental Protection and Assessment Department is to:
  - Ensure the environmental compliance and monitoring of companies in the state.
  - Demand for EIA (Environmental Impact Assessment).

- Monitor implementation of EIA's in line with procedural guidelines.-
- Ensure that EPAD projects and programmes are implemented and delivered as of when due.
- Ensure that environmental standards are maintained.
- Coordinate the review of EIA.
- Attend panel review exercise /public forum.

- Kano State Environmental Planning & Protection Agency (KASEPPA)

  KASEPPA was established by the state Edict No.15 of 1990. The functions of the agency are:
  - Urban centre planning;
  - Control of development in urban centers;
  - Granting of building, designing and construction permission;
  - Pollution control and abatement;
  - Provision of amenities, conveniences and infrastructures.

- Jigawa State Environmental Protection Agency (JISEPA)
  The functions of the agency are:
  - Ensure sustainable development of the Environment of the State.
  - Cooperate and collaborate with the federal, Local Governments and non-Governmental organizations, private sector and individuals on environmental matters.
  - Conserve, protect and enhance the environment, the ecosystem and ecological processes essential for the preservation of biological diversity.

- Yobe State Environmental Protection Agency (YOEPA)

  The functions of the agency are:
  - Collection and disposal of both wet and dry refuse (solid and liquid) including human waste. .
  - Control of industrial waste (liquid emission) and air pollution..
  - In consultation with FEPA ensure implementation and enforcement of FEPA's regulations in the state where applicable.
  - Collaborate with the FEPA in conducting public investigation of measure environmental pollution.
  - Cooperate with federal and state ministries, local government council's statutory bodies, research and educational institutions on matters related to environmental protection.
  - In collaboration with FEPA, conduct public investigation and pollution.

4.5.3 State Waste Management Authorities

Each of the states waste management authority will ensure that wastes resulting from the project are promptly collected and adequately disposed in the sites designated by the authority.

- Anambra State Waste Management Agency (ASWAMA)

  The Agency is charged with the following responsibility:
  - Clean the streets, remove, collect and dispose domestic, commercial and industrial waste.
  - Remove and dispose of carcass of dead animals from public places.
  - Prepare and update from time to time the master plans for waste collection and disposal in the cities, towns and villages of the state and control the resultant waste system within the state.
  - Approve and monitor all waste disposal systems in the state.
  - Issue, renew and revoke license of private waste collectors.
  - Make provision for waste management services to state agencies, local governments, industries, business entities and private persons within the state by receiving waste at the authority's facilities pursuant to the contract agreement between the authority and such other party.

- Osun Waste Management Agency (OSWA)
  The agency is charged with the following responsibility;

- Initiate, enforce and co-ordinate policies on statutory rules and regulations on solid waste collection and disposal, general environmental protection, flood control, regulations of all forms of pollution of the ecological system and all activities related thereto throughout the state.
- Prepare plans, designs, construct and supervise projects for solving ecological, waste management, and industrial pollution problems in the state.

The EIA duties is coordinated by a team of 5 persons, the committee is under the OSWAMA and the committee is acting for the agency according to Osun State environmental protection laws CAP 101 part 2 (establishment, functions and powers of Osun state environmental protection agency) section 10 sub section (m).The duties of the committee are:

The duties of the committee are:

- Inspection of project sites.
- Verification of all claims as contained in the EIA report, including random sampling for scientific /laboratory verification.
- Display EIA report for the public in strategic location and the local government headquarters of project location.
- Making necessary recommendations to the agency on its findings.
- Collaboration with other government agencies.

- Cross River Waste Management Unit
  - Collection and keeping of waste data bank.
  - Educate the public on waste data bank.
  - Ensure a clean and waste free environment.
  - Ensure proper waste treatment and disposal.
  - Ensure and monitor compliance on waste management and evacuation by companies..
  - Overseeing the activities of personal private practice contractors.
  - Monitor and ensure proper management of waste dumpsite.
  - Entertain complaints from the public on waste issues.

4.6 World Bank Safeguard Policies

SLOGOR project has been categorized as B implying that the expected environmental impacts are largely site-specific and that mitigation measures can be designed relatively readily. The environmental assessment for a Category B project usually:

- examines the project's potential negative and positive environmental impacts,
- recommends measures to prevent, minimize, mitigate, or compensate for adverse impacts, and
- recommends measures to improve environmental performance

The World Bank has 10 Environmental and Social Safeguard Policies (see Annex 1) to reduce or eliminate the adverse effects of development projects, and improve decision making. These operational policies include:

- OP/BP 4.01: Environmental Assessment
- OP/BP 4.04: Natural Habitats
- OP 4.09: Pest Management
- OP/BP 4.12: Involuntary Resettlement
- OP 4.10: Indigenous Peoples
- OP 4.11: Physical Cultural Resources
- OP 4.36: Forests
- OP/BP 4.37: Safety of Dams
- OP/BP 7.50: Projects on International Waters
- OP/BP 7.60: Projects in Disputed Areas

Plus 2

- OP/BP 4.00:Use of Country System
- OP/BP 17.50: Public Disclosure

The proposed project triggered the environmental assessment policy (OP.4.01). This document i.e. the ESMF is the appropriate instrument prepared to address the triggered environmental assessment policy.

OP 4.01 Environmental Assessment

The objective of OP 4.01 is to ensure that projects financed by the Bank are environmentally and socially sustainable, and that the decision making process is improved through an appropriate analysis of the actions including their potential environmental impacts. Environmental Assessment (EA) is a process whose breadth, depth, and type of analysis depend on the nature, scale, and potential environmental impact of the proposed project. EA takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples, and cultural property); and trans-boundary and global environmental aspects.

OP 4.01 is triggered in this project because some sub-projects will require minor civil works such as the renovation and rehabilitation of existing institutions and administrative offices. The impact is however expected to be site specific, moderate and reversible, hence, classified as a category B project based on World Bank EA screening guideline.

CHAPTER FIVE: POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

The positive and negative impacts associated with the implementation of SLOGOR sub-projects, methods for identifying impacts and subsequent processes to be carried out in the implementation of the EA after identification of negative impacts is examined. In order to determine the impacts of sub-projects, robust screening measures were put in place as follows:

5.1 Screening Process

The objective of screening is to determine the appropriate level of environmental and social impact assessment and management for a proposed subproject. Environmental and Social screening process distinguishes sub-projects and activities that will require thorough environmental review to prevent/mitigate negative environmental impacts or those which will provide opportunities to enhance positive impacts. Thus, one of the objectives of the screening process is to rapidly identify these subprojects, which have little or no environmental or social issues so that they can move to implementation in accordance with pre-approved standards or codes of practices for environmental and social management.

In other words, based on environmental screening, sub-projects with no noticeable impacts are cleared from an environmental perspective; subprojects with some impacts proceeds to another level of conducting an environmental assessment, which will be evaluated to clear the subproject.

5.2 Types of impacts considered under the SLOGOR project

Minor civil works associated with the renovation and rehabilitation of existing institutions is not expected to cause negative environmental impacts and any adverse long term impacts. The potential negative impacts are likely to be small in scope, site-specific, non-cumulative and easy to remediate. Based on the screening exercise of the proposed project activities, the potentially significant beneficial and adverse impacts were identified and are presented in this section. Table 5.1 describes the potential environmental and social impacts.

