



ADAMAWA STATE MULTISECTORAL CRISIS RECOVERY  
PROJECT (MCRP)

**Environmental & Social Management Plan (ESMP)**

For

**Rehabilitation & Upgrade of Michika Water Supply System**  
SMALL TOWN WATER SUPPLY PROJECTS  
INFRASTRUCTURE PROJECTS UNDER COMPONENT 2  
OF MCRP

**FINAL REPORT**

February 2020

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### **Acronyms and Abbreviations**

ACHPR-	African Charter on Human and Peoples’ Rights
ACRWC-	African Charter on the Rights and Welfare of the
CAT-	Convention against Torture
CBO-	Community Based Organization
CEDAW-	Convention on the Elimination of All Forms of Discrimination against
Women	
CERC-	Contingency Emergency Response Component
C-ESMP	Contractors Environmental and Social Management Plan
CoC-	Code of Conduct
CRA-	Child Right Act
CRC-	Convention on the Rights of the Child
CRPD-	Convention on the Rights of Persons with Disabilities
ESHS--	Environmental and Social Health and Safety
ESMF-	Environmental and Social Management Framework
ESMP-	Environmental and Social Management Plan
ESSU-	Environmental and Social Safeguard Unit
FGD-	Focus Group Discussion
FMEEnv-	Federal Ministry of Environment
FMF-	Federal Ministry of Finance
FMWASD-	Federal Ministry of Women Affairs and Social Development
FPMU-	Federal Project Management Unit
GBV-	Gender Based Violence
GHGs-	Green House Gases
GRC-	Grievance Redress Committee
GRM-	Grievance Redress Mechanism
GRS-	Grievance Redress Service
HSE-	Health Safety and Environment
ICCPR-	International Covenant on Civil and Political Rights
ICESCR-	International Covenant on Economic, Social and Cultural Rights
LGAs-	Local Government Areas
MCRP-	Multi-sectoral Crisis Recovery Project
NDHS-	Nigeria Demographic and Health Survey
NEDC-	North East Development Commission
NESREA-	National Environmental Standards and Regulations Enforcement
Agency	
NGO-	Non-Governmental Organization
OHS-	Occupational Health and Safety
PAP-	Project Affected Person
PC -	Project Coordinator
PCU-	Project Coordinating Unit
PCU-	Project Coordinating Unit
PDO-	Project Development Objective
PIU-	Project Implementation Unit
PPE-	Personal Protection Equipment
RAAMP-	Rural Access and Agricultural Marketing Programme
RAP-	Resettlement Action Plan
RPF-	Resettlement Policy Framework
SEA-	Sexual Exploitation and Abuse
SPC-	State Project Coordinator
SPCU-	State project coordinating Unit
SPIU-	State Project Implementation Unit
SPU-	State Project Unit
TA-	Technical Assistance
TC-	Technical Committee

VAPP-	Violence against Persons Prohibition
VES-	Vehicle Exhaust Screening
VET-	Vehicle Emission Testing
WB-	World Bank

## **Executive Summary**

### **ES 1: BACKGROUND**

Federal Government of Nigeria has received financing from the World Bank (WB) for the implementation of Multi Sectoral Crisis Recovery Project (MCRP) currently in three States of Borno, Adamawa and Yobe. The Project Development Objective (PDO) of the MCRP is to “support the Government of Nigeria towards rehabilitating and improving critical service delivery infrastructure, improving the livelihood of conflict and displacement-affected communities, and strengthening social cohesion in the States of Borno, Yobe, and Adamawa.

Adamawa State is proceeding to undertake among other subprojects a total number of eight (8) intervention under this phase of the MCRP intervention work: rehabilitation work at two (2) location and six (6) construction and upgrade. The proposed project when completed will deliver better access to water supply, will create employment opportunities for skilled and unskilled labour during the construction and operational phases. Also, there are indirect employment opportunities such as food vendors, petty traders and suppliers of raw materials for construction. During the operational phase, job opportunities will be created for maintenance workers and suppliers, waste management companies, etc.

Notwithstanding these positive impacts, the project is envisaged to have limited negative environmental and social impact due to nature of civil works and has triggered four of the World Bank Operational Policies: Environmental Assessment OP 4.01; Natural Habitats OP/BP 4.04; Physical Cultural Resources OP/BP 4.11 and Involuntary Resettlement OP/BP 4.12 are the only World Bank safeguards policies triggered for the proposed project.

The Adamawa State Project Coordinating Unit (SPCU) has prepared this Environmental and Social Management Plan (ESMP) as an instrument whose objective is to address the environmental and social safeguard concerns for the proposed rehabilitation of water supply system sub-project by identifying the potential negative impacts and proffering mitigation for the impacts as well as assigning responsibilities for mitigation and monitoring.

### **ES 2: PROJECT DESCRIPTION**

This project involves rehabilitation, construction and upgrade of eight (8) water supply facilities selected from different LGAs in Adamawa state, while this ESMP is for the rehabilitation of **Michika Water Supply System**. The scope of civil works will include the following:

- Excavation works
- Installation of metal stanchions & tank platform
- Installation of ground and overhead water tanks
- Water scheme installation & expansion of capacity of borehole and tanks, by:
  - Piping & connecting of borehole to tank
  - Purchase & Install solar powered boreholes
  - Purchase & installation of larger capacity of tanks
  - Installation of more reticulation to increase water points
  - Installation of water pumps

### **ES 3: DESCRIPTION OF THE PROJECT ENVIRONMENT**

The water supply sub-projects are located in Gombi, Hong and Maiha LGAs of Adamawa State. Michika water supply project is located in Mickika LGA where majority of the residents are farmers. Other form of occupation carried out include trading and artisanship. Agriculture is therefore, the mainstay of the economy. Crops grown in include guinea corn, millet, maize, rice, wheat, groundnut, cassava, beans and cowpeas. Others are vegetables, onions, okra and tomatoes.

Mitigation measures for envisaged impacts such as dust, noise, traffic disturbance, waste management, health and safety of workers, communities and risk associated with labour influx and sexual exploitation and abuse (SEA) during construction have been addressed in this ESMP.

**ES 4: POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS**

The potential positive environmental and social impacts are listed below:

No.	Impact	Key receptor(s)	Evaluation
1	Improved living conditions in communities	Community leadership and users of general water supply project in intervention areas	The proposed project when completed will deliver these benefits: Better access to water supply and prevention of water borne diseases Improved ability to interact with external visitors meeting with leadership
2.	Employment generation	Community members	The proposed rehabilitation/construction sub-project activities will create employment opportunities for skilled and unskilled labour during the construction and operational phases. Also, there are indirect employment opportunities such as food vendors, petty traders and suppliers of raw materials for construction. During the operational phase, job opportunities will be created for maintenance workers and suppliers, waste management companies, etc.
3.	Improvement in local and national economy	Neighbouring communities, LGA and national economy	The creation of direct and indirect job opportunities during the construction and operational phases of the project will boost the local and national economy
4.	Stakeholders' engagement	State Government, LGAs	Improvement of public goodwill and satisfaction towards governance in Adamawa State.
5.	Improvement in management of resources	Neighboring communities, State Government, MDAs	Provision of a lead way to drive the State Government towards ensuring improved infrastructure
6.	Capacity building and strengthening of institutions	State Government, MDAs	Capacity building through: Strengthening of facility rehabilitation works and supervision systems of personnel involved in sub-project activities, including improvement in institutional responsibilities for construction and maintenance. Transfer of skills

The potential negative environmental impacts include mainly impacts on air quality, soil quality, noise levels, water quality and Occupational health and safety while social impacts include risks of labour influx, child labour, sexual exploitation and abuse, GBV and conflict. These are elaborated in the report.

**ES 5: ENVIRONEMNTAL AND SOCIAL MITIGATION AND MONITORING**

Detailed environmental and social mitigation measures for pre-construction, construction and operational phases have been provided in table below. The environmental and social management actions is estimated at Ten Million, One Hundred and Fifty Thousand, Two Hundred and Fifty Naira Only (₦10,150,250.00), and a Dollar equivalent of Thirty Three Thousand, One Hundred and Seventy Dollars Only (\$33,170.00). This is as shown in Table 13 of this report. The cost of mitigation by the Contractor will be included in the contract as part of the implementation cost by the Contractor. The Adamawa MCRP SPCU will coordinate the implementation of this ESMP in conjunction with the relevant State Ministries.



Budget for ESMP monitoring

#	Item	Cost Estimate	
		Naira (₦)	USD (\$)¹
1	Mitigation	5,650,000.00	18,464.00
2	Monitoring	1,227,500.00	4,011.00
3	Capacity Building (including training on Code-of-conduct)	850,000.00	2,777.00
4	GBV, STIs and HIV Mitigation	750,000.00	2,450.00
5	Grievance Redress Mechanism	750,000.00	2,450.00
	<b>Sub-Total</b>	<b>9,227,500.00</b>	<b>30,155.00</b>
6	Contingency (10% of sub Total)	922,750.00	3,015.00
	<b>Grand Total</b>	<b>10,150,250.00</b>	<b>33,170.00</b>

Currency Unit = Nigerian Naira

US\$1 = N306

### **ES 6: GRIEVANCE REDRESS MECHANISM**

The likelihood of disputes to occur during the sub-project implementation will be greatly reduced because consultations have already been carried out with some of the affected persons. Nevertheless, in the event that grievances arise this redress mechanism has been prepared. A Grievance Redress Mechanism (GRM) is provided in chapter 5, which is anchored on the need to provide a forum locally to receive, hear and resolve disputes arising from construction activities and ESMP implementation in the best interest of all parties to forestall the lengthy process of litigation, which could affect the progress of project.

A GRM has been developed for the entire MCRP, however this GRM will be for the implementation of the Water supply rehabilitation, upgrade and construction sub-project in Adamawa State and will take bearing from the MCRP GRM.

### **ES 7: STAKEHOLDERS CONSULTATION**

Extensive consultation was conducted with relevant stakeholders with details in chapter 6. The Stakeholders Consultation meeting was carried out from September 9 – 14th 2019 in communities within the project area. Concerns centred mainly on time for commencing the civil works as well as involvement of members of the community as skilled and unskilled labour during the civil works. Concerns were noted and responses provided by consultant. Consultation with the stakeholders will continue throughout the life cycle of the project.

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¹ \$1=N306

**Table ES7: Issues & Concerns raised & how they were addressed**

<b>Clarifications, Questions and concerns</b>	<b>How they were addressed</b>
<p>At the different locations, the stakeholders and other community representatives all expressed appreciation for the project and sought clarification on the following:</p> <ul style="list-style-type: none"><li>a) Due to the importance of the rehabilitation proposed the leadership in the community wanted to know when the project will kick off</li><li>b) The women groups &amp; youths wished to know if there is a possibility of the engagement of the women &amp; youth in project activities for employment.</li><li>c) The women want their husbands to be considered for job opportunities when project commences.</li></ul>	<p>The issues were addressed by:</p> <ul style="list-style-type: none"><li>a. The project would begin very soon and the ESMP is to ensure that adequate planning can be put in place before the project commences.</li><li>b. Consideration will be given to women &amp; youths in the communities, especially for unskilled employment opportunities.</li><li>c) The project will consider the husbands (who are also the men from the community), for job opportunities. This will be included in the ESMP for contractors.</li></ul>

## CHAPTER ONE: INTRODUCTION

### 1.1 Background

The Federal Government of Nigeria has received financing from the International Development Association (IDA) (the “Bank”) in the form of a credit towards the cost of the Multi Sectoral Crisis Recovery Project (MCRP). The Government of Nigeria is implementing the Multi Sectoral Crisis Recovery Project (MCRP) in an effort to support recovery and stability in the North East, which is financed by the World Bank. The MCRP was initiated in 2014 and is targeted at three states: Borno, Adamawa, Yobe (BAY) while being monitored at the Federal Level by the MCRP Federal Project Coordinating Unit (FPCU) and implemented through the MCRP State Project Implementation Units (PCU).

The PDO of this project is supporting the Government of Nigeria towards rehabilitating and improving critical service delivery infrastructure, improving the livelihood opportunities of conflict and displacement-affected communities, and strengthening social cohesion in the North East Participating States of Borno, Yobe and Adamawa; In the event of an eligible crisis or emergency, the provision of immediate and effective response to said eligible crisis or emergency, through the proposed Contingent Emergency Response Component (CERC).

Adamawa State is proceeding to undertake among other subprojects a total number of eight (8) interventions under this phase of the MCRP intervention work: rehabilitation work at two (2) location and six (6) construction and upgrade. The proposed project when completed will deliver better access to water supply; will create employment opportunities for skilled and unskilled labour during the construction and operational phases. Also, there are indirect employment opportunities such as food vendors, petty traders and suppliers of raw materials for construction. During the operational phase, job opportunities will be created for maintenance workers and suppliers, waste management companies, etc.

Notwithstanding these positive impacts, the project is envisaged to have limited negative environmental and social impact due to nature of civil works and has triggered four of the World Bank Operational Policies: Environmental Assessment OP 4.01; Natural Habitats OP/BP 4.04; Physical Cultural Resources OP/BP 4.11 and Involuntary Resettlement OP/BP 4.12 are the only World Bank safeguards policies triggered for the proposed project.

The Adamawa State Project Coordinating Unit (SPCU) which is the implementation coordinating agency of the Client has prepared this Environmental and Social Management Plan (ESMP) as an instrument to address the environmental and social safeguard concerns for the proposed rehabilitation of water supply system sub-project, while a stand-alone Resettlement Action Plan (RAP) will also be prepared to address issues such as loss of economic trees, cash crops, loss of assets, economic displacement and minimal land acquisition, associated with Involuntary Resettlement (OP4.12).

### 1.2 Applicable Laws and International Regulatory Framework

A number of national and international environmental guidelines are applicable to the operations of the MCRP. This ESMP is prepared in consonance with relevant Adamawa State and Federal Government policies, laws, regulations, guidelines, and applicable World Bank Operational Policies (See MCRP ESMF). The relevant Federal and State policy and regulatory instruments are summarized in the table 1 below.

Table 1: Relevant Federal/State Policies, Legislations, Regulations & Guidelines

S/N	Policy Instrument	Year	Provisions
1	National Policy on the Environment	1989 revised 1991	Describes the conceptual framework and strategies for achieving the overall goal of sustainable development in Nigeria.
Legal/Regulatory Instrument			

2.	Environmental Impact Assessment (EIA) Act No. 86	1992	Provide guidelines for activities of developmental projects for which EIA is mandatory in Nigeria. The Act also stipulates the minimum content of an EIA as well as a schedule of projects, which require mandatory EIAs.
3.	Land Use Act	1978 modified 1990	The Act vests all land comprised in the territory of each state in the Federation in the Governor of the state and requires that such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provisions of the Act.
4.	Forestry Act	1994	Provides for the preservation of forests and the setting up of forest reserves.
5.	Endangered Species Act	1985	Provides for the conservation and management of Nigeria's wildlife and the protection of some of her endangered species in danger of extinction as a result of over-exploitation
6.	FEPA/FMEnv EIA Procedural Guidelines	1995	The Procedural Guidelines indicate the steps to be followed in the EIA process from project conception to commissioning in order to ensure that the project is implemented with maximum consideration for the environment.
7.	National Guideline and Standard for Environmental Pollution Control	1991	Provide guidelines for management of pollution control measures
8.	S.I.15 National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations	1991	Regulates the legal framework for the effective control of the disposal of toxic and hazardous waste into any environment within the confines of Nigeria.
9.	Urban and Regional Planning Decree No. 88	1993	Planned development of urban areas (to include and manage waste sites).
10.	Workmen Compensation Act	1987 reviewed 2010	Occupational Health and Safety
11.	Child Rights Act	Act No. 26 of 2003	Best interests of a child are to be paramount in all actions and clearly states the rights of the child.
12.	Adamawa State Environmental Sanitation Edicts, Laws and Enforcement Agencies	-	Making and enforcing environmental and health polices and laws

### 1.3 International Treaties and Conventions on Environment

Some of the international Treaties and Conventions on environment to which Nigeria is a party are summarized in Table 2 below.

Table 2: International Treaties and Conventions on Environment to which Nigeria is a Party

S/N	Treaties and Conventions	Year	Agreement
1.	The United Nations Environmental Guidance Principles	1972	Provide guidelines for protecting the integrity of the global environment and the development system
2.	Montreal Protocol on Substances that deplete the Ozone Layer	1987	An international treaty to eliminate Ozone depleting chemical production and consumption.
3.	United Nations Convention on Biological Diversity	1992	Places general obligations on countries to observe sustainable use and equitably share the plants and animals of the earth
4.	United Nations Framework Convention on Climate Change	1994	It calls on developed countries and economies to limit her emissions of the greenhouse gases which cause global warming
5.	Convention on International Trade in Endangered Species of Wild Fauna and Flora	1973	Restricts the trade of fauna and flora species termed as endangered Species
6.	Convention on Conservation of Migratory species of Wild animals (Bonn Convention)	1979	Stipulates actions for the conservation and management of migratory species including habitat conservation
7.	Vienna Convention for the Protection of the Ozone Layer	1985	Places general obligation on countries to make appropriate measures to protect human health and the environment against adverse effects resulting from human activities, which tend to modify the ozone layer.

#### 1.4 Gender-Based Violence

Nigeria has ratified or acceded to the core international human rights treaties and is a party to the major regional human rights instrument which obliged States to respect, protect and fulfill human rights of all persons within the territory and subject to the jurisdiction of the State, without discrimination. Rape may violate several human rights obligations enshrined in the instruments ratified by Nigeria and is also a form of gender-based violence and a manifestation of violence against women. As a State party to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (the "Maputo Protocol"), Nigeria has made legally binding commitments to exercise due diligence to combat gender-based violence and discrimination.

##### 1.4.1 International Treaties Relevant to GBV

- The International Covenant on Civil and Political Rights (ICCPR) (2004)
- The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004)
- The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) (1993)
- The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984)
- The Convention on the Rights of the Child (CRC) (1990), and the Convention on the Rights of Persons with Disabilities (CRPD) (2012)
- International Convention on the Elimination of All Forms of Racial Discrimination (1976)

##### 1.4.2 Regional Treaties Relevant to GBV

- The African Charter on Human and Peoples' Rights (ACHPR) (1982)

- The African Charter on the Rights and Welfare of the Child (ACRWC) (2007)
- The Protocol to the ACHPR on the Rights of Women in Africa (the “Maputo Protocol”) (2007)

#### 1.4.3 National Policies Relevant to GBV

- The National Action Plan for the Implementation of United Nations Security Council Resolution 1325 (2009)
- The National Gender Policy (2010)

### 1.5 International Treaties Relevant to Social Protection

Some relevant international treaties on social protection include

**The International Covenant on Civil and Political Rights (ICCPR) (2004);** which pursues the promotion of self-realization by upholding the right of self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development. Also, all peoples may, for their own ends, freely dispose of their natural wealth and resources without prejudice to any obligations arising out of international economic co-operation, based upon the principle of mutual benefit, and international law. In no case may a people be deprived of its own means of subsistence.

**The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004);** which undertakes to take steps, individually and through international assistance and co-operation, especially economic and technical, to the maximum of its available resources, with a view to achieving progressively the full realization of the rights recognized in the present Covenant by all appropriate means, including particularly the adoption of legislative measures.

**The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) (1993)** that promotes the protection of people from "torture", which means any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person has committed or is suspected of having committed, or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity. It does not include pain or suffering arising only from, inherent in or incidental to lawful sanctions.

**The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984),** discourages the discrimination against women by any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.

**The Convention on the Rights of Persons with Disabilities (CRPD) (2012);** which adopts a broad categorization of persons with disabilities and reaffirms that all persons with all types of disabilities must enjoy all human rights and fundamental freedoms. It clarifies and qualifies how all categories of rights apply to persons with disabilities and identifies areas where adaptations have to be made for persons with disabilities to effectively exercise their rights and areas where their rights have been violated, and where protection of rights must be reinforced.

**International Convention on the Elimination of All Forms of Racial Discrimination (1976),** which discourages any distinction, exclusion, restriction or preference based on race, colour, descent, or national or ethnic origin which has the purpose or effect of nullifying or

impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of public life.

Generally, with regards to environmental and social management issues, legislation is in a continuing process of development in Nigeria. Nevertheless, in the event of divergence between the two, the World Bank safeguard policy shall take precedence over Nigeria EA laws, guidelines for these intervention projects.

## CHAPTER TWO: DESCRIPTION OF THE PROJECT

### 2.1 Description of the MCRP Water Project rehabilitation activities

This project involves rehabilitation, construction and upgrade of eight (8) water supply facilities within selected LGAs in Adamawa state. This ESMP is for the rehabilitation & upgrade of Michika water supply system. This is outlined in Table 3, while Figure 1 shows location of each facility.