Table 5.1: Potential environmental and social impacts

POTENTIAL BENEFICIAL IMPACTS	
	ENVIRONMENTAL
Aesthetics and air quality	▪Cleaner air and aesthetics in the project area of influence
Occupational Health and Safety	▪Minimization in occupational health hazards
Performance and Governance	▪Improved environmental performance and governance
ESMP process	▪Increased efficiency in the ESMP process
	SOCIAL
Improved Public Finance Management	▪ Enhanced multi-year fiscal planning, expenditure policy and budgeting ▪ Timely auditing and reporting ▪ Effective and transparent public procurement management ▪ Transparency in personnel registry and payroll controls ▪ Effective tax registration and assessment measures ▪ Enhanced delivery of civil service training
POTENTIAL ADVERSE IMPACTS	
	ENVIRONMENTAL
	Renovation/Rehabilitation phase
Air quality	▪ Emission of dust and particulate matter leading to the reduction of air quality ▪ Air pollution from burning of renovation waste e.g. wood, scrap materials, paper ▪ Emission of pollutants from light machinery
Water quality	▪ Wastewater spills or run-off but with little or no adverse effect on the immediate environment ▪ Potential pollution of nearby surface water or ground water though runoff of pollutants e.g. lubricating oil, paint etc from workshop areas etc
Soil quality	▪ Point source contamination around workshop areas ▪ Deterioration of soil characteristics due to increased contamination from cement, paints, lubricants, fuels and detergents

Noise Pollution	▪ Loud noise resulting from the use of equipment during renovation and rehabilitation works.
Flora and Fauna	▪ Contamination of biota ▪ Vegetation clearing resulting in loss of valuable habitat, species diversity and population levels.
Solid Waste	▪ Solid waste generated from demolition and rehabilitation activities containing potentially hazardous materials (e.g asbestos) ▪ Debris during renovation works piling
	Operation phase
Air quality	▪Air pollution from burning of waste generated from project operations e.g. scrap materials, paper
Waste water	▪Waste water run-off from improper waste management ▪Lack of water for sanitation or toilet facilities
Water and soil quality	▪Pollution from on-site sewage systems;
Solid Waste	▪Illegal dumping of solid waste in drains
	SOCIAL AND HEALTH IMPACTS
	Renovation/Rehabilitation phase
Noise	▪ Employees and communities exposed to high noise level
Health and Safety	▪ Exposure to health and safety risks for the site workers and local residents
Public Health	▪ Contamination risk by HIV from the labour force ▪ Transmission of diseases ▪ Allergy resulting from chemical inhalation e.g. from paints, lubricants, fuels et ▪ Air pollution from public latrines
Disruptions of utility services	▪ .Temporary disruptions of utility services such as electricity and water
Traffic	▪Increased human traffic
	Operation phase
Health and Safety	▪ Risk of fire after completion ▪ Occupational accident during rehabilitation period
Public Health	▪ Improper use of sanitary facilities which could attract pests and diseases

5.3 Environmental and Social Risk Prediction

This section describes how SLOGOR project impacts were assessed in order to determine the extent of its significance and further measures to be taken. Impacts with adverse high significance are a source of concern hence requires feasible and practical mitigation measures before it can attract Bank funding.

A summary of the project environmental and social risks based on project components and sub-project likelihoods is presented in Table 5.2. The impact of each activity is assessed qualitatively through the relevant environmental and social media which are:

In analyzing the impacts, three criteria were used:

- The Severity of the impact on the existing environment (High, Medium, or Low)
- The Likelihood of the impact occurring (High, Medium, or Low)
- The Effect of the impact, whether beneficial (+) or adverse (-)

Table 5.2: Environmental & Social Impact Prediction and Analysis of SLOGOR project

Activities	Environmental Media	Environmental Hazards/Issues	Severity	Likelihood	Effect		Social Media	Social Hazards/Issues	Severity	Likelihood	Effect
Building repairs: roof, lights, furniture, painting, etc	Air	Dust/PMs	N	L			Community Structure	None			
	Surface/Ground water	None					Livelihood	Possible employment for community members	L	M	+
	Soil	Wastewater (e.g. paint)	N	L	-		Community Infrastructure	Provision of conducive working facilities	H	H	+
	Vegetation	Wastewater (e.g. paint)	N	L	-		Public Health	None			
							Land Use	None			
							Population/ Demographics	None			
Up grading of equipment eq. (ICT lab, etc)	Air	None					Community Structure	None			
	Surface/Ground water	None					Livelihood	None			
	Soil	None					Community Infrastructure	Better equipped offices	M	M	+
	Vegetation	None					Public Health	None			
							Land Use	None			
							Population/ Demographics	None			
Green & Clean work	Air	Cleaner Air	N	L	-		Community Structure	None	NA	NA	NA
	Surface/Ground water	None	NA	NA	NA		Livelihood	Improved condition			
	Soil	None	NA	NA	NA		Community Infrastructure	Enhanced security in working premises.	H	H	+
	Vegetation	None	N	L	-		Public Health	None	L	H	-
							Land Use	None	L	L	-
							Population/	None	NA	NA	NA

							Demographics				
Landscaping (tree planting, grasses, etc)	Air	None	N	N			Community Structure	None			
	Surface/Ground water	None	N	N			Livelihood	None			
	Soil	None	N	N			Community Infrastructure	None			
	Vegetation	None	N	N			Public Health	None			
							Land Use	None			
							Population/ Demographics	None			
Quality of Public Finance Management and effective public procurement process	Air	None					Community Structure	None			
	Surface/Ground water	None					Livelihood	Capacity building on public finance reforms	M	M	+
	Soil	None					Community Infrastructure	Improved public finance reforms	M	M	+
	Vegetation	None					Public Health	Increased awareness on health issues	M	M	+
							Land Use	None			
							Population/ Demographics	None			
Improved Governance	Air	None					Community Structure	None			
	Surface/Ground water	None					Livelihood	None			
	Soil	None					Community Infrastructure	Improved financial sector	M	M	+
	Vegetation	None					Public Health	None			
							Land Use	None			
							Population/ Demographics	None			

Note: NA implies "not applicable"

CHAPTER SIX: Environmental and Social Management Plan (ESMP)

An Environmental and Social Management Plan (ESMP) defines project-specific environmental and social mitigation measures, monitoring programmes, and responsibilities based on the analysis of potential environmental and social impacts of the project. This ESMP is intended to ensure efficient environmental management of these activities. It includes the following sections:

- the potential environmental and social impacts (see Chapter five),
- the proposed mitigation measures,
- implementation arrangement,
- responsibilities for implementing mitigation and monitoring measures;
- capacity building needs; and
- implementation cost estimate

6.1 Mitigation Measures

The objective of the ESMF is to provide a framework for preventing and mitigating the potential negative impacts associated with the SLOGOR project. This includes measures that can reduce these negative impacts associated with sub-project activities e.g. renovation and rehabilitation works etc.

The potential impacts of the projects and their mitigation measures are indicated in the Table 6.0 below.
The table indicates the areas to which the potential impact and its associated measure apply. In addition, mitigation measures are identified as either social or physical measures. Social mitigation includes the measures used to mitigate effects such as noise, and other effects to the human environment. Physical mitigation includes measures that address impacts to the physical environment, such as biological communities, vegetation, air quality, and others

Table 6.0: Potential environmental and social impacts and recommended mitigation measures

Potential Adverse Impacts		Recommended Mitigation Measures
ENVIRONMENTAL		
Renovation/Rehabilitation phase		
Air quality	▪ Emission of dust and particulate matter leading to the reduction of air quality; ▪ Air pollution from burning of renovation waste e.g. wood, scrap materials, paper.	▪ Introduction of dust reduction measures at rehabilitation sites(sprinkle water to reduce dust) ▪ Avoid rehabilitation activities during bad weather ▪ Adopt proper waste management strategy ▪ Prohibit waste combustion on site ▪ Service equipment regularly ▪ Workers should use PPEs (nose masks)
Water quality	▪ Potential pollution of nearby surface water or ground water though runoff of pollutants e.g. lubricating oil, paint etc from workshop areas etc ▪ Wastewater spills or run-off but with little or no adverse effect on the immediate environment.	▪ Appropriate containment measures for all operational areas and proper disposal of used lubrication oil (dedicated containers). ▪ Site storage facilities far from water bodies. ▪ Regular collection of work sites wastes for proper disposal ▪ Liquid waste discharged at designated outfalls after effluent treatment to protect water resources ▪ Regular emptying of on-site latrines and toilets ▪ Prohibit use of defunct equipment
Soil quality	▪ Point source contamination around workshop areas ▪ Contamination from waste materials e.g. cement, paints, lubricants, fuels and detergents	▪ Appropriate containment measures for all operational areas and proper disposal of used lubricants (dedicated containers, bund walls). ▪ Restrict site activities to relevant areas only

Noise Pollution	▪ Loud noise resulting from the use of equipment during renovation and rehabilitation works.	▪ Installation of sound insulation such as silencers, mufflers, etc ▪ Schedule work periods to avoid working hours ▪ Use appropriate well serviced equipment to reduce noise output
Flora and Fauna	▪ Contamination of biota; ▪ Vegetation clearing resulting in loss of valuable habitat, species diversity and population levels	▪ No siting and excavations in sensitive habitat. ▪ Restrict site activities to relevant areas only
Solid Waste	▪ Solid waste generated from demolition and rehabilitation activities containing potentially hazardous materials (e.g asbestos)	▪ Quick sorting, collection and disposal of waste removed from the sites in accordance with applicable regulations. ▪ Employ services of registered waste management company ▪ Convert some debris to fuel wood, and dispose of the rest properly ▪ Prohibit illegal dumping of solid wastes
Operation phase		
Air quality	▪ Air pollution from burning of waste generated from project operations e.g. scrap materials, paper etc	▪ Prohibit waste combustion. ▪ Provide air/ventilation vents for better air
Waste water	▪ Waste water run-off from improper waste management	▪ Adopt proper waste management strategy
Water and soil quality	▪ Pollution from on-site sewage systems;	▪ Regular emptying of on-site latrines and toilets
Solid Waste	▪ Illegal dumping of solid waste in drains	▪ Adopt proper waste management strategy
SOCIAL AND HEALTH IMPACTS		
Renovation/Rehabilitation phase		
Noise	▪ Disturbance to the local communities from noise and vibration of civil works	▪ Schedule work periods to avoid working hours ▪ Use appropriate well serviced equipment to reduce noise output
Health and Safety	▪ Exposure to health and safety risks for the site workers and local residents	▪ Ensure that workers wear necessary PPEs ▪ Provide first aid on site ▪ Provide firefighting equipment and prepare and comply with basic EHS requirements
Public Health	▪ Contamination risk by HIV from the labour force; ▪ Transmission of diseases; ▪ Allergy resulting from chemical inhalation e.g. from paints, lubricants, fuels etc.	▪ Provide air/ventilation vents for better air ▪ Provide portable water for flashing of toilets after use ▪ Provide soap for washing of hands ▪ Collect, transport and dispose debris properly ▪ Ensure that latrines have close fitting lids
Disruptions of utility services	▪ Temporary disruptions of utility services such as electricity and water	▪ Schedule work periods to avoid working hours
Traffic	▪ Increased human traffic	▪ Schedule work periods to avoid working hours
Operation phase		
Health and Safety	▪ Risk of fire after completion	▪ Ensure that necessary PPE's, and fire extinguishers are in place.
Public Health	▪ Improper use of sanitary facilities which could attract pests and diseases	▪ Ensure that latrines have close fitting lids

6.2 Implementation Arrangement

The key stakeholders required to implement the ESMP are identified including their relationships and reporting responsibilities.

An Environmental and Social safeguards consultant, seconded from either SMOEnv or SEPA's to the SPCU will be responsible for the implementation and monitoring of the ESMP.

The SPCU will achieve the following objectives:

- propose management rules and specific measures that are compatible with sustainable development while implementing the project,
- promote awareness of environmental protection, and
- Propose concrete means of applying the ESMP.

The Environmental and Social safeguards consultant will develop a monitoring plan to ensure ESMP implementation occurs in a structured manner. On behalf of the SPCU, the Environmental and Social safeguards consultant will implement the monitoring plan and submit periodic environmental monitoring reports to SMOEnv and SEPA's. Each report will indicate that members of the SPCU should be contacted for clarification of issues.

6.3 Roles and Responsibilities for Environmental & Social Safeguards Implementation

The successful implementation of the ESMF depends on the commitment of the inter-related institutions, and the capacity within the institutions to apply or use the ESMF effectively, as well as the appropriate and functional institutional arrangements, among others.
Therefore, details of institutional arrangements, the roles and responsibilities of the institutions that would be involved in the implementation of the ESMF are highlighted below. For the purpose of this ESMF, the institutions identified include;

6.3.1 Federal Level Institutions

The institutions at the federal level are responsible for the establishment of national policy goals and objectives and the appropriate provision of technical and financial assistance to State and local governments.

Federal Ministry of Environment (FMEnv)

For this ESMF specifically, the Federal Ministry of Environment shall play the role of lead environmental regulator, overseeing compliance requirements, granting consent and also monitoring or providing supervisory oversight for SLOGOR projects. It shall also receive comments from stakeholders, public hearing of project proposals, and convening technical decision-making panel as well as provide approval and needed clearance for EA/EMP or other environmental clearance.
Federal Ministry of Environment (FMEnv) is mandated by the Federal Republic of Nigeria to ensure environmental protection and natural resources conservation for a sustainable development in the country. They promote cooperation in environmental science and conservation technology with similar bodies in other countries and with international bodies connected with the protection of the environment and the conservation of natural resources. The Ministry also cooperates with Federal and State Ministries, Local Government, statutory bodies and research agencies on matters and facilities relating to the protection of the environment and the conservation of natural resources.

National Project Coordination Unit (NPCU)

The role of the NPCU in this project will be that of monitoring the overall project activities. The coordination and facilitation of sub project activities in the participating states which includes the renovation and rehabilitation of existing institutions.

6.3.2 State Level Institutions

The State level institutions include the SPCUs and other relevant Ministries, Departments and Agencies (MDAs). Some relevant agencies include:

State Environmental Protections Agencies/Authorities (SEPAs)

Most states have set up Environmental Protection agencies as the regulatory body to protect and manage the environmental issues in their domain. The functions of the SEPAs include:

- Enforcement of all environmental legislations in the states
- Minimization of impacts of physical development on the ecosystem
- Preservation, conservation and restoration to pre-impact status of all ecological process essential
- For the preservation of biological diversity.
- Protection of air, water, land, forest and wildlife within the state.
- Pollution control and environmental health in the state.

State Project Coordinating Unit (SPCU)

The SPCU will be responsible for the day-to-day oversight of operations, compliance with procedures and relations with the NPCU, the SSC and the World Bank. The SPCU at this stage will recruit an Environmental and Social safeguards consultant to be responsible for safeguard issues as required.

It will also procure all service providers and process payments for SLOGOR activates financed by the World Bank. The SPCU is also expected to work closely with the two designated committees operating at the State level.

The designated Environmental and Social safeguards consultant recruited by the State Project Coordinating Unit will be responsible for the implementation of the ESMF and the recommendations contained in the safeguard instrument.

6.3.3 Local Government Level Institutions

The LG governs the affairs in the various communities. It is expected that it serves as an inter-phase between the stakeholders in the local offices and SLOGOR. The LGAs can assist in the implementation of the proper community mechanism. Their staff can work together with the other MDAs and CBOs. The Local Government Council has to be fully briefed and enlightened in the process and steps to be taken in the ESMF/ESMP and the overall project execution. The Council should in turn engage and should be encouraged to carry out a comprehensive and practical awareness campaign for the proposed project, amongst the various relevant grass roots interest groups.

6.3.4 The World Bank

The World Bank has the overall responsibility to ensure that its safeguards polices are complied with. In addition, the WB is responsible for the final review and clearance of the ESMPs or ESIAs; as well as review and approval of TORs.

Table 6.1: Institutional Framework for Environmental and Social Management Plan

Institution	Tasks/Activities
Federal Level Institutions	
National Project Coordination Unit (NPCU)	The coordination and facilitation of sub project activities in the participating states which includes the renovation and rehabilitation of existing institutions.
Federal Ministry of Environment (FMEnv)	Role of lead environmental regulator, overseeing compliance requirements, granting consent and also monitoring or providing supervisory oversight for SLOGOR project activities.
State Level Institutions	
State Project Coordinating Unit (SPCU)	Day-to-day oversight of operations, compliance with procedures and relations with the NPCU. The designated Environmental and social safeguards consultant in the State Project Coordinating Unit will be responsible for the implementation of the ESMF and the recommendations contained in the safeguard instrument if required.
State Ministry of Environment, EPA's/ Waste Management Authorities	Enforcement of all environmental legislations in the states
Project Committees	
State Steering Committees (SCC)	Review the implementation of the State subproject activities
State Technical Committees (STC)	Review the technical progress of components, provide quality assurance to the work of consultants and AEA's and discuss and resolve cross agency technical issues
World Bank	
World Bank	Review, approve and clearance of ESMPs; Monitoring state committees

6.4 Monitoring Plan

The monitoring plan establishes appropriate criteria to validate the predicted impacts and ensure that any unforeseen impacts are detected and the mitigation adjusted where needed at an early stage. The plan will ensure that mitigating measures are implemented during renovation, upgrading and maintenance (Annex 5). Specific objectives of the monitoring plan are to:

- check the effectiveness of recommended mitigation measures;
- demonstrate that sub-project activities are carried out in accordance with the prescribed mitigation measures and existing regulatory procedures; and
- provide early warning signals whenever an impact indicator approaches a critical level.