Table 3: Water supply Projects and Location

S/No	Sub-projects	Town/LGA	GPS
1.	Rehabilitation and upgrade of Garkida Water Supply System	Garkida/ Gombi	Latitude 12.562E and Longitude 10.40742N
2	Rehabilitation and upgrade of Gombi water supply	Gombi/Gombi	
3.	Rehabilitation of Maiha Water Supply System	Maiha/Maiha	Latitude 13.188418E and Longitude 10.067538N
4.	*Rehabilitation and Upgrade Water Supply Plant, Uba	Uba/Hong	Latitude 13.2286E and Longitude 10.45325N
5.	Construction of New Water Supply Plant, Pella	Pella/Hong	Latitude 12.9342E and Longitude 10.14955N
6.	Rehabilitation and Upgrade Water Supply Plant, Hong	Hong/ Hong	Latitude 13.2286E Longitude 10.45325N
7	<b>*Rehabilitation and upgrade of Michika water supply</b>	<b>Michika/Michika</b>	
8	Rehabilitation of Gulak water supply	Gulak/Madagali	



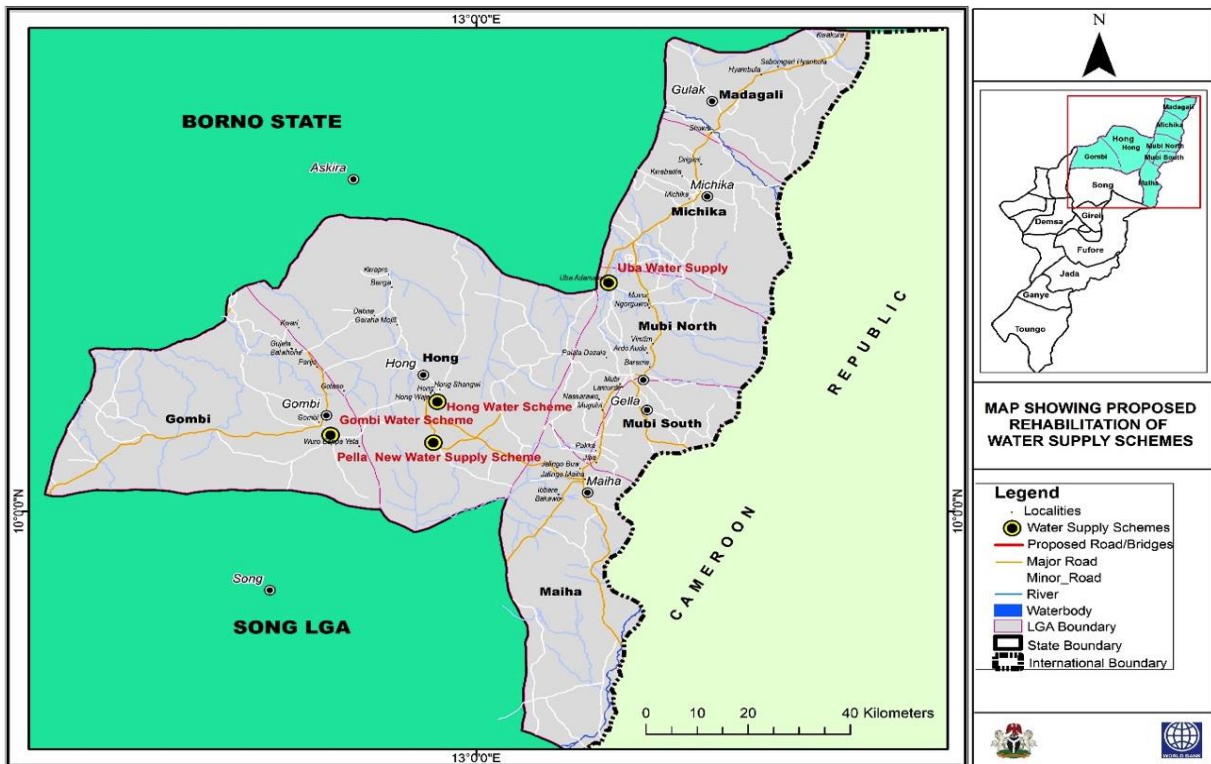


Figure 1: Map of Adamawa State showing small town Water Supply project Locations

The engineering design for the Michika water supply system as shown in Figures 2, 3 and 4 comprises the following components:

- Groundwater tank
- Elevated water tank
- Service building
- Management Building
- Service Building

The scope of works are:

- Excavation works
- Installation of metal stanchions & tank platform
- Installation of ground and overhead water tanks
- Water scheme installation & expansion of capacity of borehole and tanks, by:
  - Piping & connecting of borehole to tank
  - Purchase & Install solar powered boreholes
  - Purchase & installation of larger capacity of tanks
  - Installation of more reticulation to increase water points
  - Installation of water pumps
- Minor civil works comprising:
  - Plumbing
  - Masonry
  - Carpentry for formworks etc.
  - Welding works
  - Electrical connections (for solar)

Table 4: Project activities by phases

<b>Project Phases</b>	<b>Activities</b>
Preconstruction Phase Activities	Preconstruction phase activities include among others: Siting of workers camp, if necessary Economic displacements Mobilization of workforce (labour influx) Removal of trees and vegetation Assessment of existing project location, selection of beneficiary institutions, field studies and environmental screening; Preparation of environmental and social screening reports; Statutory permitting activities from Adamawa WMA/Adamawa State MCRP PCU
Construction Phase Activities	Construction phase activities include among others: Earthworks Water supply rehabilitation work; Mobilization of equipment, materials and personnel to site Pipelaying & reticulation activities Identification of storage area for construction material; Transportation and handling of materials and equipment; Civil & Construction Works Construction of waste bin bays (where applicable); and Disposal of construction waste/rubble and waste in general.
Operations and Maintenance Phase Activities	Operations and maintenance phase activities include: Housekeeping; Waste management (collection and disposal); Maintenance and repair works; and Materials management and storage (including personal protective equipment, etc.).
Decommissioning Phase	Removal of construction equipment; Disposal of construction spoil and waste in general; Dismantling of temporary work camp of the contractor; and Waste management.

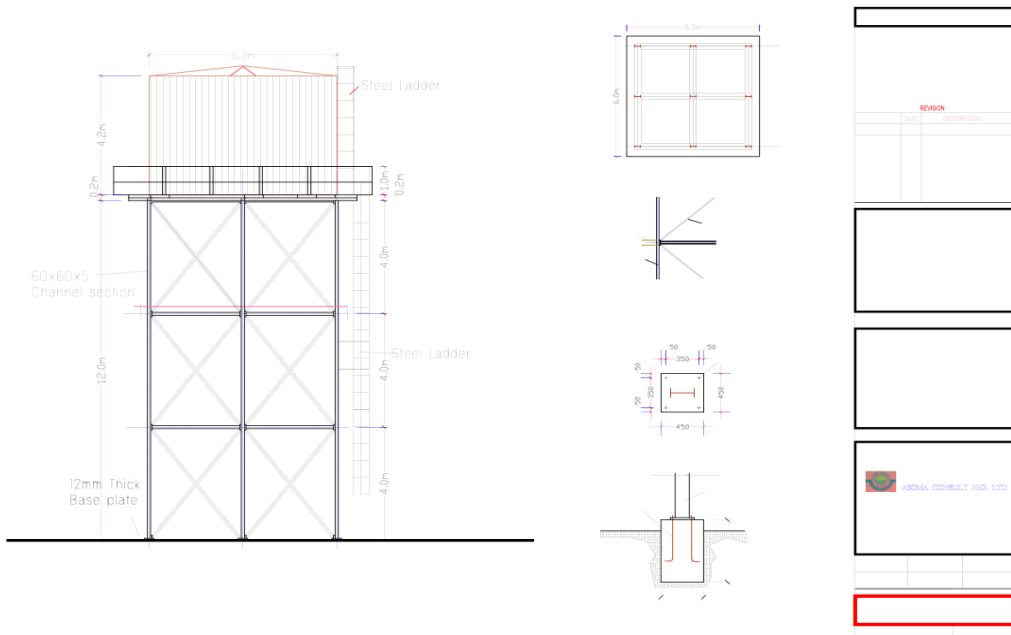


Figure 2: Engineering design of elevated water storage tank

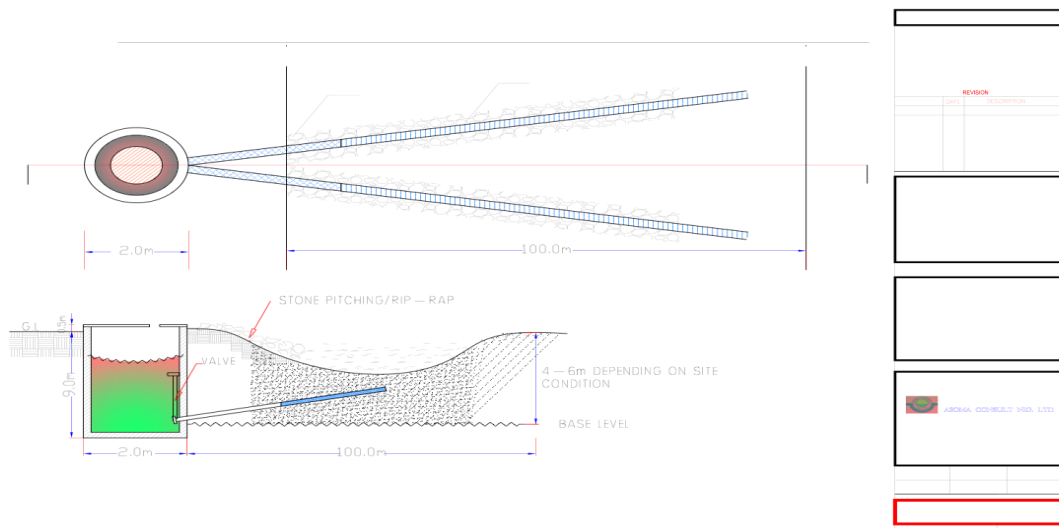


Figure 3: Engineering design of ground level water storage tank

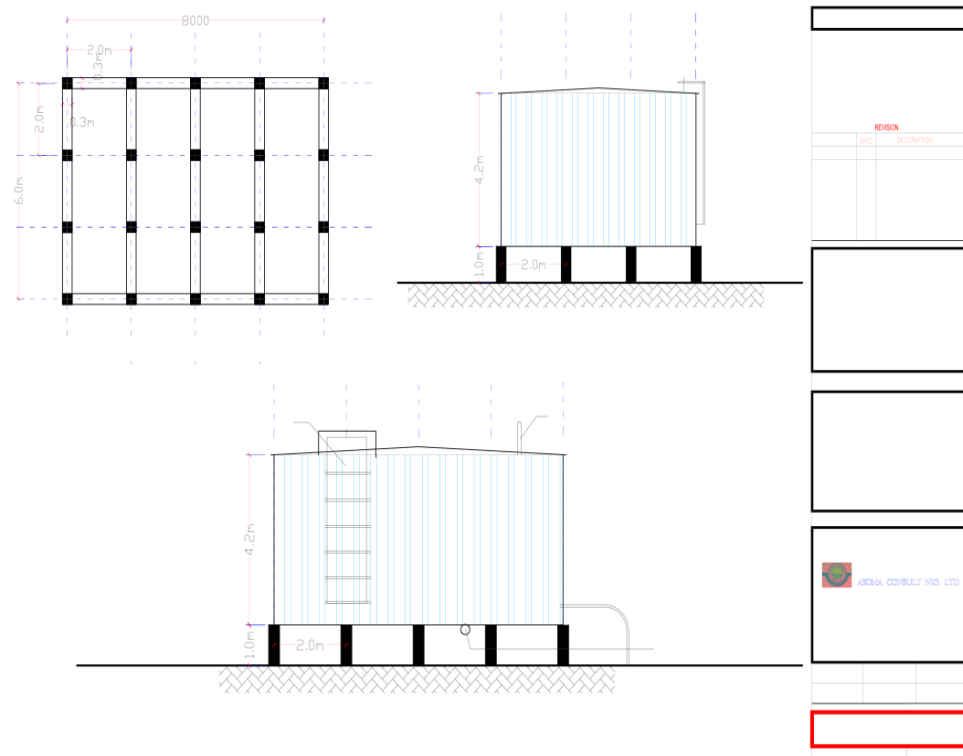


Figure 4: Engineering design of ground level water storage tank

## CHAPTER THREE: DESCRIPTION OF THE PROJECT ENVIRONMENT

### 3.1 Overview of the Project Environment

Adamawa State lies between 8°00'N and 11°N and longitude 11.50°E and 13.50°E sharing borders with Gombe State to the North, and Borno State to the North East, while it is bordered in West by Taraba State and the Republic of Cameroun. The State has a total area of 39, 742.12km<sup>2</sup> and has a projected population of over three million inhabitants. The State has 21 Local Government Areas with Yola as the capital city. The water supply sub-projects are located in Gombi, Hong and Maiha LGAs.



Figure 5: Map of Adamawa State; Source-INEC

#### 3.1.1 Michika LGA

The sub-project is located in Michika LGA, which shares borders with Madagali and Mubi North LGAs. The hydrology of Hong depends on rainfall and underground reservoirs in areas underlain by sedimentary rocks. Water Supply is characterized by hand-pumps borehole either solar powered or mechanical which does not meet the needs of the populace.

### 3.2 Site Specific Environmental and Social Conditions

Site visit revealed some Environmental and Social features within the project areas. These are highlighted in the Table 5. The water supply systems in most of the sites are redundant and needs complete reconstruction and upgrade while others require rehabilitation.

Table 5: Baseline Environmental & Social Conditions of sub-projects

S/No	Sub-projects	Environmental Sensitivities	Social Sensitivities
1.	Rehabilitation and upgrade of Garkida Water Supply System	Occupational health and safety concerns that would be encountered from the dismantling of the overhead tanks	Disruption in water supply for the communities and people that currently rely on the water systems that would be rehabilitated
2	Rehabilitation and upgrade of Gombi water supply		
3.	Rehabilitation of Maiha Water Supply System		
4.	Rehabilitation and Upgrade Water Supply Plant, Uba		
5.	Construction of New Water Supply Plant, Pella		
6.	Rehabilitation and Upgrade Water Supply Plant, Hong		
7	<b>*Rehabilitation and upgrade of Michika water supply</b>		
8	Rehabilitation of Gulak water supply		



Figure 6: Pictures of Some of the project sites

### 3.3 Description of The Physical Environment

The project area of Adamawa State is typical of savannah vegetation with the guinea savannah towards the southern part and Sudan savannah in the north.

#### 3.3.1. Climate

Climate is determined by the interaction of the warm moist Tropical Maritime air mass and the hot and dry Tropical Continental air mass. The two air masses converge along the Inter-Tropical Convergence Zone (ITCZ), which moves in response to the seasonal disposition of the overhead sun.

#### 3.3.2. Rainfall

The distinctly hilly nature of the terrain in Adamawa presents a general topography that has significant impact on the local variations and pattern of rainfall. There are two distinct seasons; the dry and wet season. The rains commence from around April and incidence of rainfall increases till between the months of August and September with levels between 760mm – 1051mm. The rainfall sometimes produces hailstorms. This area falls within the Sudan and Guinea Savannah vegetational zones.

### 3.3.3. Temperature

The rainy season usually ends in the month of November, which indicates the beginning of the dry season. The State falls within the northern part of the country that has experienced a 1.2oC increase in average temperature in studies carried out with data collected between 1900 and 2005. Nevertheless, mean daily temperature could be as low as 20oC during the months of December and January when the cool dry Harmattan wind blows in from the Sahara Desert.

### 3.3.4 Geology

The regional geology of the northern hilly area of Adamawa State is typically characterized by Precambrian Basement Complex rocks while the southern part is characterized by cretaceous sedimentary formation, as part of the sedimentary basin of the Benue-Niger trough, comprising different types of basement complex rock formations such as older granite rocks, migmatites-gneiss-quartzite rocks and meta-sediments. Hydrogeologically, the hand-dug wells in the project area derive their water sources from regolith aquifer while secondary porosity and permeability initiated by fractures account for the groundwater storage and yield.

### 3.3.5. Soils

The northern part of Adamawa State is characterized by sandy soil, which has been developed in the northern part of Nigeria due to long dry season, erosion of the basement complex rock, coupled with the sandy dust particles transported from Sahara Desert by wind. Towards the lower part of the State is the interior zone of laterite soil formed by accumulation of iron and aluminum mineral components derived from the leaching of other chemical elements from the upper-most horizons. This, therefore, represents an interface between intensive chemical weathering of rocks, and an active surface and subsurface denudational system, which is fueled by intensive rainfall and rapid runoff.

### 3.3.6. Hydrology

Adamawa State is in the Upper Benue hydrological Area (HA III) of Nigeria and is dominated by two major rivers; the Benue and the Gongola Rivers. This area usually has water quality that is potable in the upper zone aquifers, while in the middle level aquifers water quality is usually bicarbonate water containing  $SO_4$ ,  $HCO_3$  and possessing a salinity of 194-1065mS/cm. Hong and Gombi are drained by Kilanye & Shashu rivers.

### 3.3.7. Drainage

Drainage pattern is usually typified by irregular stream branching with tributaries joining the main water body, River Benue having steep vertical banks up to 6m in the upper reaches. Several of the streams experiences flash flooding during the wet season. The Benue floods begin in September, peaks in November, and finishes by May.

### 3.3.8. Ecological Problems

The Sudan and the Sahelian Savannah make up the semi-arid areas with low rainfall land sparse vegetation. They lie within latitudes 120 N and 140 N. Averagely, annual rainfall in these zones varies from as low as 250 mm in the far North Eastern part to 750 mm in the southern part. Rainfall in the northern region is largely erratic. The southern parts are usually humid, while the middle belt has moderate rainfalls with derived vegetation as well as sub-humid. It is estimated that Nigeria is currently losing about 351,000 hectares of its landmass over rampaging desert conditions annually, and such conditions are advancing southwards at the rate of about 0.6km per year. Desertification, which is affecting 11 of the northern States, including Adamawa State, is considered as the most pressing environmental problem and accounts for about 73% out of the estimated total cost of about US\$5.110 billion<sup>2</sup> per annum the country is losing to environmental degradation.

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<sup>2</sup> Nwokocha CO (2017) The Challenges Facing the Effective Implementation of Drought and Desertification Policy in North-East Geopolitical Zone of Nigeria. Arts Social Sci J 8: 289. doi:10.4172/2151-6200.1000289



### 3.4 Description of The Socio-economic Environment

Socio-economic survey was done in order to collect the baseline information of the project area. In order to achieve the objectives of the study and the approach adopted involved a combination of the following:

- Questionnaire administration for data collection on existing livelihood opportunities, income, gender characteristics, age profile, health, transport access
- Focus group discussion (FGD), conducted to obtain information about the analysis of existing formal and informal grievance redress mechanisms, the fears and expectations of the people
- Key informant interviews to elicit in-depth information about community structure, norms and values, among others
- Participant observation and estimation

A summary of socio-economic survey carried out in the project areas is summarized in the table below.

Table 6: Socioeconomic characteristics of Project Area

Description	Category	Percentage	Summary
<b>Sex</b>	MALE	86	This indicates that the men will provide sufficient human capital from the communities that the contractor can recruit personnel for the execution of this project.
	FEMALE	14	
<b>Length of Stay in Community</b>	From Birth	99.0	Result shows that respondents having spent most of their lives in the communities will be able to provide concrete information.
	Above 15 years	1.0	
	10-14 years	0	
	5-9 years	0	
	Below 5 years	0	
<b>Religion</b>	Islam	51.0	Result shows that there is close ration of Christianity (48%)and Islam (51%) within the project areas
	Christianity	48.0	
	Others	1.0	
<b>Marital Status</b>	Married	59.2	Result shows that majority are married indicting the high positive impact of the water supply project to households.
	Single	30.8	
	Widowed	0	
	Divorced/Separated	10.0	
<b>Occupation</b>	Civil Servants	7.5	Result shows that majority are farmers and water will go a long way to improve their farming activities as well as domestic purposes.
	Fishermen	0	
	Farmers	46.7	
	Self employed	12.5	
	Traders	33.3	
<b>Income Level/weekly</b>	Below 500	0	This suggests that the average income band in the
	500-900	0	

	1000-5000	90.0	communities surveyed is N1000-N5000 and will therefore guide the contractor in determining remuneration considerations for workers on this sub-project
	6000-10000	4.2	
	11,000 +	5.8	
<b>Educational Level</b>	Uneducated	40.8	Majority do not have formal education and it suggest the need to apply caution during consultations so as to deliver project information in a way and manner that the beneficiaries will understand
	FSLC	20.0	
	WASC/SSCE	13.4	
	Islamic Studies	0	
	Higher Certificate	25.8	
<b>Number of Children</b>	1-2	44.7	Result shows that household heads have dependents and this will add to the degree of impact on the households
	3-4	22.4	
	5-6	24.7	
	Above 6	8.2	

Source: Field Survey, August 2019

#### 3.4.1 Infrastructure

Most of the respondents in the communities (44.6%) in the project area rely on water from the river or streams for their basic needs, while many (32%) have access to water hand pumps. 74% of the respondents do not have constant electricity available to them whereas, 26% of the respondents have occasional electricity available in their community. Alternative sources of electricity generation in the communities include use of small generator set (especially for barbers and kiosk owners).

Road transportation by the means of the popular ‘keke NAPEP’ is the most common means of movement in the area surveyed. The response on the nature of roads leading to most of the communities & villages within the survey area indicated that majority of roads were rated as in fairly good condition (65.6%) and however in need of repair.

#### 3.4.2 Land Use

The rural-urban interdependence and interaction in Adamawa is characterised by the flow of people (migration), natural resources, agricultural commodities and services, information and money, or in the form of income diversification such as urban agriculture and non-farm rural employment between rural and urban areas (Tacoli, 2002). Nevertheless, in the rural areas of the project area, land use is basically agricultural and residential with a small commercial and cultural mix; which would consequently imply that land acquisition concerns would have more impact on economic crops & residential properties.

#### 3.4.3 Land Tenure

In general, traditional land tenure was based on customary laws under which land was considered community property. An individual had usufructuary rights to the land he farmed in his lineage or community area. He could possess the land as long as he used it for the benefit of his family or society and he could pass the land on to heirs and pledge its use to satisfy a debt, but could not sell or mortgage it. The right of disposal belonged only to the community, which, acting through traditional authorities, exercised this right in accordance with customary law. Tenant farming is widely practiced in the Mubi LGA (Northern Adamawa). This customary tenure system happens when families seek to farm on land in a community dominated by another lineage. In communal systems, arrangements are usually made with the village chief, which in turn assigns the tenant land in exchange for periodic tribute.

### **3.5 Gender and Gender-Based Violence Information**

Nigeria ranks 118 out of 134 countries on the Gender Equality Index.<sup>3</sup> Women's disadvantaged position and lack of decision-making power in the social, economic and political spheres is reflected in policies, laws and resource allocation that thwart progress towards gender equality in the country. More than 70 percent of women live below the poverty line, and maternal mortality ratio is among the highest in the world at 576 per 100,000.<sup>4</sup> More than half of people living with HIV (3.2 million) are women (55 percent).<sup>5</sup> Girl enrolment in school lags behind boys, and represents one third to one quarter of classroom participants depending the state; and two-thirds of the 10.5 million out-of-school children, are girls.<sup>6</sup>

The wide diversity and distinct socio-economic, cultural and political contexts across Nigerian geopolitical regions and states results in different gender related vulnerabilities. While gender inequitable norms prevail throughout the country, these vary by region and interact with other structural, community and individual factors exposing women, girls and boys to some forms of GBV more than others. The socioeconomic status of women and girls in the northern zones lags behind those in the south: only 3 percent of girls in the North complete secondary school, over two-thirds aged 15-19 years are unable to read compared to less than 10 percent in the South, and 76 percent are married by age 18 in the northwest.<sup>7</sup> Child marriage, acceptance of wife beating, restricted movement of women and girls are more pronounced in the North, and the prevalence of sexual violence, conflict related GBV and SEA is higher than in the South. In the South FGM, IPV, physical violence by any perpetrator, trafficking and harmful widowhood practices are more prevalent.

The term 'gender-based violence' reflects the underlying and systemic gender inequality which is a key driver of violence. Gender inequality exists in Nigerian households and communities, as in every society in the world; it results in women and girls experiencing limited choices, as well as restricted access to resources and opportunities compared to men and boys. The unequal distribution of power between men and women, along with engrained norms and rigid expectations on gender roles are the core drivers of GBV. GBV cuts across culture, level of education and income, religion, ethnicity, and other demographic indicators.

Nigeria's national government has taken steps to penalize and address GBV and SEA, although a clear leadership with the leverage to garner multi sectoral support to address this complex problem seems absent. The institutional champion of women's and children's rights and GBV issues within the government is the Federal Ministry of Women Affairs and Social Development (FMWASD). But it has limited influence on sectoral ministries who need to enforce policy, insufficient budgetary resources<sup>8</sup> and insufficient institutional capacity to enact its mandate.

The regulatory framework to address both GBV, SEA and VAC is uneven because the Nigerian legal system is plural, and different legal systems co-exist, namely, the statutory law, Sharia law in the northern regions, and customary law in rural areas. The simultaneous application of this three-tier system creates differentiated degrees of protection to women's and children's rights<sup>9</sup> which varies in every state and its enforcement is weak. There is a lack of clear mandates regarding which institutions oversee child protection and the design and implementation of violence prevention strategies and provision of services. Insufficient budget allocation both at national and state levels, coupled with inadequately trained and staffed structures to provide social welfare, justice, education and health services that are women, child and survivor centered.

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<sup>3</sup> British Council Nigeria. Gender in Nigeria report 2012; UNDP Human Development Report 2016. See: <http://hdr.undp.org/en/content/gender-inequality-index-gii>.

<sup>4</sup> The 2013 Nigeria Demographic and Health Survey (NDHS). See: <https://dhsprogram.com/pubs/pdf/PR41/PR41.pdf>.

<sup>5</sup> UNAIDS 2017 Data. See:

[http://www.unaids.org/sites/default/files/media\\_asset/20170720\\_Data\\_book\\_2017\\_en.pdf](http://www.unaids.org/sites/default/files/media_asset/20170720_Data_book_2017_en.pdf).

<sup>6</sup> NDHS 2013.

<sup>7</sup> NDHS 2013; British Council Nigeria, 2012.

<sup>8</sup> UN Women data from 2011.

<sup>9</sup> UN CEDAW 2017.