6.4.1 Monitoring Procedure

The ESS will prepare a long-term monitoring plan that will encompass clear and definitive parameters to be monitored for each sub-project. The plan will take into consideration the scope of development, the environmental and social sensitivity and the financial and technical means available for monitoring. It will also identify and describe the indicators to be used, the frequency of monitoring and the standard (baseline) against which the indicators will be measured for compliance with the ESMP.

A number of indicators would be used to determine the status of the affected environment:

- Has the pre-project human and natural environmental state been maintained or improved?
- Has the effectiveness of the ESMF technical assistance, review, approval and monitoring process been adequate to pre-empt and correct negative impacts inherent in sub- projects?

Environmental Indicators: vegetation loss; land degradation; regulatory compliance.

Social indicators: population incomes; traffic, changes public procurement and budget performance etc

6.5 Estimated Budget for Implementing the ESMF

The quantities, specifications and estimated costs of design measures to avoid or mitigate negative impacts of each project site will be assessed by the civil design contractor and the environmental specialist in all the state PCUs and incorporated into their bidding documents. The contractor will execute all required works and will be reimbursed through pay items in the bill of quantities, which will be financed by the project.

Table 6.2 below shows a budget breakdown and responsibility of the cost for implementing the Environmental and Social Management Framework (ESMF). The total cost for implementing the ESMF is estimated at **Two Hundred and Seventy two Thousand and Eight Hundred US Dollars only ($272,800)**.

Table 6.2: Summary of budget breakdown and responsibility of the cost for implementing the ESMF Instruments

Item	Responsibility	Cost Breakdown	Cost Estimate in Nigerian Naira (N)	Cost Estimate in Us Dollars (US$)
Mitigation	State's SLOGOR and State's EPA		25,600,000	160,000
Management	State's SLOGOR/SEPAs	5% of Mitigation Cost	1,280,000	8,000
Capacity Building	State's SLOGOR Staff/ Consultants/SEPAs	25% of Mitigation Cost	6,400,000	40,000
Monitoring	State's SLOGOR/State's EPA	25% of Mitigation Cost	6,400,000	40,000
Sub- Total			39,680,000	248,000
Contingency		10% of Sub- Total	3,968,800	24,800
Total			**43,668,000**	**272,800**

6.6 Capacity Building for ESMP Implementation

In order to ensure proper implementation of environmental and social screening and mitigation measures, as well as effective community development, SLOGOR will undertake an intensive programme of environmental training and institutional capacity building spread out over the life cycle of the project.

6.6.1 Environmental Training and Sensitization

Training and sensitization will be required at the levels of the State Steering Committee and SPCU. The specialist at the State and the SLOGOR environment/social specialist will be responsible for providing the required technical training on environmental and social issues to these groups.
For each group, training will be provided to bring them to a different level of expertise in different areas, and would include:

- In-depth training to a level that allows trainees to go on to train others, including technical procedures where relevant;
- Sensitization, in which the trainees become familiar with the issues to a sufficient extent that it allows them to demand precise requirement for further technical assistance; and
- Awareness-raising in which the participants acknowledge the significance or relevance of the issues, but are not required to have technical or in-depth knowledge of the issues

The objectives of the training/capacity building efforts under the SLOGOR project will be to:

- Support participating MDAs to mainstream environmental and social issues in their sub-projects.
- Ensure that LGAs have the capacity to assist communities in preparing sub-project proposals, to appraise, approve and supervise the implementation of sub-projects; and
- Strengthen the capacity of local NGOs and other services providers to provide technical support to communities in environmental and social aspects of the sub-projects.

The target audience for training, sensitization and capacity building, will inter-alia include the following:
Project Coordinators, SSC Team, State Project Coordinating Teams, LGAs Staff involved in environmental and social concerns, Environment consultant (s) at the SPCU, NGO's/CBOs in the planning and finance sectors, State Environmental Protection Agencies/Authorities, Local Service Providers.
The training will follow the programme in table 6.3 below:

Table 6.3: Institutional Capacity Strengthening Program

Target Audience	**Description**	**Application**	**Duration**
Project coordinators/teams State PCU	General environmental awareness seminar that will include ecological and social science principles, legal responsibilities, consequences of non-sustainable development, costs of poor environmental decisions, and introduction to the EA process.	Personnel require appreciation of WB's, Federal/State environmental policies, as well as, an appreciation for the need to support environmentally sustainable development.	3 days
Environmental specialist/consultant, officials of SEPAs and LGA environmental and social specialists	An in-depth comprehensive course on environmental management including legal requirements, Impact determination (methods) and mitigation analysis, public involvement methods, ESMP preparation, monitoring techniques, TORs, and other. Course will include field visits and classroom exercises.	The target audience will be responsible for EA review at the State level and for preparing TORs for ESMP consultants and final approval of ESMPs. Target audience will also be responsible for conducting environmental audits on selected sub-projects and for periodic monitoring of sub-project implementation to ensure compliance.	5 days
CBOs/NGOs, local government staff	General environmental awareness seminar that will include ecological and social science principles, legal responsibilities, consequences of non-sustainable development, costs of poor environmental decisions, and introduction to the ESMP process.	Local Government level staff requires an appreciation for the WB's and Nigerian environmental requirements, as well as, an appreciation for the need to support sustainable development.	1day

CHAPTER SEVEN: STAKEHOLDER CONSULTATION

The SPCUs has the responsibility to effectively engage stakeholders in achieving the project objectives for the benefit of all. The successful implementation of SLOGOR depends on the meaningful participation of all stakeholders.

7.1 Objectives

This plan provides a framework for achieving effective stakeholder involvement and promoting greater awareness and understanding of issues so that the project is carried out effectively within budget and on-time to the satisfaction of all concerned.

To ensure effective implementation of this plan, the SPCU shall be committed to the following principles:

- promoting openness and communication;
- ensuring effective stakeholder involvement in the development of the project;
- increasing public knowledge and understanding of the project implementation process;
- using all strategies and techniques which provide appropriate, timely and adequate opportunities for all stakeholders to participate; and
- Evaluating the effectiveness of the engagement plan in accordance with the expected outcomes.

7.2 Identification of Stakeholders

The stakeholders of SLOGOR project are identifiable through the ownership structure, partnership structure and the target beneficiary plan. Based on these, the stakeholders include MDAs at the Federal State and LGA levels, the youth, civil society groups and NGOs within the defined age bracket. These categories are listed as follow:

Federal Level:

- National Planning Commission

State Level- MDAs:

- Ministry of Economic Planning and Budget;
- Ministry of Finance;
- Board of Internal Revenue;
- Accountant General;
- Due Process/ Public Procurement;
- Ministry of Environment;
- Environmental Protection Boards;
- Waste Management Agencies;
- Private Organizations/Entrepreneurs.

7.3 Consultation Strategies

The consultation process shall ensure that all those identified as stakeholders are conferred with. Subject to SPCU coordinator's approval, the Environmental/Social consultant will share information about the project with the public to enable meaningful contributions and thus enhance the success of the project.

Public consultation will take place through workshops, seminars, meetings, radio programme, request for written proposals/comments, questionnaire administration, public reading and explanation of project ideas and requirements.

The summarized outcome of the consultation meetings is presented in table 7.1 below. Annex 6 shows the list of stakeholders met during the public consultation.

Table 7.1: Summary outcome of stakeholder consultation meetings

Overview	The meetings in each case started with self-introduction by participants facilitated by the State PC and was usually followed by the PC's opening remarks and introduction of the Consultant. The Consultant took the responsibility of explaining to the participants the objective of SLOGOR, project components and the rationale for the ESMF. In each case, opportunity was given to the SPCU and the MDAs to give a brief of the programs being implemented at the respective States, their experiences and rationale for being part of the SLOGOR project. The stakeholders present were also given opportunity of expression and contribution. Through preliminary description of sub-projects/programs, the Consultant facilitated the discussion of project environmental and social impacts. Concerns and comments that were addressed in each forum across the States were related and encapsulated in the presentations of six States Consultation proceedings below.		
Date	***State***	***Concerns***	***Comments***
03/04/13	**Abuja**	• State contact persons and adequate knowledge of the project in the participating states were reviewed. Concerns were raised on the contacts of the exact stakeholders at the state level.	• The first- level consultation was made at the National Project Coordinating Unit (NPCU), Abuja. The focus of the consultation was to identify stakeholders. • National project officers reviewed the draft ESMF questionnaire which was administered to states before the field visits.
02/5/13	**Anambra**	• Project team expressed lack of in-depth knowledge with project objectives and what exactly was to be achieved. • The SPCU raised concern on the need for renovations and rehabilitation of SLOGOR office section within the civil service secretariat as well as upgrade of office equipment. These would involve minor civil works. • There was a concern on the need for government to put more attention in carrying out EIA studies in all civil works. • Stakeholders are concerned with how SLOGOR would be implemented.	• Project officers noted that Project activities/execution would have no discernable environmental and social impact therefore, there are no likely challenges concerning environmental management of project operations; • Project Appraisal Document is still been reviewed.
29/4/13	**Cross River**	• The need to scale up the public sector finance reforms to the 18 LGA's was emphasised as the team would want a state wide intervention. • There is an existing office for project staff. The special adviser international support, noted up scaling support to local governance will involve rehabilitation works and training of staff. • Concerns over the rehabilitation of The Management Development Institute (MDI), the office of the auditor general were raised including training of both state and local government staff. • A work plan of activities is being undertaken.	• Cross river state waste management agency is responsible for the disposal of waste in Calabar and it is done in conjunction with the following 5 urban authorities on waste management; which are: Ikom municipal authority, Ugep municipal authority , Calabar municipal authority, Obudu municipal authority ,Ogoja municipal authority

6/5/13	**Osun**	• The issue of the planning commission or ministry of finance as the implementing ministry/agency was addressed. The Commissioner for Finance iterated that since the project is primarily a finance reform project, the finance ministry is to anchor the project. • There were concerns about the great lapse during budget preparation which makes the budget higher than the state's IGR. • The gap in ICT capacity and internal audit within civil servants was raised. • Lack of depth in the public procurement process was highlighted. • Need for building capacities among project staff was highlighted by the PS Finance. • The Environmental Assessment Unit lacks the capacity to carry out EA studies.	• Project team pointed out that reform comes under component A. These key reforms include; - Training of project team on ICT and ICT equipment should be acquired • Commissioner of Finance noted that Reforms be majorly on ICT. • Project team noted the need to integrate ICT capacity building within the LGs. • There is provision for project officers within the secretariat and also within the PMFU which involves up-grading of equipment. • Osun Waste Management Agency has the capacity to carry out EA studies as well as solid waste management. • Inadequate funding and cultural practices are challenges concerning environmental management of project operations.
29/4/13	**Kano**	• There is an on-going reform within the state in conjunction with the Federal Government in line with the new budget code as well as E-payment in public and private transactions. • Existing office to accommodate project staff need rehabilitation as well as in the LGAs which will be capital intensive. • Items constituting the IGR include land reforms and tax collection • Solid waste management is a major concern as wastes are disposed off in the open. • Inadequate vehicles to reach out to rural areas, inadequate public advocacy equipment, low level awareness on environmental issues by the public and low level of understanding of risk and vulnerability are the challenges concerning environmental management of projects operations.	• The Project team will review The Project Appraisal Document (PAD) to get a full grasp of SLOGOR.
2/5/13	**Jigawa**	• Existing office to accommodate project staff need rehabilitation. These will also be extended to the 5 emirate councils: Hadeja, Dutse, Rimgim, Gumel and Kazaure.	• The project does not envisage any negative environmental impact as project output is largely on governance reforms and capacity of public expenditure and financial management issues; • Solid wastes are disposed largely through the use of barrow pits
30/4/13	**Yobe**	• The need for a guide to implement procurement, accounting and M&E processes as well as concerns on how to assess the effect and impacts on	• Enlightenment and sensitization as well as building capacities within the coordinating unit were highlighted. • Government is responsible for solid

		reform processes were discussed. • Concerns on the ability of LGAs of procuring and tendering were noted. Thus, linking local Government accounts to state government accounts to improve reforms in terms of accounting and auditing were buttressed. • The provision of IT centres in at least each local government to form the linkage in financial reforms to the state with minor rehabilitation works was not left out. • Lack of enlightenment and poor mobilization as well as the general and poor approach by the public against environmental issues are the challenges concerning environmental management of projects operations.	waste management. Solid waste management is a major concern as wastes are disposed off in the open and or incinerated.

Annex 1: Summary Of World Bank Environmental and Social Safeguard Policies.

- ***Environmental Assessment (OP 4.01).*** Outlines Bank policy and procedure for the environmental assessment of Bank lending operations. The Bank undertakes environmental screening of each proposed project to determine the appropriate extent and type of EA process. This environmental process will apply to all sub-projects to be funded by SLOGOR.
- ***Natural Habitats (OP 4.04).*** The conservation of natural habitats, like other measures that protect and enhance the environment, is essential for long-term sustainable development. The Bank does not support projects involving the significant conversion of natural habitats unless there are no feasible alternatives for the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs. If the environmental assessment indicates that a project would significantly convert or degrade natural habitats, the project includes mitigation measures acceptable to the Bank. Such mitigation measures include, as appropriate, minimizing habitat loss (e.g. strategic habitat retention and post-development restoration) and establishing and maintaining an ecologically similar protected area. The Bank accepts other forms of mitigation measures only when they are technically justified. Should the sub-project-specific ESMPs indicate that natural habitats might be affected negatively by the proposed sub-project activities with suitable mitigation measures, such sub-projects will not be funded under SLOGOR.
- ***Pest Management (OP 4.09).*** The policy supports safe, affective, and environmentally sound pest management. It promotes the use of biological and environmental control methods. An assessment is made of the capacity of the country's regulatory framework and institutions to promote and support safe, effective, and environmentally sound pest management. This policy does not apply to the SLOGOR project.
- ***Involuntary Resettlement (OP 4.12).*** This policy covers direct economic and social impacts that both result from Bank-assisted investment projects, and are caused by (a) the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets or access to assets, or (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or (b) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. This policy does not apply to the SLOGOR project.
- ***Indigenous Peoples (OP 4.10).*** This directive provides guidance to ensure that indigenous peoples benefit from development projects, and to avoid or mitigate adverse effects of Bank-financed development projects on indigenous peoples. Measures to address issues pertaining to indigenous peoples must be based on the informed participation of the indigenous people themselves. Sub-projects that would have negative impacts on indigenous people will not be funded under SLOGOR.
- ***Forests (OP 4.36).*** This policy applies to the following types of Bank-financed investment projects: (a) projects that have or may have impacts on the health and quality of forests; (b) projects that affect the rights and welfare of people and their level of dependence upon or interaction with forests; and (c) projects that aim to bring about changes in the management, protection, or utilization of natural forests or plantations, whether they are publicly, privately, or communally owned. The Bank does not finance projects that, in its opinion, would involve significant conversion or degradation of critical forest areas or related critical habitats. If a project involves the significant conversion or degradation of natural forests or related natural habitats that the Bank determines are not critical, and the Bank determines that there are no feasible alternatives to the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs, the Bank may finance the project provided that it incorporates appropriate mitigation measures. Sub-projects that are likely to have negative impacts on forests will not be funded under SLOGOR.