While efforts to provide GBV survivors with basic response services is concentrated in the NE by international non-governmental organizations or the UN system, there are very limited government or non-governmental services in the rest of the country, those that exist are for the most part unregulated, uncoordinated and unpredictable.<sup>10</sup> This is aggravated by a generalized lack of trust of citizens, particularly women, in the criminal justice system to enforce the existing laws. Moreover, lack of awareness of laws and knowledge of rights, amidst a context dominated by social norms that legitimate the perpetration of abuse, stigma and underreporting, results in the consequent impunity of perpetrators, possible re-victimization of survivors and the reproduction of the cycle of violence.

Two key national laws address GBV, the Child Rights Act (CRA, 2003), and the Violence Against Persons Prohibition Act (VAPP, 2015) which have been passed by the Federal Capital Territory (FCT) but not by many of the 36 states, making them inapplicable in those that haven't adopted them. While CRA has been passed in 24 states, VAPP has been passed in 4 states in addition to the FCT. Where laws are domesticated, implementation remains weak as institutional capacities are weak (social welfare, police, family courts). In practice, the legal and judicial systems provide women and children with little protection against violence, and timely and adequate support services are scarce and often ill-equipped to respond to survivors' needs.

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<sup>10</sup> UNICEF 2018.

## **CHAPTER FOUR: ENVIRONMENTAL IMPACT MITIGATION AND MONITORING PLAN**

### **4.1 Background**

The project is envisaged to be hugely beneficial to the participating communities and the state at large. The scale of the subproject is such that severe negative impacts are not anticipated. The negative environmental and social impacts will be localized in spatial extent, short in duration and can be reduced or minimized through compliance with the implementation of the appropriate mitigation measures contained in table 7 below.

**Table 7: Environmental and Social Management and Monitoring Plan**

No	Project Activity	Potential Impact	Proposed Mitigation Measures/ Actions	Responsibility for mitigation	Cost (NGN)	Parameters to be Measured	Method of Measurement	Performance Indicator	Frequency & Location of Monitoring	Responsibility for Monitoring	Cost of Monitoring (NGN)
I. Pre-Construction Phase											
A. Environmental											
1a.	Mobilization of materials, construction equipment, machinery, heavy duty vehicles and violation of workers' camp for Upgrade/ rehabilitation of water supply systems	Use of poor quality material that can lead to accidental collapse of Storage tank	*Ensure design clearly defines type and quality standards of material required and properly shows safety features of buildings and other ancillary facilities *Undertake proper integrity test of materials that would be used for construction *Carry out soil tests and material tests for load bearing capacity *Ensure design also has flood protection measures to address overflows or accidental collapse of tanks	Contractor	175,000	Evidence in design  Samples of materials for tests	Integrity & load bearing capacity tests results	Zero safety Incidents	Once before procurement supply	Environmental & Social Safeguard	50,000
1.		Deterioration of	Maintain equipment & machinery to	Contractor	250,000	Air quality	In-situ measurem	FMEEnv permissibl	Weekly in the	Environmental & Social	50,000

	Mobilization of construction equipment, machinery, heavy duty vehicles and violation of workers' camp for Upgrade/rehabilitation of water supply systems	local air quality due to the emission of dusts & gases	manufacturers' specifications by regular servicing to reduce carbon emissions. Use water to wet active areas for dust suppression. Conduct regular visual inspection of dust pollution and ensure appropriate intervention if dust levels are high. Train drivers/workers on proper operation of vehicles and equipment to include fuel efficiency and anti-idling. Ensure no burning of waste on sites Use of tarpaulins to cover trucks transporting earth materials or spoils Ensure rehabilitation of disturbed areas once completed Provide and enforce the usage of appropriate PPE			parameters ((CO, NO <sub>2</sub> , SO <sub>2</sub> , CO <sub>2</sub> , SPM) Maintenance records Driver's training records  Usage of appropriate PPE	ent.  Visual observation of records & interviews	e limit	surrounding communities	Safeguard Officers,  Adamawa State Ministry of Environment (ASME)	
2.		Noise and vibration	Select and use vehicles/equipment	Contractor	300,000	Noise level test	In situ measurement	Noise level at sensitive	Weekly at	Environmental & Social	75,000

		<p>disturbances from operation of heavy-duty vehicles</p> <p>Traffic congestion and risk of road traffic</p> <p>Green House gas Emissions (GHGs)</p>	<p>with lower sound power levels. Install suitable mufflers on engine exhausts and compressor components.</p> <p>Enforce appropriate speed limit to reduce vehicle noise levels.</p> <p>Restrict noise-generating activities strictly to normal working hours (i.e. 9am – 5pm).</p> <p>Respond promptly to noise complaints.</p> <p>Provide and enforce the usage of hearing protection devices (ear plugs/muffs) for workers.</p> <p>Install appropriate safety signage and/or use signalers at strategic locations.</p> <p>Inform local communities in advance of road diversions &amp; major activities likely to affect traffic.</p> <p>Enforce road safety standards, traffic rules including speed</p>			<p>(Not to exceed 80dB(A) for 8 hours working period Usage of appropriate PPE</p>	<p>ent</p>	<p>receptors not to exceed FME<sub>env</sub> recommended level (90 dBA) for an 8 hour period</p>	<p>Construction site and nearby communities</p>	<p>Safeguard Officers,</p> <p>Adamawa State Ministry of Environment (ASME)</p>	
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			<p>limits                  Schedule large and slow moving vehicles for off peak period                  Have in place a traffic Management Plan (TMP)                  *Maintain equipment &amp; machinery to manufacturers' specifications by regular servicing to reduce carbon emissions.                  *Train drivers/workers on proper operation of vehicles and equipment to include fuel efficiency and anti-idling                  *Ensure no burning of waste or any material on sites.</p>								
3.	<p>Site clearing for staging area</p> <p>Mobilization of Machinery, Plant &amp; Equipment</p>	<p>Occupational accidents and injuries to workers and risk to community health and safety</p>	<p>Develop and implement a project specific Occupational Health and Safety Plan (OHSP). OHSP to include but not limited to:                  Cordon off project site to prevent intrusions from general public</p>	Contractor	312,500	<p>Clearly defined boundaries of protected areas</p> <p>Evidence of re-vegetation</p>	<p>Visual observation; and</p> <p>Biodiversity survey</p>	<p>Available number and diversity of plant species within baseline conditions</p>	<p>Weekly at construction area</p>	<p>Environmental &amp; Social Safeguard Officers</p> <p>Adamawa</p>	100,000

	<p>Use of tools – pipe wrenches, pipe saws, nails, blades etc.</p> <p>Welding of pipes &amp; metal</p>	<p>Traffic safety</p>	<p>Prohibition of drug and alcohol use by workers while on the job.</p> <p>* Develop and implement a traffic management plan (TMP-annex 5) by:</p> <p>*Providing traffic flag men</p> <p>*Developing an MOU with Traffic Unit of Police department for support &amp; training of traffic flag officers</p> <p>Provision of adequate first aid, first aiders, PPE, signage (English and Hausa languages).</p> <p>Restriction of unauthorized access to all areas of high risk activities</p> <p>Provision of specific personnel training on worksite OHS management</p> <p>Prepare Instructions manual for Welding works</p> <p>Provide welding goggles &amp; gloves as minimum PPE for</p>	<p>500,000</p>		<p>Evidence of Erosion control measures drainage</p>		<p>Implement Traffic management plan</p>		<p>State Ministry of Environment (ESME)</p>	
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			<p>welding works</p> <p>Ensure that staging areas for contractor equipment are adequately delineated and cordoned off with reflective tapes and barriers</p> <p>Any uncovered work pits should have appropriate signage and protection around them</p> <p>Workers should get a daily induction/toolbox before going on the site and a refresher of what happened on site a day before</p> <p>Adequate safety signage on construction sites should be installed to alert community/drivers/pedestrians</p> <p>lighting and/or reflective tapes and signage integrated in all worksites for safety at night</p> <p>appropriate security measures in place to prevent harassment</p>								
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			or kidnapping of workers								
4.	Mobilization of personnel	Increase demand on existing community health and sanitation infrastructure	Establish worker's camp and provide all basic amenities (water, sanitation etc.). Prohibit workers from unauthorized access to community infrastructure	Contractor	325,000	Availability of amenities in workers' camp	Visual inspection	Public perception	Monthly at project site and surrounding communities	Environmental Safeguards Officer  Adamawa State MCRP  Adamawa LGA	100,000
5.	Site clearing for staging area & Workers camp  Mobilization of Machinery, Plant & Equipment	Loss of vegetation, removal of trees and shrubs and habitat destruction	Restrict removal of vegetation and trees to the area of need only. Protect all vegetation not required to be removed against damage; Undertake quick re-vegetation of exposed soils with indigenous plant species once construction is completed. Ensure construction of effective drainage system and use erosion protection structures such as riprap, gabions etc.	Contractor	300,000	Clearly defined boundaries of protected areas  Evidence of re-vegetation  Evidence of Erosion control measures drainage	Visual observation; and	Available number and diversity of plant species within baseline conditions	Weekly at construction area	Environmental Safeguards Officer  Adamawa State MCRP	60,000
6.	Site clearing for staging	Landscaping	Ensure staging area site considered is in a	Contractor	200,000	Clearly defined	Visual observation	Available number	Monthly at	Environmental Safeguards &	480,000

	<p>area</p> <p>Mobilization of Machinery, Plant &amp; Equipment</p> <p>Supply of materials - pipes &amp; metal stanchions (for tank platforms), sand etc.</p>	<p>disruption and visual intrusion</p>	<p>place jointly agreed between PCU and community</p> <p>Restrict removal of vegetation and trees to the area of need only.</p> <p>Protect all vegetation not required to be removed against damage.</p> <p>Wherever possible, avoid the removal of existing mature trees, which form important visual focal points.</p> <p>Ensure rehabilitation of disturbed areas once completed to restore the visual and landscape integrity of the area.</p> <p>Remove all temporary structures, waste, equipment and vehicles from site immediately after construction</p> <p>Ensure materials (pipes &amp; metal) are kept in a safe &amp; dry location &amp; cordoned off to prevent damage from</p>			<p>boundaries of protected areas</p> <p>Evidence of re-vegetation</p>	<p>on; and</p> <p>Biodiversity survey</p>	<p>and diversity of plant species within baseline conditions</p> <p>Site restoration and zero of materials &amp; equipment on site after construction</p>	<p>construction area</p>	<p>Social Safeguards Officer</p> <p>Adamawa State MCRP</p>	
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			corrosion or theft								
B. Social											
7.	Siting of workers camp  Land acquisition for camp	Unauthorized movements of construction workers, construction equipment, machinery and heavy duty vehicles (during and after working hours) could result in trespassing, Conflict arising from land acquisition Damage to local land and property and create	Pay full compensation for land acquired if land is privately owned, leasehold or other legally binding rental payment Explore all available options while selecting worker's camp with the objective of avoiding or minimizing negative impacts on communities and maintaining constructive relationships between local communities and worker's camp Enforce a 'closed' camp policy unless otherwise agreed and approved. Workers shall comply with the agreed camp closure hours. Contractor shall implement suitable measures to maintain the closed camp policy, which may include perimeter	Contractor	450,000	No of grievance s/ Disputes reported	Grievance assessment	Record of grievances resolved	Weekly site activities	Social Safeguard officers of PCU  Grievance Redress Committee	50,000

	amongst local residents a sense of their privacy being invaded. Residents may feel vulnerable and there may be increasing incidents of crime and or violence and threats to the safety of community members. Disparity of pay, increase in disposable income and potential availability of illegal	security fences, security controls and guardhouses, monitoring transfer of goods into and out of camps for contraband and stolen goods. *Contractor shall have a Project Security Management Plan and should refer to it always. *Contractor, as appropriate, shall provide adequate recreation facilities for workers to reduce incentive for leaving camps during leisure time. *Contractor shall limit workers interaction with the community when outside the camp e.g., by organizing transport directly to and from the worksite. If community members or local businesses express grievances in relation to camp related								
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		substances, illicit or culturally inappropriate lifestyle choices, leading to increased tension between local communities and the workers at camps.	activities/operations, the Project shall respond to the grievance in accordance with the grievance procedure outlined in the GRM and the Community Grievance Procedure contained in the Stakeholder Engagement Plan (SEP).								
8.	Preparation of Staging areas	Increased security risks due to storage of materials and equipment on site	Deploy competent security personnel to secure project site. Provide adequate training of security personnel. Share information related to site security arrangements with the Police and vigilante security (if any).	Contractor	100,000	No of security personnel engaged	Records and Interviews	Zero security incidents	Monthly at Construction site and surrounding communities	Environmental & Social Safeguard officers of PCU  Local Vigilante  Police	60,000
9.	Labour influx from employment on project	Threat to community culture, safety and security	Ensure community have priority opportunity to employment for skilled and semi-	Contractor	275,000	Workers manual, employment codes etc.	Visual observation and interviews	Community perception and level of	Monthly at Construction site and	Social Safeguards Officer – PCU	50,000



		due to presence of workers	<p>skilled work</p> <p>Promote equal opportunities for employment for all (both male &amp; female)</p> <p>Develop an induction program including a code of conduct for all workers. The code of conduct will address the following aspect: Respect for local residents; No hunting or unauthorized taking of products or livestock; Zero tolerance of illegal activities such as child sexual exploitation and underage sex, prostitution, harassment of women, gender based violence, purchase or use of illegal drugs, fighting; Disciplinary measures and sanctions (e.g. dismissal) for infringement of the code of conduct and/or company rules; Commitment /</p>			<p>Level of awareness of local culture by migrant workers.</p> <p>Grievance Redress System</p> <p>Ratio of migrant to local workers</p> <p>Presence of security personnel</p>		satisfaction.	surrounding communities	<p>Adamawa LGA</p> <p>Police</p>	
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			<p>policy to cooperate with law enforcement agencies investigating perpetrators of crimes including gender-based violence.</p> <p>Provide cultural sensitization training to improve awareness of workers to local cultures, traditions and lifestyles.</p> <p>Prohibit child and forced labour.</p> <p>Ensure contractor staff are informed of legal consequences of child labour to discourage practice</p> <p>Ensure non-compliance cases have severe consequences</p> <p>Employment process to include procedures for engagement where ID showing verified date of birth are mandatory</p> <p>Implement community-based Grievance Redress Mechanism</p> <p>Limit the number of</p>								
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			migrant workers by engaging local workers. Engage competent security personnel.								
II. Construction Phase											
A. Environmental Issues											
10.	Use of Workers Camp/Site Office	Generation of sanitary waste	Ensure provision of sanitary facilities on site for workers and enforce usage. Ensure usage of Adamawa waste management agency approved vendor for waste evacuation & disposal.	Contractor	300,000	Presence of functional sanitary facilities on site Waste vendor licenses and waste evacuation documentation	Visual Observation  Interview	National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations 1991.	Weekly at Project Site	Environmental & Social Safeguard Officers  ADAMAWA ESWAMA	75,000
11.	Use of haulage trucks for sand & materials supply	Public safety, road accidents leading to injuries and fatalities	Train drivers on defensive driving Conveyance of materials to site shall be by appropriate transportation means to prevent damage or accidents Provide road signs and flag persons to warn of dangerous conditions of conveying materials	Contractor  PCU Safeguards Team	No additional cost	Availability of up to date drainage maps of metropolises/ project area	Visual Observation	Complaints on disruptions	Weekly at project site	Environmental & Social Safeguard Officers  Drainage dept. of Adamawa Ministry of Environment	No additional cost

			such as the water trucks								
12.	Use of generators for power supply  Use of welding equipment for reticulation pipe-welding & metal works  Sourcing of materials	Public safety, road accidents leading to injuries and fatalities  Public safety, emissions of Carbon monoxide	*Develop and implement a project specific Occupational Health and Safety Plan (OHSP) *Ensure QA/QC control is established on inspection of materials, which are to be of best quality to prevent defective outcomes on construction sites *Ensure generator or welding equipment is operated by dedicated trained personnel *Carry out regular servicing of generator to reduce release of harmful emissions *Mandatory use of minimum PPE for use of welding equipment	Engineering Consultant/ Ministry of Works & Transport  Environmental Safeguards Specialist	300,000	Availability of an Occupational Health and Safety Plan (OHSP).  Availability of QA/QC plan for the works	Procurement planning procedures		Daily at project site	Environmental & Social Safeguard Officers	50,000
13.	Groundworks and earthworks works	Soil impacts and sediment transport	Vegetation (grasses) shall be cleared only when contractor is fully mobilized for construction. Vegetation clearance	Contractor/  Engineering Consultant	No additional cost	Developed site Reclamation Plan	Visual observation	Materials sourced from licensed quarries	Quarterly at material borrow sites and Project	Environmental & Social Safeguard Officers	

		<p>Risk of exacerbating erosion concerns</p> <p>Land degradation and increased susceptibility to erosion due to sourcing of construction materials</p>	<p>(where necessary) and excavations shall be limited to the demarcated construction site.</p> <p>Backfill with excavated soil material where appropriate.</p> <p>Ensure that heaped sand delivered for concrete mixing/construction works is covered with tarpaulin to prevent wind and water transport of soil particles.</p>			Spoil management			site	Adamawa State Ministry of Environment (ASME)	
14.	Transportation of materials and equipment;	Air quality deterioration	<p>Deliver equipment necessary for construction and other materials when community is less likely to be impacted by dust from moving machinery, such as in the evenings or on weekends.</p> <p>Impose a speed limit for all vehicles and construction equipment shall be</p>	Contractor	See I.A.1	<p>Air quality parameters ((CO, NO<sub>2</sub>, SO<sub>2</sub>, CO<sub>2</sub>, SPM)</p> <p>Maintenance records</p> <p>Driver's training records</p>	<p>In-situ measurement.</p> <p>Visual observation of records &amp; interviews</p>	FME <sub>env</sub> permissible limit	Weekly in the surrounding communities	<p>Environmental &amp; Social Safeguard Officers,</p> <p>Adamawa State Ministry of Environment (ASME)</p>	See I.A.1

			<p>less than 30km/h within the transmission pipelines premises and less than 50km/h within communities.</p> <p>Haulage trucks carrying sand shall be covered with tarpaulin.</p> <p>Develop proper excavation procedures for workplace</p> <p>Hydraulic concrete mixing machines shall be used as much as possible and regularly service all construction equipment and machinery.</p> <p>Fit all heavy equipment and machinery with air pollution control devices, which are operating correctly.</p>			Usage of appropriate PPE					
15.	Transportation of materials and equipment e.g. welding	Vibration and noise nuisance	<p>Carry out regular servicing of all equipment and machinery.</p> <p>Maintain maximum sound levels not</p>	Contractor	See I.A.2.	Noise level  Usage of appropriate PPE	Noise measurement	Noise level at sensitive receptors not to exceed FME <sub>env</sub>	Weekly at Construction site and nearby	Environmental & Social Safeguard Officers	See I.A.2.

	gas cylinders, metal cutting discs		exceeding 80 decibels (dba) when measured at a distance of 10m or more from vehicles, plants and machinery. Train the operators on proper use and maintenance of tools, proper positioning of machinery on site Maintain noise levels below 80 dB					recommended level (90 dBA) for an 8 hour period	communities	Adamawa State Ministry of Environment (ASME)  Engineering Consultant	
16.	Water supply rehabilitation activities e.g. dismantling of existing water towers, stockpiling material etc	Visual intrusion  Dust	Ensure good housekeeping at the construction site. Ensure areas for dismantling of existing towers are properly cordoned off Remove all construction equipment from the site after completion of work. Consult with State PCU on the designated areas for stockpiling of pipes, metals, gravel, and other construction materials; Use tarpaulins to cover sand and other	Contractor	No additional cost	Document housekeeping procedures & plans for site	Visual observation	Quality Control/Quality Assurance Standards	Daily on Site	Environmental & Social Safeguard Officers,  Adamawa State Ministry of Environment (ASME)	

			loose material when transported by trucks; and Service all heavy equipment and machinery regularly Ensure site is properly wet prior to demolishing of walls to control the dust								
17.	Movement of plant & equipment to and from staging area to site	Soil contamination	Develop and implement a site-specific Waste Management Plan (WMP) Prepare and implement an Emergency Response Plan to respond to incident of spillage. Ensure fuel storage tanks are installed in a bonded area and checked daily. Ensure regular maintenance of vehicles to avoid leaks of oil. Prevent unregulated dumping of fuel waste Ensure local communities are sensitized on need to avoid tampering with	Contractor	250,000	Emergency Response Plan for spillage developed  Soil quality parameters	Visual observation  Laboratory testing	FMEnv Soil Quality Standards	Monthly at Project Site	Environmental & Social Safeguard Officers,  Adamawa State Ministry of Environment (ASME)  Adamawa State Environmental Protection Agency	75,000



			waste bins								
18.	Use of plant and equipment with internal combustion engines	Release of Green House Gas emissions (drivers of global warming)	Maintain equipment & machinery to manufacturers' specifications by regular servicing to reduce carbon emissions. Ensure that the mitigation measures in B3 are carried out. Train drivers/workers on proper operation of vehicles and equipment to include fuel efficiency and anti-idling. Ensure no burning of waste or any material on sites.	Contractor	100,000	Maintenance records  Training records  Evidence of waste burning	Visual Observation  Interview	FME <sub>env</sub> permissible limit for air emission	Weekly at Project Site	Adamawa State Ministry of Environment (ASME)  Adamawa State Ministry of Environment	25,000
19.	Use of workers camp/site office	Sanitation issues and public health impacts	Provide trash bins on site for temporary storage of domestic waste such as lubricant containers, drinking water sachets and carrier bags/packaging materials. Dispose all construction and domestic waste at the approved dumpsites	Contractor/ Engineering Consultant  Environmental Safeguards Specialist	237,500	Presence of functional sanitary facilities on site  Waste vendor licenses  Waste	Visual Observation  Interview	National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations 1991.	Weekly at Project Site	Adamawa State Ministry of Environment (ASME)  Adamawa State Environmental Protection Agency (ADSEPA)	40,000

			<p>and in the approved manner.                      Ensure all trenches or excavations made during the construction works do not collect stagnant water, which could breed mosquitoes.                      Ensure access to toilets for construction crew or provide temporary toilets (mobile toilets) for use where there are no existing ones.                      Ensure mobile toilets/sanitary provisions are provided to reflect gender types.                      Ensure regular toolbox meetings are held among contractor workers to offer awareness on transmission of contagious or communicable diseases.</p>			evacuation documentation					
20.	Use of tools (wrenches, hammers, saws etc.),	Occupational accidents and	Develop and implement a project specific Occupational Health and Safety	Contractor	225,000	OHSP developed  No of	Visual observation	Compliance with Factory Act, 1990	Monthly at Construction	Environmental & Social Safeguards Officer	45,000

<p>Operation of Machinery &amp; Equipment</p> <p>Pipelaying activities</p> <p>Movement of materials</p>	<p>injuries to workers and risk to community health and safety</p>	<p>Plan (OHSP). OHSP to include but not limited to:                  Prohibition of drug and alcohol use by workers while on the job.                  Provision of adequate first aid, first aiders, PPE, signage (English and Hausa languages).                  Use only trained personnel for welding &amp; metal bending activities                  Restriction of unauthorized access to all areas of high risk activities                  Provision of specific personnel training on worksite OHS management                  Ensure that staging areas for contractor equipment are adequately delineated and cordoned off with reflective tapes and barriers                  Any uncovered work pits should have appropriate signage and protection</p>			<p>trained first Aiders</p> <p>Usage of appropriate PPE</p> <p>Usage of signage and demarcations</p>		<p>Compliance with ISO 14001 Occupational Health &amp; Safety Standards</p>	<p>Site</p>		
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			<p>around them Workers should get a daily induction/toolbox before going on the site and a refresher of what happened on site a day before Adequate safety signage on construction sites should be installed to alert community/drivers/ pedestrians lighting and/or reflective tapes and signage integrated in all worksites for safety at night appropriate security measures in place to prevent harassment or kidnapping of workers Ensure demolition areas and areas for roof removals are properly cordoned off to prevent accidents and incidents</p>								
21.	Rehabilitation/ upgrade &	Generation of construction	Develop and implement a site-specific Waste	Contractor	200,000	Contractor's WMP	Visual Observation	National Environmental	Weekly at Project	Environmental & Social Safeguards	60,000

	Construction work activities	on waste including spoils, debris and concrete	Management Plan (WMP) to include the following: Ensure segregation of waste to facilitate reuse and recycling opportunities. Ensure no burning of waste on site. Ensure usage of ADAMAWA ASWAMA approved waste vendor for waste evacuation, processing & disposal.			Evidence of waste segregation  Waste storage facility  Waste vendor licenses and waste evacuation documentation	Interview	Protection (Management of Solid and Hazardous Wastes) Regulation 1991.	Site	Officer  ADAMAWA ASWAMA	
B. Social Issues											
22.	Water supply project upgrade/rehabilitation activities	Increase in spread of Communicable diseases, STDs such as HIV/AIDS and other STIs	Ensure access into construction site is restricted Free testing kits Provision of condoms Vaccinating workers against common and locally prevalent diseases; Monitoring of local population health data, in particular for transmissible diseases. Implementation of	Contractor/Engineering Consultant;  Adamawa State Ministry of Health	112,500	Evidence of inclusion in the bid advert and contractor  Records of training and awareness conducted and	Records inspection	Documentation	Check and evaluate during bid evaluation  Once	Social Safeguards Officer - PCU  Supervision consultant and GBV	60,000

			HIV/AIDS education program; Information campaigns on STDs among the workers and local community in collaboration WITH relevant HIV/AIDS management organizations in Adamawa State.			evidence of GBV track protocol prepared			annually	Specialist	
23.	Water supply project upgrade/rehabilitation, activities	Risk of GBV/SEA and VAC as a result of Labour Influx	Commitment / policy to cooperate with law enforcement agencies investigating perpetrators of gender-based violence; Provision of opportunities for workers to regularly return to their families; Provision of opportunities for workers to take advantage of entertainment opportunities away from rural host communities. Capacity building for local law enforcement and the	Contractor  Contractor	200,000	Evidence of inclusion in the bid advert and contract  Records of training and awareness conducted and	Records inspection	Documentation	Check and evaluate during bid evaluation  Once annually	Social Safeguards Officer - PCU  Supervision consultant and GBV Specialist	75,000

			<p>Adamawa State ministry of Women Affairs and child development to act on GBV complaints; Information and awareness raising campaigns for community members, specifically women and girls; Provision of information to the project corridor about the contractor's policies and Worker Code of Conduct (where applicable). Enforcement of laws on sexual violence and human trafficking. Include in the bid document and also in the contract the need for contractor to draft and sign the following:                  Company's code of conduct for prevention of GBV and VAC;                  Manager's code of conduct for</p>			evidence of GBV track proto-Copy prepared					
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			prevention of GBV and VAC Individual's code of conduct for prevention of GBV and VAC Community and workers' training and community sensitization on GBV/SEA/VAC; Developing a specific internal "Reporting and Response Protocol and GRM" to guide relevant stakeholders in case of GBV/SEA/VAC incidents,								
C. Operational Phase											
24.	Operation of workers camp/site office prior to demobilization of facilities	Generation of sanitary waste from worker's camp	Ensure provision of sanitary facilities on site for workers and enforce usage. Ensure usage of approved waste vendor for waste evacuation & disposal.	Contractor	150,000	Presence of functional sanitary facilities on site Waste vendor licenses and waste evacuation document	Visual Observation  Interview	National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations 1991.	Weekly at Project Site	Environmental & Social Safeguards Officer - PCU  Supervision consultant and GBV Specialist ADAMAWA	50,000



						ation				SWAMA	
25.	Commissioning of water supply infrastructure	Generation of construction waste and debris	Develop and implement a site-specific Waste Management Plan (WMP) to include the following: Ensure segregation of waste to facilitate reuse and recycling opportunities. Site visit at the completion of project to ensure no waste is left behind.	Contractor	Part of Maintenance cost	WMP for maintenance activities.  Waste vendor licenses  Waste documentation	Visual observation	Management of Solid and Hazardous Wastes Regulations of 1991.	Daily during maintenance works at project site	ASME  ADAMAWA ESWAMA	Part of operation cost
26	Operation of water supply infrastructure	Flooding from water tank collapse	*Ensure that metal frame/stanchions & reinforcements are of proper specifications to carry water storage tanks *Incorporate flood protection/resistant measures into design of plant buildings such as backflow/shut off valves for water pumps etc. *Ensure anchoring of structure to prevent failures	Contractor	Include in engineering design	Establishment of emergency response plan	Visual observation records	Checklist of flood protection measures	Daily during maintenance works at project site	Environmental & Social Safeguard Officers  Adamawa State Ministry of Environment (ASME)	Included

			<p>*Perform regular Integrity checks on framework</p> <p>* Prepare and have in place an emergency response plan for tank collapse emergencies (will contain contact details &amp; procedures, alarm to warn neighboring communities)</p> <p>*Identify a muster point at a high elevation for immediate evacuation of personnel during emergency</p> <p>*Encourage periodic emergency drills</p>								
Social Issues											
27.	Creation of dugout pits on site from excavation for tank stands	Public health concerns from formation of stagnant pools for mosquito larvae breeding	<p>*Ensure filling out of all dugout pits to prevent water stagnation.</p> <p>*Ensure current system can handle improved drainage (prevent runoff erosion/ reservoir overflow)</p> <p>*Develop and implement plan to deal with impacts</p>	Contractor	No additional costs	<p>Evidence of Occurrence</p> <p>Reported incidence of flooding/ reduced drainage capacity during construction</p>	Complaints received, resolution documented	PCU Safeguard Specialist	Quarterly	PCU Engineering Consultant	No additional cost
									At the beginning of the Maintenance -		

						Plan in place & Executed					
28.	Interactions between Contractors and community	Child labor and school drop out	Ensuring that children and minors are not employed directly or indirectly on the project by having in place an auditable & verifiable employment process mandating provision of identification to demonstrate date of birth (DoB) Enforcement of legislation on child labor Ensure periodic meetings with vulnerable groups to ensure not marginalized	Contractor	212,500	Recruitment Reports of contractor	Complaints	Child Rights Act 2003	Monthly	Adamawa Social Safeguards Officer	90,000
D. Decommissioning											
I. Environmental Issues											

29.	Demobilization of camp facilities, plant & equipment	Risks of occupational accidents and injuries to workers.	<p>Develop &amp; implement a project specific Occupational Health and Safety Plan (OHSP) to include but not limited to:</p> <ul style="list-style-type: none"> <li>Prohibition of drug and alcohol use by workers while on the job.</li> <li>Provision of adequate first aid, first aiders, PPE, signage (English and Hausa languages).</li> <li>Restriction of unauthorized access to all areas of high risk activities.</li> <li>Provision of specific personnel training on worksite OHS management</li> <li>Ensure that staging areas for contractor equipment are adequately delineated and cordoned off with reflective tapes and barriers</li> <li>Workers should get a daily induction/toolbox before going on the</li> </ul>	Contractor	Part of Maintenance cost	<p>OHSP developed</p> <p>No of trained first Aiders</p> <p>Usage of appropriate PPE</p> <p>Usage of signage and demarcations</p>	Visual observation	Compliance with Factory Act, 1990	Monthly at Construction Site	ASMWR	
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			<p>site and a refresher of what happened on site a day before</p> <p>Adequate safety signage on construction sites should be installed to alert community/drivers/ pedestrians lighting and/or reflective tapes and signage integrated in all worksites for safety at night</p> <p>*Ensure that appropriate security measures in place to prevent harassment or kidnapping of workers</p>								
30.	All decommissioning activities	Waste management	<p>* Re-vegetate areas around workers camp &amp; Maintenance equipment sites to restore the landscape.</p> <p>* Ensure that any remaining metal or pvc pipes, or other waste streams created during Maintenance activities and waste generated during decommissioning activities are collected</p>	Contractor	250,000	Availability and proper use of PPEs - Availability and proper use of warning signs	Transport for monitoring Records on frequency and location of waste disposal site of domestic and		Weekly	<p>Contractor/ Engineering Consultant</p> <p>PCU/Social Safeguards Specialist</p>	55,000

			from the project sites and properly disposed before handing over the project.				constructi on waste				
<b>Sub-Total Mitigation</b>				<b>5,650,000.00</b>	<b>Sub-Total Monitoring</b>						<b>1,227,500.00</b>

#### **4.2 Additional Mitigation for Gender Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA).**

The specific measures to reduce and mitigate the risk of GBV/SEA in the project.

Such measures will include:

- a) GBV/SEA assessment of project.
- b) Mandatory signing of Code of Conduct on sexual harassment by Contractor's and their employees
- c) Appointment of NGO to monitor GBV/SEA in all projects/subprojects implemented by Adamawa MCRP.
- d) Community and workers' sensitization on GBV/SEA.
- e) Provision of referral units for survivors of GBV/SEA.
- f) Provision in contracts for dedicated payments to contractors for GBV/SEA prevention activities.
- g) Contractor and SPCU requirement to ensure a minimum target of female employment with incremental rewards for the attainment of this target.

The following actions are recommended for immediate implementation:

- Hiring a dedicated GBV/SEA specialist for the project.
- Hiring NGOs at the state level to manage social risks associated with GBV/SEA in the project.
- Building and improving FPMU/SPCUs, local communities and other relevant stakeholders' capacities to address risks of GBV/SEA by developing and providing guidance, training, awareness and dissemination of relevant GBV/SEA materials to communities.
- Strengthening operational processes of Adamawa state MCRP on GBV/SEA.
- Identifying development partners and cultivating pragmatic partnership on GBV/SEA prevention measures and referral services.
- Developing Code of Conduct for civil works contractor with prohibition against GBV/SEA.
- Strengthening consultations and making operational GBV/SEA specific grievance redress mechanism.
- Providing financial support for implementation of the GBV/SEA actions described here-in including training and awareness building for various stakeholders.
- Establishing the inter-ministerial committee to advance GBV/SEA actions described above.

Overall, GBV risks in the project area might include Intimate Partner Violence (IPV), public harassment including harassment, verbal insults, physical abuse, rape, harmful widowhood practices and women and child trafficking. Targeted support to women under the program could likely exacerbate these risks. Development and implementation of specific GBV risk prevention and mitigation strategies tailored to local contexts will be critical. Guidelines for situation analysis of GBV and safe reporting guidelines in line with international best practices will be implemented. Further, all risks related to labour influx will have to be mitigated by participation of project beneficiaries/communities and involvement of project contractors and contractors' workers and consultant employees in identifying mitigation and implementing measures, including developing mitigation instruments such as 'Labour Influx Management Plan'(See Annex 15) or Camp Management Plan.

#### **4.3 Measures for Non-compliance to the ESMP**

If the Contractor was, or is, failing to perform any ESHS obligations or work under the Contract, the value of this work or obligation, as determined by the Project Manager, may be withheld until the work or obligation has been performed, and/or the cost of rectification or replacement, as determined by the Project Manager, may be withheld until rectification or replacement has been completed. In case of recurrence, the Resident Engineer(supervision) may decide other appropriate measure as contained in the contract including advising the client to call the Performance Security.

Failure to perform includes, but is not limited to the following:

- a) failure to comply with any ESHS obligations or work described in the Works' Requirements which may include: working outside site boundaries, excessive dust, failure to keep public roads in a safe usable condition, damage to offsite vegetation, pollution of water courses from oils or sedimentation, contamination of land e.g. from oils, human waste, damage to

- archeology or cultural heritage features, air pollution as a result of unauthorized and/or inefficient combustion;
- b) failure to regularly review C-ESMP and/or update it in a timely manner to address emerging ESHS issues, or anticipated risks or impacts;
  - c) failure to implement the C-ESMP e.g. failure to provide required training or sensitization;
  - d) failing to have appropriate consents/permits prior to undertaking Works or related activities;
  - e) failure to submit ESHS report/s (as described in Appendix C), or failure to submit such reports in a timely manner;
  - f) failure to implement remediation as instructed by the Engineer within the specified timeframe (e.g. remediation addressing non-compliance/s).
  - g) A written notification from the resident engineer 10 days after the agreed date for the submission of the monthly environmental reports if there is no written explanation submitted by the environmental officer of the contractor.
  - h) Failure to submit a declaration of methods for the operations that request it, the Resident Engineer shall immediately suspend activities that are occurring without this approved document.
  - i) The employer shall be financially penalized if his workers at the workplace do not have their personal protective equipment (gloves, jackets, boots, etc.).
  - j) The contractors be penalized by a written note if they do not comply with the methodology approved for the work. In case of recurrence, the Resident Engineer may decide other appropriate measure as contained in the contract including advising the client to call the Performance Security

### 4.3 Institutional Arrangements

The successful implementation of this ESMP depends on the commitment and capacity of various institutions and stakeholders to implement the ESMP effectively. Thus, the arrangement as well as the roles and responsibilities of the institutions and persons that will be involved in the implementation, monitoring and review of the ESMP are presented in Table 8 below.

Table 8: Institutional Arrangement for ESMP Implementation

S/ N	Category	Roles & Responsibilities
	Federal Ministry of Environment	Approve disclosure of ESIA/ESMP in country Environmental monitoring to ensure country standards is complied with
	Adamawa State Ministry of Environment	Environmental monitoring and compliance overseer at the State level Site assessment and monitoring of ESMP implementation.
	PCU	Ensuring approval of fund for Environmental and Social safeguards unit and M&E implementation and monitoring functions; Ensure that the ESIA/ESMP is disclosed to the public Responsible for coordination to ensure that parties to implementation carry out their responsibilities as and when due. Ensure that World Bank safeguards policies and country standards are adhered to by contractor and workers through supervision and funding of mitigation measures/ESMP
4	Environmental & Social Safeguard Units	Environmental Safeguards Officer Carry out supervision functions during construction to ensure that contractor and workers adhere to mitigation measures in the ESMP; Collate environmental baseline data on relevant environmental characteristics for monitoring and auditing Ensure that project activities are implemented in accordance with good practices and guidelines set out in the site specific ESMP; Identify and liaise with all stakeholders involved in environment related issues in



		<p>the project; and be responsible for the overall monitoring of mitigation measures and the impacts of the project during implementation.</p> <p>Social Safeguards          Coordinate and ensures the implementation of the social aspects of the ESMP          Identify and liaise with all stakeholders involved in social related issues in the project;          Conduct impact evaluation and beneficiary’s assessment; and          Establish partnerships &amp; liaise with organizations, Community Based Organizations (CBOs), Civil Society Organizations (CSOs).</p>
5	Contractor	<p>Compliance to BOQ specification in procurement of material and construction          Implement ESMP during project implementation          Develop C-ESMP          Ensuring staff good behavior/ practices including the use of PPEs and zero gender violence          Compliance to BOQ specification in procurement of material and construction          Hire Safeguards personnel implement ESMP during project implementation          Mitigate environmental and social Impacts          Implementation of code of conduct for all staff          Develop contractor ESMP (C-ESMP)          Preparation of work plans for environmental and social management in line with the ESMP          Ensure any changes during construction process that may have a significant environmental and social impact are communicated to ESO in time and managed accordingly.          Maintain records of environmental incidents as well as corrective and preventive actions taken          Supervision of implementation of all the measures and preparation of required Monitoring report          Contractor should ensure that the safety officer conducts a Job Hazard Analysis (JHA) prior to the commencement of work to identify the hazards associated with the job activities          Ensure all contractors and workers sign the Code of Conduct (CoC) and are routinely trained on the contents of the CoC          Provide adequate basic amenities and PPEs to workers, and ensure that the PPEs are worn by workers during work.          Prepare and maintain records and all required reporting data as stipulated by the ESMP, for submission to the Supervising Consultant</p>
6.	Supervising Consultant	<p>Supervise the implementation of the ESMP by the Contractors;          Review the Contractors Environmental and Social Implementation Plans (CESMP) to ensure compliance with the ESMP          Review site-specific environmental enhancement/mitigation designs worked out by the Contractor.          Develop of good practice construction guidelines to assist the contractors in implementing ESMPs.          Prepare and submit regular environmental monitoring and implementation progress reports.          Continuous interaction with the Engineer/ESSU regarding the implementation of the environmental/social provisions in the ESMP          Provides an independent oversight ensuring contractor adhere strictly to the engineering specifications and provide frequent reports on contractor/ Clients compliance          Preparation and implementation of the Environmental and Social Monitoring Plan during construction          Supervision of contractor performance of implementation of the Construction and Work Camp Management Plan          Hire Safeguards personnel implement ESMP</p>

		<p>Thorough supervision of the mitigation of the environmental and Social impacts such as labour influx and GBV</p> <p>Reporting any incidents or non-compliance with the ESMP to the PCU</p> <p>Ensuring adequate training and education of all staff involved in environmental supervision</p> <p>Making recommendations to the PCU regarding ESMP performance as part of an overall commitment to continuous improvement</p> <p>Supervise contractor performance of implementation of the Construction Campsite/Staging area Camp Management Plan/CESMP</p> <p>Prepare monthly safeguards report including recommendations to the PCU regarding ESMP performance as part of an overall commitment to continuous improvement</p>
7	Adamawa State Environmental Protection Agency	<p>Inspection of project premises in order to ensure strict compliance with sanitation and waste management standards in the state.</p> <p>Collaboration with other MDAs at the State and Federal level, NGOs and Donor Agencies in environmental protection and management especially in areas of waste recycling etc.</p>
8	Adamawa LGAs	<p>Provision of oversight function across project within its jurisdiction for ESMP compliance.</p> <p>Monitoring of activities related to public health, sanitation, waste management amongst others.</p>
9	Affected Community and Public	<p>Promote environmental awareness.</p> <p>Review environmental and social performance report made available by PCU.</p> <p>Provide comments, advice and/or complaints on issues of nonconformity.</p> <p>Attend public meetings organized by the PCU to disseminate information and receive feedback.</p> <p>Identify issues that could derail the project and support project mitigation measures and awareness campaigns.</p>
10	CDA	<p>Ensure community participation by mobilizing, sensitizing community members;</p>
11	NGOs/CSOs	<p>Assisting in their respective ways to ensure effective response actions, conducting scientific researches alongside government groups to evolve and devise sustainable environmental strategies and techniques.</p>
12	World Bank	<p>Overall supervision and provision of technical support and guidance.</p> <p>Disclosure of ESIA/ESMP at World Bank external site</p> <p>Oversight mission to monitor PCU’s implementation and performance of ESMP</p>

The Adamawa MCRP, and any institution participating in the implementation, will not issue a Request for Proposal (RFP) of any activity without the construction phase’s Environmental and Social Management Plan (ESMP) inserted in, and will not authorize the works to commence before the contractor’s ESMP (C-ESMP) has been approved and integrated into the overall planning of the works.

#### 4.4 Contractual Measures

Most of the mitigation measures are the obligation of the Contractor during the pre-construction and construction phases of the project. Consequently, the potential contractor will have to prepare their proposals taking into account the measures in table 9 as well as the detailed general environmental management conditions during civil works.

Table 9: Contractual Measures

Action	Remarks
The measures as described in this ESMP shall be included in the tender documents with appropriate flexibility to adjust these measures to site circumstances, and that the potential contractor will have to prepare their proposals taking into account these measures.	The non-inclusion of these measures in the proposal will lead to a disqualification of the proponent; The contract with the successful bidder should contain these environmental and social management measures as firm conditions to be complied with.

Specifically, the measures should be translated into a suite of environmental specification that are written in the same language style and format as the rest of the contract document	This approach will ensure that the environmental and social controls integrate seamlessly into the tender document and are presented in a familiar form to the Contractor
Cost of mitigation measures be added to the cost of the contractual document	The contractor must take into account and put the cost for the environmental and social requirements specified in the ESMP.

#### 4.5 Capacity Building for Implementation of ESMP and Permit Conditions

An initial assessment indicates that the capacity of the PCU for implementing this ESMP will require strengthening, especially in the area of implementing the World Bank’s environmental safeguards policies, and the application & management, therefore requiring strengthening in order to close these gaps.

Consequently, a training Workshop will be organized to guide the implementation of the ESMP and topical areas of discussion would include the Permit Schedule, World Bank’s Safeguards Policy triggered and environmental management. The training on the ESMP implementations will include the Code of conduct for contractor and his/her labour force, public health and safety issues, occupational health, Grievance Redress Mechanism for the project, ESMP monitoring and reporting. The capacity building will also involve sensitization of workers on issues such as child sexual exploitation, labour influx, Gender Based Violence, HIV/AIDS and their mitigation measures.

The capacity building plan proposed to achieve this is provided in table 10.

Table 10: Capacity building plan for implementation of the ESMP & permit conditions

Activity	Target Group/Participants	Timeline/ Duration	Proposed Facilitator	Cost NGN
*Training Workshop on preparation of ESMP, Permit Schedule  *World Bank Safeguards Policy triggered and environmental management.  *Water supply system upgrade/rehabilitation safeguard requirements	*Engineering Consultant -Resident Engineer, Clerk of Works  *Project Coordinator, Works Engineer, Planning Officer, Finance Officer Safeguard Officers	Prior to resumption/ commencement of construction works. (1/2 days)	Environmental Safeguards Specialist/ Consultant	250,000
*Sensitization of workers on child sexual exploitation and HIV/AIDS, labour influx, Gender Based Violence, and their mitigation measures.	*Contractor, contractor workers, Manager, Foreman, Engineers	Prior to resumption/ commencement of construction works. (1/2 days)	Social Safeguards Specialist/ Consultant	150,000
*Induction on occupational and public health and safety (OHS) requirements of the works and environmental management  *Training on Contractor’s, manager’s and Worker’s Code of Conduct understanding	All construction/ contractor workers	Prior to commencement of construction works. (1/2 day)	Lead Contractor/ Engineering Consultant/ HSE-OHS Consultant	200,000
*Risk assessment on construction work projects *Conducting Health and Safety Assessments	All construction/ contractor workers	Prior to commencement of construction		250,000

Activity	Target Group/Participants	Timeline/Duration	Proposed Facilitator	Cost NGN
*Developing and implementing mitigation measures		works. (1/2 day)		
<b>Total</b>				<b>₦850,000.00</b>

Table 11: Description of cost breakdown

Description	Cost (NGN)
Professional fee for 2 Consultants for 2 days	400,000.00
Rent/Hiring of facility (for 2 day training)	100,000.00
Feeding of participants - tea break	50,000.00
Feeding of participants (2 days)	100,000.00
Workshop Materials	100,000.00
<b>Total</b>	<b>₦850,000.00</b>

#### 4.6 Implementation Schedule

The activities related to environmental management and monitoring must be integrated in the overall construction schedule. The project implementation phase is estimated for 6 months for rehabilitation activities and 12 months for upgrade activities. The implementation schedule is presented in table 12 below.