- ***Physical Cultural Resources (OP 4.11).*** The term "cultural property" includes sites having archaeological (prehistoric), paleontological, historical, religious, and unique natural values. The Bank's general policy regarding cultural property is to assist in their preservation, and to seek to avoid their elimination. Specifically, the Bank (i) normally declines to finance projects that will significantly damage non-replicable cultural property, and will assist only those projects that are sited or designed so as to prevent such damage; and (ii) will assist in the protection and enhancement of cultural properties encountered in Bank-financed projects, rather than leaving that protection to chance. The management of cultural property of a country is the responsibility of the government. The government's attention should be drawn specifically to what is known about the cultural property aspects of the proposed project site and appropriate agencies, NGOs, or university departments should be consulted; if there are any questions concerning cultural property in the area, a brief reconnaissance survey should be undertaken in the field by a specialist. SLOGOR will not fund sub-projects that will have negative impacts on cultural property.
- ***Safety of Dams (OP 4.37).*** For the life of any dam, the owner is responsible for ensuring that appropriate measures are taken and sufficient resources provided for the safety to the dam, irrespective of its funding sources or construction status. The Bank distinguishes between small and large dams. Small dams are normally less than 15 m in height; this category includes, for example, farm ponds, local silt retention dams, and low embankment tanks. For small dams, generic dam safety measures designed by qualified engineers are usually adequate. This policy does not apply to SLOGOR since the policy is not triggered under the project.
- ***Projects on International Waterways (OP 7.50).*** The Bank recognizes that the cooperation and good will of riparians is essential for the efficient utilization and protection of international waterways and attaches great importance to riparian's making appropriate agreements or arrangement for the entire waterway or any part thereof. Projects that trigger this policy include hydroelectric, irrigation, flood control, navigation, drainage, water and sewerage, industrial, and similar projects that involve the use or potential pollution of international waterways. This policy will not apply to SLOGOR
- ***Disputed Areas (OP/BP/GP 7.60)***. Project in disputed areas may occur the Bank and its member countries as well as between the borrower and one or more neighboring countries. Any dispute over an area in which a proposed project is located requires formal procedures at the earliest possible stage. The Bank attempts to acquire assurance that it may proceed with a project in a disputed area if the governments concerned agree that, pending the settlement of the dispute, the project proposed can go forward without prejudice to the claims of the country having a dispute. This policy is not expected to be triggered by sub-projects. This policy is unlikely to be triggered by sub-projects to be funded by SLOGOR.

Annex 2a: Screening Report for Standard Format and Screening Checklist

1. GENERAL DESCRIPTION
    1.1. Overview of the State/Local Government
    1.2. List of selected existing financial institution.

2. PROJECT-SPECIFIC SCREENING (FOR EACH STATE EXISTING FINANCIAL INSTITUTION):
    2.1. Existing alignment
    2.2. Proposed Works
    2.3. Estimated Cost
    2.4. Summary of Environment and Social Issues
        2.4.1. Land Resources
        2.4.2. Hydrology and Water Resources
        2.4.3. Air and Noise
        2.4.4. Biological Resources
        2.4.5. Socio-Economic and Cultural
            2.4.5.1. Population
            2.4.5.2. Employment and Other Benefits
            2.4.5.3. Other site-specific issues
    2.5. Environment Screening Category
    2.6. Applicable Safeguard Policies

3. STATE/LOCAL GOVERNMENT PACKAGE ESMP ACTION PLAN

4. ATTACHMENTS
    4.1. Construction Maps/ Drawings
    4.2. Photos
    4.3. Location and Administrative Maps
    4.4 Environment and Social Checklist

Annex 2b: Screening Report Environment and Social Checklist

Local Government:	**Facility:**	**Date:**

Issue	**Degree***	**Comment**
Land Resources		
Worksite/Campsite Areas		
Excavation/Borrow Areas		
Disposal Areas		
Other		
Water Resources & Hydrology		
Sources of Water for Rehabilitation works		
Drainage Issues		
Other		
Biological Resources		
Special Trees/Vegetation on site		
Protected Areas directly affected		
Other		
Air Quality & Noise		
Special issues (e.g. quiet zone for hospital)		
Socio-Economic & Cultural		
Involuntary Resettlement**		
Graveyards and Sacred Areas affected		
Cultural Resources		
Population affected/provided access		
Other		

*Degree: N = Negligible or Not Applicable
L = Low
M = Moderate
H = High

**If yes, indicate # of persons affected and nature of the effect

Annex 3: Draft ESMP Terms of Reference

Introduction and context

This part will be completed in time and will include necessary information related to the context and methodology to carry out the study.

Objectives of study

This section will indicate (i) the objectives and the project activities; (ii) the activities that may cause environmental and social negative impacts and needing adequate mitigation measures.

Tasks

The consultant should realize the following:

1 Assess the potential environmental and social impacts related to project activities and recommend adequate mitigation measures, including costs estimation..
2 Review institutional assessment and framework for environmental management.
3 Identify responsibilities and actors for the implementation of proposed mitigation measures
4 Assess the capacity available to implement the proposed mitigation measures, and suggest recommendation in terms of training and capacity building, and estimate their costs.
5 Develop a Environmental and Social Management Plan (ESMP) for the project. The ESMP should underline (i) the potential environmental and social impacts resulting from project activities (ii) the proposed mitigation measures; (iii) the institutional responsibilities for implementation; (iv) the monitoring indicators; (v) the institutional responsibilities for monitoring and implementation of mitigation measures; (vi) the costs of activities; and (vii) the calendar of implementation.
6 Public consultations. The ESMP results and the proposed mitigation measures will be discussed with relevant stakeholders, NGOs, local administration and other organizations mainly involved by the project activities. Recommendations from this public consultation will be include in the final ESMP report.

Plan of the ESMP report

1 Cover page
2 Table of contents
3 List of acronyms
4 Executive summary
5 Introduction
6 Description of sub-project sites
7 Description of environmental and social impacts and mitigation measures for project activities
8 Institutional Assessment and framework for Environmental Management.
9 Environmental and Social Management Plan (ESMP) for the project
    - including the proposed mitigation measures;
    - Institutional Responsibilities for Implementation;
    - Monitoring indicators;
    - Institutional responsibilities for monitoring and implementation of mitigation;
    - Summarized table for ESMP including costs
    - ESMP Training requirements
10 Public Consultation
11 Conclusion and Recommendations
12 Annexes: List of persons / institutions meet

Duration of study

The duration of study will be determined according to the type of activity

Production of final report

The consultant will produce the final report one (1) week after receiving comments from the World Bank, SEPAs/FMEnv (Impact Monitoring Unit) and the PCU. The report will include all the comments from all.

Supervision of study

The consultancy will be supervised by the Environmental and Social Specialist at the State PCU.

Annex 4: Contract Provisions: Environmental and Social Impacts

1. **General Provisions and Precautions**

   The contractor shall all necessary measure and precautions and otherwise ensures that the execution of the works and all associated operations on the work sites or off site are carried out in conformity with statutory and regulatory environmental requirement of Nigeria. The contractor shall take all measures and precautions to avoid any nuisance or disturbance arising from the execution of the work. This shall, wherever possible, be achieved by suppression of the nuisance at source rather than abatement of the nuisance once generated. In the event of any soil or debris or silt from the work sites being deposited on any adjacent land, the contractor shall immediately remove all such spoil debris or silt and restore the affected area to its original state to the satisfaction of the responsible authorities.

2. **Water Quality**

   The following conditions shall apply to avoid adverse impacts to water quality:

   1 The contractor shall prevent any interference with supply to, or abstraction from, water resources and the pollution of water resources (including underground percolating water) as a result of the execution of the works.
   2 The contractor shall not discharge or deposit any matter arising from the execution of the work into any waters except with the permission of the contractor and regulatory authorities concerned.
   3 The contractor shall at all times ensure that all existing stream courses and drains within and adjacent to the site are kept safe and free from any debris and any material arising from the works.
   4 The contractor shall protect all water courses, waterways, ditches, canals, drains, lakes and the like from pollution, silting, flooding or erosion as a result of the execution of the works.

3. **Air Quality**

   The following conditions shall apply to avoid adverse impacts to air quality:

   1 Open burning will be prohibited.
   2 Blasting (If any) will be carried out using small charges, and dust – generating items will be conveyed under cover.
   3 In periods of high wind, dust- generating operations shall not be permitted within 200 meters of residential areas having regard to the prevailing direction of the wind.
   4 Asphalts and hot- mix plants sites shall not be established prior to the approval of the contractor and shall be located at least 500 meters away from the nearest sensitive receptor(e.g. ,schools and hospitals).Operators will be required to install emission controls.
   5 Water sprays shall be used during the delivery and handling of materials when dust is likely to be created and to dampen stored materials during dry and windy weather.
   6 Stockpiles of materials shall be sited in sheltered areas or within hoarding, away from sensitive areas. Stockpiles of friable material shall be covered with tarpaulins. With application of sprayed water during dry and windy weather. Stockpiles of material or debris shall be dampened prior to their movement whenever warranted.
   7 Vehicle with an open load – carrying area used for transporting potentially dust-producing material shall have proper fitting side and tailboards. Materials having the potential to produce dust shall not be loaded to a level higher than the side and tail

boards, and shall be covered with a clean tarpaulin in good condition. The tarpaulin shall be properly secured and extend over the edges of the side and tailboards.

8 In periods of adverse weather adverse impacts to adjacent residents or site employees during construction will be mitigated by either discontinuing until favourable conditions are restored, or, if warranted, sites may be watered to prevent dust generation, particularly at crushing plants.