Table 12: Implementation Schedule

S / N	Activity Description	Responsible	Preconstruction (Month)		Construction (Month)												Operation Phase	
			Upgrade of Small Town Water Supply Systems															
			Rehabilitation															
			1	2	3	4	5	6	12									
	Clearance and Formal Disclosure of ESMP	PCU	█															
	Inclusion of E&S Requirements in bid documents	PCU	█															
	Allocating Budget for ESMP	PCU	█															
	Appointing Support Staff for ESMP	PCU		█														
	Review & Approval of Contractor's E&S Plans	PCU		█														
	Finalization of Engineering Designs	PCU/ Consultant	█															
	Mobilization to site	Contractor			█													
	Site Clearing	Contractor			█													
	Construction Phase	Contractor			█													
	Implementation of Mitigation	PCU/ Contractor			█												█	
	Supervising ESMP Implementation	PCU			█												█	
	Monitoring & Reporting on ESMP Implementation	PCU/MDAs			█													
	Environmental and Social Training	E&S Consultant	█															
	Environmental and Social Auditing	PCU/SME /Consultant														█		

#### 4.7 Estimated Budget for ESMP Implementation

The environmental and social management actions is estimated at Ten Million, One Hundred and Fifty Thousand, Two Hundred and Fifty Naira Only (₦10,150,250.00), and a Dollar equivalent of Thirty Three Thousand, One Hundred and Seventy Dollars Only (\$33,170.00). This is as shown in Table 13.

Table 13: ESMP Budget

#	Item	Cost Estimate	
		Naira (₦)	USD (\$)¹¹
1	Mitigation	5,650,000.00	18,464.00
2	Monitoring	1,227,500.00	4,011.00
3	Capacity Building (including training on Code-of-conduct)	850,000.00	2,777.00
4	GBV, STIs and HIV Mitigation	750,000.00	2,450.00
5	Grievance Redress Mechanism	750,000.00	2,450.00
	<b>Sub-Total</b>	<b>9,227,500.00</b>	<b>30,155.00</b>
6	Contingency (10% of sub Total)	922,750.00	3,015.00
	<b>Grand Total</b>	<b>10,150,250.00</b>	<b>33,170.00</b>

#### 4.8 ESMP Disclosures

After the ESMP review and clearance by the World Bank, the information in Table 14 describes the process of disclosure.

Table 14: Breakdown of Disclosure process

s/n	Action	Remarks
1	Disclosure on 2 state newspapers	The PCU will disclose the ESIA/ESMP as required by the Nigeria EIA public notice and review procedures
2	Disclosure on 2 national newspapers	The PCU will disclose the ESIA/ESMP as required by the Nigeria EIA public notice and review procedures
3	Disclosure at the Adamawa State Ministry of Environment	The PCU will disclose the ESIA/ESMP as required by the Nigeria EIA public notice and review procedures
4	Disclosure at the Adamawa Ministry of Works & Transport office	The PCU will disclose the ESIA/ESMP as required by the Nigeria EIA public notice and review procedures
5	Disclosure at Adamawa LGAs (Michika LGA)	The purpose will be to inform stakeholders about the project activities; E&S impacts anticipated and proposed E&S mitigation measures.
6	Disclosure at the World Bank Info Shop	The ESMP will be disclosed according to the World Bank Operational Policy on Disclosure

¹¹ \$1=₦306

## **CHAPTER FIVE: GRIEVANCE REDRESS MECHANISM<sup>12</sup>**

### **5.1 Introduction**

Grievance redressed mechanism is an important aspect in projects and the redress of grievance is important to avoid unnecessary legal delays and cost overrun of the project and to ensure social accountability, inclusion, sustainability and transparency in the implementation activities, the Adamawa State MCRP shall establish a mechanism to receive and act on complaints and grievances from beneficiaries, stakeholders or project affected persons related to activities being conducted by the Project, in the State.

Grievance mechanisms are increasingly important for development projects where ongoing risks or adverse impacts are anticipated. For the proposed subprojects, grievances are likely to arise due to the following:

- i) Delay in civil works;
- ii) Conflict between construction workers and community members;
- iii) Unmanaged expectations;
- iv) Lack of information about the project

To manage these social risks and others, which cannot be foreseen now with a view to ensuring successful project development and implementation, experience has revealed that open dialogue and collaborative grievance resolution represent the best practice. The grievance mechanisms shall at a minimum be targeted at the following:

- i) Provide a way to reduce risk for projects,
- ii) Provide an effective avenue for expressing concerns and achieving remedies for communities;
- iii) Promote a mutually constructive relationship;
- iv) Prevent and address community concerns, and
- v) Assist larger processes that create positive social change.

### **5.2 Grievance Redress Committee**

A Grievance Redress Committee shall be constituted within the PCU to receive, and ensure satisfactory resolution of grievances. The main functions of the Committee are spelt out below:

- Receive grievances from member of the public;
- Evaluate grievances from affected persons concerning the application to them of the Entitlement Policy;
- Recommend to the Social Officer, PCU as the case may be, solutions to such grievances from affected persons;
- Communicate the decisions to the Claimants;
- Hear appeals from persons, households or groups who, not being affected persons, believe that they are qualified to be recognized as affected persons, to recommend to the PCU whether such persons should be recognized as affected persons, and to communicate the decision of the PCU in that regard to the Claimants;
- Ensure that all notices, forms, and other documentation required by aggrieved persons are made available in Local language understood by people
- Made provision for complainants to submit claims without fear of retribution.

### **5.3 Grievance Redress Process**

At the time that the sub projects implementation are approved and contracts are signed, communities will have been informed of the process for expressing dissatisfaction and to seek redress. The grievance

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<sup>12</sup> A GRM has been developed for the entire MCRP, however this GRM will be for the implementation of the water supply rehabilitation, construction and upgrade sub-project in Adamawa state and will take bearing from the MCRP GRM.

procedure will be simple and administered as far as possible at the local levels to facilitate access, flexibility and ensure transparency. All the grievances will be channeled via the Grievance redress committee for each sub project at the sector level.

There is no ideal model or one-size-fits-all approach to grievance resolution. The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs and project conditions and scale. In its simplest form, grievance mechanisms can be broken down into the following primary components:

- (i) Receive and register a complaint
- (ii) Screen and assess the complaint
- (iii) Formulate a response (within a specified time frame)
- (iv) Select a resolution approach
- (v) Implement the approach
- (vi) Settle the issues
- (vii) Track and evaluate results
- (viii) Appeals process
- (ix) Monitoring and reporting to project management to detect systemic problems;
- (x) Learn from the experience and communicate back to all parties involved.

#### **5.4 Expectation when Grievances arise**

When local people present a grievance, they generally expect to receive one or more of the following: acknowledgement of their problem, an honest response to questions/issues brought forward, an apology, adequate resolution, modification of the conduct that caused the grievance and some other fair remedies.

In voicing their concerns, they also expect to be heard and taken seriously. Therefore, the company, contractors, or government officials must convince people that they can voice grievances and work to resolve them without retribution. To address these challenges, companies are being called upon to lead and work with their host communities to fund non-judicial, dialogue-based approaches for preventing and addressing community grievances. The overall process of grievance shall take the following way:

- During the initial stages of the valuation process, the affected persons are given copies of grievance procedures as a guide on how to handle the grievances;
- The process of grievance redress will start with registration of the grievances to be addressed for reference, and to enable progress updates of the cases.
- The response time will depend on the issue to be addressed but it should be addressed with efficiency. Nevertheless, Grievance form will be filled by person affected by the project with the Grievance Redress Committee, which will act on it within 10 working days on receipt. If no understanding or amicable solution is reached, or the affected person does not receive a response from the local Grievance Redress Committee within 15 working days, the affected person can appeal to a designated office in the PCU, which should act on the complaint/grievance within 15 working days of its filing.
- All reasonable moves shall be made to settle any arising grievance amicably. If affected person is not satisfied with the decision received, he/she can, as a last resort, appeal to a court of competent jurisdiction. Affected persons will be exempted from all administrative and legal fees incurred pursuant to grievance redress procedures.
- The appeals process will use a local mechanism, which includes peers and local leaders of the affected people. These will ensure equity across cases; they eliminate nuisance claims and satisfy legitimate claimants at low cost.

For MCRP, it is recognized that the formal legal mechanisms for grievance redress tend to be a lengthy and acrimonious procedures, thus an informal grievance redress mechanism through the PCU Safeguard Units will be established. This unit will work with a committee comprising administrative head of local governments; community/village chiefs, NGOs/CBOs and other relevant Government organs that will be set-up to address complaints.



The grievance redress mechanism is designed with the objective of solving disputes at the earliest possible time, which will be in the interest of all parties concerned and therefore implicitly discourages referring such matters to the law courts for resolution that will otherwise take a considerably longer time. For this reason, handling grievances will begin with the State Project Management Unit and involve Local Government. A grievance log will be established by the project and copies of the records kept with all the relevant authorities. A review of grievances will be conducted at least every three months during implementation in order to detect and correct systemic problems.

The PCU will establish an informal forum for the presentation and consideration of individual appeals after the administrative route has been exhausted. The informal forum will include local government, and other concerned responsible parties, as deemed appropriate them. The existence, location, purpose and composition of this forum will be publicized, so that displaced persons are knowledgeable about the availability of this forum for resolving any grievance. If a grievance cannot be resolved in these informal venues, the complainant may take recourse to the administrative and legal systems for satisfaction. Flow chart is shown in Figure 7.

### 5.5 Grievance Log

The Adamawa MCRP Social Safeguards officer will ensure that each complaint has an individual reference number, and is appropriately tracked and recorded actions are completed. The log also contains a record of the person responsible for an individual complaint, and records dates for the following events:

- Date the complaint was reported.
- Date the Grievance Log was uploaded onto the project database.
- Date the information on proposed corrective action sent to complainant.
- The date the complaint was closed out.
- Date response was sent to complainant.
- Monitoring Complaints

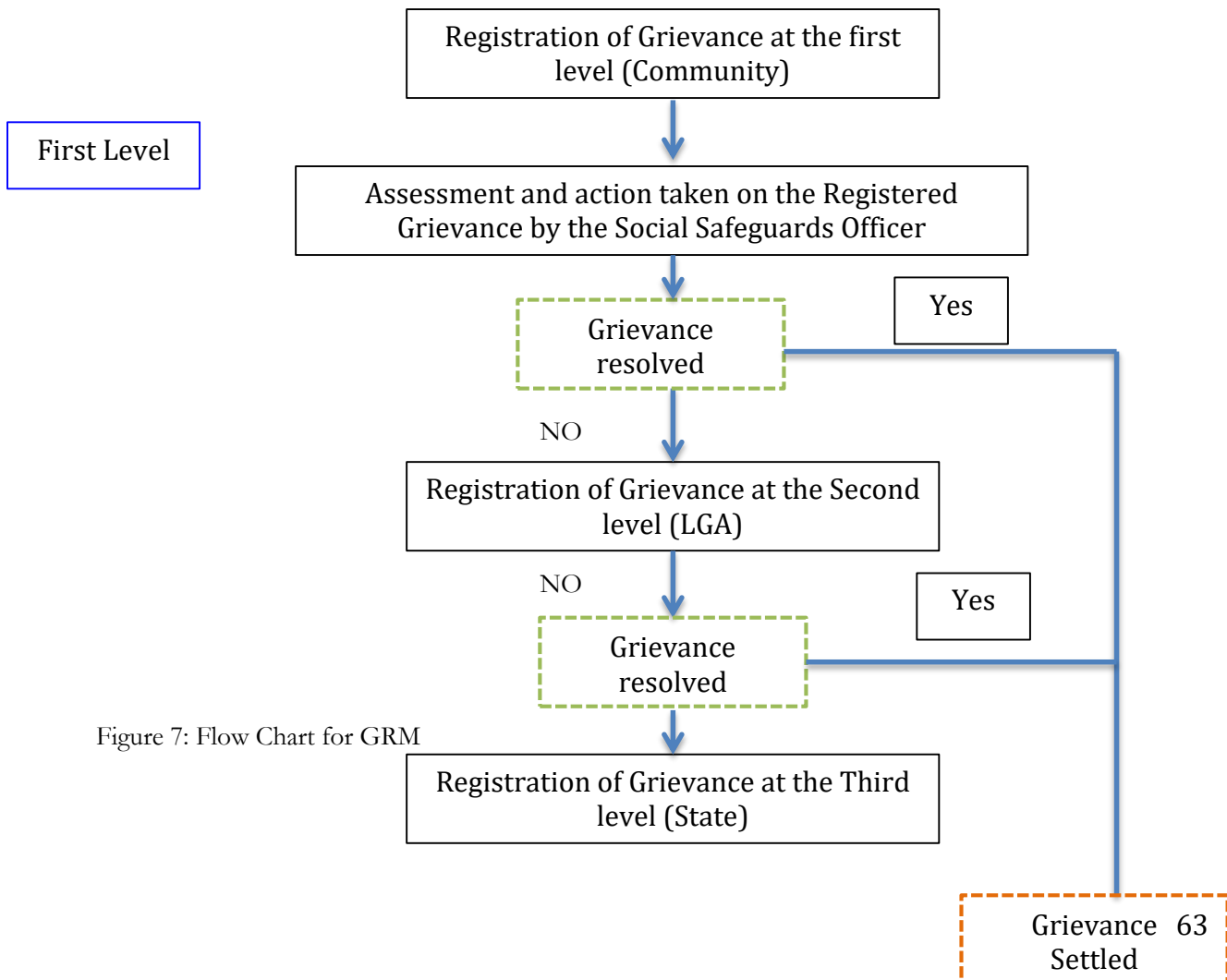


Figure 7: Flow Chart for GRM

**5.6 Financing the Grievance Redress Mechanism and Cost of Remediation**

SPIU shall be responsible for the funding of logistics for the GRC as well as the eventual compensation or remediation that aggrieved party may be entitled to. The SPIU will also be responsible for the cost of the judicial process for cases that result to court for adjudication.

## **CHAPTER SIX: STAKEHOLDER CONSULTATIONS**

### **6.1 Introduction**

Stakeholder participation during project planning, design and implementation is widely recognized as an integral part of environmental and social management for projects. It is a two-way flow of information and dialogue between project proponents and stakeholders, which are specifically aimed at developing ideas that can help shape project design, resolve conflicts at an early stage, assist in implementing solutions and monitor ongoing activities.

### **6.2 Objectives of Consultation**

The main objective of the consultations with stakeholders is to discuss the proposed project's environmental and social implications and to identify alternatives for consideration. Specifically, the consultations seek to achieve the following objectives:

- To provide some information about the proposed project;
- To provide opportunities for stakeholders to discuss their concerns and offer recommendations;
- To gain insight on the role of each stakeholder in the implementation of the environmental and social safeguards as well as structures in place for the management of the proposed facilities;
- To provide and discuss with stakeholders the alternatives considered to reduce anticipated impacts;
- To identify and verify significance of environmental, social and health impacts; and
- To inform the process of developing appropriate mitigation and management options.

### **6.3 Stakeholder Consultation Strategy and Plan**

Stakeholder consultation is a process and would continue through the ESMP study stages to its implementation. Table 15 summarizes the proposed approach for stakeholder engagement.

**Table 15: Stakeholders Engagement Strategy**

No.	Activity	Identified Stakeholders	Focus of Consultation/Engagement	Timelines/Frequency	Forms of communication	Facilitator
	Preparation of ESMP	FPMU State Project Coordinating Unit Federal Ministry of Environment State Ministry of Environment Community and Community Based Organizations FMF World Bank	Large scale forum Key stakeholders interviews Mapping of community interests and concerns Communities need to know what the project is all about.	Throughout the ESMP study period	Focus Group Discussion/workshops Phone calls One on one interview Distribution of pamphlets Public meetings Newspapers/magazines	Adamawa MCRP
	Site preparation prior to water supply upgrade/rehabilitation	PCU Contractor Supervising Engineers Consultant FME	Information Disclosure at Federal Ministry of Environment, State Ministry of Environment and Local Government level.	Two weeks prior to construction	Through Radio and Newspapers	Adamawa MCRP Federal Ministry of Environment
	Start of water supply upgrade/rehabilitation	PCU Contractors Supervising Engineers Consultant Suppliers Businessmen NGOs/vulnerable groups Communities	Affected Communities Government Officials World Bank	Throughout the construction period	Phone calls Newspapers Radios Pamphlets One on One	Adamawa MCRP FMF WORLD BANK
	End of water supply rehabilitation Decommissioning of construction equipment & machinery	PCU Government Officials Affected Communities World Bank	Government Officials Affected Communities	Decommissioning phase	Phone calls Televisions Radios Newspapers Emails Pamphlets	Government Officials Adamawa MCRP
	Commissioning and handing over of water supply infrastructure	Government Officials PCU Beneficiary Communities	Government Officials Benefitting Communities	Prior to operation of the facility	Newspapers Television Radio	Adamawa MCRP

No.	Activity	Identified Stakeholders	Focus of Consultation/ Engagement	Timelines/ Frequency	Forms of communication	Facilitator
	Operation and maintenance of water supply infrastructure	Beneficiary Communities	Beneficiary Communities	During operation and maintenance period	One on one Workshops/FGD Television Radio	Adamawa MCRP
		Adamawa MCRP	Beneficiary Communities	3 times a week	Visits	Adamawa MCRP
		Adamawa MCRP Government Officials	Beneficiary Communities	Fortnightly	Visits	
		Other Communities	Beneficiary Communities	3 times a week	Visits	
		NGOs/CBOs	Beneficiary Communities	3 times a week	Visits	
		World Bank	Beneficiary communities	Once a term	Once a term	Visits

#### 6.4 Stakeholders Consulted

Key stakeholders to the MCRP intervention sub-project were identified for consultations and these included stakeholders from the Adamawa Project Implementation Unit of the Federal Ministry of Environment (FMEEnv), Adamawa State Ministry of Environment, Adamawa State Ministry of Works & Infrastructure, Adamawa State Waste Management Agency (ASWAMA), village heads, local community leaders and women groups in communities. The vulnerable groups in the project areas were identified and these include:

- Children
- Old men and women
- Physically challenged individuals

#### 6.5 Outcome of Stakeholder Consultations carried out during ESMP Preparation

Site visits were carried out to undertake physical assessment of the different small town water supply sites from September 9 – 14th 2019 and meetings were held with other stakeholders such as consultations with different sector ministries such as the Ministries of Works, Water Resources, Transportation and the Federal Ministry of Environment, Adamawa State Ministry of Environment, Adamawa State Waste Management Agency and other relevant stakeholders in the project area. Pictures of consultation meetings are shown in Figure 8.

Table 16: Concerns raised and how they were addressed

Clarifications, Questions and concerns	How they were addressed
<p>At the different locations, the stakeholders and other community representatives all expressed appreciation for the project and sought clarification on the following:</p> <ul style="list-style-type: none"> <li>d) Due to the importance of the rehabilitation proposed the leadership in the community wanted to know when the project will kick off</li> <li>e) The women groups &amp; youths wished to know if there is a possibility of the engagement of the women &amp; youth in project activities for employment.</li> <li>f) The women want their husbands to be considered for job opportunities when project commences.</li> </ul>	<p>The issues were addressed by:</p> <ul style="list-style-type: none"> <li>a. The project would begin very soon and the ESMP is to ensure that adequate planning can be put in place before the project commences.</li> <li>b. Consideration will be given to women &amp; youths in the communities, especially for unskilled employment opportunities.</li> <li>c) The project will consider the husbands (who are also the men from the community), for job opportunities. This will be included in the ESMP for contractors.</li> </ul>

			
Uba & Pela Consultations			
			
Uba & Garkida Consultations			
			
Maiha Consultations			
			
Consultations with Michika NURTW Chairman	Consultation at one of 16 Michika Wards	Michika Caretaker Chairman	Committee
Michika Consultations			

Figure 8: Stakeholders Engagement

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**Annex 1: Questionnaire**

**MULTI-SECTORAL CRISIS RECOVERY PROJECT (MCRP)**

Questionnaire for the Preparation of Safeguard Instruments (ESIA & ESMP) for Adamawa - MCRP

This questionnaire which is expected to take about 20 minutes to complete is aimed at eliciting your view/opinion on the social and environmental implications of the Adamawa MCRP project activities in your community. Your input would assist in the preparation of an Environmental and Social Management Plan (ESMP) that would enable the PCU to manage the various project activities in a manner that guarantees socio-environmental sustainability of the project.

My \_\_\_\_\_ name \_\_\_\_\_ is  
.....  
.....  
.....

DATE:..... Questionnaire No.....

Community:.....

LGA:.....GPS

Location:.....

Please simply tick (x) or write in brief detail where appropriate

**SECTION A: BIO-DATA**

Name:

.....

PhoneNumber:.....

.....

Address(optional):

.....

Age (years): <18  18-30  30-50  50  above 70

Sex: Male  Female

What is your religion: Christian  Muslim  Pagan  traditionalist  Others

Marital Status: Single  Married  Separated/Divorced

No. of children: Non 1-3 4-6 6-8 Above 8  
Level of education: ( ) No formal educ. ( ) Govt. Secondary ( ) Secondary ( ) Tertiary ( )  
others (specify) .....

What do you do for a living (your Govt. secondary occupation/nature of business)?

( ) Self-employed ( ) fisherman ( ) hunter ( ) public sector ( ) Others  
(specify).....

11. How long have you been resident in this community?

( ) Since birth ( ) above 15 years ( ) 10 – 15 years ( ) 5 – 10 years ( ) below 5 years

12. What are the transportation means to this community?

( ) Car/bus ( ) motorcycle ( ) bicycle ( ) lorry ( ) others

13. Please give your weekly( ) or monthly ( ) earnings

Below N500 ( ) N500 – N1000 ( ) N1000 – N5000 ( ) N5000 – N7000 ( ) N7000 – N10,000  
above 10,000 ( )

SECTION B

11. What is your general opinion of this project?

.....

12. How do you think the project will affect the community? How will it affect the individual families?

.....

Pls explain the benefits or negative impacts of this project in the community?

.....

How do you seek redress when there is a grievance among people in this community?

.....

Do you have any concerns about labour influx into the community when the project commences?

.....

.....

How far or how close is the nearest market?

.....

.....

Please describe the leadership structure in this community

.....

.....

Please describe the health care facilities in this village. Where is the nearest hospital located?

.....

.....

19. Have you had any instances of gender based violence in your community? If yes, please

explain.....

.....

**Annex 2: Occupational Health & Safety (OHS) Plan**

No	Project Activity	Potential Impact	Proposed Measures/ Actions	Mitigation	Responsibility for mitigation	Cost (NGN)
I. Pre-Construction Phase						
1.	Mobilization of construction equipment, machinery, heavy duty vehicles and violation of workers' camp for Upgrade/rehabilitation of water supply systems	Deterioration of local air quality due to the emission of dusts & gases	Maintain equipment & machinery to manufacturers' specifications by regular servicing to reduce carbon emissions. Use water to wet active areas for dust suppression. Conduct regular visual inspection of dust pollution and ensure appropriate intervention if dust levels are high. Train drivers/ workers on proper operation of vehicles and equipment to include fuel efficiency and anti-idling. Ensure no burning of waste on sites Use of tarpaulins to cover trucks transporting earth materials or spoils Ensure rehabilitation of disturbed areas once completed Provide and enforce the usage of appropriate PPE		Contractor	350,000
3.	Site clearing for staging area  Mobilization of Machinery, Plant & Equipment  Use of tools – pipe wrenches, pipe saws, nails, blades etc.  Welding of pipes & metal	Occupational accidents and injuries to workers and risk to community health and safety	Develop and implement a project specific Occupational Health and Safety Plan (OHSP). OHSP to include but not limited to: Cordon off project site to prevent intrusions from general public Prohibition of drug and alcohol use by workers while on the job. Provision of adequate first aid, first aiders, PPE, signage (English and Hausa languages). Restriction of unauthorized access to all areas of high risk activities Provision of specific personnel training on worksite OHS management Prepare Instructions manual for Welding works Provide welding goggles & gloves as minimum PPE for welding works Ensure that staging areas for contractor equipment are adequately delineated and cordoned off with reflective tapes and barriers		Contractor	312,500

			<p>Any uncovered work pits should have appropriate signage and protection around them</p> <p>Workers should get a daily induction/toolbox before going on the site and a refresher of what happened on site a day before</p> <p>Adequate safety signage on construction sites should be installed to alert community/drivers/pedestrians lighting and/or reflective tapes and signage integrated in all worksites for safety at night</p> <p>appropriate security measures in place to prevent harassment or kidnapping of workers</p>		
20.	<p>Use of tools (wrenches, hammers, saws etc.), Operation of Machinery &amp; Equipment</p> <p>Pipelaying activities</p> <p>Movement of materials</p>	Occupational accidents and injuries to workers and risk to community health and safety	<p>Develop and implement a project specific Occupational Health and Safety Plan (OHSP). OHSP to include but not limited to:</p> <p>Prohibition of drug and alcohol use by workers while on the job.</p> <p>Provision of adequate first aid, first aiders, PPE, signage (English and Hausa languages).</p> <p>Use only trained personnel for welding &amp; metal bending activities</p> <p>Restriction of unauthorized access to all areas of high risk activities</p> <p>Provision of specific personnel training on worksite OHS management</p> <p>Ensure that staging areas for contractor equipment are adequately delineated and cordoned off with reflective tapes and barriers</p> <p>Any uncovered work pits should have appropriate signage and protection around them</p> <p>Workers should get a daily induction/toolbox before going on the site and a refresher of what happened on site a day before</p> <p>Adequate safety signage on construction sites should be installed to alert community/drivers/pedestrians lighting and/or reflective tapes and signage integrated in all</p>	Contractor	225,000

			worksites for safety at night appropriate security measures in place to prevent harassment or kidnapping of workers Ensure demolition areas and areas for roof removals are properly cordoned off to prevent accidents and incidents		
22.	Water supply project upgrade/rehabilitation activities	Increase in spread of Communicable diseases, STDs such as HIV/AIDS and other STIs	Ensure access into construction site is restricted Free testing kits Provision of condoms Vaccinating workers against common and locally prevalent diseases; Monitoring of local population health data, in particular for transmissible diseases. Implementation of HIV/AIDS education program; Information campaigns on STDs among the workers and local community in collaboration WITH relevant HIV/AIDS management organizations in Adamawa State.	Contractor/ Engineering Consultant;  Adamawa State Ministry of Health	112,500
28.	Demobilization of camp facilities, plant & equipment	Risks of occupational accidents and injuries to workers.	Develop & implement a project specific Occupational Health and Safety Plan (OHSP) to include but not limited to: Prohibition of drug and alcohol use by workers while on the job. Provision of adequate first aid, first aiders, PPE, signage (English and Hausa languages). Restriction of unauthorized access to all areas of high risk activities. Provision of specific personnel training on worksite OHS management Ensure that staging areas for contractor equipment are adequately delineated and cordoned off with reflective tapes and barriers Workers should get a daily induction/toolbox before going on the site and a refresher of what happened on site a day before Adequate safety signage on construction sites should be installed to alert community/drivers/pedestrians lighting and/or reflective tapes and signage integrated in all	Contractor	Part of Maintenance cost

			worksites for safety at night *Ensure that appropriate security measures in place to prevent harassment or kidnapping of workers		
29.	All decommissioning activities	Waste management	* Re-vegetate areas around workers camp & Maintenance equipment sites to restore the landscape. * Ensure that any remaining metal or pvc pipes, or other waste streams created during Maintenance activities and waste generated during decommissioning activities are collected from the project sites and properly disposed before handing over the project.	Contractor	250,000
<b>Sub-Total Mitigation</b>					<b>1,250,000</b>

## Annex 3: Sample Company Code of Conduct

### Company's Code of Conduct

#### Preventing Gender Based Violence and Violence Against Children

The company is committed to creating and maintaining an environment in which gender based violence (GBV) and violence against children (VAC) have no place, and where they will not be tolerated by any employee, associate, or representative of the company. Therefore, in order to ensure that all those engaged in the project are aware of this commitment, and in order to prevent, be aware of, and respond to any allegations of GBV and VAC, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives including sub-contractors, without exception:

The company—and therefore all employees, associates, and representatives—commit to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV and VAC are in violation of this commitment.

Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and its representatives.

Acts of GBV or VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment. All forms of GBV and VAC, including grooming are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or at worker's homes.

In addition to company sanctions, legal prosecution of those who commit acts of GBV or VAC will be pursued if appropriate.

Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

Sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior are prohibited.

Unless there is full consent<sup>13</sup> by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the work place are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.

All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and/or VAC by a fellow worker, whether in the same company or not. Reports must be made in accordance with GBV and VAC Allegation Procedures.

Managers are required to report suspected or actual acts of GBV and/or VAC as they have a responsibility to uphold company commitments and hold their direct reports responsible.

To ensure that the above principles are implemented effectively the company commits to ensuring that: All managers sign the ‘Manager's Code of Conduct’ detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the ‘Individual Code of Conduct’.

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<sup>13</sup> Consent is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.



All employees sign the project's 'Individual Code of Conduct' confirming their agreement not to engage in activities resulting in GBV or VAC.

Displaying the Company and Individual Codes of Conduct prominently and in clear view at workers' camps, offices, and in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.

Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.

An appropriate person is nominated as the company's 'Focal Point' for addressing GBV and VAC issues, including representing the company on the GBV and VAC Compliance Team (GCCT) which is comprised of representatives from the client, contractor(s), the supervision consultant, and local service provider(s).

Ensuring that an effective Action Plan is developed in consultation with the GCCT which includes as a minimum:

GBV and VAC Allegation Procedure to report GBV and VAC issues through the project Grievance Redress Mechanism (GRM);

Accountability Measures to protect confidentiality of all involved; and,

Response Protocol applicable to GBV and VAC survivors and perpetrators.

That the company effectively implements the Action Plan, providing feedback to the GCCT for improvements and updates as appropriate.

All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments and the project's GBV and VAC Codes of Conduct.

All employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's GBV and VAC Code of Conduct.

I do hereby acknowledge that I have read the foregoing Company Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Company Code of Conduct or failure to take action mandated by this Company Code of Conduct may result in disciplinary action.

Company name: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## Manager's Code of Conduct

### Preventing Gender Based Violence and Violence Against Children

Managers at all levels have particular responsibilities to uphold the company's commitment to preventing and addressing GBV and VAC. This means that managers have an acute responsibility to create and maintain an environment that prevents GBV and VAC. Managers need to support and promote the implementation of the Company Code of Conduct. To that end, managers must adhere this Manager's Code of Conduct and also sign the Individual Code of Conduct. This commits them to supporting and developing systems that facilitate the implementation of the Action Plan and maintain a GBV-free and VAC-free environment at the workplace and in the local community. These responsibilities include but are not limited to:

#### Implementation

To ensure maximum effectiveness of the Company and Individual Codes of Conduct:

Prominently displaying the Company and Individual Codes of Conduct in clear view at workers' camps, offices, and in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.

Ensuring all posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.

Verbally and in writing explain the Company and Individual Codes of Conduct to all staff.

Ensure that:

All direct reports sign the 'Individual Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.

Staff lists and signed copies of the Individual Code of Conduct are provided to the GCCT and the client.

Participate in training and ensure that staff also participate as outlined below.

Staff are familiar with the Grievance Redress Mechanism (GRM) and that they can use it to anonymously report concerns of GBV or VAC incidents.

Staff are encouraged to report suspected or actual GBV or VAC through the GRM by raising awareness about GBV and VAC issues, emphasizing the staff's responsibility to the Company and the country hosting their employment, and emphasizing the respect for confidentiality.

In compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees.

Ensure that when engaging in partnership, sub-contractor or similar agreements, these agreements:

Incorporate the GBV and VAC Codes of Conduct as an attachment.

Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.

expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against GBV and VAC, to investigate allegations thereof, or to take corrective actions when GBV or VAC has occurred, shall constitute grounds for sanctions and penalties in accordance with the Individual Codes of Conduct.

Provide support and resources to the GCCT to create and disseminate internal sensitization initiatives through the awareness-raising strategy under the Action Plan.

Ensure that any GBV or VAC issue warranting police action is reported to the client and the World Bank immediately.

#### Training

All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV and VAC

Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the Action Plan for addressing GBV and VAC issues.

Ensure that time is provided during work hours and that staff attend the mandatory project facilitated induction training on GBV and VAC required of all employees prior to commencing work on site.

Ensure that staff attend the monthly mandatory refresher training course required of all employees to combat increased risk of GBV and VAC during civil works.

Managers are required to attend and assist with the project facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations.

Collect satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.

#### Response

Managers will be required to provide input to the GBV and VAC Allegation Procedures and Response Protocol developed by the GCCT as part of the final cleared Action Plan.

Once adopted by the Company, managers will uphold the Accountability Measures set forth in the Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV and VAC (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).

If a manager develops concerns or suspicions regarding any form of GBV or VAC by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GRM.

Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made.

Managers failing to report or comply with such provision can in turn be subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:

Informal warning.

Formal warning.

Additional Training.

Loss of up to one week's salary.

Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.

Termination of employment.

Ultimately, failure to effectively respond to GBV and VAC cases on the work site by the company's managers or CEO may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the foregoing Manager's Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Manager's Code of Conduct or failure to take action mandated by this Manager's Code of Conduct may result in disciplinary action.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

### **Individual Code of Conduct**

Preventing Gender Based Violence and Violence Against Children

I, \_\_\_\_\_, acknowledge that preventing gender based violence (GBV) and violence against children (VAC) is important. The company considers that GBV or VAC activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. All forms of GBV or VAC are unacceptable be it on the work site, the work site surroundings, or at worker’s camps. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

Consent to police background check.

Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

Not participate in sexual contact or activity with children—including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.

Unless there is the full consent<sup>14</sup> by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.

Attend and actively partake in training courses related to HIV/AIDS, GBV and VAC as requested by my employer.

Consider reporting through the GRM or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

Wherever possible, ensure that another adult is present when working in the proximity of children.

Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.

Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.

Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children's images for work related purposes” below).

Refrain from physical punishment or discipline of children.

Refrain from hiring children for domestic or other labor which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

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<sup>14</sup> Consent is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

Comply with all relevant local legislation, including labor laws in relation to child labor.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.

Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.

Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.

Ensure images are honest representations of the context and the facts.

Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

Informal warning.

Formal warning.

Additional Training.

Loss of up to one week's salary.

Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.

Termination of employment.

Report to the police if warranted.

I understand that it is my responsibility to avoid actions or behaviors that could be construed as GBV or VAC or breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## **Annex 4: General Environmental Management Conditions for Maintenance/Maintenance Contracts**

### General

1. In addition to these general conditions, the Contractor shall comply with any specific Environmental Management Plan (EMP) for the works he is responsible for. The Contractor shall inform himself about such an EMP, and prepare his work strategy and plan to fully take into account relevant provisions of that EMP. If the Contractor fails to implement the approved EMP after written instruction by the Supervising Engineer (SE) to fulfil his obligation within the requested time, the Owner reserves the right to arrange through the SE for execution of the missing action by a third party on account of the Contractor.

2. Notwithstanding the Contractor's obligation under the above clause, the Contractor shall implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental performance requirements specified in an EMP. In general these measures shall include but not be limited to:

(a) Minimize the effect of dust on the surrounding environment resulting from earth mixing sites, asphalt mixing sites, dispersing coal ashes, vibrating equipment, temporary access roads, etc. to ensure safety, health and the protection of workers and communities living in the vicinity dust producing activities.

(b) Ensure that noise levels emanating from machinery, vehicles and noisy maintenance activities (e.g. excavation, blasting) are kept at a minimum for the safety, health and protection of workers within the vicinity of high noise levels and nearby communities.

(c) Ensure that existing water flow regimes in rivers, streams and other natural or irrigation channels is maintained and/or re-established where they are disrupted due to works being carried out.

(d) Prevent bitumen, oils, lubricants and waste water used or produced during the execution of works from entering into rivers, streams, irrigation channels and other natural water bodies/reservoirs, and also ensure that stagnant water in uncovered borrow pits is treated in the best way to avoid creating possible breeding grounds for mosquitoes.

(e) Prevent and minimize the impacts of quarrying, earth borrowing, piling and building of temporary maintenance camps and access roads on the biophysical environment including protected areas and arable lands; local communities and their settlements. In as much as possible restore/rehabilitate all sites to acceptable standards.

(f) Upon discovery of ancient heritage, relics or anything that might or believed to be of archaeological or historical importance during the execution of works, immediately report such findings to the SE so that the appropriate authorities may be expeditiously contacted for fulfilment of the measures aimed at protecting such historical or archaeological resources.

(g) Discourage maintenance workers from engaging in the exploitation of natural resources such as hunting, fishing, collection of forest products or any other activity that might have a negative impact on the social and economic welfare of the local communities.

(h) Implement soil erosion control measures in order to avoid surface run off and prevents siltation, etc.

(i) Ensure that garbage, sanitation and drinking water facilities are provided in maintenance workers camps.

(j) Ensure that, in as much as possible, local materials are used to avoid importation of foreign material and long distance transportation.

(k) Ensure public safety, and meet traffic safety requirements for the operation of work to avoid accidents.

3. The Contractor shall indicate the period within which he/she shall maintain status on site after completion of civil works to ensure that significant adverse impacts arising from such works have been appropriately addressed.

4. The Contractor shall adhere to the proposed activity implementation schedule and the monitoring plan / strategy to ensure effective feedback of monitoring information to project management so that impact management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.

5. Besides the regular inspection of the sites by the SE for adherence to the contract conditions and specifications, the Owner may appoint an Inspector to oversee the compliance with these environmental conditions and any proposed mitigation measures. State environmental authorities may carry out similar inspection duties. In all cases, as directed by the SE, the Contractor shall comply with directives from such inspectors to implement measures required to ensure the adequacy rehabilitation measures carried out on the bio-physical environment and compensation for socio-economic disruption resulting from implementation of any works.

#### Worksite/Campsite Waste Management

6. All vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be bonded in order to contain spillage. All waste containers, litter and any other waste generated during the Maintenance shall be collected and disposed at designated disposal sites in line with applicable government waste management regulations.

7. All drainage and effluent from storage areas, workshops and camp sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations.

8. Used oil from maintenance shall be collected and disposed of appropriately at designated sites or be re-used or sold for re-use locally.

9. Entry of runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution.

10. Maintenance/maintenance waste shall not be left in stockpiles along the road, but removed and reused or disposed of on a daily basis.

11. If disposal sites for clean spoil are necessary, they shall be located in areas, approved by the SE, of low land use value and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low-lying areas and should be compacted and planted with species indigenous to the locality.

#### Material Excavation and Deposit

12. The Contractor shall obtain appropriate licenses/permits from relevant authorities to operate quarries or borrow areas.

13. The location of quarries and borrow areas shall be subject to approval by relevant local and national authorities, including traditional authorities if the land on which the quarry or borrow areas fall in traditional land.

14. New extraction sites:

a) Shall not be located in the vicinity of settlement areas, cultural sites, wetlands or any other valued ecosystem component, or on high or steep ground or in areas of high scenic value, and shall not be located less than 1km from such areas.

b) Shall not be located adjacent to stream channels wherever possible to avoid siltation of river channels. Where they are located near water sources, borrow pits and perimeter drains shall surround quarry sites.

c) Shall not be located in archaeological areas. Excavations in the vicinity of such areas shall proceed with great care and shall be done in the presence of government authorities having a mandate for their protection.

- d) Shall not be located in forest reserves. However, where there are no other alternatives, permission shall be obtained from the appropriate authorities and an environmental impact study shall be conducted.
- e) Shall be easily rehabilitated. Areas with minimal vegetation cover such as flat and bare ground, or areas covered with grass only or covered with shrubs less than 1.5m in height, are preferred.
- f) Shall have clearly demarcated and marked boundaries to minimize vegetation clearing.
- 15. Vegetation clearing shall be restricted to the area required for safe operation of Maintenance work. Vegetation clearing shall not be done more than two months in advance of operations.
- 16. Stockpile areas shall be located in areas where trees can act as buffers to prevent dust pollution. Perimeter drains shall be built around stockpile areas. Sediment and other pollutant traps shall be located at drainage exits from workings.
- 17. The Contractor shall deposit any excess material in accordance with the principles of the general conditions, and any applicable EMP, in areas approved by local authorities and/or the SE.
- 18. Areas for depositing hazardous materials such as contaminated liquid and solid materials shall be approved by the SE and appropriate local and/or national authorities before the commencement of work. Use of existing, approved sites shall be preferred over the establishment of new sites.

#### Rehabilitation and Soil Erosion Prevention

- 19. To the extent practicable, the Contractor shall rehabilitate the site progressively so that the rate of rehabilitation is similar to the rate of maintenance.
- 20. Always remove and retain topsoil for subsequent rehabilitation. Soils shall not be stripped when they are wet as this can lead to soil compaction and loss of structure.
- 21. Topsoil shall not be stored in large heaps. Low mounds of no more than 1 to 2m high are recommended.
- 22. Re-vegetate stockpiles to protect the soil from erosion, discourage weeds and maintain an active population of beneficial soil microbes.
- 23. Locate stockpiles where they will not be disturbed by future maintenance/Maintenance activities.
- 24. To the extent practicable, reinstate natural drainage patterns where they have been altered or impaired.
- 25. Remove toxic materials and dispose of them in designated sites. Backfill excavated areas with soils or overburden that is free of foreign material that could pollute groundwater and soil.
- 26. Identify potentially toxic overburden and screen with suitable material to prevent mobilization of toxins.
- 27. Ensure reshaped land is formed so as to be inherently stable, adequately drained and suitable for the desired long-term land use, and allow natural regeneration of vegetation.
- 28. Minimize the long-term visual impact by creating landforms that are compatible with the adjacent landscape.
- 29. Minimize erosion by wind and water both during and after the process of reinstatement.
- 30. Compacted surfaces shall be deep ripped to relieve compaction unless subsurface conditions dictate otherwise.
- 31. Re-vegetate with plant species that will control erosion, provide vegetative diversity and, through succession, contribute to a resilient ecosystem. The choice of plant species for rehabilitation shall be done in consultation with local research institutions, forest department and the local people.

#### Water Resources Management

- 32. The Contractor shall at all costs avoid conflicting with water demands of local communities.
- 33. Abstraction of both surface and underground water shall only be done with the consultation of the local community and after obtaining a permit from the relevant Water Authority.<sup>34</sup> Abstraction of water from wetlands shall be avoided. Where necessary, authority has to be obtained from relevant authorities.



35. Temporary damming of streams and rivers shall be done in such a way avoids disrupting water supplies to communities downstream, and maintains the ecological balance of the river system.
36. No maintenance/Maintenance water containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural water drainage courses.
37. Wash water from washing out of equipment shall not be discharged into water courses or road drains.
38. Site spoils and temporary stockpiles shall be located away from the drainage system, and surface run off shall be directed away from stockpiles to prevent erosion.

#### Traffic Management

39. Location of access roads/detours shall be done in consultation with the local community especially in important or sensitive environments. Access roads shall not traverse wetland areas.
40. Upon the completion of civil works, all access roads shall be ripped and rehabilitated.
41. Access roads shall be sprinkled with water at least five times a day in settled areas, and three times in unsettled areas, to suppress dust emissions.

#### Blasting

42. Blasting activities shall not take place less than 2km from settlement areas, cultural sites, or wetlands without the permission of the SE.
43. Blasting activities shall be done during working hours, and local communities shall be consulted on the proposed blasting times.
44. Noise levels reaching the communities from blasting activities shall not exceed 90 decibels.

#### Disposal of Unusable Elements

45. Unusable materials and Maintenance elements such as electro-mechanical equipment, pipes, accessories and demolished structures will be disposed of in a manner approved by the SE. The Contractor has to agree with the SE, which elements are to be surrendered to the Client's premises, which will be recycled or reused, and which will be disposed of at approved landfill sites.
46. As far as possible, abandoned pipelines shall remain in place. Where for any reason no alternative alignment for the new pipeline is possible, the old pipes shall be safely removed and stored at a safe place to be agreed upon with the SE and the local authorities concerned.
47. AC-pipes as well as broken parts thereof have to be treated as hazardous material and disposed of as specified above.
48. Unsuitable and demolished elements shall be dismantled to a size fitting on ordinary trucks for transport.

#### Health and Safety

49. In advance of the maintenance/Maintenance work, the Contractor shall mount an awareness and hygiene campaign. Workers and local residents shall be sensitized on health risks particularly of Cholera, tetanus and Hepatitis.
50. Adequate road signs to warn pedestrians and motorists of maintenance/Maintenance activities, diversions, etc. shall be provided at appropriate points.
51. Maintenance/Maintenance vehicles shall not exceed maximum speed limit of 40km per hour.

#### Repair of Private Property

52. Should the Contractor, deliberately or accidentally, damage private property, he shall repair the property to the owner's satisfaction and at his own cost. For each repair, the Contractor shall obtain from the owner a certificate that the damage has been made good satisfactorily in order to indemnify the Client from subsequent claims.

53. In cases where compensation for inconveniences, damage of crops etc. are claimed by the owner, the Client has to be informed by the Contractor through the SE. This compensation is in general settled under the responsibility of the Client before signing the Contract. In unforeseeable cases, the respective administrative entities of the Client will take care of compensation.

#### Contractor's Environment, Health and Safety Management Plan (EHS-MP)

54. Within 6 weeks of signing the Contract, the Contractor shall prepare an EHS-MP to ensure the adequate management of the health, safety, environmental and social aspects of the works, including implementation of the requirements of these general conditions and any specific requirements of an EMP for the works. The Contractor's EHS-MP will serve two main purposes:

For the Contractor, for internal purposes, to ensure that all measures are in place for adequate EHS management, and as an operational manual for his staff.

For the Client, supported where necessary by a SE, to ensure that the Contractor is fully prepared for the adequate management of the EHS aspects of the project, and as a basis for monitoring of the Contractor's EHS performance.

55. The Contractor's EHS-MP shall provide at least:

a description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in an EMP;

a description of specific mitigation measures that will be implemented in order to minimize adverse impacts;

a description of all planned monitoring activities (e.g. sediment discharges from borrow areas) and the reporting thereof; and

the internal organizational, management and reporting mechanisms put in place for such.

56. The Contractor's EHS-MP will be reviewed and approved by the Client before start of the works. This review should demonstrate if the Contractor's EHS-MP covers all of the identified impacts, and has defined appropriate measures to counteract any potential impacts.

#### EHS Reporting

57. The Contractor shall prepare bi-weekly progress reports to the SE on compliance with these general conditions, the project EMP if any, and his own EHS-MP. An example format for a Contractor EHS report is given below. It is expected that the Contractor's reports will include information on:

EHS management actions/measures taken, including approvals sought from local or national authorities;

Problems encountered in relation to EHS aspects (incidents, including delays, cost consequences, etc. as a result thereof);

Lack of compliance with contract requirements on the part of the Contractor;

Changes of assumptions, conditions, measures, designs and actual works in relation to EHS aspects; and

Observations, concerns raised and/or decisions taken with regard to EHS management during site meetings.

#### Training of Contractor's Personnel

58. The Contractor shall provide sufficient training to his own personnel to ensure that they are all aware of the relevant aspects of these general conditions, any project EMP, and his own EHS-MP, and are able to fulfil their expected roles and functions. Specific training should be provided to those employees that have particular responsibilities associated with the implementation of the EHS-MP.

General topics should be:

EHS in general (working procedures);

Emergency procedures; and

Social and cultural aspects (raise awareness on social issues).

Cost of Compliance

59. It is expected that compliance with these conditions is already part of standard good workmanship and state of art as generally required under this Contract. The item “Compliance with Environmental Management Conditions” in the Bill of Quantities covers this cost. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable EHS impact.