9 Machinery and equipment will be fitted with pollution control devices, which will be checked at regular intervals to ensure that they are in working order. Best available pollution control technologies will be used

4. Protection of soils

Borrow pits. The following conditions shall apply to borrow pits:

1 Borrow areas will be located outside the ROWs.
2 Pit restoration will follow the completion of works in full compliance all applicable standards and specification.
3 The excavation and restoration o f the borrow areas and their surroundings, in an environmentally sound manner to the satisfaction of the contractor is required before final acceptance and payment under the terms of contracts.
4 Borrow pit areas will be graded to ensure drainage and visual uniformity, or to create permanent tanks\dams.
5 Topsoil from borrow pit areas will be saved and reused in re-vegetating the pits to the satisfaction of the contractor.
6 Additional borrow pits will not be opened without the restoration of those areas no longer in use.

Quarries. To ensure adequate mitigation of potential adverse impacts, only licensed quarrying operations are to be used for material sources. If licensed quarries are not available the contractors may be made responsible for setting up their dedicated crusher plants at approved quarry sites.

Erosion. To avoid potential adverse impacts due to erosion, the contractor shall:

1 Line spillage ways with riprap to prevent undercutting.
2 Provide mitigation plantings and fencing where necessary to stabilize the soil and reduce erosion.
3 Upgrade and adequately size, line and contour storm drainage to minimize erosion potential.
4 To avoid erosion and gullying of road formations, the contractor should reduce his earthworks during the peak of rainy seasons, use gabions and miter drains and avoid angle termination at the intersections of cuts and fills.
5 As noted in elsewhere in these specifications, ditches shall be designed for the toe of slopes in cut sections with gutters or drainage chutes being employed to carry water down slopes to prevent erosion. Interceptor ditches shall be designed and constructed near the top of the back of slopes or on benches in the cut slopes as well as when there is a slope on adjacent ground toward the fill. When the roadway has a steep longitudinal slope, a drain is to be designed and constructed at the down – slope end of the cut to intercept longitudinal flow and carry it safely away from the fill slopes.

5. Avoidance of Social Impacts

To avoid adverse social impacts, the Contractor shall:

1 Coordinate all construction activities with neighboring land uses and respect the rights of local landowner. If located outside the ROW, written agreements with local landowners for temporary use of the property will be required and sites must be restored to a level acceptable to the owner within a predetermined time period.
2 Maintain and cleanup campsites.
3 Attend to health and safety of their worker by providing basic emergency health facilities for workers and incorporate Programs aimed at the prevention of sexually transmitted diseases as a part of all construction employee orientation Programs.
4 Obtain approval of all diversions and accommodation of traffic. A stipulated by section- which states that "the Contractor shall provide the contractor with a written traffic control plan which is to include when and where flagmen shall be employed and when and where traffic cones or other devices such as barricades and \or lights will be used. Where ….traffic diversions area planned for ….additional areas (will) be determined and the diversions clearly defined for travel."
5 Construct and maintain by – passes around bridges to be reconstructed until such time as the bridge is open for traffic. By- passes will be removed and the affected areas re-graded so as to blend in with the existing contour when the bridge is opened.

6. Noise

To avoid adverse impacts due to noise, the contractor shall:

1 Consider noise as an environmental constraint in his planning and execution of the works.
2 Use equipment conforming to international standards and directives on noise and vibration emissions.
3 Take all necessary measures to ensure that the operation of all mechanical equipment and construction processes on and off the site shall not cause any unnecessary or excessive noise, taking into account applicable environmental requirements.
4 Maintain exhaust systems in good working order; properly design engine enclosures, use intake silencers where appropriate and regularly regular maintain noise – generating equipment.
5 Use all necessary measures and shall maintain plant and silencing equipment in good condition so as to minimize the noise emission during construction works.
6 Schedule operations to coincide with periods when people would least likely be affected and by the contractor having due regard for possible noise disturbance to the local residents or other activities. Construction activities will be strictly prohibited between 10pm and 6pm.
7 Incorporate noise considerations in public notification of construction operations and specify methods to handle complaints. Disposal sites and routes will be coordinated with local officials to avoid adverse traffic noise.

7. **Protection of Historic and Cultural resources**

To avoid potential adverse impacts to historic and cultural resources, the contractor shall; in the event of unanticipated discoveries of cultural or historic artifacts (movable or Immovable) in the course of the work, the sub-contractor shall take all necessary measures to protect the findings and shall notify the contractor and provincial- level representatives of the Archaeological committee under the ministry of Information and culture. If continuation of the work would endanger the finding, project work shall be suspended until a solution for preservation of the artifacts is agreed upon.

8. **Protection of Utilities**

To avoid potential adverse impacts to utilities, the Contractor shall:

1 Ascertain and take into account in his method of working the presence of utility services on and in the vicinity of the site.
2 Take into account in his programme the periods required to locate, access, protect, support and divert such services, including any periods of notice required to effect such work in consultation with authorities operating such services.
3 Assume all responsibility to locate or to confirm the details and location of all utility services on or in the vicinity of the site.
4 Exercise the greatest care at all times to avoid damage to or interference with services.
5 Assume responsibility for any damage and \or interference caused by him or his agents, directly or indirectly, arising from actions taken or a failure to take action, and for full restoration of the damage.

9. **Waste Disposal and Hazardous materials**

Water and waste products shall be collected, removed via suitable and properly designed temporary drainage systems and disposed of at a location and in a manner that will cause neither pollution nor nuisance. Insofar as possible, all temporary construction facilities will be located at least 50 metres away from a water course, stream or canal.

The contractor shall not dispose of used pavement material on the road or highway side, nor in water courses or wetlands. Such material shall be utilized or disposed of in places approved by the CSC.

Whenever large amounts of asphaltic concrete are to be removed from a highway, the material should be reused or disposed of by burial to a minimum of one meter depth. The contractor shall not dispose of any surplus material on private land unless authorized by in writing by the owner(s), authenticated before a notary public, and with previous authorization of the CSC.

10. **Environmental Monitoring**

Monitoring or direct impact will be carried out by the CSC and will include, but not restricted to, the following concerns:

1 Erosion along highway segments and borrow sites during and after construction;
2 Silting and increased sediment loads to streams crossed by the highway.
3 Prevention of damage to undiscovered significant archeological or historical findings;
4 Verification that proper waste disposal at construction sites and road camps is done;
5 Assurance that construction sites and road camps are cleaned after construction and
6 Inspection of vegetation covers (removal and re- growth) on the basis of field examinations.

Annex 5: Sample matrix for Environmental and Social Management Plan

Potential Impact	Mitigation Measures	Implementation Schedule	Monitoring Indicators	Monitoring	Responsibility		Frequency
					Implementation	Supervision	
Soil Point source contamination around workshop areas	Ensure immediate clean up of the area by removing the contaminated topsoil and disposing properly in a designated place	During rehabilitation activities	Soil Quality	Monitor and document the contaminated soil disposal procedure	Contractor/ supervising consultant	SPCU/ESMU	Weekly
Water Water pollution due to seepage from tanks (diesel, sanitary wastes etc)	Create barrier for appropriate containment measures	During rehabilitation activities	Water Quality	Monitor BOD, Nitrate, pH, Heavy metals of the nearby water bodies before and during rehabilitation.	Contractor/ supervising consultant	SPCU/ESMU	Weekly
Air Release of dust and PMs	Spray water to control dust	During rehabilitation activities	NOx, SOx, THC and CO	Monitor PM, NOx, SOx, THC and CO in the surrounding air before the rehabilitation and thereafter hourly during rehabilitation works	Contractor/ supervising consultant	SPCU/ESMU	Weekly
Noise Noise resulting from the use of equipment during rehabilitation works	Ensure that efficient equipment are used	During rehabilitation activities	Noise	Monitor noise level daily to ensure that it does not exceed the national acceptable limit	Contractor/ supervising consultant	SPCU/ESMU	Daily
Improved public procurement process Effective and transparent public procurement management	Improved public procurement process	During rehabilitation and operational phases			Respective institution	Respective institution	