## **Annex 5: Project Traffic Management Plan (Sample)**

### **1. Introduction**

This Traffic Management Plan describes procedures and protocols for site access, traffic routing and management, and contractor company guidelines with respect to vehicle and employee transportation in delivering their obligations on this intervention project. Public, employee and contractor safety is the primary goal of this plan. It is vital that the Contractor recognizes that the traffic within the project area will be dynamic throughout the course of execution of this works and the safety of other road users is absolutely essential during this time.

### **2. General Site Access**

In the interest of site security and public safety, access to operational areas or locations where heavy duty machinery would be operated in related to the execution of this contract will be restricted to authorized site personnel through the usage of signs and gates where appropriate. Facilities that potentially present danger to persons or wildlife such as the electrical substation, equipment staging area and workers camp will be fenced or barricaded as appropriate to prevent general access.

### **3. Traffic Management**

All traffic on routes to and from the site will be radio controlled. Where this is not possible, signage will be installed at appropriate locations in order to warn the public along these routes.

In the event that temporary closure occurs, access to the sites will be further restricted through the use of fences and gates as appropriate. Access to work areas such as temporary excavated places, or confined spaces where work is ongoing will be securely blocked by means of a temporary but robust barrier or barricade. Buildings and ancillary facilities will be locked and secured. A number of additional general measures related to site access, road management and public safety and construction events notification are presented here:

Private employee off-road vehicles or private transport buses will be prohibited from entry into the site.

Signage will be posted near all construction sites.

Notifications will be provided for activities that would be carried out over the weekend or public holiday periods. These would be disseminated through existing social institutions such as the village or district heads of communities, Local Government Councilors and NGO's or CBO's

Speed limit maintained at 10 km/hr speed limit within or near the communities;

Install reverse alarm fitted on all trucks, heavy duty equipment and off road vehicles

Employ or engage the use of a minimum of two flagmen around excavated areas, one for traffic approach and one to direct traffic away from the sites

In accordance with the Occupational Health and Safety Regulations for public roads, use of flashing devices/trafficators on all vehicles/machinery and equipment that will cross, travel on or may otherwise pose a risk to users of public roads.

### **4. Employee Transportation**

To the extent possible employees will use buses provided by the contractor as transportation to and from the site, thereby reducing overall vehicle traffic. Project vehicles or will be utilized by staff, only when necessary.

### **5. Speed Limits**

Speed limits will be enforced to and from the site and signage(s) shall be posted along the access and site roads (maximum 40 km/hr, reduced to 20 km/hr at blind corners and bridge crossings. Traffic along other access roads will be radio controlled for safety and speed control. Furthermore, employees and contractors will be educated on safety including traffic protocols and speed limits during mandatory orientation. Routine traffic inspections and/or speed indicator signs will be used to encourage safe and responsible driving.

#### 6. Communications And Notification Protocols

It is anticipated that the intervention project will require only single-lane temporary closures. Signage warnings of construction activities on the roads will be placed at appropriate distances from the construction site, in consultation with SPIU, Ministry of Transports, department of Highways & Public Works. For significant work activity (those requiring more than one day to complete), written notification will be distributed to residents and the SPIU, Ministry of Transport, department of Highways & Public Works will be notified. A public notice would be posted at multiple locations in the metropolis to communicate to residents any new activities that may be occurring or scheduled. Contact information for the Contractors senior management will be included in this notice and any concerns regarding the intervention work/project or traffic management can be forwarded through this notification system.

#### 7. Traffic Routing and Volumes

Alternative traffic routing shall be mapped out and provided in the event that there will be complete closure of the road due to this intervention work activity. Traffic officers and appropriate road diversion signage(s) shall be deployed to ensure diversions routes are properly identified and traffic is directed along the mapped route. The flagmen shall be properly kitted in their Personal Protective Equipment (PPE), such as reflector vests and safety boots, to ensure that safety on the job is given due priority.

#### 8. Reporting

Records on traffic management and implementation of this plan should be kept and updated by the contractor as evidence of ongoing mitigation compliance, which will be submitted to SPIU as part of routine reports on progress of work.

## **Annex 6: Contingency and Emergency Response Plan (Sample)**

### Introduction

An emergency is best described as a serious situation or unforeseen crisis that happens unexpectedly and requires or demands immediate/necessary action. This is often associated with danger. Therefore, this plan has been prepared to establish a process that has been adopted by our organization to respond to any emergency situation. This plan has the following fundamental objectives are:

To ensure that we can identify how to prepare for an emergency  
Provide a checklist of actions that would enable our team prepare to handle such emergencies

### The objective

The aim of this plan is therefore to examine a series of steps in the process, which is designed to ensure that any situation that necessitated that the status of emergency be apportioned, be managed in a manner that would ameliorate this condition.

Thus, this plan provides guidelines on the best approach that would be engaged by employees of the Contractor company in emergency situations, which may be as a consequence of the following:

- Medical (health)
- Safety
- Environmental
- Security
- Any other types of emergencies

### Emergency Response Team (ERT)

An emergency response team will be constituted for the project. These will be the group of persons that would have the responsibility of managing this emergency plan in a manner that would ensure the goals of this plan are achieved. For this reason, the members of the ERT are:

- Managing Director (or representative)
- HSEQ Officer
- Project Engineer
- Supervisor
- Support members (headmen from units – civil, mechanical, electrical etc.)
- Supervising Consultant representative
- SPIU representative

### Emergency Response Centre (ERC)

Due to the temporary nature of the facilities that would be utilized as workers camp & site office, for intervention projects, the site office will also be converted into the Emergency Response Centre (ERC), in cases of emergency. Therefore, appropriate communication equipment shall be available in the office, to ensure that the channels of contact are available, at all times.

In the minimum our ERC will have:

A computer system with internet facilities available

A telephone

A public address system

Activation of this Emergency Response Centre

The individual that receives the information that could potentially necessitate an emergency response should immediately convey the information to the Project Engineer.

Jointly, the project engineer and the Safety officer will review the situation/information, following which the managing director will be contacted (if not on site).

The managing director will hereafter take the decision of the gravity of the situation, following which it may be necessary to constitute an ERT and convert the site office into the ERC.

Core ERT and support members will be represented once the ERC is activated.

Checklist of Emergency Response Actions

These actions shall be implemented immediately the ERC is activated:

<b>S/n</b>	<b>Actions</b>
1.	Verify status of emergency and likely exposure of other personnel to risk, ensure ERT members are fully equipped in emergency response equipment
2.	Locate and account for all personnel on site (muster point) and if appropriate, implement the evacuation procedure, if necessary. Review decision on need to establish contact with family of personnel involved in emergency
3.	Establish and maintain close contact with relevant authorities related or connected to the resolving of this emergency. e.g. in case of medical emergency, a hospital, security emergencies will require a contact with government law enforcement agencies – police etc.
4.	Inform supervising consultant & SPIU representative as promptly as possible in order to establish interface link with Client
5.	Transmit any information update or changes in situation status to emergency focal group; the managing director and members of the ERT and determine if there is a need to shut down critical on going operational activities
6.	Depending on the type of emergency, any necessary follow up action should be determined and promptly acted upon, as may be required e.g. medical emergencies may require evacuation, environmental emergencies may require containment, safety emergencies may require prompt cordoning off of area etc.
7.	Internal Communication channel with other personnel should be kept open, by means of public address system or telecommunication (walkie talkies) and updates provided to forestall any likely re-occurrences, where possible
8.	Examine cross-cutting impact of emergency on liability issues and operational continuity. e.g. media involvement in security emergencies
9.	Undertake an assessment of risk to review other potential liabilities and deploy mitigation

	measures, where necessary. e.g. workmen compensation insurances in case of accident emergencies
10.	Review all cost implications of emergency response actions and make necessary budgetary provisions
11.	Provide the SPIU with updates immediately additional information is received.

### Accident reporting

This accident report would be factual, free from hearsay, assumptions, gossips and / or preliminary conclusions. The report shall be duly signed by the Project engineer. The SPIU shall be briefed about the accident in writing within 24 Hours.

### Timing of investigation

The investigation should be carried out as soon as possible after the accident. The quality of evidence can deteriorate rapidly with time and delayed investigation are usually not as conclusive as those performed with dispatch. A prompt investigation is a good demonstration of management concern for safety.

### Scope of Investigation

The scope of the investigation can be divided into four areas:

Personnel

Technique

The Environment

Organization

In each of these areas, actions of omission may be identified which could be a factor contributing to the accident or subsequent injury, damage or loss.

### Establishment of the fact

In establishing the fact(s) of an accident, we would consider the followings as necessary factors:

Background information that would be considered,

the procedure for this type of operations

command structure

the person involved

### Facts collection

Facts collection shall include but not limited to topography, weather, warning signs /notices, condition of the equipment, housekeeping, before interview can be conducted.



**ACCIDENT REPORT AND INVESTIGATION**  
**(Standard report form)**

Date: -----

Time: -----/AM/PM

Location: -----

Department: -----

Supervisor: -----

Name of Victim: -----

Nationality: -----

Address: -----

Marital Status: -----

Occupation:-----

Date of Birth: -----

Experience (years):-----

Equipment/tools being used when accident occurred:-----  
-----  
-----

Description of accident:-----  
-----  
-----

Name of Witness (if any): -----  
-----

Conditions during accident: weather- dry, rain, clear, dusk, dark etc.

Unsafe acts, actions and conditions (Please describe):-----  
-----  
-----

Report verification by:

Name: -----Date: -----

## Annex 7: Waste Management Plan

No	Project Activity	Potential Impact	Proposed Mitigation Measures/ Actions	Responsibility for mitigation	Cost (NGN)
I. Pre-Construction Phase					
4.	Mobilization of personnel	Increase demand on existing community health and sanitation infrastructure	Establish worker's camp and provide all basic amenities (water, sanitation etc.). Prohibit workers from unauthorized access to community infrastructure	Contractor	325,000
10.	Use of Workers Camp/Site Office	Generation of sanitary waste	Ensure provision of sanitary facilities on site for workers and enforce usage. Ensure usage of Adamawa waste management agency approved waste vendor for waste evacuation & disposal.	Contractor	300,000
17.	Movement of plant & equipment to and from staging area to site	Soil contamination	Develop and implement a site-specific Waste Management Plan (WMP) Prepare and implement an Emergency Response Plan to respond to incident of spillage. Ensure fuel storage tanks are installed in a bonded area and checked daily. Ensure regular maintenance of vehicles to avoid leaks of oil. Prevent unregulated dumping of fuel waste Ensure local communities are sensitized on need to avoid tampering with waste bins	Contractor	250,000
19.	Use of workers camp/site office	Sanitation issues and public health impacts	Provide trash bins on site for temporary storage of domestic waste such as lubricant containers, drinking water sachets and carrier bags/packaging materials. Dispose all construction and domestic waste at the approved dumpsites and in the approved manner. Ensure all trenches or excavations made during the construction works do not collect stagnant water, which could breed mosquitoes. Ensure access to toilets for construction crew or provide temporary toilets (mobile toilets) for use where there are no existing ones. Ensure mobile toilets/sanitary provisions are provided to reflect gender types.	Contractor/ Engineering Consultant  Environmental Safeguards Specialist	237,500

			Ensure regular toolbox meetings are held among contractor workers to offer awareness on transmission of contagious or communicable diseases.		
21.	Rehabilitation/upgrade & Construction work activities	Generation of construction waste including spoils, debris and concrete	Develop and implement a site-specific Waste Management Plan (WMP) to include the following: Ensure segregation of waste to facilitate reuse and recycling opportunities. Ensure no burning of waste on site. Ensure usage of ADAMAWA ASWAMA approved waste vendor for waste evacuation, processing & disposal.	Contractor	200,000
25.	Commissioning of water supply infrastructure	Generation of construction waste and debris	Develop and implement a site-specific Waste Management Plan (WMP) to include the following: Ensure segregation of waste to facilitate reuse and recycling opportunities. Site visit at the completion of project to ensure no waste is left behind.	Contractor	Part of Maintenance cost
29.	All decommissioning activities	Waste management	* Re-vegetate areas around workers camp & Maintenance equipment sites to restore the landscape. * Ensure that any remaining metal or pvc pipes, or other waste streams created during Maintenance activities and waste generated during decommissioning activities are collected from the project sites and properly disposed before handing over the project.	Contractor	250,000
<b>Sub-Total Mitigation</b>					<b>N1,562,500</b>

## **Annex 8: Cultural Heritage Management/Chance Find Procedure**

### **Identification and Assessment**

For Cultural Heritage Management (CHM) under the Adamawa MCRP, Inventory will always be a key management tool in the area of **identification and assessment**. The extent to which inventories are prepared will depend on criteria adopted by the PCU and in lines with requirements or guidelines by the WB.

The principal best practice in assessing cultural heritage issues around roads to be rehabilitated under the Adamawa MCRP is to have a thematic and individual value assessment procedure in place, so as to justify long-term conservation of an asset. The aim of an identification and assessment process should be not only the identification of places, but also the establishment of a hierarchy of significant places under a thematic system.

### **Best Practice Inputs**

1. The MCRP should have a standard inventory form, also available as a Standard Operating Procedure (SOP).
2. Inventory should be updated as new information comes to light, or as new technology is introduced eg. GPS plotting of sites.
3. Inventory is thematically linked and has the primary aim of revealing a hierarchy of significant places under a variety of relevant themes.
4. Inventory work focuses on geographic areas or themes where there is little recorded inventory and a potential threat exists to unrecorded sites.
5. Each road project area has assessment criteria and an assessment process, both of which have been endorsed by the PCUs Safeguard Unit and WB.
6. The MCRP PCU should maintain a CHM database containing all information relating to history and management of CHM assets with cross-reference to other state inventories.
7. Assessment of significance of heritage places by an external CHM specialist should be a prerequisite for major capital expenditure on any CHM asset.

### **Allocating Resources**

Best Practice inputs/Indicators

1. There should be provision for access to a capital works budget for CHM catch up maintenance.
2. The Adamawa MCRP PCU should plan for an ongoing core funding base for cyclical maintenance of CHM assets within each institution responsible for CHM and the reflection of this responsibility in the expected outputs.
3. Ensure risk management actions for CHM emergencies.
4. Prioritization of resource allocation to places on a thematic significance basis. This should be founded on an understanding of the history of land under management and broader state or national themes.
5. The proportion of CHM staff /institutional responsibilities to CHM assets managed should be similar to the proportion of staff to assets in other functional areas within the organization.
6. Identification of core competencies for CHM staff/institutional responsibilities and competency-based recruitment procedures including assessment of competencies by a CHM specialist.
7. The PCU should ensure that training in core CHM competencies are integrated into PCU training programs. (Including instruction in broad CHM principles and specific standard operating procedures)
8. Development of a suite of partnership tools to expand CHM management options eg. Local government management, community participation.
9. Regular analysis of CHM assets to ensure that each asset is managed by the MCRP PCU with the best expertise, resources, motivation and local presence to effectively conserve that place, and to present the place if it is appropriate to do so.
10. Comprehensive guidelines and programs to promote and support active community involvement in CHM.
11. All leases on CHM assets include provision for specific ongoing works funded by lessee.
12. Revenue generated from CHM should be retained for CHM without a corresponding drop in budget funding, in order to encourage sustainable management.

### **Protection**

1. The MCRP should ensure that the process of acquiring places with a range of conservation or heritage values (natural, historic and indigenous) should take into account all the identified values and provide for their future management.
2. If the PCU considers acquisition is not an option, or is unnecessary, then other options including reserving, listing on a state heritage register, voluntary conservation agreement, covenanting, gazetting or referral to another relevant authority are pursued, with the co-operation of the owner.
3. The MCRP risk management strategy addresses the need for staff training and appropriate checks and balances to minimize the threat to CHM assets by in-house staff.

### **Conservation**

1. Conservation of places of cultural significance should be done according to a plan – a conservation management plan (CMP).
6. The breadth and detail of CMPs are commensurate with the needs of the place.

7. Shorter CMPs for individual sites, tailored to specific circumstances, should be prepared where; there is urgency to do the work, or the issues are simple and the vision statement for the place dictates action, or the plan forms part of a broader management plan.
8. Broad management plans or 'historic area plans' are prepared for larger land areas with predominantly historic values or places with multiple, geographically linked heritage assets. Work specifications or shorter CMPs are then prepared for each identified heritage asset in the area.
9. All CMPs are signed off by, at the minimum, by the PCUs Safeguard Unit (or their equivalent) to ensure organizational 'buy-in'.
10. Properly costed work specifications, together with plans, must be prepared to relevant industry standards
11. Provision is made for a CHM specialist to inspect progress and ensure that work is proceeding according to the plan and that all work is supervised and conducted by skilled conservation practitioners or tradespeople.
12. Where sites have a multiplicity of values (e.g. natural and cultural as well as historic), then an overarching integrated management plan is prepared for that place. Cultural heritage is a component of such a plan.

### **Monitoring**

Physical monitoring of sites of cultural heritage will require synergized involvement attention by several relevant state and national agencies e.g. State Ministry for Culture and Tourism.

### **Best Practice Inputs/Indicators**

The Adamawa MCRP PCU should ensure:

1. The use of a formal asset management and monitoring system for CHM assets.
2. Annual reporting of agreed performance measures
3. Auditing of CHM to ensure management objectives are met
4. Integration of heritage places into organizational asset management systems.
5. A process existing for consistently reviewing plans, quality of planning and those who prepare them.
6. Establishment of a register of contract CHM specialists that is regularly reviewed on the basis of existing contractors' work, allows for the addition of new contractors and is open to public inspection.
7. Long term monitoring of the condition of cultural heritage places
8. Regular meetings of Adamawa MCRP PCU Staff and CHM specialists as a means of monitoring progress towards best practice and assisting agencies to set higher levels of best practice.
9. Ongoing market research to measure effectiveness of presentation in interpreting specific places, raising awareness of cultural heritage conservation and encouraging appropriate growth in visitor numbers.
10. A CHM strategy/policy document which is published and subject to public consultation and scrutiny
11. Monitoring of visitor numbers at all actively managed places

## Annex 9: Labour Influx Plan

This plan identifies labour requirements and sets out the procedures for addressing labour conditions and risks associated with the proposed project, which is aimed at helping Adamawa MCRP to determine the resources necessary to address project labor issues.

SUB-CATEGORY	WORKER IMPACTS\RISKS	PROJECT IMPACTS\RISKS	MITIGATION MEASURES	MONITORING	MONITORING FREQUENCY	RESPONSIBILITY
Employment	Influx of many foreigners into project community	Competition on livelihood and job opportunity with locals	60 of unskilled labour shall be from the project community. Where possible qualified skilled workers on contract shall also be sourced within the community	Verify	Onset of Project and bi-weekly	ESO; SSO
Housekeeping.	The general appearance of the camp deteriorates making camp life unpleasant.	The overall camp experience is compromised which in turn leaves workers demoralised and unproductive.	Ensure that camp grounds and common areas are routinely cleaned and organised with appropriate signage in place, and that grounds are maintained (e.g., grassed areas are regularly mown).  Establish easily accessible, designated smoking areas which are clearly highlighted and regularly cleaned.	Verify	Monthly	ESO; SSO
Recreation.	Workers spend most of their time in the camps and could become disenchanted and bored. They may want to leave the camps and go into the local towns and villages in search of recreation.	Tensions arise from the local communities as workers impact their activities in search of recreation. An increase in alcohol consumption and prostitution could result due to the influx of workers into local communities.	Provide appropriate recreational facilities and activities. These should be discussed with the camp residents committee.	Assessment	Quarterly	ESO; SSO

Spiritual /Religion.	Workers will want access to places of worship for their chosen religion. They may leave the camps and go into the local towns and villages in search of an appropriate place of worship.	Tensions arise from the local communities as workers impact their activities.	Provide appropriate places of worship where residents express a need for this in accordance with cultural sensitivities, and assess transport arrangements on a case-by-case basis.  Ensure that equipment and facilities are kept clean and well maintained.	Assessment	Quarterly	ESO; SSO
<b>SUB-CATEGORY</b>	<b>WORKER IMPACTS\RISKS</b>	<b>PROJECT IMPACTS\RISKS</b>	<b>MITIGATION MEASURES</b>	<b>MONITORING</b>	<b>MONITORING FREQUENCY</b>	<b>RESPONSIBILITY</b>
Security.	Inconsistent and aggressive behaviour of security personnel towards workers can result in tensions and conflict in the workplace and a perception of human rights abuses.	Insufficient training and control of security personnel can lead to the inappropriate use of force, while protecting Project workers and assets, or inappropriate behaviour towards local populations, resulting in human rights claims.	Ensure that camp security personnel meet at least the following requirements:  <ul style="list-style-type: none"> <li>• Have not been implicated in past abuses</li> <li>• Are trained in appropriate conduct towards workers and community members including: <ul style="list-style-type: none"> <li>o Exercising constraint and caution and understand how force may be used</li> <li>o Respecting human rights</li> <li>o Behaving consistently</li> <li>o Knowing and abiding by applicable laws</li> <li>o Fostering good community relations through their interaction and behaviour towards the workforce and communities</li> </ul> </li> </ul>	Assessment	Quarterly	ESO; SSO
Community relations.	Communities are negatively impacted by camp activities: noise, waste, traffic, lighting and so forth. This	Workers are stopped from going to work, which affects productivity.	Implement control measures to avoid and minimise the impacts of camp and living conditions on communities.  Limit foreign worker interaction with	Assessment	Quarterly	ESO; SSO



	may result in negative actions towards camp operations such as road closures and the prevention of workers or suppliers from entering the worksite.		communities and provide cultural sensitivity awareness training to facilitate appropriate interaction with communities.			
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## Annex 10: List of Persons Met During Study

S/N	NAME	PHONE NUMBER	LGA	COMMUNITY
1	Mohammed Sale	8066675787	Gombi	Garkida
2	Ayuba Audu	7061961654	Gombi	Zakama
3	Mohammed Buba	7039210068	Gombi	Garkida
4	Samson Balami	7039641950	Gombi	Garkida
5	Samuel Dauda		Gombi	Garkida
6	Diwan Gwagwa	8149559433	Gombi	Garkida
7	Abubakar Abacha		Gombi	Garkida
8	Musa Umaru Bewa	8168041711	Gombi	Garkida
9	Barnabas Mshelbwala		Gombi	Garkida
10	Saidu Abba	8134050031	Gombi	Garkida
11	Madu Gwani	8064562289		yungur
12	Musa Zoka			fulani
13	Shagari Ahmad	8100646233		fulani
14	Buba Maja			yungur
15	Sabo Nuhu	9056381492	Gombi	yungur
16	Mubarak Usman	7064299243	Gombi	fulani
17	Jauro habu sale	7038315150	Gombi	Ajiya
18	Abubakar Gaskiya	7057103940	Gombi	Garkida
19	Jibir Fidano		Gombi	Garkida
20	Hamidu Tarfa	7036361911	Gombi	south-garkida
21	Dalhatu Banu	8069111997	Gombi	Garkida
22	Galadima Musa		Gombi	Garkida
23	Isaa Alkali Biri	7038974735	Gombi	Garkida
24	Umaru Mbewa	8168041711	Gombi	Garkida
25	Titus Irmiya		mubi-north	vimtim
26	sylvester jigodia	9027714987	mubi-north	vimtim
27	Aishatu santuraki	7035583173	mubi-north	vimtim
28	Ibrahim sabundu	8022013220	mubi-north	vimtim
29	Ahmad Ibrahim	8036963113	mubi-north	kolere
30	kulu ibrahim	9030751894	mubi-north	kolere
31	Abdulazeez Aminu	8065562339	mubi-north	kolere
32	Esther Elijah	7035498914	mubi-north	kolere
33	linda samson	8060732190	mubi-north	sabon layi
34	Musa Abubakar	8001690465	mubi-north	sabon layi
35	Maryam umar	8080165803	mubi-north	sabon layi
36	Hamza Idris	8103877239	mubi-north	sabon layi
37	Salli Ahmadu	9079017280	mubi-north	Betso
38	Dinatu john	7085951854	mubi-north	Betso
39	Muazu Samaila	8050762082	mubi-north	Betso
40	Mohammed Bello	7058827571	mubi-north	Betso
41	CatechetJohanna	9025889667	mubi-north	Mayo-bani
42	Ahmadu Yuguda	8062570879	mubi-north	Mayo-bani
43	Anthonia marcel	9059098807	mubi-north	muchalla
44	Deborah Anthony	8051990096	mubi-north	mijilu
45	Duhu A damu	8020783440	mubi-north	Bahuli
46	Aishatu goni	8051038083	mubi-north	Digil