Annex 6: List of Stakeholders and Persons Consulted

S/No	Name	Designation	Organization	Phone	Email
NATIONAL PROJECT COORDINATING UNIT, NATIONAL PLANNING COMMISSION ABUJA					
1	Bassey Akpanyung	National Coordinator	NPCU SLOGOR		basseyakpanyung@gmail.com
2	Samuel Eloho	Project Manager	NPCU SLOGOR	08057226948	sam_uye@yahoo.com
3	Dr. Awoyinka Yisa Akanfe	M&E Officer	NPCU SLOGOR	07038185938	ykprogressing@yahoo.com
4	Mr. Sabiu	Accountant	NPCU SLOGOR	08036128464	sabiu123@yahoo.com
5	Patricia Akhigbe	Procurement	NPCU SLOGOR	07038812278	ijebusoruma35@yahoo.com
6	Mr. Barayei Johnson	Communication officer	NPCU SLOGOR	08166190956	
7	Mr. Yahaya Saidu	Assistant Accountant	NPCU SLOGOR	08033110534	saeedyahaya2005@yahoo.com
8	Azubike Nkem	M&E Assistant	NPCU SLOGOR	08059211930	azubuike4ikem@yahoo.com
9	Onyinye Iloegbunam	Admin Assistant	NPCU SLOGOR	08034563908	onyinyeilo@gmail.com
KANO					
1	Ashiru D. Zage	Permanent Secretary	Economic planning and Budget	08065993758	ashiruzage@hotmail.com
2	Muhammad Yaro	Project Coordinator	SPCU	08034533626	Myaro125@yahoo.com
3	Dr. Garba Saleh Ahmad	Director	Min of Environment	08065534852	Garbasakano2@yahoo.com
ANAMBRA					
1	Prof. Chinyere Okunna	Hon. Commissioner, /Chief of Staff	Economic Planning and Budget	08033364322	chinyereokunna@yahoo.com
2	Ifekandu J. C. O.	Acting Project Coordinator	SPCU	08037914125	okeyifekandu@yahoo.com
3	Mr. S.T Ikedinma	Project Officer	SPCU	07032781070	stikedinma@yahoo.com
4	Ifeoma Ezedebego	Procurement Officer	SPCU	08038755161	ifeomaezedebego@yahoo.com
5	Mr. Hilary Obigwe	Accountant	SPCU	08033733750	hobigwe@yahoo.com
6	Dimejesi Nneka	Internal Auditor	Office of the Accountant General	08064219736	dimejesimaryann@yahoo.com
7	Joyce Chinonye Nwanah	Admin Assistant	Office HOS	07033495154	
8	Ofoma Joy	Accounts officer	ASWAMA	08166906856	ofoma@yahoo.com
9	Uzo Nwachukwu	Chief Forest Officer	Ministry of environment	08069562667	Uzoamaka2011@yahoo.com
YOBE					
1	Musa Kadiamshi	Permanent Secretary,	Budget and Economic Planning	08036180178	kkamshi02@yahoo.com musakadiamshi@gmail.com
2	Sani Haruna Jajere	Project coordinator,	SPCU	07032151125	sanijajere@yahoo.com
3	Baba Goni	Procurement officer	SPCU	0803661615	babagonishehu@yahoo.com

	Dapchi				
4	Dauda Idi	Accountant	SPCU	08020938126	daudaspl58@yahoo.com
5	Musa Tela	Internal auditor	SPCU	08124548352.	musatela2012@yahoo.com
6	Abdulhamid Ali Usman	Monitoring and evaluation officer	SPCU	08037898314	Abdulhamidausman@yahoo.com
7	Ali Mai Adamu	Communication officer	SPCU	08065910598	amaiadamu@yahoo.com
8	Dahiru Adbullahi	Acting Director, Environmental Sanitation	Environmental Protection Agency	07034506780.	djmusari@yahoo.com
OSUN					
1	Hon. Wale Bolorunduro	Hon. Commissioner	Ministry of Finance, Economic Planning and Budget	08033357155	walebolorunduro@yahoo.com
2	Olaluwoye Isaac Dayo	Permanent Secretary,	Budget and Planning	08033786337	olaluwoyeoladayo@yahoo.com
3	S .A Aina	Permanent secretary	Finance	08033859027	Leyeaina2006@yahoo.com
4	Adegbite E.A	Director(TPS)	Office of the Accountant general	08033705920	akiribotoone@yahoo.com
5	Ejo Isaac	Head (PFMU)	Office of the accountant general	08033751274	oluwatosineso@yahoo.com
6	Gbenga Feidele	Director budget	Ministry of Finance	08034296150	Fadele.olugbenga@yahoo.com
7	Ayemi Rufus	SSA-DMO	Ministry of Finance	08034974681	Oluyoung4christ02@yahoo.com
8	Ijidele Ijiyemi	Coordinator	SPCU	08035037859	Yemi.ijidele@gmail.com
9	Adeyinka Lateef Ayinde	Procurement Officer	SPCU	08077312866	lateefadeyinka25@gmail.com
10	Ojo L . S	Accountant	SPCU	08050662821	kanmiojo@yahoo.com
11	Falompe M.O	Auditor	SPCU	08030767694	efmoin@yahoo.com
12	Akinbade Oludare	M and E officer	SPCU	08037173540	Oludare_ishola@yahoo.com
13	Oni Olugbenga O.	Communication Officer	SPCU	08062342580	suyiolugbenga@yahoo.com
14	Olutade O. F	Administrative Assistant	SPCU	08062342580	Oluwasegun@yahoo.com
15	Biola Oni	Principal scientific officer	Ministry of environment	08033592274	Abiola_oni@yahoo.com
16	Alesinloye Peter	Environmental Health officer	Osun waste management agency	07080137555	palesinloye@gmail.com
17	Alh. Oyeladun Ganiyu Oladimeji	General manager	Osun Waste Management Agency (OWMA)	08035793997	goyeladun@gmail.com
JIGAWA					
1	Adamu Muhammad Garuba Gabas	Permanent Secretary, Secretary Chair	Budget and Economic Planning; SSC; State Technical	08036832233	garungabas@yahoo.com

			Committee (STC)		
2	Ibrahim Adamu	Interim Project Coordinator	SPCU SLOGOR	08036541588	ibrahimadamuumar@yahoo.com
3	Sani Ahmed Jahun	Accountant General	Ministry of Finance	07038228767	sanje1959@gmail.com
4	Dr Hasanna H. Adamu	Commissioner	Ministry of Environment	08037877323	hussaini_hassana@yahoo.com;
5	Isa M. Nasarawa	Permanent Secretary	Ministry of Environment	08030484544	isamuhnas@gmail.com
6	Garba Halliru Babura	Sole Administrator	Environmental Protection Agency (JISEPA)	08033030828	jisepadutse@yahoo.com
CROSS RIVER					
1	Roy Ndoma Egba	Special Adviser,	Dept. of Intl Dev. Cooperation	08033380626	royrone1966@gmail.com
2	Ntujam Dr. Peter Oti	Special Adviser,	Dept of Budget, Monitoring and Evaluation	08058235962	pitaoti@yahoo.com
3	Mr. Manuel Chris Ogar	Executive Chairman	Internal Revenue	07068202123	ogarmc@yahoo.com
4	Bassey Ebri Asuquo	Coordinator	SPCU SLOGOR	08033570906	crslogor@yahoo.com
5	Emmanuel Okokon	Procurement Officer	SPCU SLOGOR	08032858063	eokokon@yahoo.com
6	John Ekanem	Accountant	SPCU SLOGOR	08033470454	ihnekanem@yahoo.co.uk
7	Dickens Inah Obeten	Internal Auditor	SPCU SLOGOR	08037279534	iiobeten@yahoo.co.uk
8	Mrs. Regina Elu Ogboaka	Monitoring and Evaluation Officer	SPCU SLOGOR		
9	Jerry Ashiple	Communication Officer	SPCU SLOGOR	08052254671	ashijayy2k7@yahoo.com
10	Mrs Helen Etim	Project Finance officer	SPCU SLOGOR	07039558898	hetim@yahoo.co.uk
11	Ettah James	Admin Assistant	SPCU SLOGOR	08029523201	james.ettah@yahoo.co.uk
12	Dr Innocent Eteng	Director Admin	Ministry of environment	07031852011	inoetey@yahoo.com
13	Godwin Ilem	Director EPAD	Ministry of environment	08064355638	onolohilem@yahoo.com
14	Ibiang Ibiang .E.	Deputy Director, Waste Management	Ministry of environment	08056721745	ibiangibiang@yahoo.com