47	Hannatu Stephen	8065083500	mubi-north	Lokwa
48	Fatima Suleiman	7037703808	mubi-north	Yelwa
49	Zubairu Umar	8029791296	maiha	Sorau "A"
50	Ramatu Suleiman	9076254831	maiha	Sorau "A"
51	Modibbo Abdullahi	7015497379	maiha	Sorau "A"
52	Abbas Maina	8080820066	maiha	Sorau "A"
53	Ishaqa Mohammed	7083454342	maiha	Maiha Gari
54	Fadimatu Mumini	9072683879	maiha	Maiha Gari
55	Yusuf Abdullahi	8027537954	maiha	Maiha Gari
56	Sunday Andrawus	8025699211	maiha	Maiha Gari
57	Sali Bakari	7083456335	maiha	Tambajam
58	Halima Usman	7010525621	maiha	Tambajam
59	Ahmad Mohammad	7083476900	maiha	Tambajam
60	Varuwan Wadan	9027975560	maiha	Tambajam
61	Yahaya Ahmad	8037142891	maiha	Pakka
62	Jenies Isaac	7039696635	maiha	Pakka
63	Yusuf Ahmadu	8130694111	maiha	Pakka
64	Markus Abana		maiha	Pakka
65	Hassan Ngura	7061523592	maiha	Humbutudi
66	Ruth Ayuba	7036361032	maiha	Humbutudi
67	Chubadu Hayatu		maiha	Humbutudi
68	Markus Andrawus	8065853124	maiha	Humbutudi
69	Abdullahi Sajo	8061286149	maiha	Mayo-nguli
70	Hauwa Yunusa	8035365593	maiha	Mayo-nguli
71	Amina Mohammed	8140296545	maiha	Mayo-nguli
72	Samuel Yakubu		maiha	Mayo-nguli
73	Gabbu Aminu	8134104834	Mubi-South	Gella
74	Barnabas Ayuba	9060695785	Mubi-South	Gella
75	Yakubu Salihu	8140122243	Mubi-South	Gella
76	Gambo Ahmadu	8030563013	Mubi-South	Gella
77	Hindatu Emmanuel	8165097525	Mubi-South	Lamurde
78	Adamu kwaji		Mubi-South	Lamurde
79	Musa Abdullahi	8066928795	Mubi-South	Lamurde
80	Haruna Abubakar	7061336585	Mubi-South	Lamurde
81	Noyi samuel	8134000047	Mubi-South	Nassarawo
82	Hajara Mahmud	8022607335	Mubi-South	Nassarawo
83	Mohammed Adamu	9034266779	Mubi-South	Nassarawo
84	yahaya usman	7036198856	Mubi-South	Nassarawo
85	Tabitha Daniel	8027781105	Mubi-South	Mugulbe
86	Joshua Yakubu		Mubi-South	Mugulbe
87	Mohammede Muda	7087526588	Mubi-South	Mugulbe
88	Marabo Hammajumba		Mubi-South	Mugulbe
89	Ezekiel Fadi		mubi-south	Ndukku
90	Ishaku Chena		mubi-south	Ndukku
91	Yusuf Kawu		Mubi-South	Ndukku
92	Daniel Yakubu	7012564492	Mubi-South	Ndukku
93	Saraya Joshua	8142518885	Mubi-South	Mujara
94	Yusuf Ayuba		Mubi-South	Mujara
95	Saidu Ishaya		Mubi-South	Mujara
96	Ibrahim mamman	8036346906	Mubi-South	Mujara
97	Kenan Isa	7011887097	Hong	Hosherizum

98	Hyeladi Richard	8148496477	Hong	Hosherizum
99	Umaru Buba		Hong	Hosherizum
100	Simon Yohanna	8123074838	Hong	Hosherizum
101	Musa Dalhatu	8069588851	Hong	Hosherizum
102	Esther Ezra	8023755813	Hong	Gaya
103	Sale Jacob		Hong	Gaya
104	Esthon Adamu		Hong	Gaya
105	Dahiru Mafuda		Hong	Gaya
106	Mercy Godwin	9066779646	Hong	Dagsiri
107	Charles Pakam		Hong	Dagsiri
108	Musa Isa	8069267361	Hong	Dagsiri
109	Zakariya Umar	7064650668	Hong	Dagsiri
110	Kat Dauda	7064798381	Hong	Bangshika
111	Ahijo Isa	7066846859	Hong	Bangshika
112	Valada Kadala		Hong	Bangshika
113	Tainu Buba	7037767843	Hong	Bangshika
114	Janet Christopher	8025055696	Hong	Garaha
115	William Phillibus		Hong	Garaha
116	Wandiyahyel Ibrahim	8123074338	Hong	Garaha
117	Malam Mustapha	7089461056	Hong	Garaha
118	Adama Abdu	8086680851	Hong	Hong main
119	Mamman Yusuf		Hong	Hong main
120	Musa Suleiman	7036607711	Hong	Hong main

## **Annex 11: Camp Management Plan**

Company X (the Company) has developed this Camp Management Plan as part of its Environmental and Social Management Plan (ESMP) outlining a range of mitigation measures designed to avoid or reduce undesired camp management impacts during construction. This document establishes a basis and template for use by the Contractor(s) to develop their own plans outlining not only mitigation measures but to also incorporate the roles and responsibilities described in the ESMP.

The objectives of the Camp Management Plan are:

Avoid or reduce negative impacts on the community and maintain constructive relationships between local communities and workers' camps; and

Establish standards on worker welfare and living conditions at the camps that provide a healthy, safe and comfortable environment.

This Plan should be read in conjunction with other environmental and social management plans (ESMPs), if available including:

- Traffic Management Plan
- Security Plan
- Stakeholder Engagement Plan

### **Legal Requirements and Grievances**

The Contractor is required to operate within the parameters of the Nigeria Labour Law and the International Labour Organization guidelines. The World Bank Performance Standards are applicable to MCRP and its sub projects. Furthermore, the Grievance Redress Mechanism contained in this ESMF is required to be adhered to by the Contractor.

Contractor personnel shall conduct regular safety walks and an HSE committee will track performance against requirements stipulated in this plan. The Contractor will also have its grievance mechanism developed for the project.

Additionally, Contractor would be required to sign and acknowledge the Code of Conduct and agree to abide by its provisions.

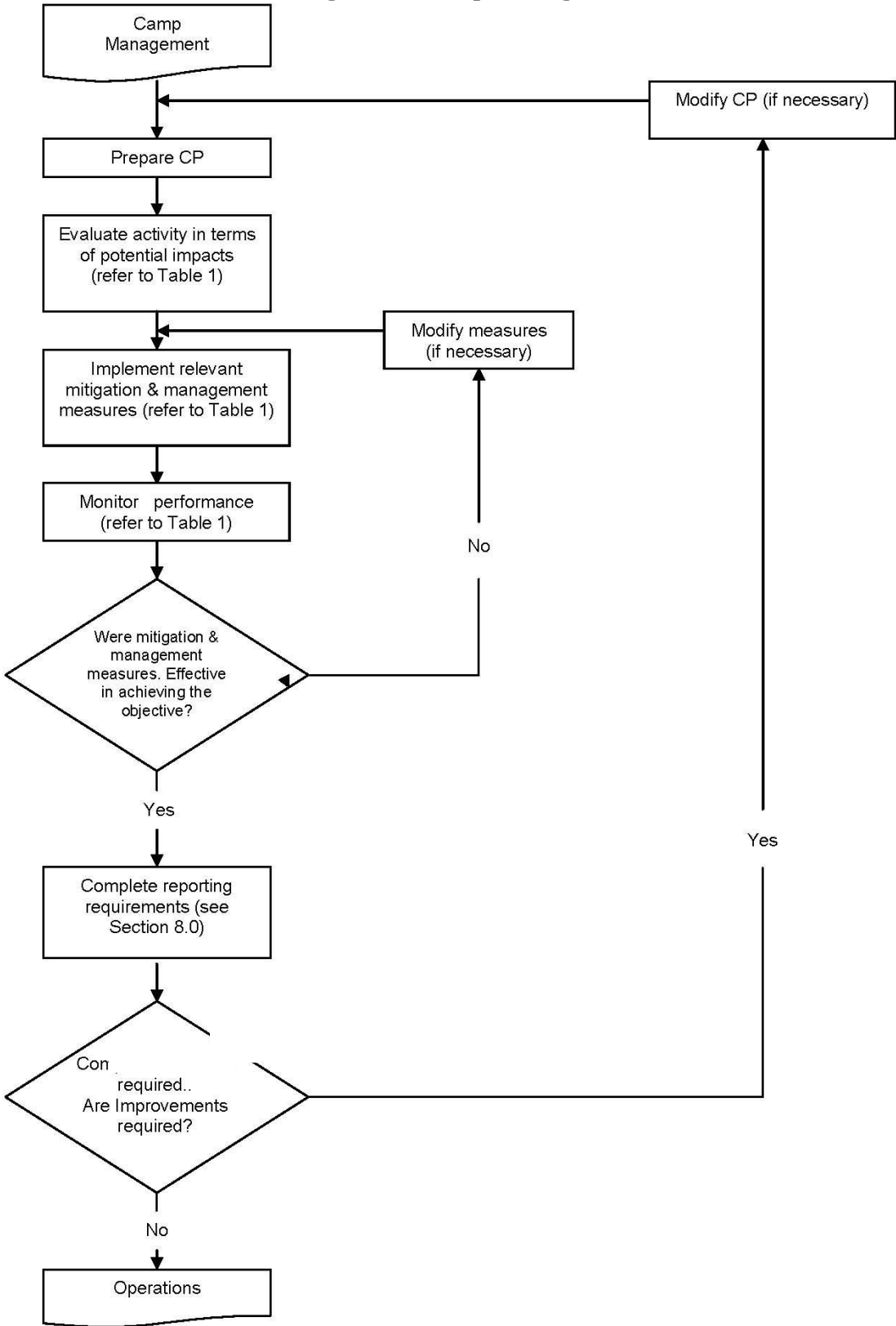
### **Management and Monitoring**

Figure below presents a flow chart summarising key management steps associated with implementation and review of this Plan, including steps to allow for continued improvement. Table 1 presents a summary of the potential impacts related to camp activities, together with mitigation and management measures to avoid or reduce these impacts, and the monitoring required to assess the performance of these measures.

The Contractor shall develop a Contractor Plan which shall, as a minimum, incorporate the camp management measures described in Table 1. The Contractor shall not be limited to these measures.

Monitoring to be undertaken as part of this Plan is described in Table 1. The Contractor is responsible for developing area or site-specific procedures for the monitoring program (where necessary) based upon the final design details of the infrastructure

Figure 1: Camp Management Process



**Table 1: Management and Monitoring**

Aspect	Potential impact	Mitigation & Management	Monitoring	Frequency	Responsibility
<b>Community Relations</b>	<p>Unauthorised movements of construction workers (during and after working hours) could result in trespassing, damage to local land and property and create amongst local residents a sense of their privacy being invaded. Residents may feel vulnerable and there may be increasing incidents of crime and or violence (GBV etc) and threats to the safety of community members.</p> <p>Disparity of pay, increase in disposable income and potential availability of illegal substances, illicit or culturally inappropriate lifestyle choices, leading to increased tension between local communities and the workers at camps.</p>	<ol style="list-style-type: none"> <li>1. Contractor shall enforce a 'closed' camp policy unless otherwise agreed and approved by Company. Workers will comply with the agreed camp closure hours.</li> <li>2. Contractor shall implement suitable measures to maintain the closed camp policy which may include perimeter security fences, security controls and guard houses, monitoring transfer of goods into and out of camps for contraband and stolen goods. Contractor should refer to the Project Security Management Plan.</li> <li>3. Contractor, as appropriate, shall provide adequate recreation facilities for workers to reduce incentive for leaving camps during leisure time.</li> <li>4. Contractor shall limit workers interaction with the community when outside the camp e.g., by organising transport directly to and from the worksite.</li> <li>5. If community members or local businesses express grievances in relation to camp related activities/operations, the Project shall respond to the grievance in accordance with the Grievance Redress Mechanism contained in the ESMF.</li> <li>6. FPMU/SPCU may request that camp related activities/operations be amended to address community grievances. Contractor shall comply with these requests.</li> <li>7. Workers shall abide by camp rules which include a disciplinary process to be developed by the contractor once appointed.</li> <li>8. The Project shall, be cognisant of the environment in which it works and shall, where practicable, respect local cultural events such as religious events, funerals and the like.</li> <li>9. The Project shall provide training to all workers on camp management including: <ol style="list-style-type: none"> <li>a. A briefing on camp rules, including closed camp policy, behaviour between fellow workers and the community;</li> <li>b. Procedures for dealing with camp related complaints, worker issues and community issues and</li> <li>c. Community relations orientation. The objective of</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. Monitoring</li> <li>2. Verification</li> <li>3. Verification</li> <li>4. Verification</li> <li>5. Notification</li> <li>6. Verification</li> <li>7. Verification</li> <li>8. Verification</li> <li>9. Verification</li> </ol>	<ol style="list-style-type: none"> <li>1. On-going</li> <li>2. Every 3 months</li> <li>3. Every 6 months</li> <li>4. On-going</li> <li>5. On-going</li> <li>6. On-going</li> <li>7. Every 3 months</li> <li>8. On-going</li> <li>9. Every 3 months</li> </ol>	<ol style="list-style-type: none"> <li>1. Contractor</li> <li>2. Contractor</li> <li>3. Contractor</li> <li>4. Contractor</li> <li>5. Contractor and FPMU/SPCU</li> <li>6. Contractor and FPMU/SPCU</li> <li>7. Contractor and FPMU/SPCU</li> <li>8. Contractor and FPMU/SPCU</li> <li>9. Contractor and FPMU/SPCU</li> </ol>

		<p>this orientation will be to increase awareness about the local area and cultural sensitivities.</p>			
Health	<p>Potential interaction between workers, persons engaged in illicit activities and the community increases the risk of spreading communicable diseases, particularly in more remote communities. Camp operations have the potential to develop favourable conditions for pests and disease, which could impact the health of workers and the community, as well as affect community livelihoods (e.g. rodent infestation affecting crops).</p>	<ol style="list-style-type: none"> <li>1. Contractor shall comply with the Minimum Health Requirements for Project Execution and the Community Health and Safety Management Plan which set out requirements and management measures on controlling communicable diseases within camps and to outside communities</li> <li>2. Contractor shall enforce the closed camp policy to limit interaction with community</li> <li>3. The Contractor shall develop a Pathogen and Pest Management Plan to prevent pathogens and pests from entering the camps and spreading outside the camps.</li> <li>4. Posters and informational sessions will be conducted to raise awareness among the workforce and communities locally around the worker camps.</li> </ol>	Verification	<ol style="list-style-type: none"> <li>1. Every three months</li> <li>2. On-going</li> <li>3. Every three months</li> </ol>	Contractor
Waste management, pollution and environmental impacts	<p>Camp has the potential to have off site pollution impacts from waste disposal, emissions and spills. Camp operations may also cause environmental issues including deteriorating water quality, erosion, sedimentation, noise and air quality issues. These factors have the potential to affect the community if not adequately managed.</p>	<ol style="list-style-type: none"> <li>a) Contractor shall exercise all reasonable due diligence to conduct its operations in a manner that will minimize pollution.</li> <li>b) Contractor shall comply with the Waste Management Plan and Hazardous Materials Management Plan which define requirements to contain, transport, handle and dispose of camp wastes and hazardous materials to avoid impacts to human health and the environment.</li> <li>c) Contractor shall also apply appropriate mitigation measures as contained in this ESMF.</li> </ol>	<ol style="list-style-type: none"> <li>1. Verification</li> <li>2. Verification</li> <li>3. Notification</li> </ol>	On-going	Contractor
Community resources	<ul style="list-style-type: none"> <li>• Any infrastructure, services or resources used by camps (e.g. water abstraction) that result in reductions/shortage/interruptions for the local community will have a negative impact.</li> <li>• There is potential for social envy and increased resentment from the community towards the Project and project team if camp facilities are perceived to be superior to those in the community. Services of note include camp health facilities, power supply, clean running water.</li> </ul>	<ol style="list-style-type: none"> <li>1. Contractor shall utilise water sources for camp use in a manner that minimises impacts on local supply and use. Where necessary, water supply should be sought outside of the community source(s).</li> <li>2. The Project shall routinely monitor quality and supply of water source used by camp through quarterly sampling exercises.</li> <li>3. Contractors shall be encouraged to extend Corporate Social Responsibility projects to host communities.</li> </ol>	<ol style="list-style-type: none"> <li>1. Verification</li> <li>2. On-going</li> <li>3. Verification</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to establishing the camps</li> <li>2. Every 3 months</li> <li>3. Annual</li> </ol>	<ol style="list-style-type: none"> <li>1. Contractor</li> <li>2. Contractor</li> <li>3. Contractor &amp; SPCU</li> </ol>



	Restricted ability to access these services may increase frustration at the level of the services available to them.				
Procurement and supply of goods	Increased demand for food and other provisions may deplete natural resources e.g. agriculture, fisheries, etc. potentially causing shortages of supply in the local community, and/or increasing the price of goods, affecting affordability for local communities.	The Project shall not purchase products in the local community unless through formal contracts with approved suppliers.	Verification	On-going	Contractor
Camp location	<ul style="list-style-type: none"> <li>Siting of camps may result in displacement of residents, loss of productive lands and the resources upon these lands. Camps may also restrict or impede access to areas for the local community.</li> <li>Construction camps may result in a noticeable increase in traffic, noise, air emissions and light intrusion which could negatively affect the amenity and lifestyle of nearby communities and pose a potential safety issue.</li> </ul>	<ol style="list-style-type: none"> <li>Potential camp locations will be selected in consultation with FPMU/SPCU and affected communities will be subsequently consulted. Necessary permits will be obtained from the relevant Local Authorities for the approved camp location.</li> <li>The Project shall refer to those Environmental &amp; Social Management Plan's (ESMP) that include mitigation/avoidance measures that relate to the local community, including: <ul style="list-style-type: none"> <li>Noise and Vibration Management Plan;</li> <li>Air Emissions Management Plan; and</li> <li>Waste Management Plan.</li> </ul> </li> </ol>		<ol style="list-style-type: none"> <li>Prior to establishing the camp</li> <li>On-going</li> </ol>	Contractor and/or Company
Labour Influx	There is a likelihood of influx of non local labour into areas around the construction camps. However, people from outside of the local area may migrate into existing settlements or develop new settlements in proximity to camps and the Project area. Labour Influx can result in disputes and sometimes violence between the new settlers and the resident community. Migrants moving into existing settlements may increase demand and inflate prices for housing, goods and services. Increased population and development of new and uncontrolled settlements increase pressure on infrastructure, services and resources. Major labour influx related risks include workers' sexual relations with minors and resulting pregnancies, presence of sex	<ul style="list-style-type: none"> <li>Contractor shall enforce a 'closed' camp policy. This is intended to deter individuals setting up near camp.</li> <li>Contractor shall develop a Labour Influx Management Plan.</li> <li>Contractor is to coordinate with Local government to ensure that no illegal and unsafe settlements develop.</li> <li>Contractor shall review and ensure adherence to labour influx management plan.</li> </ul>	Verification	On-going	Contractor and FPMU/SPCU

	workers in the community, the spread of HIV/AIDS, sexual harassment of female employees, child labour and abuse, increased drop out rates from school, poor labour practice and lack of road safety.				
Worker welfare and living conditions	Construction workers living in camps may encounter stresses and discomforts that negatively impact their health and welfare. These stressors or discomforts may be caused by Poor living conditions (accommodation, ablution and sanitary, health, recreation catering and laundry).	Contractor shall comply with minimum standards for camp buildings, facilities and services in line with the Bank standard or as contained in the Project Invitation to Tender (ITT) requirements.	Verification	On-going	Contractor
	Cultural issues (nationality, religion, discrimination, GBV and harassment, etc.).	<ul style="list-style-type: none"> <li>Contractor shall ensure that applicable ESMF mitigation measures for specific issues are applied.</li> <li>Contractor may provide prayer rooms and other facilities, as necessary and to the extent practicable, to satisfy the religious needs and customs of its workforce.</li> <li>Contractor's personnel shall not engage in any discrimination, GBV, SEA or harassing behaviour. Contractor shall establish an Equal Opportunity Policy to promote non-discrimination in accordance with Labour and Worker Conditions Management Plan.</li> <li>Contractor shall implement a worker grievance procedure to address grievances between workers. .</li> </ul>	Verification	On-going	Contractor
	Mental health issues (morale, isolation, family attachments, boredom).	<ul style="list-style-type: none"> <li>Camps will be treated as closed camps. Camp rules in relation to alcohol consumption and drug prohibition will be complied with.</li> <li>Contractor shall provide recreational facilities where practicable.</li> <li>Contractor will provide counselling for all workers, with no discrimination by race, sex or religion.</li> </ul>	Verification	<ul style="list-style-type: none"> <li>On-going</li> <li>Every 6 months</li> </ul>	Contractor
	Personal security (crime, and emergencies).	<ul style="list-style-type: none"> <li>Camps will be controlled by security to avoid intrusions from outside community.</li> <li>Work Site Security Plan to be developed by Contractor shall include security measures to be provided at the camps which may include fencing, locks, alarms, pass card systems, badge and pass system, access points, safe transport of personnel as appropriate.</li> <li>Contractor shall develop an Emergency Response Plan that meets requirements set out in ITT package</li> </ul>	Verification	Prior to establishing camp	Contractor
	Environmental stress (climate, noise etc.).	Contractor shall comply with Minimum Health requirements for	Verification	On-going	Contractor

		<p>Project Execution including the following:</p> <ul style="list-style-type: none"> <li>• Accommodation will be designed to suit climatic conditions;</li> <li>• Accommodation and surroundings shall be constructed so that noise does not interfere with sleep to the extent that is reasonably practicable; and</li> <li>• Health and hygiene inspections shall be carried out.</li> </ul>			
<b>Decommissioning</b>	<p>Decommissioning of camps has several potential impacts:</p> <ul style="list-style-type: none"> <li>• Local employment and provision of local goods and services at camps will no longer be required;</li> <li>• Locals employed and previously accommodated in camps will no longer have access to services and benefits available at camps (e.g. health services, recreation facilities); and</li> <li>• Infrastructure which provides benefits to communities may no longer be maintained (e.g. roads, camp boreholes ) and may be decommissioned and removed.</li> </ul>	<ul style="list-style-type: none"> <li>• Contractor is to follow retrenchment procedure contained in Labour and Worker Conditions Management Plan (if available)</li> <li>• Where Community requests, some infrastructure and services may be retained as advised by the FPMU and the World Bank: <ul style="list-style-type: none"> <li>○ Disturbed areas will be reinstated;</li> <li>○ Where practicable, Contractor will return camp areas to former landforms;</li> <li>○ No facilities will be maintained in or near especially environmentally or socially sensitive areas; and</li> <li>○ Where there are negative consequences of induced access, the facility will also be decommissioned and the area reinstated.</li> </ul> </li> </ul>	Verification	On-going	Contractor and FPMU/SPCU

